

Development Management Group
Lancashire County Council
PO Box 100
County Hall
Preston
PR1 0LD

10 Throgmorton Avenue
London
EC2N 2DL

townlegal.com

T: 0203 893 0370

D: 020 3893 0384

E: simon.ricketts@townlegal.com

By email (devcon@lancashire.gov.uk)

Our ref BRO004/0001/4123-7828-4867/1/SR
6 December 2022

Dear Sir or Madam

Cuerden Strategic Site, East of Stanifield Lane, North of Clayton Farm, West of Wigan Road, Lostock Hall - Planning Application LCC/2022/0044

We act for the Brookhouse Group Limited.

We have previously written to you on 30 September 2022, raising several procedural concerns in relation to the application and requesting further documents. We received no response. We chased again on 1 November 2022 and in so doing requested further documents. Again we received no further response although Mr Hope did call Mr Ricketts of this firm to be talked through the issue we had raised that part of the application site is not within the applicant's ownership meaning that the wrong ownership certificate has been provided, in breach of Articles 13 and 14 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 – an error which we note has still not been rectified. Copies of these letters form appendices 1 and 2 to this letter.

This letter and its appendices now comprise our client's formal objections to the application, without prejudice to the procedural concerns raised in those letters, to which we await your response. To that end please see:

- Brookhouse's representations on planning matters (appendix 3)
- Mode's technical note on transportation matters, comprising a review of WSP's transport assessment (appendix 4)
- Ecus' ecological technical note (appendix 5)

Yours faithfully



Town Legal LLP

Cc Rob Hope, Lancashire County Council (rob.hope@lancashire.gov.uk)