



Hearing Statement Central Lancashire Local Plan Examination Matters, Issues and Questions

Clients: Reaper Limited and Hulton Land Ltd (R&HL); GA Pet Food Partners Estates Ltd and Hulton Land Ltd (GA&HL).

Introduction

1. This Hearing Statement (HS) is written following the submission of Consultation Statements (CS) on the Regulation 19 Pre—Submission Plan in April 2025. Please note that the CS were submitted by Edgeplan.
2. As requested, the following MIQ responses directly relate to the previously submitted written representations and are proportionate, taking account of the ability to rely on previous representations. Furthermore, the MIQ responses have had regard to the Councils' response to the CS, as set out in CD10 (Councils' Representation Summary and Council's Action / Comments).

Matter 12 – Environmental Policies

Issue 12 – Does the Plan set out positively prepared policies in relation to the environment which are justified, effective and consistent with national policy?

Q12.5 Are the requirements of Policy EN5 clear and would they be effective? On what basis were the sites allocated for Green Infrastructure both within the policy and on the policies map?

3. R&HL has an interest in land off Brindle Road, Bamber Bridge which is designated as Green Infrastructure (GI) on the Policies Map. The CS stated that the GI designation is not justifiable and as such, the emerging Local Plan (eLP) is not sound.
4. The Councils responded to this in CD10. However, the responses demonstrate that the eLP, in this specific regard, is not justified.
5. The Councils response to Rep ID A58.1 in CD10 is as follows:

“The Plan allocates sufficient land for housing and employment growth. It is therefore unnecessary to review the area’s existing provision of Green Infrastructure.”

6. The Councils response to Rep ID A58.3 in CD10 is as follows:

“The plan allocates sufficient land for housing and employment growth without the need to review the area’s provision of Green Infrastructure.”

7. This approach is considered unreasonable.
8. If the eLP is not revised, the land off Bamber Bridge will once again be retained as GI (it appears that this happened for the previous Development Plan, as set out in the CS) simply because the Councils have not assessed its GI merits because they consider that they have enough land for housing (the Councils will of course need more housing to meet the Standard Method requirement). This is not a positive approach and nor is it justified.

9. It is suggested that, had this site been promoted for development earlier in the eLP process, the Councils may have assessed its GI merits in detail and would have found that the site is not GI. Rather, it is a very well contained parcel of land that is effectively 'white land' and is entirely appropriate for residential development.
10. Sites such as this (in terms of its affinity with the existing built up area) are a finite resource and would surely be sequentially preferable to some of the proposed allocations.
11. It is noted that documents EV23 – EV26 have recently been uploaded onto the Examination Library (Open Space Assessments DRAFT, dated October 2025 – uploaded in November 2025). The CS pointed out that the land off Bamber Bridge had not been assessed in the 2020 Open Space Assessment. It appears the land has once again not been assessed in EV23/EV26. However, the mapping that accompanies these documents is not available to review.
12. It is suggested that this mapping should be uploaded onto the Examination Library so that it can be determined whether the Councils have assessed fully the merits of this land for retention as GI in the eLP (or not). It may then be necessary to make further written submissions on the assessment, if one has been done, though it is considered likely that this could be addressed verbally at the relevant Hearing session.
13. It remains our opinion that the GI designation is not justifiable and as such, the eLP is not sound. The site is simply not GI and should not be designated as GI but rather is wholly suitable for residential development. The site could be designated as 'white land' rather than being allocated for housing, if omission sites are not being considered during the eLP process.

Q12.16 Are the requirements of Policy EN18 clear, effective and consistent with national policy? In particular:

- a. **Is the policy supported by robust and up to date evidence to justify the policy?**
- b. **How is it to be applied alongside Policy EN17?**

Land off Whittingham Road, Longridge

14. GA&HL have an interest in land off Whittingham Road, Longridge. The front parcel is set to form part of the urban area having been removed from the Area of Separation (AoS). The rear parcel is set to remain in the AoS, as shown on the Policies Map. It is considered that the Council is correct to remove the front parcel from the AoS, but that the AoS designation, in its entirety, is not justifiable and, as such, the eLP is not sound.
15. The Councils response to Rep ID A57.1 in CD10 is as follows:

“The Councils support a brownfield first approach and promotes development in the most accessible and sustainable locations. The guiding principles of EN18 is to protect areas where there is a risk of coalescence as set out within Criteria 1 of policy EN18. Further, Criteria 2 of the Policy permits development within the AoS, where proposals meet the outlined assessment requirements.”
16. It is considered that upon visiting the site, it will become apparent that there would be no risk of coalescence if it were to be removed from the AoS. The well contained and sustainably located site makes an extremely limited or no contribution to the character and function of the AoS. The AoS evidence is not sufficiently robust.

Land off Longridge Road, Grimsargh

17. R&HL have an interest in land off Longridge Road, Grimsargh, which forms part of an AoS on the Policies Map. It is considered that the AoS designation, in its entirety, is not justifiable and as such, the eLP is not sound.

18. The Councils response to Rep ID A57.1 in CD10 is as follows:

“The omission site is assessed as being located within a ‘Fragile’ gap strength between Preston and Grimsargh.”

19. As stated, R&HL agree that there should be an AoS in this location. However, the development form proposed by R&HL had not been assessed by the Councils prior to the CS being submitted at Regulation 19 Stage. It is appreciated that the site was put forward late in the process, but it is considered that the Councils should respond to the development form proposed, which demonstrates that part of the site could be delivered in a sustainable manner, while providing numerous benefits, as set out in the CS, including land that could be designed for BNG¹.

Conclusion

20. It is considered that the plan is not sound for the reasons set out above and in the previously submitted CS.

21. Maybern Planning and Development intends to participate in the Matter 12 Hearing Session on behalf of R&HL and GA&HL. Prior to the Hearing Session, it would be helpful if the mapping for EV23 – EV26 could be uploaded onto the Examination webpage.

22. Please contact Maybern Planning and Development should any further information be required.

¹ It should be noted that the Councils response to Rep ID A56.2 states that *“the provision of a Habitat Bank for BNG at the proposed location would be welcomed, as it is recognised that local off-site Biodiversity Units would be required to support local development to meet their 10% gain objective”*.