

20 January 2026

Central Lancashire Local Plan Programme Officer
Pendragon House,
1 Bertram Drive,
Meols,
Wirral,
CH47 0LG

Email: programme.officer@chorley.gov.uk

Dear Madam

Maple Grove Developments Limited
Representor ID: A6
Cuerden Mixed-Use Allocation (Policy EC6)

We write in relation to the above, following our letter dated 23 December 2025 and the Programme Officer's subsequent email dated 6 January 2026 setting out the Inspectors' response.

We welcome the acceptance of our letter and acknowledgement that it provides a useful summary of our position (alongside our Hearing Statement) as to why Cuerden should be allocated as a 'Strategic Employment Site'. We also welcome the opportunity to provide additional comments on the detailed wording of Policy EC6.

We set these out in the remainder of this letter (and attached Appendix) which should be read in conjunction with our Hearing Statement and letter dated 23 December 2025.

Policy EC6 — Mixed Use Allocations South Ribble & Appendix 6 — Key Development Considerations

Notwithstanding our position that Cuerden should be identified as a Strategic Site, we nonetheless support the allocation of the Site for development. In allocating the Site, it is clear that the Site's constraints have been appropriately taken into account and robustly considered and that there is clear evidence that the allocation is developable and deliverable in the plan period. The allocation is therefore justified and developable.

However, should the current planning permission not come forward or if it needs to be amended for any reason, it is important that the policy contains sufficient flexibility so that it doesn't undermine or stifle the future development of the site (and the benefits that would arise). It is also relevant to note that the existing planning permission does not cover the whole of the proposed Site allocation (52 hectares of the 66 hectare Site) and therefore any policy (whilst recognising the existing planning permission) should be sufficiently flexible to allow alternative proposals to come forward on the Site or parts of the Site.

As we have previously set out, as drafted, we have concerns over the balance of uses and how they have been arrived at:

- The policy overstates housing numbers (220 dwelling v the 150 that will be delivered).
- It is unclear how the 16 hectares for 'enabling mix uses' has been arrived at. We are not aware of any evidence base or viability analysis to justify the approach and land use split.
- It is unclear whether the provision of the 220 dwellings is in addition to the 16 hectares identified for 'enabling mix uses' or included within it.
- The exclusion from the policy, that 'alternative high value generating uses' are required to ensure the viability of any scheme, where they are clearly demonstrated to be necessary to fund essential infrastructure is a significant omission. This was clearly stated in the adopted South Ribble Local Plan (Policy C4), the adopted Masterplan (2015) and in the grant of the two large scale planning permissions on the Site.
- The lack of flexibility in the Policy has the potential to undermine its effectiveness and has the potential to undermine the future development of the Site.

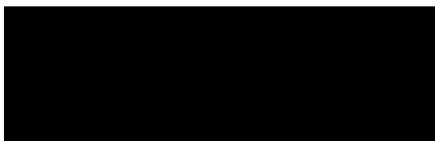
As a result of the above, we do not believe the policy is clear or justified and as a result will not be effective.

The relatively minor amendments we believe are necessary to address those deficiencies and make the policy sound are set out in **Appendix 1** to this letter.

Summary

We would be grateful if the contents of this letter could be drawn to the Inspector's attention and taken into consideration when formulating the detailed policy wording of Policy EC6.

Yours sincerely,



Paul Newton
Director

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NWS Planning Limited

Appendix 1 — Suggested Amended Wording

Deleted text is struck through

New text is show in red

Policy EC6: Mixed Use Allocations South Ribble

1. The following site is allocated and protected for mixed use development.

Ref	Location	Total Site Area (ha)	Site Area for Enabling Mix Uses (ha)	Number of Dwellings	Site Area for Employment (ha)	Employment Use Class
EC6.1	Cuerden	66.00	16.00	220 150	50.00	E(g), B2, B8
		66.00	16.00	220 150	50.00	

2. Key development considerations regarding Cuerden are set out within Appendix 6. Development meeting these considerations will be supported.

3. Alternative uses will be acceptable where they are clearly demonstrated to be necessary to fund essential infrastructure or will help deliver employment uses on the Site.

4. A wintering bird survey is required alongside any planning application in accordance with Policy EN7 to provide certainty that the loss of functionally linked land within the site allocation will not adversely affect the integrity of Special Protection Areas (SPAs) and Ramsar sites.

Appendix 6 — Key Development Considerations

Site Ref	EC6.1
Site Area (Ha)	66
Settlement	Lostock Hall, Farrington East ward.
Amount/type of development (indicative)	<p>Employment led mixed use. Proposed c. 50 hectares of employment land, c. 220 dwellings.</p> <p>Non-employment uses will be acceptable where they are clearly demonstrated to be necessary to fund essential infrastructure or will help deliver employment uses on the Site.</p>
Masterplan	<p>Development of the wider Cuerden site should where possible accord with the adopted Cuerden Masterplan (April 2015) or future versions. The scale of any non-employment development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the delivery and maintenance of the primary employment function of the site. All applications for development, including applications for the approval of reserved matters, should demonstrate that they would not prejudice the delivery of land elsewhere within the Cuerden allocation and where possible enhance the prospects of land elsewhere within the wider site being developed.</p>
Planning Obligations (ID2)	A planning contribution is likely to may be required to help mitigate the impacts of development and in line with policy ID2.
Designated Sites for Nature Conservation (EN7)	To provide certainty that the loss of functionally linked land within the site allocation will not adversely affect the integrity of SPA and Ramsar sites, a wintering bird survey is required alongside any planning application in accordance with Policy EN7.
Flood Risk (EN10)	The level 1 SFRA indicates a limited surface water risk on parts of the site which do not benefit from planning permission. Flood risk should be manageable through careful consideration of site layout and design.
Drainage (EN11)	United Utilities (UU) indicate that the site does not have access to a foul sewer. There is a record of sewer flooding in the vicinity of the site. Early dialogue with UU will be required prior to the submission of a planning application. Attention will be required to drainage within and from the site to ensure that there is no impact on surrounding

	watercourses.
Heritage assets and archaeology (EN13)	There is a Grade II Listed Building within the site, The Old School House. Depending on location of development proposals, a Heritage Assessment should be provided to assess the impact upon its setting. Mitigation may then be necessary. There were archaeological investigations on the site in 2018. Early dialogue is advised with Lancashire County Council Archaeological Unit prior to the submission of a planning application.
Phasing and Infrastructure Delivery Schedule	A Phasing and Infrastructure Delivery Schedule will be required for subsequent any planning applications, to identify how the site's essential infrastructure will be delivered in a comprehensive manner.
Highways (ST1/ ST2)	Early dialogue is recommended with the Highway Authority, prior to the submission of further any planning applications, to ensure appropriate access and local highway network mitigation is provided. Development layout and scheme detailing should provide good connectivity to the established Public Rights of Way network including mitigation of any adverse impacts.
Ecology (EN9)	Potential ecological impacts must be considered as part of any planning application for developing the site due to its largely greenfield nature.