

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

## Matter 12.

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 Matter 12.
- 1.2. GA is 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. Our client currently operates from two main sites at Plocks Farm, Bretherton and Revolution Park, Buckshaw Village. GA also has interests in two further sites that it sees as essential to its future success:
  - Asland Walks, Bretherton – a renewable energy generation site and associated community benefits required by its production facility at Plocks Farm to 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 (ref: CH/EP1.9) – related to its Revolution Park, Buckshaw Village facility. 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 12 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.

### **Matter 12– Environment Policies– (EN1-EN19)**

***Issue 12.13 Are the requirements of Policy EN15 clear, effective and consistent with national policy. In particular:***

***a) How were the thresholds identified in the policy arrived at?***

***b) Would Policy EN15 provide an effective basis for directing a decision maker in light of the changes to national policy in the NPPF December 2024?***

2.2. Policy EN15 sets out the local interpretation of national Green Belt policy, aiming to clarify the application of the NPPF's closed list of development typologies considered "not inappropriate" in the Green Belt. While the policy attempts to provide helpful guidance, its soundness is questionable due to a lack of clear justification for the thresholds it introduces and limited evidence of alignment with the NPPF (December 2023). It lacks clarity on how proposals that fall outside the listed exceptions will be assessed, particularly in relation to "very special circumstances." The policy's reference to major developed sites within the Green Belt such as InBev Brewery, and the Blackburn Wastewater Treatment works at Salmesbury, (we believe it should also directly mention our clients Plock Farm site as it meets the criteria) is helpful, but it does not provide a robust framework for assessing expansion proposals beyond stating that operational necessity will carry "substantial weight."

2.3. Within our Matter 2 statement we identify that a Green Belt review should have been undertaken to meet the objectively assessed need for employment land within Chorley. We also discuss the recent comments made by minister Matthew Pennycook which provides Inspectors with scope to instruct local authorities to conduct a Green Belt review where necessary for soundness. We respectfully consider this to be relevant in this instance.

2.4. In conducting such a review, the Council would need to have regard to Green Belt land which poorly fulfils the purposes of the designation, referred to as Grey Belt within the December 2024 version of the NPPF. It is considered that if our clients entire Euxton Lane site was assessed it would fail to perform strongly against 3 of the 5 green belt purposes. We consider this in detail within our Regulation 19 comments. Noting that in relation to urban sprawl (Purpose A) there is existing development along Euxton Lane (such as Runshaw College) and Revolution Park is north of the railway line. Further development in this area would be a logical 'rounding off' of the developed area. The site when viewed in context is surrounded on three sides by commercial activity. The logical boundary in this area is Euxton Lane.

2.5. In relation to Purpose B, as discussed in the PPG this purpose strictly relates to the merging of towns, not villages. Euxton is identified as a tier 3 settlement within the settlement



hierarchy (Policy SS2) and as such not considered a town. The merging with Chorley is, therefore, not relevant. The development of Revolution Park and forthcoming development of allocation EP1.3 has already significantly eroded the gap between Euxton and Chorley, north of Euxton Lane. The current frontages of the Golf Centre and football training area do little to preserve a feeling of openness. The main area of separation is south of Euxton Lane. The towns of Chorley and Euxton have already been joined by the development of Buckshaw Village and Revolution Park. This joining has been further reinforced by the development at Strawberry Fields. Finally, regarding Purpose D, the site does not provide views in or out of the historic core of Chorley or indeed any other historic assets.

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

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