

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

Matters 8 & 9.

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 [GA]. It focuses upon the Inspectors Matters, Issues and Questions which relate to our previous representations in respect of Matters 8&9.
- 1.2. 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. GA is also currently promoting its two sites to meet its future needs:
 - Asland Walks, Bretherton – a renewable energy generation and associated community benefits to enable it Plocks Farm production site transition to net zero. This is discussed in our response to Matters 2, 12 & 13/Policies SS1, SS2, EN1-EN9 CC1-CC3
 - Land at Euxton park Golf Centre – related to GAs future need to extend 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. GA 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 Matters 8 & 9 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. GA 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.

Matters 8 & 9 – Employment Land Need and Allocations (Policies EC1-EC4)

8.1 Is the Employment Land Need figure of 173 hectares for the Plan period justified and are the assumptions and methodology from which it was arrived at soundly based? Does the assessment take adequate account of strategic employment needs, regional and national growth strategies and the specific locational requirements of different sectors.

- 2.2. The Employment Land Need figure of 173 hectares for the Plan period (2023–2041) is not sufficiently justified by the evidence presented or the Regulation 19 Central Lancashire Local Plan. While the Employment Land Study Update (ERO5) and supporting documents attempt to quantify future employment land requirements, the methodology lacks transparency and does not convincingly demonstrate that the figure is soundly based. The assessment appears to rely heavily on past take-up rates and trend-based forecasting, without adequately factoring in the implications of strategic employment growth, sectoral shifts, or transformational programmes such as the Northern Powerhouse or the Lancashire Local Industrial Strategy.
- 2.3. The Employment Land Study uses a hybrid methodology combining past take-up rates and labour demand modelling. For Chorley, the industrial and warehouse OAN is based on net take-up rates, with additional buffers applied to account for vacancy and choice. However, the study itself acknowledges that the labour demand model forecasts negative or negligible land needs in the industrial sector, (paragraph 5.2) which contradicts observed market demand and the development pipeline. This discrepancy raises questions about whether the employment land provision truly reflects the economic ambitions of the borough or the wider sub-regional growth agenda.
- 2.4. Moreover, the Plan does not convincingly demonstrate how the employment land figure and its spatial distribution respond to regional economic priorities. The Lancashire Enterprise Partnership (LEP) has identified key growth sectors and corridors, including clean energy, digital technologies, and advanced manufacturing. However, the Plan fails to show how these priorities have informed the employment land strategy.
- 2.5. For example, GA's site, CH/EPI.9 – Land at Euxton Park Golf Centre, Euxton Lane, Chorley, was only partially assessed with that element recommended for allocation. The site is owned by GA, which it needs for its continued development in Chorley. However, the Employment Land Study only considers the previously developed portion of the site—just 0.69 hectares—which is described as a “narrow, linear plot” with limited market appeal. The study concludes that this portion alone is “likely of negligible interest to local developers” and assigned it a “maybe” rating for allocation.

2.6. This approach fails to recognise the strategic potential of the full site, particularly in light of GA stated operational needs and interest to develop it and the site's location within Buckshaw Village, a location consistently identified by stakeholders as a focus for industrial and warehouse demand. The site's proximity to successful schemes such as Strawberry Meadows further supports its suitability. By not fully recommending CH/EP1.9, the Plan risks missing an opportunity to deliver high-value employment space required by an existing local business need, of regional significance, with a proven track record, of advanced manufacturing, with existing major international exports, that are grown, manufactured and sold from Chorley.

2.7. GAs site at Euxton Lane has the potential to deliver high-value employment aligned with the needs of an existing successful business. This site has not been comparatively assessed against allocated sites, some of which face significant constraints such as finding occupiers, flood risk, contamination, or poor accessibility, due to it being set partially within the Green Belt¹. This is considered a failing of the plan and its evidence base.

8.2 Are the findings of the Employment Land Review in relation to the suitability of existing sites reasonable and are its conclusions in relation to existing supply soundly based? What is the identified supply of existing sites within the 3 Authorities? What is the resulting "shortfall" that the Plan seeks to address for the Plan period?

2.8. The findings of the Employment Land Review (ERO5) regarding the suitability of existing sites are not sufficiently robust to justify the conclusions drawn about available supply. While the Review identifies a baseline of existing employment land across the three authorities, it does not provide a detailed or consistent assessment of site constraints, deliverability, or alignment with strategic sectoral needs. Several existing sites face significant limitations yet are retained without clear justification.

2.9. The methodology lacks transparency in how suitability was determined, and there is limited evidence that the conclusions are based on up-to-date market intelligence or sector-specific locational requirements. As well as up to date local and national policy.

2.10. To ensure soundness, the Councils should revisit the Employment Land Review, reassess the suitability of existing sites, and consider whether additional allocations are required to meet any identified shortfalls or indeed the needs of existing businesses.

Issue 9- Are the proposed employment allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

2.11. Whilst our client does not specifically object to the inclusion of any specific site it is noted that several allocated sites present significant constraints that raise questions about their developability and deliverability. For example, EC3.1 – Former Alstom Works, Channel Way, Preston is a large brownfield site with known contamination issues and complex infrastructure requirements. The site has a history of stalled development and is subject to fragmented land ownership, which may hinder timely delivery.

2.12. Similarly, EC4.1 – Land North of Lancashire Business Park, South Ribble is affected by flood risk and requires substantial investment in utilities and access improvements. These

¹ The site also scores poorly against the Green Belt purposes.

constraints are acknowledged in the SHELAA and Viability Assessment, yet the Plan does not explain why these sites were preferred over less constrained alternatives. Another example is EC3.3 – Roman Road Farm, Preston, which is located in an area of landscape sensitivity and has limited access to strategic transport infrastructure. The site’s rural setting and potential ecological impacts were flagged in the Integrated Assessment, yet it remains allocated without a clear mitigation strategy. These examples suggest that the selection process did not adequately consider the relative constraints of sites or apply a consistent weighting system to assess their suitability. The absence of a published scoring matrix or comparative analysis further weakens the credibility of the allocations.

- 2.13. In contrast, GAs site, Land at Euxton Park Golf Centre, whilst technically being in the Green Belt, offers clear strategic advantages. The site is located adjacent to existing employment infrastructure and is previously developed land whilst also having nearby access to the M61, making it highly suitable for employment uses. It is unconstrained by flood risk, contamination, or access limitations, and aligns with national and regional priorities. It would also be located directly adjacent our client’s existing business in Revolution Park and would meet their future expansion needs.
- 2.14. A small unusable area of the site was considered for allocation but the council failed to adequately assess the full site. Therefore, the site was excluded from the Plan without a transparent justification or comparative assessment against allocated sites. This omission highlights a failure to consider sector-specific locational requirements and undermines the Plan’s ability to respond to emerging economic opportunities.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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