

Examination of the Central Lancashire Local Plan (2023–2041)

Matter 2.

On behalf of GA Pet Food Partners (Regulation 19
representation ref A2).

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Document Management.

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1. Introduction.

- 1.1. This Hearing statement has been produced by Pegasus Group on behalf of our client GA Pet Food Partners. It focuses upon the Inspectors Matters, Issues and Questions which relate to our previous representations in respect of Matter 2.
- 1.2. GA Pet Food Partners [GA] is a local success story and major employer within Chorley. The business has rapidly grown over the last 30-years supporting over 650 jobs. The growth of GA has been supported from the very beginning, and throughout its development by Chorley Council, who through the encouragement of adopting a 10-year master plan approach allowed for flexibility as the business needs of GA changed. This has given GA the confidence to invest in its people and the physical plant and machinery to develop what is a 'World Class' pet food manufacturing facility. GA has its roots firmly set within Chorley and wants to ensure it continues to prosper in the area.
- 1.3. Over the last 30 years GA has been in a continual state of flux, evolving to keep pace with the needs of the markets, its Partners (customers), and the prevailing economic circumstances. To retain this success and its base within Chorley, GA needs certainty so that it can continue to grow and prosper.
- 1.4. GA currently operates from two main sites at Plocks Farm, Bretherton and Revolution Park, Buckshaw Village. GAs interests in the following sites are integral to its future success:
 - Asland Walks, Bretherton – renewable energy generation and associated community benefits related to the Pocks Farm site. This is discussed in our response to **Matters 2, 12 & 13/Policies SS1, SS2, EN1-EN9 CC1-CC3**
 - Land at Euxton Park Golf Centre (ref: CH/EP1.9) – closely related to its Revolution Park, Buckshaw Village site. This is discussed in our response to **Matters 2, 8 & 9/Policies SS1, SS2 EC1-EC4**
- 1.5. All references to the NPPF are to the December 2023 version, unless otherwise stated. This is due to the plan being examined against this version of the NPPF as required by the transitional arrangements set out within Annex 1 of the December 2024 NPPF. GA wishes to ensure that the Central Lancashire Local Plan (2023–2041) is prepared in a robust manner that passes the tests of soundness contained in paragraph 36 of the NPPF (2024), namely that the plan is:
 - Positively Prepared;
 - Justified;
 - Effective; and
 - Consistent with National Policy
- 1.6. The CLLP also needs to be legally compliant and adhere to the Duty to Cooperate.
- 1.7. Our client submitted representations to the various stages of the plan including the Publication Version. This hearing statement should be read alongside those submissions.

2. Response to the Inspector's Matter 2 Issues and Questions

- 2.1. We welcome the opportunity to comment on the Inspector's Matters, Issues and Questions (MIQs) and provide the following responses to selected questions. Our client reserves the right to respond to specific issues raised by the Council and other parties within the hearing session in so far as they relate to our previous representations.

Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process (Policies SS1, SS2).

2.1-Is the proposed spatial strategy and the distribution of new development and the process by which proposed development sites have been selected for inclusion in the Plan (Policies SS1 and SS2) supported by robust and up to date evidence and otherwise soundly based?

a) Does it reflect the vision and objectives of the Plan?

- 2.2. Overall, we support the vision and objectives set out in the plan, particularly the elements which relate to: *"ambitions on climate change will be being delivered, demonstrating our responsibilities to addressing the climate emergency and the use of resources..."* and *"...ensuring fair access to good quality education and employment"*.
- 2.3. To ensure that the spatial vision is realised the plan must provide a positive planning framework which works for both new and existing businesses. In terms of existing businesses, it is important that the plan enables them to grow and prosper by providing appropriate expansion opportunities in locations where it is needed. This will help to protect existing jobs as well as providing new opportunities. GA's site at Euxton Road, is essential to enable this existing business to expand and prosper.
- 2.4. The Green Belt Review (EV10a–EV10c) does not assess GAs parcel of land at Euxton Park Golf Centre. The Chorley Council administrative area outside of the main towns and villages is largely washed over with Green Belt and there are very limited areas of land outside the Green Belt available for commercial 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. This is the case for employment land in Chorley.
- 2.5. 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 regulation 19 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 full Green Belt assessment in these circumstances is considered unjustified. There are clear examples of land which perform poorly against the purposes of Green Belt which could be released. The Euxton Park Golf Centre is a prime example.

- 2.6. GA 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 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 Lane. 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. This is considered further within the Regulation 19 representations.
- 2.7. This general absence of a coherent and up to date Green Belt analysis suggests that the spatial strategy is not based on a complete or objective review of all available land. Recent ministerial statements from the Housing and Planning Minister, Matthew Pennycook, have clarified that Green Belt land which performs poorly against its defined purposes—often referred to as “grey belt”—should be considered for release where it supports sustainable development. On 13th October 2025 the minister also identified that the Inspectorate, where necessary, can recommend as part of the examination that a Green Belt review is undertaken to consider whether additional sites could be identified, in line with national policy, to meet development needs. This is considered a necessity as part of this examination.
- 2.8. GAs site, whilst located within the Green Belt, is in part previously developed and directly opposite to employment land. Its omission from the site assessment undermines the plan's evidence base and fails to consider the site's potential contribution to both national and local economic policy targets as well as the needs of local business.

b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?

- 2.9. This is considered an issue for the Council to address. However, I refer the Inspectors to our comments made above.

c) Is the focus on the larger urban settlements justified and soundly based?

- 2.10. Overall, it is agreed that the focus upon larger urban settlements is appropriate. Whilst it is reasonable for the Plan to focus growth in urban areas where infrastructure and services are concentrated, this approach must be balanced with ensuring that the development needs of the area, its residents and its businesses are also met. The plan currently fails to do this. In this regard it is considered that a full Green Belt review should have been undertaken.
- 2.11. Due to the lack of a full Green Belt review, the plan fails to fully consider reasonable alternative sites to meet its development needs in full. A good example is GAs site 'CH/EP9' Land at Euxton park Golf Centre'. Within GAs representations upon Policy EC1 of the Regulation 19 plan we note (table 3) 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.

d) How were the proportions of development proposed for each settlement arrived at?

- 2.12. The plan does not clearly explain how development proportions were determined across settlements. The Settlement Hierarchy in Policy SS2 is not supported by a transparent methodology or comparative scoring system.
- 2.13. The SHELAA applied a two-stage filtering process. In Stage 1, sites were discounted if they were affected by high flood risk (Flood Zone 3b), ecological designations (SSSI, SAC, SPA), heritage constraints, or lacked suitable access. While this is a reasonable approach to eliminate clearly unsuitable land, the methodology did not allow for nuanced assessment of mitigation potential or partial site suitability. For example, paragraph 3.3 states that sites partially within the Green Belt were only assessed for the portion outside the designation, and no consideration was given to whether exceptional circumstances might justify Green Belt release. This rigid approach disproportionately affected rural sites and edge of urban area sites, including those with strategic infrastructure potential.
- 2.14. This approach has led to GAs site and need not being adequately considered. Only the small area outside of the green belt has been assessed in either the Strategic Housing and Employment Land Availability Assessment (SHELAA) documents (HO14a–HO14e) or the Site Selection Process (HO15). As page 23 of Appendix 3 of the SHELAA states the *“Site is in the Green Belt. Only the previously developed part of the site was taken forward. The Employment Land Study identifies that it would likely be of negligible interest to local developers.”*
- 2.15. The approach has meant that sites, which would otherwise score well and be attractive to the market, or in our case an identified user, have been overlooked. This has led to an inequitable scoring of sites.

e) Would it provide sufficient development within rural areas and other settlements?

- 2.16. The Plan should consider strategic rural employment and infrastructure sites, such as Plocks Farm and the associated Asland Walk Energy Park.
- 2.17. Additionally, policies SS1 SS2, and Site Selection Process (HO15) also fail to prioritise development that can contribute to renewable energy generation in rural areas such as GAs ‘Asland Walk Energy Park’ in Bretherton. The Integrated Assessment documents (CD05/CD06), which should underpin the spatial strategy, does not include renewable energy infrastructure as a land use category. This omission is significant given the updated national emphasis on climate resilience and the transition to a low-carbon economy in line with recent government legislation, such as the 2030 Clean Power Action Plan.

f) Does the distribution of employment-related development take an appropriate account of national and regional programmes and strategies?

- 2.18. No, the distribution of employment-related development in Chorley, as set out in Policy EC1 of the Regulation 19 draft of the Central Lancashire Local Plan, proposes 41.45 hectares of employment land. While this figure aligns with the Objectively Assessed Need (OAN) identified in the Central Lancashire Employment Land Study – Land Supply and OAN Update 2024 (ERO6), there are substantive concerns about whether this quantum is

sufficient to meet both local and strategic economic objectives, particularly in light of national and regional programmes aimed at stimulating growth in advanced manufacturing, logistics, and low-carbon infrastructure.

- 2.19. This is compounded by the fact that insufficient supply is provided within Chorley to meet the identified OAN. This lack of new supply within Chorley has significant implications for GA who need to expand their existing operation at Revolution Park, Buckshaw Village. The only viable option for GA due to issues of logistics, cost, staff moves, and time is the Land at Euxton park Golf Centre' (Ref: CH/EP9.1). The site on Euxton Lane is owned by GA and would only be used for GAs future needs, it would not be provided for third parties. The alternative to expansion onto the Euxton Lane site would potentially require a wholesale move of its Buckshaw operation elsewhere, this would have a devastating impact on the business operation, severing the close proximity to the production facility at Plocks farm, severing links with the community in the area and undermining the success of Buckshaw Village by having its site vacant. This is not considered a desirable option.

2.2. What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

- 2.20. This is considered an issue for the Council to address. However, the Plan states that the hierarchy reflects the role and function of places, including their level of services, employment opportunities, and accessibility. However, it does not clearly set out the methodology used to assess and rank settlements. Table 1 of the Plan categorises settlements into four tiers, with the Preston Urban Area designated as Tier 1 and rural local service centres as Tier 4. However, as per section 3 of the SHELAA the criteria for inclusion in each tier are not consistently applied across the three authorities, and there is limited explanation of how settlements were assessed against these criteria.
- 2.21. The Plan does not provide a comparative analysis of settlements across the district, nor does it explain how variations in infrastructure, accessibility, or service provision were factored into the hierarchy. The Plan relies heavily on existing urban centres for growth, without adequately considering the potential of other settlements to accommodate sustainable development. This is particularly problematic given the absence of a comprehensive Green Belt review to inform the spatial strategy.
- 2.22. The Green Belt and Landscape Sensitivity Stage 1 Report (LUC, 2022) identifies parcels of land with low harm ratings and limited contribution to Green Belt purposes, yet these findings have not been integrated into the settlement hierarchy or development strategy. The failure to consider Green Belt release as part of the spatial strategy limits the flexibility of the Plan and may result in missed opportunities for sustainable growth in well-connected edge of centre or rural settlements.

2.3 What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Integrated Assessment work?

- 2.23. The Integrated Assessment (IA) Final Report (January 2025) includes some appraisal of spatial strategy options, the range of alternatives tested appears limited and lacks a robust comparative framework. IA identifies a preferred strategy focused on directing growth to

larger urban settlements, but it does not adequately explore other reasonable alternatives including targeted Green Belt release.

- 2.24. The IA outlines three broad spatial strategy options, including a continuation of existing patterns, a more dispersed approach, and a strategy focused on urban intensification. However, the rationale for discounting these alternatives is not clearly articulated in the Plan or supporting documents. The range of alternatives tested was relatively narrow, and there was a lack of spatial scenario modelling to visualise cumulative impacts. Additionally, some options were discounted based on assumed deliverability without detailed feasibility testing, and the IA does not clearly explain how trade-offs between competing sustainability objectives were resolved. These gaps suggest that while the IA provides a reasoned justification for the preferred strategy, there is room for greater transparency and depth in the assessment of alternatives. The evidence presented does not convincingly demonstrate that all reasonable alternatives were tested or that the preferred strategy was selected through a robust and objective process.

2.4 Have the sites allocated for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

- 2.25. The transparency of the site selection process is further called into question by the lack of clarity around how development constraints were identified and applied. Although the SHELAA includes assessments of suitability, availability, and achievability, the methodology does not clearly explain how constraints such as flood risk, access, contamination, or infrastructure capacity were weighted or prioritised. For example, several allocated employment sites—such as EC3.1 (Former Alstom Works) and EC4.1 (Land North of Lancashire Business Park)—face significant constraints, yet their selection is not justified through a comparative analysis with less constrained alternatives such as our client’s site. The absence of a published scoring matrix or decision-making framework makes it difficult to understand how these sites were deemed preferable.

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Planning and Compulsory Purchase Act 2004

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