

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

- 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 Personal Details	Agents Details (if applicable)
Title		Mr
First Name		Paul
Last Name		Newton
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Maple Grove Developments	Stantec
Address Line 1	c/o Ageny	7 Soho Square
Address Line 2		
Town		London
Postcode		W1D 3QB
Telephone number		07802 284913
Email address		paul.newton@stantec.com
What authority do you live / work in? (Chorley, Preston, or South Ribble)		n/a

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

Name or Organisation:

Maple Grove Developments

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:	
Paragraph:	3.22
Development Site:	Cuerden 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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 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 type="checkbox"/>
3) Complies with the duty to co-operate	<input 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 CLLP introduces and allocates a number of Strategic Site Allocations (four in total) which are described at paragraph 3.22 as having the potential to deliver development at a strategic scale that brings a range of benefits, such as securing infrastructure alongside growth. They are considered central to the delivery of the spatial strategy.

Strategic Sites are defined in the Glossary to the Plan as:

“Strategic sites are areas of land that have been identified in the Local Plan for housing and economic development.”

Having reviewed the Strategic Sites that have been identified we believe that the Cuerden Site (identified under Policy EC6) should be classified as a Strategic Site within the CLLP. The Site exhibits all of the stated requirements of a Strategic Site and is of a scale commensurate with the other Strategic Sites.

The Site is currently identified as a Strategic Site in the adopted South Ribble Local Plan under Policy C4. It is noted as a sustainable and strategically significant site, capable of stimulating economic growth in Central Lancashire and the wider Lancashire sub region with the potential of attracting significant inward investment. More recently, planning permission has been granted (LCC/2022/0044) for a comprehensive mixed-use scheme that will deliver substantial social, economic, and environmental benefits to the region.

We therefore believe the Curden Site should retain its strategic site status and be included within the site-specific policies within Section 3 of the CLLP.

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.

We therefore believe the Curden Site should retain its strategic site status and be included within the site-specific policies within Section 3 of the CLLP. Its exclusion has not (and cannot) be justified.

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 demonstrate to the Inspector the strategic significance of the Cuerden Site, the detailed benefits it will deliver to the region and why it should be included within the CLLP as a Strategic Site Allocation.

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.

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

Name or Organisation:

Maple Grove Developments

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:	EC6 (and Associated Appendix 6)
Paragraph:	
Development Site:	Cuerden 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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 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 type="checkbox"/>
3) Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

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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.

Whilst the general allocation of the Site is supported (subject to our comments requesting it be elevated to being a Strategic Site), the Policy fails to include a fundamental caveat that was included within the previous site allocation policy, Policy C4 of the South Ribble Local Plan. The policy along with the adopted site wide Masterplan acknowledged that 'alternative uses' other than employment uses may be acceptable where they are clearly demonstrated to be necessary to fund essential infrastructure. This caveat is fundamental to the delivery of the Site (and the delivery of its associated benefits) as without it, the site would not come forward for development. This was clearly demonstrated as part of the recent grant of planning permission for the Site (LCC/2022/0044) via detail viability evidence. The exclusion of this wording from draft Policy EC6 has not been justified and has the potential (if the current permitted scheme does not come forward) to undermine and stifle the future development of the site (and the associated significant benefits that would be delivered).

Further, the Key Development Considerations for the Site, set out in Appendix 6 also require some refinement, in order to optimise the prospects of the Site being brought forward for development.

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.

Please see attached sheet suggesting amended wording for Policy EC6 and Appendix 6 – Key Development Considerations.

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"/>

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 demonstrate to the Inspector the strategic significance of the Cuerden Site, the detailed elements that feed into the potential delivery of the Site (and the abnormal infrastructure costs), the detailed benefits it will deliver to the region and why it is fundamental that the additional wording suggested be incorporated into Policy EC6.

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.

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

Name or Organisation:	Maple Grove Developments
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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:	
Paragraph:	
Development Site:	
Policies Map:	EC7.1 (Should be EC6.1)
Evidence:	
Other (Please state):	

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 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 type="checkbox"/>
3) Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

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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 Cuerden Site is identified for development under Policy EC6. It is referred to in the table of EC6 as Site EC6.1. However, the Proposals Map erroneously identifies the Site as EC7.1. This should be amended.

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.

The Cuerden Site allocated under Policy EC6 should be referred to as Site EC6.1 on the Proposals Map (rather than as currently EC7.1).

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 checked="" type="checkbox"/>

Yes, I wish to participate in hearing sessions

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:

N/A

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.

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

Name or Organisation:	Maple Grove Developments
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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:	HS3
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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 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 type="checkbox"/>
3) Complies with the duty to co-operate	<input 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 HS3 sets out the housing allocations within South Ribble. It does not however make any reference to the residential component of the Cuerden Site (allocated under Policy EC6). Policy EC6 notes that the Cuerden Site could deliver 220 units within the plan period. This would represent the 5th largest residential allocation/development within South Ribble.

It is unclear why the Cuerden allocation has not been included within the Policy HS3. It should be noted in the policy or at the very least the supporting text to the policy to provide clarity. It should also be noted how the strategic sites and other allocated sites that will deliver housing within South Ribble contribute to the overall housing delivery figures.

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.

We therefore believe the Curden Site should be referenced in Policy HS3 as delivering 220 residential units.

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 checked="" type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input 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:

N/A

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.

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

Name or Organisation:	Maple Grove Developments
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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:	
Paragraph:	5.8
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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 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 type="checkbox"/>
3) Complies with the duty to co-operate	<input 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.

Paragraph 5.8 of the CLLP notes that provision is made for the growth in the office sector in Preston City Centre, Leyland and Chorley Town Centres and through mixed use allocations such as the Cuerden Site (Policy EC6). The currently planning permission (LCC/2022/0044) covering the Site does not include a large element of office use. It is therefore unclear why the Cuerden Site has been referenced in Paragraph 5.8. Reliance on the Cuerden Site to deliver the required level of office accommodation across the plan period has the potential to undermine the economic objectives of the plan.

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.

Reference to the Curden Site should be deleted from Paragraph 5.8.

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 checked="" type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input 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:

N/A

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.

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

Name or Organisation:	Maple Grove Developments
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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:	EC4
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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 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 type="checkbox"/>
3) Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

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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 EC4 sets out the employment allocations within South Ribble. It does not however make any reference to the employment component of the Cuerden Site (allocated under Policy EC6). Policy EC6 notes that the Cuerden Site could deliver 50 hectares of land for employment uses within the plan period. This would represent the largest employment allocation/development within South Ribble.

It is unclear why the Cuerden allocation has not been included within the Policy EC4. It should be noted in the policy or at the very least the supporting text to the policy to provide clarity. It should also be noted how the strategic sites and other allocated sites that will deliver employment uses within South Ribble contribute to the overall employment needs of the area.

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.

We therefore believe the Curden Site should be referenced in Policy EC4 as delivering 50 hectares of employment land.

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 checked="" type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input type="checkbox"/>

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

N/A

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.

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

Name or Organisation:	Maple Grove Developments
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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:	EN1
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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>
3) Complies with the duty to co-operate	<input 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 EN1 relates to well designed places. Amongst other matters it requires under criterion 4 that 'all significant schemes' will be required to 'provide a Masterplan, parameter plans, and a design code' in support of their application. This goes beyond the requirements sets out within the various site allocation proformas and would not be appropriate for all schemes/proposals (for example full planning applications). Further, what constitutes a 'significant scheme' is not defined within the Plan.

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.

Policy EN1 should be modified to only require 'a Masterplan, parameter plans, and a design code' where appropriate.

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 checked="" type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input 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:

N/A

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.

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

Name or Organisation:	Maple Grove Developments
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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:	EN13
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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Complies with the duty to co-operate	<input 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 EN13 relates to proposals affecting heritage assets and archaeology. Whilst it includes reference to 'substantial harm' or total loss of a heritage asset there is nothing within the policy that addresses proposals that would have 'less than substantial harm' on a heritage asset in line with paragraph 215 of the National Planning Policy Framework (NPPF).

It is important that the policy acknowledges that where a proposal will lead to less than substantial harm to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

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.

The wording of Policy EN13 should be expanded to include reference to proposals that would have 'less than substantial harm' in line with paragraph 215 of the NPPF.

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 checked="" type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input 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:

N/A

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.

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

Name or Organisation:	Maple Grove Developments
------------------------------	---------------------------------

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:	CC1
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 type="checkbox"/>	<input type="checkbox"/>
2) Sound (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 type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Complies with the duty to co-operate	<input 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 CC1 – Climate Change requires development proposals to maximise opportunities to contribute to the delivery of net zero greenhouse gas emissions and requires an Energy Statement to demonstrate how the net zero greenhouse gas emissions target will be met. Such a requirement goes beyond national government guidance and has not been justified. Further, the policy should also recognise that meeting the appropriate target may not be achievable in all cases for a number of reasons, including scheme viability. Applying the policy rigidly could therefore have the effect of stifling (rather than encouraging) development undermining the strategic objectives of the Plan.

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.

The wording of Policy CC1 should be redrafted to reflect current national planning policy and introduce an element of flexibility where schemes are not able to meet the energy/emissions targets due to valid, evidenced reasons.

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 checked="" type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input 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:

N/A

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.



SUGGESTED AMENDED WORDING

Policy EC6: Mixed Use Allocations South Ribble

1. The following site is allocated and protected for mixed use development.

Ref	Location	Total Site Area (ha)	Site Area for Housing (ha)	Number of Dwellings	Site Area for Employment (ha)	Employment Use Class
EC6.1	Cuerden	66.00	16.00	220	50.00	E(g), B2, B8
Total		66.00	16.00	220	50.00	

2. Key development considerations regarding Cuerden are set out within Appendix 6. Development meeting these considerations will be supported.

3. Alternative uses may be acceptable where they are clearly demonstrated to be necessary to fund essential infrastructure.

34. A wintering bird survey is required alongside any planning application in accordance with Policy EN7 to provide certainty that the loss of functionally linked land within the site allocation will not adversely affect the integrity of Special Protection Areas (SPAs) and Ramsar sites.

APPENDIX 6 – KEY DEVELOPMENT CONSIDERATIONS

Site Ref	EC6.1
Site Area (Ha)	66
Settlement	Lostock Hall, Farrington East ward.
Amount/type of development (indicative)	Employment led mixed use. Proposed c. 50 hectares of employment land, c. 220 dwellings.
Masterplan	Development of the wider Cuerden site should where possible accord with the adopted Cuerden Masterplan (April 2015) or future versions. The scale of any non-employment development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the delivery and maintenance of the primary employment function of the site. All applications for development, including applications for the approval of reserved matters, should demonstrate that they would not prejudice the delivery of land elsewhere within the Cuerden allocation and where possible enhance the prospects of land elsewhere within the wider site being developed.
Masterplan	Development of the wider Cuerden site should where possible accord with the adopted Cuerden Masterplan (April 2015) or future versions. The scale of any non-employment development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the delivery and maintenance of the primary employment function of the site. All applications for development, including applications for the approval of reserved matters, should demonstrate that they would not prejudice the delivery of land elsewhere within the Cuerden allocation and where possible enhance the prospects of land elsewhere within the wider site being developed.
Planning Obligations (ID2)	A planning contribution is likely to <u>may</u> be required to help mitigate the impacts of development and in line with policy ID2.
Designated Sites for Nature Conservation (EN7)	To provide certainty that the loss of functionally linked land within the site allocation will not adversely affect the integrity of SPA and Ramsar sites, a wintering bird survey is required alongside any planning application in accordance with Policy EN7.
Flood Risk (EN10)	The level 1 SFRA indicates a limited surface water risk on parts of the site, which do not benefit from planning permission. Flood risk should be manageable through careful consideration of site layout and design.
Drainage (EN11)	United Utilities (UU) indicate that the site does not have access to a foul sewer. There is a record of sewer flooding in the vicinity of the site. Early dialogue with UU will be required prior to the submission of a planning application. Attention will be required to drainage within and from the site to ensure that there is no impact on surrounding watercourses.

Heritage assets and archaeology (EN13)	<p>There is a Grade II Listed Building within the site, The Old School House. Depending on location of development proposals, a Heritage Assessment should be provided to assess the impact upon its setting. Mitigation may than be necessary. There were archaeological investigations on the site in 2018.</p> <p>Early dialogue is advised with Lancashire County Council Archaeological Unit prior to the submission of a planning application.</p>
Phasing and Infrastructure Delivery Schedule	<p>A Phasing and Infrastructure Delivery Schedule will be required for any planning subsequent applications, to identify how the site's essential infrastructure will be delivered in a comprehensive manner.</p>
Highways (ST1/ ST2)	<p>Early dialogue is recommended with the Highway Authority, prior to the submission of further any planning applications, to ensure appropriate access and local highway network mitigation is provided. Development layout and scheme detailing should provide good connectivity to the established Public Rights of Way network including mitigation of any adverse impacts.</p>
Ecology (EN9)	<p>Potential ecological impacts must be considered as part of any planning application for developing the site due to its largely greenfield nature.</p>