



AshtonHale

Representations to Central  
Lancashire Local  
Plan Regulation 19  
Consultation on behalf of Logik  
Strategic Land

Cuerdale Employment Sites, Land West of Samlesbury, Lancashire

14 April 2025

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**Report title:** Representations to Central Lancashire Local Plan Regulation 19 Consultation

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**For and on behalf of AshtonHale Limited**

# 1. Executive Summary

- 1.1 Logik Strategic Land Ltd ('Logik') has more than 50 years' experience in developing strategic sites that create inspiring places for people to live, work and play – places that people can be proud of. Based in South Ribble, Logik has worked with the Council to help deliver important developments, including providing assistance to the Council in bringing Lancashire County Cricket Club and the National Cyber Force (NCF) development to the borough.
- 1.2 Logik submitted an outline planning application to South Ribble Borough Council ('SRBC') in December 2022 (ref: 07/2023/00035/OUT) for the first phase of a new employment-led development across three development plots on Land West of Samlesbury. The planning application was submitted following extensive and positive pre-application discussions with key local politicians and Senior Planning Officers. These representations are separate to the ongoing discussions with SRBC officers on the application.
- 1.3 In parallel with promoting its planning application, Logik has also engaged with the Council at all key stages of the Local Plan process to date. Most recently, this included detailed representations to the Central Lancashire Local Plan (CLLP) Preferred Options (Part One) in February 2023, supporting (at that time) a preferred growth option around Cuerdale and the potential for Green Belt release in South Ribble.
- 1.4 Logik notes that the Central Lancashire Authorities (CLA) have now opted to progress the draft CLLP under the transitional arrangements contained within the December 2024 National Planning Policy Framework (NPPF) and claims it has met the 80% housing requirement. Given Logik's interests in promoting its sites for employment-led development, these representations do not include any commentary or critique of the housing numbers. However, Logik is concerned that, by rushing the Regulation 19 consultation on the CLLP to take advantage of the transitional arrangements, it has neglected its responsibilities to plan for growth, deliver on its own vision, and based its employment policies on a deeply flawed evidence base. This renders the current draft CLLP unsound.
- 1.5 Logik has fundamental concerns about the soundness of the draft CLLP, against all of the relevant tests set out in the NPPF. These principally relate to the following:
- Reliance on a Flawed Evidence Base that does not correctly identify the area's objectively assessed employment needs;
  - Failure to consider Green Belt release based on flawed evidence base;

- Failure to consider the National Cyber Force development;
- Failure to adequately account for the deliverability of Employment Land;
- Deferring strategic matters to a later plan period; and
- Inconsistency with the overarching economic objective for sustainable growth as set out in Paragraph 8 of the NPPF.

- 1.6 Fundamental to Logik's concerns about the soundness of the draft CLLP are the findings of a detailed report by Wisser Consulting, which reviews the CLA's employment land evidence base produced by the BE Group. This includes an assessment of both employment land need and employment land supply. Logik strongly considers that the CLLP does not robustly seek to meet the area's objectively assessed employment needs, nor properly consider the requirements of all available sites. The current approach fails to account for the true scale of employment demand and the need for realistic land supply, both now and including the NCF, potentially sidelining vital economic opportunities for the sake of avoiding a Green Belt review.
- 1.7 Logik's position is that the CLLP must address the growing shortfall in employment land and the region's need for strategic land use to foster growth based on new and robust employment land evidence and, if required, a Green Belt review. The overestimation of available land and the underestimation of demand presents a significant risk to the region's economic future. A strategic site allocation at Cuerdale is a critical part of the solution, offering much-needed employment space located near the Samlesbury Enterprise Zone and the NCF campus.
- 1.8 Despite the site being located on Green Belt land, it is Logik's position that the only contribution that the proposed Strategic Site makes to the Green Belt is a moderate impact in regard to Purpose 3 - to assist in safeguarding the countryside from encroachment. Logik agrees with the assessment of the CLA's previous Green Belt Designations Study (2022), which considered the ratings for the wider Parcel 14's strategic contribution to the Green Belt purposes for all other purposes was "limited/no" contribution.
- 1.9 It is also noted that a potential Strategic Site at Cuerdale was previously included within a wider "Preferred Growth Option" in the Preferred Options - Part 1 draft CLLP. The initial site assessment was included within the South Ribble Site Profiles as "Site Profile 26", which concluded that the site is suitable, available and achievable. There is no evidence or justification provided as part of the Regulation 19 draft CLLP to specifically address why this Preferred Growth Option has been discounted.

- 1.10 Logik considers that its strategic importance to regional economic growth, and lack of impact on the Green Belt, justifies the inclusion of a Strategic Site Allocation at Cuerdale in this development plan, and the strategic case for the Cuerdale development is compelling. The site's proximity to key employment hubs, its excellent transport links, and its potential to support high-value industries such as cybersecurity and defence should make it an essential component of the region's economic strategy.
- 1.11 Logik has, therefore, suggested that the CLLP needs to be updated to reflect the serious flaws in the underlying evidence base that currently renders the plan unsound. Logik has also proposed a series of modifications to strategic Policies SS2 and EC1, and the insertion of a new policy to reflect a Strategic Site Allocation at Cuerdale, to address the areas of the draft CLLP it considers to be unsound.
- 1.12 Logik confirms that it would wish to take part in any relevant Hearing Session(s) as part of the Local Plan Examination in Public.
- 1.13 Logik would be happy to discuss any element of these representations with the CLA in more detail, and would be happy to work with officers to ensure that the future iterations of the CLLP adequately address the points raised, including the potential content of a draft Strategic Site Allocation at Cuerdale.

## 2. Introduction

- 2.1 These representations have been prepared by AshtonHale Ltd on behalf of Logik Strategic Land Ltd (hereby referred to as "Logik") in response to the Central Lancashire Local Plan (CLLP) Regulation 19 Consultation.
- 2.2 These representations are made in relation to Logik's interest at Cuerdale (referred to as the "Cuerdale Employment Sites") which form part of the wider proposals for a new Cuerdale Garden Village around Salmesbury.
- 2.3 A plan showing Logik's land interests in Cuerdale edged red is attached at Appendix 1.
- 2.4 These representations intend to cover the following:
- A background to Logik's interest in the CLLP and its representations;
  - Commentary on the soundness of the CLLP;
  - The case for a strategic site allocation at Cuerdale;
  - Logik's proposed modifications to the CLLP; and
  - Logik's intentions for participating at future hearing sessions.
- 2.5 Whilst this standalone document has been submitted to the Central Lancashire Authorities (CLA) via email, a version of the text has also been submitted online via the Councils' online consultation portal.

### 3. Background to Logik's Representations

- 3.1 Logik Strategic Land Ltd ("Logik") has more than 50 years' experience in developing strategic sites that create inspiring places for people to live, work and play – places that people can be proud of. Creating a legacy is at the heart of absolutely everything Logik does, which is why their collaborative approach with funders and local authorities has impact and ensures they're able to unlock and transform new spaces. Based in South Ribble, Logik has worked with the Council to help deliver important developments, including bringing Lancashire County Cricket Club to the borough and providing assistance to the Council in its discussions with Central Government to bring the National Cyber Force development to the borough.
- 3.2 Logik submitted an outline planning application to South Ribble Borough Council ('SRBC' or 'the Council') in December 2022 (ref: 07/2023/00035/OUT) for the first phase of a new employment-led development across three development plots on Land West of Samlesbury.
- 3.3 The planning application was submitted following extensive pre-application discussions with key local politicians, including the then-Leader and Head of Planning. All of the pre-application consultation was positive and encouraged Logik to spend considerable time and costs in working up and submitting the application on the clear understanding that the principle of the development was supported by the Council in line with the aspirations of emerging planning policy (including the Preferred Options - Part 1 draft of the Central Lancashire Local Plan) and discussions with central Government around the creation of the emerging National Cyber Force centre (NCF) near Samlesbury.
- 3.4 The outline application calculated the benefits of the proposed development at the time of submission as including the following:
- Job creation -
    - During construction the development would create 741 person years of construction-related employment
    - A total of 2,268 net direct and direct jobs will be generated, in the logistics and industry, office, retail and hotel sectors
  - Gross Added Value - A GVA of £122 million per annum
  - Business Rates Receipts - Annual business rates of £5.5 million will be produced

- Capturing market demand - The sites will provide for large, flexible B2/B8 floorspace to particularly help the logistics sector grow in Central Lancashire. The sites are in an advantageous location near the M6, and will be attractive to future occupiers.
- Providing infrastructure to support the NCF - The sites will provide strategically located employment space, and the potential for hotel bedrooms for temporary staff, near the NCF to capture the spin-off effects for the local economy. Again, this will be quantified further in an upcoming submission.

3.5 Discussions on the outline planning application are ongoing, and these representations are entirely separate to the discussions with SRBC officers on the application.

3.6 In parallel with preparing its planning application, Logik has also engaged with the Council at all key stages of the Local Plan process to date. Most recently, this included detailed representations to the CLLP Preferred Options (Part One) (letter dated February 2023); the representations which follow should be read in conjunction with that submission (Appendix 2).

3.7 The key comments to the CLLP Preferred Options - Part 1 consultation were as follows:

- In paragraph 3.4 of the Preferred Options Local Plan, it is stated that key strategic locations which have received planning permission and/or are allocated in the existing Local Plan will form the focus for initial delivery of housing and employment requirements in the initial stages of the plan. This includes the BAE Systems, Samlesbury Site, and recognition is given that this site will be the focus of delivery for the National Cyber Force (NCF) Campus.
- The Cuerdale Employment Sites are located in close proximity to the Samlesbury Enterprise Zone (EZ) and the location of the NCF and present an excellent opportunity to capture investment from businesses that have an inherent interest in locating close to the NCF campus in providing supply chain services and activities, creating a cluster of complementary businesses in the area.
- The Cuerdale Employment Sites were included as a Preferred Growth Option as part of the wider Cuerdale Garden Village in the Preferred Options Local Plan. The initial site assessment is shown within the South Ribble Site Profiles, and it is titled Site Profile 26 and concludes that the site is suitable, available and achievable.
- The Preferred Options Part 1 set out the employment land requirements for the plan period 2023 - 2038 under Policy Direction 14 (Scale of Economic Growth), including

77.66ha in South Ribble. There was, however, an identified shortfall in employment land supply against the requirement, with South Ribble's further need over the plan period being 25.68ha, particularly in sites suiting both larger B8 uses and offices. Logik's position was that its outline planning application could assist in meeting this need.

- The Cuerdale Employment Sites fell entirely within parcel P14 of the Green Belt Designations Study (2022, prepared by LUC). The ratings for the parcel's strategic contribution to the Green Belt purposes for Parcel P14 concluded that the only contribution that Parcel P14 makes to the Green Belt is in regard to Purpose 3 - to assist in safeguarding the countryside from encroachment, with all other purposes deemed to make a limited or no contribution. Logik supported the consideration of potential Green Belt release in South Ribble.

## 4. Planning for Growth

- 4.1 A new National Planning Policy Framework (NPPF) was published in December 2024. This included transitional arrangements whereby local authorities can continue with the preparation of an existing draft Local Plan taking account of lower housing requirements provided they commence the Regulation 19 Local Plan consultation by 12<sup>th</sup> March 2025 and the proposed housing requirement is at least 80% of what the requirement would be using the new formula.
- 4.2 Logik notes that the CLA has opted to progress the draft CLLP under these transitional arrangements and claims it has met the 80% housing requirement. Given Logik's interests in promoting its sites for employment-led development these representation do not include any commentary or critique of the housing numbers. However, Logik is concerned that by rushing the Regulation 19 consultation on the CLLP to take advantage of the transitional arrangements it has neglected its responsibilities to plan for growth, deliver on its own vision, and based its employment policies on a deeply flawed evidence base. This renders the current draft CLLP unsound.
- 4.3 The purpose of this Chapter is highlight the requirements of the NPPF, as it was, on which the draft CLLP needs to be considered, as well as highlighting some of the relevant strategic policies with the Regulation 19 draft CLLP pertinent to Logik's landholdings and representations. Logik's commentary on whether the draft CLLP is sound in relation to these points is then contained in future Chapters.

### National Planning Policy Framework

- 4.4 The NPPF (Dec 2023) states at Paragraph 15 that the planning system should be genuinely plan-led, and that succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 4.5 NPPF Paragraph 16 states that Plans should:
- a) *be prepared with the objective of contributing to the achievement of sustainable development;*
  - b) *be prepared positively, in a way that is aspirational but deliverable;*

*c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*

*d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*

*e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*

*f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

4.6 Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

*a) housing (including affordable housing), employment, retail, leisure and other commercial development;*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

*c) community facilities (such as health, education and cultural infrastructure); and*

*d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

4.7 Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

## **Draft Regulation 19 Central Lancashire Local Plan (draft CLLP) – Key Strategic Policies**

4.8 The Spatial Vision: Vision Central Lancashire 2041 and beyond (page 19) states that “*growth and regeneration of our city and town centres and delivery of new employment opportunities*

*will continue to strengthen economic prosperity, making Central Lancashire a key economic centre for the North West."*

4.9 Strategic Objective 4 - Economic Prosperity states that:

*"To provide a range of employment and economic growth opportunities in sustainable locations. Promoting Central Lancashire as the economic centre for Lancashire, protecting and enhancing Preston City Centre's role as Lancashire's key shopping, leisure, tourism, and cultural destination and recognising its strategic importance within the wider Lancashire region and beyond. Prioritising building on the infrastructure improvements within City Deal, delivering enhanced digital connectivity, attracting inward investment, and delivering community wealth building."*

4.10 Policy SS1: Development Patterns states that "1. New housing, employment and commercial growth and associated infrastructure will be focused on the most sustainable locations in Central Lancashire..." and that "3. New development will be focussed within settlement boundaries and on allocated sites as shown on the Policies Map".

4.11 Policy SS2: Settlement Hierarchy states that the scale and location of development growth and supporting investment across Central Lancashire will reflect a settlement hierarchy, with the Preston Urban Area (Tier 1) being the primary focus for development growth and investment, with the largest amount of new development will be directed here. This will be delivered through a combination of redevelopment and regeneration activity and major new development to meet strategic general housing, employment, and commercial development needs.

4.12 "Strategic Site Allocations - Introduction" states at paragraph 3.22 that: "Planned new development at a strategic scale brings a range of benefits, such as securing infrastructure alongside growth, and provides an effective source of development delivery over time. Strategic sites are central to the delivery of the spatial strategy, Policies SS1 and SS2, and achieving sustainable development." The draft CLLP identifies 4 Strategic Site Allocations covered by Policies SS3 (Preston North/Bartle); SS4 (Fulwood Barracks), SS5 (Preston West), and SS6 (Pickerings Farm, Penwortham).

4.13 Policy EC1 (Strategic Policy): Scale of Economic Growth states that over the Plan period, provision will be made for a minimum of 173 hectares of employment land to support both local and wider strategic employment needs, and that economic growth and employment land supply will be provided for through existing and new employment allocations and extant planning permissions.

4.14 In terms of Employment Land Distribution, Policy EC1 states that Preston City Centre will be the focus for regional and sub-regional office development with a secondary focus in Leyland and Chorley Town Centres, with Policies EC2-6 identifying employment and mixed-use allocations that will meet the need for additional office accommodation and provide sufficient quantity, range and choice of sites to meet industrial/warehouse needs throughout the Plan period and help deliver economic growth. Part 5 of the Policy states that the Samlesbury Advanced Engineering and Manufacturing Enterprise Zone will continue to be a regionally significant site for employment. Local Development Order(s) (LDOs) will continue to help deliver the Samlesbury Enterprise Zone. Development likely to compromise its delivery or operation of the Enterprise Zone will not be supported.

## 5. Tests of Soundness

5.1 Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound.

5.2 The tests of soundness are set out in the NPPF, December 2023 (para 35), which states:

*“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:*

- a) **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. ”*

5.3 Logik has fundamental concerns about the soundness of the draft CLLP, which are set out in detail below under the four headings used in the NPPF.

### Positively Prepared

5.4 For a plan to be “positively prepared”, it must be based on a strategy which, as a minimum, seeks to meet objectively assessed development and infrastructure requirements, and is informed by agreements with other authorities.

5.5 Logik considers that the draft Central Lancashire Local Plan has not been positively prepared for the following reasons and so is unsound:

- Prepared on a Flawed Evidence Base that does not adequately assess or meet the area's objectively assessed employment needs;
- Failure to consider Green Belt release; and
- Failure to consider the implications of the National Cyber Force development

## **1. Flawed Evidence Base on Employment Need**

5.6 Logik has appointed Wisher Consulting to undertake a detailed review of the draft Regulation 19 CLLP and its employment land evidence base by the BE Group, including both employment land need and employment land supply.

5.7 The full report is contained within Appendix 3 of this report, with key findings summarised below.

### Employment Land Need

- The latest evidence that underpins the Publication Plan does not appear to provide an impartial and objective assessment of employment land need.
- Employment land need in South Ribble has been reduced, down 25% from 77 hectares in previous Council assessments to 57 hectares in the Publication Plan, due to a last-minute change in methodology. The change in methodology is deeply flawed, is not in response to any change in guidance and is completely at odds with how the Councils' advisors (BE Group) typically approach need assessments.
- It is also noted that the evidence base has a different approach for South Ribble and Chorley but not for Preston. It is simply not defensible to have a Plan with different approaches in different component parts of the plan area with no justification.
- It appears the level of need has been artificially adjusted down to try and avoid any Green Belt considerations in South Ribble.
- The higher level of need of 77 hectares in South Ribble should be reinstated as a minimum, especially given the transformational impact of the new National Cyber Force campus which has yet to be properly accounted for.

### Employment Land Supply

- The assessment of employment land supply in South Ribble is inaccurate and significantly exaggerates the scale of supply in the plan period. There is a substantial shortfall of supply even under the reduced level of 57 hectares of need within the

Regulation 19 draft CLLP. With the proper level of need reinstated, the shortfall is even greater.

- The Publication Plan purports to provide new supply of 61 hectares in South Ribble. 50 hectares of this claimed new supply (or 82%) is in one site - the Cuerden Strategic Site. It is never advisable to be so reliant on one site in a particular area, and exposes the Plan to considerable risk, especially when said site was allocated in the previous Plan and never delivered.
- The claimed 50 hectares of employment land supply at Cuerden is wholly inaccurate:
  - 16 hectares has been sold to the NHS for a new hospital<sup>1</sup>.
  - 4 hectares is required for strategic landscaping and access arrangements as part of the planning permission.
  - Of the remaining 30 hectares, some 20% (6 hectares) is approved for non-employment land uses, such as leisure and retail.
- The real level of employment land supply at the Cuerden Strategic Site is, therefore, circa 24 hectares.
- A further 9 hectares of claimed new supply in South Ribble (15% of the total) is on land north of Lancashire Business Park. The Councils' assessment states very clearly that this land is being held as expansion land for adjacent Leyland Trucks rather than being available in the market, and that there are bridge infrastructure requirements to open up the site.
- If the correct figure of 24 hectares for Cuerden is used and the 9 hectares at Land north of Lancashire Business Park does not come forward then the level of new supply in South Ribble drops significantly from the claimed 61 hectares to 26 hectares.

#### Central Lancashire Local Plan Reg 19 Publication – Review of Employment Land Strategy & Supporting Evidence

- There are also weaknesses in the supply portfolio elsewhere in the Plan. For example, there is a significant reliance on the claimed 63 hectares of new employment land at Policy SS3 - Strategic Site Allocation Preston West. As recently as February 2025, the BE Group classed this site as only a 'maybe' for inclusion in the Publication Plan and stated "although the land sits in a relatively strong location, there are a range of practical issues which would need to be address before an employment allocation could be considered".

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<sup>1</sup> <https://www.uhmb.nhs.uk/news-and-events/latest-news/proposed-sites-confirmed-two-new-hospitals-lancashire>

- The portfolio of new supply needs to be boosted significantly through additional allocations.

5.8 The report by Wisher Consulting is clear that the employment evidence base on which the Regulation 19 draft CLLP is based is deeply flawed and fails to meet the area's objectively assessed employment needs - particularly in South Ribble. Logik, therefore, objects strongly to the figures used in Policy EC1 of the CLLP, which it considers to be unsound. As a minimum, the higher level of employment need of 77 hectares in South Ribble should be reinstated with a full and robust reassessment of supply and the need for Green Belt release and a strategic site at Cuerdale considered.

## **2. Failure to consider Green Belt Sites**

5.9 As set out above, the Wisher Consulting report sets out that the employment evidence base on which the Regulation 19 draft CLLP is based is deeply flawed, with the employment need understated and employment supply overstated.

5.10 As stated earlier in the report, Logik has engaged with SRBC at all relevant stages of the Local Plan process to date to promote its sites for development, including at the Call for Sites stage and most recently detailed representations to the CLLP Preferred Options (Part One) in February 2023, where Logik's sites were within a Preferred Growth Option: Site Profile 26.

5.11 We note that CLA prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA) January 2025 to form part of the evidence base for the CLLP regarding housing and employment land availability. The SHELAA states that it is intended to provide a complete audit of available land by identifying all the sites available for development across Central Lancashire, and to provide information on the range of sites that are available to meet Central Lancashire's housing and economic land requirements.

5.12 It is noted in Section 3: Assessment Review of the SHELAA that it refers to "Parked sites". Paragraph 3.3 states that sites within the SHELAA that are located with the Green Belt (with the exception of previously developed sites in the Green Belt) were 'parked' until a review of land outside of the Green Belt had been undertaken and it had been established if there was sufficient land available outside the Green Belt to meet the identified housing and employment needs.

5.13 There is no further assessment of Logik's sites. Appendix 2 of the SHELAA lists sites discounted following the Preferred Options consultation along with justification, however,

there is no mention of the wider Cuerdale Garden Village (identified as Site Profile 26 in the Preferred Options - Part 1 draft CLLP) or the Logik sites, nor an explanation for their exclusion.

- 5.14 Logik considers that the significant failings of the Employment Land evidence used to support the CLLP have resulted in a failure to properly assess all potential employment sites, resulting in sites previously identified at the Preferred Options - Part 1 stage being wrongly 'parked', and no strategic assessment of Green Belt review undertaken based on a flawed evidence base. The downward revision of the employment land requirement in the evidence base, reducing the need from 77 hectares to just 57 hectares in South Ribble, have been driven by unorthodox changes to the calculation methodology that distort the true demand. The inflated supply figures further obscure the real land shortage, making it appear that no Green Belt land is necessary, even though there is a clear shortfall. A full and robust reassessment of employment land and a full Green Belt Assessment are therefore required in order to make the plan sound.
- 5.15 Logik strongly considers that the CLLP has not been positively prepared as it does not seek to meet the area's objectively assessed needs, nor properly consider the requirements of all available sites. The current approach fails to account for the true scale of employment demand and the need for realistic land supply, potentially sidelining vital economic opportunities for the sake of avoiding a Green Belt review. Logik, therefore, objects strongly to strategic policies SS2 and EC1 and of the draft CLLP, which it considers are unsound.

### **3. Failure to consider the National Cyber Force (NCF) development**

- 5.16 It is clear that the Regulation 19 draft CLLP does not consider the implications of the new NCF development being constructed in Salmesbury and due to open in 2025, therefore, failing to take account of this within the area's objectively assessed employment needs.

- 5.17 The only mention in the document of the NCF is within Paragraph 5.11 that states:

*"In 2021, the Government announced that Salmesbury will be the home of the National Cyber Force, a partnership between the MoD and GCHQ. The Councils understand that the intention is to build on the cyber sector already existing in Manchester and bring high-skilled and well-paid jobs to the area. The Councils are working with Lancashire County Council to understand the opportunity this establishment will create, the timescale and how it might affect the wider economy."*

- 5.18 The Central Lancashire Employment Land Study, Land Supply and OAN Update 2024, is also clear that the three models used to assess employment land needs: Historic Land Take-Up,

Labour Demand, Labour Supply are 'Policy Off', meaning they do not account for potential job growth from major public sector initiatives. Paragraph 3.8 of that report confirms that 2017 and 2019 Central Lancashire ELS included 'Policy On' scenarios factoring in Samlesbury Enterprise Zone and City Deal, but the 2024 report considers these estimates to now be outdated. Paragraph 3.8 makes reference to the NCF at Samlesbury as a "key strategic project" but that there are currently no clear jobs forecast to inform a 'Policy On' scenario.

5.19 Logik considers that the CLLP is unsound as it does not properly assess or plan for the NCF at Salmesbury as a major public sector initiative in a 'Policy On' growth scenario.

5.20 Logik is also surprised and disappointed that the CLA has failed to acknowledge and recognise the transformative economic opportunity for Central Lancashire presented by the NCF - particularly given its was actively encouraged by South Ribble Borough Council, announced as far back as October 2021, and is openly talked about and referred to by other public bodies. Indeed, the NCF is referred to five times in the December 2022 Preferred Options - Part 1 draft CLLP, including the following:

- Policy Direction 2: Spatial Approach - *"Consider identifying a strategic area of growth linked to the Enterprise Zone and National Cyber Force at Samlesbury; further consider the role of Safeguarded Land and the Samlesbury/Cuerdale Growth Option; and Minimise harm to the Green Belt except in South Ribble in the event where there is justification for a garden village or new settlement."*
- Spatial Strategy (page 32) - *"The BAE Systems strategic site is also to be the focus of delivery for the National Cyber Force, a government backed initiative. This development is likely to provide around 5000 jobs during the plan period and will take up the remaining land in this location once completed."*
- Spatial Strategy (page 36) - *"The Central Lancashire authorities consider that it is important to start exploring potential options for accommodating growth in the next Local Plan period but also taking advantage of opportunities presented for this emerging plan period. There is the potential for an area of growth based around the A59 leading from Junction 31 of the M6 to the Enterprise Zone and National Cyber Force at Samlesbury. The Government has recently confirmed the delivery of a Cyber Hub North in this locality. There is the potential for this locality to provide sector leading economic growth opportunities and creating new associated communities. This opportunity could not only contribute beyond this plan period but also has the ability to come forward sooner if justified and needed."*

- 5.21 It is unclear why the Regulation 19 draft CLLP is now largely silent on the NCF – taking a “Policy Off” approach – particularly given the spatial strategy identified in the Preferred Options – Part 1 draft CLLP and the work undertaken by other public bodies to take advantage of and quantify this once in a lifetime opportunity for the CLA.
- 5.22 The NCF is a joint Ministry of Defence (MoD) and GCHQ partnership aimed at countering cyber threats from hostile states, terrorists, and criminals. Internally referred to as “GCHQ 2,” the scale of this project is expected to be immense, bringing thousands of high-value jobs and fostering a significant clustering of cyber-related businesses.
- 5.23 The opportunity presented by the NCF has already been recognised by other public bodies in the area, including the creation of the Lancashire Cyber Partnership that will see the NCF collaborate with Lancashire County Council, the Lancashire Enterprise Partnership, the University of Central Lancashire, Lancaster University, and BAE Systems.<sup>2</sup>
- 5.24 The Preston Partnership (funded by Lancashire County Council), also commissioned a report by Plexal<sup>3</sup> in August 2024 to provide insight towards how the innovation ecosystem in Preston (one of the CLAs) can be nurtured and grown to capitalise on an unparalleled innovation investment in the county such as the NCF, which was supported by input from stakeholders at 22 different organisations.
- 5.25 In addition, a recent report to Lancashire County Council’s Cabinet on 6 January 2025 approved the allocation of £6m of devolution funding toward a new Innovation Hub facility at the Salmesbury Enterprise Zone. As part of the Cabinet Report<sup>4</sup> it clearly sets out the opportunity created by the NCF, its timescales, and how it might affect the wider economy:

*“The future presence of the National Cyber Force in Lancashire creates a once in a generation opportunity to accelerate economic growth and regeneration. This move is forecast to generate up to 3,000 jobs in the County, as well as causing transformational economic uplift through increased contracts, relocation of leading organisations, and demand for the necessary skills that enable these operations.*

*As evidenced in a recently commissioned economic impact study, the total £5bn National Cyber Force investment over the next decade could leverage a further 1,500 indirect jobs, with salaries in the associated occupations being almost twice the current Lancashire average. A*

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<sup>2</sup> <https://www.gov.uk/government/news/new-partnership-for-cyber-collaboration>

<sup>3</sup> <https://www.prestonpartnership.org/wp-content/uploads/2024/08/Plexal-IS-Preston-Partnership-Innovation-in-Preston-v2.pdf>

<sup>4</sup> <https://council.lancashire.gov.uk/documents/s247727/Report.pdf>

*wider impact, which matches these new digital and cyber activities with the traditional strengths of the county's industrial base, has the potential to further transform and modernise Lancashire's local economy.*

*The Lancashire Devolution Deal outlines Lancashire's commitment to deliver innovation-led growth across Lancashire. This includes realising the impact of the National Cyber Force and capturing the investment, business, research and skills expansion of new developments, creating opportunities and new careers for local residents."*

- 5.26 The current draft CLLP fundamentally fails to take account of the publicly available information around the NCF, the clear knowledge and information available through Lancashire County Council, and in particular in relation to employment site allocations that could support its growth. By neglecting to apply a 'Policy On' position at this stage in order to rush to meet the NPPF transitional arrangements, the CLA has failed to take account of this transformative public sector initiative within the area's objectively assessed employment needs and is, therefore, unsound. This also undermines the engagement with Lancashire County Council.
- 5.27 In this context, it is also important to highlight the Government's Guidance Note on Plan-Making<sup>5</sup>, which sets out clear expectations for how strategic policy-making authorities must gather evidence and engage with relevant bodies when planning for defence, national security, and resilience. The guidance specifically states that local authorities should, where appropriate, work with the MoD's Defence Infrastructure Organisation to ensure they have and take into account the most up-to-date information about defence and security needs in their area. Despite the well-documented and publicly known plans for the NCF to establish its new headquarters at Samlesbury in 2025, which are referenced in paragraph 5.11 of the draft CLLP and acknowledged in the Statement of Common Ground with Lancashire County Council, there is no clear evidence that the MoD, the NCF, or other public bodies associated with the delivery of the NCF have been consulted in the plan's preparation. Given the nationally significant scale and strategic implications of the NCF's arrival in Samlesbury, and the clear guidance requiring cooperation with defence and security bodies, the absence of evidence demonstrating such engagement is concerning.
- 5.28 Logik notes that within the submitted Statement of Common Ground between the Central Lancashire Authorities and Lancashire County Council (LCC) it states:

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<sup>5</sup> <https://www.gov.uk/guidance/plan-making>

*“LCC considers that in addition to meeting the total need in numerical terms there is a need to provide sites of the right kind in the right place including those which are suitable for supporting specialised sector growth and innovation in the medium to longer term” (para 5.16); and.*

*“The Central Lancashire area hosts significant sector strengths which have the potential to grow and develop new, nationally significant high-value capabilities in digital, cyber, technology, knowledge-based industries and advanced engineering and manufacturing. In order to realise these opportunities, site allocation and assembly is critical in providing a strategic pipeline to respond to demand”. (para 5.13).*

5.29 It is clear that the opportunities presented by the NCF, and the implications on employment need, have not been considered by the CLA. Logik does not agree that this issue should be deferred to a later review of the CLLP and must be addressed in this version of the plan given the publicly available information and the impact on the proper plan-making process. On this basis, Logik objects strongly to strategic policies SS2 and EC1 and of the draft CLLP, which it considers are unsound.

## **Justified**

5.30 The NPPF states that for a plan to be “justified”, it must be an appropriate strategy when considered against the reasonable alternatives, and must be based on proportionate evidence.

5.31 Logik considers that the draft CLLP is not justified, and therefore, unsound for the following reason:

- Failure to Consider Green Belt Sites due to Flawed Evidence.
- Failure to Consider the NCF.

5.32 The detailed rationale for the above is provided earlier in the Section of the report. Logik considers that this clearly demonstrates that reasonable alternatives have not been considered, with the current plan based on flawed evidence on employment need and the availability of employment sites.

## **Effective**

5.33 The NPPF states that for a plan to be “effective”, it must be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

5.34 Logik considers that the draft Central Lancashire Local Plan is not effective and is unsound for the following reasons:

- Failure to adequately account for the deliverability of Employment Land.
- Deferring of strategic matters.

## **1. Deliverability of Employment Land**

5.35 The enclosed report by Wisser Consulting sets out Logik's position that the assessment of employment land used to inform the draft CLLP contains errors, inconsistencies, and weaknesses, leading to an overall shortfall in provision, even based on the reduced employment land need.

5.36 In South Ribble, the Plan claims a supply of 61.3 hectares, but 82% of this is attributed to the Cuerden Strategic Site, a risky overreliance given its previous failure to be delivered. Additionally, the claimed supply at Cuerden is overstated, as 16 hectares have been sold to the NHS for a new hospital, 4 hectares are required for landscaping and access, and a further 6 hectares are earmarked for non-employment uses, leaving only 24 hectares of actual employment land. Another 9.2 hectares at the Lancashire Business Park is unlikely to be available to the open market as it is expected to be retained for Leyland Trucks' expansion. Adjusting for these factors reduces the actual employment land supply in South Ribble to 26 hectares - only 45% of the Councils' assessed need and just 34% of the minimum 77 hectares recommended in the Wisser Consulting review.

5.37 Beyond South Ribble, the Plan relies heavily on the Preston West Strategic Site, which is supposed to provide 63 hectares of employment land. However, the BE Group's February 2025 report rated this site as only a 'maybe' due to constraints, availability concerns, and its likelihood of being housing-led rather than employment-focused.

5.38 Given the above, Logik considers that the strategic employment policies in the draft CLLP (principally draft Policy EC1) are unsound as it has not been evidenced how they can be delivered in the plan period. This is notwithstanding Logik's other concerns about the failure to consider the NCF and its implications on strategic allocations and employment need.

## **2. Deferral of strategic matters nor agreement with Lancashire County Council**

5.39 The NPPF states that for a Local Plan to be sound it must provide a strategy which is informed by "agreements with other authorities", so that unmet need from neighbouring areas is

accommodated where it is practical to do so and is consistent with achieving sustainable development.

- 5.40 In this regard, Logik notes the following in paragraphs 5.16 – 5.18 of the Statement of Common Ground Between the CLA and Lancashire County Council (January 2025) that has informed the draft CLLP, which relates to Strategic Matter 3: Economic Development (*our emphasis in **bold***):

*“LCC considers that in addition to meeting the total need in numerical terms there is a need to provide sites **of the right kind in the right place including those which are suitable for supporting specialised sector growth and innovation in the medium to longer term** (paragraph 5.16).”*

*“LCC believes that the Enterprise Zone in Salmesbury is likely **to reach capacity early in the plan period** and suggest that they are aware of **significant demand from specialised businesses looking to co-locate with existing businesses in the area**. Through the Preferred Options consultation and later Duty to Cooperate meetings, LCC requested the CLAs maintain existing strategic allocations and **consider the allocation of new strategic employment sites** and to take into account the lead in time for preparing new strategic sites for development. The CLAs considered this, however, were of the view it is not required at this stage given the **available supply of employment land** and the principles of the Spatial Strategy and Strategic Objective 2 to support growth in the existing main urban areas to regenerate the City and Town centres and make the best use of existing land (paragraph 5.17).”*

*“The CLAs and LCC are currently working on **further evidence** relating to strategic and specialised need. This will then inform the position on potentially managing need through monitoring, and if necessary, through **review earlier than the normal 5-year cycle** (paragraph 5.19).”*

- 5.41 It is clear from the above that LCC considers additional strategic employment sites are required in close proximity to the Salmesbury Enterprise Zone, which it considers will reach capacity in the early plan period. This is also, seemingly, not having regard to the NCF. The CLAs have rejected this assertion based on its evidence base, which Logik considers to be deeply flawed. It should also be noted that the Enterprise Zone is restricted to advance manufacturing and research uses only so, regardless of capacity, it would not be able to accommodate any other supply chain employment uses that need to be located close to those industries.

- 5.42 Government Guidance on Plan-Making<sup>6</sup> is clear that strategic policy-making authorities should explore all available options for addressing strategic matters within their own planning area, unless they can demonstrate to do so would contradict policies set out in the National Planning Policy Framework. If there they are unable to do so they should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their plans for examination. It also states that Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, **and not deferred them to subsequent plan updates or are not relying on the inspector to direct them** (our emphasis in **bold**).
- 5.43 From the evidence provided in the Statement of Common Ground between the CLA and LCC, and the deferral of consideration of the NCF in paragraph 5.11 of the CLLP, Logik considers it clear that cross-boundary strategic matters relating to employment need and the location of strategic employment allocations have not been agreed and sufficiently dealt, with in particular the consideration of the NCF and capacity of the Salmesbury Enterprise Zone being deferred to a future Local Plan review despite robust and plentiful evidence being available now. Logik considers this approach to be unsound, and strongly objects to strategic policies SS2 and EC1.
- 5.44 In addition, Logik considers that the CLA's apparent rush to progress the draft CLLP under the transitional arrangements contained within the December 2024 NPPF to avoid new housing targets has actually removed its ability to properly plan for employment growth by restricting its ability to have full consideration of the contents of the new NPPF, including the potential for strategic delivery of employment on Grey Belt sites. In light of the flawed evidence base and the failure to consider Green Belt release, this potential deferral of a key strategic issue raises further questions around the soundness of the draft CLLP.

## Consistent with National Policy

- 5.45 The NPPF states that for a plan to be consistent with National Policy, it must enable the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 5.46 Logik considers that the draft Central Lancashire Local Plan is not consistent with National Policy and is unsound for the following reasons:

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<sup>6</sup> <https://www.gov.uk/guidance/plan-making>

- Inconsistency with the overarching economic objective set out in Paragraph 8 of the NPPF (December 2023).
- Inconsistency with the requirements of Paragraph 16 to being prepared positively and shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; and
- Inconsistency with the requirements of Paragraph 22 to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

## **1. Inconsistency with Paragraph 8**

5.47 Paragraph 8 of the NPPF (December 2023) states that:

*“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*

5.48 For the reasons set out earlier in this Section, Logik is of the strong opinion that the draft CLLP in its current form does not accord with paragraph 8 of the NPPF in so much as it fails to ensure that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

5.49 It has been demonstrated in these representations that assumptions and strategic policies on employment growth, strategic site allocations, and the approach to Green Belt review are based on deeply flawed employment land evidence that fails to allocate sufficient sites in the right location to take account of demand, as well as concerns raised by LCC around responding to capacity issues with the Salmesbury Enterprise Zone and the NCF. The draft CLLP is, therefore, considered unsound and will not support the requirements for employment growth, innovation and improved productivity in line with the NPPF objectives for sustainably development.

## **2. Inconsistency with Paragraph 16**

5.50 NPPF Paragraph 16 states that Plans should:

*a) be prepared with the objective of contributing to the achievement of sustainable development;*

*b) be prepared positively, in a way that is aspirational but deliverable;*

*c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.*

5.51 As set out in paragraphs 6.47 - 6.49 above, Logik is of the strong opinion that the draft CLLP in its current form does not accord with the objective of contributing to the achievement of sustainable development as required by Paragraph 8 of the NPPF in so much as it fails to ensure that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

5.52 Logik has also set out earlier in this Chapter that the draft CLLP has not been prepared positively, nor is deliverable as it is prepared on a flawed evidence base that does not meet the area's objectively assessed employment needs; failures to consider strategic Green Belt release; and failures to consider the implications and requirements of the NCF development.

5.53 Logik also strongly considers that the Regulation 19 draft CLLP has not been shaped by early, proportionate and effective engagement. There was no engagement with communities, local organisations, businesses on the draft CLLP in the two years between the publication of the Preferred Options - Part 1 draft in December 2022 and the Regulation 19 draft in February 2025, indeed with the CLA opting in this time to discard the proposed Preferred Options - Part 2 consultation and fundamentally change its approach to delivering its strategic vision but scraping the proposed Green Belt assessment and preferred Growth Areas. Notwithstanding Logik's concerns about the CLAs duty to cooperate and deeply flawed evidence base, the lack of engagement has meant the Regulation 19 draft CLLP is considered to be unsound and fails to deliver on the requirements for sustainable employment growth.

5.54 In addition to this, there is no evidence available within the Regulation 19 submission to show that Logik's sites or previous representations were even considered in formulating the draft CLLP.

### **3. Inconsistency with Paragraph 22**

- 5.55 Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 5.56 Logik has set out earlier in this Chapter that the draft CLLP failures to consider the NCF development - a major opportunity and public sector investment in the area which, according to Lancashire County Council, represents a once in a generation opportunity to accelerate economic growth and regeneration. This move is forecast to generate up to 3,000 jobs in the County, as well as causing transformational economic uplift through increased contracts, relocation of leading organisations, and demand for the necessary skills that enable these operations.
- 5.57 Logik considers that the failure to account for the NCP, which is due to open in 2025, is inconsistent with Paragraph 22 of the NPPF.

## **Conclusion**

- 5.58 Logik has fundamental concerns about the soundness of the draft CLLP, against all of the relevant tests set out in the NPPF. These principally relate to the following:
- Reliance on a Flawed Evidence Base that does not correctly identify the area's objectively assessed employment needs;
  - Failure to consider Green Belt release based on flawed evidence base;
  - Failure to consider the National Cyber Force development;
  - Failure to adequately account for the deliverability of Employment Land;
  - Deferring strategic matters to a later plan period; and
  - Inconsistency with the overarching economic objective for sustainable growth as set out in the NPPF.
- 5.59 Fundamental to Logik's concerns about the soundness of the draft CLLP are the findings of a detailed report by Wisher Consulting that has reviewed the employment land evidence base by the BE Group, including both employment land need and employment land supply. Logik strongly considers that the CLLP does not seek to meet the area's objectively assessed employment needs, nor properly consider the requirements of all available sites. The current approach fails to account for the true scale of employment demand and the need for realistic

land supply, both now and including the NCF, potentially sidelining vital economic opportunities for the sake of avoiding a Green Belt review. It therefore concludes that the draft CLLP does not meet the tests of soundness set out in the NPP and, in particular, Logik objects strongly to strategic policies SS2 and EC1 and considers a new strategic site allocation should be reconsidered at Cuerdale.

## 6. The Case for a Strategic Site Allocation at Cuerdale

- 6.1 Chapters 5 and 6 of these representations set out Logik’s case for why the Regulation 19 draft CLLP is unsound.
- 6.2 The purpose of this Chapter is to set out the strategic case for the CLLP to include for a new Strategic Site Allocation at Cuerdale, to at least include Logik’s land interests as set out at Appendix 1. This includes the three parcels of land currently subject to Logik’s outline planning application, as well as additional adjacent land it has an interest.
- 6.3 Logik strongly considers that a new Strategic Site Allocation should be included in the CLLP to address the shortcomings and questions of soundness contained in these representations. Logik considers that the starting point for considering the extent of the new Strategic Site Allocation should be the Cuerdale Garden Village Site Profile (Site Profile 26) previously considered by the CLA at the Preferred Options – Part 1 stage (included for ease of reference at Appendix 4). Logik also considers that there is a strong case for the inclusion of its additional land interests around Cuerdale to meet, and indeed, future-proof the proposed employment-led Strategic Site Allocation in light of the deeply flawed current employment land evidence base and the lack of consideration of the NCF at Salmesbury.
- 6.4 Appendix 5 of these representations includes a revised version of the Cuerdale Garden Village Site Profile (Site Profile 26) previously considered by the CLA at the Preferred Options – Part 1 stage, which also includes in red the additional land interests of Logik that it considers should be added. It is the total extent of the land highlighted in Appendix 5 that is referred to as the proposed “Strategic Site” within this chapter of the report, as well as in the proposed modifications section in Chapter 7.

### The Strategic Case for Sustainable Development at Cuerdale

- 6.5 The concept of an growth area for sustainable development at Cuerdale is not new. The CLA has previously identified this within its Preferred Options – Part 1 draft CLLP in December 2022, stating:

*‘There is the potential for an area of growth based around the A59 leading from Junction 31 of the M6 to the Enterprise Zone and National Cyber Force at Salmesbury. There is potential for this locality to provide sector leading economic growth opportunities and creating new associated communities.’*

- 6.6 The proposed Preferred Growth Area was fully assessed at that time and deemed to be suitable, available and achievable, although has not be taken forward in the Regulation 19 draft CLLP.
- 6.7 The area around Cuerdale and Salmesbury (including the Logik sites) represents a strategic growth area being promoted by government and public bodies, which has the future potential to provide transformational opportunities for the area and wider economy.
- 6.8 No other site in Central Lancashire possesses the locational attributes of the opportunity presented at Cuerdale and Salmesbury. Central to this is the combination of its location adjacent to the Salmesbury Enterprise Zone, containing a critical mass of existing employment and planned future, high value employment uses; the adjacency of the planned National Cyber Force campus - a truly transformational project which will have a significant impact on the local economy through the creation of specialised and high value employment; and the site's situation on the M6 motorway and directly accessible to both Preston and Blackburn as key economic and population centres in the context of the county.
- 6.9 It is these locational attributes which reveal and shape the opportunity being proposed by Logik (and others), and more widely in Cuerdale. Realising the potential of this critical economic location requires employment space, providing the infrastructure needed to enable future investments in the area to realise their full effect. These representations set out Logik's view that the employment evidence used in the Regulation 19 draft CLLP is deeply flawed and that there is actually a pressing and evidenced market need for more business space with strategic access to the M6, whilst the National Cyber Force campus presents an opportunity for Central Lancashire to capture investment from businesses that have an inherent interest in locating close by in providing supply chain services and activities, creating a cluster of complementary businesses in the area. This has been recognised publicly by both Lancashire County Council and the Preston Partnership, but seemingly ignored by the CLA.
- 6.10 This strategic site also lies within the centre of Lancashire's 'Arc of Prosperity'; a corridor which contains most of the county's largest urban areas generating around 75%<sup>7</sup> of Lancashire's wealth and providing the primary focus of the Lancashire Enterprise Partnership's economic and housing growth plan.

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<sup>7</sup> The Lancashire Skills and Employment Strategic Framework 2016-2021

- 6.11 The Arc clearly signals where the new jobs and growth in Lancashire will be generated, supported by key economic and transport interventions. More than 90%<sup>8</sup> of the county's employment land allocations will be located on sites, and at locations, within the Arc.
- 6.12 This strategic site is located close to the M6 meaning it is well-connected to destinations across the north-west and is suited to deliver social and economic benefits that enable South Ribble to take full economic advantage of its position within Lancashire. The A59 and A677 corridors function as strategic routes to the Ribble Valley and East Lancashire (including Blackburn and Burnley) respectively.
- 6.13 This proposed strategic site is also located adjacent to the SEZ, which incorporates 50 hectares of land at the former Samlesbury Aerodrome, as well as the active BAE Systems complex, one of the world's most advanced, technology-led defence, aerospace and security solutions companies, and is one of four Enterprise Zones in Lancashire. Located in the heart of the largest cluster of aerospace production in the UK which employs 13,000 people<sup>9</sup>, Samlesbury is a national centre for excellence for advanced engineering and manufacturing companies.
- 6.14 The SEZ benefits from a Local Development Order (LDO) which permits the development of advanced manufacturing and research (specifically relating to aerospace, aviation, motoring, computing, nuclear, flexible materials and renewables) uses without the need for planning permission, and has resulted in a number of different developments by BAE Systems (one now operated by Wincanton), alongside Sheffield University. The developments include logistics warehousing, a training facility and an advanced manufacturing research centre. Lancashire County Council has, however, expressed concern in its submitted Statement of Common Ground with the CLA that the SEZ will reach capacity early in the plan period.
- 6.15 A strategic site at Cuerdale offers the SEZ, NCF and BAE Systems, in particular, the opportunity to create a strong local supply chain and to facilitate the movement and storage of materials/ goods required to support the ongoing operations at the complex.
- 6.16 The National Cyber Force was announced by the Prime Minister as part of the Integrated Review in November 2020. The joint Ministry of Defence and Government Communications Headquarters partnership is helping keep the country safe as the new home of offensive cyber operations.

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<sup>8</sup> The Lancashire Skills and Employment Strategic Framework 2016-2021

<sup>9</sup> <https://investinlancashire.com/enterprise-zones/samlesbury-aerospace-enterprise-zone/>

6.17 The permanent site of the NCF will be established in Samesbury, cementing the North-West region's position as the cyber centre of the UK. The significance of this development is underlined by the direct reference to this investment in the Levelling Up White Paper where it is confirmed that it 'will boost the local economy and create jobs'<sup>10</sup>. Indeed, in a recent Cabinet Paper in January 2025, Lancashire County Council has described the NCF as a once in a generation £5bn investment, which is forecast to generate up to 3,000 jobs in the county and leverage a further 1,500 indirect jobs, and a commitment in the Lancashire Devolution Deal to realising the impact of the National Cyber Force and capturing the investment, business, research and skills expansion of new developments, creating opportunities and new careers for local residents. Logik considers this cannot be delivered without a strategic site allocation in Cuerdale.

## The Case for Removal from the Green Belt

6.18 Logik acknowledges that any Strategic Site Allocation in Cuerdale will require land to be removed from the Lancashire Green Belt, which was drawn up in the late 1970s/ early 1980s and surrounds settlements including Preston, Blackburn and Chorley with limited material change to its boundary since this time.

6.19 Again, the concept of removing land from the Green Belt in Cuerdale is not a new one, with the Draft Policy Direction 2 (Spatial Approach) of the Preferred Options - Part 1 draft CLLP in December 2022 setting out that the Plan will (inter alia):

*"Minimise harm to the Green Belt except in South Ribble in the event where there is justification for a garden village or new settlement; and,*

*Consider identifying a strategic area of growth linked to the Enterprise Zone and National Cyber Force at Samesbury."*

6.20 The Preferred Options - Part 1 draft CLLP indeed considered a strategic site around Cuerdale within "Parcel P14" of the Green Belt Designations Study (2022, prepared by LUC). The ratings for the parcel's strategic contribution to the Green Belt purposes are shown below (extract from Table 4.1 of the green belt designations study), demonstrating that the only contribution that Parcel P14 makes to the Green Belt is in regard to Purpose 3 - to assist in safeguarding the countryside from encroachment.

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<sup>10</sup> Levelling Up the United Kingdom White Paper (2022)

Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Highest Contribution
P14	Limited/no	Limited/no	Significant	Limited/no	N/A	1 Significant

6.21 For the reasons discussed elsewhere in these representations, Logik considers that the fundamental shift in the strategic vision contained within the Regulation 19 draft CLLP – and the lack of consideration of Green Belt sites – is based on deeply flawed evidence, as well as a failure to consider the NCF.

6.22 The NPPF (December 2023) and Government’s growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase employment and housing land supply, support growth and boost home ownership. It is considered that proposed Strategic Site is available, suitable and achievable and is ideally positioned to deliver an employment-led mix of uses.

6.23 In accordance with the NPPF, to be considered deliverable, sites should:

- Be Available Now: A site is considered available where there is confidence that there are no legal or ownership problems;
- Be Suitable: A site is considered suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and
- Be Achievable: A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site within five years. This is a judgement about the economic viability of a site and the capacity of the developer to compete and sell housing over a certain period considering market factors, cost factors and delivery factors.

6.24 An assessment of Logik’s proposed Strategic Site Allocation at Cuerdale is set out below:

**An Available Site**

6.25 The land does not have any ownership or legal impediments, and Logik remains committed to bringing the site forward for development, as can be demonstrated by its continued discussions with South Ribble Council on the outline planning application. As such the site would be available to be developed early in the plan period.

## **A Suitable Site**

- 6.26 The proposed strategic site is considered to be in a sustainable location as set out above.
- 6.27 Our assessment of the site against the five purposes of the Green Belt (as cited at Paragraph 143 of the NPPF) is set out below:

### **Purpose A: To check the unrestricted sprawl of large built-up areas**

- 6.28 When determining whether a development would constitute 'urban sprawl', the starting point is a consideration of the Site's proximity to the commonly accepted urban limits of a substantial population centre. This determines whether the proposal could reasonably be classed as a form of sprawl.
- 6.29 The closest 'large built up area' to the proposed Strategic Site is Preston to the west, which at its closest point defined by the extent of the city's suburbs is approximately 2.5km away and located on the opposite side of the M6 motorway and River Ribble, providing a defensible physical boundary between the Sites and Preston. The proposed Strategic Site is also being brought forward in the wider context of the existing development at the Samlesbury Enterprise Zone, established employment sites such as BAE Systems, and the proposed NCF campus.
- 6.30 It is evident that the proposed Strategic Site is not a form of sprawl, as it will be a new strategic employment development and it is not the expansion of an existing 'large built up area'. A sprawling effect would occur if the proposed Strategic Site was to merge with existing large built-up areas, from which it is separated by significant road infrastructure and natural features. These act as a physical barrier to the outward sprawl of the proposed Strategic Site towards Preston in a westerly direction. The easterly expansion of Preston towards the proposed Strategic Site is limited due to the River Ribble and associated flood plain. This will mean a substantial green gap, and separation between the settlements, will be maintained.
- 6.31 To the east, the proposed Strategic Site is separated from the settlement of Blackburn by some c. 4km at its nearest point. This is a substantial gap and in this context the development will clearly not be seen as an expansion (sprawl) of Blackburn. It is separated from Blackburn by road infrastructure, areas of woodland and the SEZ. These features act as a physical barrier between the expansion of the proposed Strategic Site, or Blackburn towards each other.

6.32 Taking the above factors into consideration, it is evident that the proposed Strategic Site would not lead to unrestricted sprawl of a large built-up area and therefore makes no contribution to the Green Belt in respect of Purpose A.

**Purpose B: To prevent neighbouring towns merging into one another**

6.33 Similarly to Purpose A, the main consideration in this case is the proximity of the proposed Strategic Site to neighbouring towns, and to what degree the existing gap between the respective towns would be reduced as a result of the development. It is evident in this context that the Proposed Development will not result in the merger of any towns.

6.34 The largest settlement close to the Sites is Preston (pop. 147,900)<sup>11</sup>, c.2.5km due west. To the north the closest settlement which could be considered to be town is Longridge at c.5.5km. To the south-east the closest town is Blackburn (pop. 154,739)<sup>12</sup> at c.4km. To the south-west the closest town is Bamber Bridge at c.4km.

6.35 While the previous subsection concludes that the scheme would not result in the unrestricted sprawl of Preston, the proposed Strategic Site in isolation, or as part of any emerging Cuerdale Garden Village proposals, would add to one of a number of settlements which lie on the periphery of Preston. The proposed Strategic Site would subsume the existing InBev Samlesbury Brewery which is considered to be a positive intervention with respect to its positioning within the Green Belt. However, these are not 'towns' in respect of Purpose B and their merger in this sense does not constitute a Green Belt consideration.

6.36 The gap between Preston and Blackburn, within which the proposed Strategic Site is located within, is a strategic gap given the size of the settlements relative to the area of Green Belt which separates them. The proposed Strategic Site, incorporating the brewery and former aerodrome, would result in a new settlement sat centrally within the wider expanse of and surrounded by retained Green Belt on all sides and therefore maintaining a significant gap between Preston and Blackburn.

6.37 The proposed Strategic Site span a greater distance east to west than north to south. Considering the size of the settlements of Longridge and Bamber Bridge and separation by notable features including the M6 Motorway and River Ribble the land makes no significant contribution with respect to Purpose B.

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<sup>11</sup> 2021 UK Census data

<sup>12</sup> 2021 UK Census data

6.38 The green gaps which would remain between the proposed Strategic Site and Blackburn to the east and Preston to the west ensure that there would be no actual or sense of merger of Blackburn and Preston resulting from the proposed development. These gaps accommodate a number of physical barriers which serve to limit the extent to which any residual gap could be closed in the future and so ensure the individuality of Preston and Blackburn.

**Purpose C: To assist in safeguarding the countryside from encroachment**

6.39 In order to assess the impacts of the proposed Strategic Site on the countryside, the quality of the Sites should be considered in relation to its current use as undeveloped and open rural land. Landscape character is a key consideration alongside the extent to which the Site and its surroundings contribute to the qualities expected of the countryside.

Land Quality

6.40 The soilscape of the proposed Strategic Site is defined as comprising slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils<sup>13</sup>. The soils are of moderate natural fertility and are described as being “mostly suited to grass production for dairying or beef; some cereal production often for feed”.

6.41 In terms of the existing land use, the proposed Strategic Site comprises predominantly of agricultural land. The proposed Strategic Site have not been classified under the Post 1988 Agricultural Land Classification (ALC). However, an area of land located c.1km north-west of proposed Strategic Site has been classified as a mix of Grade 2, 3a, 3b and 4. DEFRA’s Magic Map application shows that under the Pre 1988 ALC, parts of the Site are divided between Grade 3 and 4.

6.42 The best, most versatile (BMV) agricultural land includes Grades 1 to 3a. It is likely that the proposed Strategic Site would not result in the loss of 20ha or more BMV, so can be concluded that significant effects on soils and agricultural land would not occur.

Landscape and Visual Impact

6.43 As demonstrated within the Landscape and Visual Impact Assessment (LVIA) which forms part of Logik’s outline planning application, the proposed Strategic Site is considered to be of low to medium value in terms of landscape visual quality. The Green Belt designation is considered to be of medium value, medium susceptibility and therefore medium sensitivity.

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<sup>13</sup> Cranfield University (2022) Soilscales. Available at: <http://www.landis.org.uk/soilscales/>

There are other areas within the Lancashire Green Belt of higher landscape value and more rural in nature than the sites which are bisected and bounded by major roads.

*The extent to which the site displays qualities of the countryside*

6.44 It should be noted that the proposed Strategic Site, whilst predominantly agricultural in character, is affected by a number of urban infrastructure influences which affect the sense of a countryside setting. These include major employment uses to the east of the sites and the M6 motorway, particularly Junction 31, to the west. These are visible and audible influences on the Sites. This context reduces the proposed Strategic Site's harm against Purpose C when drawing on guidance from the Planning Advisory Service on this matter. In respect of Purpose C, this states:

*'The most useful approach is to look at the difference between urban fringe - land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.'*<sup>14</sup>

6.45 In assessing any potential considerations caused by the removing the proposed Strategic Site from the Green Belt, taking the quality of the countryside in this location into account and the size and nature of the proposed Strategic Site, it is realistic to conclude that it makes up to a moderate contribution at most.

**Purpose D: To preserve the setting and special character of historic towns**

6.46 The proposed Strategic Site does not contain nor is it located within the setting of any historic town. In assessing the impacts of a given development proposal on the setting and special character of an historic town, consideration should be given to intervisibility of the affected town(s) from within and beyond the Site, whether the land constitutes a historic landscape relating to the town and whether any statutorily designated heritage assets are affected.

6.47 There is no statutory definition of a 'historic town', however by virtue of the word 'town' this excludes smaller settlements such as villages and hamlets and larger settlements, namely cities.

6.48 The proposed Strategic Site is located over 2km from the closest Conservation Area within Walton-le-Dale which is separated by the M6 motorway, River Ribble and intervening modern development. It is considered that Walton-le-Dale akin to a large village, however in any event

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<sup>14</sup> Planning on the Doorstep: The Big Issues – Green Belt (Page 6) (Local Government Association and Planning Advisory Service 2015)

is unlikely to be impacted on by the removal of land from the Green Belt given it does not form an important setting to the settlement.

6.49 Other settlements within the vicinity such as Higher Walton, Houghton and Mellor are deemed too small to constitute a town and primarily comprise post-war development. The larger settlements of Preston and Blackburn are both major urban areas which similarly have expanded in relatively recent times. They are not considered to constitute historic towns in so far as Purpose D is concerned given the lack of a historic relationship between the towns and the Proposed Development Sites.

6.50 It is therefore considered that the contribution of the proposed Strategic Site would be negligible against purpose D of the Green Belt.

**Purpose E: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

6.51 The protective nature of Green Belt policy is partly so that development and investment is directed towards urban areas. To assess whether a proposed development would harm purpose E, will depend on the extent to which it would otherwise discourage this pattern of growth. This itself must be seen in the context of the overall development need to which a proposal is responding, the ability to meet this need without utilising land within the Green Belt and whether the development proposed could reasonably be delivered on non-Green Belt land.

6.52 This Chapter has already set out the strategic context for a proposed Strategic Site and the extent to which the development has a fixed locational requirement, in the wider context of the Samlesbury Enterprise Zone, BAE Systems, and the new NCF campus at Samlesbury. Taking all of this into consideration, it is concluded that the proposed Strategic Site as proposed cannot be delivered in any other location and that Central Lancashire's future employment development needs require the release of land from the Green Belt as well as maximising development yields from the main urban areas, something that is recognised in by Lancashire County Council in its Statement of Common Ground with CLA.

6.53 Therefore the proposed Strategic Site will not be a barrier towards urban land from coming forward for development nor would it deliver a form of development which could otherwise be located within the urban area. It will therefore make no contribution to Green Belt Purpose E.

## Conclusion in respect of Green Belt purposes

6.54 The assessment above has demonstrated that the Proposed Development will result in some impact to the five purposes of the Green Belt as follows:

- Purpose A: To check the unrestricted sprawl of large built-up areas - **no contribution**
- Purpose B: To prevent neighbouring towns merging into one another - **no contribution**
- Purpose C: To assist in safeguarding the countryside from encroachment - **moderate contribution**
- Purpose D: To preserve the setting and special character of historic towns - **negligible contribution**
- Purpose E: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land - **no contribution**

## An Achievable Site

6.55 Logik has put forward an outline planning application for an employment-led development as part of the proposed Strategic Site Allocation, which is backed up by commercial analysis, evidence of market demand, and discussions with interested funders and operators. There is a very realistic prospect that such proposals can be delivered, indeed there is a strong interest from potential end-users.

6.56 In terms of potential technical constraints, the outline planning application seeks to respond to all relevant constraints, including transport, flood risk, drainage and utilities constraints, ecology and heritage. Logik wrote to Elizabeth Hindle at South Ribble Council on 17 March 2025 to set out that further information would be submitted to the Council to address all outstanding comments on that application and demonstrate that there are no technical constraints that would prevent the site coming forward in a short timescale.

## Summary

6.57 The CLLP must address the growing shortfall in employment land and the region's need for strategic land use to foster growth. The overestimation of available land and the underestimation of demand presents a significant risk to the region's economic future. A strategic site allocation at Cuerdale is a critical part of the solution, offering much-needed employment space located near the Samlesbury EZ and the NCF campus.

- 6.58 Despite the site being located on Green Belt land, it is Logik's position that the only contribution that the proposed Strategic Site makes to the Green Belt is a moderate contribution in regard to Purpose C - to assist in safeguarding the countryside from encroachment. Logik agreed with the assessment of the CLA's Green Belt Designations Study (2022, prepared by LUC), which considered the ratings for the wider Parcel 14's strategic contribution to the Green Belt purposes for all other purposes was "limited/no" contribution.
- 6.59 It is also noted that Proposed Strategic Site was previously included as a wider "Preferred Growth Option" as part of the wider Cuerdale Garden Village in the Preferred Options Local Plan. The initial site assessment is shown within the South Ribble Site Profiles, and it is titled Site Profile 26, and concludes that the site is suitable, available and achievable. There is no evidence or justification provided as part of the Regulation 19 draft CLLP to specifically address why this Preferred Growth Option has been discounted.
- 6.60 Logik considers that its strategic importance to regional economic growth, and lack of impact on the Green Belt, justifies the inclusion of a Strategic Site Allocation at Cuerdale in the development plan. The site's proximity to key employment hubs, its excellent transport links, and its potential to support high-value industries such as cybersecurity and defence should make it an essential component of the region's economic strategy.
- 6.61 The strategic case for the Cuerdale development is compelling. The site offers an opportunity to address several pressing regional challenges, including the need for employment land, job creation, and infrastructure investment. The flaws in the current Central Lancashire Local Plan highlight the importance of revising land allocations to ensure that the region is equipped to meet future demand. By recognising the opportunity at Cuerdale as a Strategic Site Allocation for employment development, Central Lancashire can capitalise on the economic opportunities presented by key projects such as the National Cyber Force and Samlesbury Enterprise Zone, ensuring long-term prosperity and sustainability for the region.

## 7. Proposed Modifications to Address Soundness Concerns

- 7.1 Chapter 5 of these representations set out Logik's case for why the Regulation 19 draft CLLP is unsound. Chapter 6 sets out the strategic case for the CLLP to include for a new Strategic Site Allocation at Cuerdale.
- 7.2 In light of the above, the purpose of this Chapter is to set out the proposed modifications put forward by Logik to address the current failings of the Regulation 19 draft CLLP.

### Modification 1 - Policy SS2: Settlement Hierarchy

- 7.3 Logik considers that Policy SS2 should be amended to reflect the potential for strategic development around Cuerdale / Salmesbury within the plan period. Logik's suggested amendments to the policy are in **bold** below:

*"Policy SS2: Settlement Hierarchy*

*The scale and location of development growth and supporting investment across Central Lancashire will reflect the following settlement hierarchy:*

*a) The Preston Urban Area (Tier 1) will be the primary focus for development growth and investment, the largest amount of new development will be directed here. This will be delivered through a combination of redevelopment and regeneration activity and major new development to meet strategic general housing, employment, and commercial development needs.*

*b) Key Service Centres (Tier 2), including the towns of Leyland and Chorley and **development in the South Ribble Urban Area** will be the secondary focus for development, complementing the role of the Tier 1 Urban Area. This will be delivered through allocated sites in and adjoining the towns, windfall sites and town centre renewal activity to meet development needs.*

*c) Urban Local Service Centres (Tier 3) will be a tertiary focus for development and accommodate new development and investment within settlement boundaries. The scale and type of development will be appropriate to the settlement size and reflect its characteristics.*

*d) Rural Local Service Centres (Tier 4) will accommodate limited new development, appropriate to the settlement size, to help meet local housing and employment needs and help sustain local services and facilities.*

e) *Smaller Rural Villages and Hamlets (Tier 5) will accommodate more limited new development and investment, other than on the sites identified on the Policies Map.*

- 7.4 Table 1: Settlement Hierarchy should also be modified accordingly to reflect the above, with the text relating to Tier 2 amended to read:

*“Land within: a) Leyland and ~~the~~ South Ribble ~~Urban Area~~ (Penwortham, Walton-le-Dale, Lostock Hall, **Cuerdale**, and Bamber Bridge)”*

## **Modification 2 - New Strategic Site Allocation for Cuerdale**

- 7.5 For the multitude of reasons set out in these representations Logik strongly considers that a new Strategic Site Allocation should be insert to reflect the strategic requirements for employment-led development at Cuerdale.
- 7.6 Logik does not proposed any modifications to the general thrust of “Strategic Site Allocations - Introduction” at paragraph 3.22, which states that: “Planned new development at a strategic scale brings a range of benefits, such as securing infrastructure alongside growth, and provides an effective source of development delivery over time. Strategic sites are central to the delivery of the spatial strategy, Policies SS1 and SS2, and achieving sustainable development.” However, Logik strongly suggests that a new Strategic Site Allocation, and associated new Policy SS7 (Cuerdale), to address the strategic potential and requirements at Cuerdale.
- 7.7 Logik would be willing to work with the CLA (and other stakeholders) to provide details to help draft the new Strategic Site Allocation, however, considers that this should be based on its submitted outline planning application, its additional land interests, and the potential already considered by the CLA for the wider Cuerdale Garden Village Site Profile (Site Profile 26) in the Preferred Options - Part 1 draft CLLP (i.e. the extent of land shown in Appendix 5). Again, Logik reiterates that there is no clear evidence to support this wider site not being progressed other than a reliance on deeply flawed evidence.

## **Modification 3 - Policy EC1: Scale of Economic Growth**

- 7.8 For the multitude of reasons set out in these representations Logik strongly considers that the evidence base used to provide the scale of economic growth required within the plan period, and in South Ribble in particular, is deeply flawed.

7.9 Logik, therefore, strongly considers that modifications are required to Policy EC1 (Strategic Policy): Scale of Economic Growth to reflect the true scale of the employment land required to support both local and wider strategic employment needs, and that economic growth and employment land supply will be provided for through existing and new employment allocations and extant planning permissions. Logik considers it imperative that the requirements need to be based on a sound evidence base and consider now the implications of the NCF, acknowledging the need for a Strategic Site Allocation at Cuerdale.

7.10 Logik considers that Policy EC1 should be amended to reflect the true employment needs of the area and the potential for strategic development around Cuerdale / Salmesbury within the plan period. Logik's suggested amendments to the policy are in **bold** below:

*"Policy EC1 (Strategic Policy): Scale of Economic Growth*

*Employment Land Supply*

1. Over the Plan period, provision will be made for a minimum of **173 [tbc]** hectares of employment land to support both local and wider strategic employment needs. The objectively assessed need is summarised below:

**[Table to be updated in accordance with robust evidence base]**

2. Economic growth and employment land supply will be provided for through existing and new employment allocations and extant planning permissions.

*Employment Land Distribution*

3. Preston City Centre will be the focus for regional and sub-regional office development with a secondary focus in Leyland and Chorley Town Centres, particularly Chorley's proposed new civic square.

4. Policies EC2-6 identify employment and mixed-use allocations, which will meet the need for additional office accommodation and provide sufficient quantity, range and choice of sites to meet industrial/warehouse needs throughout the Plan period and help deliver economic growth.

5. The Salmesbury Advanced Engineering and Manufacturing Enterprise Zone **and the Cuerdale Strategic Site Allocation** will continue to be a regionally significant site for employment. Local Development Order(s) (LDOs) will continue to help deliver the Salmesbury

*Enterprise Zone. Development likely to compromise its delivery or operation of the Enterprise Zone will not be supported."*

## 8. Participation at Hearing Sessions

- 8.1 Logik confirms that it would wish to take part in any relevant Hearing Session(s) as part of the Local Plan Examination in Public.

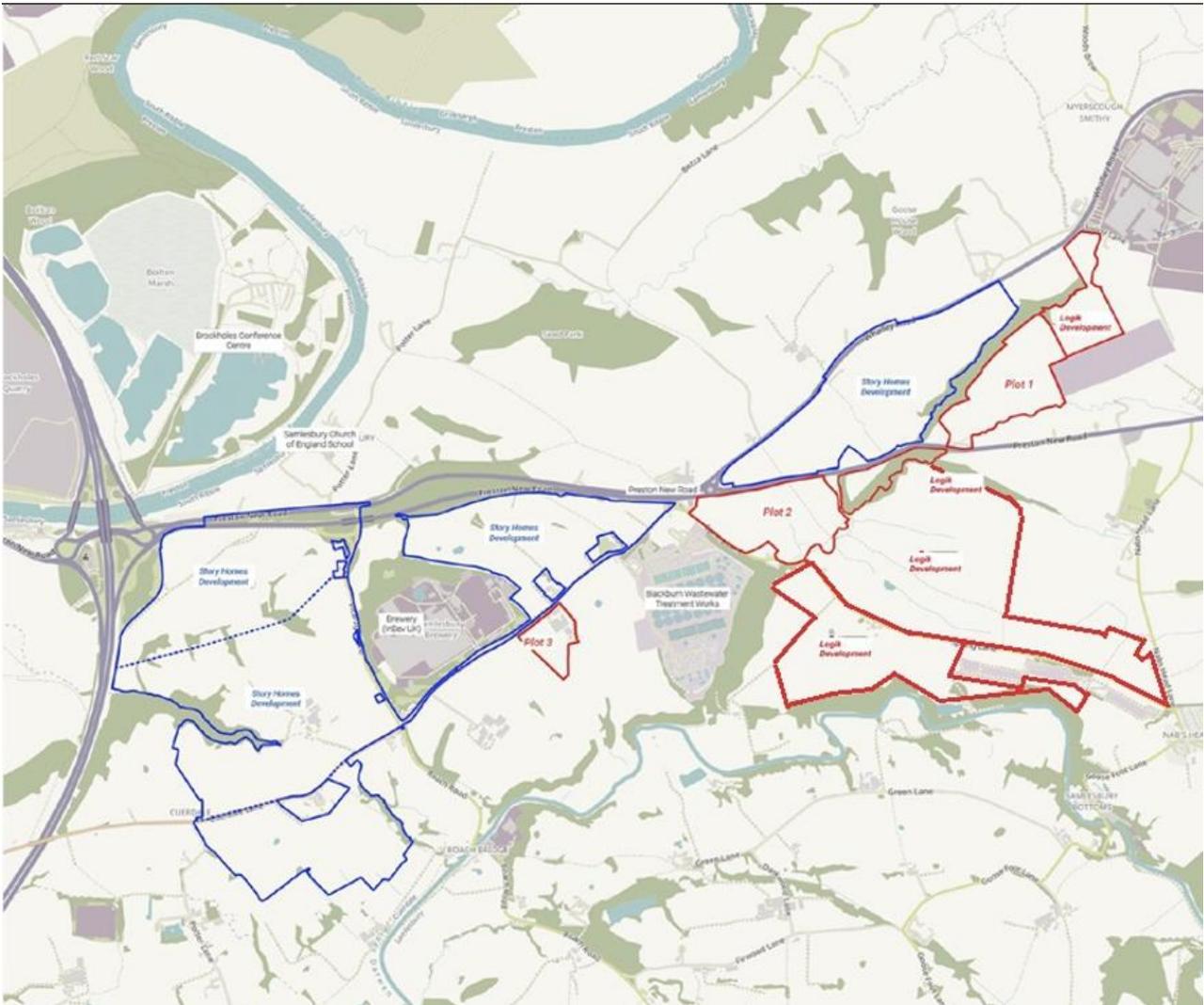
## 9. Conclusion

- 9.1 Logik has a vested interest in South Ribble and the draft CLLP having worked with the Council to help deliver important developments in the borough, including providing assistance to the Council in bringing Lancashire County Cricket Club and the National Cyber Force (NCF) development, and having submitted an outline planning application in December 2022 (ref: 07/2023/00035/OUT) for the first phase of a new employment-led development across three development plots on Land West of Samlesbury. The planning application was submitted following extensive and positive pre-application discussions with key local politicians and Senior Planning Officers. This representations are, however, separate to the ongoing discussions with SRBC officers on the application.
- 9.2 In parallel with preparing its planning application, Logik has also engaged with the Council at all key stages of the Local Plan process to date. Most recently, this included detailed representations to the CLLP Preferred Options (Part One), supporting (at that time) a preferred growth option around Cuerdale and the potential for Green Belt release in South Ribble.
- 9.3 Logik notes that the Central Lancashire Authorities (CLA) has now opted to progress the draft CLLP under the transitional arrangements contained within the December 2024 National Planning Policy Framework (NPPF) and claims it has met the 80% housing requirement. Given Logik's interests in promoting its sites for employment-led development these representation do not include any commentary or critique of the housing numbers, however, Logik is concerned that by rushing the Regulation 19 consultation on the CLLP to take advantage of the transitional arrangements it has neglected its responsibilities to plan for growth, deliver on its own vision, and based its employment policies on a deeply flawed evidence base that renders the current draft CLLP unsound.
- 9.4 Logik, has fundamental concerns about the soundness of the draft CLLP, against all of the relevant tests set out in the NPPF.
- 9.5 Fundamental to Logik's concerns about the soundness of the draft CLLP are the findings of a detailed report by Wisser Consulting that has reviewed the employment land evidence base by the BE Group, including both employment land need and employment land supply. Logik strongly considers that the CLLP does not seek to meet the area's objectively assessed employment needs, nor properly consider the requirements of all available sites. The current approach fails to account for the true scale of employment demand and the need for realistic

land supply, both now and including the NCF, potentially sidelining vital economic opportunities for the sake of avoiding a Green Belt review. This was seemingly flagged by Lancashire County Council in its engagement with the CLA.

- 9.6 Logik's position is that the CLLP must address the growing shortfall in employment land and the region's need for strategic land use to foster growth based on new and robust employment land evidence and, if required, a Green Belt review. The overestimation of available land and the underestimation of demand presents a significant risk to the region's economic future. A strategic site allocation at Cuerdale is a critical part of the solution, offering much-needed employment space located near the Samlesbury Enterprise Zone and the NCF campus.
- 9.7 Logik considers that its strategic importance to regional economic growth, and lack of impact on the Green Belt, justifies the inclusion of a Strategic Site Allocation at Cuerdale in the development plan, and the strategic case for the Cuerdale development is compelling. The site's proximity to key employment hubs, its excellent transport links, and its potential to support high-value industries such as cybersecurity and defence should make it an essential component of the region's economic strategy.
- 9.8 Logik has, therefore, suggested that the CLLP needs to be updated to reflect the serious flaws in the underlying evidence base that currently renders the plan unsound, and set out a series of modifications to strategic Policies SS2 and EC1, and the insertion of a new policy, to reflect a Strategic Site Allocation at Cuerdale.
- 9.9 Logik would be happy to discuss any element of these representations with the CLA in more detail, and would be happy to work with officers to ensure that the future iterations of the CLLP adequately address the points raised, including the potential content of a draft Strategic Site Allocation at Cuerdale.

# Appendix I Logik’s Land Interests in Cuerdale



**Extent of Logik’s Land Interests in Cuerdale is Shown in Red.**

Note That Plots 1, 2 and 3 Form Part of Logik’s Current Outline Planning Application (ref: 07/2023/00035/OUT).

For Context, the Extent of the Adjacent Live Planning Application by Story Homes is Shown in Blue.

# Appendix II      Previous Logik Representations (February 22)

# **R**epresentations to Central Lancashire Local Plan Preferred Options (Part One)

Cuerdale Employment Sites, Land West Of Samlesbury, Lancashire.

February 2023

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# Appendices

- Appendix I Site Location Plan
- Appendix II Employment Land Demand Report

**Report title: Representations to Central Lancashire Local Plan Preferred Options (Part One)**

**Date:** February 2023

**Authors:** VR/NL

**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

1.1 These representations are made on behalf of Logik Strategic Land Ltd in response to the consultation on the draft Central Lancashire Local Plan Preferred Options (Part One).

1.2 These representations are made in relation to Logik Strategic Land's interest at Cuerdale (referred to as the "Cuerdale Employment Sites") which form part of the wider proposals for a new Cuerdale Garden Village within the Salmesbury Growth Area. Logik Strategic Land and Story Homes are joint promoters of the Garden Village and have worked collaboratively to present a comprehensive masterplan for the combined area. Whilst Logik Strategic Land and Story Homes have submitted separate representations to the draft Local Plan, they are committed to its joint promotion and strategic importance to the area.

1.3 In its totality the, the proposed Cuerdale Garden Village being jointly promoted by Logik Strategic Land and Story Homes has the ability to deliver:

- 2,300 high quality homes of varied type and size, including 35% affordable homes, older persons accommodation and other specialist housing, including self-build plots;
- 470,500 sq m of varied employment space, suitable for a range of businesses operating in different sectors. This includes larger scale logistics space through to smaller scale SME sized facilities, including office, research and development and advanced manufacturing space.
- 2 no. new primary schools
- 2 separate local centres, including retail and community facilities
- A c1,800 sq m supermarket plus 7,500sqm of additional retail floorspace
- The potential for 2 hotels
- A family restaurant
- A community hospital
- 3,600 sq m of playing pitches
- A 500 space Park and Ride facility
- Six children's play areas
- A minimum of 122 ha of public open space

- 1.4 An indication of the proposed masterplan is contained within Appendix 1 and shows the full extent of the proposed Garden Village, as well as the land subject to the first phases of its delivery for which planning applications have already been submitted to South Ribble Council. Taken as a whole, the proposals will create a sustainable Garden Village which will deliver a significant proportion of Central Lancashire's housing and employment land needs over the emerging plan period, as well as supporting other planned strategic investments including the Salmesbury Enterprise Zone and the National Cyber Force Campus.
- 1.5 Logik Strategic Land submitted an outline planning application to South Ribble Borough Council in December 2022 (ref: 07/2023/00035/OUT) for the first phase of a new employment-led development across three development plots on Land West of Samlesbury. Story Homes submitted an outline planning application for the development of the first phase of its part of the Cuerdale Garden Village in May 2022 (application reference 07/2022/00080/SCE). The Story Homes outline application for the Garden Village comprises up to 1,300 dwellings, up to 164,000sqm of employment floorspace and associated community facilities and infrastructure.

### **Logik Strategic Land**

- 1.6 Logik Strategic Land Ltd have more than 50 years' experience in developing strategic sites that create inspiring places for people to live, work and play – places that people can be proud of. Creating a legacy is at the heart of absolutely everything the applicant does, which is why their collaborative approach with funders and local authorities has impact and ensures they're able to unlock and transform new spaces.

## 2. Cuerdale Employment Sites and future phases

### Cuerdale Employment Sites (planning app ref.)

- 2.1 As previously stated, an outline planning application for a new employment-led development across three development plots on Land West of Samlesbury was submitted to South Ribble Borough Council in December 2022 (ref: 07/2023/00035/OUT). A location Plan and illustrative masterplan of showing the first phase of this development opportunity (referred to as the “Cuerdale Employment Sites”) is shown below in red, alongside the most immediate part of the Story Homes application. These can also be viewed in Appendix 1 of this report.

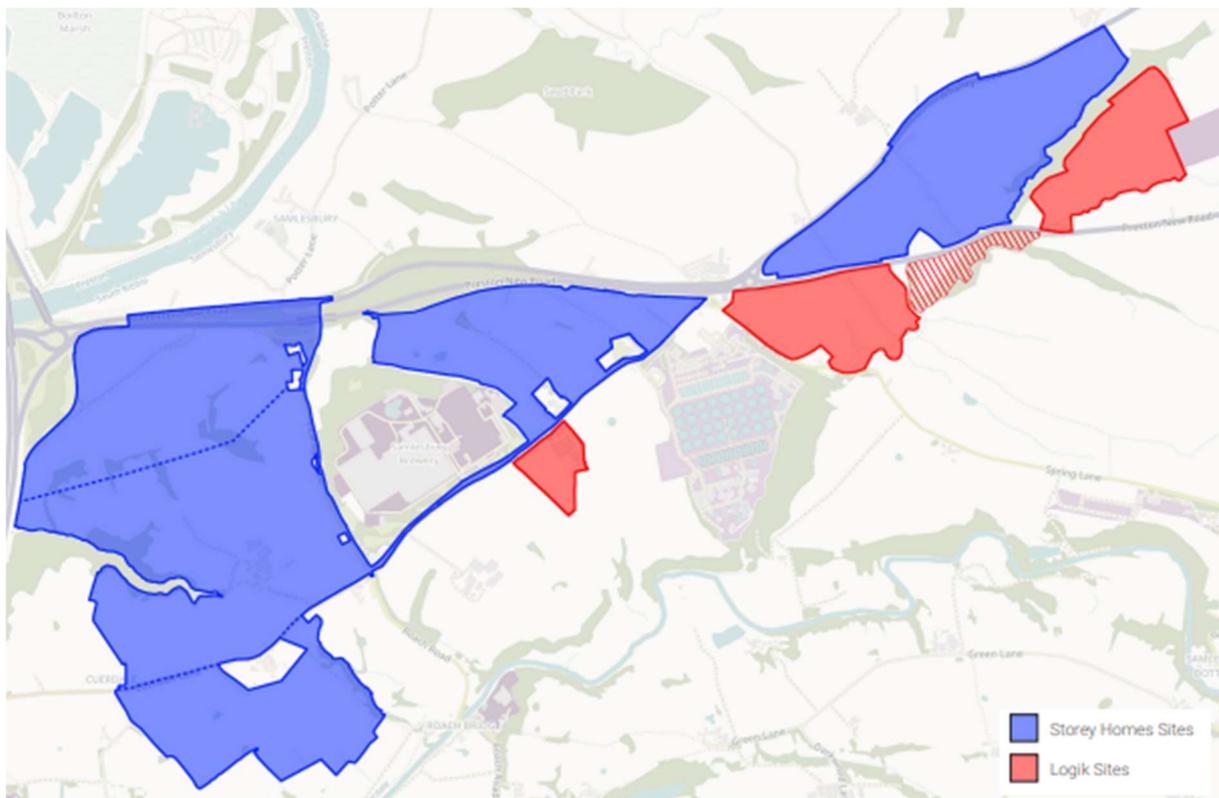


Figure 1: Location Plan of Cuerdale Employment Sites (in red) contained in the outline planning application, with part of the Story Homes proposals in blue

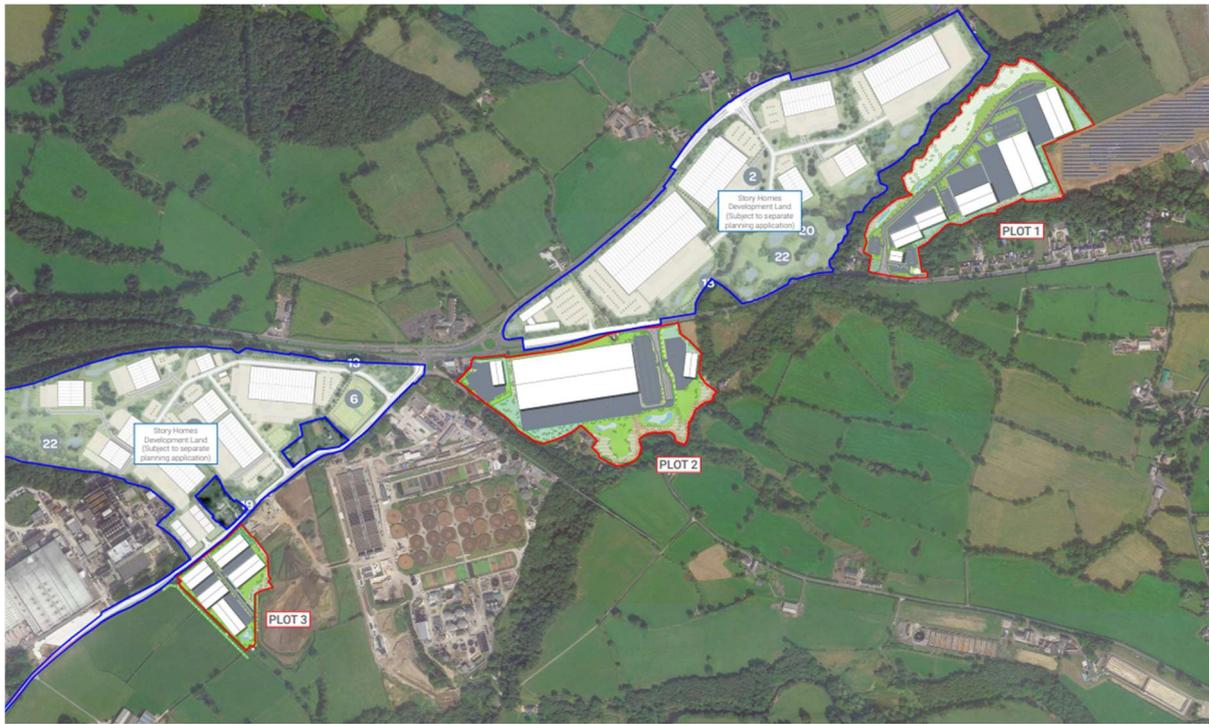


Figure 2: Illustrative Masterplan of Cuerdale Employment Sites outline planning application

2.2 The proposals submit to the current planning application extend to 27 hectares (ha) in area and comprises a collection of 3 plots of land located to the west of Samlesbury, South Ribble. Plots 1 and 2 are situated along the A377 Preston New Road, and Plot 3 is located along the B6230 Cuerdale Lane.

2.3 The description of development as per the application forms is as follows:

*“Outline planning application (with all matters reserved) for an employment-led mixed use development comprising up to 170,000 sqm of employment floorspace (Use Class B2 / B8), up to 10,000 sqm of C1 Hotels, 5,000 sqm of Class E(b) retail use, and up to 7,500 sqm of Class E(g) office use, with associated car parking, service yards and loading bays, landscaping and associated access across 3 plots of land at Cuerdale, land to the West of Samlesbury, South Ribble.”*

2.4 The overall vision is to create a flagship employment development, which would deliver significant benefits for the South Ribble Borough and surrounding wider area of the North West. The overarching aims of the development are to:

- Deliver a commercial development that will appropriately complement the adjacent Enterprise Zone and National Cyber Force Campus, contributing to the wider growth opportunity and evidenced market need;
- Create a new development of the highest quality design quality which is befitting of the scale and significance required at this location; and,

- Respect the character and qualities of the existing environment, by minimising any potential adverse effects and supporting this with a package of social, economic and environmental enhancements.

2.5 The proposal would play an important strategic role in solidifying this area of the North West as a stronghold for commercial and industrial economic contributors. The output in productivity and economic terms envisioned should not be overlooked and would play an important role in further advancing South Ribble's growth opportunity and inward investment.

2.6 The maximum total floorspace proposed in the outline planning application is 184,200m<sup>2</sup> GEA, which comprises the maximum permissible floorspace envisaged. Table 1 below sets out the proposed maximum floorspace figures that will be sought for each category of land use proposed across the entire site:

USE	MAXIMUM FLOORSPACE (GEA sqm)
Use B2/B8 (Industrial)	170,000sqm
Use E(b) (Retail)	5,000 sqm
Use E(g) Office	7,500 sqm
Use C1 (Hotel)	10,000 sqm

Table 1: Proposed Maximum Floorspace Figures per Use Class

2.7 As mentioned above, the submitted outline application is spread across an initial three plots of land. Table 2 below provides an indicative summary description of each Plot within the application site.

Plot	Summary Description
<b>Plot 1</b>	Mixed use development. The principal land use would be industrial (Use B2/B8) with associated service yards, car parking and loading bays, with flexible use of a potential roadside building for any of the following uses, namely food retail (Use E(b)) or office (Class E(g)).
<b>Plot 2</b>	Mixed use development. The principal land use would be industrial (Use B2/B8) with associated service yards, car parking and loading bays, with flexible use of potential smaller buildings

	for any of the following uses, namely food retail (Use E(b)), office (Class E(g)), or hotel (Class C1).
<b>Plot 3</b>	Industrial development (Use B2/B8) with associated service yards, car parking and loading bays.

Table 2: Summary description of plots 1,2 and 3

### Future Phases of the Cuerdale Employment Sites

- 2.8 The submitted outline planning application includes three initial plots of land, however Logik Strategic Land has a land interest in a further two plots of land that should be considered as viable and deliverable future phases of the Cuerdale Employment Sites development, and the wider Cuerdale Garden Village proposals, in the emerging Local Plan. All five plots are capable of delivering high quality employment land within the preferred strategic growth location within the next 15 years of the emerging plan period.
- 2.9 Figure 3 below shows the location of all 5 plots of land that Logik Strategic Land are submitting for consideration as part of these representation for inclusion in an allocation for the wider Cuerdale Garden Village and Growth Area:

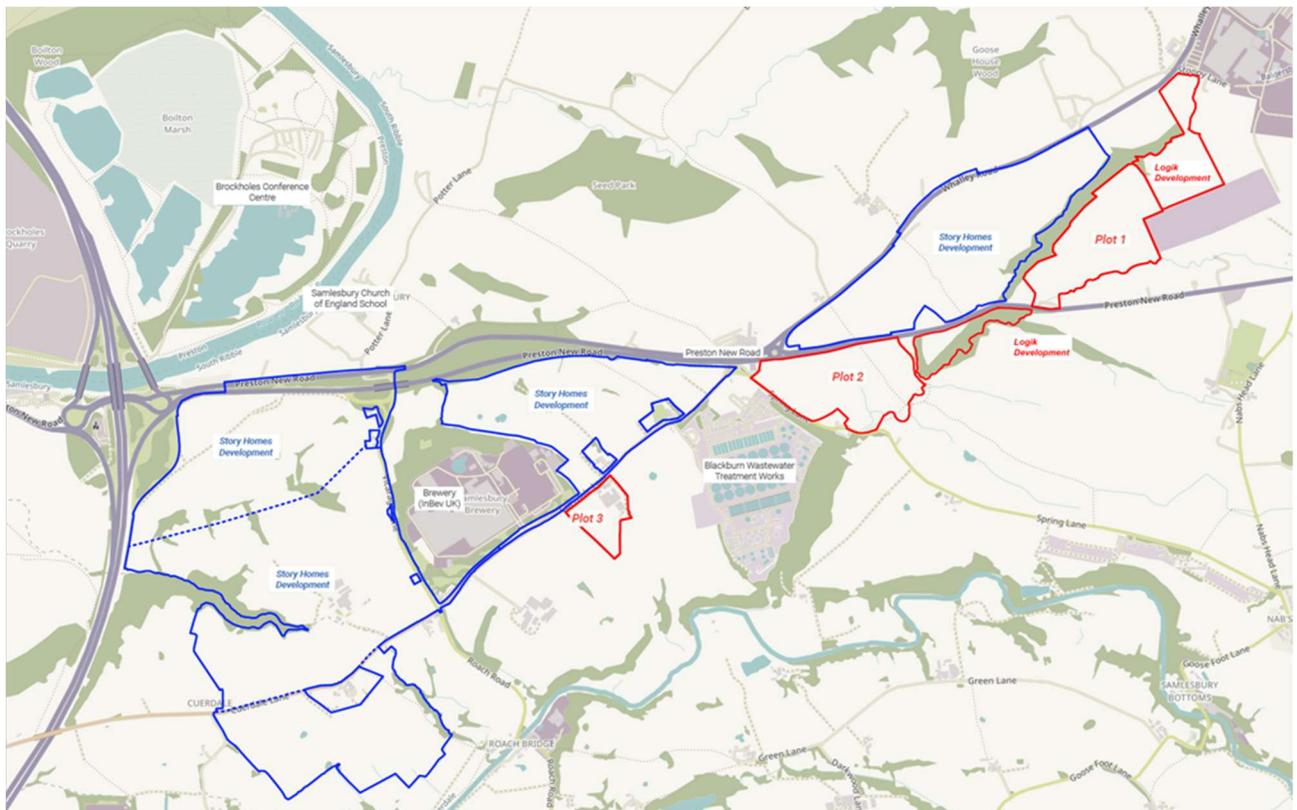


Figure 3: Location Plan of all phases of Cuerdale Employment Sites (in red), again shown with the Story Homes proposals in blue

2.10 An indicative quantum of employment floorspace that could be achieved on these 2 additional plots, as Logik's landholdings in total, is set out below in Table 4, and the total potential floorspace for **all** phases of the Cuerdale Employment Sites in Table 5.

USE	MAXIMUM FLOORSPACE (GEA sqm) FOR <u>ADDITIONAL</u> 2 PHASES
Use B2/B8 (Industrial)	41,000sqm
Use E(b) (Retail)	2,500 sqm
Use E(g) Office	4,000 sqm
Use C1 (Hotel)	5,000 sqm

*Table 4: Indicative Maximum Floorspace Figures per Use Class for 2 Additional Phases*

USE	MAXIMUM FLOORSPACE (GEA sqm) FOR <u>ALL</u> PHASES
Use B2/B8 (Industrial)	211,000sqm
Use E(b) (Retail)	7,500 sqm
Use E(g) Office	11,500 sqm
Use C1 (Hotel)	15,000 sqm

*Table 5: Indicative Maximum Floorspace Figures per Use Class for All Phases of Cuerdale Employment Sites*

2.11 It is noted that a preferred draft allocation for the Cuerdale Garden Village has been included in the Preferred Options Local Plan under the site assessments. This includes the three initial plots within the Cuerdale Employment Sites outline planning application and a fourth plot to the east of plot 2. The one additional plot put forward as part of these representations would form a logical extension to the draft allocation, and would provide for c. 30,000 sqm of employment land furthering the critical mass and contribution that the proposed Cuerdale Garden Village can make to addressing strategic needs in the plan period. As such, it is strongly considered that this additional land should be included in the draft allocation. These representations will demonstrate further the overall case for the inclusion of all five plots in the Cuerdale Garden Village preferred draft allocation.

### 3. Strategic case for development at Cuerdale

3.1 This section of these representations outlines the strategic and economic case for the inclusion of all five development plots of the Cuerdale Employment Sites to be removed from the Green Belt and be included in the emerging Local Plan as part of the wider Cuerdale Garden Village allocation.

#### **A Strategically Important Economic Location**

3.2 The five plots that comprise the totality of Cuerdale Employment Sites opportunity submitted as with these representations represent a key strategic location for providing much needed employment uses, and provide a prime opportunity to deliver a significant employment led development that will heavily contribute to the economy of the immediate area but also on a regional basis for the North West.

3.3 No other site in Central Lancashire possesses the locational attributes of the proposed allocation and the wider Cuerdale Garden Village proposals being promoted by Logik Strategic Land, South Ribble Borough Council, and Story Homes. Central to this is the combination of the Site's location adjacent to the Samesbury Enterprise Zone, containing a critical mass of existing employment and planned future, high value employment uses; the adjacency of the planned National Cyber Force (NCF) campus – a truly transformational project which will have a significant impact on the local economy through the creation of specialised and high value employment; and the site's situation on the M6 motorway and directly accessible to both Preston and Blackburn as key economic and population centres in the context of the county.

3.4 It is these locational attributes which reveal and shape the opportunity at Cuerdale. Realising the potential of this critical economic location requires employment space, providing the infrastructure needed to enable future investments in the area to realise their full effect. There is a pressing and evidenced market need for more business space with strategic access to the M6 and the NCF campus presents an opportunity for Central Lancashire to capture investment from businesses that have an inherent interest in locating close to the NCF campus in providing supply chain services and activities, creating a cluster of complementary businesses in the area.

## The Lancashire Arc of Prosperity

- 3.5 The Cuerdale Employment Sites (and wider Cuerdale Garden Village opportunity) lie within the centre of Lancashire's 'Arc of Prosperity'; a corridor which contains most of the county's largest urban areas generating around 75%<sup>1</sup> of Lancashire's wealth and providing the primary focus of the Lancashire Enterprise Partnership's economic and housing growth plan.
- 3.6 The Arc clearly signals where the new jobs and growth in Lancashire will be generated, supported by key economic and transport interventions. More than 90%<sup>2</sup> of the county's employment land allocations will be located on sites, and at locations, within the Arc.
- 3.7 The Site is located close to the M6 meaning it is well-connected to destinations across the north-west and is suited to deliver social and economic benefits that enable South Ribble to take full economic advantage of its position within Lancashire. The A59 and A677 corridors function as strategic routes to the Ribble Valley and East Lancashire (including Blackburn and Burnley) respectively.

## The Samlesbury Enterprise Zone

- 3.8 The Samlesbury Enterprise Zone (SEZ) incorporates 50 hectares of land at the former Samlesbury Aerodrome. It is adjacent to the active BAE Systems complex, one of the world's most advanced, technology-led defence, aerospace and security solutions companies, and is one of four Enterprise Zones in Lancashire.
- 3.9 Located in the heart of the largest cluster of aerospace production in the UK which employs 13,000 people<sup>3</sup>, Samlesbury is a national centre for excellence for advanced engineering and manufacturing companies. The SEZ is located approximately 400m to the east of the Cuerdale Employment Sites, accessible at the north via the A59. The designated Enterprise Zones are key economic drivers of the county, supporting growth and diversification and delivering significant employment opportunities for the area.
- 3.10 The SEZ benefits from a Local Development Order (LDO) which permits the development of advanced manufacturing and research (specifically relating to aerospace, aviation, motoring, computing, nuclear, flexible materials and renewables) uses without the need for planning permission. The LDO was confirmed by the Council in 2012/13 and has resulted in a number of different developments by BAE

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<sup>1</sup> The Lancashire Skills and Employment Strategic Framework 2016-2021

<sup>2</sup> The Lancashire Skills and Employment Strategic Framework 2016-2021

<sup>3</sup> <https://investinlancashire.com/enterprise-zones/samlesbury-aerospace-enterprise-zone/>

Systems (one now operated by Wincanton), alongside Sheffield University. The developments include logistics warehousing, a training facility and an advanced manufacturing research centre.

- 3.11 A large proportion of the SEZ remains undeveloped with potential for significant future investment. It is therefore recognised that there will continue to be a focus on maximising the economic potential of the SEZ through the future Central Lancashire Local Plan.

### **BAE Systems and Major Employers**

- 3.12 BAE Systems is a global defence, aerospace and security company employing around 82,500 people worldwide<sup>4</sup>. BAE Systems employs around 3,000 people at their Samlesbury complex which has a history dating back almost 100 years.
- 3.13 The site has been at the forefront of aircraft manufacturing and continues to manufacture fuselage and aircraft component for the Royal Air Force. The BAE Academy for Skills & Knowledge at the SEZ, a £15.6m investment, is also located alongside the advanced manufacturing hub in Samlesbury and will be home each year to nearly 200 apprentices in training recruited by BAE's Military Air & Information business. The facilities are located approximately 1.1km to the east of Plot 1.
- 3.14 The Cuerdale Employment Sites, alongside the wider Garden Village Proposals, offers BAE Systems, in particular, the opportunity to create a strong local supply chain and to facilitate the movement and storage of materials/ goods required to support the ongoing operations at the complex.

### **National Cyber Force Campus (NCF)**

- 3.15 The National Cyber Force was announced by the Prime Minister as part of the Integrated Review in November 2020. The joint Ministry of Defence (MoD) and Government Communications Headquarters (GCHQ) partnership is helping keep the country safe as the new home of offensive cyber operations.
- 3.16 The permanent site of the NCF will be established in Samlesbury, cementing the North-West region's position as the cyber centre of the UK. GCHQ already have an office in Manchester and the city is Europe's fastest growing major tech cluster, with more than 15% of Manchester's population employed by the digital, creative and technology sector.
- 3.17 The new NCF campus will represent at least a £5bn investment with a report published in April 2021<sup>5</sup> referencing the ambition to employ 3,000 personnel by 2030 on the site. The NCF will draw together personnel from intelligence, cyber and security agency GCHQ, the MoD, the Secret Intelligence Service

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<sup>4</sup> <https://samlesburyez.com/>

<sup>5</sup> The National Cyber Force that Britain Needs? (April 2021), Cyber Security Research Group et al Kings College London

(MI6) and the Defence Science and Technology Laboratory (DSTL), under one unified command for the first time.

3.18 The Government outlines that the new campus will help grow technology, digital and defence sectors, as well as encouraging partnerships between government, industry, and universities in the region. The Cyber Force in Samlesbury will embrace exciting new offensive cyber technologies and provide thousands of highly skilled jobs and expertise to the North West.

3.19 The significance of this development is underlined by the direct reference to this investment in the Levelling Up White Paper where it is confirmed that it ‘*will boost the local economy and create jobs*’<sup>6</sup>.

3.20 In the announcement for the campus published by the Government, Defence Secretary Ben Wallace said:

*‘I am hugely proud and enthusiastic to see this happen, not only will it provide a catalyst for investment, but also see our levelling up agenda bring economic stimulus and tangible benefits to this region.’*<sup>7</sup>

3.21 Chancellor of the Duchy of Lancaster Steve Barclay in the same publication also said:

*“The National Cyber Force is at the cutting edge of our country’s defence. Basing the campus at Samlesbury in Lancashire will bring high skilled and well paid jobs to the area, building on our drive to move key public sector roles outside of London. It underlines this government’s important levelling up agenda and our commitment to spread opportunity across the country.”*<sup>8</sup>

3.22 The pace at which the investment is intended to proceed means that the Proposed Development offers a critical opportunity to ensure that the associated additional arising needs related to supporting infrastructure, including employment floorspace, are accommodated in South Ribble and Central Lancashire, therefore also capturing a greater share of the associated benefits.

3.23 The draft Central Lancashire Local Plan Preferred Options – Part One Consultation clearly outlines that Central Lancashire Authorities consider that it is important to start exploring potential options for accommodating growth in the next Local Plan period but also taking advantage of opportunities presented for this emerging plan period. This includes the potential for an area of growth based around the A59 and that the National Cyber Force at Samlesbury.

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<sup>6</sup> Levelling Up the United Kingdom White Paper (2022)

<sup>7</sup> <https://www.gov.uk/government/news/permanent-location-of-national-cyber-force-campus-announced>

<sup>8</sup> <https://www.gov.uk/government/news/permanent-location-of-national-cyber-force-campus-announced>

## Economic Policy Context

### Levelling Up White Paper

- 3.24 The Levelling Up White Paper, published by Government in February 2022, establishes the objective to *'end the geographical inequality which is such a striking feature of the UK'*. It highlights how this *'needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all'* and it recognises that *'while there are world-leading and enterprising businesses and innovators right across the UL, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly in the South East of England'*.<sup>9</sup>
- 3.25 The Cuerdale Employment Sites, alongside the wider Garden Village and the emerging Samlesbury Growth Area, is located within the North of England, an area identified within the White Paper where productivity and other key socio-economic indicators fall below national averages – thus requiring 'Levelling Up'. The Government's commitment to assisting this process in Central Lancashire is underlined by its confirmed investment in the NCF campus which it confirms in the White Paper *'will boost the local economy and create jobs'*<sup>10</sup>. The Cuerdale Employment Sites would thus support the aspirations outlined in the White Paper and build upon the growth, investment and employment opportunities identified.

### Lancashire Strategic Economic Plan (SEP)

- 3.26 The Lancashire Strategic Economic Plan (prepared by the Lancashire Enterprise Partnership, March 2014), is described as *'a Growth Deal for the Arc of Prosperity'* and sets out the growth ambitions for the next 10 years, with a clear focus on realising the potential of the whole of Lancashire.
- 3.27 The SEP is supported by a Business Plan (2017-20) which builds upon on the SEP and began to set out the priorities within its programme of works.
- 3.28 The Business Plan continued the SEP's championing of the Lancashire advanced manufacturing and energy cluster, recognising that the four Enterprise Zones spanning three sites – including Samlesbury in Central Lancashire – are strongly aligned with Lancashire's key sectors with each site focusing on advanced manufacturing, energy, advanced materials and chemicals.
- 3.29 The Cuerdale Employment Sites, and wider Cuerdale Garden Village, is centrally located within the Arc of Prosperity which is outlined in the relevant section above and spans most of the main urban areas

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<sup>9</sup> Levelling Up the United Kingdom White Paper (2022), page xii

<sup>10</sup> Levelling Up the United Kingdom White Paper (2022), page 269

of Lancashire. The large level of employment floorspace proposed to meet subregional demand and also support the highly skilled roles within Samlesbury Enterprise Zone and the proposed Cyber Force Campus would contribute significantly to the aims and objectives of the SEP.

## **Conclusion**

3.30 The Cuerdale Employment Sites, as part of the wider Cuerdale Garden Village are within the identified Strategic Growth Option and are ideally located nearby to the substantial planned investment at Samlesbury Enterprise Zone and the National Cyber Force campus. No other site in Central Lancashire possesses the locational attributes of the Cuerdale Employment Sites and the Garden Village. The Cuerdale Employment Sites will provide high quality employment land floorspace and provide premises for occupiers that have an inherent interest in locating close to the Samlesbury Enterprise Zone and NCF campus in providing supply chain services and activities, creating a cluster of complementary businesses in the area.

## 4. Key areas of representations on Central Lancashire Preferred Options (Part one)

4.1 This section sets out Logik Strategic Land's principal comments on the draft Local Plan.

### Spatial Strategy

4.2 The proposed spatial strategy of the Preferred Options Local Plan states that the emerging Local Plan will continue with the delivery of key locations identified in the Central Lancashire Core Strategy and these will be the main focus for the initial years of the plan, following delivery of key infrastructure improvements in Preston and South Ribble as part of the City Deal.

4.3 In paragraph 3.4 of the Preferred Options Local Plan, it is stated that key strategic locations which have received planning permission and/or are allocated in the existing Local Plan will form the focus for initial delivery of housing and employment requirements in the initial stages of the plan. This includes the BAE Systems, Samlesbury Site, and recognition is given that this site will be the focus of delivery for the National Cyber Force Campus.

4.4 Policy Direction 2: Spatial Approach states (**our emphasis**):

*To achieve Central Lancashire Spatial Vision, the strategy will meet housing and development needs broadly maintaining the current urban structure of a connected grouping of towns and villages along key communication routes. Accordingly, the plan will:*

- *Continue to deliver growth areas of the existing local plan*
- *Complete the new urban extensions settlements in North West Preston, including the delivery of Cottam parkway*
- *During the course of the plan period, gradually rebalance the focus of housing development sites from Preston towards South Ribble and Chorley in line with infrastructure delivery*
- ***Minimise harm to the Green Belt except in South Ribble in the event where there is justification for a garden village or new settlement.***
- *Avoid development in floodplains*
- *Maximise the growth potential of Preston City Centre by continuing its long-term regeneration delivering jobs, homes, higher education and cultural facilities and environmental enhancements*
- ***Consider identifying a strategic area of growth linked to the Enterprise Zone and National Cyber Force at Samlesbury***
- *Further consider the role of Safeguarded Land and the Samlesbury/Cuerdale Growth Option*

- *Promote new high-quality economic sites at accessible locations, including consideration of the delivery of new strategic site in Chorley along the M65*
- *Propose development sites in accordance with the settlement hierarchy*

4.5 Logik Strategic Land is supportive of the proposed spatial approach outlined under Policy Direction 2, and endorses the Central Lancashire Authorities' approach of considering the release of Green Belt in South Ribble for a new Garden Village to help achieve its housing and employment land needs over the emerging plan period. It should, however, be clear and clarified that any new Garden Village should include the five plots of land forming the Cuerdale Employment Sites submitted as part of these representations.

4.6 A significant quantity of quality employment land located near to the Samlesbury Enterprise Zone and NCF is required to meet identified existing needs, as well as accommodate the substantial economically beneficial spin-off effects expected. Logik Strategic Land are supportive of the statement in Policy Direction 2 that a strategic area of growth linked to the Enterprise Zone and NCF at Samlesbury is required. The Cuerdale Employment Sites are located in close proximity to the Enterprise Zone and the location of the NCF and present an excellent opportunity to capture investment from businesses that have an inherent interest in locating close to the NCF campus in providing supply chain services and activities, creating a cluster of complementary businesses in the area. The proposed development on Plots 1-3 of the Cuerdale Employment Sites submitted as part of the outline planning application also includes a hotel, which could support the NCF to provide conference facilities, or provide a place to stay for employees living further away. Food and drink retail is also proposed as part of the scheme to provide future employees with places to eat throughout the working day, and for any passing trade on the A677.

4.7 It is acknowledged that the Preferred Options Local Plan outlines the longer term growth strategy for the period of time beyond the emerging plan to 2038. This is because the draft Preferred Options document acknowledges that the Central Lancashire Authorities are exploring the possibility of new settlements (example being a garden village), and therefore policies to facilitate new settlements should be set within a vision that looks further ahead (at least 30 years) to take into consideration the likely timescale for delivery. The draft document states that the Central Lancashire authorities consider that it is important to start exploring potential options for accommodating growth in the next Local Plan period but importantly also taking advantage of opportunities presented for this emerging plan period. It states (**our emphasis**):

*There is the potential for an **area of growth based around the A59 leading from Junction 31 of the M6 to the Enterprise Zone and National Cyber Force at Samlesbury...There is potential for***

***this locality to provide sector leading economic growth opportunities** and creating new associated communities. This opportunity could not only contribute beyond the plan period but **also has the abilities to come forward sooner if justified and needed.** Within this growth area a new sustainable independent settlement or Garden Village could be an option to accommodate future housing and economic needs. It is anticipated that a new settlement could contribute to housing and economic growth during the emerging plan period but also would provide supply way beyond too.*

4.8 As previously mentioned, no other site in Central Lancashire possesses the locational attributes of the Cuerdale Employment Sites and the wider Cuerdale Garden Village proposals, which are capable of supporting the economic growth potential stemming from the Samlesbury Enterprise Zone and NCF. As demonstrated by the submission of the outline planning application for Plots 1-3 of the Cuerdale Employment Sites, these plots are ready and available to come forward now. The additional 2 plots are capable of being delivered in the next 15 years within the emerging plan period, and as demonstrated later on in these representations, there is a pressing need for employment land above the proposed requirement suggested within the draft Preferred Options Local Plan. It is our opinion, therefore, that there is a justified need for the allocation of the Cuerdale Employment Sites and clear justification and evidence that this could be delivered within the proposed 15 year plan period.

## **Green Belt**

4.9 A Green Belt Designations Study (2022) has been prepared by LUC which will form part of the evidence base underpinning the emerging Local Plan's reformed Green Belt designation. The assessment provides a parcel-by-parcel analysis, with each parcel assessment split into two sections:

- A strategic assessment of the contributions of the parcel to the Green Belt purposes
- An analysis of key considerations with regard to potential harm resulting from the release of land within the parcel.

4.10 The analysis is based on the clearly defined purposes of including land within Green Belt in paragraph 138 the NPPF are as follows:

- Purpose 1: To check the unrestricted sprawl of large built-up areas
- Purpose 2: To prevent neighbouring towns merging into one another
- Purpose 3: To assist in safeguarding the countryside from encroachment
- Purpose 4: To preserve the setting and special character of historic towns
- Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

4.11 The Cuerdale Employment Sites fall entirely within parcel P14 of the Green Belt Designations Study. The ratings for the parcel's strategic contribution to the Green Belt purposes for Parcel P14 are shown below (extract from Table 4.1 of the green belt designations study):

Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Highest Contribution
P14	Limited/no	Limited/no	Significant	Limited/no	N/A	1 Significant

4.12 Table 4.1 above therefore demonstrates that the only contribution that Parcel P14 makes to the Green Belt is in regard to Purpose 3 – to assist in safeguarding the countryside from encroachment. Out of the three point scale of significant, moderate and limited/no contribution, P14 has been ranked as making a 'significant' contribution to purpose 3. The definition of 'Significant Contribution' in relation to Purpose 3 is classified as follows on page 68 of the study:

*"Significant Contribution – Open land use is not associated with the urban area and urbanising development within the parcel, within the inset settlements or beyond the Green Belt's outer edge does not have a significant influence."*

4.13 It is important to note however, that in paragraph 3.10 of the Study, it is stated that, *"Ratings typically reflect the fact that most parcels contain at least some open land which does not have a strong relationship with any built-up area and therefore make a strong contribution to Purpose 3."* It is also evident from Table 4.1 of the Study that nearly all parcels scored 'significant' in regard to purpose 3, with only 10 scoring 'moderate' out of the 86 parcels assessed overall.

4.14 The second part of the Green Belt Designations Study considers the potential harm resulting from the release of the land. The second part of each parcel assessment offers some consideration of the two principal factors that could influence the potential harm resulting from the release of land:

- The presence of areas within the parcel which, although still 'strategic' in scale, make a weaker contribution to the Green Belt purposes than the parcel as a whole. Typically, this is because part of the parcel has a stronger relationship with the urban area (and therefore its release may be less likely to be perceived as sprawl, or encroachment on the countryside etc).
- The existence of physical features within the parcel that could form a new Green Belt boundary that would limit the impact of release on the integrity of adjacent Green Belt land.

4.15 Page 41 of of Appendix A1 includes the full Parcel P14 assessment. The 'Key considerations with regard to potential harm to Green Belt purposes from substantial release of land' section of the parcel assessment reads as follows:

*"Safeguarding of the countryside from encroachment (Purpose 3) is likely to be the most significant consideration when determining the potential for release of land for development within this parcel. Most of the parcel is physically and visually well removed from inset development, and tree cover also minimises the urbanising influence of washed-over development Land to the southwest of Samlesbury Aerospace Enterprise Zone (map point A) has weak distinction from the urban area, given that there is no boundary feature at the urban edge, and dense tree cover around Huntley Brook to the south and west would provide strong alternative Green Belt boundaries. Similarly, land directly to the southeast of Samlesbury Aerospace Enterprise Zone (map point B) also has weak distinction from the urban area, with no boundary features to create distinction from the large scale development to the north, and the A677, which already forms the Green Belt boundary in the vicinity of the Enterprise Zone entrance road, would similarly form a boundary to any further expansion. Land slopes uphill eastwards towards residential development within Mellor Brook, which currently maintains some distinction between commercial and residential areas, but no land within the area contained by the Enterprise Zone, Mellor Brook and the A677 has strong distinction from urbanising development. The A677 forms a consistent boundary feature to the south of Samlesbury Aerospace Enterprise Zone and most of Mellor Brook, but there is linear residential development at Mellor Brook along the south side of the main road. Rising slopes to the south mark an increase in sense of distinction from the urban area, but there is flatter ground in between that has weaker distinction (map point C), where the harm of release would consequently be lower."*

4.16 As part of the Cuerdale Employment Sites outline planning application, a detailed assessment of the site's contribution to the defined purposes of including land in the Green Belt is set out. The includes an analysis of the potential harm caused by its release from the Green Belt against each of the five purposes of the Green Belt within the NPPF. The conclusion of the assessment correlates with the findings of the Green Belt Designations Study in that the only purpose that would be effected by the Proposed Development is Purpose 3, however, it robustly concludes that the site's in question would only pose moderate harm to Purpose 3. It is, therefore, Logik Strategic Land's strong consideration that that the level of harm is less than that stated in the Green Belt Study.

4.17 The conclusions of the harm to the Green Belt assessment as part of the outline planning application are as follows:

- Purpose 1: To check the unrestricted sprawl of large built-up areas – **no harm**
- Purpose 2: To prevent neighbouring towns merging into one another – **no harm**
- Purpose 3: To assist in safeguarding the countryside from encroachment – **moderate harm**
- Purpose 4: To preserve the setting and special character of historic towns – **negligible harm**
- Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – **no harm**

4.18 Although the above assessment relates to Plots 1-3 of the Cuerdale Employment Sites included in the initial outline planning application, the release of the further two plots from the Green Belt are also anticipated to only cause no more than moderate harm in regard to Purpose 3 in line with the conclusions of the outline application.

4.19 Logik Strategic Land therefore advocates that the Cuerdale Employment Sites should be removed from the Green Belt as they do not significantly contribute to the purposes of including land in the Green Belt as defined by the NPPF. In addition, as outlined in Table 6 below, there is a clear strategic case based solely on the first phase of the proposals submitted with the outline planning application that would outweigh any harm caused to the overall Green Belt.

Economic Value	Comments	Weight to be applied
<b>Job Creation</b>	A total of 2,268 net direct and direct jobs will be generated (on plots 1-3 alone) in the logistics and industry, office, retail	<b>Substantial</b>

and hotel sectors. Across all 7 plots the amount of jobs generated will be beyond this figure.

<b>Spend in the local economy</b>	Increase in employment rates across Central Lancashire will consequently lead to additional spend in the local economy	<b>Substantial</b>
<b>Gross Value Added</b>	The Cuerdale Employment Sites will produce a GVA of £122 million per annum on plots 1-3 alone. The additional 4 plots would generate a GVA beyond this figure.	<b>Substantial</b>
<b>Business Rates receipts</b>	Annual business rates of £5.5 million will be produced on plots 1-3 alone. The additional 4 plots would generate business rates beyond this figure.	<b>Substantial</b>
<b>Capturing market demand</b>	The sites will provide for the identified need of large, flexible B2/B8 floorspace to particularly help the logistics sector grow in Central Lancashire. The sites are in an advantageous location near the M6, and will be attractive to future occupiers	<b>Substantial</b>
<b>Addressing employment land requirements</b>	There is an identified employment land need over the emerging local plan period. The proposed development would boost the employment land supply position in a suitable location	<b>Substantial</b>
<b>Providing infrastructure to support the NCF</b>	Providing strategically located employment space, and the potential for hotel bedrooms for temporary staff,	<b>Substantial</b>

near the NCF to capture the spin-off effects of this significant investment

## Social Value

**Improvement in health and deprivation indicators** The proposed development will contribute to the economic prosperity of South Ribble and Lancashire which will in turn improve health indicators **Moderate**

**Creating a cohesive community** In the wider context of the Cuerdale Garden Village, the Cuerdale Employment Sites will provide places to work for this future residential population **Moderate**

**Increasing health and wellbeing** Providing places of work that are within walking and cycling distance from the future residents of the Cuerdale Garden Village. Providing Green Infrastructure and sensitively landscaped employment sites which will impact positively on future workers mental wellbeing. **Moderate**

## Environmental Value

**Sustainable design and location** BREEAM 'excellent' development, target net zero in Construction and an EPC A rating **Substantial**

Achieving above 10% biodiversity net gain

Provision of sustainable surface water drainage

<b>Promoting sustainable transport choices</b>	Providing walking and cycling infrastructure within the sites to promote sustainable modes of travel	<b>Moderate</b>
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*Table 6: Summary of Strategic Benefits of Cuerdale Employment Sites, Plots 1 - 3*

4.20 Logik Strategic Land notes that the proposed Green Belt policy – Policy Direction 3: Green Belt, is standard in its wording and has no objections. Based on these representations, however, it is strongly considered that there are clear, compelling, and strategic benefits in removing all five potential plots within the emerging Cuerdale Employment Sites from the Green Belt, as part of the emerging allocation for the wider Cuerdale Garden Village, within the current Local Plan process as they are clearly justified and needed.

## **Employment Land Development Needs**

4.21 Logik Strategic Land also wishes to question the assumptions made within the draft Local Plan concerning the employment land needs.

4.22 The Employment Land Development Needs within the draft Preferred Options Local Plan are based on a review of the Employment Land Study 2022. To derive the Economic Objectively Assessed Need (OAN) figure over the plan period, two models were considered; historic land take-up forecast and Employment based forecast. After a comparison of projections and the OAN figure each would produce, it was decided that the historic land take-up figure was the more robust model to use. Most notably, the historic land take-up figure produced a higher economic OAN figure over the emerging plan period.

4.23 As a result, the employment land requirements for the emerging plan period 2023-2038 are shown under draft Policy Direction 14 (Scale of Economic Growth). This states that Central Lancashire has an objectively assessed need for a minimum of 225 hectares of net additional employment land over the plan period. The following employment land requirements will meet this need:

- Chorley - 76.34 ha
- Preston - 71.06 ha
- South Ribble - 77.66ha

- 4.24 Page 57 of the draft Preferred Options Part One consultation document identifies that there is however an identified shortfall in employment land supply against the requirement, with South Ribble's further need over the plan period being 25.68ha. In regard to Chorley, a shortfall of 20.06ha was identified and in Preston a surplus of 0.25ha was identified.
- 4.25 It is noted however that paragraph 7.8 of the Employment Land Study states that the model used to generate the OAN are 'Policy Off' in that they make no allowance for any major public sector programmes which might generate jobs above the baseline (which would be 'Policy On' scenarios). Given that part of the emerging local plan's spatial strategy is to encourage growth at Samlesbury Enterprise Zone, and critically the acknowledgement of the substantial governmental investment in the National Cyber Force Campus, it is inconsistent with the emerging Local Plan's strategy to not have a 'Policy On' approach to the Economic OAN. Furthermore, paragraph 7.8 states that the 2017 and 2019 Studies incorporated 'Policy On' Scenarios considering the extra jobs estimated to be created by the Samlesbury Enterprise Zone and City Deal programmes in Preston and South Ribble. Logik Strategic Land therefore strongly advocates that the OAN should incorporate 'Policy On' effects of the Samlesbury Enterprise Zone, the outstanding City Deal programmes and the effects of the National Cyber Force Campus which are known to have a substantial economic impact on the Central Lancashire area and will create additional unmet employment land demand.
- 4.26 As mentioned in paragraph 7.20 of the Employment Land Study 2022, the OAN figures are a measure of local needs only, and therefore when working out the employment land shortfall, only realistic local supply should be included. That means, sites such as Cuerden and Samlesbury Enterprise Zone are not accounted for in the 'realistic local supply' as they are focussed on meeting inward investment requirements.
- 4.27 Taking the above same approach, The Employment Land Demand Report which was submitted in support of the Cuerdale Employment Sites outline planning application and is also appended to these representations, has undertaken a more recent assessment of realistic local supply as of December 2022 across the Central Lancashire Authorities and concludes that the following higher employment land shortfalls:
- **Chorley** - 72.87 ha need less 45.35 ha (realistic supply, local only) = 27.52 ha
  - **Preston** - 67.83 ha need less 42.77 (realistic Supply, local only) = 25.06 ha
  - **South Ribble** - 74.13 ha less 16.43 ha (realistic supply, local only) = 57.70 ha

- 4.28 On the basis of the critical analysis of the Central Lancashire's Authorities Employment Land Study Update 2022, Logik Strategic Land objects to Policy Direction 14 as the Objectively Assessed Need calculation underpinning the employment land requirements does not account for 'Policy On' factors which are integral to the Spatial Strategy of the emerging Local Plan. Therefore, the employment land requirements stated in Policy Direction 14 should be higher.
- 4.29 Logik Strategic Land also objects to the distribution of Employment Land Requirement figures shown on page 57 of the Preferred Options Local Plan consultation document, as these figures are not assessed against an up to date realistic local supply. These additional need requirements should be higher, as stated in paragraph 2.31 of these representations and as detailed in the appended Employment Land Demand Report.
- 4.30 Based on the above, it is considered that the Cuerdale Employment Sites, together with the Cuerdale Garden Village, are the best strategic location within the Local Plan area to meet the additional employment land needs that will arise from an underestimation of need, as well as a result of the investment in the Samesbury Enterprise Zone and the NCF. The fact that the employment land needs will be greater than stated within the Preferred Options Local Plan further strengthens the case for the release of both the Cuerdale Employment Sites and the Cuerdale Garden Village from the Green Belt immediately.
- 4.31 Logik Strategic Land are however supportive of the statement under paragraph 4.21 that in South Ribble, the gaps in employment land supply sites relate to larger B8 uses. The Cuerdale Employment Sites would help South Ribble Borough Council in particular to decrease its shortfall in large B8 uses.

## **Proposed Site Allocations**

- 4.32 Logik Strategic Land are pleased to see that the Cuerdale Employment Sites (plots 1-3) are included as a Preferred Growth Option as part of the wider Cuerdale Garden Village in the Preferred Options Local Plan. The initial site assessment is shown within the South Ribble Site Profiles, and it is titled Site Profile 26. Logik Strategic Land has no objections to the findings of the initial site assessment other than the stated proposed hectares of employment land should increase by 18.42 hectares to take into account of totality of the Cuerdale Employment Sites opportunity and the land interests of Logik Strategic Land included in these representations. The initial site assessment has concluded that the site is suitable, available and achievable. To support this conclusion, please see below additional details demonstrating the suitability, availability and achievability of the Cuerdale Employment Sites within the proposed plan period.

- **Suitable** – In the wider context of the Cuerdale Garden Village and the substantial inward investment planned at the Samesbury Enterprise Zone as a result of the National Cyber Force Campus, the Cuerdale Employment Sites are uniquely located to provide needed high-quality employment floorspace, particularly B2 and B8 uses. The sites are located nearby to Junction 31 of the M6, giving future occupiers convenient access to regional and national markets.
- **Available** – The Cuerdale Employment Sites are under the control of Logik Strategic Land who have a significant track record of bringing forward major strategic sites for development. Logik Strategic Land are committed to bringing forward the site at an early stage of the plan period, demonstrated by the submission of an outline planning application in December 2022. As such, it is clear that the site is available.
- **Achievable** – The draft Local Plan has undertaken an initial assessment of the site constraints has been undertaken which demonstrates that there are no significant technical constraints that would prevent or delay the Cuerdale Employment Sites from coming forward. This is clearly supported by the conclusions of the submitted outline planning application for the first plots to be delivered. In the context that the site is in a desirable location for employment land, within a Functional Economic Market Area that is experiencing a shortage of employment floorspace, the development of the site is considered to be entirely achievable early in the emerging Plan Period. A planning application has been submitted and presents the case for approval now with the clear benefits of the scheme outweighing any perceived harm caused.

4.33 The Cuerdale Employment Sites, as part of the wider Cuerdale Garden Village, have also undergone an Integrated Assessment. Logik Strategic Land has no objections at this early stage to the Integrated Assessment findings.

## 5. Comments on other aspects of the Preferred Options Local Plan (Part One)

- 5.1 In addition to the principle comments made already, Logik Strategic Land also wishes to make the following observations on the draft Local Plan.

### Vision and Objectives

- 5.2 Logik Strategic Land notes that the overall proposed vision within the CLLP Preferred Options Local Plan due to its strong economic steer for a more prosperous Central Lancashire by 2038 (**our emphasis**):

*'By 2038 the Central Lancashire economy will be transformed to be stronger, greener and cleaner. Our collective ambitions on climate change will be delivered, demonstrating our responsibilities to addressing the climate emergency and the use of resources. Inequalities will have been reduced with the benefits of growth being shared more equally, supporting improvements to people's health, and **ensuring fair access to good quality education and employment. High quality development**, coordinated with infrastructure, will have been maintained, and enhanced a strong and distinctive sense of place for existing and new opportunities. Our key environmental assets and qualities will have been protected and **be playing a key role in the resilience of the area's economy** and environment and in our cultural heritage. Public transport services, cycling and walking links, digital connectivity and electrified transport systems will all be playing a fundamental role in ensuring better access of **good quality jobs**, homes and facilities.'*

- 5.3 Strategic Objective 5: Economic Prosperity solidifies this vision further and states the objective to (**our emphasis**):

*'**Provide a range of employment and economic growth opportunities in sustainable locations.** Prioritising community wealth building, and building on the infrastructure improvements within City Deal, to supporting the growing population and attracting inward investment, **promoting Central Lancashire as the economic centre for Lancashire and recognising its strategic importance within the wider Lancashire region and beyond.**'*

- 5.4 The strategic employment land opportunity that the Cuerdale Employment Sites, and the wider Cuerdale Garden Village, will clearly help Central Lancashire realise its vision and economic objective in the emerging Local Plan. It is recommended, however, that the a strategic objective relating to the delivery of the NCF and the A59 Growth Corridor should be included in the next iteration of the Local Plan to reiterate its unique and critical importance to the delivery of the Local Plan objectives.

## Policy Direction 8: Climate Change

5.5 Policy Direction 8: Climate Change reads as follows:

*To achieve the collective goal of the Councils being net zero by 2030, all new development will be required to contribute to mitigating and adapting to climate change.*

*Planning applications must be accompanied by an Energy Statement demonstrating how carbon emission savings have been maximised and Building Regulation requirements exceeded.*

*All planning applications for major new development (10 or more dwellings or 1,000m<sup>2</sup> or more non-residential floorspace must also be accompanied by a nationally recognised Whole-Life Cycle Assessment, proportionate to the scale of the development, demonstrating that whole life cycle carbon savings have been maximised.*

*From 1st January 2030 onwards new development resulting in the creation of 1 or more dwellings or 500m<sup>2</sup> or more non-residential floorspace must be net zero. If this cannot be fully achieved on site, the carbon shortfall should be provided either through a cash contribution to a carbon offset fund or off-site, provided that an alternative proposal is identified and agreed by the Council.*

5.6 Logik Strategic Land generally supports the wording of Policy Direction 8. However further information is required regarding the proposed carbon off set fund i.e. what price (£) per tonne of CO<sub>2</sub> will be applied.

## Development Policies for a Prosperous Economy

5.7 Policy Direction 17: Economic Growth Sector Strengths states the following:

*'Development of STEM sector strengths and of other sectors with economic growth potential in Central Lancashire will be supported and, where appropriate, protected and enhanced. These include:*

- *Advanced engineering and manufacturing, including aerospace and aviation;*
- *Construction;*
- *Digital*
- *Energy*
- *Financial, professional and business services (subject to compliance with the sequential*
- *test for main town centre uses);*
- *Health and life sciences;*
- *Logistics (transport and storage);*
- *Low carbon economy business and low carbon generation.'*

5.8 The Cuerdale Employment Sites is a mixed-use employment-led scheme of up to 170,000sqm of B2/B8 uses, and has the potential to offer suitable accommodation to future occupiers in exactly these STEM sectors that Policy Direction 17 is targeting. Logik Strategic Land supports the wording of Policy Direction 17 and considers that the strengthening of the wider Cuerdale Garden Village allocation, and acknowledgement of its critical role in delivering the proposed targets with it the plan period, will significantly help to meet this policy objective.

## 6. Conclusions

- 6.1 These representations are made on behalf of Logik Strategic Land in response to the consultation on the Central Lancashire Preferred Options Local Plan. The key requested changes are as follows:
- There is a clear and compelling justification for the strategic importance and role that the Cuerdale Employment Sites, and the wider Cuerdale Garden Village, can play in delivering the objectives of the draft Local Plan. It is, therefore, important that the allocation for the new Garden Village include the full opportunity presented by **all** of the land that Logik Strategic Land has control over and be recognised as a critical and key component that can be delivered as part of the new Local Plan.
  - All five plots of the Cuerdale Employment Sites should be released from the Green Belt and included as part of the draft allocation for the Cuerdale Garden Village. The level of harm (in which only purpose 3 would be moderately harmed) from releasing the sites from the Green Belt would not undermine the principle purposes for including land in the Green Belt and are should also be considered against the clear economic, social and environmental benefits that the development of the sites' would bring.
  - The economic 'Objectively Assessed Need' should be higher and be 'Policy On' so that the expected economic growth forthcoming from the City Deal programmes, Samlesbury Enterprise Zone and National Cyber Force Campus is accounted for.
  - As shown by the Employment Land Demand report appended to these representations, the level of realistic, local supply of employment land across the Central Lancashire Authorities is much lower than stated within the Employment Land Study 2022 commissioned by the Council's. Consequently, the identified employment land shortfalls for all three Central Lancashire Authorities is higher than that stated in the Preferred Options Local Plan. The Cuerdale Employment Sites, and the wider Cuerdale Garden Village, are uniquely placed to help meet this additional demand.
- 6.2 The Cuerdale Employment Sites, as part of the wider Cuerdale Garden Village are within the identified Strategic Growth Option and are ideally located nearby to the substantial planned investment at Samlesbury Enterprise Zone and the National Cyber Force campus. No other site in Central Lancashire possesses the locational attributes of the Cuerdale Employment Sites and the Garden Village. The Cuerdale Employment Sites will provide high quality employment land floorspace and provide premises for occupiers that have an inherent interest in locating close to the Samlesbury Enterprise Zone and

NCF campus in providing supply chain services and activities, creating a cluster of complementary businesses in the area.

- 6.3 There is a clear, pressing need for additional employment land over the emerging Local Plan period. An outline planning application has already been submitted for the first three plots that comprise the Cuerdale Employment Sites. All 5 plots submitted as part of these representations are capable of coming forwards in the next 15 years and therefore should be allocated to help the Central Lancashire Authorities fulfil its economic needs over the emerging Local Plan period.
- 6.4 Realising the potential of this critical economic location requires employment space, providing the infrastructure needed to enable future investments in the area to realise their full effect. There is a pressing and evidenced market need for more business space with strategic access to the M6 and the NCF campus presents an opportunity for Central Lancashire to capture investment from businesses that have an inherent interest in locating close to the NCF campus in providing supply chain services and activities, creating a cluster of complementary businesses in the area.
- 6.5 Within the Central Lancashire Preferred Options Local Plan main consultation document, a series of questions are posed. The answers to the majority of these questions can be found earlier on in these representations, however, a brief response to these is provided below.

**Question 1 – Do you agree with the Spatial Vision for Central Lancashire as set out in Section 2?**

**Question 2 – Do you agree that the proposed Strategic Objectives in Section 2 are what we need to do to deliver our vision and address the challenges we face in Central Lancashire**

- 6.6 Please see response in paragraphs 5.1-5.4 of these representations.

**Question 6 – Do you agree with the Spatial Strategy for Central Lancashire which is in Section 3**

- 6.7 Please see Section 4 of these representations. Logik Strategic Land is particularly supportive of the inclusion in the spatial strategy of a Garden Village in South Ribble and a strategic area of growth linked to the Enterprise Zone and National Cyber Force campus at Samlesbury.

**Question 10 – Would the Cuerdale Garden Village proposal provide a suitable approach to accommodating growth beyond 2038**

- 6.8 These representations clearly set out the justification and immediate need for the allocation and delivery of the Cuerdale Garden Village, including the land in control of Logik Strategic Land, to meet the Local Plan objectives within the proposed plan period.

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# Appendix III      Review of Employment Land Evidence (Wisher Consulting)

# Central Lancashire Local Plan Reg 19 Publication – Review of Employment Land Strategy & Supporting Evidence

Client : Logik Developments

Date : April 2025

Status : Final Report

## WISHER CONSULTING



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# 1. Introduction

- 1.1 Wisher Consulting has been commissioned by Logik Developments to review the robustness of the employment land policies in the Regulation 19 Publication Draft of the Central Lancashire Local Plan, and the evidence that underpins these policies.
- 1.2 More specifically, the scope of the review has been the following documents:
- The Regulation 19 Publication Draft of the Central Lancashire Local Plan produced by the Central Lancashire authorities of Chorley, Preston and South Ribble (the Councils), and earlier versions of this document.
  - The various employment land evidence base documents produced by the BE Group between 2017 and 2025.
  - Other employment land evidence, in particular the January 2025 Strategic Housing and Economic Land Availability Assessment (SHELAA)
- 1.3 This review examines issues relating to both employment land need and employment land supply. It has been undertaken by Darren Wisher of Wisher Consulting. Darren is an experienced economist and was previously Managing Director of both Regeneris Consulting and the UK economics consulting arm of Hatch.
- 1.4 Logik Developments has site interests in the vicinity of the Samesbury Enterprise Zone in South Ribble. The sites do not feature in the Regulation 19 Plan but were referenced in the previous Regulation 18 Preferred Options document of December 2022, within a “strategic area of growth” linked to the Enterprise Zone and the National Cyber Force (NCF) at Samesbury. Given the location of Logik’s sites this review focuses mainly on employment land issues in South Ribble.

## 2. Employment Land Need

- 2.1 The BE Group have been retained by the Councils since 2015 to advise on employment land issues for the Central Lancashire Local Plan. They produced four comprehensive written reports in 2017, 2019, 2022 and most recently in February 2025.

### Flawed Changes

- 2.2 The BE Group use a largely consistent methodology to assess employment land need throughout their first three reports in 2017, 2019 and 2022, with their preferred method being a projection based on past gross employment land take up.
- 2.3 The BE Group make two very curious changes to their approach for the purposes of their February 2025 report, which has informed the Regulation 19 Plan, seemingly at the final hour. The two changes have the effect of substantially reducing the Objectively Assessed Need (OAN) for employment land in both South Ribble and Chorley. In South Ribble the reduction in the total need for employment land is 20 hectares, with total need for the plan period reducing from 77 hectares in the 2022 report to 57 hectares in the 2025 report – a 25% reduction.
- 2.4 The two changes made by the BE Group, which are interconnected, are deeply flawed:
- The first change is to move the OAN projection method from one based on gross past take up to one based on net past take up. The gross take up method was used in each of the 2017, 2019 and 2022 reports, but net take up in 2025. The net approach subtracts employment land losses each year from gross take up and uses the resultant number to project forward. The flaw with this approach is that these losses invariably relate to sites that were long since vacated and have normally been tested thoroughly, and over many years, as to their future suitability for employment land. The sites that are lost are, in the main, historic sites that have nothing to do with gauging current and future levels of need. Netting off these losses just serves to artificially deflate the true measure of current/future need.
  - The second change, put in place because of the desire to incorporate net take up, is to reduce the period on which past take up is measured from circa 30 years to 13 years. Losses are only measured more recently which mean that the BE Group has had to deviate from its previous approach of charting past take up over an extended period. This change matters because the reduced 13-year period is more influenced by short term trends and shows lower take up rates than the longer period. In extrapolating past trends, a longer rather than shorter run of data should always be used as it is statistically more robust.
- 2.5 The changes made by the BE Group are partially offset by the inclusion of a 7.5% vacancy rate target within the 2025 methodology, but even with this allowance the drop in projected need is still a very substantial 25% in South Ribble. The two changes, and primarily the move from a gross to net take up projection, lead to a 20 hectares reduction in assessed need in South Ribble.

### BE Group's Standard Approach

- 2.6 The changes outlined above run counter to how the BE Group generally conduct their assessments. The BE Group have undertaken over 50 employment land reviews in the last 15 years, according to their own marketing materials.
- 2.7 Wisser Consulting has seen many of these reports and estimate that virtually all of these previous reports, maybe even 100%, use the gross take up method and adopt a long time series for the purposes of measuring take up trends.

- 2.8 This is evidenced by a sample of recent BE Group employment land reports found online<sup>1</sup>. All of these examples utilise gross rather than net take up data to make future projections. There is no suggestion in any of these reports from the BE Group that the net take up approach should be used ahead of the gross take up approach.
- 2.9 The track record of the BE Group in always using gross take up makes the recent shift in methodology in Central Lancashire even more curious.

### No Change in Guidance

- 2.10 There has been no change in guidance that could explain the changes the BE Group have made.
- 2.11 The guidance is still that contained in Para ID: 2a-027-20190220 of the Planning Practice Guidance on Housing and Economic Needs Assessments<sup>2</sup>. It does not specify the need to make adjustments to past take up to account for losses.
- 2.12 In the absence of any external reasons for the methodological changes, either in the form of changed guidance or a changing philosophy amongst the BE Group in their other studies, it can only be assumed there was some internal influence bespoke to this study that caused the shift in approach.

### Inconsistencies

- 2.13 The BE Group only make their methodological changes in respect of South Ribble and Chorley. The approach for Preston remains unchanged and largely consistent with previous approaches in the earlier BE Group reports.
- 2.14 The Plan is an integrated plan for the whole of Central Lancashire, and there is no justification for different methodologies in different component areas. The approach to assessing housing need is consistent across all areas and so should be the approach for employment land.
- 2.15 Figure 2.1 (over page) shows very clearly the implication of the change in methodology for South Ribble compared to Preston. In Preston there is no significance difference in the projected need across all four BE Group reports. The same is true for South Ribble *apart* from the very last study.

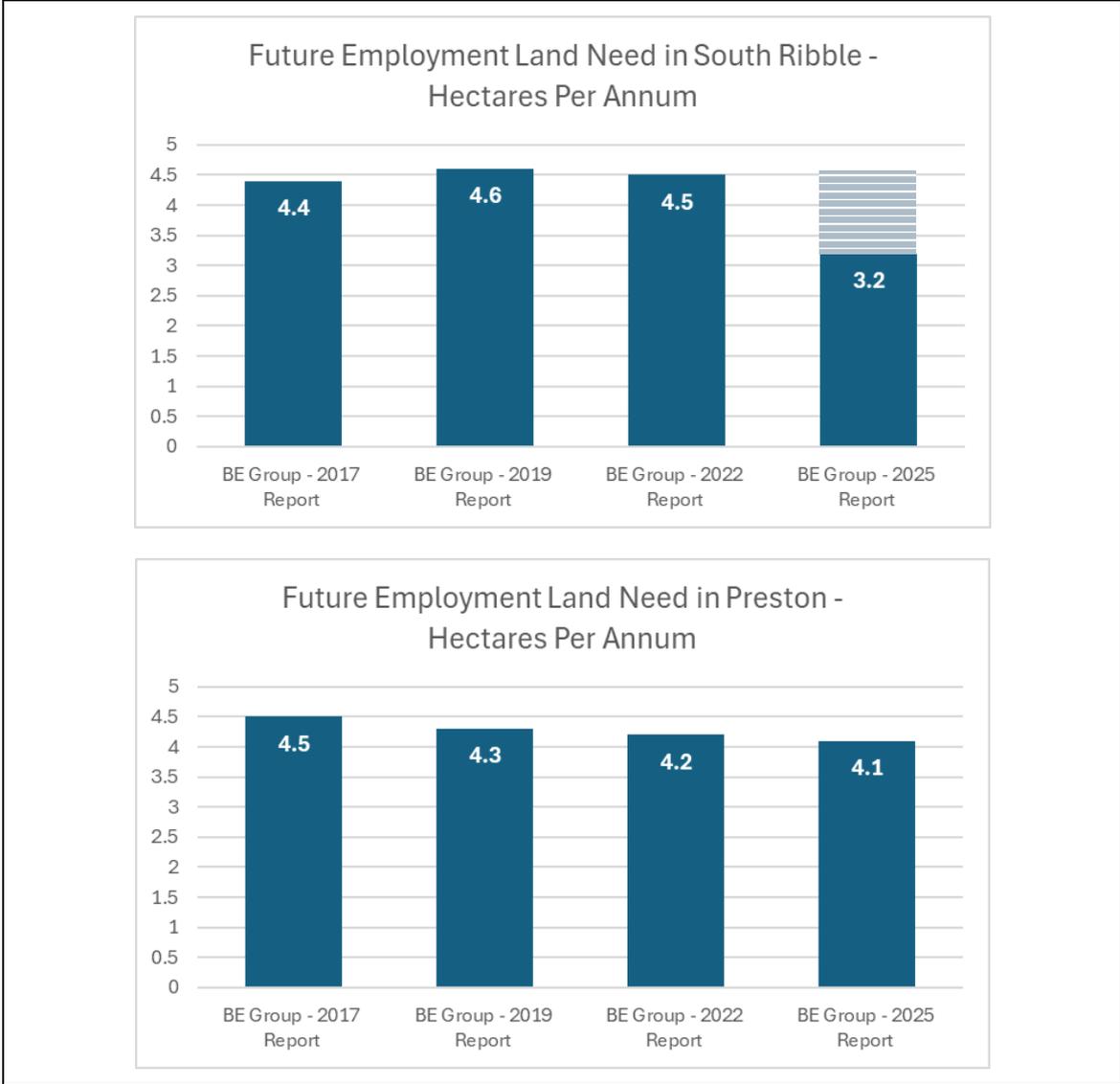
### Overall

- 2.16 There is no sound reason for this 25% reduction in employment land need in South Ribble in the February 2025 report.
- 2.17 Both of the methodological changes should be reversed and the need for 77 hectares of employment land in South Ribble in the plan period, as evidenced in the 2022 BE Group report, should be reinstated as a minimum figure.
- 2.18 The reintroduction of this higher need figure is even more important in the context of the imminent arrival of the National Cyber Force (NCF) at the Samlesbury Enterprise Zone (see Section 4 of this review). If anything, the need figure should be increased relative to the 2022 BE Group assessment and not reduced.

<sup>1</sup> These being Amber Valley (2021), Denbighshire (2019) Derby (2023), St Helens (2019), Warrington (2021),

<sup>2</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Figure 2.1 : Comparison of BE Group Assessments for South Ribble & Preston



Source : Wisher Consulting/BE Group Studies. Hatched bar shows the flawed 25% reduction in South Ribble.

## 3. Employment Land Supply

3.1 This review has identified errors, inconsistencies and weaknesses in the Councils’ assessment of supply. The implication of these various weaknesses is that the Publication Plan, even on the reduced level of need identified in the previous section of this report, is predicated on a shortfall in employment land provision.

### South Ribble Supply

3.2 In South Ribble, the Councils’ assessment of need is for 6 hectares of office land and 51 hectares for industrial and warehousing land in the period 2023-2041 – so a total of 57 hectares as set out in the previous section of this review. Points are made in the previous section about the flaws in this need assessment. The supply comparison below is undertaken against the Councils’ assessment of need. The shortfalls that are evidenced are even more significant under the higher level of 77 hectares need that this review advocates.

3.3 The Publication Plan states there will be allocations of 61.3 hectares of employment land in South Ribble<sup>3</sup>.

3.4 50 hectares of this claimed new supply, equivalent to 82% of the total, is on one site - the Cuerden Strategic Site. It is evidently never advisable to be so reliant on one site in a particular area. It will expose the Central Lancashire Local Plan to considerable risk and a broader portfolio is better to ensure both choice and competition and to guard against risk. This need for a broader portfolio is even more necessary in the context of the Cuerden Strategic Site which was allocated in the previous Plan and never delivered.

3.5 In addition, the Councils have overestimated the scale of supply at the Cuerden Strategic Site:

- The claimed 50 hectares includes 16 hectares of expansion land which is under separate ownership. It is public knowledge that all of this expansion land has recently been sold to the NHS who are proposing to use the site for a new replacement hospital for the Royal Preston Hospital – which is clearly outside the definition of employment land.
- The 50 hectares includes land, approximately 4 hectares, that is required for strategic landscaping and access arrangements as set out in the site masterplan. The 4 hectares of land should be netted off in line with standard practice in employment land assessments.
- The approved site masterplan<sup>4</sup> for the remaining 30 hectares shows that 20% of the proposed land/floorspace (i.e. 6 hectares) is for non-employment land uses, such as leisure and retail. This should also be deducted from the claimed employment land supply.

3.6 The above adjustments mean that the actual amount of employment land that could be delivered at the Cuerden Strategic Site is circa 24 hectares and not 50 hectares.

3.7 A further 9.2 hectares of the claimed new supply (15% of the total) is on Land north of Lancashire Business Park. The BE Group state very clearly in their February 2025 assessment that “the ownership of this site means it is likely to be held as expansion land for adjacent Leyland Trucks” rather than being available in the market (see page 141). They also state that...“bridging the River Lostock would be an additional cost to any development on this site, which could generate viability issues” (see page 141).

3.8 If the correct figure of 24 hectares for the Cuerden Strategic Site is used and the 9.2 hectares of land north of Lancashire Business Park does not come forward then the Councils’ estimated new supply drops significantly from 61.3 hectares to 26 hectares. 26 hectares is only 45% of the Councils’ assessment of need and only 34% of the higher need figure of 77 hectares that this review advocates.

<sup>3</sup> This is the sum of supply listed on page 88 and page 90 of the Publication Plan. The figure of 61.3 hectares also appears in the January 2025 Strategic Housing and Economic Land Availability Assessment (SHELAA).

<sup>4</sup> See Design and Access Statement of the 2022 planning application.

- 3.9 There will be some additional supply from existing permissions on non-allocated/previously allocated sites, but this is understood to amount to circa 10 hectares of supply at most and will not meet the deficits identified above. In addition, very little evidence is provided by the Councils about the quality of this supply on non-allocated/previously allocated sites.

#### Sites outside South Ribble

- 3.10 There are further weaknesses in the Plan's supply assessment beyond South Ribble.
- 3.11 Supply in Preston, and indeed for the whole plan area, is heavily dependent on 'Policy SS3 - Strategic Site Allocation Preston West', which is shown in the Publication Plan as delivering 63 hectares of employment land.
- 3.12 As recently as their February 2025 report the BE Group assessed this site as only a 'maybe' for inclusion in the Plan. The site scored only 56 out of 100 in the BE Group's assessment and was given scores of zero out of 10 on both the criteria relating to 'constraint free' and 'available'. Delivery on this site is clearly far from certain and if it does have potential then this would appear to be only in the longer term.
- 3.13 The BE Group report of February 2025 went on to say of the site (see pages 132/133):
- "Although the land sits in a relatively strong location, there are a range of practical issues which would need to be addressed before an employment allocation could be considered" (emphasis added).
  - "Any scheme is likely to be housing led and deliverability needs first to be considered in the context of residential uses firstly".
- 3.14 The combination of the Plan's inaccuracies in measuring supply in South Ribble and the overly ambitious assertions in relation to Preston West means the portfolio of supply needs to be boosted significantly through additional allocations.

#### Logik Development's Sites

- 3.15 The Councils went through a series of Call for Sites exercises from 2018 onwards. Specifically, four invitations to submit sites were made between late 2018 and early 2023.
- 3.16 Logik submitted information relating to three development plots on Land West of Samlesbury, Lancashire to the process. These sites collectively will make a considerable positive contribution to meeting employment land need and are perfectly located to meet market needs connected to the National Cyber Force (NCF) - see next section.
- 3.17 Logik can see no evidence that their sites have been evaluated at all, either by the BE Group or via any other process. They appear to have been "parked" according to the January 2025 Strategic Housing and Economic Land Availability Assessment (SHELAA) due to their Green Belt status. The only reason they were parked/ignored appears to be the last-minute flawed reduction of need and the exaggerated supply assessment as set out above.

#### Overall

- 3.18 The assessment of employment land supply within the Publication Plan is inaccurate and significantly exaggerates the scale of supply in the plan period. There is a substantial shortfall of supply even under the reduced level of need. Logik's sites at Samlesbury are desperately needed, both to meet this general need and specifically to help capture the full benefits of NCF.

## 4. National Cyber Force Opportunity

### The Opportunity

- 4.1 It was announced in October 2021 that the National Cyber Force (NCF) HQ would be established at the Samlesbury Enterprise Zone. NCF was established a year earlier as a joint MoD and GCHQ partnership to help keep the UK safe from hostile state activities, terrorists and criminals threatening national security via offensive cyber operations. The new NCF HQ project is apparently known inside government as “GCHQ 2” given its likely scale and significance.
- 4.2 The then leader of South Ribble Council described the announcement as “great news for South Ribble and one of the single biggest infrastructure investments we will have ever had” and added “It will create thousands of jobs and is a massive vote of confidence in the skilled workforce we have in our borough”.
- 4.3 A recent January 2025 report to the Lancashire County Council Cabinet<sup>5</sup> sought funding for a Cyber Innovation Hub at the Samlesbury EZ and stated:
- “The future presence of the National Cyber Force in Lancashire creates a once in a generation opportunity to accelerate economic growth and regeneration. This move is forecast to generate up to 3,000 jobs in the County, as well as causing transformational economic uplift through increased contracts, relocation of leading organisations, and demand for the necessary skills that enable these operations”.
  - “As evidenced in a recently commissioned economic impact study, the total £5bn National Cyber Force investment over the next decade could leverage a further 1,500 indirect jobs, with salaries in the associated occupations being almost twice the current Lancashire average”.
- 4.4 It was agreed at the Cabinet meeting that circa £13 million of public funding be directed to the new Cyber Innovation Hub. Lancashire County Council are clearly gearing up for the significant opportunity that NCF presents. NCF will apparently open its first facilities on site in mid-2025.
- 4.5 It is right that partners are seeking to secure the wider benefits of NCF as significant clustering is likely to occur. A report produced in 2020 “The Gloucestershire Cyber and Digital Sector Impact Study” by Hatch Regeneris found that in addition to the main GCHQ campus the district of Cheltenham also contained:
- A further 59 active cyber businesses.
  - A concentration of cyber businesses that was 11 times the national average.
- 4.6 These same clustering effects can and will happen in South Ribble with the arrival of NCF, subject to site availability.

### Space at Samlesbury EZ

- 4.7 All available reports appear to suggest that the National Cyber Force’s direct operations will take up most of the remaining space at the Samlesbury EZ. For example:
- The 2025 BE Group report (p137) states in relation to the Samlesbury EZ: “The National Cyber Force Campus will now take up a high proportion of the remaining land and it is not clear what, if any, land will remain to meet further requirements”.
  - A recent Statement of Common Ground between the Central Lancashire Authorities and Lancashire County Council states: “LCC believes that the Enterprise Zone in Samlesbury is likely to reach capacity

<sup>5</sup> Report can be found here : [Public Pack - LCC Cabinet, 16/01/2025 14:00](#).

early in the plan period and suggest that they are aware of significant demand from specialised businesses looking to co-locate with existing businesses in the area”.

- 4.8 Clearly what is needed, given the limited future headroom on the EZ site, is a series of well-connected employment allocations in addition to the Samlesbury EZ but close to it that can capture businesses connected to NCF.
- 4.9 Logik’s sites are perfectly placed to capture this spin off trade, and far better placed to capture this trade than other allocated sites in the Publication Plan.

#### Publication Plan Treatment of NCF

- 4.10 The Publication Plan shows very little appreciation, and certainly no firm proposals, with regard to capturing the positive spin-off opportunities emerging from the new National Cyber Force Campus at the Samlesbury EZ.
- 4.11 As currently configured the Publication Plan is largely silent on how the Central Lancashire/South Ribble economy will leverage the “once in a generation opportunity” of NCF.
- 4.12 The BE Group’s evidence base reports have made no qualitative assessment of the ability of allocated sites to meet demand connected to NCF. This qualitative dimension to the site assessment process is critical.
- 4.13 As the recent Statement of Common Ground between the Central Lancashire Authorities and Lancashire County Council states:
- “LCC considers that in addition to meeting the total need in numerical terms there is a need to provide sites of the right kind in the right place including those which are suitable for supporting specialised sector growth and innovation in the medium to longer term” (para 5.16) (emphasis added).
- 4.14 The Statement of Common Ground between the Central Lancashire Authorities and Lancashire County Council also states at para 5.13: “The Central Lancashire area hosts significant sector strengths which have the potential to grow and develop new, nationally significant high-value capabilities in digital, cyber, technology, knowledge-based industries and advanced engineering and manufacturing. In order to realise these opportunities, site allocation and assembly is critical in providing a strategic pipeline to respond to demand”. (emphasis added).
- 4.15 Despite this statement, there is no evidence that the Councils have in fact gone through a thorough quantitative and qualitative process to determine the adequacy of their site allocations to meet demand connected to NCF. Had they gone through this process then they would have very quickly come to the conclusion that the portfolio of proposed supply is lacking – both quantitatively and qualitatively – and that additional allocations are required.

#### Overall

- 4.16 The Publication Plan has completely failed to provide sites that are capable of capturing the opportunities emerging from the NCF campus. The Councils are seemingly positioning NCF as a longer-term issue, and largely ignoring it within the Publication Plan, when the reality is that it is happening now. Additional allocations, specifically catering for the NCF supply chain, are urgently required.

## 5. Conclusions

5.1 The main conclusions of this review are as follows:

### Employment Land Need

- The latest evidence that underpins the Publication Plan does not appear to provide an impartial and objective assessment of employment land need.
- Employment land need in South Ribble has been reduced, down 25% from 77 hectares in previous Council assessments to 57 hectares in the Publication Plan, due to a last-minute change in methodology. The change in methodology is deeply flawed, is not in response to any change in guidance and is completely at odds with how the Councils' advisors (BE Group) typically approach need assessments.
- Bizarrely, the Councils have changed the approach for South Ribble and Chorley but not for Preston. It is simply not defensible to have a Plan with different approaches in different component parts of the plan area.
- It appears the level of need has been artificially adjusted down to try and avoid any tough Green Belt considerations in South Ribble.
- The higher level of need of 77 hectares in South Ribble should be reinstated as a minimum, especially given the transformational impact of the new National Cyber Force Campus which has yet to be properly accounted for (see below).

### Employment Land Supply

- The assessment of employment land supply in South Ribble is inaccurate and significantly exaggerates the scale of supply in the plan period. There is a substantial shortfall of supply even under the reduced level of 57 hectares of need. With the proper level of need reinstated, the shortfall is even greater.
- The Publication Plan purports to provide new supply of 61 hectares in South Ribble. 50 hectares of this claimed new supply (or 82%) is in one site - the Cuerden Strategic Site. It is never advisable to be so reliant on one site in a particular area. It exposes the Plan to considerable risk, especially when said site was allocated in the previous Plan and never delivered.
- The claimed 50 hectares of employment land supply at Cuerden is wholly inaccurate:
  - 16 hectares has been sold to the NHS for a new hospital.
  - 4 hectares is required for strategic landscaping and access arrangements.
  - Of the remaining 30 hectares some 20% (6 hectares) is shown on the approved site masterplan for non-employment land uses, such as leisure and retail.
- The real level of employment land supply at the Cuerden Strategic Site is circa 24 hectares.
- A further 9 hectares of claimed new supply in South Ribble (15% of the total) is on land north of Lancashire Business Park. The Councils' assessment states very clearly that this land is being held as expansion land for adjacent Leyland Trucks rather than being available in the market, and that there are bridge infrastructure requirements to open up the site.
- If the correct figure of 24 hectares for Cuerden is used and the 9 hectares at Land north of Lancashire Business Park does not come forward then the level of new supply in South Ribble drops significantly from the claimed 61 hectares to 26 hectares.

- There are also weaknesses in the supply portfolio elsewhere in the Plan. For example, there is a significant reliance on the claimed 63 hectares of new employment land at Policy SS3 - Strategic Site Allocation Preston West. As recently as February 2025, the BE Group classed this site as only a 'maybe' for inclusion in the Publication Plan and stated "although the land sits in a relatively strong location, there are a range of practical issues which would need to be address before an employment allocation could be considered".
- The portfolio of new supply needs to be boosted significantly through additional allocations.

### The National Cyber Force Opportunity

- The Publication Plan shows very little appreciation, and certainly no firm proposals, with regard to capturing the positive spin-off/supply chain opportunities emerging from the new National Cyber Force campus (NCF) at the Samlesbury EZ.
- This is despite the project being described widely and publicly in South Ribble as both "a once in a lifetime opportunity" and "one of the single biggest infrastructure investments we will have ever had". The NCF campus itself will take up most of the remaining space at the Samlesbury EZ with little space left for capturing supply chain businesses.
- There is no evidence that the Councils have gone through a thorough quantitative and qualitative process to determine the adequacy of their proposed site allocations to meet spin-off demand connected to NCF. Had they gone through this process then they would have very quickly come to the conclusion that the portfolio of proposed supply is lacking both quantitatively and qualitatively.
- What is needed is a series of well-connected employment allocations, located near to the Samlesbury EZ, that can capture supply chain businesses connected to NCF – but the plan offers nothing in this regard.

### The Logik Developments Sites

- The Logik Developments sites at Samlesbury will collectively make a considerable positive contribution to meeting both (i) general employment land needs and (ii) specific occupier demand related to NCF.
- There is no evidence that the Logik sites have been evaluated at all, despite them being repeatedly submitted to the Councils.
- The Logik sites appear to have been inappropriately "parked". The only reason they have been parked/ignored is seemingly the last-minute reduction in need and exaggerated supply assessments, as set out above.

# WISHER CONSULTING

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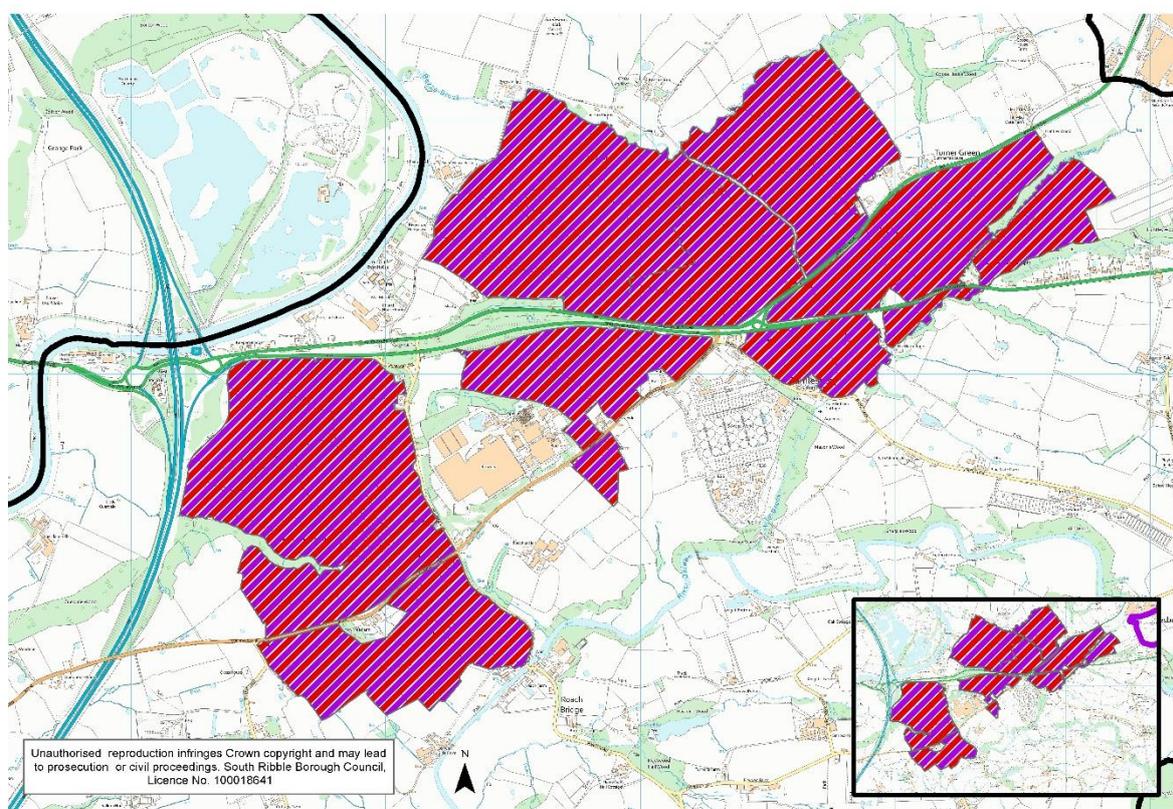
# Appendix IV      Cuerdale Garden Village (Site Profile 26)

# Site Profile 26

## Site Details

<b>Allocation Reference</b>	SR/GO1, SR/GO2
<b>SHELAA Reference(s)</b>	19S361 (19S107, 19S322)
<b>Local Authority</b>	South Ribble Borough Council
<b>Site Name</b>	Cuerdale Garden Village
<b>Settlement</b>	Samlesbury
<b>Ward</b>	Samlesbury and Walton
<b>Size (Ha)</b>	Growth option phase 1=107.5, phase 2= 186.22
<b>Current Use</b>	Greenfield

## Location Map



## Preferred Option

<b>Selected as Preferred Option</b>	Growth Option
<b>Proposed Allocation</b>	Mixed Use
<b>Proposed number of dwellings</b>	1300
<b>Proposed hectares of employment land</b>	91.92
<b>Proposed hectares for other uses</b>	N/A

## Site Assessment

### Overview

Existing planning permission?	No, Planning permission to be determined, 07/2022/00451/OUT.
Suitable	Yes
Available	Yes
Achievable	Yes

### Constraints

Site has topological issues, possible contamination and is within an HSE risk zone for hazardous installations/pipes. The site is also a Biological Heritage Site with ancient woodland and Tree Protection Order(s).

### Highways/Transport

A Central Lancashire Highways and Transport Masterplan is being prepared by LCC. As part of this work, the impact of the preferred allocations on the highways network will be assessed and appropriate mitigation measures identified.

### Utilities

The site has access to all utilities. Site at risk of sewer flooding which will need to be carefully considered in the design and master planning process for any development at this site. The site promoter will be required to engage with United Utilities. Site at risk from reservoir flooding. A detailed assessment will be undertaken. Site is located near to a wastewater treatment works which could affect the principle of the development, the layout or the need for mitigating measures at the wastewater treatment works.

### Flood Risk

Level 1 SFRA Strategic Recommendation D - site-specific FRA required as a minimum

### Heritage

Amber – On the basis of the information currently held in the HER the proposed allocation site either contains a known site of archaeological interest, but of a local or regional significance (i.e. a non-designated heritage asset) and therefore is not considered likely to be a constraint to development, or the allocation is considered to have a potential to contain previously unknown archaeological deposits by virtue of its location, close proximity to a site of known archaeological interest, or its size (c.10ha.). The site could be put forward for allocation, but any planning application to develop the site will need to be accompanied by an Archaeological Desk Based Assessment and/or the results of an archaeological field evaluation. The development will in all likelihood require a level of as yet unknown archaeological mitigation, which might take the form of preservation in situ, or by record, depending on the significance of the features encountered.

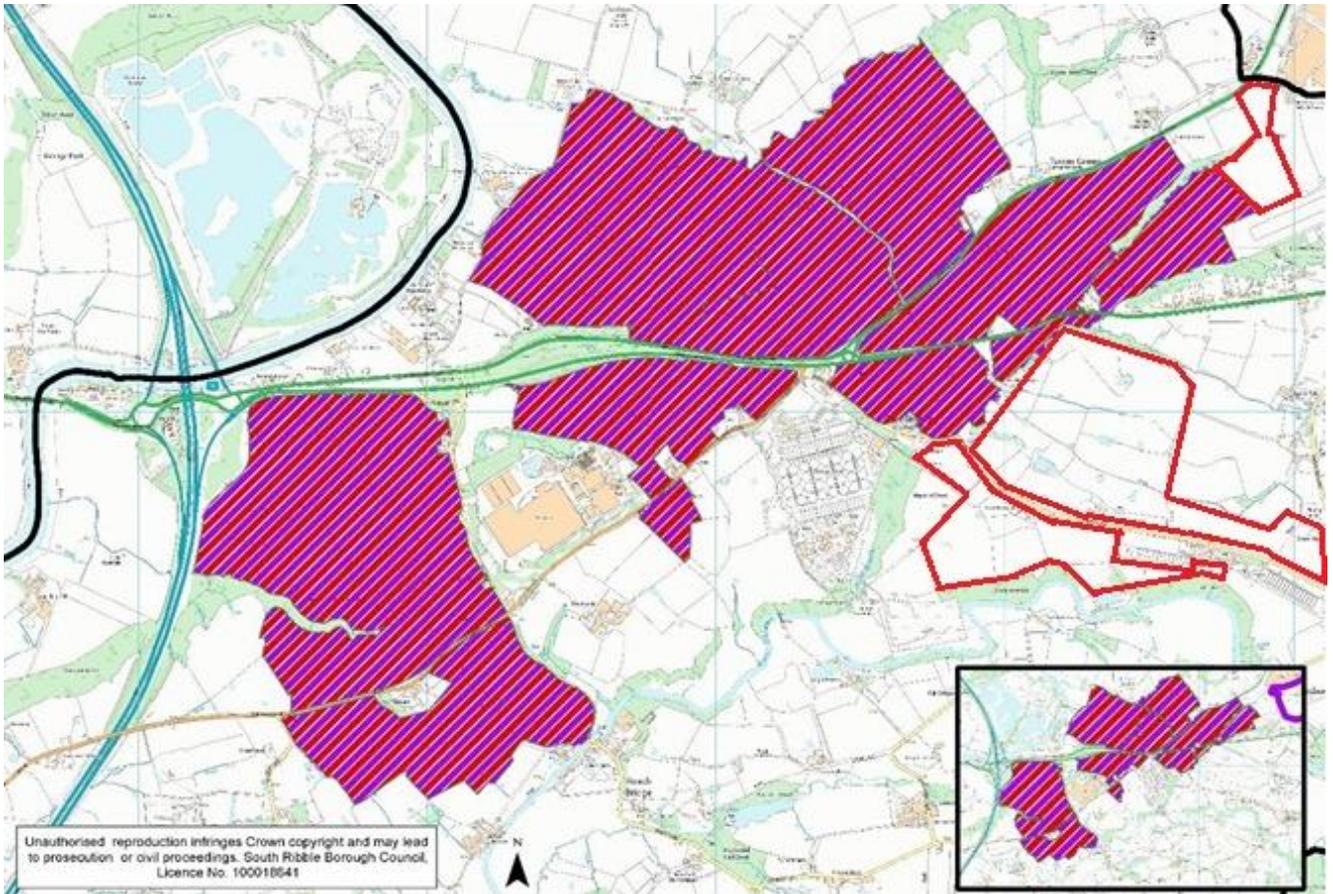
### Sustainability Appraisal Summary

Site displays numerous possible positive effects including sustainable transport, health and economy. Other minor negative effects include social infrastructure and air quality. Additionally, there are significant negative effects on flood risk with other significant results uncertain. The site has been subject to a level 1 SFRA which did not identify any risk that cannot be mitigated and will be subject to a level 2 SFRA

### Habitats Regulations Assessment

A Scoping Report has been prepared which identifies the European sites that have the potential to be affected by the Local Plan. The next stage of the HRA will screen all the preferred allocations to identify if any are likely to have a significant effect on the conservation objectives of the European sites. If any significant effects are identified an Appropriate Assessment will be undertaken to assess the effects in more detail and identify ways to avoid or minimise them.

# Appendix V Proposed Extent of Strategic Site Allocation at Cuerdale



## Proposed Extent of new Strategic Site Allocation at Cuerdale

Note that the Hatched Area was the boundary of the "Cuerdale Garden Village Site Profile" (Site Profile 26) in the Preferred Options - Part 1 draft CLLP, with the Logik's Additional Land Land Interest Shown in Red.

