

01 November 2023

Project/File: 33313558300/A3/PR/PN

**Mr R Hope**

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

Dear Rob,

**Reference: LCC/2022/0044**

**Lancashire Central, East of Stanifield Lane, North of Clayton Farm, West of Wigan Road, Lostock Lane, Lostock Hall, Lancashire**

We write in relation to the above application on behalf of Maple Grove Developments and Lancashire County Council ("the Applicants"). As you are aware over the course of the application Brookhouse Group Limited ("BGL") has submitted a number of comments.

We have previously responded to their comments submitted in September, November and December 2022 via our letter dated 24 February 2023.

BGL has subsequently submitted two further 'sets' of comments. These were uploaded to the planning application webpage as follows:

- Submission uploaded 4 April 2023, comprising:
  - Letter dated 31 March 2023 – Town Legal;
  - Letter dated 19 March 2023 – Alyn Nicholls Planning;
  - Letter dated 27 March 2023 – JLL;
  - Site Capacity Assessment dated March 2023 – SMR Architects;
  - Letter dated 28 March 2023 – Ecus Ecology; and
  - Tabulated Response, undated, Mode Transport Planning.
- Submission uploaded 29 September 2023, comprising:
  - Letter dated 26 September 2023 – Town Legal;
  - Technical Note dated 19 September 2023 – Mode Transport Planning; and
  - Masterplan and Design Code Audit, dated 7 August 2023 – Pegasus Group.

**Reference: Lancashire Central**

As BGL's comments take the form of several letters and reports, we have prepared the enclosed Response Tables dated 1 November 2023, setting out our response to all of the points raised. The response contains input from the Applicants transport consultant WSP, and their ecologist Envirotech.

In summary, having reviewed BGL's comments we do not believe any amendment to the submitted application material is required.

The proposed development has been robustly justified and is compliant with all relevant aspects of the Development Plan and National Planning Policy.

We trust that this clarifies our position in respect of the comments made. However, should you require any further information or clarification, please do not hesitate to contact me or Paul Newton.

Yours sincerely,

**STANTEC UK LIMITED**



**Paul Reeves** MPLAN MRTPI  
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**Appendix 1**  
**Planning Response from Stantec**

**LANCASHIRE CENTRAL  
RESPONSE TO REPRESENTATIONS MADE BY BROOKHOUSE GROUP LIMITED**

**BGL Submission, uploaded 4 April 2023**

<i>Letter dated 31 March 2023 – Town Legal</i>	
<b>Issue Raised by BGL</b>	<b>Applicant Response</b>
1. The scheme does not provide comprehensive development of Site as required by Policy C4.	<p>The scheme allows for the comprehensive redevelopment of the land allocated under Policy C4. The application is consistent with the definition of ‘comprehensive development’ as set out in the glossary of the Local Plan. This recognises that individual parcels of land within a larger site may be delivered at varying times, but that all development should take place in line with a wider strategic framework. In this instance, that framework is set out within the 2015 Masterplan, which has been adopted by SRBC for development management purposes.</p> <p>BGL assert that the proposed development fails to ensure that the CSS as a whole, including BGL-owned land, can be delivered ‘without delay’. The Applicant disagrees with this statement. Whilst the core objective of the Masterplan is to achieve the comprehensive development of the entire site, the Masterplan was ‘land ownership blind’. Changes in the circumstances of the Site prevented the previous permission, which incorporated all allocated land, from being implemented. That permission has now expired.</p> <p>The current application seeks to bring forward the majority of the allocated Site, the important infrastructure to open the site up to development, and importantly makes appropriate allowances for the remaining parts of the CSS to be accessed and developed, by indicating the locations of future access points through to BGL-owned land.</p> <p>Clearly, it is for BGL to bring forward their own planning application(s) for the development of their land and the current application proposals do not prejudice BGL’s ability to deliver development across their site(s) to complete the development of the wider allocated site.</p>
2. Piecemeal approach to development of the CSS is wasteful in terms of land-use.	BGL have asserted that the application does not make best use of the site contrary to planning policy imperatives including the aims of the NPPF. The objection relies upon a Site Capacity Assessment prepared by SMR Architects.

<i>Letter dated 31 March 2023 – Town Legal</i>	
Issue Raised by BGL	Applicant Response
	<p>Whilst the NPPF does encourage the efficient and optimum use of land, it also states that proposals should accommodate and sustain an appropriate amount and mix of development (Paragraph 130). There is no formal definition of ‘appropriate’ development within the context of this statement, suggesting that the NPPF’s presumption in favour of sustainable development (Paragraph 11) should be applied. This suggests that proposals that accord with an up-to-date development plan should be approved without delay or, where policies are out-of-date or absent, granting permission unless there are any material considerations which suggests that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p> <p>In this instance, the development of the CSS is led by Policy C4 and the approved 2015 Masterplan. Neither document prescribes the precise amount or format of the employment land which is to be provided. On this basis it can be assumed that the presumption in favour of sustainable development should be applied.</p> <p>Whilst it is noted that BGL has provided a Site Capacity Assessment to support their claims (detailed comments set out separately below), the Applicant does not consider such evidence to suggest that the proposed development falls below the policy aspirations of SRBC or LCC (as LPA to this application). An appropriate scale of development has been proposed and the application should be determined accordingly on this basis.</p>
3.	<p>The viability case for enabling use is not sufficiently clear.</p> <p>BGL’s comments on the Financial Viability Assessment are noted.</p> <p>However, the Council has separately instructed Roger Hannah to independently review the submitted Financial Viability Statement. The Viability Review (dated 5 July 2023) prepared by Roger Hannah confirms that the ‘non-employment’ use proposed is the minimum amount necessary to fund essential infrastructure and which will not prejudice the delivery and maintenance of the primary employment function of the site in line with Policy C4.</p>
4.	<p>There are ‘significant flaws’ in the technical assessments submitted, with specific reference to the Transport Assessment.</p> <p>The Applicant disagrees with this statement. The Applicant is satisfied that the scope and nature of assessments presented in support of the application are appropriate and robust.</p> <p>As you would expect of an application of this scale there have been ongoing discussions with Lancashire County Council as highway authority and National Highways throughout the application process where the robustness of the submitted information has been challenged and tested.</p>

<i>Letter dated 31 March 2023 – Town Legal</i>		
	<b>Issue Raised by BGL</b>	<b>Applicant Response</b>
		<p>Whilst the highway authority's response is awaited, it should be noted that National Highways raise no objection to the application (subject to conditions).</p> <p>With regard to the detailed points BGL's raise in relation to the Transport Assessment this is addressed by the Applicants transport consultants WSP (see section below regarding BGL's highways comments, prepared by Mode Transport Planning).</p>
5.	The piecemeal approach to development does not provide any assurances regarding linkages through to the remaining parts of the CSS.	<p>The proposed development currently allows for seven points of access through to BGL-land, six of which would accommodate vehicular access. These access points are shown on Parameter Plan 2.</p> <p>It is anticipated that the precise location and design of these access points will be agreed as and when the detailed layout and design for each Development Zone is submitted for approval.</p>
6.	Any potential for ransomed land should be avoided through the use of a S106 Legal Agreement.	<p>BGL has requested that a 'no ransom' clause is imposed by way of a Section 106 Legal Agreement and have provided examples as to how such clauses could be worded.</p> <p>An obligation as suggested should only be required when it meets the tests set out in Paragraph 57 of the NPPF, in that it must be necessary to make the development acceptable in planning terms, be directly related to the development, and fairly and reasonably related in scale and kind to the development.</p> <p>We do not consider such an obligation would meet the Paragraph 57 tests as it is not necessary to make the development acceptable. The current planning application clearly shows how the BGL can be accessed through the application site (see Parameter Plan 2) and there is nothing to suggest that the comprehensive development of the wider site is likely to be prejudiced if BGL has to enter into negotiations' with MGD/LCC to agree a way forward that fairly reflects the current landownership position.</p> <p>In any event and notwithstanding the above position BGL is currently pursuing its own planning applications for access points into two of its three development plots. In such a scenario it cannot be reasonable or necessary to impose an obligation on the current application, in circumstances where BGL is promoting its own land on the basis that it can be accessed satisfactorily other than via the current application site.</p>
7.	A condition should be imposed upon any permission granted to ensure that unfettered access is provided to the remaining development phases.	BGL's comments are noted. However, our position, as set out above is that such a condition/obligation is not necessary.

<i>Letter dated 31 March 2023 – Town Legal</i>	
Issue Raised by BGL	Applicant Response

<i>Letter dated 19 March 2023 – Alyn Nicholls Planning</i>	
Issue Raised by BGL	Applicant Response
8.	<p>The proposals are not consistent with the 2015 Masterplan as they do not include proposals for the BGL-owned land.</p> <p>The Applicant disagrees with this statement as set out above.</p>
9.	<p>The proposals must provide on-site infrastructure capable of delivering the CSS as a whole.</p> <p>The planning application provides all of the infrastructure necessary to open up the Site for development and is sufficiently scaled to accommodate the development requirements of the CSS.</p> <p>However, it is not possible to provide development on third party land. The application therefore demonstrates how the additional land parcels can be accessed/served. The detailed layout will need to be brought forward by the respective owners.</p>
10.	<p>Planning conditions and obligations must require the delivery of access to BGL-owned land in the initial phases of development.</p> <p>This point has been raised by BGL's solicitors, Town Legal, and has been covered in detail above.</p>
11.	<p>Failure to accommodate large-scale employment units within the CSS would represent a 'missed opportunity'. Capacity Assessments suggest that the Development Zone D, in combination with the BGL-owned land to the south, is capable of accommodating additional development.</p> <p>The Applicant notes BGL's comments in this regard, which are supported by a standalone 'Site Capacity Assessment' document presented by BGL. The Applicant has reviewed this document and has provided a direct response elsewhere within this submission. In summary, BGL has placed too great an emphasis upon the illustrative masterplan and has not had sufficient regard to the outline nature of the proposals and the extent of land that will be made available for development. It is clear that the individual Development Zones have the ability to provide large scale units, should demand exist.</p>
12.	<p>The Viability Assessment does not provide sufficient information to conclude that the alternative uses are necessary at the scale proposed.</p> <p>The LPA has separately instructed Roger Hannah to review the submitted Financial Viability Statement. The Viability Review (dated 5 July 2023) prepared by Roger Hannah confirms that the 'non-employment' use proposed is the minimum amount necessary to fund essential infrastructure and which will not prejudice the delivery and maintenance of the primary employment function of the site in line with Policy C4.</p>

<i>Letter dated 19 March 2023 – Alyn Nicholls Planning</i>		
Issue Raised by BGL		Applicant Response
13.	No independent external examination of the submitted Financial Viability Statement has been provided.	As above, this is incorrect.

<i>Letter dated 27 March 2023 – JLL</i>		
Issue Raised by BGL		Applicant Response
14.	The development of the CSS should make allowances for 'big box' developments of 100,000sqft or more.	<p>The policies of the Development Plan, including site-specific Policy C4, do not prescribe the scale of development that should be delivered in this location. Paragraph 6.31 of the Local Plan explains that the key focus will be to bring forward new employment investment and opportunities to the local area and wider sub-region. Any applications made in respect of the site must be determined on its own merits.</p> <p>In the absence of any planning policies which dictate the precise scale of development, the Applicant considers that the Proposed Development would deliver a balanced mix of employment uses across a range of unit sizes based on current market demand.</p> <p>Notwithstanding the above, the planning application does allow for 'big box' developments of 100,000 sq. ft. (approx. 9,300sqm) or more. Such development would sit comfortably within the maximum scale parameters set out within Parameter Plan 1, thereby demonstrating that this scale of development could be accommodated on Development Zones A, B, C, and D subject to detailed layout and design considerations.</p>
15.	Uncertainty regarding timing and deliverability has adversely affected interest from potential occupiers.	The uncertainty regarding deliverability which JLL has referred to stems from the 2017 permission, the withdrawal of the key retail tenant, and the subsequent challenges faced in implementing the 2017 permission. This latest application has been prepared in response to those challenges, and to seek permission for a scheme which is deemed to be deliverable within the timescales set out in the submitted phasing plan.
16.	The CSS should be developed as a single proposal to accommodate developments of larger footprints, to reduce the cost of infrastructure, and to reduce duplication in consultant costs.	<p>Due to the current landownership position this is not possible.</p> <p>It is also not necessary (as set out above).</p>



<i>Site Capacity Assessment, dated March 2023 – SMR Architects</i>	
Issue Raised by BGL	Applicant Response
17. Provides six layout examples, indented to support arguments that the piecemeal development of the CSS does not achieve the optimum use of the land.	<p>BGL's objections rely upon a Site Capacity Assessment as a means of demonstrating that the current proposals would result in the piecemeal development of the CSS, and that a greater quantum of floorspace could be achieved if both LCC and BGL-owned land were developed as one.</p> <p>This is a purely theoretical exercise.</p> <p>Nevertheless, the Applicant has reviewed the Site Capacity Assessment prepared on behalf of BGL. The key observations are set out below:</p> <ul style="list-style-type: none"> <li>• The starting point for the assessment is flawed, as it bases its comparisons on the illustrative masterplan, for which planning permission is not being sought. The illustrative masterplan shows a hypothetical scheme of 28,724sqm for Development Zone D, and not the maximum development parameter of 47,000sqm which is in fact being applied for as part of the application. This increases Option 1 to 78,000sqm and better reflects the parameters proposed.</li> <li>• The assessment fails to recognise the potential contributions made by other Development Zones within the proposed development, specifically Zone B which aims to accommodate the largest employment units and seeks a maximum development parameter of 65,000 sqm within the plot.</li> <li>• The assessment proposes a series of arbitrary layouts which have no regard to the key placemaking principles established within the 2015 Masterplan, including the access and movement network and the Strategic Green Infrastructure. Option 2, which accommodates the 'big box' development, would significantly undermine this strategy.</li> <li>• The assessment fails to outline the nature of development that could take place on BGL-owned land when based around the current application. It fails to identify any particular issue or obstruction to development.</li> </ul>

<i>Letter dated 28 March 2023 – Ecus Ecology</i>	
Issue Raised by BGL	Applicant Response
18. Various technical matters.	A separate tabulated response has been prepared in relation to the latest comments from BGL's ecology consultant, Ecus. Please refer to <b>Appendix 2</b> .

<i>Letter dated 28 March 2023 – Ecus Ecology</i>	
Issue Raised by BGL	Applicant Response
	In summary, the Applicant considers that sufficient information has been provided to enable a full assessment of the Proposed Development, and that further information is likely to be secured by way of suitably worded planning conditions.

<i>Tabulated Response, undated – Mode Transport Planning</i>	
Issue Raised by BGL	Applicant Response
19. Various technical matters.	A further tabulated response has been prepared in relation to the latest comments from BGL's highway consultant, Mode Transport Planning. Please refer to <b>Appendix 3</b> .  No significant omissions have been identified through this review.

### **BGL Submission, uploaded 29 September 2023**

<i>Letter dated 26 September 2023 – Town Legal</i>	
Issue Raised by BGL	Applicant Response
20. Requests that the Design Code approved in 2017 as part of the now expired permission reference 07/2017/0211/ORM be uploaded to the Council's website.	The 2017 Design Code is not relevant to this application. That Design Code was prepared and submitted in support of a previous application which proposed a very different type and form of development.
21. Questions whether LCC has the ability to adopt a revised Design Code and whether it should be referred to SRBC for adoption.	As the relevant authority LCC has the ability to approve the submitted Design Code (in line with the expectations set out in Policy C4 of the adopted Local Plan).  SRBC has been formally consulted on the current application and has not raised this as an issue.
22. Requests a copy of any instructions provided to Viability Consultants Roger Hannah Associates by LCC Planning. Disagrees with the methodology and assumptions made by both CRBE and Roger Hannah.	The Applicant is aware that BGL does not agree with the findings of the Council's independent review of the Applicant's viability evidence. The Applicant understands that LCC Planning has responded to BGL's requests for information.
23. Requests for anti-ransom provisions concerning access to BGL-owned land.	This is a repeat of previous comments that has been addressed above at Item (6).

<i>Masterplan and Design Code Audit, dated 7 August 2023 – Pegasus Group</i>		
	<b>Issue Raised by BGL</b>	<b>Applicant Response</b>
24.	Asserts that Chapter C of the 2015 SRBC Local Plan sets out the need for a comprehensive masterplan to be agreed by all landowners and developers in advance of any planning application(s).	<p>A comprehensive strategy for the CSS has been agreed, in the form of the 2015 Masterplan. This document was agreed by all landowners and approved by SRBC for development management purposes and meets the definition of 'Comprehensive Masterplan' as defined by Appendix 8 of the Local Plan.</p> <p>The definition of 'Comprehensive Development' confirms that individual parcels of land may be developed at different times.</p>
25.	Asserts that a Design Code has already been adopted for the CSS in 2017, that it is unclear why a new Design Code is needed, and what status it would hold.	<p>The 2017 Design Code was prepared and submitted in support of a previous scheme. Elements of the Design Code were designed to accommodate specific uses that are no longer proposed to form part of the development.</p> <p>As the current application scheme is materially different to the 2017 application (and more consistent with the site allocation policy) it is entirely appropriate to prepare and submit a new Design Code that relates to the development proposed (in accordance with Policy C4 of the Local Plan).</p>
26.	Suggests that the Design Code demonstrates a limited assessment and understanding of the site context.	<p>The structure of the application was agreed through pre-application discussions with the LPA and has been updated through the application process.</p> <p>It is considered that the assessment of site context is sufficiently addressed via the Design and Access Statement.</p>
27.	Suggests that there should be greater analysis of local heritage.	The Application Site largely comprises unserviced agricultural land interdispersed with low-density development. The Application, when taken as a whole, appropriately assesses the heritage value of the site and surrounding area (particularly via ES Chapter 5). Whilst the detailed design will aim to integrate with existing development, the heritage value and impacts are considered to be limited. As such, it is not considered necessary for the Design Code to include any additional assessment of heritage value and design.
28.	Suggests that the Design Code should provide greater detail regarding the proposed hierarchy of streets, including street design, carriageway	The commercial development proposed largely centres around the spine road, full details of which are provided as part of this application. It is envisaged (and shown on the illustrative masterplan) that the road will provide direct access to commercial units in Development Zones A, B and C. As such no further design coding is considered to be necessary.

<i>Masterplan and Design Code Audit, dated 7 August 2023 – Pegasus Group</i>	
<b>Issue Raised by BGL</b>	<b>Applicant Response</b>
	<p>widths, surface treatment, inclusivity and pedestrian safety.</p> <p>Although in outline form, it is envisaged that a similar approach will be taken to Development Zone D, a single road providing direct access to commercial development. The Access Road has not been shown in detail to ensure that there is flexibility to respond to the layout requirements of prospective end-users.</p> <p>The residential use proposed on Development Zone E is in outline form. The design coding describes the types of roads which are envisaged as part of the development and sufficient consideration is given to pedestrian and cycle users as part of this process.</p> <p>The scheme actively plans for inclusive access, with dedicated pathways and cycleways proposed, in detail as part of the Strategic Green Infrastructure Network.</p>
29.	<p>Suggests that further detail is needed regarding the diversion and improvement the Public Right of Way.</p> <p>A large proportion of the newly proposed PRoW is shown in detail as part of the Strategic Green Infrastructure (see PRoW route drawings and detailed landscaping plans).</p> <p>The section shown in outline form, across Development Zone B, is expected to follow a similar design approach. It is expected that further details will be secured by way of a condition.</p>
30.	<p>Suggests that a greater level of detail is needed regarding the open spaces proposed.</p> <p>The bulk of open space is proposed, in detail, as part of the Strategic Green Infrastructure network. As such, there is limited need for additional design coding.</p>
31.	<p>Suggests that there is a distinct lack of identity in the proposals with generic aspirations for commercial uses.</p> <p>The Applicant considers much of the site's 'identity' to be led by the Strategic Green Infrastructure with an intention to deliver high-quality and in some cases contemporary forms of architecture which, are set within well landscaped grounds.</p>

**Appendix 2**  
**Ecological Response from Envirotech**

**LANCASHIRE CENTRAL  
RESPONSE TO REPRESENTATIONS MADE BY BROOKHOUSE GROUP LIMITED**

**BGL Submission, dated 31 March 2023**

<i>Letter dated 28 March 2023 – Ecus Ecology</i>	
Issue Raised by BGL	Applicant Response
1. Deciduous Woodland presence/absence discrepancy – the Ecological Appraisal stated a Biodiversity Action Plan (BAP) habitat was present on site along the north boundary of the Site. However, this has not been addressed further within the report with regards to compensation.	Natural England’s mapping of Priority Habitat identifies deciduous woodland to the north boundary of the Site. This is not apparent on the ground and is likely due to the use of satellite imagery rather than ground-based survey by Natural England for mapping. The areas mapped as deciduous woodland by Natural England comprise dense Blackthorn and Hawthorn scrub. The correct categorisation of this habitat was used following ground truthing in the Phase 1 habitat surveys and BNG reports.
2. National policy references – there is confusion regarding the National Planning Policy Framework (NPPF) and which version is being referred to within the Biodiversity Net Gain report. It is both mentioned that the NPPF makes provision for net gain but then states there is a provision for no net loss. The current NPPF no longer uses the language no net loss, therefore a net gain should be sort. This has not occurred with respect to hedgerow habitats.	It is envisaged that future phases of development which are currently only subject to an outline application can accommodate additional hedge planting.  Given the outline nature of the application we would expect the local planning authority to impose a planning condition that secures BNG net gain across the site in accordance with the current legislation.
3. The BNG approach to degraded and lost habitats and consequently the unclear presentation of results/potential over complication of compensation (delays) has become a complicated issue. It is understood that LCC wish to compensate for lost habitats in 2018 due to previous planning application and as such Jacobs had commented on the fact that there should be delays in the habitat creation within the Biodiversity Metric 3.1 (BM 3.1). In order to explain why delays were not	This is a valid point for consideration however any decision maker should be mindful as to how much weight should be applied to it when assessing the planning application. The Applicant acknowledges that habitat was lost through the implementation of a planning permission which has since expired. The Applicant has taken the most robust approach possible, assessing the latest proposals against the historic baseline (prior to habitat removal) instead of the current (post habitat removal) context. This approach is not mandatory but is considered to offer the most robust form of assessment, in that: <ul style="list-style-type: none"> <li>The BNG guidelines are still under development and test. The Applicant’s team have applied the current guidelines as much as possible and have offered clear justification for any site-specific considerations. The decision maker must make an assessment as to whether the assumptions, calculations and assessment is</li> </ul>

<i>Letter dated 28 March 2023 – Ecus Ecology</i>	
Issue Raised by BGL	Applicant Response
<p>required within the BM 3.1 Envirotech discussed how the degraded habitats have a similar value to the habitats that were present within the 2022 surveys. As such confusion has been created as to the approach. Ecus Ltd have suggested a clearer approach which may enable a more robust approach.</p>	<p>sufficiently robust and whether it achieves the appropriate amount of BNG in light of current legislation and planning policy.</p> <ul style="list-style-type: none"> <li>• The author of the BNG report is a chartered surveyor with qualifications in rural/ agricultural valuation and is sufficiently qualified to make the assessment.</li> <li>• The methods used to account for the past value of the site as well as the interim habitats are clearly explained, justified, and are considered to be valid.</li> <li>• The Applicant has voluntarily set a higher threshold for landscape improvements to result in a 'net' gain. Accounting for the past value of the site "woodland" results in a higher level BNG improvements and mitigation required as part of any approved scheme and subsequent reserved matters application(s).</li> <li>• Accounting for past value of the site, which need not technically be done under BNG guidelines, shows the applicants commitment to transparency and ensuring that the site is dealt with on a holistic basis.</li> <li>• Despite the Applicant voluntarily placing greater scrutiny on the baseline habitat levels, the BNG calculations still confirms that the site can achieve a BNG.</li> </ul> <p>It is acknowledged that re-valuation of the site will be required for each phase going forward. This is so that both completed phases on which some BNG units will be surplus and can be carried forward and some phases on which habitat creation in advance of works may be undertaken are accounted for.</p> <p>The approach taken is robust, there are multiple valuation techniques which can be used. We consider that selected approach provides the most representative outcome.</p>
<p>4. River habitat report and mapping discrepancies – the Ecological Appraisal stated that streams were present on the Site, however within the BNG report, streams are not mentioned and not included, only ditch habitats. If streams are present on the Site, these would need to be condition assessed based on the River Condition Assessment (RCA) methodology within the BM 3.1 Technical Supplement (Panks et al. 2022b). There needs to be clarification as to whether streams are present or not and that the correct methodology has been undertaken.</p>	<p>The water courses on site more closely match the definition of ditch than stream or river and as such are accounted for under the ditch criteria in BNG.</p> <p>The author of the BNG report has River Condition Assessment (RCA) certification.</p>

<i>Letter dated 28 March 2023 – Ecus Ecology</i>		
	<b>Issue Raised by BGL</b>	<b>Applicant Response</b>
5.	Offsite compensation approach – the BNG report has identified off-site compensation is required and the BNG report has not identified an off-site compensation site. Off-site compensation has been assumed within the BM 3.1, however, a baseline cannot be assumed as the baseline will affect the net change and therefore percentage net change. Therefore, the off-site compensation detailed in the report may not be accurate. A specific off-site receptor site should be identified and guaranteed, not assumed.	As the later phases of the proposal are outline only, the need for offsite compensation is not yet known.  A calculation has been shown as indicative only and it is expected that the later phases of the development will allow all BNG requirement to be met onsite.
6.	The overarching BNG approach has some complications regarding the combination of the full planning and outline planning phases of the project. There is a concern that if phase 1 of the project moves forward with full planning application there is no separation of the metric results to show how those results relate to the following phases and therefore what responsibility is given to those further phases to meeting the net gain suggested by the report when they are only at an outline application stage.	As each stage is completed ongoing monitoring will be required of the BNG to ensure targets are met. Each new phase will require re-evaluation of the past and new phase to ensure that overall BNG targets can be met rolling forward. This may constrain the final phases of the scheme with a larger BNG requirement than shown on the current illustrative masterplan but this is something which will be reviewed on an ongoing basis as each phase is brought forward. It is anticipated this will be secured by a planning condition.
7.	Discrepancy in BM3.1 tool figures and reporting – the report states that the baseline habitats are worth 128.99 HU, however the BM 3.1 tool states that the baseline habitats are worth 129.52 HU.	The pre-development value of the site is 129.52 HU
8.	Bat survey methodology – the bat surveys were not carried out following the current guidelines. For example, the May transect surveys were only conducted up to 1 hour after sunset rather than the stated 2-3	Rationale of Survey  The methods used comply with those described in Hundt (2012) and Collins, J (ed) (2016). The following extracts from Collins, J (ed) (2016) are used to determine the appropriate level of survey in accordance with the guidelines.



<i>Letter dated 28 March 2023 – Ecus Ecology</i>	
Issue Raised by BGL	Applicant Response
<p>hours after sunset. Also, only four transect surveys were carried out, which underrepresents how many surveys should be undertaken for a moderate-high suitability site for foraging and commuting bats.</p>	<p>Key point 1: Guidelines should be interpreted using professional expertise.</p> <p>“The guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. However, in this scenario an ecologist should provide documentary evidence of (a) their expertise in making this judgement and (b) the ecological rationale behind the judgement.</p> <p>Equally, it would be inappropriate for someone with no knowledge or experience to read these guidelines and expect to be able to design, carry out, interpret the results of and report on professional surveys as a result, simply following the guidelines without the ability to apply any professional judgement.” Section 1.1.3</p> <p>Key point 2: Guidelines are descriptive rather than prescriptive and must be adapted on a case by case basis.</p> <p>“The guidelines should be interpreted and adapted on a case-by case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive.” Section 1.1.3</p> <p>Key point 3: Surveys should be undertaken where it is reasonably likely bats are present and may be affected by the proposal. Where bats are not likely to be present and or will not be affected by the proposal, survey could but need not be undertaken.</p> <p>“It is reasonable to request surveys where proposed activities are likely to negatively impact bats and their habitats. However, surveys should always be tailored to the predicted, specific impacts of the proposed activities (see Section 2.2.2). Excessive, speculative surveys are expensive and cause reputational damage to the ecological profession.” Section 2.1</p> <p>Key point 4: Surveys should be proportionate to predicated impacts.</p> <p>“When planning surveys it is important to take a proportionate approach. The type of survey (or suite of surveys) undertaken and the amount of effort expended should be proportionate to the predicted impacts of the proposed activities on bats. Clause 4.1.2 of BS42020 (BSI, 2013) states that ‘professionals should take a proportionate approach to ensure that the provision of information with the (planning) application is appropriate to the environmental risk associated with the development and its location’ Section 2.2.5</p>

<i>Letter dated 28 March 2023 – Ecus Ecology</i>		
Issue Raised by BGL		Applicant Response
		Very low levels of bat activity were recorded as is consistent with past years surveys. Overall, it is considered the classification of the number and species of bats at the site and the impacts from development have been adequately determined. The additional survey information presented is consistent with that already made available, the level of survey was considered consistent with published guidelines and a good representation of bat use of the site.
9.	Wintering bird survey omission justification – a reference to not undertaking wintering bird surveys based on the previous application not needing the assessments and not supporting suitable habitat for overwintering birds was written within the Ecology Response. However, the breeding bird surveys identified oystercatcher as well as lapwing and several gull species which can often be part of over-wintering bird populations, therefore it would be expected this would trigger further surveys in the form of over-wintering birds.	<p>The site is not mapped by Natural England as being important for populations of overwintering birds.</p> <p>The presence during breeding bird surveys of species oystercatcher as well as lapwing and several gull species were non-breeding/ flying over site. The site does not provide suitable habitat for supporting notable species of overwintering bird.</p> <p>Lapwing and Oystercatcher are associated with coastal areas in winter moving inland in spring to nest. They would not form a normal assemblage for overwintering bird populations at this site which is too far from the coast for daily flight.</p> <p>Their presence in spring is consistent with their movement inland to breed.</p>
10.	Construction Environment Management Plan – this has been justified as only being required as a planning condition, however it would be important to make sure that the Himalayan balsam <i>Impatiens glandulifera</i> on the Site is appropriately dealt with and to make sure that the landscaping of Phase 1 of the Site at least will meet the BNG requirements attributed to it.	This is acknowledged and a CEMP is proposed and should form a planning condition. The timing of works is integral to the CEMP as are up to date assessments of current site conditions which would be undertaken for condition discharge before works commence on site.
11.	Missing bat and bird reports – there have been no specific bat or bird survey reports detailing methodology, results or recommendations. There are only short responses.	Survey methodology, results and recommendations form part of the submitted planning documents, namely Chapter 12 of the Environmental Statement and its associated appendices, and the subsequent clarification documents submitted on 22 December 2022 and 24 February 2023.

**Appendix 3**  
**Highway Response from WSP**



## Introduction

WSP produced a Transport Assessment (TA) to accompany a planning application for the Lancashire Central development proposed on part of the wider Cuerden Strategic Site (Planning Ref: LCC/2022/0044).

Comments have been submitted by Mode Transport Planning on behalf of Brookhouse Group Limited, in a tabulated (undated) document issued alongside BGL's wider response and uploaded to the application webpage on 4 April 2023, and via a separate technical note dated 19 September 2023.

The comments within the Mode Transport Planning note have been summarised in the table below, with reference to the relevant paragraph numbers noted. Repeated comments have been grouped together to avoid repetition of responses to comments. Responses to these comments are provided, giving further clarification and relevant additional information on the comments raised by Brookhouse Group Limited.

## Response to comments published on 4 April 2023

Brookhouse Group Limited Comments	Response to Comments
<b>Existing Conditions (Section 1.2)</b>	
Old School Lane unsuitable pedestrian route due to width, forward visibility and speed limit (1.2.1)	<p>Old School Lane is not considered to be unsuitable for pedestrians and cyclists given that it is a lightly-trafficked route with relatively straight alignment. Notwithstanding this, Parameter Plan 2 (Highways and Access) produced by Fletcher Rae which accompany the planning application shows the proposed walking and cycling movements within the site. A new PRoW is proposed to run parallel to Old School Lane, connecting the A582 Lostock Lane to Stoney Lane and the existing PRoW which runs east-west along the southern edge of Zone A. WSP Drawing <i>84465-WSP-XX-DR-011 P03</i> shows that the proposed internal highway layout includes footways on both sides of the carriageway providing an additional north-south route. Multiple alternatives to Old School Lane are provided for this North-South movement and pedestrian permeability is promoted within the site.</p> <p>We are aware of the current BGL planning application for a new access and alterations to the Old School Lane / A582 junction (SRBC Ref: 07/2022/00245/FUL), which may include pedestrian facilities at the northern end of Old School Lane which would improve pedestrian conditions in this area. In respect of</p>

	<p>traffic levels on Old School Lane, we consider that vehicle traffic levels on the southern section of Old School Lane would not materially change based on our understanding of the Brookhouse Group proposals, with the majority of traffic arising from the upgraded junction travelling west into the potential development site west of Old School Lane.</p>
<p>Stoney Lane unsuitable pedestrian route due to width and speed limit (1.2.2)</p>	<p>Stoney Lane is not considered to be unsuitable for pedestrians and cyclists given that it is a lightly trafficked route with relatively straight alignment. Notwithstanding this, Parameter Plan 2 (Highways and Access) shows the pedestrian link between Zone A and the proposed residential area – this is considered to be the main pedestrian route to/from the development from/to Stanifield Lane. The layout of the residential area will prioritise pedestrian movements and promote a clear pedestrian access point. This route will link onto Stanifield Lane close to the bus stops and the pedestrian crossing as shown on drawing 84465-WSP-XX-DR-018 rev P01. This drawing also shows a proposed footway and traffic calming measures on Stoney Lane which will prioritise pedestrian and cycle movement along this route. Therefore, pedestrian permeability through the site will be prioritised and provide a suitable alternative route to Stoney Lane.</p>
<p>Walking Isochrones uses inappropriate pedestrian routes (1.2.3)</p>	<p>The walking isochrones map includes the PRow which is proposed to connect the A582 with the internal footway provision adjacent to the internal carriageway and is therefore not reliant on the use of Old School Lane. It also includes the existing PRow which connects to Stoney Lane. The footway provision on-site connects to existing footway provision and therefore the walking isochrone map presented in the TA remains appropriate.</p>
<p>Lack of Suitable crossing facilities along the A582 (1.2.4).</p>	<p>The proposed off-site mitigation includes a signalised crossing on the A582 to the east of its junction with Old School Lane. This provides a more direct route to/from the site than crossing at A582 / Stanifield Lane roundabout and corresponds with the likely pedestrian desire line in this direction linking to the pedestrian provision on-site. See drawing 84465-WSP-XX-DR-015 for further information.</p>
<p>Two of the four PRow listed are not in land within the applicants control and therefore changes to these are not possible without third party land agreements. (1.2.5)</p>	<p>Parameter Plan 2 (Highways and Access) shows the proposed changes to the PRows associated with the development. The plan shows the existing PRows which are unaffected, those which will be diverted/stopped up and new proposed PRows within the site. The changes proposed are all within the red line boundary of the Lancashire Central site. PRows outside of the red line boundary are unaffected.</p>
<p>No review as to whether the bus stops are within recommended walking distances (1.2.7). Parts of the</p>	<p>The bus stops are located on Stanifield Lane, and as shown on Figure 1.1 of the Mode Transport Planning note, the residential development and the main mixed-uses in Zone A will be within 400m</p>

<p>site are not within walking distance to bus route or rail (1.2.10-1.2.11 / 1.6.7) and many local amenities are subject to at least a 25-minute walk (1.2.12).</p>	<p>walking distance of the bus stops. Pedestrian access to these bus stops will be prioritised within the finalised layout of the site and proposed pedestrian crossing points will facilitate crossings to northbound bus stops.</p> <p>As noted within the TA, the internal highway layout has been designed to be suitable for bus movements if future demand for re-routing buses into the site becomes a preferred option.</p> <p>There are a number of local amenities proposed on the site which will encourage internal trips via foot, and pedestrian routing to off-site facilities is improved via the addition of pedestrian crossings on the A582 and Stanifield Lane.</p>
<p><b>Proposed Development (Section 1.3)</b></p>	
<p>Stanifield Lane 4-arm residential access requires widening within the Lancashire Cricket land, which is not included within Cuerden Strategic Site red line boundary (1.3.1). For the 3-arm layout, it has not been demonstrated that this access can be delivered independently of LCCC scheme and within the red line boundary. (1.3.2)</p>	<p>It is likely that the 4-arm layout will be brought forward given that the Farington Cricket development was recently approved. The 4-arm site access has been reviewed by LCC Highways Development Control as part of the planning applications for both Farington Cricket and Lancashire Central.</p> <p>The ‘WSP_LCC_Lancashire Central Drawing review’ technical note (issued to LCC on 10/01/23) outlines the discussions between LCC and the project team regarding this site access junction. The note includes a revised drawing of <i>84465-WSP-XX-DR-003: Stanifield Lane Access Junction to Residential Phase Illustrative only</i>’ which is the current proposed layout for this access junction. The current layout is illustrative only and details will be discussed further at reserved matters stage.</p> <p>The principles of the three-arm layout were presented within MMD-370964-C-DR-00-XX-0002, and if a three-arm layout would be required (for instance, if the development of the Farington Cricket development was not implemented) this would be discussed further and included within Reserved Matters application.</p>
<p>The masterplan shows that a ransom strip has been left between the roundabout and the Future Phase Zone which will potentially prevent further development (1.3.3)</p>	<p>This is not correct. The Proposed Development includes access onto the Future Development Zones (ie land owned by Brookhouse Group Limited) via the internal access roads. Sufficient detail is provided both within Parameter Plan 2 (21017-FRA-XX-ZZ-DR-A-9112 Revision P20 and the Highways Layout Plan (84465-WSP-XX-DR-011 Revision P05 to demonstrate this point.</p>
<p>Link road is not included in this application and requires third-party land to be delivered – therefore no</p>	<p>The TA has been undertaken assessing the full build out of the wider Cuerden Strategic Site (CSS). The Proposed Development includes access onto the Future Development Zones (i.e. land owned by</p>

<p>highway link, pedestrian, cycle link or public transport link. (1.3.4 / 1.3.5 / 1.3.6 / 1.6.3 / 1.6.5 / 1.6.6)</p>	<p>Brookhouse Group Limited) via the internal access roads which include pedestrian/cycle provision and have been designed to accommodate buses if the need for re-routing of bus routes is required.</p>
<p><b>Policy Review (Section 1.4)</b></p>	
<p>It has been demonstrated that this is not considered to be a sustainable development. (1.4.1 / 1.4.3 / 1.4.4 / 1.4.5 / 1.4.10)</p>	<p>No issues have been raised by LCC Highways or National Highways on the sustainability of the site and this was not raised as a concern with the consented application. It has been demonstrated within the TA that the site will include walking and cycling infrastructure and a range of facilities on-site which will promote internal and linked trips. Bus stops are currently located on Stanifield Lane, and pedestrian access to these will be improved as noted in the comments above. Should the demand for buses to be re-routed onto the site become apparent, further discussions with relevant stakeholders will be held. As noted above, the design of the internal highway layout included consideration for future bus routing through the site.</p>
<p>Policy C4 of SRBC Local Plan requires comprehensive development of the site” which is not achieved as part of these proposals as a large area of the strategic site has been removed from the planning application and ransom strips have been included which could prevent the delivery of the allocated site. (1.4.6 / 1.4.7)</p>	<p>The scheme does allow for the comprehensive redevelopment of the allocated land. The application is consistent with the definition of ‘comprehensive development’ as set out in the glossary of the Local Plan. This recognises that individual parcels of land within a larger site may be delivered at varying times, but that all development should take place in line with a wider strategic framework. In this instance, that framework is set out within the 2015 Masterplan, which has been adopted by SRBC for development management purposes.</p> <p>The current application makes appropriate allowances for the remaining parts of the CSS to be developed, by indicating the locations of future access points through to BGL-owned land.</p> <p>Given that the land owned by BGL does not form part of the application, it is not possible to clearly mark this route on any document or drawing intended for formal approval, but the intended links are clearly shown on Parameter Plan 2. This drawing demonstrates that:</p> <ul style="list-style-type: none"> <li>■ The intention is that access to the northern most plot of BGL land will be provided via Development Zone E, which features access to Stanifield Lane. This approach, serving both plots of land via a single point of access, is consistent with the approved Masterplan.</li> <li>■ The intention is that access to the southern plot of BGL land is provided via Development Zone D. Two points of potential access are provided to the BGL land.</li> </ul>

	<ul style="list-style-type: none"> <li>■ The intention is that access to the central plot of BGL land is provided via Development Zones A and D. A total of three points of access are shown.</li> </ul> <p>It is therefore evident from Parameter Plan 2 that a comprehensive network of access roads is being planned for and will be established into and through the site. The exact positioning of those roads through the BGL land will be confirmed should they progress their own applications.</p> <p>The deliverability of development on BGL-owned land is dependent upon separate planning permissions which must be sought by BGL or any subsequent landowner or developer. It is noted that BGL have indeed made applications which seek to provide access to the BGL-owned land via Stanifield Lane and Old School Lane. Comprehensive development can be assured whatever the outcome, whether separate and independent access is provided, linked access (both via the highway and LCC-owned land), and if the BGL-land is dependent upon access via LCC-owned land. As such, it can be demonstrated that the current proposals would not prejudice the future development of BGL-owned land.</p>
<p>Policy C4 states that planning permission will be agreed subject to “an agreed masterplan”, this cannot be met as the application has been submitted to LCC and will not be approved by SRBC (1.4.8 / 1.4.9)</p>	<p>Policy C4(a) required a masterplan to be drafted which would guide the comprehensive redevelopment of the Site. This Masterplan was drafted by AECOM on behalf of LCC and submitted to SRBC for approval. The Masterplan was subsequently adopted for Development Management Purposes by SRBC’s Planning Committee on 22 April 2015 and forms a material planning consideration in the determination of planning applications relating to the Site. The Adopted Masterplan covers the entirety of land allocated as part of the CSS and is sufficiently flexible to guide this Application without the need for an amended or replacement Masterplan to be adopted.</p>
<p><b>Trip Distribution and Generation (Section 1.5)</b></p>	
<p>New trip rates have been obtained, including for the B2/B8 Uses, which are lower than the original trip rates in the Mott MacDonald (MM) TA (dated 20th January 2017). If the previous trip rates were used the trip generation would be higher than the approved scheme (1.5.1 / 1.5.2 / 1.5.3 / 1.5.4 / 1.5.5).</p>	<p>As outlined within Table 3.1 of the WSP Lancashire Central TA, multiple new land uses are introduced in the current scheme, the mix of employment uses has changed with less office space and more industrial units / industrial warehousing and the non-food retail and Ikea use has been removed. TRICS has been used to provide trip rates for these changes in land use, and the mix of land uses has contributed to the change in total trip generation.</p> <p>It is not clear from the Mode Transport Planning note how they have calculated the trip generation for the current proposals using the approved Mott MacDonald trip rates (Table 1.1). Trip rates for the new land uses were not presented previously and therefore it is not possible to provide a full comparison using the previously agreed trip rates.</p>



	<p>The MM trip rates for B2/B8 were a combination of Industrial Units, Parcel Delivery Warehousing and Commercial Warehousing – combined to create one set of trip rates applied to B2/B8. Within the WSP Lancashire Central TA, individual trip rates have been applied to Industrial units and Industrial Warehousing to better reflect the proposed proportion of units and warehousing within the site. However, for the Future Phase land, the previous B2/B8 trip rates have been used due to no changes in the assumed land uses on these plots. The use of this mix of trip rates provides an up-to-date forecast of the traffic associated with the proposed mix of employment uses within the site.</p>
<p>There is no confirmation in WSP’s TA that the new trip rates have been agreed with LCC Highways and/ or National Highways as the scoping response is not attached. (1.5.3)</p>	<p>In post-application discussions with NH, the trip rates used have been clarified and it has been confirmed that they agree with the trip rates used. To date, LCC has raised no objection to the trip rates used, which were presented at scoping stage within the reviewed TA scoping note.</p>
<p>Baseline traffic data from 2016 has been used in the assessments which is considered too old to be used for the application. No analysis has been provided in the TA to demonstrate that the flows are suitable. (1.5.7)</p>	<p>During the scoping of the TA LCC Highways confirmed that they had a moratorium on collating new traffic count data due to the impact of the Covid-19 pandemic on travel. LCC requested the use of pre-covid traffic surveys. Within the TA, survey data from 2016 was sourced from a previous planning application for the Cuerden Strategic Site, as agreed during scoping correspondence with LCC Highways.</p> <p>In response to post-application comments, the 2016 surveys have been compared to more recent available data on the local network and the 2016 data has been shown to have higher peak hour traffic flows than those from 2022 and 2023. The 2022 and 2023 data was sourced from WebTRIS and from data provided by LCC Highways Development Control from surveys undertaken on Stanifield Lane in November 2022. A further survey was undertaken at the A6 / A582 junction in June 2023 to reinforce this conclusion. The above survey comparisons are presented within the WSP Base Year Growth Rate Assumptions Technical Note dated 8<sup>th</sup> June 2023.</p> <p>The 2016 survey data therefore provides a robust, worst-case baseline traffic flows compared to more recent data available from 2022 and 2023. As a result, the assessments included within the TA represent robust scenario traffic flows.</p>
<p>WSP state that they have used TEMPRO Growth factors to uplift background traffic growth from the 2016 counts to the 2032 and 2037 future years; however, the growth rates applied to the 2032 growth is the same as the growth rate applied by MM for the</p>	<p>TEMPro growth rates have been derived using the methodology outlined within the MM Transport Assessment, with adjustments to background housing and employment growth applied within TEMPro when calculating growth rates to account for committed developments. This avoids double counting of traffic flows associated with committed developments. LCC Highways noted that they would ‘expect</p>



<p>2024 growth. This is despite there being an additional 8 years included. (1.5.8)</p>	<p>where appropriate that growth rates are revised to negate against double counting' and therefore this approach is deemed reasonable.</p> <p>The quantum of committed developments included within the WSP Lancashire Central TA is higher than that considered within the MM Transport Assessment, therefore the overall TEMPro growth rate which has been calculated is reduced due to the consideration of additional committed developments. As a consequence, the comparison between the MM and WSP growth rates is not a direct comparison, and the WSP growth rates remain valid.</p> <p>The traffic growth has been adjusted to reflect the lack of traffic growth between 2016 and 2023 (see point on baseline traffic data earlier in table). The WSP Base Year Growth Rate Assumptions Technical Note dated 8th June 2023 has been presented to National Highways and LCC Highways confirming that due to there being zero growth between these years, it is appropriate to only use Tempro growth from 2023 onwards.</p>
<p>The proposed LCCC facility has been included as a committed development, although the trip generation for this, which was also undertaken by WSP, is disputed (1.5.9)</p>	<p>The trip rates and trip generation for the LCCC facility had been agreed with LCC Highways Development Control as part of the TA scoping and post-application discussions for the Farington Cricket site. Planning permission for the facility has since been granted and it is therefore correct to view the scheme as a form of committed development.</p>
<p style="text-align: center;"><b>Active Travel and Sustainable Transport (Section 1.6)</b></p>	
<p>Drawing MMD-370964-C-DR-00-XX-0002 shows the proposed cycle infrastructure improvements on Stanifield Lane, however this has not been updated to align with the updated access proposals and therefore does not relate to the current application (1.6.4).</p>	<p>WSP drawings (84465-WSP-XX-DR-018 P01 and DR-014 P03) are the most up-to-date versions of the proposed changes on Stanifield Lane, specifically at the proposed residential access point and these should be used to understand the current proposals. These have been reviewed by LCC Highways and provide an illustrative layout of the residential site access junction and the proposals along Stanifield Lane in this location.</p> <p>Cycle desire lines have been catered for within the site with the proposed cycle infrastructure. This will encourage cycle users to use the on-site provision where appropriate.</p>
<p style="text-align: center;"><b>Traffic Capacity Assessments (Section 1.7)</b></p>	
<p>the reduction in trips is based solely on the change to the trip rates; therefore, the mitigation measures may</p>	<p>See comments above relating to trip generation.</p>

<p>not be sufficient to accommodate the proposed development (1.7.1)</p>	
<p>Modelling assumes link road (1.7.2 / 1.7.4 / 1.7.10) Table 1.4 shows the number of trips which would have been diverted off the A582 corridor as a result of the introduction of the link road in the consented scheme, which have not been considered in the Base + Committed Scenario in the WSP TA. (1.7.3)</p>	<p>The modelling assumes the future phase land is accessed solely from the M65 terminus via the Lancashire Central internal road network.</p>
<p>The proposed mitigation schemes for the Stanifield Lane / A582 junction and the A582 / A6 junction are the same as those which were previously approved as part of the previous development. It is unclear if WSP have included these committed mitigation schemes as part of the DM modelling or if they have just included the committed flows from the previous application. (1.7.5)</p>	<p>This comment is no longer relevant, the latest modelling does not refer to the committed mitigation schemes and simply reviews the effect of the Lancashire Central development (and associated mitigation) as a stand alone scheme.</p>
<p>The consented scheme has been included as a committed development in the DM modelling (1.7.6 / 1.7.7 1.7.12)</p>	<p>Following discussions with National Highways and LCC highways this is no longer included as a committed development.</p>
<p>The residential site access junction has not been assessed as a standalone junction without the proposed LCCC site access (1.7.11)</p>	<p>It has been assumed that the 4-arm layout will be required due to the progress to date with the Farington Cricket Application. If this is not the case, then the 3-arm junction can be assessed when this junction is subject to detailed planning application.</p>
<p>National Highways requested merge / diverge assessments in their scoping response which have not been provided. (1.7.13)</p>	<p>Merge Diverge assessments have been provided in response to post-application discussions with National Highways.</p>



<p>Analysis and commentary have not been provided to understand when the mitigation measures are required and when they will be provided. (1.7.14 / 1.7.15).</p>	<p>The phasing of the mitigation will be discussed with the relevant authorities, namely LCC Highways and National Highways as detailed plans for the development come forward.</p>
<p><b>WSP Summary and Conclusion (Section 1.8 and 1.9)</b></p>	
<p>All points already addressed in above responses</p>	

## Response to comments published on 29 September 2023

Brookhouse Group Limited Comments	Response to Comments
<p><b>Calls for a road connection to be made from the A49 and M65 Terminus Roundabout, via the Central Future Phase Plot, onto Stanifield Lane to alleviate traffic on the A582.</b></p>	<p>Such a connection is envisaged and shown via the access points proposed via the northern and western boundaries of the Central Future Phase Plot.</p>
<p><b>Calls for a link road connection to be made from Zone D into the central future phase plot.</b></p>	<p>Such a connection is shown on the Parameter Plans. The precise positioning of the access point can be adapted to suit any detailed layouts which are proposed.</p>
<p><b>Calls for a road connection to be made from Zone D to the southern future phase plot.</b></p>	<p>Such a connection is shown on the Parameter Plans. The precise positioning of the access point can be adapted to suit any detailed layouts which are proposed.</p>
<p><b>Notes that the identified departures from [design] standards for the proposed site access have not been addressed via the updated drawings. Calls for agreement from National Highways should be obtained to ensure that site access is deliverable.</b></p>	<p>National Highways has withdrawn its holding objection and is content with the scheme subject to conditions. As part of this process provisional agreement to the identified Departures from Standard has been obtained from National Highways.</p>
<p><b>Suggests that updated trip assessments need to be submitted.</b></p>	<p>Updated modelling work has been submitted and agreed, which has included amendments to traffic distribution and assignment, as agreed with LCC Highways and National Highways. National Highways has withdrawn its holding objection and is content with the scheme subject to conditions.</p>



<b>Brookhouse Group Limited Comments</b>	<b>Response to Comments</b>
<b>Calls for a condition to require a connection between Zone A and B to be provided through to Wigan Road.</b>	A connection will be provided through Zones A and B to Wigan Road as shown on the submitted Parameter Plans.
<b>Raises a number of queries on technical grounds.</b>	National Highways has withdrawn its holding objection and is content with the scheme subject to conditions.