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

21616/A5/PR/PN
10 January 2023

Dear Rob,

**APPLICATION REFERENCE LCC/2022/0044
LANCASHIRE CENTRAL, A.K.A CUERDEN STRATEGIC SITE, EAST OF STANIFIELD LANE,
NORTH OF CLAYTON FARM, WEST OF WIGAN ROAD, LOSTOCK LANE, LOSTOCK HALL,
LANCASHIRE**

We write on behalf of Maple Grove Developments and Lancashire County Council (“the Applicants”) in respect of the above application, which was submitted in August 2022.

Following submission and as a result of feedback received from officers, statutory consultees, and third parties we write to formally amend the application. Whilst the fundamentals of the application scheme remain unchanged, the amendments seek to provide greater clarity on certain aspects of the proposals and address some inconsistencies between the submitted documentation that have been identified through the consultation process.

We explain these further below.

Further Consultation under Regulation 25 of the TCPA (EIA) Regulations 2017

As the application is subject to Environmental Impact Assessment (EIA), and as some of the amendments relate to minor amendments to the submitted Environmental Statement, the amendments should be treated as being submitted under Regulation 25 of the TCPA (EIA) Regulations 2017 and should therefore be subject to a 30 day consultation period.

However, having reviewed the extent of the amendments made, the Applicant is confident that they would not result in any material change to the impacts or findings identified within the ES which requires further amendments to the Environmental Statement (ES). This position is clarified within the EIA Compliance Letter prepared by Barton Willmore now Stantec dated 15 December 2022.

Overview of scheme amendments

The proposed amendments to the scheme are minor in nature and for the avoidance of doubt no changes have been made to the quantum or type of development proposed.

The scheme amendments can be summarised as:

1. Converting the proposal access onto the A49 Wigan Road from outline to full so that the detailed design can be assessed and agreed. This change also ensures that the scheme aligns with the traffic modelling work set out in the submitted Transport Assessment prepared by WSP.
2. Updating the submitted Highway plans to respond to the comments received from National Highways and the highway authority.
3. Updating the submitted Landscape plans to respond to comments received from the Councils Landscape Officer.
4. Updating the submitted Parameter Plans to confirm that the provision of potential access/egress points from the application site into the remaining areas of land allocated under Policy C4 (outside the applicants ownership) can be delivered.
5. Updating a number of the previously submitted plans to ensure that the proposed movement network, comprising a series of Public Rights of Way and other footpaths and cycleways, are consistent across all drawings.
6. Updating the submitted Design Code to provide greater clarity and certainty over landscaping and design quality.

In addition, and whilst not constituting a change to the submitted application this submission also includes clarification regarding ecological matters and the assessment of Biodiversity Net Gain.

All other changes are intended to offer clarification on the proposed development, in response to comments made over the course of the consultation period. Further information regarding these points are outlined within the remainder of this letter.

A full schedule of updated documents is included at **Appendix 1**, noting where they supersede the previously submitted plans/documents.

Application Site Boundary

The application site boundary remains unchanged to that previously submitted and as shown on the Site Location Plan (21017-FRA-XX-ZZ-DR-A-91-0001_P4).

However, a number of minor inconsistencies have been identified across some of the supporting drawings and diagrams which do not show the full extent of the application. This primarily relates to those plans not including parts of the public highway.

Whilst these plans do not constitute or purport to be the Site Location Plan (detailed above) and are therefore only illustrative and required to sufficiently identify the location of the site, we have nonetheless updated the relevant plans so that they accord with the submitted Site Location Plan. The updated drawings are identified below and include:

- ES Vol 1 Figure 1.1;
- ES Vol 1 Figure 2.1;
- ES Vol 1 Figure 3.1a;
- ES Vol 1 Figure 3.1b;

- ES Non-Technical Summary B;
- ES Non-Technical Summary C; and
- ES Non-Technical Summary D.

On the basis that the application documents already assess the implications of the works proposed to the public highway, these changes have no material effect.

Application Form and Site Ownership Certificates

It has also been drawn to our attention that in completing the application form with the original application the incorrect ownership certificate was completed (Certificate A). As some land within the red line of the application is not owned by the Applicant we have updated the application form and have now served Certificate C. We have duly notified those owners that we are aware of but also placed a Notice in the Lancashire Evening Post newspaper on 15 December 2022.

Format of the Application

Whilst we have made every effort to clearly illustrate the extent of outline and detailed elements of the proposed development and explain the format of the application (within the submitted Planning Statement) we note that some consultees have sought further clarification on this point.

We have therefore produced a separate 'Guide to Documents for Approval' note that forms part of this submission. We would request that the Council provide all consultees with a copy of this document when seeking further comments (as part of the re-consultation process). We would of course be happy to speak with them directly should they require further guidance.

Application Amendments

Wigan Road Access/Egress

The application, as originally submitted, proposed four points of vehicular access, one of which was submitted in detail/full (the access into the site from the M65 terminus roundabout) and three which were submitted in outline form. The access points are shown on Parameter Plan 2.

Following discussions with LCC Highways, the application has been amended to provide full details of the Wigan Road access/egress, at the eastern edge of the Site and the Stanifield Lane access/egress into Zone D. The detailed access arrangements are shown on drawings 84465-WSP-XX-DR-012 Revision A and 84465-WSP-XX-DR-010 Revision A.

Therefore, three of the four vehicular access points are now shown in detail (M65, Wigan Road, and the southern access on Stanifield Lane) and full planning permission is sought in respect of these junctions. The design of the remaining access, at the northern end of Stanifield Road (into Zone E), remains in outline form and further details will be submitted for approval at reserved matters stage.

It is also worth noting here that the Parameter Plan 2 also shown indicative internal access points from zone to zone, and to the neighbouring development plots which form part of the wider Policy C4 allocation.

The access and movement strategy shown on Parameter Plan 2 ensures that all areas of allocated land can be accessed, including that which is located outside of the red line boundary of the application site.

Alignment of the pedestrian, cycle, and public right of way network

As raised during our meeting (10 October 2022) a number of discrepancies have been noted in relation to the movement network across the various drawings (i.e. differences in parameter plans, highway

plans and landscaping plans). Such discrepancies have been addressed in this submission so that all plans are now consistent and aligned.

The movement network is shown most clearly on Parameter Plan 2, and the precise location of these routes are now highlighted and colour-coded on the highway plans. We trust that this change provides sufficient clarification on this point and sufficient assurances that linkages will be provided across the Application Site and through to other areas of allocated land.

Response to LCC Planning Comments

This section aims to respond to the various queries you have raised in relation to the submitted documents. We hope that this additional information is useful in addressing any questions you may have, and we would be happy to discuss this with you further.

Clarification regarding residential development parameters.

We are seeking outline planning permission for up to 116 new residential dwellings within Development Zone E. This is set out on Parameter Plan 1. The illustrative masterplan provides some indication as to how this may be laid out, but this layout has been created to inform other aspects of the planning assessment (eg capacity analysis, and the likely financial viability of the project) and is not intended for assessment or approval at this time.

We are therefore seeking approval at this time for the principle of up to 116 dwellings, with the detailed design, layout and exact capacity to be confirmed at the reserved matters stage. This will necessarily include a demonstration that the detail layout conforms with the relevant development management policies including the residential design standards and Policy G10 of the SRBC Local Plan (Green Infrastructure Provision in Residential Developments).

The illustrative masterplan has been designed to achieve broad compliance with the relevant residential design standards and policies, however such detailed assessment is not appropriate at this stage.

It is likely that, once outline permission has been secured, Development Zone E will be disposed of to a developer who specialises in residential construction projects. Such developers are likely to have their own vision for the Site and may propose an entirely different layout. The layout shown on the illustrative masterplan is therefore illustrative and show one, but clearly not the only way the site could come forward.

Detailed assessment against Policy G10 (and other relevant policies) would be dependent upon the final scheme and so it is a point which should be assessed at the reserved matters stage.

We do not believe this approach prejudices the Council's ability to maintain control over the development, or to secure this infrastructure in the future as it would come forward through the reserved matters applications.

If LCC needed further assurances it could be referred to within the conditions as a specific submission requirement, potentially worded in a similar way to Condition 47 of the 2017 permission.

Clarification regarding Acoustic Constraints

Your email (14 October 2022) highlights a discrepancy in Section 6 of the Site Suitability Report. There is an erroneous reference to 'Westbury Park and Westbury Road' which has now been corrected. Your email also queries the third recommendation of the report, which would require the erection of an acoustic screen around Development Zone E to ensure that acceptable levels of ambient noise are provided within the amenity spaces of any dwellings built on site. The report has been reviewed and

amended to provide further clarification on this point, confirming that a 2.5 to 3.0 metre close boarded timber fence should be erected along the northern and western boundaries of the development plot to provide a suitable degree of mitigation. Such an approach is not unusual.

The precise location and detailed design of such a screen is not known at this stage and will largely be dictated by the detailed design and layout of this part of the site. The exact detail of any acoustic fence will therefore be provided at the reserved matters stage albeit the submitted Site Suitability Report demonstrate that suitable noise mitigation measures can be provided as part of any reserved matters scheme to ensure any noise concerns can be appropriately addressed.

Clarification regarding Arboricultural Impacts

We recognise that there are a large number of trees and hedgerows on site and have developed the Parameter Plans to follow the broad layout of the existing agricultural fields to minimise the impact to these features. We note from our meeting on 10 October 2022 that you would like further information regarding the potential arboricultural impacts of the scheme.

As the application is submitted in outline form, and the precise layout of each development zone is reserved for future consideration, the exact extent of any impact is not known at this stage but will be assessed as part of the reserved matters applications.

We recognise, however, that the detailed designs of the vehicular access points and the network of strategic green infrastructure is known and is submitted for approval, and therefore the level of impact upon trees and hedgerows for these elements can be assessed. The design is based upon an Arboricultural Survey which is included with this submission and an Arboricultural Impact Assessment (AIA) has been undertaken in relation to these aspects of the application. This report demonstrates that the retention of existing trees and hedgerows have been prioritised and, whilst some removal is necessary to facilitate access to the site, replacement planting is proposed to ensure compliance with Policy G13 of the SRBC Local Plan (Trees, Woodland and Development) and mitigate against loss.

Again, suitably worded planning conditions can be used to ensure that this remains a key consideration for the outline elements of the application, when detailed designs are assessed at reserved matters stage.

Detailed response to comments made by LCC Ecology (via Jacobs)

We note the consultation response prepared by Jacobs on behalf of LCC's Ecology Department (14 November 2022), which requests further clarification regarding the assessment methodology. A detailed response to these comments has been prepared by our ecologists, Envirotech and provides sufficient assurances that the ecological impacts of the detailed phases of the development, and the potential ecological impacts of the outline elements of the proposed development, have been sufficiently assessed.

Detailed response to comments made by Wildlife Trust

We are pleased to see that Wildlife Trust (WT) raises no objection to the proposed development, however we note that the Trust has questions regarding the long-term monitoring and enforcement of the Biodiversity Net Gain (BNG) credits. In order to clarify matters Envirotech has confirmed that the developer(s) will be responsible for the administration and assignment of BNG Credits, and that such details will eventually be handed over to a management company who will oversee the long-term management, funding, and upkeep of habitat areas via a service charge. It is envisaged that monitoring will be undertaken in Years 1, 2, 3, 5, and 10, and then carried out every 5 years thereafter. Habitat areas will be assessed against the pre-development target condition scores. Reports on habitat condition and actions required to achieve target condition will be provided to the Local Authority

Detailed response to comments made by LCC Landscaping

Over the course of preparing this pack of revised information, we note that a detailed set of comments has been issued by LCC's Landscaping Officers.

It should be noted that the landscaping comments is the scope of the assessment. Whilst this level of detail is welcome and will prove to be useful over the course of this project, it comments on both the strategic green infrastructure shown within the parameter plans (the detailed element of the proposal), and the designs shown in the illustrative masterplan (including areas of land which in which detailed designs are to be reserved for future consideration). Not all of the comments made are relevant to the details submitted for approval at this time.

In the interests of timing, and to ensure that progress is made with respect to other assessments, we have chosen to proceed with this submission. We believe this pack goes some way to addressing the officer's comments but will continue to work on a more detailed response, most notably in respect of the Landscape and Visual Impact Assessment (LVIA).

Response to comments made by members of the public

To date we understand that there has been a limited response from members of the public. We understand that there have been a small number of queries regarding potential highway impacts, which is a matter being assessed by both LCC Highways and National Highways.

We note from your email dated 3 October 2022 that there have been some questions regarding (1) the Financial Viability Assessment, (2) the Transport Assessment, and (3) the degree of consistency between some of the plans and diagrams submitted. We have set out our response to each of these issues below.

Financial Viability Assessment

You have passed on a query regarding the infrastructure costs quoted within the submitted Financial Viability Assessment prepared by CBRE.

Paragraphs 4.22-4.24 of the Financial Viability Assessment sets out the total cost of the strategic infrastructure which we are anticipating as part of this process. Paragraph 4.24 confirms that the total anticipated cost amounts to circa ~£59m, comprising ~£41m of works off-site and ~£18m on-site. The text goes onto explain what other assumptions have been made regarding these costs.

Whilst we understand that a member of the public has asked to see a detailed breakdown of these costs, we believe our Financial Viability Assessment presents an appropriate level of detail to reach an informed conclusion on the viability of the scheme. We do not therefore consider it necessary to provide further detail.

Transport Assessment

You have passed on a request that we provide copies of the pre-application discussions with LCC Highways.

Paragraphs 1.4.1-1.4.1 of the submitted Transport Assessment provides an overview of the pre-application discussions which took place between the Applicant, LCC Highways and National Highways. We do not consider it necessary or relevant to provide details of these discussions as any comments received at that stage would have been based on a draft and indicative scheme. As a consequence it would only serve to confuse matters.

Instead, we would refer the consultee to the comments recently provided by National Highways on the application, as these relate directly to the proposed development and are available to view online.

We understand that LCC Highways is also formulating its view on the application and will be commenting shortly and that any comments will also be available to view online once finalised.

Response to comments made by South Ribble Borough Council

We note that South Ribble Borough Council has recently provided its formal comments on the application (dated 18 November 2022). The Applicant intends to carry out further discussions with SRBC and LCC (as LPA) before providing a response to these comments. Any clarifications or amendments will be made through a separate submission of additional information.

Summary and Conclusions

We trust that the above information is useful and addresses the comments which have been raised to date. Should you have any further questions, please do not hesitate to contact me or my colleague Paul Newton.

Yours sincerely,



PAUL REEVES

Planning Associate

Enc.

APPENDIX 1: SUBMISSION SCHEDULE

Submission of further information

In responding to the comments, we have prepared the following documents and drawings:

* (E) Existing, as submitted (S) Substitute existing details (N) New document not previously submitted

Topic	Type	Reference	Title
Acoustics	S	WIE11556-109-R-1.3.2	Residential Site Suitability Report
Arboriculture	N	SF3236 AIA Revision C	Arboricultural Survey Report including Impact Assessment
Arboriculture	N	SF3236 AIA01-AIA01	Phase A Green Infrastructure
Arboriculture	N	SF3236 AIA01-AIA02	Phase A Green Corridor
Arboriculture	N	SF3236 AIA01-AIA03	Wigan Road Junction
Arboriculture	N	SF3236 AIA01-AIA04	Stanifield Lane Junction
Arboriculture	N	SF3236 AIA01-AIA05	Zone D East
Ecology	N	Letter dated 07/11/22	Letter in response to LCC Ecology and Wildlife Trust
Ecology	S	Revision R5	Biodiversity Net Gain Lancashire Central Ref R5
Ecology	E	Revision R6	Biodiversity Metric 3.1 Lancashire Central Full Site 2017
Highways	N	84465-WSP-XX-DR-001 Revision A	Wigan Road Access Junction (Illustrative Only)
Highways	N	84465-WSP-XX-DR-002 Revision A	Stanifield Lane Access Junction to Phase D (Illustrative Only)
Highways	N	84465-WSP-XX-DR-003 Revision A	Stanifield Lane Access Junction to Residential Phase (Illustrative Only)
Highways	S	84465-WSP-XX-DR-004 Revision A	M65 Terminus Roundabout
Highways	N	84465-WSP-XX-DR-005 Revision B	Highways Layout Sheet 1 of 3 (Illustrative Only)
Highways	N	84465-WSP-XX-DR-005 Revision B	Highways Layout Sheet 1 of 3 (Illustrative Only) (No Tracking)
Highways	N	84465-WSP-XX-DR-006 Revision B	Highways Layout Sheet 2 of 3 (Illustrative Only)
Highways	N	84465-WSP-XX-DR-007 Revision B	Highways Layout Sheet 3 of 3 (Illustrative Only) (No Tracking)
Highways	S	84465-WSP-XX-DR-010 Revision A	Stanifield Lane Access Junction To Phase D (Extent of Detailed Application)
Highways	S	84465-WSP-XX-DR-011 Revision B	Highways Layout (Extent of Detailed Application)
Highways	S	84465-WSP-XX-DR-011 Revision B	Highways Layout (Extent of Detailed Application) (No Tracking)
Highways	S	84465-WSP-XX-DR-012 Revision A	Wigan Road Access Junction (Extent of Detailed Application)
Landscaping	S	SF3236 LL01 Revision B	Landscape Proposals – Green Infrastructure
Landscaping	S	SF3226 LL02 Revision B	Stanifield Lane Access Junction to Phase D
Landscaping	S	SF3226 LL03 Revision B	Wigan Road Access Junction
Landscaping	N	SF3236 LL04 Revision A	Landscape Proposals – Green Infrastructure Zone A
Landscaping	N	SF3236 LL05 Revision A	Landscape Proposals – Green Infrastructure Zone B
Landscaping	N	SF3236 LL06 Revision A	Landscape Proposals – Green Infrastructure Zone C
Landscaping	N	SF3236 LL07 Revision A	Landscape Proposals – Green Infrastructure Zone D
Parameters	S	Rev P6	Design and Access Statement
Parameters	S	Rev P7	Design Code
Parameters	N	21017-FRA-XX-XX-DR-A-9124-P2	Public Rights of Ways – Sheet 1 of 2
Parameters	N	21017-FRA-XX-XX-DR-A-9125-P2	Public Rights of Ways – Sheet 2 of 2

Topic	Type	Reference	Title
Parameters	S	21017-FRA-XX-XX-DR-A-91-1000-P12	Illustrative Development Framework Plan
Parameters	S	21017-FRA-XX-XX-DR-A-9111-P11	Parameters Plan 1
Parameters	S	21017-FRA-XX-XX-DR-A-9112-P14	Parameters Plan 2
Parameters	S	21017-FRA-XX-XX-DR-A-9113-P12	Parameters Plan 3
Planning	N	21616	Guide to Documents for Approval
Planning	S	21616	ES Non-Technical Summary B
Planning	S	21616	ES Non-Technical Summary C
Planning	S	21616	ES Non-Technical Summary D
Planning	S	21616	ES Vol 1 Figure 2.1
Planning	S	21616	ES Vol 1 Figure 3.1a
Planning	S	21616	ES Vol 1 Figure 3.1b
Planning	N	21616	ES Compliance Note

APPENDIX 1: ENVIRONMENTAL STATEMENT COMPLIANCE NOTE

Mr R Hope
Development Management Group
Lancashire County Council
PO Box 100
County Hall
Preston, PR1 0LD

Our Reference: 21616/A5/AD
22 December 2022

Dear Mr. Hope,

RE: LANCASHIRE CENTRAL (Ref: LCC/2022/0044) – EIA COMPLIANCE LETTER

We write on behalf of Lancashire County Council (LCC) and Maple Grove Developments (the 'Applicants') in respect of the Lancashire Central Site in Cuerden. The purpose of this letter is set out our response to the consultation comments received so far in relation to the Environmental Statement (ES).

Background

An outline planning application, with all matters reserved, for employment led development with commercial and residential uses was submitted to LCC in August 2022 (validated 19th August 2022). The formal description of development states:

'Application for Outline Planning Permission (with all matters reserved save for access from the public highway and strategic green infrastructure/landscaping) for a mixed-use development including the provision of Employment use (Use Classes B2/B8/E(g)); retail (use Class E(a)); food, drink and drive-through restaurant use (Use Class E(b))/Sui Generis Drive-Through); hotel use (Use Class C1); health, fitness and leisure use (Use Classes E(d)/F(e)/F2(b)); creche/nursery (Class E(f)); car showrooms (Use Class Sui Generis Car Showroom); Residential use (C3) the provision of associated car parking, access, public open space, landscaping and drainage, and the realignment of Public Right of Way Ref 9-12 FP12, 9-12 FP6/FP7/FP8, 9-12 FP9 and 9-12-BW11'

The proposed development falls within category 10 of Schedule 2, 'Infrastructure Projects', sub-section (b) 'Urban Development Projects' of the *Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017*, as amended (the 'EIA Regulations'). At 60.92ha where the proposed development exceeds the 5-hectare threshold and therefore falls within the Scope of the EIA Regulations.

The proposed development was considered to have the potential to give rise to likely significant effects on the environment by virtue of its scale and an ES was prepared to accompany the planning application. In agreement with LCC, the following topics were scoped in the ES:

- Socio-Economics;
- Landscape and Views;
- Built Heritage;
- Transport and Access;

- Noise and Vibration;
- Air Quality; and
- Ecology

Scheme Amendments

Following the submission of the application and as a result of consultation feedback a number of amendments have been made to the application. These are minor in nature and do not alter the uses, scale, or quantum of development proposed.

These amendments which include updated Parameter Plans and Design Code have been submitted under separate cover.

In addition, a number of minor discrepancies within the ES drawings have been identified, namely not all drawings included the full extent of the submitted red line site boundary as shown on Plan 21017-FRA-XX-ZZ-DR-A-91-0001_P4. As such, the ES has updated the drawings and documents that show the red line boundary of the site in full for consistency purposes.

The ES documents and drawings that will be updated within the ES are as follows:

- ES Vol 1 Figure 2.1;
- ES Vol 1 Figure 3.1a;
- ES Vol 1 Figure 3.1b;
- ES Non-Technical Summary B;
- ES Non-Technical Summary C; and
- ES Non-Technical Summary D.

Conclusion

The ES and assessment of likely significant effects have been considered in relation to the minor amendments to the updated Parameter Plans and Design Code. Due to the limited nature of the changes, it is considered that there would be no change to the predicted likely significant effects reported in the 2022 ES. No new or amended significant effects would arise as a result of the amendments and the conclusions of the ES therefore remain valid.

Yours sincerely,

M. Mescall

MARY MESCALL

Environmental Planning Associate Director