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Our ref BRO004/0001/4147-5360-3653/2/SR
23 February 2023

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 objected to the above application on behalf of Brookhouse Group Limited.

Our client and its advisers have reviewed the additional documentation submitted by the applicant dated 10 January 2023. Significant concerns remain both as to the proposals and as to the adequacy of the information provided, which does not form any proper basis for positive determination.

This letter and its appendices comprise our client's updated objections to the application, without prejudice to the procedural concern that we have previously raised as to use of Regulation 3:

- Alyn Nicolls' observations on amendments to the application, 20 February 2023
- Mode's transport assessment review no.2, 21 February 2023
- Ecus' ecological technical note, 21 February 2023
- Ecus' review of arboricultural reports, February 2023

Our client has sought to meet with the applicant to work through outstanding matters (see attached copy email dated 10 February 2023) to which it has had no response. Whilst there are various outstanding issues, it is concerning that despite some of the updated drawings implying the potential for connection to the areas within the allocation which are not part of the application, namely those areas owned by our client, there is still no commitment whatsoever in the documentation that our client will not be ransomed when it brings forward the remaining elements of the allocation.

Given the council's role as a public authority, particularly with its planning and transportation responsibilities, it is disappointing that the approach it is taking as applicant appears to be far from exemplary, both in terms of constructive engagement and in terms of the application documentation still plainly lacking much information which would be necessary before a decision can be taken.

Partners: Elizabeth Christie, Mary Cook, Duncan Field, Clare Fielding, Michael Gallimore,
Raj Gupta, Meeta Kaur, Simon Ricketts, Patrick Robinson, Louise Samuel, Spencer Tewis-Allen

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We would request that this letter, together with our 6 December 2022 letter (and the annexures to both letters) be placed on the planning portal together with any other third party representations that may have been received.

Finally, we understand that further application documents were uploaded onto the planning portal yesterday. These have not yet been reviewed in detail but do not on first reading address the issues raised in this letter and its attachments.

Yours faithfully

A handwritten signature in grey ink that reads "Town Legal LLP". The signature is written in a cursive, slightly slanted style.

Town Legal LLP

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