

# Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)  
(ENGLAND) REGULATIONS 2012



## Regulation 19 Pre-Submission Plan

### REPRESENTATION FORM

The easiest way to submit your comments is online at <https://centrallocalplan.citizenspace.com/planning/cllp-regulation-19-representation-period/>. Alternatively, you can scan the QR code on the right, using a smartphone, to be taken to the webpage. **We would encourage you to use the online form wherever possible.** Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



#### Submission form

This form has two parts-

**Part A** – Personal Details: need only to be completed once. **We will not be able to accept responses where personal details are not provided.**

**Part B** – Your representation(s): Please fill in a separate sheet for each representation you wish to make relating to each individual policy.

You will be asked to give details of why you consider the policies of the Local Plan to be sound or unsound, please be as precise as possible. You will also be asked to set out the modification(s) you consider necessary to make the Local Plan policies sound in respect of any soundness matters you have identified. You will need to say why each modification will make the policy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### Privacy Notice

If you have any questions about how the Central Lancashire Authorities will handle your personal data, please see our Data Protection Policy Statement or contact us via email at [centrallancashireplan@chorley.gov.uk](mailto:centrallancashireplan@chorley.gov.uk)

- Chorley Privacy Statement: <https://chorley.gov.uk/privacy>
- Preston Privacy Statement: <https://www.preston.gov.uk/article/1231/Data-protection-policy-statement>
- South Ribble Privacy Statement: <https://southribble.gov.uk/privacypolicy>

**Part A: Personal Details\***

We will not be able to accept responses where personal details are not provided.

1. Please provide your contact details.

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in the Person Details boxes below but complete the full contact details of the agent in Agent Details.*

|                                                                           | Representor<br>Personal Details              | Agents Details<br>(if applicable)      |
|---------------------------------------------------------------------------|----------------------------------------------|----------------------------------------|
| Title                                                                     | Mr                                           | Mr                                     |
| First Name                                                                | Roger                                        | Matthew                                |
| Last Name                                                                 | Bracewell                                    | Good                                   |
| Job Title<br>(where relevant)                                             | ██████████                                   | ████████████████████                   |
| Organisation<br>(where relevant)                                          | ████████████████████                         | ██████████████                         |
| Address Line 1                                                            | ████████████████████                         | ████████████████████<br>██████         |
| Address Line 2                                                            | ████████████████████                         | ██████████                             |
| Town                                                                      | ██████████                                   | ██████████                             |
| Postcode                                                                  | ██████████                                   | ██████████                             |
| Telephone number                                                          | ██████████████                               | ██████████████                         |
| Email address                                                             | ████████████████████<br>████████████████████ | ████████████████████<br>██████████████ |
| What authority do you live / work in? (Chorley, Preston, or South Ribble) | ██████████                                   | ██████                                 |

**Part B: Please use a separate sheet for each representation you wish to make**

|                              |                          |
|------------------------------|--------------------------|
| <b>Name or Organisation:</b> | GA Pet Food Partners Ltd |
|------------------------------|--------------------------|

**3. To which part of the Local Plan does this representation relate?**

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

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| Comment being made against: | Reference (please provide) |
|-----------------------------|----------------------------|
| Policy:                     | EC1                        |
| Paragraph:                  |                            |
| Development Site:           |                            |
| Policies Map:               |                            |
| Evidence:                   |                            |
| Other (Please state):       |                            |

**4. Do you consider the Local Plan is:**

|                                                                                                      | Please check the relevant box       |                                     |
|------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|
|                                                                                                      | Yes                                 | No                                  |
| 1) Legally compliant                                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2) Sound<br><br>(If you check 'No', please also confirm below which of the 'tests' it fails to meet) | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| a) Positively prepared                                                                               | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Justified                                                                                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Effective                                                                                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Consistent with national policy                                                                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 3) Complies with the duty to co-operate                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The plan clearly seeks to support economic growth. This is clear through the plan objectives and several policies including:

- i) **Strategic Objective 4 – Economic Prosperity** – states “to provide a range of employment and economic growth opportunities in sustainable locations.”
- ii) **Spatial Strategy – Policy SS1 – Development Patterns** – states “(c) support and reinvigorate the role of centres as focal points for services, facilities, employment and sustainable locations.”
- iii) **Policy SS2 on Settlement Hierarchy** – states “(b) this will be delivered through allocated sites and in adjoining the towns, windfall sites and town centre renewal activity meet development need.”
- iv) **CLLP Chapter 5 – Prosperous Economy. Paragraph 5.2, Page 85** – states “ support economic growth and better productivity are key national priorities, taking account of local business needs. Sustainable economic growth should be encouraged with sites or criteria identified for local and inward investment to meet anticipated needs over the plan period. Locational requirements of different sectors should be recognised and support given to a prosperous rural economy.”

These statements are supported.

Policy EC1 identifies an objectively assessed need (OAN) for circa 173ha of employment land across the whole of the plan area. Policy EC1 identifies that the need is distributed between the three constituent authorities in the following way.

**Table 1: Employment OAN for each local authority area (hectares)**

| Local authority Area | Offices | Industrial / warehouse | Total |
|----------------------|---------|------------------------|-------|
| Chorley              | 6.48    | 34.97                  | 41.45 |
| Preston              | 6       | 68.43                  | 74.43 |
| South Ribble         | 5.76    | 51.23                  | 56.99 |

The OAN for each local authority area and the combined figure has been derived from the evidence provided by the ‘Central Lancashire Employment Land Study – Land Supply and OAN Update 2024’ (2024 Employment Study).

It is notable that the OAN figures suggest a significant reduction from the previous 2022 ‘Central Lancashire Employment Land Study’ which suggested a total need of 225.06ha with 76.34ha being identified for Chorley. Whilst it is recognised there are differences in the assessed periods, if broken down annually significant disparities remain. For example, the 2022 study suggests an average annual need for Chorley of 3.47ha, compared to just 2.3ha in the 2024 Employment Land Study, this is a 41% reduction. The 2024 Employment Land Study whilst using a different methodology does not articulate why should a large reduction has occurred. This will have a significant impact upon the potential economic prosperity of the area and as such should be given detailed consideration. It is, therefore, questionable whether the plan is being positively prepared.

Part 2 of Policy EC1 identifies that economic growth and employment land supply will be provided for through existing and new employment allocations and extant planning permissions. Unfortunately, neither the plan nor its supporting evidence base clearly sets out how the identified OAN for each authority and the whole plan area will be met. Our analysis of the plan indicates that the supply will be provided by the policies SS3, EC2-EC6 as identified below. It is understood some of these sites benefit from extant or pending permissions.

**Table 2: Proposed Local Plan Employment Land Supply (hectares)**

| Local authority Area | Strategic Policy SS3 | Policies EC2-4 | Policies EC5 and EC6 | Total |
|----------------------|----------------------|----------------|----------------------|-------|
| Chorley              | 0                    | 7.68           | 12.66                | 20.34 |
| Preston              | 63.3                 | 73.2           | 0                    | 136.5 |
| South Ribble         | 0                    | 11.3           | 50                   | 61.3  |

It is understood that the above figures are based upon the assessments within the 2024 Strategic Housing and Employment Land Availability Assessment (SHELAA). The sites within the SHELAA were assessed in relation to them being suitable, available and achievable. GA Petfood Partners considers the assessments within this document to be flawed, which has in turn limited the supply of potential employment land within Chorley. A good example is the Euxton Park Golf Centre, Euxton Lane (SHELAA ref: 19C050). This site was not proposed for allocation. The assessed area was just 0.69ha of the full site. The SHELAA assessment concluded that was likely to be of negligible interest to local developers and hence it was not proposed for allocation. However, the assessed site only represents a small proportion of the Euxton Park Golf Centre promoted by GA Petfood Partners. It is unclear and unjustified why only this small proportion was assessed.

**Table 3: Proposed Supply compared to OAN (hectares)**

| Local authority Area | OAN    | Total Supply |
|----------------------|--------|--------------|
| Chorley              | 41.45  | 20.34        |
| Preston              | 74.43  | 136.5        |
| South Ribble         | 56.99  | 61.3         |
| CLLP Area            | 172.87 | 218.14       |

A review of table 3 identifies that the plan, as a whole, is proposing to allocate more employment land than the identified need. However, the distribution does not match the identified needs. In the case of Preston and to a lesser extent South Ribble the plan is seeking to over allocate. Whilst we do not object to the proposed employment allocations in these locations, we do object to the significant deficit against need proposed to be allocated within Chorley. It should be noted that to be positively prepared (NPPF, paragraph 36) plans should as a minimum seek to meet the area's objectively assessed needs. It is currently failing to do this with regards to Chorley.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure that the policy is sound, additional evidence is required to justify the significant reduction in the employment land OAN. Furthermore, greater clarity is required with regards to the amount and sources of supply of employment land proposed within the plan, as well as the proposed distribution. This will provide clarity and identify whether or not the employment land OAN is justified.

It is considered that the supply of available employment land should meet the needs of each local authority area as a minimum. This is required for the plan to be considered positively prepared. In the case of the Chorley local authority area the plan is delivering less than 50% of the overall need identified. This is unsound. Further allocations should, therefore, be provided.

The further allocations required for the Chorley area should consider the full extent of the sites promoted. This will help to ensure that site are not artificially 'ruled out' due to unrealistic and unjustified assumptions.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

|                                                      | Please check the relevant box       |
|------------------------------------------------------|-------------------------------------|
| No, I do not wish to participate in hearing sessions | <input type="checkbox"/>            |
| Yes, I wish to participate in hearing sessions       | <input checked="" type="checkbox"/> |

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the examining Inspectors are fully aware of our unique concerns and issues with the current plan. GA Petfood Partners also wish to be able to respond to any further evidence or statements provided by the Council's or third parties. Furthermore, we wish to discuss the acceptability of any potential modifications proposed by the Council's or the Inspectors.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

**Forms must be received by midnight on Monday 14 April 2025.**



**Part B: Please use a separate sheet for each representation you wish to make**

|                              |                          |
|------------------------------|--------------------------|
| <b>Name or Organisation:</b> | GA Pet Food Partners Ltd |
|------------------------------|--------------------------|

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| Comment being made against: | Reference (please provide) |
|-----------------------------|----------------------------|
| Policy:                     | EC2                        |
| Paragraph:                  |                            |
| Development Site:           |                            |
| Policies Map:               |                            |
| Evidence:                   |                            |
| Other (Please state):       |                            |

**4. Do you consider the Local Plan is:**

|                                                                                                      | Please check the relevant box       |                                     |
|------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|
|                                                                                                      | Yes                                 | No                                  |
| 1) Legally compliant                                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2) Sound<br><br>(If you check 'No', please also confirm below which of the 'tests' it fails to meet) | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| a) Positively prepared                                                                               | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Justified                                                                                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Effective                                                                                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Consistent with national policy                                                                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 3) Complies with the duty to co-operate                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

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Our response to this policy should be read in conjunction with Policy EC1.

Policy EC2 identifies just 7.68ha of employment allocations will be delivered within Chorley. Once mixed-use sites are considered the employment land supply raises to just 20.34ha, less than 50% of the identified need (41.45ha). The reason for this is not justified in either the local plan or supporting evidence.

Whilst the overall CLLP need is being met this does not assist companies, such as GA Petfood Partners, who have a base within Chorley and a clear need to expand. GA has been a success story for Chorley and the wider Central Lancashire area and now needs further room to expand its operation at Buckshaw Village. To continue this success and provide potential additional employment opportunities it needs to expand its current operations within Buckshaw Village. As discussed against Policy Ec1 and later in these representations a site at Euxton Park Golf Centre, Euxton Lane (SHELAA ref: 19C050) adjacent its existing facility has been identified, yet only a very small part of this site has been assessed.

This site is the only viable option for GA due to issues of logistics, cost, staff moves and time. The site on Euxton Lane is owned by GA and would only be used for GAs needs, it would not be provided for third parties. The alternative to expansion onto the Euxton Lane site is likely to require a wholesale move of its Buckshaw operation elsewhere, this would have the effect of severing links with the community in this area and undermining the success of Buckshaw Village by leaving two large sites vacant. This is not considered a desirable option.

It is unclear why the full extent of the 8ha Euxton Park Golf Centre, Euxton Lane was not assessed. There are clear reasons for assessing and allocating the whole site, these are:

1. Scale - the assessed area at just 0.69ha is extremely limiting and unlikely to attract investment to develop the site. Whilst it is recognised that the assessed area relates to the brownfield elements of the site, specifically the small car park and existing buildings, the scale makes the site very limiting in terms of viability, potential end uses, and the use of the residual Golf Centre site.
2. Ownership - the site is currently owned by GA Petfood Partners and would not be made available for development by a third party. The site is needed to sustain the existing business, as set out above.
3. Location - the wider Euxton Park Golf Centre site is bordered by commercial and employment development on all three sides, facing directly onto Euxton Lane. It is our view that the site performs very poorly against the five Green Belt purposes. This is considered in our comments upon Policy EN15.

4. Utilities - the site is well served with utilities and has an agreed Improvement Scheme with the Highway Authority, Lancashire County Council for a single access serving the whole site.
5. Accessibility - the site is well served by existing road / rail infrastructure, and by the local footpath / cycleway network. It would add further employment opportunities to reinforce the sustainability of the area.

(Continue on a separate sheet /expand box if necessary)

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Additional allocations should be provided within the administrative area of Chorley Council. These should be sustainably located near existing employment centres to enable existing successful businesses, such as GA Petfood Partners, to expand and thrive. This should include allocation of the site at Euxton Park Golf Centre, Euxton Lane, (SHELAA ref: 19C050, incorporating the whole of the Golf Centre).

(Continue on a separate sheet /expand box if necessary)

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|                                                      | Please check the relevant box       |
|------------------------------------------------------|-------------------------------------|
| No, I do not wish to participate in hearing sessions | <input type="checkbox"/>            |
| Yes, I wish to participate in hearing sessions       | <input checked="" type="checkbox"/> |

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|                              |                          |
|------------------------------|--------------------------|
| <b>Name or Organisation:</b> | GA Pet Food Partners Ltd |
|------------------------------|--------------------------|

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| Comment being made against: | Reference (please provide) |
|-----------------------------|----------------------------|
| Policy:                     | EN15                       |
| Paragraph:                  |                            |
| Development Site:           |                            |
| Policies Map:               |                            |
| Evidence:                   |                            |
| Other (Please state):       |                            |

**4. Do you consider the Local Plan is:**

|                                                                                      | Please check the relevant box       |                                     |
|--------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|
|                                                                                      | Yes                                 | No                                  |
| 1) Legally compliant                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2) Sound                                                                             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (If you check 'No', please also confirm below which of the 'tests' it fails to meet) |                                     |                                     |
| a) Positively prepared                                                               | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Justified                                                                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Effective                                                                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Consistent with national policy                                                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 3) Complies with the duty to co-operate                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

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GA Petfood Partners part support and part object to Policy EN15. The differing elements are set out below.

#### Part 4: Major developed sites within the Green Belt

We strongly support part 4 which relates to 'Major developed sites within the Green Belt'. This policy is considered particularly beneficial for GA Petfood Partners production site based at Plocks Farm, Bretherton. This policy support for major developed site in the greenbelt will provide the substantial weight to enable the continued sustainable development of the site, which will continue throughout the plan period.

#### Extent of the Green Belt

We object to the lack of an assessment of the extant extent of the Green Belt.

The Chorley Council administrative area is, outside of the main towns and villages, largely washed over with Green Belt and there are very limited areas of land outside the Green Belt available for development. The Council will be aware that paragraph 145 of the NPPF identifies that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced. Paragraph 146 is clear that exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

The Planning Practice Guidance (PPG) (ref:64-002) identifies that Green Belt assessments should also inform the preparation of Spatial Development Strategies where these will be setting the strategic context for land release. As discussed within our comments upon Policy EC1 and Policy EC2 we consider further employment land provision is required within the Chorley Council administrative area which would warrant the release of Green Belt. The lack of a Green Belt assessment in these circumstances is considered unjustified.

GA Petfood Partners considers that the area of Green Belt to the north of Euxton Lane currently occupied by the Euxton Park Golf Centre does not fulfil the purposes of Green Belt. It is bordered by commercial and employment development on all three sides, and the fourth side faces directly onto Euxton Lane and would be a logical 'rounding off' of the developed area. The logical boundary in this area is Euxton Road.

It is our view that the site performs very poorly against the five Green Belt purposes and would be released if a thorough Green Belt review was undertaken.

Furthermore, NPPF paragraph 155<sup>1</sup> identifies that development on Green Belt would not be inappropriate where:-

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes of the remaining Greenbelt across the area of the plan;
- b) There is a demonstrable unmet need for the type of development proposed;
- c) The development would be in a sustainable location, with particular reference to Paragraphs 110 and 115 of this framework.

The PPG (64-002) identifies that in order to identify grey belt land, authorities should produce a Green Belt assessment, either as part of the review of Green Belt boundaries during the preparation or updating of a local plan, or at another relevant point. The CLLP has, to date, failed to do this.

The PPG provides further guidance upon how grey belt assessments should be undertaken. The table below provides an assessment of the GA Petfood Partners site at Euxton Park Golf Centre, Euxton Lane utilising this guidance against the relevant Green Belt purposes. Our analysis clearly demonstrates that the site meets the criteria of a grey belt site.

| Purpose                                                     | Analysis                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Contribution as per PPG Guidance                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A: To check the unrestricted sprawl of large built-up areas | This represents a small gap in the existing development at Buckshaw Village and along Euxton Lane. There is existing development along Euxton Lane (such as Runshaw College) and Revolution Park is north of the railway line. Further development in this area would be a logical 'rounding off' of the developed area. The site when viewed in context is surrounded on three sides by commercial activity. The logical boundary in this area is Euxton Road. | <b>Weak or None</b><br>Assessment areas that make only a weak or no contribution are likely to include those that:<br>- are not adjacent to or near to a large built-up area<br>- are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development |
| B: To prevent neighbouring towns                            | As discussed in the PPG this purpose strictly relates to the                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Weak or None</b><br>Assessment areas that                                                                                                                                                                                                                                                                     |

<sup>1</sup> Note part d) is not relevant to GA Petfood Partners

|                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| merging into one another                                           | <p>merging of towns, not villages. Euxton is identified as a tier 3 settlement within the settlement hierarchy (Policy SS2_ and as such not considered a town. The merging with Chorley is, therefore, not relevant.</p> <p>The development of Revolution Park and forthcoming development of allocation EP1.3 has already significantly eroded the gap between Euxton and Chorley, north of Euxton Lane. The current frontages of the Golf Centre and football training area do little to preserve a feeling of openness. The main area of separation is south of Euxton Lane. The towns of Chorley and Euxton have already been joined by the development of Buckshaw Village and Revolution Park. This joining has been further reinforced by the development at Strawberry Fields.</p> | <p>contribute weakly are likely to include those that:</p> <ul style="list-style-type: none"> <li>- do not form part of a gap between towns, or</li> <li>- form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation</li> </ul>                                       |
| D: To preserve the setting and special character of historic towns | The site does not provide views in or out of the historic core of Chorley or indeed any other historic assets.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p><b>Weak or None</b></p> <p>Assessment areas that make no or only a weak contribution are likely to include those that:</p> <ul style="list-style-type: none"> <li>- do not form part of the setting of a historic town</li> <li>- have no visual, physical, or experiential connection to the historic aspects of the town</li> </ul> |
| Overall rating                                                     | The site scores poorly against all but one of the five purposes of Green Belt.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Weak None</b>                                                                                                                                                                                                                                                                                                                         |

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or

soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A Green Belt review should be undertaken to identify areas of the extant Green Belt which should be released to meet identified development needs. This should include the site at Euxton Park Golf Centre, Euxton Lane, which performs very poorly against the five purposes of Green Belt.

Furthermore, in the unlikely event this site was not released following a Green Belt review the PPG also requires local authorities to undertake a grey belt assessment. As described in the table above the site at Euxton Park Golf Centre, Euxton Lane is a grey belt site when assessed using the criteria set out within the PPG.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

|                                                      | Please check the relevant box       |
|------------------------------------------------------|-------------------------------------|
| No, I do not wish to participate in hearing sessions | <input type="checkbox"/>            |
| Yes, I wish to participate in hearing sessions       | <input checked="" type="checkbox"/> |

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the examining Inspectors are fully aware of our unique concerns and issues with the current plan. GA Petfood Partners also wish to be able to respond to any further evidence or statements provided by the Council's or third parties.

Furthermore, we wish to discuss the acceptability of any potential modifications proposed by the Council's or the Inspectors.

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.***

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

**Forms must be received by midnight on Monday 14 April 2025.**



**Part B: Please use a separate sheet for each representation you wish to make**

|                              |                          |
|------------------------------|--------------------------|
| <b>Name or Organisation:</b> | GA Pet Food Partners Ltd |
|------------------------------|--------------------------|

**3. To which part of the Local Plan does this representation relate?**

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

| Comment being made against: | Reference (please provide) |
|-----------------------------|----------------------------|
| Policy:                     | CC2                        |
| Paragraph:                  |                            |
| Development Site:           |                            |
| Policies Map:               |                            |
| Evidence:                   |                            |
| Other (Please state):       |                            |

**4. Do you consider the Local Plan is:**

|                                                                                      | Please check the relevant box       |                                     |
|--------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|
|                                                                                      | Yes                                 | No                                  |
| 1) Legally compliant                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2) Sound                                                                             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (If you check 'No', please also confirm below which of the 'tests' it fails to meet) |                                     |                                     |
| a) Positively prepared                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Justified                                                                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Effective                                                                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Consistent with national policy                                                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 3) Complies with the duty to co-operate                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CC2: Renewal Energy Generation and District Heating Networks is generally supported by GA Petfood Partners. However, much of the Central Lancashire Local Plan area, in particular Chorley Council area is 'washed over' with Green Belt. Where renewable energy generation infrastructure may be considered to be inappropriate and would need to demonstrate 'very special circumstances' if projects are to proceed.

Paragraph 160 of the National Planning Policy Framework provides 'such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources'.

This should be recognised within the policy.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order for the Policy to be compliant with National Policy, the following amendment should be incorporated into Policy CC2. The addition of an item (4) should be added to the base of the policy as follows:-

- (4) Renewable energy projects in the Greenbelt will need to demonstrate very special circumstances if projects are to proceed. Special circumstances may include the environmental benefits associated with increased production of energy for renewable sources.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested

modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

|                                                      | Please check the relevant box       |
|------------------------------------------------------|-------------------------------------|
| No, I do not wish to participate in hearing sessions | <input type="checkbox"/>            |
| Yes, I wish to participate in hearing sessions       | <input checked="" type="checkbox"/> |

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