

Central Lancashire Local Plan 2023-2041

Hearing Statement

on behalf of Maple Grove Developments

Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

Representor: Maple Grove Developments

Representor ID: A37

November 2025

Relevant Site:

Land at Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way,
PR26 6PH

(Site Reference: CLCFS00414 / SHLAA Reference: 19S119)

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1. Introduction

- 1.1 This Statement has been prepared by Hive Land & Planning on behalf of Maple Grove Developments and responds to the Matters, Issues and Questions released by the Inspectors on the 9th October 2025.
- 1.2 This Hearing Statement relates to **Matter 2**, which is consistent with the nature of comments submitted by Maple Grove Developments at each consultation stage.
- 1.3 Maple Grove Developments are participating in the Examination as they are promoting land at Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH (SHELAA reference: 19S119). A Development Statement related to this Site was provided at Appendix 1 to our Regulation 19 consultation response, which provides more details of the future development potential of the Site, demonstrating that it is deliverable and a sustainable location towards which new employment development should be directed.
- 1.4 We trust that this Statement assists the Inspectors in respect of the Examination.

2. Issue 2: Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

Q2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2 supported by robust and up to date evidence and otherwise soundly based? In particular:

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

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

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

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

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

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

- 2.1 It is considered that spatial strategy and proposed distribution of development, notably employment land allocations, are not supported by robust evidence and therefore considered to be sound.
- 2.2 Sub questions b) to e) are primarily for the Councils to respond to. However, in relation to a) and f), Maple Grove Developments set out that the Central Lancashire Local Plan (CLLP) does not fully reflect the wider economic growth ambitions of Lancashire, as set out in the Lancashire Growth Plan (2025–2035) and the Combined County Authority (CCA)'s devolution deal. The CLLP is not positively prepared as it does not support the national, nor regionally, economic growth agenda though the proposals and aspirations of the CCA, particularly in creating the right conditions for business and investor growth and to unlock new development and employment opportunities in the region.
- 2.3 This is explored further in relation to Matters 8 and 9, however, the approach taken to identify the employment land need figure is unambitious and fails to set a clear economic growth vision which positively, and proactively encourages sustainable economic growth having regard to Local Industrial Strategies and other local policies for economic development and regeneration in line with Paragraphs 85 and 86 of the NPPF (2023). The employment land need figure reflects an unambitious baseline of potential employment needs and does not seek to drive economic growth.

- 2.4 Despite this, the Employment Land Study 2024, does highlight the strong market for new employment growth and supply shortages in the region.
- 3.1 In addition, the CLLP does not identify enough land supply across all employment and mixed-use allocations to deliver the employment land requirement across the plan period. In addition, the distribution of employment development does not reflect the identified needs for each authority area, for example, the Employment Land Study 2024 notes that there is a requirement for an additional 25.68 ha of employment land supply in South Ribble, yet only 11.30 ha has been allocated in the CLLP.
- 2.5 It is on this basis that the spatial strategy and the distribution of development is not considered to be supported by robust evidence and to be soundly based. Further detailed commentary on the employment land need methodology, site selection and supply provision is set out in our Regulation 19 representation and in hearing statements for Matters 8 and 9.

Q2.2 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?

Q2.3 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?

- 2.6 The following is MGD's response to Questions 2.2 and 2.3 combined.
- 2.7 The development strategy has been disproportionately influenced by the prioritisation of avoiding Green Belt release over meeting employment land and other development needs and directing development to sustainable locations, and away from flood risk.
- 2.8 The role of the Sustainability Appraisal (SA) / Integrate Assessment (IA) is primarily to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve the fundamental vision and objectives of the Local Plan. Therefore, the SA process should clearly justify its policy choices in meeting the development needs of the area and be clear from the results of the assessment why some policy options have been progressed or rejected. The SA should undertake a comparative and equal assessment of each reasonable alternative.
- 2.9 At the time of the Regulation 19 consultation and submission of the CLLP for examination, key evidence base documents were not available and had not been utilised for SA/IA or site selection purposes.
- 2.10 Fundamentally, if the evidence base for key matters such as, highways and transport, is not available then it is not possible for the SA to clearly justify its policy choices in meeting development needs of the area

alongside undertaking a comparative and equal assessment of each reasonable alternative. Therefore, it is considered that the IA, particularly the SA, fails to meet the requirements of National Planning Policy and Guidance, the 2004 Regulations and the Directive and as a result the Local Plan cannot be considered to be an appropriate strategy for the purposes of the NPPF Paragraph 36.

- 2.11 This is discussed in further detail in our Regulation 19 representation and in hearing statements for Matters 8 and 9.

Q2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

a) Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?

b) Were constraints given relative weight in the site selection process? If so, how was this determined?

c) In relation to flood risk, were sites at low risk preferred over those at greater risk? How did the Strategic Flood Risk Assessment (SFRA) inform site selection? Does the SFRA2 reflect the most up to date flood-mapping? Where sites are proposed for development in areas of flood risk, does the Plan take a sound approach in how these matters will be addressed?

d) What account was taken of Best and Most Versatile Agricultural Land?

- 2.12 No, the site selection and spatial strategy process has not been undertaken using a robust and objective process and to promote sustainable development.
- 2.13 As considered through our Regulation 19 representations and Matters 8 and 9 Hearing Statements, it is evident that the Councils have prioritised avoiding Green Belt release over meeting employment land, and other development needs, and directing development to sustainable locations, and away from flood risk.
- 3.2 Utilising an example to demonstrate the case, the SHELAA profile for 'Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way' (SHELAA reference: 19S119) notes that the site has been withdrawn as an employment allocation (previously identified as a 'Preferred Allocation') due to 'sufficient employment provision has been allocated outside the Green Belt'.
- 2.14 Yet, as considered in response to Q2.1 and throughout our Regulation 19 representations and Matters 8 and 9 Hearing Statement, Policies EC1-6 do not allocate sufficient employment land supply to meet the identified OAN.

- 2.15 In addition, Sites subject to flood risk have been allocated without a robust reflection of the impact of this constraint on potential developable area, and preferred within the site selection process over sites not subject to flood risk or other environmental constraints but which are located in the Green Belt. This is explored further within our Regulation 19 representations.

Q2.5 Does the Plan allow sufficient development in rural local centres, smaller villages and hamlets, rural areas and settlements to comply with paragraph 83 of the Framework? Are the proposed settlement development boundaries up to date and are these appropriately drawn? What factors were taken into account in designating these?

- 2.16 Maple Grove does not wish to comment on this question.

Q2.6 What are the Plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans?

- 2.17 Maple Grove does not wish to comment on this question.

Q2.7 Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?

- 2.18 Maple Grove does not wish to comment on this question.

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