

Central Lancashire Local Plan Examination

Matters, Issues and Questions

Matter 10 – Economic Policies (Policies EC7-14)

Issue 10 – Does the Plan set out a positively prepared strategy and policies for business and industrial development, rural employment, retailing and town centres and the visitor economy which is justified, effective and consistent with national policy?

10.1 Are the requirements of policies EC7- EC14 clear, and would these policies be effective? In particular:

Yes. The policies will provide an effective framework for sustainable growth, whilst also enabling consistent decision-making. The policies clearly set out the requirements that proposals should meet and how these requirements and criteria will be applied.

National Highways commented D16.34 (CD10) on Policy EC7 and in D16.20 (CD10) commented on Policy EC14, indicating that National Highways should be consulted on large scale proposals and on Policy EC7, where smaller scale proposals may have scope to result in cumulative impacts on the SRN. The CLAs consider that the policies are sound as they are and recognise that the CLLP (CD01) should be read as a whole, which contains policies on Sustainable Travel (ST1, ST2, ST3) and Infrastructure Delivery (ID1, ID2, ID3). Where appropriate, National Highways will be consulted as a statutory consultee at the Planning Application stage for such proposals where there may be an impact on the SRN. No modifications are therefore necessary to address these comments by National Highways.

Representation A31.17 F1 Real Estate Management (CD10) supports Policy EC9. Natural England (D26.06) asked for further consideration to be given to encouraging green skills and green jobs. Green Skills Training hours comprise KPI 6 of the latest National Skills Academy for Construction indicators cited in paragraph 5.22 of the explanation to Policy EC9. The modification proposed by Natural England to Policy EC9 is thus unnecessary.

National Highways D16.19 (CD10) support Policy EC13, considering it to adhere to the principles of sustainable development.

Historic England D02.28 (CD10) propose a modification to Policy EC14 bullet 4b concerning enhancing rather than improving heritage assets. The CLAs will continue to work with Historic England through the examination process and through any SOCG prepared.

Natural England D26.07 (CD10) raise cross reference with Policy EN7, which is considered by the CLAs does not require a modification because the CLLP ([CD01](#)) should be read as a whole.

a) Does the reference to Class E in the supporting text to EC7 take appropriate account of the potential effect of permitted development rights for change of use?

Paragraph 5.14 of the supporting text to EC7 defines Class E(g) use as an employment use. The GDPO Class MA and Class ZA could result in existing employment sites / premises being lost, subject to the restrictions, conditions, and limitations on Class MA of Part 3 of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015.

The CLAs are aware of representation A31.16 F1 Real Estate Management (CD10), which raises the potential for loss of employment use, through the ease of compliance with Policy EC7 criteria for sites with viability issues or where premises are of lower quality, but the representation does not object to Policy EC7 criteria a-c in principle.

The CLLP (CD01) was informed by evidence [ER06a](#) and [ER06b](#), that takes potential losses via Permitted Development Rights (PDRs) into account through consideration of likely losses and the use of a 5-year buffer, as detailed in the CLAs response to representation A31.16.

Losses in Central Lancashire through changes of Class E(g) office use to other Class E uses and to residential use, have been focused in Preston City Centre ([ER06a](#), paragraph 3.47: page 88, paragraph 5.13 fourth bullet point: page 160, evidenced in [MO03](#) as detailed below). Preston City Centre is outside the EC7 areas defined on the Policies Map. It is considered this pattern is unlikely to change in the plan period given the existing concentration of surplus lower grade secondary office space in Class E(g) use in the city centre which does not meet the modern requirements of occupiers ([ER06a](#), paragraphs 2.63, 2.129 and page 153 third bullet point of paragraph 5.2). Paragraph 4.10 of MO03 PCC Employment Monitoring Report 2025, shows that in the period 1 April 2021 to 31 March 2025, of 1.74ha of losses of employment use completed outside the EP1 Employment Land Allocations of the Preston Local Plan, 0.49ha (28%) was located in the city centre and 0.9ha (52%) was located in existing

employment areas (EP2 areas). Tables 7 (200sq.m. minimum) and 8 (below 200sq.m.) identify losses of employment use outside the EP1 allocations with extant planning permission, as of 31 March 2025, none of which are in the EP2 Existing Employment areas and 0.77ha (40%) are within the city centre.

MO03 Preston City Council Employment Monitoring Report 2025, [MO01](#) Authority Monitoring Report – Chorley 2023/24 (Table 16) and MO02 Authority Monitoring Report – South Ribble 2023/24 (paragraph 5.19) show loss of employment land to other uses. In Preston this has shown losses of Class E(g) use within the city centre, which is outside the EC7 Existing Employment Sites of the Preston CLLP Policies Map and within EP2 Existing Employment Areas, most of which are carried over to the EC7 designation.

To ensure robust employment monitoring, the employment indicator on [CD01](#) page 187 includes monitoring the loss of allocated employment land to other uses. However, the CLAs have noted an error since submission in that the monitoring indicator only refers to monitoring the loss of employment use within employment allocations and not to employment floorspace losses and gains in general. The CLAs would welcome the following amendment if there is an opportunity to add this to the list of minor amendments (CD03): ‘Loss of ~~allocated~~ employment land **and premises** to other uses’.

b) Have existing employment areas been identified on the basis of up to date and comprehensive information? What factors were taken into account in identifying sites for protection?

Yes, the EC7 existing employment areas have been identified on the Preston and South Ribble Policies Maps on the basis of up to date and comprehensive information. EC7 areas are not designated in Chorley.

The policy seeks to protect existing (often historic or purpose-built) employment areas, sites, and premises from incursion of residential use, which could risk reducing their flexibility, hours of operation and viability. Maintaining a broad range of existing employment areas is important for job opportunities, a diverse economy, growth and to protect the existing employment land supply.

The EC7 areas defined on the Policies Map in Preston and South Ribble are existing areas where employment use is concentrated. Many of these areas have previously been identified in Employment Land Reviews that informed the adopted Local Plans.

Paragraph 4.10 of [MO03](#) PCC Employment Monitoring Report 2025, shows that in the period 1 April 2021 to 31 March 2025, of 1.74ha of losses of employment use completed outside the EP1 Employment Land Allocations of the Preston Local Plan, 0.9ha (52%) were located in existing employment areas (EP2 areas). The Employment Land Study [ER06a](#), paragraph 3.47: page 88 and paragraph 5.13 fourth bullet point: page 160, evidenced in MO03, identifies losses of employment use as a much greater issue in Preston compared to Chorley and South Ribble ([ER06a](#), page 7, paragraph viii and Tables 7 to 9 on pages 67 and 68). This led to the designation of EC7 areas in Preston and South Ribble on the Policies Map to provide more detailed monitoring information on losses of employment use.

South Ribble and Chorley have experienced much less employment area loss compared to Preston. Whilst South Ribble has an adopted employment area, there have been no completed schemes on the area's boundary which would necessitate it being reviewed. Consequently, South Ribble's employment areas are identified by simply carrying over adopted policy. Chorley meanwhile does not have an adopted employment area. Due to its relatively low levels of employment loss, introducing a new employment area through the CLLP would not be justified.

The employment areas in Preston were identified through the following methods which show that EC7 Existing Employment Sites were identified on the basis of up to date and comprehensive information. This process carried over employment designations in the adopted Preston Local Plan and in the Inner East Preston Neighbourhood Plan (made April 2015, employment allocations LEES1: Harrison's Bakery and LEES2: Maitland Mill) and updated these with information from aerial photos and employment monitoring data to show where allocations had been taken up for employment use and where existing employment sites had expanded or contracted:

1. Designating the adopted Preston Local Plan EP1 Employment Land Allocations that had been taken up for employment use as EC7 Existing Employment Sites, such as at Red Scar Industrial Estate which adjoins the CLLP EC3.2 and EC3.3 employment land allocations. Employment land take-up data was sourced from employment land monitoring data ([MO03](#)) which had informed take-up data in the BE Group Employment Land studies; and
2. Updating the EP2 Existing Employment Sites and the EP2 Other Urban Employment Sites designations of the adopted Preston Local Plan Policies Map. This update was informed by changes visible from aerial photographs and where housing monitoring and employment monitoring data ([MO03](#)) indicated any major losses or completions for employment use affecting the boundary of

these designations. The boundary of these designations was then adjusted to reflect the existing extent of concentration of employment sites, for example proposed amendment PM08.02 removes the existing Fulwood Retail Park at Olivers Place from the EC7 boundary.

3. SS4 Strategic Site Allocation Fulwood Barracks is an EP2 Other Urban Employment Site allocation in the Preston Local Plan, which is not allocated as EC7 because paragraph 5 of Policy SS4 indicates the site for residential use and the existing use is outside the Classes E(g), B2 and B8 use, as detailed in D11.2 [CD10](#) and Mapping Correction PM08.03 and PM16 in [CD04](#).
4. In response to representation D10.2 (CD10), the Ironworks site, under the control of the University of Lancashire, was removed from the EC7 designation by PM17 (CD04).
5. Inner East Preston Neighbourhood Plan (made April 2015, employment allocations LEES1: Harrison's Bakery and LEES2: Maitland Mill):
 - At LEES1 there is no planning history resulting in any loss of employment use to non-employment uses since the Inner East Neighbourhood Plan was made in 2015 and so this boundary did not require changing and the site is shown as within an EC7 Existing Employment Sites area on the Policies Map.
 - At LEES2: Maitland Mill, Maitland Street, the site is not designated as EC7 on the Policies Map and is not designated as an EP2 Existing Employment Sites or EP2 Other Urban Employment Sites on the adopted Preston Local Plan Policies Map. 0.2ha is under construction for housing (App Ref: 06/2020/0365) outside the existing employment buildings, referenced in [MO04](#). [MO03](#) found 0.09ha (941sq.m.) of the second floor of Maitland Mill was proposed for a gym, which has since completed (App Ref: 06/2024/1218). The LEES2 allocation in the Neighbourhood Plan no longer stands given these losses. Any further loss of employment use at the site would be monitored by the proposed amendment to the Employment monitoring indicator on [CD01](#) page 187, mentioned in the response to 10.1(a) above. Policy LEES1 of the Neighbourhood Plan encourages the development of small-scale social enterprises and other local enterprises at sites LEES1 and LEES2 to help to increase jobs and provide training and education facilities. So, the Inner East Preston Neighbourhood Plan supports local uses within sites LEES1 and LEES2 which benefit the community,

therefore development to date is in accordance with that and LEES2 is not designated as EC7.

c) In relation to policy EC8 how would the criteria in relation to agricultural produce packing and distribution facilities be assessed?

Policy EC8 criteria 4 includes three tests to ensure that new or major extensions to agricultural produce packing and distribution facilities do not compromise the character of rural areas. To fulfil these tests, statements should be provided, detailing:

- the nature of the existing/proposed business operation to fulfil criteria b) and c) and;
- to fulfil criterion a), a review of whether any alternative sites are available within nearby employment areas (defined by Policy EC7) or employment allocations, which could accommodate the proposed business operation. The review should include estate agency advertisements/enquiries and not discount alternative sites simply because they are not owned by the applicant. Note that Policy EC7 or the allocation designation makes agricultural produce packing sites in these locations (more) 'suitable' by default.

Criteria b) and c) will usually be secured by planning condition.

When assessing a scheme against criteria a), a professional judgment will be necessary depending upon the site's proximity to an area covered by Policy EC7 or an employment allocation. The nature of the food and possible highways impacts may mean that packing and distribution facilities located far from the urban area are best suited to a countryside location. Equally however, if there is opportunity for peri-urban businesses to be drawn closer to the urban area (pursuant to sustainable development), then criterion a) creates scope for the councils to encourage this.

d) In relation to policy EC10 is the policy sufficiently clear as to how proposals on land adjoining the UClan site will be considered?

Policy EC10 clearly refers to development within the EC10 area and adjoining the EC10 area. The EC10 area is defined on the Policies Map ([CD02s](#)). Development of new facilities or the redevelopment and renewal of existing University of Lancashire facilities will be supported for educational uses, or any other appropriate complementary uses as listed.

Further to this, proposals for student accommodation, outside the designated University of Lancashire area but within the EC10 area, will be considered using the criteria listed, as supported by paragraph 5.35 of the explanatory text to Policy EC10 (CD01). Proposals will consider supply, demand, type, density, and surrounding uses.

This policy has been carried forward from the existing Policy HS6 in the Preston Local Plan which has been effective in controlling student accommodation development outside of the University boundary.

The Preston Housing Need and Demand Assessment (ARC4, December 2022, HO07) summarised in paragraph 4.74 the findings of the Student Housing Need Assessment (2019, Cushman and Wakefield) and in paragraph 4.75 its suggestions to inform future policy, with paragraph 4.86 identifying an oversupply of student accommodation and gaps in the quality of purpose built student accommodation. Paragraph E.43 confirms most student accommodation in Preston is located in the city centre. Paragraphs 4.68 to 4.69 of the Preston HDNA 2024 Update HO11 reiterate paragraphs 4.74-4.75 of HO07.

The current policy has been successfully applied and used for refusal of student accommodation, including at city centre sites, on a number of occasions; this information can be provided to the Inspectors upon request.

The CLA's welcome the support of the University of Lancashire for Policy EC10 (D10.3, CD10) and note (D16.17, CD10) that National Highways wish to be consulted on any large student accommodation proposals to reduce the impact on the local road network and therefore potential impact on the Strategic Road Network.

e) In relation to policy EC11 is the Town Centre Hierarchy based on up-to-date evidence and is it sound? In relation to Primary Shopping Areas, does the policy and supporting text take appropriate account of the potential effect of permitted development rights for change of use? How were the thresholds for retail and leisure impact assessments defined? Is the policy sufficiently clear as to what is meant by edge of centre and out of centre locations?

In relation to policy EC11 is the Town Centre Hierarchy based on up-to-date evidence and is it sound?

Yes, Policy EC11 is based on up-to-date evidence and is sound. The policy is based on the recommendations in table 5.2 of the Nexus Planning Retail Study 2025 ER07a. This takes into consideration the amount of retail floorspace / units provided in these

centres as assessed in the centres' health checks within the Retail Study provided at ER07b, ER07c and ER07d, following NPPG guidance on indicators of centre vitality and viability.

In relation to Primary Shopping Areas, does the policy and supporting text take appropriate account of the potential effect of permitted development rights for change of use?

Although Policy EC11 and its explanatory text does not mention permitted development rights (PDRs), it is considered that Policy EC11 takes appropriate account of their potential effect on Primary Shopping Areas. There is scope in Central Lancashire for the loss of Class E(a) use at street level within Primary Shopping Areas, Primary Shopping Frontages and within centres in the EC11 Town Centre Hierarchy, to other Class E uses and through the General Permitted Development Order Class MA to Class C3 residential uses.

Paragraphs 2.20 and 3.39 of the Retail Study [ER07a](#) summarise PDRs between Class E(a) and residential use generally and paragraphs 3.40 to 3.41 acknowledge the scope for PDRs to undermine the essential core of a primary shopping area. NPPG Ref ID: 2b-007-20190722 revised 18/09/20 provides an overview of PDRs in town centres and in respect of temporary uses in Ref ID: 2b-008-20190722, revised 18/09/20.

The CLAs do not have any Article 4 directions limiting PDRs that allow for change of use from Class E use to residential, in respect of the first bullet point of NPPF (2023) paragraph 53, on the use of Article 4 directions to remove PDRs.

Loss of Class E(a) retail use within Primary Shopping Areas would be covered in Retail Study updates over the Plan Period as part of centre healthchecks of centre viability in accordance with the diversity of uses indicator in NPPG Ref ID: 2b-006-20190722, revised 22/07/19. The current position on the location and amount of convenience and comparison goods uses, both within Class E(a) use in the Primary Shopping Areas, is in the diversity of use tables and plans within [ER07b](#) (pages 2, 10, 12, 17, 19 and 24) with the units breakdown in [ER07d](#) which also covers the District Centres and Local Centres. This can be compared to the findings of previous Retail Studies or monitoring data to indicate whether PDRS have negatively impacted the proportion of retail use (now Class E(a) use, previously Class A1 use) in Primary Shopping areas.

How were the thresholds for retail and leisure impact assessments defined?

The thresholds for retail and leisure impact assessments were assessed and defined through the findings of the Nexus Planning Retail Study 2025 [ER07a](#). This takes account of the size of the Local Centres and District Centres and of units within these centres by floorspace set out in [ER07d](#). In particular, refer to ER07a Chapter 5, pages 36-41.

Is the policy sufficiently clear as to what is meant by edge of centre and out of centre locations?

In respect of the clarity of Policy EC11 on the definition of edge-of-centre and out-of-centre development, the NPPF (2023/2024) glossary defines ‘edge of centre’ as:

‘For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.’

The NPPF (2023/2024) glossary identifies out of centre as: ‘A location which is not in or on the edge of a centre but not necessarily outside the urban area.’

Except for Preston City Centre, the NPPF (2023/2024) definitions of edge of centre and out of centre are considered to suffice for assessing whether planning application sites are edge of centre or out of centre for the purpose of the NPPF (2023/2024) sequential test for main town centre uses in relation to centres in Policy EC11. Policy EC12 provides further clarity to these NPPF (2023/2024) definitions for Preston City Centre. The city centre is sequentially preferable for main town centre uses except for Class E(a) use, which is sequentially preferable in the Primary Shopping Area followed by Queens Retail Park. Queens Retail Park is located in the city centre boundary and is functionally edge of centre with an important role for the city centre in providing larger scale retail units. The entrance of Queens Retail Park is over 300 metres from the Primary Shopping Area and is considered does not meet the NPPF (2023/2024) definition of edge of centre for the purpose of retail development, which necessitates its identification in Policy EC12 for the purpose of the sequential approach to Class E(a): Shops use to take account of local circumstances. These same boundaries would be used for considering whether the Local Impact Assessments for Retail Use and Leisure use are triggered.

For A16 on Policy EC11, any revised scheme for Cottam District Centre with reduced Class E use which addresses any viability issues in delivering a district centre can be considered through the planning application process. The position still stands that no detailed information has been provided to support a change to the Cottam District Centre allocation. The principle of the provision of Cottam District Centre has been established under extant hybrid planning permission App Ref: 06/2019/1451 and App Ref: 06/2022/1157 pursuant to 06/2019/1451, which approved removal of condition no.30, approved 27/03/25. The construction management plan (condition no.5 attached to hybrid approval 06/2019/1451 was part discharged on 20/03/25. Preston City Council has engaged in conversation with parties regarding the future use of the former Cottam Brickworks site and welcome continued dialogue on the site.

Representation A63.15 (CD10) considers that Policy EC11 has scope to indirectly limit flexibility for other Class E uses outside Class E(a) use in centres by prioritising their retail function. These comments are noted. Policy EC11 allows for retail and other main town centre uses in a range of centres, ensuring flexibility.

A66.1 Brookhouse Group proposes a modification to Policy EC11 (5.42) to replace the phrase ‘must be refused’ with ‘should be refused’ to align with NPPF (2023/2024). If the inspectors consider this amendment would align better with the NPPF, the CLAs would have no objections.

In response to Fylde Council (D01.4), [CD10](#) notes the concerns expressed and have met and discussed these points with Fylde. A SOCG has been prepared which addresses concerns raised and no modifications are required to Policy EC11.

f) In relation to policy EC12 is the reference to Class E(a) consistent with national policy? Should the Horrocks Quarter Opportunity Area be defined on the proposals map? Is the approach to ancillary uses soundly based? Should sites for education be identified on the policies map?

Historic England (D02.27) proposed a modification to Policy EC12 which is addressed by proposed minor amendment MA15 (CD03). Lancashire and South Cumbria Integrated Care Board (D13.1) and National Highways (D16.18) support Policy EC12. Proposed minor amendment PM07 (in CD04) addresses representation A04.3, for the Stoneygate Regeneration SPD boundary (ER11, Figure 1) to be mapped on the Policies Map, which covers the Horrocks Quarter (OP5 area) and Stoneygate Opportunity Area (OP4 area, ER11, Figure 2) of the adopted City Centre Plan Policies Map (ER10).

In relation to policy EC12 is the reference to Class E(a) consistent with national policy?

Proposed minor amendment MA14 ([CD03](#); [CD04](#)) to Policy EC12(5) refers to main town centre uses instead of to specific main town centre uses and to Class E(a) use to be consistent with the NPPF (2023/2024). This addresses part of representation A66.2.

Should the Horrocks Quarter Opportunity Area be defined on the proposals map?

The Horrocks Quarter Opportunity Area and Queens Retail Park are located within the city centre but outside the Primary Shopping Area as assessed by Nexus Planning in [ER07a](#) as shown in the study recommendations in [ER07g Appendix 6 – Centre Boundaries](#).

Policy EC12(6) identifies the Horrocks Quarter as the next sequentially preferable location for Class E(a): Shops use after the Primary Shopping City of the city centre. Queens Retail Park is an existing concentration of retail units within the Horrocks Quarter mentioned in EC12(7). Most of the Horrocks Quarter outside Queens Retail Park contains housing allocations (HS4.6, HS4.21, HS4.8), where HS4.6 has extant outline planning permission, approved 22/03/24, for a housing led proposal involving small scale Class E use App Ref: 06/2023/0818. However, neither Queens Retail Park nor the Horrocks Quarter is defined on the Preston City Centre Policies Map 3.2 [CD02t](#). The response to 10.2 below proposes an amendment to add the boundary of the existing Queens Retail Park to [CD02t](#) to identify it as sequentially preferable for Class E(a) Shops use after the Primary Shopping Area. This amendment will create consistency with the location and purpose of the city centre housing allocations. Therefore, mention of the Horrocks Quarter should be removed from EC12(7). An amendment is thus also suggested to EC12(6) to replace the words ‘Horrocks Quarter’ with ‘Queens Retail Park’, which helps to address representation A66.2.

No, it is not considered necessary to define the Horrocks Quarter Opportunity Area (Policy OP5 of the adopted Preston City Centre Area Action Plan (2016-2026), page 118, ER09d and ER10) on the Policies map [CD02t](#), consistent with the approach taken to the other Opportunity Area Policies OP1-OP4 of the adopted City Centre Plan Policies Map (ER10). The council will seek to review the City Centre Plan (ER09a, ER09b, ER09C, ER09d and ER10) post adoption of the CLLP. Identification of Opportunity Areas on the [CD02t](#) Preston City Centre Policies Map could place undue constraints on a review of the Action Plan Areas within any future City Centre Supplementary Plan.

For consistency with the above reasoning, a further minor amendment is proposed to delete reference to the Horrocks Quarter in EC12(6) and EC12(7) of [CD01](#).

Is the approach to ancillary uses soundly based?

The exception in Criteria 7 of Policy EC12 of ancillary uses within existing main town centre uses units at Queens Retail Park is considered to be soundly based as it is unlikely ancillary would exceed 500sq.m. (gross) within existing retail units in this location. This exception is consistent with the Policy EC11 criterion 7 threshold for requiring Retail Impact Assessments for proposals in Preston City Centre. Furthermore, Queens Retail Park contains a Costa Coffee unit and a 139sq.m. retail pod with external seating north of Costa Coffee has extant consent (App Ref: 06/2025/0087 and 06/2025/0750) which appears from the proposed plans is intended for a standalone food and beverage unit (Greggs).

Should sites for education be identified on the policies map?

No, existing sites for education should not be identified on the policies map, other than The University of Lancashire is defined on the Policies Map in Preston to support the growth of the university within that prescribed area and to enable control of Purpose-Built Student Accommodation. This approach is consistent with the approach taken across the CLLP area where primary, secondary and further education providers are not mapped as education uses, other than sites listed within paragraph 3 of Policy HC3 of [CD01](#) and shown on the policies map of CD02 as to safeguard land for future provision. Site HC3.1 is shown on policies map [CD02j](#), sites HC3.2 to HC3.7 are shown on policies map [CD02s](#) and policies map [CD02r](#), site HC3.8 is shown on policies map [CD02w](#) and HC3.9 is shown on policies map [CD02v](#).

10.2 Are there any omissions in the policies and are they sufficiently flexible?

Please refer to the response to 10.1(f) which shows that Queens Retail Park needs to be added to the Preston City Centre Policies Map as a proposed minor amendment to show the area of the City Centre referred to in Policy EC12 that is sequentially preferable for Class E(a) Shops use after the Primary Shopping Area (for clarity this change is not proposed in [CD04](#)). This will be necessary for clarification of the boundary of Queens Retail Park for the application of the sequential test for Class E(a) use within Policy EC12. The response to 10.1(f) proposes corresponding minor amendments to EC12(6) as follows:

‘6. The Primary Shopping Area, followed by Queens Retail Park ~~the Horrocks Quarter Opportunity Area~~, as shown on the policies map, is the sequentially preferred location for Class E(a) Shops within the City Centre of up to and including major scale

development. Proposals within the Primary Shopping Area should comply with Policy EC11.

7. Within the Queens Retail Park and the Horrocks Quarter of the City Centre, ancillary customer cafes, ancillary customer restaurants, and ancillary concession operators will be appropriate uses within existing Class E(a) retail units.’

The CLAs have noted an error since submission in that policy reference EC10: Town Centre Hierarchy in the column next to policies E3, E4 and E5, on page 279 of the CLLP (CD01), is proposed as a minor amendment to the list of superseded policies as a factual change to correspond with the policy reference on page 95 of CD01 and its contents page. The minor amendment proposed is:

| | |
|-------------------------|---|
| E3: Leyland Town Centre | EC11 (Strategic Policy) EC10: Town Centre Hierarchy EC13: Development in Leyland and Chorley Town Centres |
| E4: District Centres | EC11 (Strategic Policy) EC11 EC10: Town Centre Hierarchy |
| E5: Local Centres | EC11 (Strategic Policy) EC11 EC10: Town Centre Hierarchy |

10.3 Are the Council’s proposed modifications to these policies and the supporting text necessary for soundness?

Whilst not needed for soundness, the changes proposed in 10.1(a) provide clarity to the employment monitoring indicator for CD01 (page 187), to ensure it includes monitoring the loss of employment use outside the Employment Land allocations, and to identify Queens Retail Park for the reason set out in answers 10.1(f) and 10.2.

Whilst not needed for soundness, the amendments proposed in 10.2 include a proposed minor amendment to correct an error in the policy reference number for the Town Centre Hierarchy policy in the list of superseded policies in CD01, from EC10 to EC11.