

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

Matter 13.

On behalf of GA Pet Food Partners (Regulation 19 representation ref A2).

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Authors: Alfie Gill-Hannan & Matthew Good



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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 13.
- 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 13 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 13–Climate Changes Policies (CC1–CC3)

Issue 13.1 Are the requirements of Policies CC1- CC3 clear, effective and consistent with national policy? In particular

a) Have the requirements of policies CC1–CC3 been appropriately considered within the Whole Plan Viability Appraisal and what are the anticipated cost implications of the policies?

- 2.2. Policies CC1 to CC3 of the Central Lancashire Local Plan set out a strong strategic commitment to tackling climate change through net zero development, renewable energy generation, and energy efficiency. Policy CC2, in particular, supports proposals for decentralised renewable energy, district heating networks, and community-led energy initiatives. However, much of the Central Lancashire Local Plan area, in particular Chorley Council area is 'washed over' with Green Belt. Where renewable energy generation infrastructure may be considered to be inappropriate and would need to demonstrate 'very special circumstances' if projects are to proceed.
- 2.3. Paragraph 156 of the National Planning Policy Framework provides 'such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources'. This should be recognised within the policy. In order for the Policy to be compliant with National Policy, the following amendment should be incorporated into Policy CC2. The addition of an item (4) should be added to the base of the policy as follows: *-Renewable energy projects in the Greenbelt will need to demonstrate very special circumstances if projects are to proceed. Special circumstances may include the environmental benefits associated with increased production of energy for renewable sources.*
- 2.4. Secondly, whilst the policy framework is ambitious and broadly consistent with national policy, the Plan fails to demonstrate how these aspirations have been translated into spatial allocations or supported by a robust site selection process. This lack of spatial and viability alignment undermines the credibility of Policies CC1–CC3. Without identifying and safeguarding suitable sites for renewable energy infrastructure, the Plan risks failing to deliver on its climate ambitions. To ensure soundness, the Councils should revisit the site selection process, assess omission sites for their renewable energy potential, and provide clear evidence that the climate policies are both spatially deliverable and supported by the viability framework. Sites such as GAs at Asland Walks provide a perfect opportunity for the councils to realise their ambitions in relation to renewable energy generation.
- 2.5. The Integrated Assessment (Appendix Two of the Regulation 19 submission) includes a Sustainability Appraisal that acknowledges the importance of CC1–CC3 in achieving net zero targets and supporting the transition to a low-carbon economy. This importance



needs to be provided more prominence in the plan to support projects such as GAs Asland Walks Energy Park.

- 2.6. The Energy Park proposes a 12 MW solar array, a 4.2 MW wind turbine, and a 5MW battery storage facility, with 5% of the electricity generated being supplied to the local community via a cooperative model. The project aligns directly with the objectives of CC1–CC3 and the broader climate strategy of the Plan. Yet, because renewable energy infrastructure is not treated as a land use category in the site selection process no consideration has been given to the benefits of sites such as this.

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

Leeds

5th Floor (East), Capitol, Russell Street,
Leeds. LS1 5SP
T 0113 2878200
E Leeds@pegasusgroup.co.uk
Offices throughout the UK

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