



Central Lancashire Local Plan Publication Draft (Regulation 19) Consultation Response

Prepared on behalf of Maple Grove Developments

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Appendices

Appendix 1: Land at Flensburg Way Development Statement

Document Tracker					
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1. Introduction and Summary

- 1.1 Hive Land & Planning on behalf of Maple Grove Developments, welcome the opportunity to comment on the Central Lancashire Local Plan – Publication (Regulation 19) Consultation.
- 1.2 This response is provided following initial dialogue between Maple Grove Developments and South Ribble Borough Council on the emerging Local Plan and subsequent representations to the Central Lancashire Issues and Options (February 2020) and Preferred Options (2023) consultations.
- 1.3 The focus of this representation is the promotion of Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH, also known as 'Land at Flensburg Way' ('The Site'), for employment purposes.
- 1.4 As background, Montague Evans Consultants, on behalf of the previous landowner of The Site submitted a representation to the Central Lancashire Call for Sites in 2018 / 19. This representation confirmed that The Site was suitable for development for Class B industrial and warehousing uses and set out numerous good reasons why the Council should consider the identification of the site as an Employment Allocation. The Call for Sites Reference is CLCFS00414 and the SHELAA Reference is 19S119. The arguments in that submission are fully supported by Hive Land & Planning and our client Maple Grove Developments.
- 1.5 The site was identified as a Preferred Employment Allocation in South Ribble in the Central Lancashire Local Plan Preferred Options (2022) (Reference: SR/EP1.3) however the proposed allocation status has been withdrawn and this is explored in further detail through the representations. Further information and context is provided at Section 5 of this representation and in the Development Statement included at Appendix 1.
- 1.6 Maple Grove Developments are concerned with the lack of economic growth ambition identified through the consultation document which does not align with the wider aspirations and strategies across Lancashire. There is a significant shortfall of employment land supply identified in policies EC1-6 and ultimately potential site allocations which would support the economic growth strategy in a sustainable and suitable manner (including Land at Flensburg Way) have been excluded due to their current Green Belt status, despite no comprehensive Green Belt review having been undertaken.

- 1.7 Furthermore, there are concerns that the consultation is not transparent or fully justified due to lack of clarification on the relevant NPPF and evidence base documents which have been omitted from the consultation material.

2. Economic Growth Agenda

- 2.1 The national Government has committed to kickstarting economic growth through a focus on reforming the planning system to deliver increased housing growth and support significant infrastructure project delivery, regional growth through investment devolution and reform alongside enhanced support for business through a 10-year Industrial Strategy, which is intended to drive innovation and investment in new technology and science by making Britain a clean energy superpower.
- 2.2 More locally, the Lancashire region is recognised as having the second-largest economy in the North West with a population of over 1.5 million people and a Gross Value Added (GVA) of £40 billion¹. The economic landscape is defined by strengths in advanced engineering & manufacturing, nuclear energy, cybersecurity, artificial intelligence, and sustainable industries.
- 2.3 The devolution deal for Lancashire Combined County Authority, initiated by Lancashire County Council, and the two unitary councils of Lancashire; Blackpool and Blackburn with Darwen, is predicated on delivering economic regeneration, innovation-led growth and net zero ambitions with £20 million of funding from central government provided to support projects aligned with these aspirations. Funding was directed to Samlesbury Enterprise Zone, Blackpool Enterprise Zone and the Innovation Quarter in Blackburn.
- 2.4 In February 2025, the Lancashire Growth Plan (2025-2035) was published by the Combined County Authority (CCA) for public consultation, seeking to power innovation to drive economic growth across the region². It outlines the regions economic priorities in order to transform Lancashire into a global leader in innovation, inward investment and economic resilience, as set out below:
- **Sector Development & Growth:** Realise the full potential of Lancashire's competitive economic strengths and business base.
 - **Innovation Excellence:** Maximise the economic value of Lancashire's centres of research and innovation excellence and globally competitive business clusters.

¹ ONS Population Estimates – Local Authority based by five year age band. NOMIS, 2021A

ONS, Regional gross value added (balanced) by industry: all ITL regions, 2024

² The Lancashire Growth Plan: <https://lancashire-cca.gov.uk/sites/default/files/2025-03/Lancashire%20Growth%20Plan%20consultation%20version.pdf>

- **Skills for Growth:** Refocus Lancashire's approach to skills provision, ensuring it is responsive to business needs and demands and to enable inclusive growth.
- **Business Growth & Enterprise:** Strengthen and refresh Lancashire's business growth hub (Boost), in targeted areas, and improve our strategic capacity to compete for new investors and occupiers.
- **Releasing Local Growth Potential:** Create the right conditions for business and investor growth and unlock new development and employment opportunities across Lancashire through the development of a Lancashire Infrastructure Strategy and related plans.

2.5 It is considered that the Central Lancashire Local Plan, as currently proposed, does not support the national nor Lancashire economic growth agendas through the proposals and aspirations of the CCA, particularly in creating the right conditions for business and investor growth and to unlock new development and employment opportunities in the region. This will be explored further through this representation.

3. Legal Compliance

Overview

- 3.1 This section now considers the key legal requirements which the Central Lancashire Local Plan must meet in the preparation of the Local Plan.

Evidence Base Availability

- 3.2 The submission of a Local Plan for Examination in Public (EiP) should be supported by, a full and complete, proportionate evidence base and supporting Regulation 22(c) statement, with the guiding principle being that only evidence that informs the content of the Local Plan, should be submitted. However, it is critically important that a Local Planning Authority (LPA) ensures that adequate evidence base is submitted alongside the Plan to safeguard against avoidable delays in the EiP process³.
- 3.3 Regulation 22 highlights in 22(1)(e) in respect of the submission of documents for Examination, that such supporting documents as in the opinion of the LPA are relevant to the preparation of the Local Plan. However, to assist LPA's, PPG identifies a range of evidence base documents which are likely to be required within Chapter 61, whilst Chapter 54 also identifies that it is important for LPA's to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that robust transport evidence base may be developed to support the preparation and/or review of that Plan to facilitate its approval.
- 3.4 Local planning authorities must also make available each of the proposed submission documents that they intend to submit to the Planning Inspectorate for EiP to enable representations to come forward that can be considered at examination, under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.5 Furthermore, it must be noted that the primary purpose of an evidence base is to support and justify what is in the Local Plan with the plan avoiding assertions of fact that are not supported by evidence, nor should evidence be collected retrospectively in an attempt to justify pre-conceived conclusions⁴. This will

³ Planning Inspectorate: Procedure Guide for Local Plan Examinations - Evidential Requirements: <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations#section-1-before-submission>

⁴ PPG Reference ID: 61-038

be addressed further in relation to the Sustainability Appraisal/Integrated Assessment and the employment site selection processes undertaken in the development of the CLLP.

- 3.6 It considered by Maple Grove Developments, that the CLLP Publication version is not supported by a proportionate, nor robust, evidence base as numerous key evidence base documents are omitted from the consultation material. Therefore, should the Local Plan proceed to submission for EiP, it would not meet the legal requirements set out in The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.7 Critically, whilst page 10 of the Infrastructure Development Plan (IDP) suggests that transport evidence has been commissioned to support the Local Plan, the published evidence base does not include highway and transport evidence which robustly undertakes an assessment of the transport implications in developing the Local Plan and therefore, the assumptions identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA), IDP and subsequent policy choices within the CLLP cannot be considered to be justified.

Sustainability Appraisal / Integrated Assessment

- 3.8 The three Central Lancashire Authorities commissioned LUC to produce an Integrated Assessment (IA) for the CLLP, which comprises a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EIA).
- 3.9 It is considered that the IA, particularly the SA, fails to meet the requirements of National Planning Policy and Guidance, the 2004 Regulations and the Directive and as a result the Local Plan cannot be considered to be an appropriate strategy for the purposes of the NPPF Paragraph 36.
- 3.10 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, LPAs must subject proposals in development plan documents to an SA and prepare a report on the findings of the appraisal. The SA must incorporate the legal requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 and associated directive. The Directive sets out the relevant requirements and considers that the preparation and adoption of a Local Plan should be subject to an environmental assessment as defined in Article 2b), this will include the preparation of an 'environmental report' as defined by Article 2c) and involves information required in Article 5 and Annex I.
- 3.11 Chapter 11 provides guidance on the process and requirements of undertaking an SA, noting:

“A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met.”

3.12 Before it states:

“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.*

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”

3.13 The role of the SA is primarily to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve the fundamental vision and objectives of the Local Plan. Therefore, the SA process should clearly justify its policy choices in meeting the development needs of the area and be clear from the results of the assessment why some policy options have been progressed or rejected. The SA should undertake a comparative and equal assessment of each reasonable alternative.

- 3.14 Fundamentally, if the evidence base for key matters such as, highways and transport, is not available then it is not possible for the SA to clearly justify its policy choices in meeting development needs of the area alongside undertaking a comparative and equal assessment of each reasonable alternative.
- 3.15 Furthermore, the Council has placed greater importance on avoiding Green Belt release through the Local Plan preparation process rather than directing development to the most sustainable locations and away from areas at risk of Flood Risk. This will be explored in further details in relation the employment land site selection process, however, the Council should have determined the most sustainable development options before determining whether there were exceptional circumstances to justify Green Belt release.
- 3.16 Ultimately, the Council has placed greater importance on avoiding Green Belt release than meeting recognised employment land needs and directing development to the most sustainable locations.
- 3.17 In any case, it cannot be determined that the most suitable sites have been selected as the evidence base has not been published to support a full and comprehensive assessment of the spatial strategy options and site selection processes. Therefore, it is considered that the IA, particularly the SA, fails to meet the requirements of National Planning Policy and Guidance, the 2004 Regulations and the Directive and as a result the Local Plan cannot be considered to be an appropriate strategy for the purposes of the NPPF Paragraph 36.

4. Central Lancashire Local Plan Publication (Regulation 19)

- 4.1 The section that follows explores the CLLP publication document in further detail, providing specific comments primarily in relation to economic growth and employment land. The CLLP fails to support economic growth across the authority areas, including by failing to set a clear economic vision which positively, and proactively encourages sustainable economic growth aligned to the wider ambitions of the Lancashire authorities as identified in the Lancashire Growth Strategy and corresponding devolution deal.

Relevant National Planning Policy Framework for the Purposes of Plan-Making

- 4.2 Annex 1 of the National Planning Policy Framework (NPPF) outlines how policies of the NPPF should be implemented for the purposes of plan-making. Paragraph 234 of the latest NPPF, published in December 2024, identifies that the policies in the 2024 NPPF iteration apply from the 12 March 2025 other than where one or more of the following criteria apply:

“a. the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need;

b. the plan has been submitted for examination under Regulation 22 on or before 12 March 2025;

c. the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020;

d. the local plan is for an area where there is an operative Spatial Development Strategy and the local plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025; or

e. the plan deals only with minerals and/or waste matters and has reached Regulation 19 on or before 12 March 2025; or has been submitted for examination under Regulation 22 on or before 12 March 2025.”

- 4.3 It is understood that the CLLP has been prepared under the transitional arrangements set out through Paragraph 234 (a). However, the CLLP document does not identify which NPPF it has been prepared to comply with, the Statement of Representation Procedure and Statement of Fact (Regulation 19) does not provide any further information and the consultation homepage, hosted on citizenspace, provides a link to the NPPF (December 2024). However, Paragraph 3.8 of the Integrated Assessment of the CLLP Final

Report identifies that the Plan is being prepared under the NPPF (December 2023) and therefore utilising transitional arrangements set out in Annex 2 of the NPPF (2024).

- 4.4 Procedurally there is concern that the Regulation 19 consultation has therefore not been transparent, comprehensive or allowed fully for effective engagement with the general public, businesses and key stakeholders⁵.

Employment Land Requirements and Supply

CLLP Employment Land Provision

- 4.5 The CLLP is not considered to meet the test of soundness in relation to economic growth and employment land supply as it is not positively prepared, justified, or effective, nor does the CLLP present ambition in helping to support the economic growth across the wider County.
- 4.6 Policy EC1 'Scale of Economic Growth' identifies the objectively assessed need (OAN) for employment land across each authority area for 'offices' and 'industrial/warehouse'. The following table sets out the identified OAN figures and provides a total for the Central Lancashire area:

LPA	OAN Offices (hectares)	OAN Industrial/Warehouse (hectares)	Combined employment OAN (hectares)
Chorley	6.48	34.97	41.45
Preston	6.00	68.43	74.43
South Ribble	5.76	51.23	56.99
Total	18.24	154.63	172.87

- 4.7 Criterion 4 of Policy EC1 sets out that 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 to deliver economic growth.

⁵ PPG Reference ID: 61-034

It is important to highlight that the total site area for employment across mixed-use allocations in Chorley (Policy EC5) is incorrect, and should state, '12.66ha'.

- 4.8 Concerningly, the total land supply identified across all employment and mixed-use allocations in Policies EC2-6 is 154.84ha and therefore does not meet the minimum requirement for additional employment land over the plan period of 173ha, as set out in Policy EC1.
- 4.9 Therefore, the CLLP fails to support economic growth across the authority areas including by failing to set a clear economic vision which positively, and proactively encourages sustainable economic growth having regard to Local Industrial Strategies and other local policies for economic development and regeneration in line with Paragraphs 85 and 86 of the NPPF (2023). Furthermore, the employment land requirements in Policy EC1 identify the quantum of land required to address each employment land type (i.e. offices or industrial/warehouse). However beyond outlining the use class to be accommodated at each employment site allocation there is no information in the Local Plan identifying the supply breakdown for each employment land type and this is considered necessary to understand whether all types of identified employment needs are being met in full.
- 4.10 Although the NPPF (2023) does not set out a requirement for LPAs to undertake a review of Green Belt boundaries during plan preparation, it is considered that exceptional circumstances exist to justify the release Green Belt land for employment development due to the failure of the CLLP to meet the employment land requirements over the plan period and the corresponding economic growth agenda which the authorities have signed up to through the Lancashire Combined County Authority devolution deal alongside the corresponding economic growth aspirations within the Lancashire Growth Strategy (February 2025).

Economy/Employment Land Evidence Base

- 4.11 The 2022 Employment Land Study identified that in South Ribble there was a Objectively Assessed Need (OAN) for an additional 77.6 hectares of Employment Land between 2021-2038, with the figure for the wider Central Lancashire region amounting to 225 hectares across the same period. Critically, 51.23 hectares of the overall South Ribble employment land OAN was in relation to industrial/warehousing.
- 4.12 It is noted that there was a significant shortfall of 25.68 hectares in the supply of employment land in South Ribble to meet this need and therefore additional employment land allocations should have been sought.

- 4.13 The Study found that the stock of employment land is falling and that there is a lack of readily available land in Central Lancashire. It also concluded that the Farington area is recognised to be a suitable location for new employment allocations.
- 4.14 The Employment Land Study – Land Supply and OAN Update (2024) undertakes a revised OAN calculation for the period 2023-2041. This OAN calculation produces an employment land need of 172.87 hectares, some 52 ha lower than that the 2022 study, when a Central Lancashire OAN of 225 ha was identified.
- 4.15 The changes reflect a revised assessment period and updates to data provided by Cambridge Econometrics. It is noted that the methods used in the 2024 update are ‘Policy Off’, making no allowance for any major public sector programmes which might generate jobs above the baseline and do not reflect the drive for economic growth across Lancashire. However, the 2017 and 2019 Employment Land Studies were ‘Policy On’ seeking to estimate the number of jobs to be created by the Samlesbury Enterprise Zone and City Deal Programmes. Therefore, the OAN reflects an unambitious, baseline position of potential employment needs and does not seek to drive economic growth across the region.
- 4.16 The updated report does however confirm that the Central Lancashire market remains strong evidenced by recent commencements/completions of several private sector B2/B8 schemes with the demand project to remain strong. Importantly, it continues to highlight that,

“against demand, and even with recent completions of new schemes, the subregion has a limited supply of premises to meet forward needs, some 8.8 months of forward industrial supply by units, 6.5 months by floorspace, based on past average rates of take up per year. Against total stock, vacancy rates across Central Lancashire are well below 5 percent, which also suggests supply shortages.”

- 4.17 Similarly, in relation to warehousing it is noted that,

“logistics growth will continue to be focused on prime locations on the motorway corridors, supply shortages will encourage the take up of good secondary locations as well.”

- 4.18 Regardless of the lack of ambition incorporated into the employment land OAN methodology, it is reiterated that Policies EC2-6 do not identify enough employment land to meet the identified OAN of 173ha. This is further exacerbated when the proposed allocations in South Ribble are scrutinised further.

- 4.19 Firstly, Land north of Lancashire Business Park is allocated for 6.92ha of employment land. However, the site is bisected by a watercourse and it is highlighted within the Employment Land Study (2024) that this would require bridging to make use of the full site which may generate viability issues and therefore, the realistically available and deliverable land on the allocation is significantly less. This also does not consider the significant flood risk associated with the site which may reduce the developable area further.
- 4.20 Secondly, Cuerden is allocated for 50 hectares of employment land under allocation reference (EC6.1). It is noted that Maple Grove and Lancashire County Council have achieved an outline consent for a mixed-use scheme across a partial area of the allocation site, which supports the suitability and deliverability of the site as a whole (Reference: LCC/07/2022/00044). However, Table 44 of the Employment Land Study (2024) identifies that the realistically available employment land supply on the site is only 31.93ha.
- 4.21 The SHELAA site assessment profile (Site Profile 8) highlights that there is a proposed employment land capacity of 48.69ha at Cuerden, however this does not align with the information set out above. Therefore, further clarification on the available employment land supply at the Cuerden allocation (Policy Reference: EC6.1) is required.
- 4.22 The additional land within the allocation boundary but outside of the aforementioned planning consent, is controlled by a third party, who is not a developer, outside of Maple Grove or Lancashire County Council's ownership and there is therefore no certainty that this area will be delivered.
- 4.23 Therefore, as highlighted in the previous section of this representation, further deliverable, employment land allocations are required across the CLLP area and particularly in locations identified as suitable and sustainable for employment development such as, 'Farington Moss: Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH' which was previously allocated in the Preferred Options document under reference: SR/EP1.3).
- 4.24 It is evident that exceptional circumstances exist to release land from the Green Belt to meet employment land requirements in full and support the economic growth aspirations of Lancashire.

Employment Site Selection

- 4.25 The site selection process undertaken is summarised through the SHELAA site profiles and Appendix 4 of the Employment Land Study (2024). There are concerns regarding the robustness of the site selection process and that ultimately, the Council has placed greater importance on avoiding Green Belt release rather than meeting recognised employment land needs and directing development to the most sustainable locations.
- 4.26 The SHELAA profile for Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way (SHELAA reference: 19S119) notes that the site has been withdrawn as an employment allocation due to '*sufficient employment provision has been allocated outside the Green Belt*'. Yet, as discussed throughout this representation, Policies EC1-6 do not allocate sufficient employment land supply to meet the identified OAN.
- 4.27 Therefore, it cannot be considered to be positive, effective nor justified to withdraw preferred allocations, such as Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way (SHELAA reference: 19S119) when deemed to be suitable and show '*significant positive effects for the economy*' alongside the Plan outlining a shortfall in employment land supply.
- 4.28 Furthermore, the Employment Land Study (2024) identifies that the Site is deliverable, concluding:
- "The site comprises unconstrained greenfield land on a main road location. There are no strong barriers to delivery here and a site some 400 metres to the south, Farington Park, has been successfully developed speculatively for larger B2/B8 uses over the last two years..."*
- 4.29 Additional testing of employment sites was undertaken in the Employment Land Study, providing a score out of 100 in relation to 'qualitative attractiveness to the market and their likely deliverability, including consideration of some of the practical barriers they may face to development'. The methodology is set out at Appendix 3, with a full schedule of scoring identified in Appendix 4 of the Employment Land Study (2024).
- 4.30 It is unclear as to why 'planning status' is part of the site selection scoring methodology nor the rationale for the 'points' system which has been allocated. Particularly given that the scoring methodology also

separately assesses the availability of the site to be developed within different time scales ranging from 0-1 years to 10+ years.

- 4.31 In any case, Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way (SHELAA reference: 19S119) scores higher than a number of proposed employment allocations in terms of both deliverability and market-led sub totals. This emphasises that the Council has placed greater importance on avoiding Green Belt release than meeting recognised employment land needs and directing development to the most sustainable, *and deliverable*, locations.

5. Land at Flensburg Way

- 5.1 Maple Grove Developments are promoting Land at Flensburg Way ('The Site'), for employment purposes through the CLLP. The section sets out additional context and information regarding the deliverability and sustainability of the site for employment development, a Development Statement is also set out at Appendix 1 of this representation.
- 5.2 The Site extends to 11.84 hectares and is in single ownership, located near Farington Moss in South Ribble. It is broadly triangular in shape, bound by Flensburg Way (A582) across the south and Penwortham Way to the west. Farington Household Waste Recycling Centre is situated beyond the southern boundary of the Site boundary and fronts onto the roundabout that connects Flensburg Way with Penwortham Way.
- 5.3 The Site itself is formed of flat agricultural land, with field boundaries defined by hedgerows, scattered trees and ditches within the Site. The boundaries of the Site are largely contained by mature trees which have the effect of limiting any views to or from the south and west of the site. The Site is therefore contained by strong defensible boundaries on all sides. Flensburg Way will provide the primary means of access onto the Site. However, there is also the potential for a secondary access for the site to be provided onto to the south and west of the site towards Goldcrest Avenue and Tank Roundabout (Flensburg Way / Penwortham Way / Goldcrest Avenue) through the wider A582 improvements that are being proposed by LCC.
- 5.4 As background, Montague Evans Consultants, on behalf of the previous landowner of The Site submitted a representation to the Central Lancashire Call for Sites in 2018 / 19. This representation posited that The Site was suitable for development for Class B industrial and warehousing uses and set out the numerous good reasons why the Council should consider the identification of the site as an Employment Allocation. The Call for Sites Reference is CLCFS00414 and the SHELAA Reference is 19S119. The arguments in that submission are fully supported by Hive Land & Planning and our client Maple Grove Developments.
- 5.5 The site was identified as a Preferred Employment Allocation in South Ribble in the Central Lancashire Local Plan Preferred Options (2022) (Reference: SR/EP1.3) however, the proposed allocation status has been withdrawn.

Deliverability of The Site

- 5.6 The NPPF requires that sites being promoted for allocation within Development Plans must be deliverable, and it is clear that the Site is highly deliverable. The Site is greenfield, is reasonably flat, regular in shape and in agricultural use. There are no significant constraints to delivery such as ground contamination, flood risk etc and as such, no abnormal costs are anticipated. The planning application for the neighbouring Waste Recycling Centre, which is now operational, considered ecological matters in detail and no issues were identified. Given the findings of this application and given that The Site is currently in agricultural use, no arboriculture or ecological constraints are anticipated.
- 5.7 The Site is in the single ownership of MGD who are a developer with an excellent track record of delivery. There are no known legal restrictions, covenants, clawbacks or ransoms which affect The Site. As such there are no 3rd party interdependencies related to the Site which could delay its delivery. MGD as landowner is fully committed to bringing the Site forward for employment-led development, along with ancillary and complimentary roadside uses at the earliest practical opportunity. Once the emerging Local Plan has reached an advanced stage of the process, MGD would generally commence the planning application work in order to be in a position to submit an application at the point of adoption. Based on previous experience of promoting sites of a similar size and typology, it takes approximately 18 months between submitting a planning application and beginning construction on the Site. It therefore is anticipated that The Site will come forward within the first 0-5 years of the plan.
- 5.8 Conservatively, The Site can accommodate 35,000 sqm of development, with related access, loading, parking and manoeuvring. The Site can accommodate a range of unit types and sizes to fulfil demand from across different economic sectors. There is a direct access point from the existing highway network. Development of the Site, through a comprehensive masterplanning exercise, will ensure that proposals are entirely compatible with and preserve the amenity of occupiers of neighbouring properties. The Site is of a sufficient size to ensure that appropriate mitigation through design and landscaping could be achieved to ensure that development of the Site would not cause amenity issues.
- 5.9 There are a number of existing employment sites and proposed development sites around Farington. Development of smaller light industrial units on The Site could provide accommodation to support larger-scale employment uses in the area. The modest scale of the Site combined with the lack of major infrastructure

needed to bring the site into active employment use means that it is capable of being delivered to meet this identified need in the short term.

Sustainability of the Site

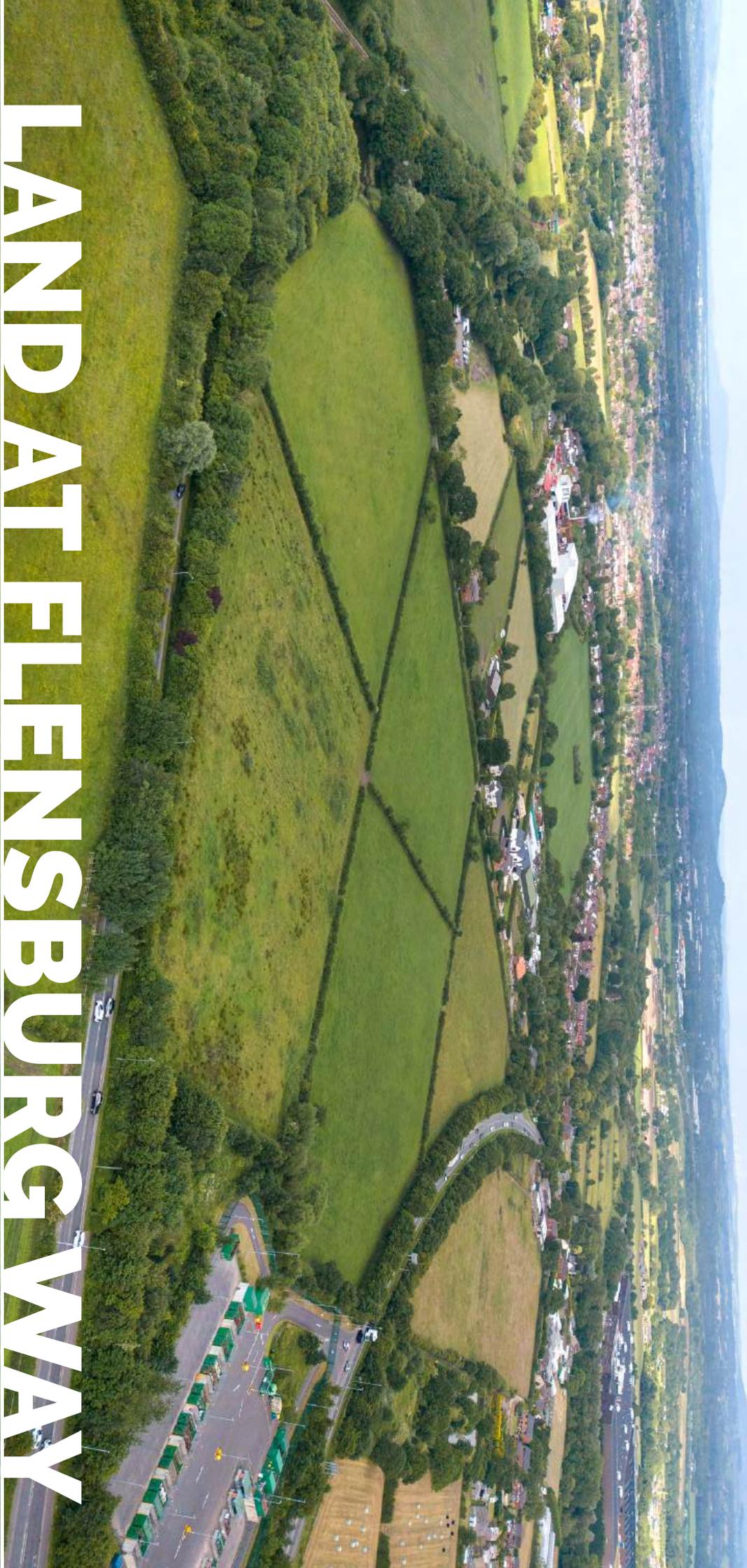
- 5.10 The Site is located in Farington, which is a sustainable location for the identification of employment sites. The Site would be well placed to meet part of the projected shortfall in employment space during the plan period, given its location to both motorways and labour force.
- 5.11 The Site is highly accessible as it lies on the local strategic road network, and it is just a 5 minute drive east to Junction 29 of the M6 and junction 1 of the M65. The town of Leyland is located just over 3km to the south of the site and other South Ribble settlements are in close proximity such as Lostock Hall, Penwortham, Bamber Bridge, Farington and New Longton. Beyond this immediate area is the city of Preston (8km north) and the town of Chorley (13km south). In respect of connectivity, Lostock Hall train station is located 2km to the north east of the Site and provides regular daily and direct services to a wide range of destinations including Preston (10 minutes), Blackburn (20 minutes) and Burnley (49 minutes). The short connection to Preston then provides access to other locations, including Wigan, Bolton, Blackpool and Lancaster. The Site is therefore highly accessible from a wide range of destinations.
- 5.12 There are a mix of uses in evidence in the surrounding area. The Site is located in proximity to the nearby established employment sites including Lancashire Business Park, Leyland Business Park and Stanifield Business Park as well as Cuerden strategic site. The allocation of The Site for employment land could therefore accommodate supply chain opportunities which are likely to be generated, keeping economic growth benefits within the local area. The Site provides an opportunity for further investment in the area and is likely to be attractive to a range of local employers and inward investors.
- 5.13 The allocation of The Site for employment will create opportunities for a range of employment opportunities which will support economic objectives relating to social inclusion and equal opportunities for all. Development will bring a variety of employment opportunities for apprentices and graduates. It will deliver a significant number of job opportunities for the local community and continue to contribute towards the mix of residential and commercial use that exists along the A582 corridor, which represents a sustainable approach to the growth of urban areas.

6. Conclusion

- 6.1 Maple Grove Developments are concerned with the lack of economic growth ambition identified through the CLLP Publication consultation document which does not align with the wider aspirations across Lancashire. There is a significant shortfall of employment land supply identified in policies EC1-6 and ultimately potential employment site allocations, which would support the economic growth strategy in a sustainable and suitable manner (including Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH), have been excluded due to their current Green Belt status, despite no comprehensive Green Belt review having been undertaken.
- 6.2 Furthermore, the CLLP lacks transparency, as key evidence base documents, including highway and transport information, have been omitted from the consultation material and therefore, it is not possible to fully understand the justification for policy choices and confirm that the most appropriate strategy has been implemented.
- 6.3 Indeed, the SA cannot be considered to fully undertake a comparative and equal assessment of each reasonable alternative if fundamental evidence base documents are not published for review. The SA process must clearly justify policy choices in meeting the development needs of the area, and be clear from the results of the assessment why some policy options have been progressed or rejected.
- 6.4 Ultimately, the Council has placed greater importance on avoiding Green Belt release than meeting recognised employment land needs and directing development to the most sustainable locations.
- 6.5 It is reiterated that Land at Flensburg Way is a suitable, sustainable and deliverable site for employment uses promoted by Maple Grove Developments, who have an excellent track record of delivering employment-led schemes across Central Lancashire and the North West. The Site should be allocated through the CLLP to meet identified employment land requirements.

Appendices:

Appendix 1: Flensburg Way Development Statement



LAND AT ELENBURG WAY

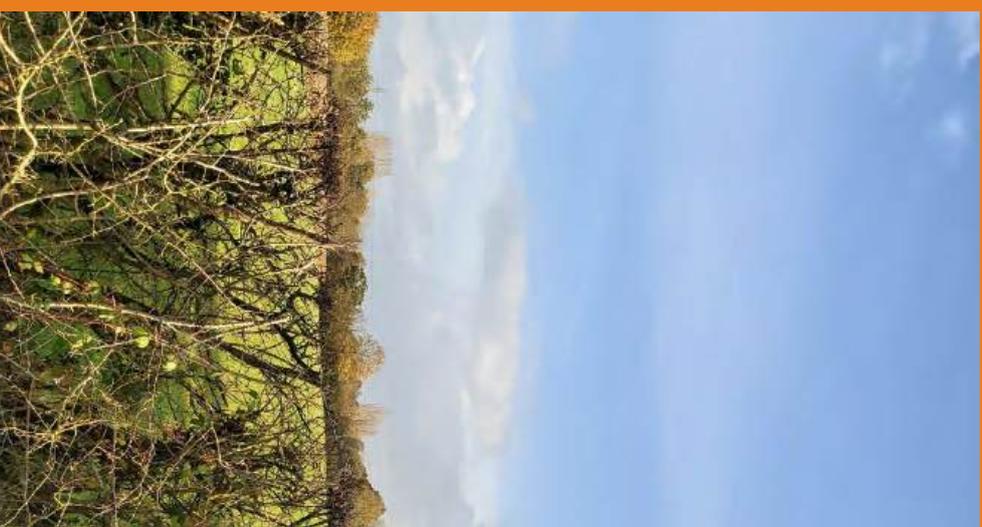
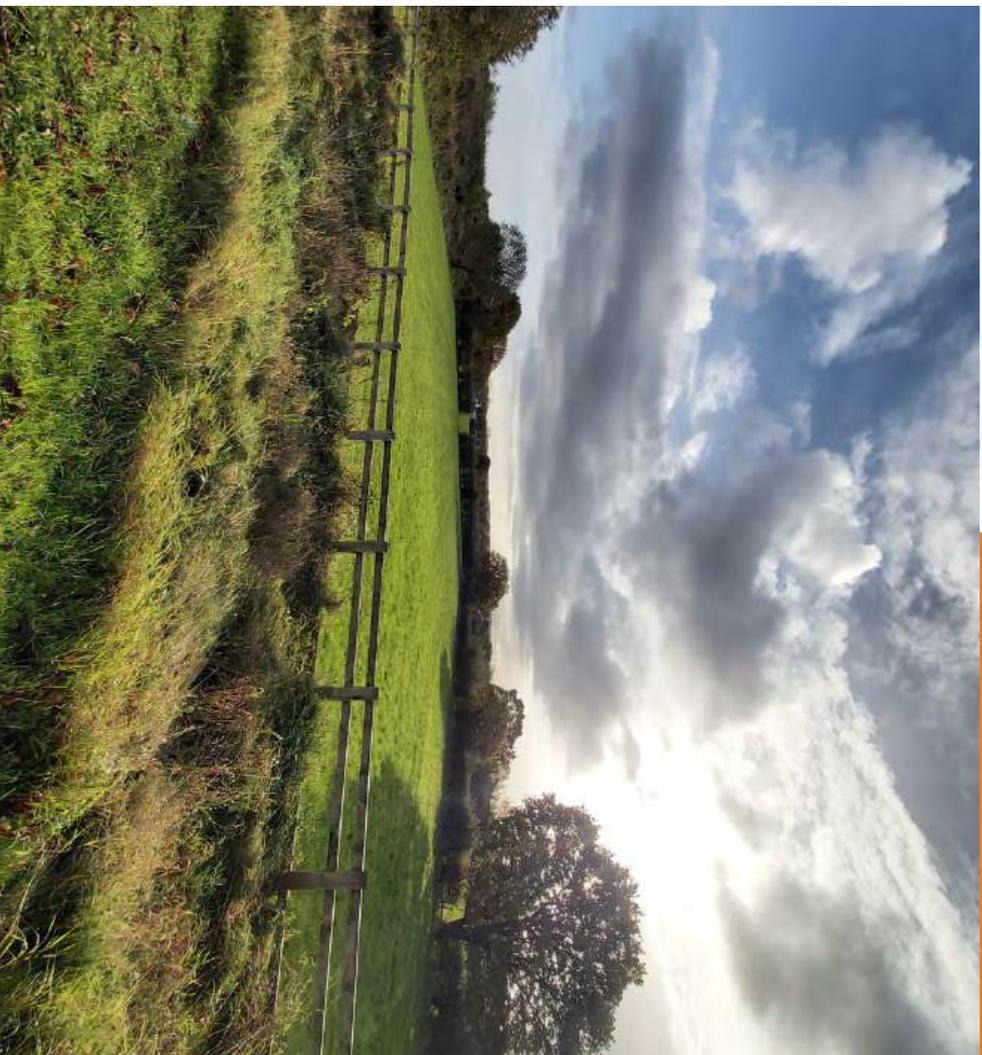
DEVELOPMENT STATEMENT

NOVEMBER 2024



MAPLE GROVE
DEVELOPMENTS
PART OF THE ERIC WRIGHT GROUP





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1 Introduction

This Development Statement has been prepared by Maple Grove Developments to assist with the promotion of land for development at Flensburg Way and Penwortham Way through the Central Lancashire Local Plan process.

Purpose of this Document

This Statement provides the basis of the evidence needed to support the identification of the Land at Flensburg Way and Penwortham Way ("the Site") as an employment led mixed use allocation in the emerging Central Lancashire Local Plan. The deliverability of the Site is fully demonstrated, making reference to the Site's availability, achievability and suitability, as well as confirming that there are no other physical constraints or material considerations that would prevent development coming forward in the manner intended.

Importantly, the basis of the exceptional circumstances case to justify the Site's release from the Green Belt is provided, in order that future employment land needs in South Ribble can be met in full. It is also demonstrated that this Site is an appropriate location to deliver employment uses within this context.

This remainder of the Statement is structured as follows:

- > About Maple Grove Developments
- > Site Location and Description
- > Planning Context
- > Sustainable Location
- > Green Belt and Area of Separation
- > A Deliverable Site
- > Illustrative Masterplan and Design Principles
- > Summary and Conclusions

2 About Maple Grove Developments

Maple Grove is a locally based company, being the commercial development arm of the Eric Wright Group.

Maple Grove Developments (MGD) is the commercial development arm of the Eric Wright Group (EWG), a leading North West development and construction business. Maple Grove is pleased to be promoting a site that it controls for employment uses through the Central Lancashire Local Plan process.

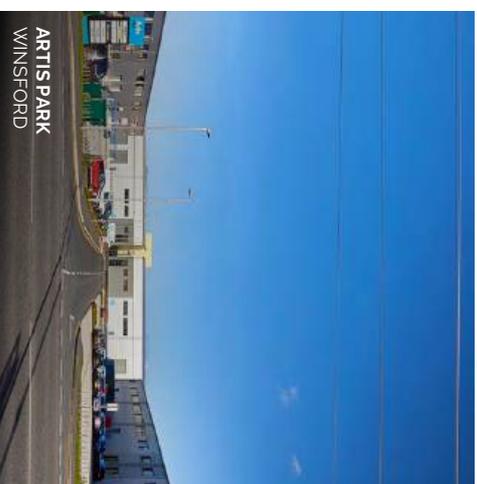
Partnership and collaboration are at the core of MGD's ethos, with this culture running from the first introduction through to the final delivery of the scheme. EWG employs over 950 people with over 60% living in the Lancashire area. The Group has a turnover of circa £200m and is a Real Living Wage employer.

Stability and relationship longevity are paramount to our philosophy. EWG, including MGD, is wholly owned by the Eric Wright Charitable Trust, which was established on the principles of sustained employment and community regeneration. This is achieved through the reinvestment of time, money and

resources, supporting the longer term commercial and charitable strategies. All profits generated by EWG are either reinvested in the Group's business or distributed to the Trust for its significant charitable activities throughout the Northwest region.

Maple Grove was formed in 1981 and is a focused small team of property development specialists who have support internally from EWG's construction, legal and property management experts along with external advisors. This flexible and highly customisable approach to property development makes MGD a compelling option for our clients.

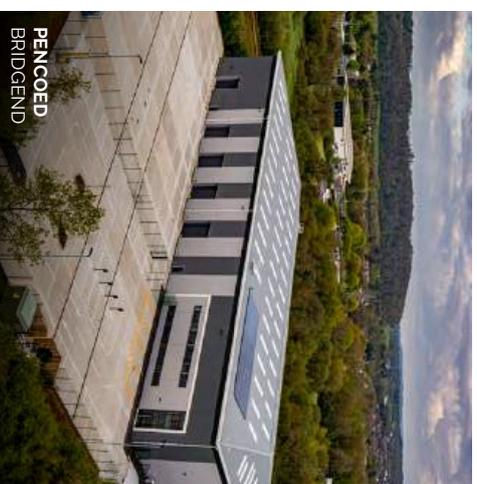
MGD has a proven track record of delivering industrial schemes and the wider group has a long history of working in Lancashire. Over half of MGD's work is in delivering industrial and employment developments, ranging from the smaller multi-let schemes such as Artis Park in Winsford which totals 125,000 sq ft to the larger 1.7m sq ft Lancashire Central mixed-use scheme, where MGD has recently secured planning consent for a mix of industrial, manufacturing, and logistics floor space.



**ARTIS PARK
WINSFORD**



**LANCASHIRE CENTRAL
PRESTON**



**PENCOED
BRIDGEND**



**SIEMENS
ULVERSTON**

3 Site Location and Description

The Site

The Site extends to 11.84 hectares and is in single ownership, located near Farington Moss in South Ribble.

It is broadly triangular in shape, bound by Flensburg Way (A582) across the south and Penwortham Way to the west. Farington Household Waste Recycling Centre is situated beyond the southern boundary of the Site boundary and fronts onto the roundabout that connects Flensburg Way with Penwortham Way. The eastern boundary of the Site is defined by Lodge Lane which is a narrow road serving a small number of residential dwellings that line the opposite side of the lane as well as Withnell Angling Club and Oakland Fishery and Caravan Park. The north of the Site is contained by a dense cluster of trees and a large pond which acts as a buffer from the railway line to the north.

The Site itself is formed of flat agricultural land, with field boundaries defined by hedgerows, scattered trees and ditches within the Site. The boundaries of the Site are largely contained by mature trees which have the effect of limiting any views to or from the south and west of the site. The Site is therefore contained by strong defensible boundaries on all sides.

Flensburg Way will provide the primary means of access onto the Site. However, there is also the potential for a secondary access for the site to be provided onto to the south and west of the site towards Goldcrest Avenue and Tank Roundabout (Flensburg Way / Penwortham Way / Goldcrest Avenue) through the wider A582 improvements that are being proposed by LCC. This will be reviewed in more detail at the appropriate stage and would be subject to design feasibility testing.



FIGURE 1 SITE LOCATION PLAN

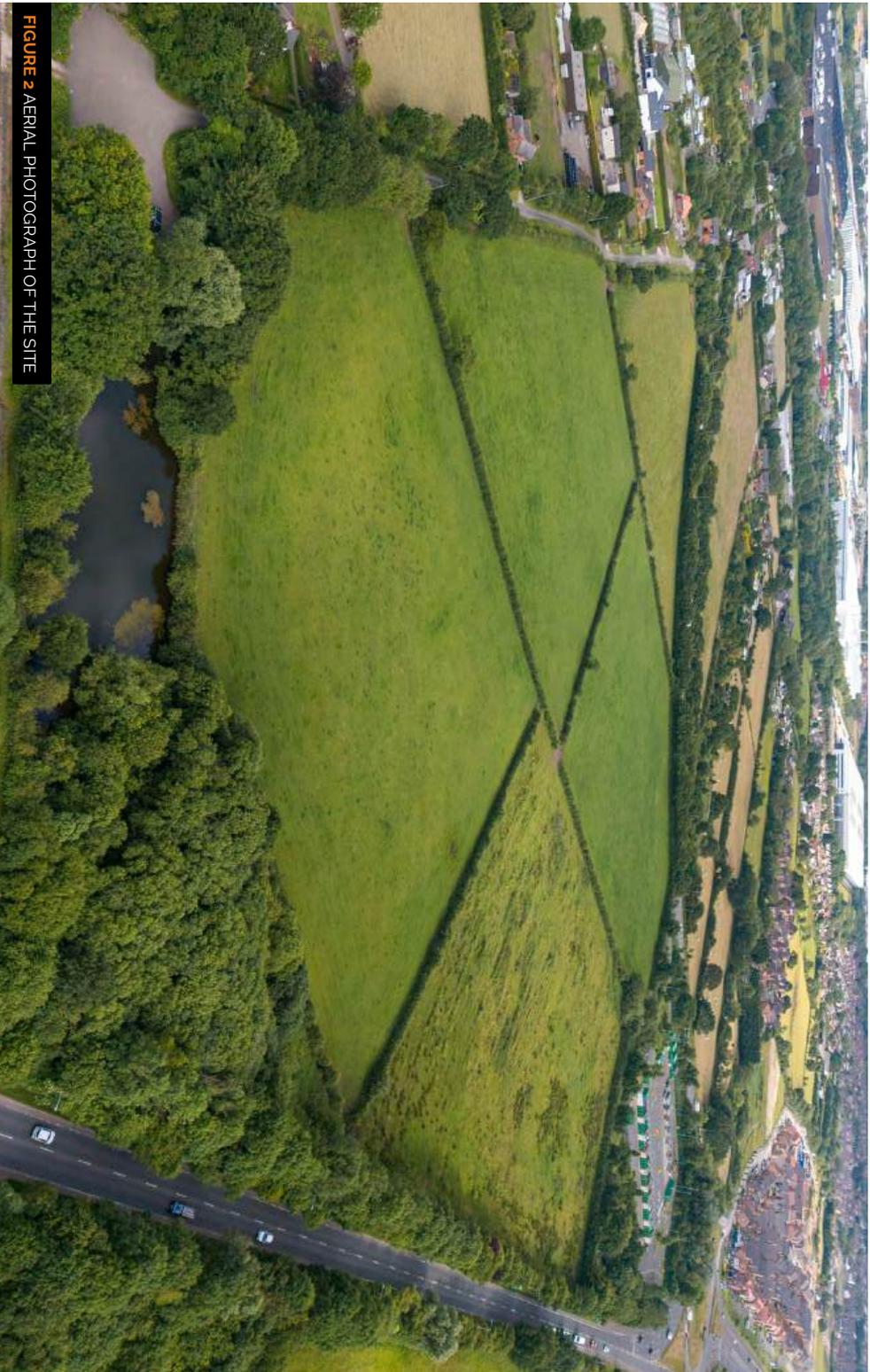


FIGURE 2 AERIAL PHOTOGRAPH OF THE SITE



FIGURE 3 FLENSBURG WAY



FIGURE 4 PHOTO OF THE SITE

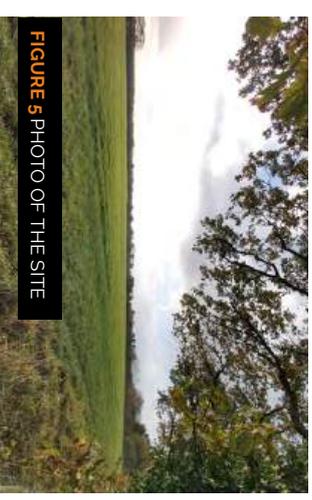


FIGURE 5 PHOTO OF THE SITE

Surrounding Area

The Site is highly accessible as it lies on the local strategic road network and it is just a 5 minute drive east to Junction 29 of the M6 and Junction 1 of the M65.

The town of Leyland is located just over 3km to the south of the site and other South Ribble settlements are in close proximity such as Lostock Hall, Penwortham, Bamber Bridge, Farington and New Longton. Beyond this immediate area is the city of Preston (8km north) and the town of Chorley (13km south).

In respect of connectivity, Lostock Hall train station is located just 2km to the north east of the Site and provides regular daily and direct services to a wide range of destinations including Preston (10 minutes), Blackburn (20 minutes) and Burnley (49 minutes). The short connection to Preston then provides access to other locations, including Wigan, Bolton, Blackpool and Lancaster.

The Site is therefore highly accessible from a wide range of destinations. It is also understood that new proposals have been developed to improve journeys on the A582 between Preston and the M65 and provide better provision for buses, walking and cycling between Preston and Lostock Hall.

There is a mix of uses in evidence in the surrounding area. There are existing industrial and commercial uses to the south at Leyland Business Park, as well as to the east at Lostock Hall off Sherdley Road and beyond that around the A6 roundabout at Bamber Bridge. As outlined above, there are large residential areas surrounding and interspersed amongst these commercial areas, which help contribute towards the prevailing mixed use character of the surrounding area.

This is also an area that is to undergo significant change. The A582 Penwortham Way that runs along the western boundary is proposed to be dualled in the future with further junction improvements planned at the Croston Road Junction in the vicinity of the site to the east. The Pickering's Farm residential development at Penwortham is anticipated to deliver c.2,000 homes over the next 15-20 years and planning permission has also recently been granted at Croston Road, Farington Moss to the south for 520 homes which will be facilitated by the major road network improvements.

This is an extremely well connected Site that benefits from being located adjacent to major transport infrastructure and has access to a large residential population that would benefit greatly from the job opportunities that would become available. This is only set to increase with the new residential development proposed in the vicinity of the Site.

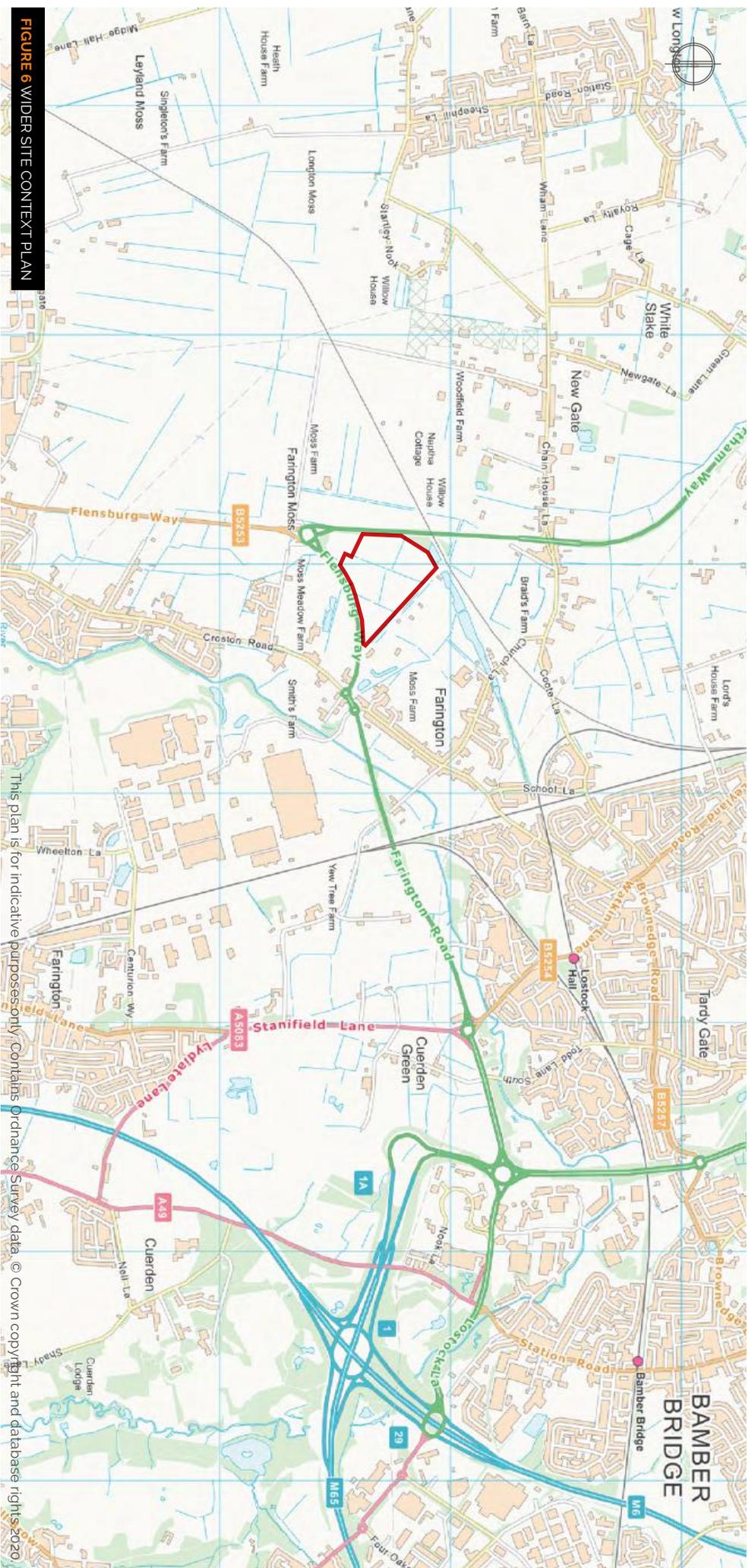


FIGURE 6 WIDER SITE CONTEXT PLAN

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4 Planning Context

Development Plan

The development plan currently comprises the Central Lancashire Core Strategy DPD (2012), the South Ribble Local Plan (2015) and the Joint Lancashire Minerals and Waste Local Plan. The Site is located within the Green Belt (Policy G1) and is also identified as an Area of Separation (Policy G5).

The emerging Central Lancashire Local Plan (CLLP) will replace the policies within the South Ribble Local Plan (2015) and this presents the opportunity to release the Site from the Green Belt and allocate the land for employment development.

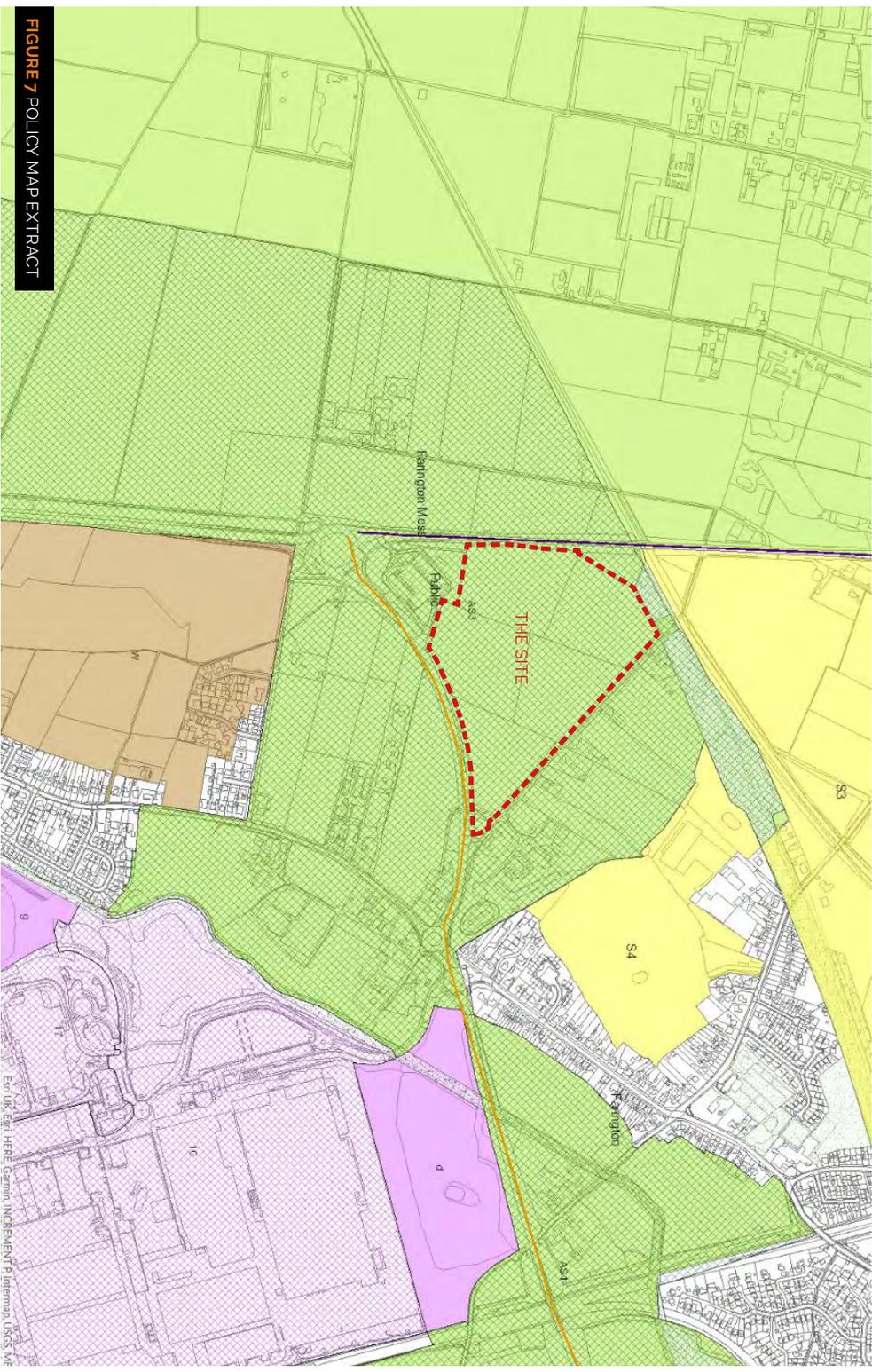


FIGURE 7 POLICY MAP EXTRACT

Planning History

There is no planning history on the Site that is of relevance to its future development. However, there are a number of recent planning applications concerning land nearby which do provide useful context and help to contextualise the strategic growth that is taking place within this general location.

Household Waste Disposal Depot

The Household Waste Disposal Depot adjacent to the immediate south of the Site was subject to a planning application in 2012 (**Ref: 07/2012/0029/CM**) and was submitted by Lancashire County Council for the redevelopment and extension of the existing recycling centre. A number of ecological and technical reports were submitted with the planning application. The **Landscapes Character and Visual Effects** report provides a detailed assessment of the existing landscape character which the Site forms part of and this assessment will be referred to later in this Statement.

Major Road Network Improvements

Lancashire County Council submitted a planning application (**Ref: LCC/2020/0014**) for the dualling of the A582 and B5253, which runs alongside the Site. This significant highway project is to achieve four key objectives:

1. Improve journey times and reduce congestion on land on roads linking to) the A582, B5253 and also Penwortham New Bridge connecting to Ringway and Preston city centre.
2. Provide easier access to Cuerden from the west.
3. Provide significantly better access to new housing developments at Pickering's Farm located between Penwortham and Lostock Hall, and development sites to the North West of Leyland at Croston Road and Moss Side.
4. Allow opportunities for bus priority measures, public realm enhancements, and improvements to prioritise and promote walking and cycling along the B5253 Leyland Road and at Tardy Gate.

These significant strategic highway improvements will therefore help to reduce congestion in the vicinity of the Site and help to support economic growth by improving accessibility and available road capacity along the Strategic Road Network. The A582 and the B5253 also provide local connectivity to the wider motorway network – the M65 and the M6.

The Council have also prepared additional plans to reduce congestion along the A582 as the dualling scheme is developed further. This focused scheme includes an improvement scheme at the Croston Road Junction in the vicinity of the site to the east, and the proposed highway layout could accommodate potential dualling in the future alongside bus network improvements, active travel facilities alongside advanced technology to manage congestion and support sustainable travel choices.

Farington Moss Major Development Site Allocation

This is a residential-led allocation within the adopted South Ribble Local Plan and reserved matters approval was secured in October 2020 by Keepmoat Homes for 399 homes alongside a detailed scheme for 121 homes, a total of 520. Further south, Miller Homes has secured planning permission for 175 homes and Kier Homes for another 174. These developments are now under construction.

A new employment led mixed use development at the Site would therefore provide job opportunities for the new influx of residents to the Farington Moss area and complement the changing character of the area, whilst still helping to maintain the appropriate balance between residential and commercial areas that exists at the moment.

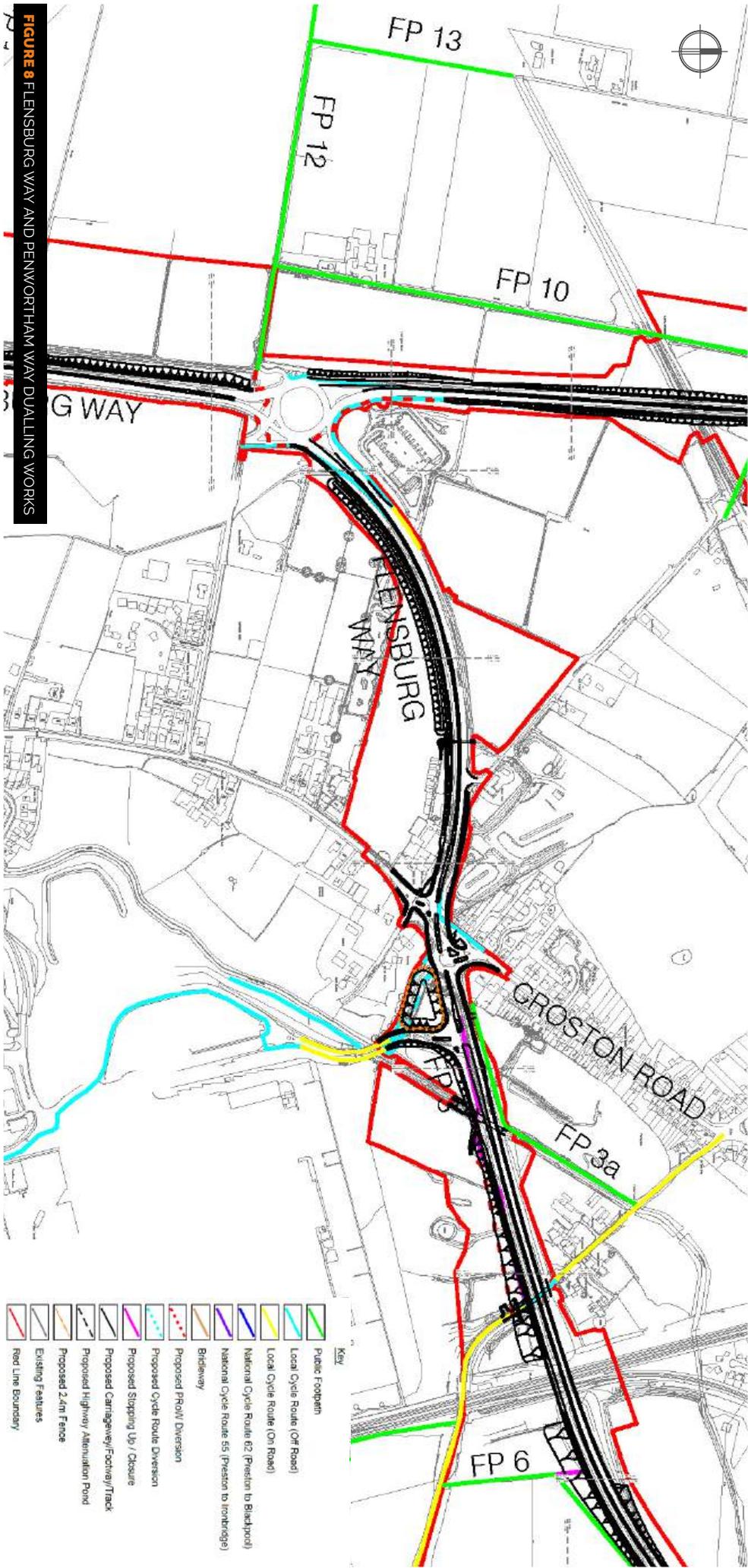


FIGURE 8 FLENSBURG WAY AND PENWORTHAM WAY DUALING WORKS

Emerging Central Lancashire Local Plan

MGD provided a response to the Central Lancashire Preferred Options Consultation that took place in early 2023 and will be actively engaging in the remainder of the plan preparation process.

MGD are entirely supportive of the Central Lancashire Local Plan (CLLP) Objective to deliver commercial development at accessible and sustainable locations, which runs alongside the continuing commitment to infrastructure improvements and promote sustainable travel.

Opportunities for new jobs therefore need to be sustainably located with excellent connectivity and located close to new and existing residential areas; thus reducing the reliance on the private car and the need for long distance commuting between homes and workplaces.

The Site was identified as a Preferred Employment Allocation (Ref: SR/EP1.3) in the Preferred Options consultation document and so it has been recognised that development of the Site would support the aforementioned Objectives by offering a well-located destination for jobs and economic growth situated in close proximity to large established land (emerging) residential areas.

Employment land requirements in South Ribble

The 2022 Employment Land Study confirms that the stock of employment land is falling and that there is a lack of readily available land in Central Lancashire. It also concludes that the Farington area is recognised to be a suitable location for new employment allocations.

In terms of the shortfall of employment land in South Ribble, the 2017 study suggested that 31.5ha of additional employment land would need to be allocated to meet demand. The 2019 and 2022 updates to this study consider that the most appropriate forecast for the amount of new employment land required is the 'Local Take Up' Scenario.

This suggests that South Ribble now has a further need of 25.68ha of additional employment land required against the backdated supply for the period 2021 to 2038.

It should be noted that the chosen 'Local Take Up' scenario, which produces the employment need figure of 25.68ha is one of a number of employment land modelling forecasts considered in the 2022 Update. The Local Take Up scenario generated the lowest amount of additional employment land supply needed.

Other Policy Off and Policy On scenarios suggested that the requirement for additional employment land supply in South Ribble, over the plan period to 2038 could be up to 77.66 ha.

This weight of evidence clearly demonstrates there is a significant quantum of new employment land required to be identified through the CLLP review process, particularly within South Ribble.

On the supply side of the equation, insufficient land is available within the existing urban area or on other land not currently within the Green Belt to satisfy this requirement and so exceptional circumstances exist to undertake a review of the Green Belt through the CLLP process.

Appropriate sites can then be identified and released from the Green Belt in order that South Ribble's (and in turn Central Lancashire's) future employment land needs can be met in full.

The remainder of this Statement now demonstrates that the land at Flensburg Way and Penwortham Way is an entirely appropriate Site to be considered for release from the Green Belt.



FIGURE 9 CROSTON ROAD JUNCTION IMPROVEMENT

5 Sustainable Location

The Site is in a highly sustainable location and is to further benefit from improvements to the immediately strategic road network. A wide variety of services and connections are available within a short distance of the Site and this location is evidently well-placed to cater for future employment development needs.

The Infrastructure Map identifies the location of the key Infrastructure connections and transport nodes nearby the Site.

Junction 29 of the M6 and Junction 1 of the M65 is a 3km (7 minutes) drive to the east of the Site via Farington Road. This connection is crucial as it provides regional access for logistics and transportation businesses which is a key emerging sector. From Junction 29 of the M6, it is a 34km (21 minutes) drive south to Junction 21A which connects to the M62 (Junction 10). From there it is a 21km (19 minutes) drive east to Manchester city centre. Alternatively, Manchester city centre can be accessed directly by the M61 which is 45km (32 minute drive) south east.

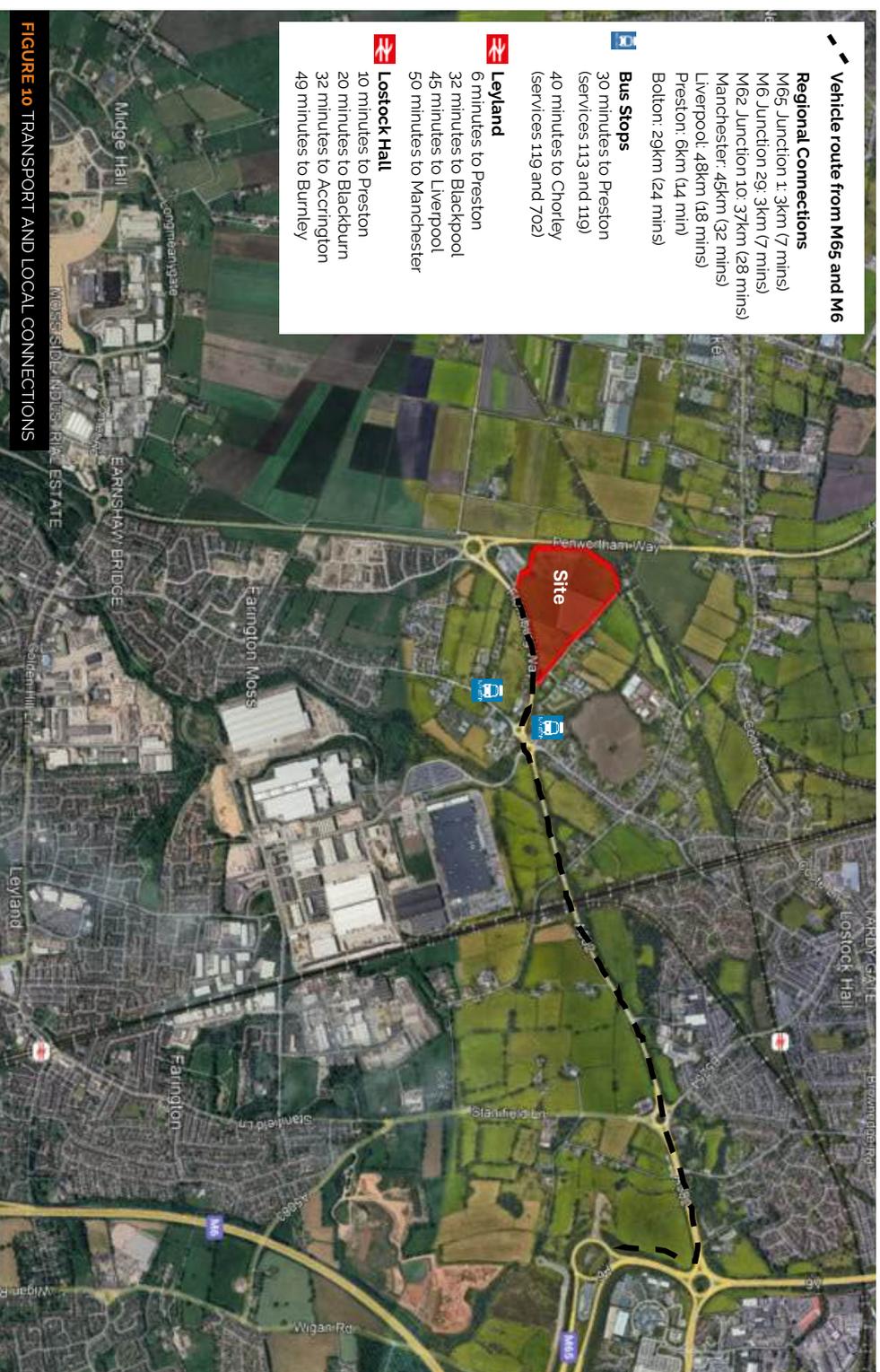


FIGURE 10 TRANSPORT AND LOCAL CONNECTIONS

From Junction 29 of the M6 (Junction 10), Liverpool city centre is a 48km (38 minutes) journey via the M58. Bolton town centre is an 29km (24 minutes) journey via the M61 and Preston city centre is just 6km (14 minute drive) north. The M65 provides access east towards Blackburn and Burnley.

The journey from the Site to this key transport node is highly suitable route via the A582 (Flensburg Way) and this view is further reinforced by Lancashire County Council's ongoing commitment to the improvement of this strategic road to support this location as an area for strategic growth in the future.

The nearest bus stop to the Site is situated on Croston Road, to the south of the A582. It is a 270m walk from the south of Lodge Lane where there is a footpath providing safe pedestrian access from the Site to the bus stop known as Fiddler Lane. From here, services 119 and 702 run south-bound every hour to Chorley town centre with a journey time of circa 40 minutes. Bus services north-bound are available from a bus stop known as Lower Field on Croston Road, to the north of the A582.

This bus stop is a 350m walking distance and also has a footpath providing safe access from the Site. Services 113 and 119 operate from this bus stop and are available twice each hour, terminating in Preston city centre with a journey time of approximately 30 minutes.

Leyland Train Station is situated 3.4km south east of the Site and is a 40 minute walk or is a 30 minute bus journey with service 113 from Lower Field Bus stop before catching service 111 at Lostock Hall onto Leyland. Leyland Train Station is a key north to south connection point between the major urban areas of Preston, Liverpool and Manchester city centres. Northern train services operate frequently from this station with connections to Preston three times each hour (6 minute journey time), Blackpool North twice each hour (32 minute journey time), Liverpool Lime Street every 60 minutes (45 minute journey time), Manchester Victoria and Manchester Piccadilly twice each hour (50 minute journey time).

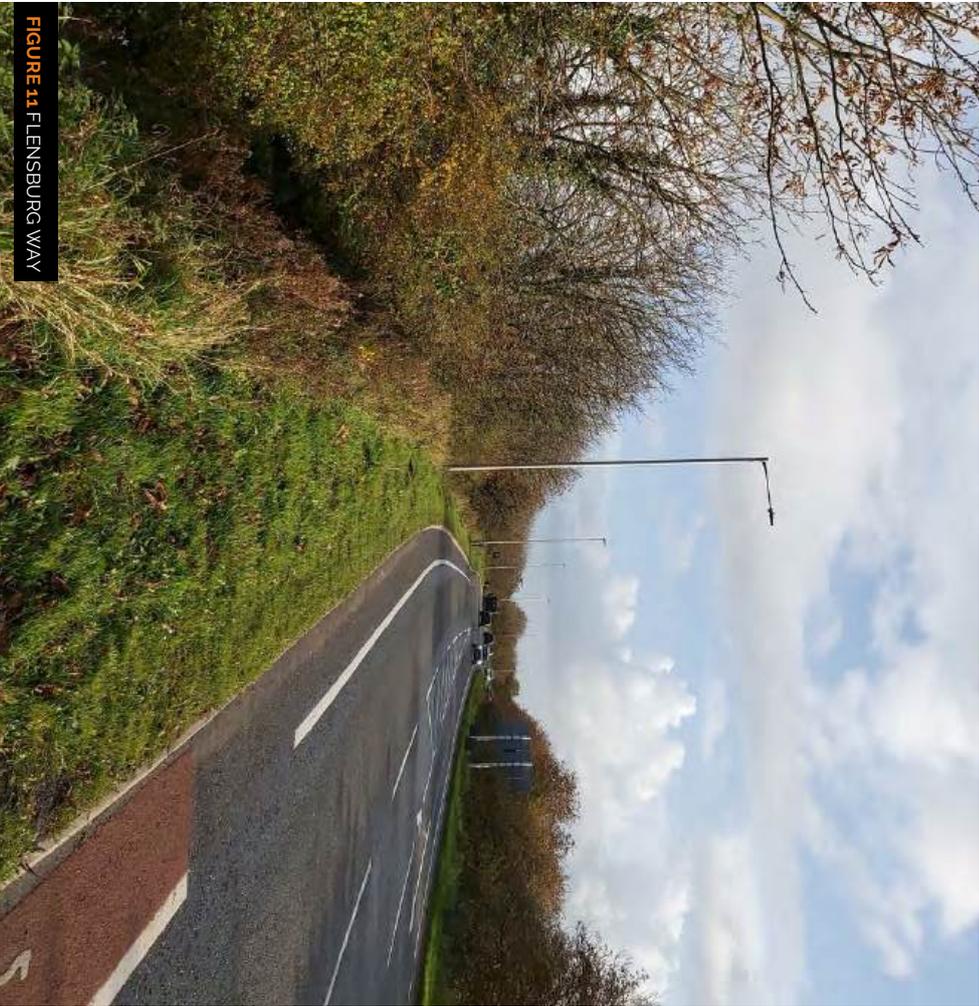


FIGURE 14 FLENSBURG WAY



FIGURE 12 VIEW TOWARDS SE CORNER OF SITE

Lostock Hall Train Station is 2.3km north east of the Site and is accessible by bus service 119 from Fiddler Lane or a 20 minute walking time. This station connects the north bound mainline with other areas to the east running from Colne to Preston. The service east-bound runs hourly and has a journey time of 64 minutes to Colne calling at 15 other stations including Blackburn (20 minutes), Accrington (32 minutes) and Burnley Central (49 minutes). Services to Preston run hourly with a journey time of 10 minutes.

It is understood that new proposals have been developed to improve journeys on the A582 between Preston and the M65 and provide better provision for buses, walking and cycling between Preston and Lostock Hall.

The active travel proposals for the proposed development site will take account of the above scheme by Lancashire County Council (LCC) Highways, to ensure the provision of an integrated active travel strategy to serve the site.

In addition, LCC have advised about their Focused Scheme for this area of the A582, which includes an improvement scheme at the Croston Road junction in the vicinity of the site to the east, and the proposed highway layout could accommodate potential dualling in the future. This includes improved footway and cycleway facilities on all approaches through the junction, whilst there is a proposed footway on the A582 to the east of the site there is a proposal for a shared footway / cycleway on the north side of the carriageway that provides a good connectivity opportunity for the development site.

The site layout will take account of the above scheme proposals and consist of crossing points at side road junctions to facilitate safe access for active travel users throughout the site on the main desire lines, including the provision of footways and off-carriageway cycle lanes along the internal road network.

In terms of opportunities to improve connectivity to the wider area, it is considered that there is potential to improve the connectivity to the east of the site for active travel users through the introduction of a shared use path from the southeast of the site along the eastern boundary to the Lodge Lane / Flensburg Way junction opposite the footway on the east side of Lodge Lane, including the provision of a safe crossing point in this general location. There is also the potential opportunity to provide a footway on the site frontage along Flensburg Way from the proposed site access junction, to link into the existing footway on the east side of Lodge Lane.

A large residential population is also within close proximity of the site and the introduction of c.3000 new homes to the area at the Farington Moss Major Development Site and Pickering's Farm means that both the existing and new residents will be afforded access to new job opportunities within close proximity to their homes. From a plan-making perspective, this aligns with the NPPF objective to promote sustainable development.

6 Green Belt and Area of Separation

Exceptional Circumstances exist to release Land from the Green Belt in South Ribble in order that the identified employment needs set out in the 2019 update to the Employment Land Study can be met in full. It has also been established that the Site is a sustainable location for an employment-led mixed use development and so consideration must now be given as to whether the release of this land from the Green Belt can be justified in this location.

Policy Context:

With reference to the development plan (Central Lancashire Core Strategy 2012 and South Ribble Local Plan 2015), the site is located within the Green Belt and falls within one of the three 'Areas of Separation' identified in South Ribble under Policy G5 (AS3 - Between Farington, Lostock Hall and Penwortham).

The Green Belt policies in the Local Plan are consistent with the NPPF, which at paragraph 143 establishes the five purposes that Green Belt serves:

- a. to check the unrestricted sprawl of large built-up areas;
- b. to prevent neighbouring towns merging into one another;
- c. to assist in safeguarding the countryside from encroachment;
- d. to preserve the setting and special character of historic towns; and
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Policy G5 'Areas of Separation' further bolsters the objective to protect built-up areas from merging into each other and protect the land from inappropriate development.

Paragraph 145 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. I

n the absence of any other reasonable options for meeting identified for employment development, as required by NPPF paragraph 146, it is quite clear that exceptional circumstances exist and a review of the Green Belt is necessary.

When reviewing Green Belt boundaries, paragraph 147 states that the need to promote sustainable patterns of development should be taken into account.

Again, it has been established in the remainder of this Statement that the Site is in a highly sustainable location and the significant quantum of residential development proposed in the locality further reinforces the need for employment and commercial uses in this location to complement the emerging pattern of development.

Green Belt Assessment

It is acknowledged that in isolation, removal of the Land at Flensburg Way would result in an illogical Green Belt boundary. Taking in to account the presence of existing built development along Lodge Lane and the clear defensible boundaries provided by Flensburg Way and Penwortham Way, Figure 13 indicates the parcel of land that is considered appropriate for release from the Green Belt in order to accommodate the proposed development and ensure that employment needs are met in South Ribble. This also includes a small amount of land to the east of Lodge Lane, beyond that being promoted by MGD, and the release of this land would have the effect of 'rounding off' the settlement, working within the confines of the defensible boundaries.

The contribution this Parcel makes to each of the five Green Belt purposes is now considered in more detail. This assessment has been based upon an on the ground assessment of the Site and the context of the surrounding area which is illustrated within the following images of the Site.

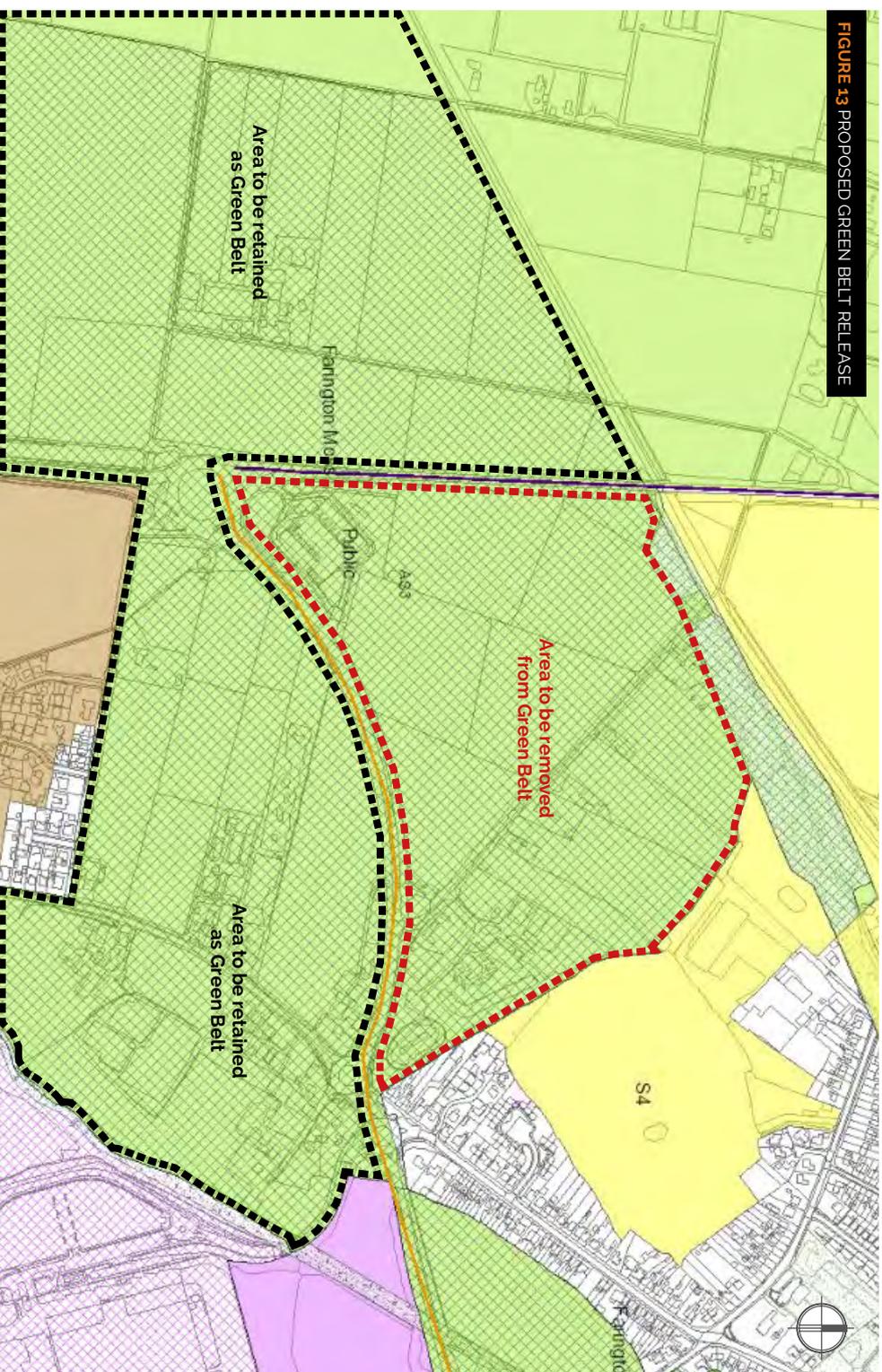
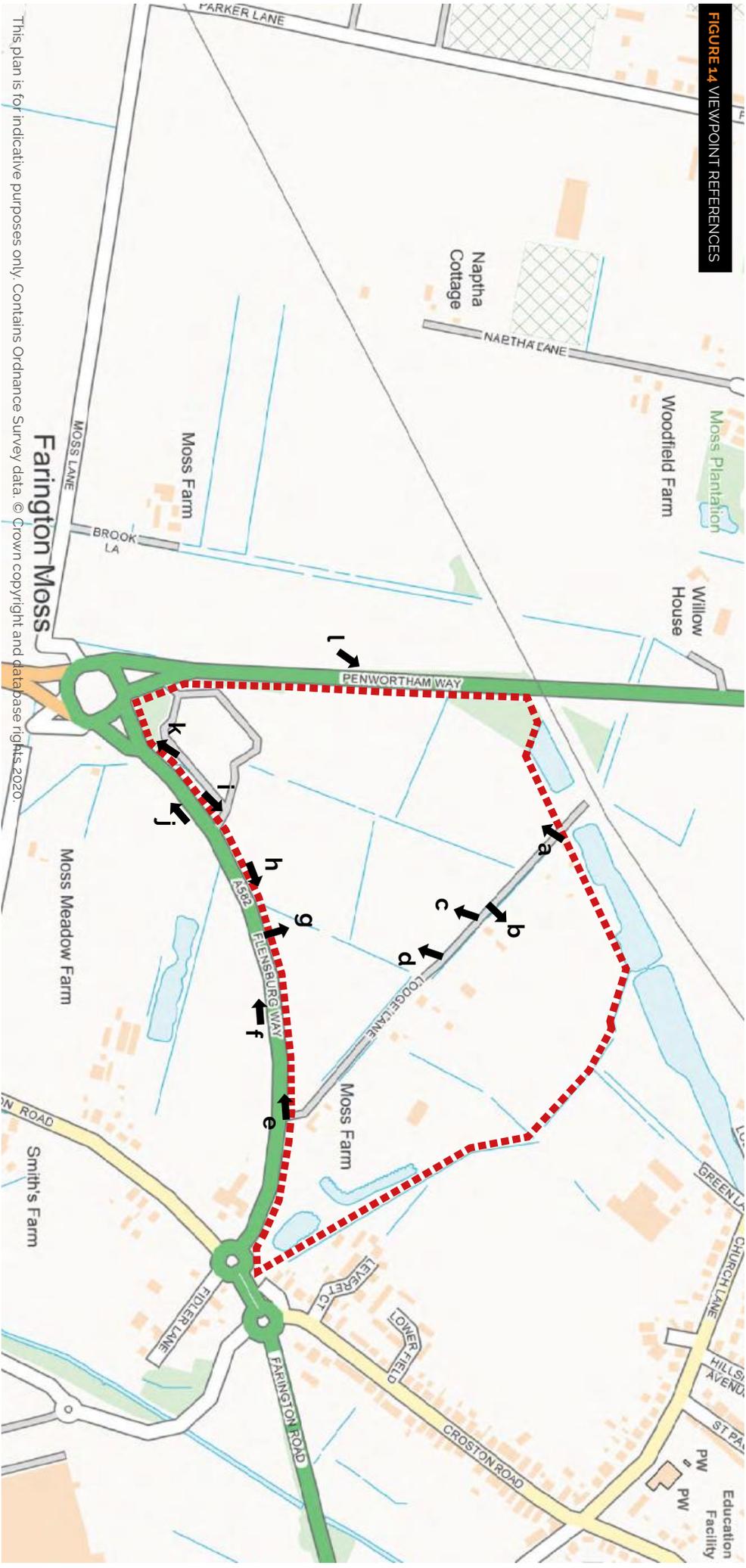
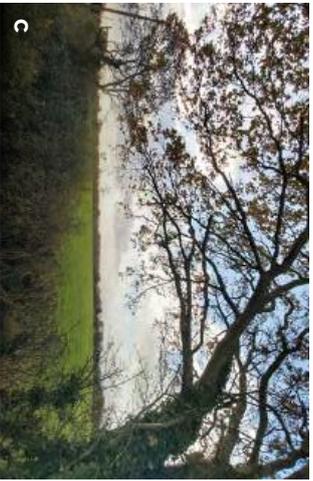




FIGURE 14 VIEWPOINT REFERENCES



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Purpose 1:
To check the unrestricted sprawl of large built-up areas

The eastern edge of the Parcel abuts Farington Moss, which then merges into Lostock Hall. This Parcel also contains residential properties and commercial uses that are contiguous with Farington Moss. The Parcel itself does not therefore have the effect of acting as a barrier at the edge of a clearly defined edge of a large built-up area and no clearly defined durable boundary exists. The Parcel therefore makes no contribution towards this purpose.

Conclusion: No contribution

Purpose 2:
To prevent neighbourhood towns merging into one another

The Parcel contributes towards maintaining a gap between the large built up areas of Lostock Hall to the north and Leyland to the south. However, the linear nature of Farington Moss and the presence of other built features along the A582 corridor have the effect of reducing the sense of openness and the Green Belt in this location does not provide a clear distinction between the two settlements, i.e. a clear, unobstructed gap free from built development does not exist.

Whilst development of this Parcel will see a reduction of a gap between the two towns, land to the south of Flensburg Way and north of Moss Lane which is to remain in the Green Belt will still preserve a gap between Lostock Hall and Leyland. As a result, the contribution this Parcel makes against this purpose is reduced and so it is considered to make an overall moderate contribution towards this purpose.

Conclusion: Moderate contribution

Purpose 3:
To assist in safeguarding the countryside from encroachment

There is significant evidence of urban encroachment within the Parcel. The presence of the Farington Household Waste Recycling Centre in the south west and the residential / commercial properties along Lodge Lane in the east have the effect of urbanising the Parcel. The parcel is extremely well contained by clear defensible and durable boundaries in the form of Penwortham Way to the west, Flensburg Way to the south and the railway to the north.

The durability of the road boundaries are further reinforced by the potential dualling works that are to take place. It is clear therefore that this Parcel makes no contribution towards this purpose as it does not safeguard the countryside from encroachment.

Conclusion: No contribution

Purpose 4:
To preserve the setting and special character of historic towns

Neither Lostock Hall or Leyland are considered to be Historic Towns in the context of the criteria usually employed when undertaking a Green Belt Review. There are no listed buildings or conservation areas within close proximity of the site.

The Parcel therefore makes no contribution towards this purpose.

Conclusion: No contribution

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and consequently increasing the demand for development land in urban areas. As such, different parcels of Green Belt land around settlements will have the same contribution towards this purpose.

The reasons for not including the assessment against this Purpose is that it would potentially have the effect of skewing the Overall Assessment (this would apply to all Parcels being considered as part of a boroughwide Green Belt Review) and so consistent with the approach taken by other local authorities and in the interests of best practice.

Conclusion: MGD has not assessed the parcel against this Purpose.

Green Belt Assessment Summary

The following table provides a summary of the conclusions reached by MGD when assessing the contribution of the wider parcel at Flensburg Way / Penwortham Way makes to the purposes of including land within the Green Belt as set out at paragraph 143 of the NPPF. Overall, the Parcel is considered to make **between a Low Contribution** and **No Contribution** and so can be considered a suitable for release from the Green Belt.

Overall contribution of the Parcel towards each Green Belt purpose				
Purpose 1	Purpose 2	Purpose 3	Purpose 4	Overall
No contribution	Moderate contribution	No contribution	No contribution	No contribution/ Low contribution

The diagram adjacent confirms that the key separation function of the Green Belt will remain once the Site is released from the Green Belt and that importantly, it is consistent with the characteristics of the existing situation.

It is clear that the parcel of land to the immediate south of the Site on the opposite side of Flensburg Way still fulfils the purpose of the Green Belt in this location to prevent towns from merging into each other and the function of the Area of Separation set out under Policy G5 also remains intact, should the emerging CLLP seek to retain this policy objective.

The release of the land at Flensburg Way and Penwortham Way can therefore be justified, as exceptional circumstances exist to release land from the Green Belt through the CLLP review process in order to meet future employment needs and the land makes between a Low and No Contribution towards the five purposes of including land within the Green Belt.

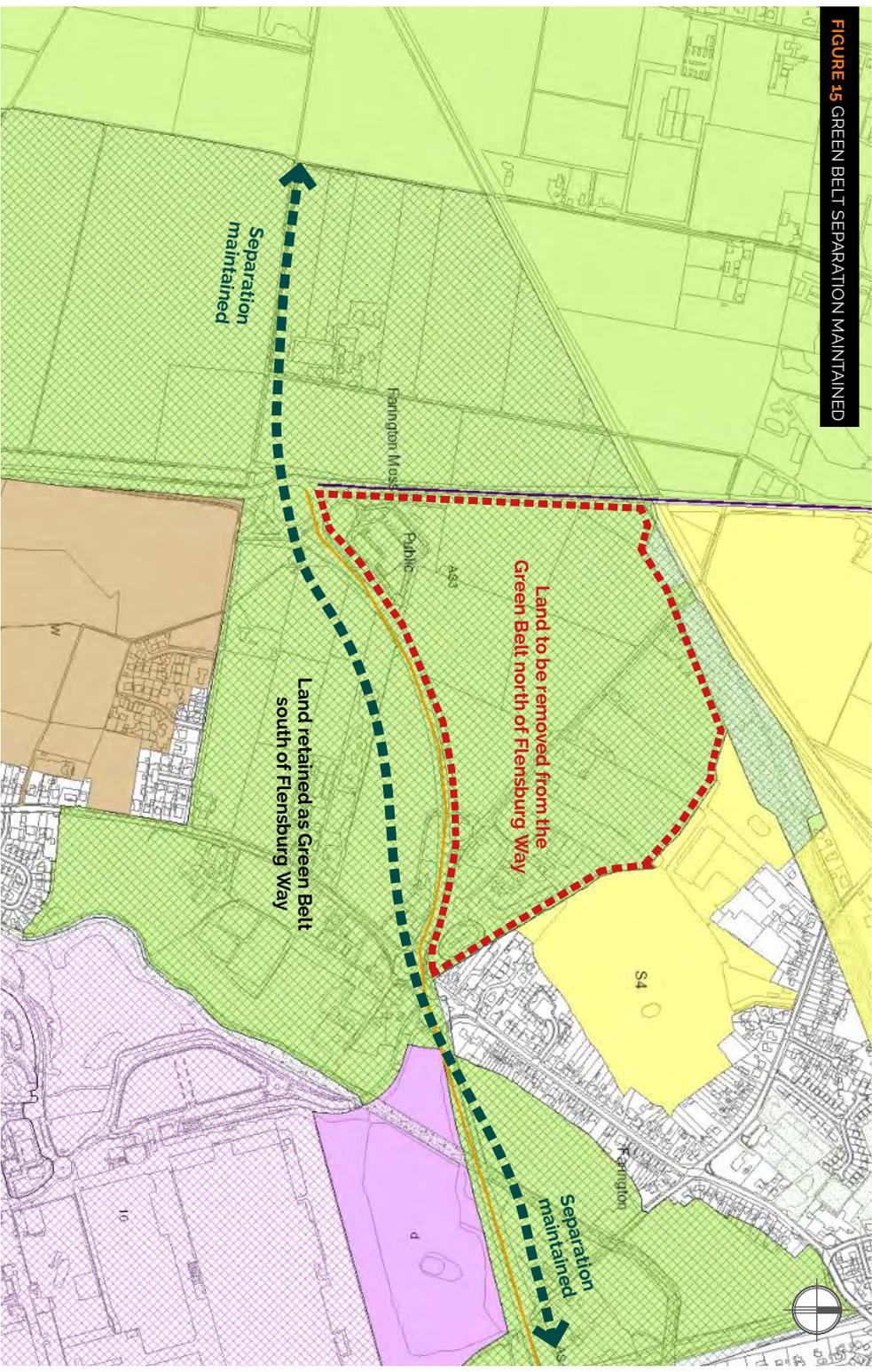


FIGURE 15 GREEN BELT SEPARATION MAINTAINED

7 Market Demand

The Central Lancashire Employment Land Study 2022, which covers South Ribble as well as Chorley and Preston, notes that South Ribble has a growing population and, relatively speaking, low unemployment rates (2.9% in 2020).¹ The content of the report is relevant in consideration of the need to identify a sufficient quantum and type of land, in the right locations, to facilitate economic development in South Ribble.

Paragraph 11.11 of the 2017 study stated that "Manufacturing and logistics are particular strengths of South Ribble" and the 2022 update confirms that Central Lancashire's industrial market has proved resilient over the COVID-19 pandemic, with industrial and warehousing demand remaining consistently strong. The study notes that demand is for space in a range of sizes up to 5,000sqm, however smaller units of 0-500sqm are most needed.

Land at Flensburg Way and Penwortham Way is of a size which could address the shortage of premises in South Ribble by providing a wide variety of unit sizes to meet market demand. The location of the Site, although not directly adjacent to a motorway junction, is only 1.5 miles from Junction 29 of the M6, with connectivity along major A roads, which are to be upgraded by having their capacity increased. As such the location is extremely well connected and would be attractive to the market as demonstrated by the success of the nearby Leyland Business Park.

Maple Grove and its commercial advisers are of the view the Site would be well placed to meet part of the projected shortfall in employment space, given its location to both motorways and labour force as well as the prominence it offers to the existing highway network.



8 A Deliverable Site

The National Planning Policy Framework requires Local Plans to be prepared positively, in way that is aspirational but deliverable. The deliverability of allocated employment sites will be an important test of soundness at the Local Plan Examination and in respect of viability, it is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks.

MGD confirm that the Site is both deliverable and viable and so can be use allocation in the CLLP.

Available

The land is being promoted by MGD who have an enviable track record of delivering commercial developments across Lancashire and there are no legal restrictions, covenants, clawbacks or ransoms which would impede the future development of the Site in the manner intended. As such, there are no third-party interdependencies related to the Site which could delay its delivery.

MGD is fully committed to bringing the Site forward for employment-led mixed use development at the earliest practical opportunity. Once the Site secures a draft Allocation and the emerging Local Plan has reached an advanced stage of the process, MGD would generally commence the outline planning application work at risk in order to be in a position to submit an application at the point of adoption. Based on previous experience of promoting sites of a similar size and typology, it takes approximately 18 months between submitting an outline planning application and beginning construction on the Site.

The Programme for Review of the Central Lancashire Local Plan, set out within the Local Development Scheme (April 2024), indicates that the Council expects to submit the Local Plan to the Planning Inspectorate for examination by June 2025 with adoption by 31st December 2026. Work will commence on this 11.84 ha Site within years 0-5 of the Local Plan period and so should be identified as an employment-led mixed use allocation to be brought forward immediately.

Suitable

The locational attributes of the Site make this land highly suitable for development now. Development would not cause harm to environmental interests and opportunities for biodiversity enhancements also exist. It has been robustly demonstrated in Section 5 of this Statement that the Site is in a sustainable location for commercial development.

The Site constitutes a suitable strategic location for growth and is in close proximity to a significant quantum of new residential development. Development of the Site, through a comprehensive masterplanning exercise, will also ensure that the proposals are entirely compatible with and preserve the amenity of occupiers of neighbouring properties. The scheme will deliver a significant number of job opportunities for the local community and continue to contribute towards the mix of residential and commercial use that exists along the A582 corridor, which represents a sustainable approach to the growth of urban areas.

The Site is therefore confirmed as being suitable for commercial development.

Achievable

MGD have had regard to the technical considerations in respect of the future development of the Site for commercial purposes and it can be confirmed there are no significant issues that would affect the future development of the Site for employment development in the nature intended and that what is proposed is commercially viable and deliverable. MGD have a track record of working proactively and in partnership with local authorities and statutory consultees to address and overcome any technical issues which may emerge as sites progress through the planning system to achieve a prompt start on site.

The Site constraints assessment undertaken by MGD has informed the production of the Illustrative Masterplan which demonstrates the balance that has been struck between providing a sufficient quantum of commercial floorspace and mix of uses to ensure the Site is deliverable and the associated infrastructure requirements and mitigation measures required to ensure the requirements of all statutory consultees are satisfied and the amenity of neighbouring residents is preserved. An overview of these technical considerations is now provided.

Access and Movement

Highways and Road Network

Capacity: The Site is ideally situated to fully optimise the major highways infrastructure which the Council are proposing to significantly invest in and secure this area as a region for future growth. The major highway network improvements, particularly the focused improvement scheme at the Croston Road / A582 junction, alongside potential future dualling of the A582 will, as confirmed in Lancashire County Council, increase capacity on the A582, increase connectivity and reduce the commute time from this location to major infrastructure connections such as the M65 and M6, and promote the accessibility of sustainable transport from this location.

These are key factors when considering locations to focus growth for employment and business development due to the requirement for easy access to the strategic road network and confirms that commercial development in this location accords with the Council's vision in terms of delivering planned strategic growth.

It should be noted that the development of this site is achievable in terms of highways capacity regardless of the Croston Road junction improvements and potential dualling of the A582 and thus is not reliant on the outcome of the County Council's current planning application and their ability to secure funding. Regardless of these major improvements, the Site is currently in a very well connected location for such development.

Vehicular Access: A suitable vehicular access can be achieved from the south of the site along Flensburg Way (A582). The location of the access is proposed mid-way along the southern boundary of the Site where the layby is currently positioned. The northern boundary of Flensburg Way will remain in its current position as part of the proposed improvements to this road, therefore the location for the access does not depend on the success of these proposed works and can be fixed on this location.

At the moment Flensburg Way has a national speed limit, which for a single carriageway is 60mph. For a road of this speed a total length (deceleration lane, junction bell mouth, acceleration lane) of 215m is required based upon the Design Manual for Roads and Bridges as detailed within the supporting highways technical information submitted by Lancashire County Council. The dualling of the A582 may lead to an increase of this national speed limit to 70mph, which would require a distance of 305m and be too close to Lodge Lane to the east. Therefore, the retention of the 60mph speed limit along Flensburg Way is suitable to achieve a safe access to the Site. We understand that Lancashire County Council have proposed a limited of 50mph on Flensburg Way.

This is an appropriate solution in order to ensure that the Site along with the existing dwellings along Lodge Lane can safely be accessed from Flensburg Way. Flensburg Way has a good level of visibility west-facing due to the arc in the road allowing visibility for vehicles leaving the Site and turning east onto the carriageway, therefore sufficient visibility displays can be achieved to ensure safe access.

There is also the potential for a secondary access for the Site to be provided onto to the south and west of the site towards Goldcrest Avenue and Tank Roundabout (Flensburg Way / Penwortham Way / Goldcrest Avenue) through the wider A582 improvements that are being proposed by LCC. This will be reviewed in more detail at the appropriate stage and would be subject to design feasibility testing.



FIGURE 16 PENWORTHAM WAY

Internal Road Layout: The proposed plans also demonstrate an acceptable internal layout which complies with highways standards. The shape and scale of the Site also allows for an efficient internal layout, particularly for the access of large vehicles and will ensure that suitably sized plots can be formed within the Site for a variety of future users. The proposals identify the potential for a roundabout situated within the centre directly connected to the access and three other internal roads providing access to different parts of the Site.

Sustainable Connections: Section 5 of this Statement has demonstrated the accessibility of this location and confirmed that the Site is well connected to sustainable modes of transport and can provide significant improvements to local pedestrian and cycle infrastructure

Flood Risk and Drainage

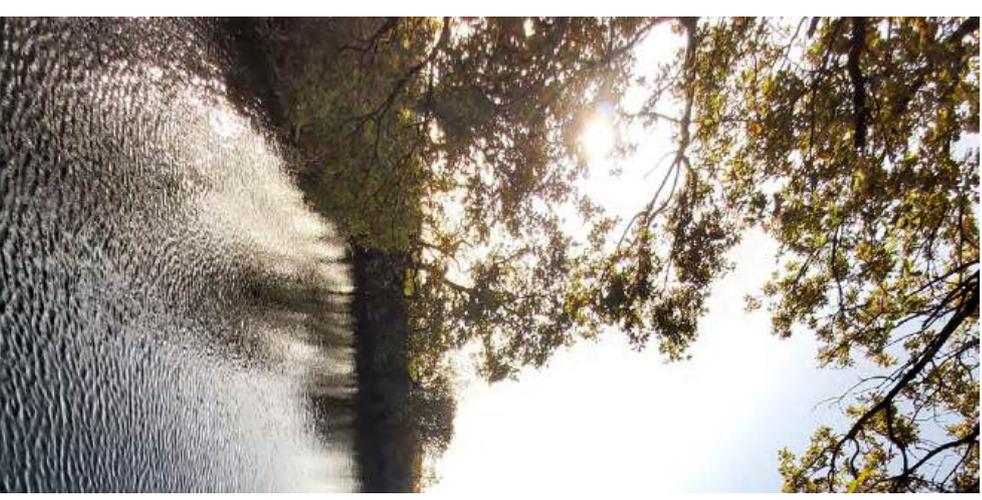
The Site is entirely within Flood Zone 1. There is currently a network of land drains and ditches present across the Site to ensure surface water drains from the flat agricultural fields in a sustainable manner. The drains also run along the western edge of Lodge Lane to ensure there is no runoff into this road from the Site and due to the presence of adjacent developed sites such as the Recycling Centre and the dwellings along the east of Lodge Lane, it is understood there is existing drainage infrastructure for surface water runoff which the development could connect to if required.

The north of the Site is adjacent to a small pond area which sits at the base of the elevated railway line. This area acts as a basin for any surface water runoff from the raised railway line and also from the Site.

The proposals for the Site incorporate internal landscaping corridors and the potential for a drainage pond connecting to these landscape features provides a highly effective sustainable drainage solution to ensure any additional surface water can be drained appropriately and avoids any risk from flooding.

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The proposals for the Site incorporate internal landscaping corridors and the potential for a drainage pond connecting to these landscape features provides a highly effective sustainable drainage solution to ensure any additional surface water can be drained appropriately and avoids any risk from flooding.



Landscape Character

Matters relating to the current Green Belt and Area of Separation planning policy designations have been comprehensively assessed within Section 6 of this Statement.

The Site is not covered by any specific national or local landscape designations. The existing character of the Site and the surrounding area is a mix of agricultural fields, residential areas and commercial uses. The landscape character of the Site itself is enclosed and insular given the strong boundaries which contain the Site and there is a limited association with the wider countryside. The landscape character of the surrounding area is also to change considerably as the approved housing developments progress and the dualling of the adjacent carriageway is implemented.

A comprehensive landscape strategy is to be integrated into the development proposals, which will also relate to the landscape features proposed as part of the dualling of Flensburg Way and Penwortham Way and can be summarised as follows:

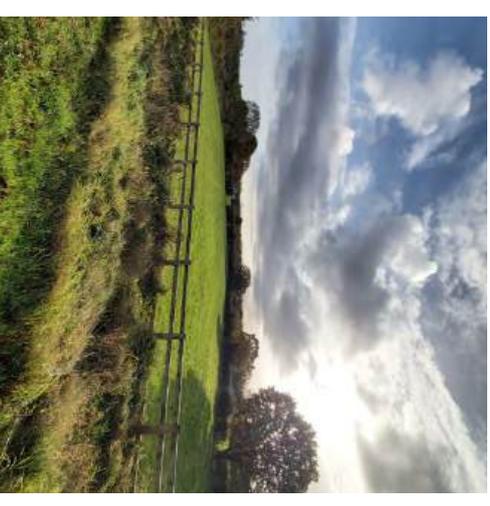
- Landscape buffer within the eastern boundary of the Site ranging from 15m to 20m to create a stand-off from the homes situated along Lodge Lane, mitigating any amenity or visual impacts;
- Landscape Corridors through the Site allowing for the possibility of sustainable drainage features and visual separation between the different units;
- Verges and grassed areas will be proposed where possible internally and on the boundary of the Site, enhancing overall visual amenity; and
- Tree planting around the Site perimeter will help to reinforce the defensible boundaries that exist and soften the appearance of the development, helping to create a better transition between the built-up area and open countryside to the west.

Trees and Ecology

Preliminary ecological and biodiversity assessments have been undertaken by Urban Green to identify habitats on site and determine the sites potential value for protected and/or notable fauna and flora, with the addition of potential impacts on designated sites the existing biodiversity value of the Site, present recommendations to maximise biodiversity through the development and inform further surveys and mitigation to minimise potential impacts of development on the Site.

These assessments have confirmed that the Site comprises predominantly cattle-grazed modified grassland, with native hedgerows and small areas of hardstanding and woodland, it is not covered by any national or local biodiversity designations. There are opportunities to enhance the condition of woodland to the east of the Site to increase species diversity, enhancing areas of retained grassland through wildflower planting alongside the creation of mixed scrubland and planting of new individual trees on site.

An Arboriculture Assessment has also been undertaken by Urban Green to inform the design of the scheme confirming that the majority of trees and hedgerows on the Site are around the perimeter and can largely be retained. Opportunities exist for new tree planting along the perimeter edge and within the plot boundaries of the Site, whilst the creation of new hedgerows through the development proposals will also support enhancement of biodiversity on the Site.



Noise and Light Pollution

The commercial development has the potential to increase the level of noise and light pollution emitted from the Site. The only sensitive uses adjacent to the Site are the residential dwellings situated along Lodge Lane to the east. A substantial landscape buffer is to be retained and enhanced along the eastern boundary to mitigate any amenity impacts upon these properties and other mitigation measures identified within the noise survey and lighting assessment will also be incorporated into the final scheme designs.



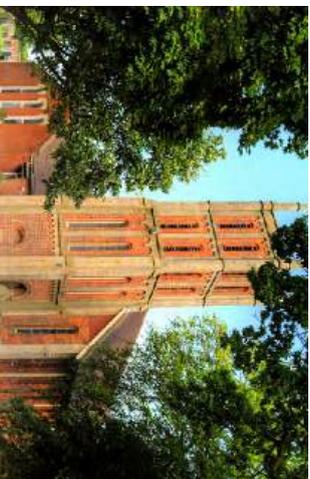
Utilities and Services

Evidently there are utility networks available within the surrounding area that support the extensive residential and commercial uses in the locality. Development on the Site would be able to connect to the existing utilities networks and upgrades can be delivered where necessary to provide the required capacity to serve the new units.



Heritage

The nearest designated heritage asset is the Grade II Listed Church of St Paul's which is 650m north east of the Site and there are no direct views possible between the two locations. In addition, there are no conservation areas within close proximity of the Site. Development of the Site would not therefore harm the setting of any designated heritage assets including Conservations Areas and Listed Buildings.



Ground Conditions and Topography

The terrain is generally flat and there are no topographical constraints that need to be taken into account within the design of the layout; furthermore given the historical use of the Site for agricultural purposes there is no evidence to suggest the ground will be contaminated or unsuitable for development.

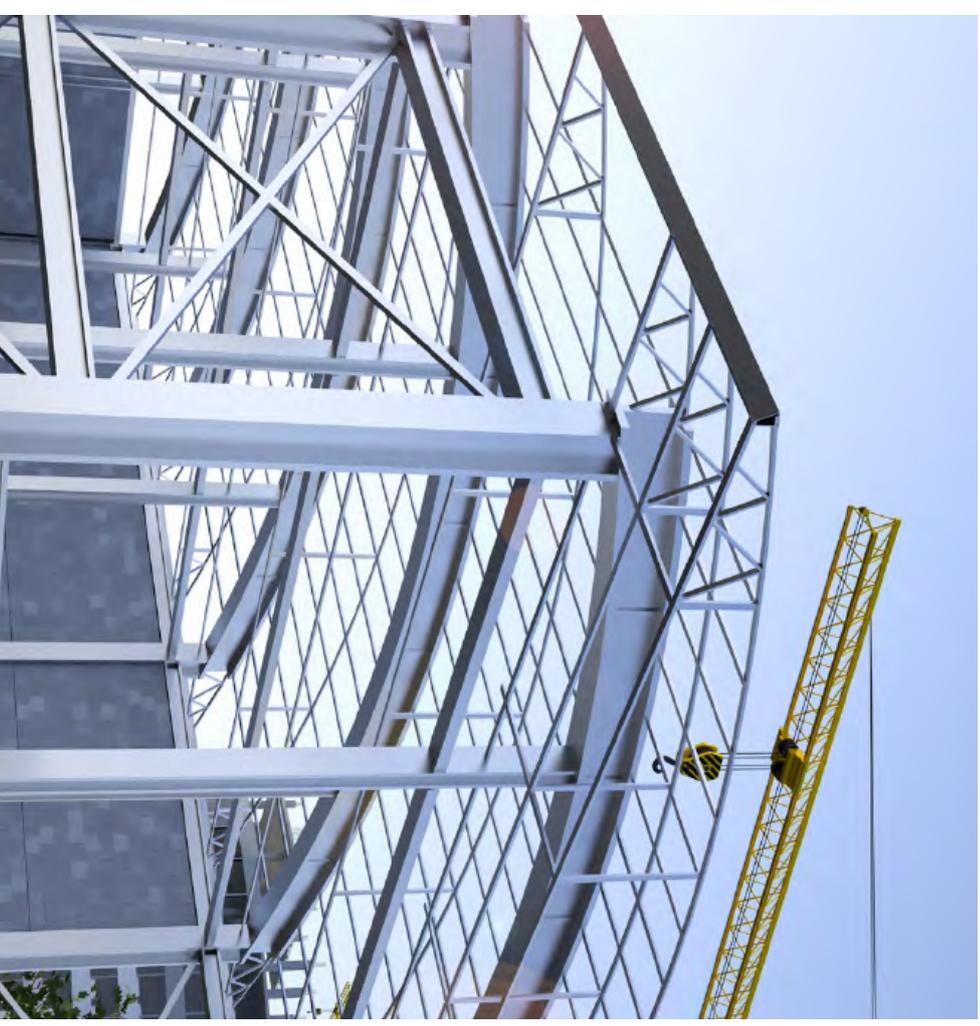
Taking the above factors into account, it is evident that the delivery of an employment-led development on the Site can be considered to be achievable.



Viability

National planning policy guidance is clear that assessing the viability of plans does not require individual testing of every site to determine viability. Notwithstanding, MGD have promoted, pursued planning permission, then built out and managed or disposed of a large number of commercial developments across the north west. This in-depth knowledge of the local land market provides significant confidence around the viability of this Site.

There are no significant technical or legal issues affecting the delivery of the Site. The Site typology (greenfield status, size, location and proposed land use) is very similar to a number of other sites that MGD have successfully brought to the market, where a significantly positive land value has been achieved as well as being fully policy compliant on developer contributions (where required) and complying with the original planning consent. As such, a detailed viability assessment or detailed viability evidence is not considered necessary as it is evident that the Site is viable.



9 Illustrative Masterplan & Design Principles

An Illustrative Masterplan has been prepared by AEW Architects that demonstrates how the Site could be delivered for employment-led mixed use development. This section explains the scheme proposals in a little more detail and sets out the key design principles.

Site Characteristics

The findings of survey and appraisal work undertaken to date has established there are no known major constraints which would preclude the development of the Site. A summary of the Site and contextual considerations which have shaped the Illustrative Masterplan is as follows:

> Landscape and Visual Impacts

To address the transition between the built form and the adjoining open landscape, there is the opportunity to strategically position units of varying scale and size across the Site to facilitate this transition and minimise any impacts on the wider landscape. Furthermore, a landscape strategy to be developed alongside a masterplan for the Site that will protect the existing relationship with the surrounding landscape.

> Amenity Considerations

The presence of residential dwellings along the north of Lodge Lane requires the Illustrative Masterplan to ensure there will be limited emissions (light, noise and dust) and visual impact upon these properties. This has been reflected within the Illustrative Masterplan through the siting of more compatible uses and smaller units on the east and south east of the Site, however a more detailed landscape strategy and assessment will comprehensively demonstrate how these potential impacts can be effectively mitigated against.

> Highway access

Flensburg Way across the south of the Site provides the opportunity for a suitable and safe access point onto the highway network. The scale and shape of the Site lends itself to bringing forward an efficient layout for employment development with a suitable internal road hierarchy that meets the required highway standards and presents a reasonable layout to allow the manoeuvring of Heavy Goods Vehicles and sufficient parking spaces to prevent a proliferation of on-street parking.

There is also the potential for a secondary access for the site to be provided onto to the south and west of the site towards Goldcrest Avenue and Tank Roundabout (Flensburg Way / Penwortham Way / Goldcrest Avenue) through the wider A582 improvements that are being proposed by LCC. This will be reviewed in more detail at the appropriate stage and would be subject to design feasibility testing.

> Trees and Ecology

The majority of trees and hedgerows on the Site are around the perimeter and can largely be retained, however there is a small number of trees and hedgerows within the Site that are likely to be lost to facilitate the development of the Site. Opportunities to enhance biodiversity can be incorporated through the development proposals to improve the condition of existing woodland and create new hedgerows and wildflower planting to increase species diversity. A comprehensive landscape strategy will be implemented that will allow for a planting scheme to enhance the number and quality of trees and hedgerows on the Site, which will then provide habitat and foraging opportunities for biodiversity. It is expected that no off-site mitigation will be required for these habitat types based on the preliminary masterplan and landscape designs.

Site Opportunities and Design Principles

The Opportunity

This Site provides an opportunity to deliver a mix of high quality business and industrial accommodation to meet growing demand in South Ribble.

This is a highly a sustainable and well connected location that meets the market requirements for industrial and logistics occupiers. There is also the opportunity to deliver a more balanced mix of employment accommodation at a range of scales with flexibility built in to the masterplan to allow for changes in future market demand, that help to create a complementary offer to the large format logistics offer provided along the M6 corridor, rather than competing with it.

An attractive and high quality employment and business park is to be delivered at the Site that will contribute towards delivering new job opportunities and economic growth in South Ribble.

Key Design Principles

The limited site constraints have been taken into account and a number of opportunities present themselves which have been taken into account when producing the Illustrative Masterplan:

1. Deliver high quality and attractive employment accommodation to meet local needs, allowing for flexibility in the phasing and nature of accommodation to meet market demand.
2. Incorporate a high quality landscape strategy within the layout to:
 - a) mitigate any landscape, visual or amenity impacts
 - b) enhance the biodiversity value of the Site
 - c) promote an attractive development with a strong relationship between the built and natural environment
 - d) ensure replacement planting for any trees or hedgerows lost as part of the development
 - e) contribute towards the provision of a sustainable drainage system for the Site

3. Through the scaling, massing, and positioning of structures, the design will look to create a built form that is sensitive to its surroundings.

Illustrative Masterplan and Proposed Scheme

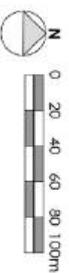
The Illustrative Masterplan demonstrates how the Site could be developed for an employment-led mixed use scheme in a way that responds positively to the market opportunity that exists, site specific constraints and the design vision.

The Illustrative Masterplan demonstrates that the Site has capacity to deliver c.350,000 sq ft (32,000 sqm) of new employment and commercial floorspace. The units vary in size and comprise of ten individual industrial or logistic units ranging from 22,000 sq ft (2,000 sqm) to 80,000 sq ft (7,500sqm), with the capability to be sub-divided to respond to market demand and provide opportunities for smaller units for SMEs and start up businesses.

To complement the employment uses, there is also the opportunity to utilise the Site's location on the strategic road network and create an attractive frontage to the development by introducing 'road side' uses ranging from 4,500 sq ft (413sqm) to 6,500 sq ft (600 sqm). Road side uses could include a Petrol Filling Station, Family Pub or Drive Thru.

The Masterplan will evolve as more technical survey work is undertaken and through engagement with key stakeholders such as South Ribble Council, statutory consultees and the local community.

FIGURE 47 ILLUSTRATIVE MASTERPLAN



Key features of the Illustrative Masterplan are summarised as follows:

Vehicular Access: There are several options for vehicular access to the Site, including the centre of the southern boundary from Flensburg Way where the lay-by is currently situated.

➤ **Internal Road Hierarchy:** The access point will connect to a roundabout in the centre of the Site which will provide three primary internal access roads (east, west and north west). It is envisaged that the larger units will be situated to the north west of the roundabout, whilst the smaller sized industrial units will be situated to the west of the roundabout and the road side units to the south east. Off each of the three primary internal access roads each unit will be accessible via secondary roads connecting to the parking area in front of or alongside each unit, whilst loading yards are generally located to the rear. This provides a definitive internal road hierarchy with safe access and egress from each unit to Flensburg Way.

The roundabout allows for the separation of larger (HGV's) vehicles typically accessing the larger industrial units from the smaller vehicles (cars) accessing the road-side units.

➤ **Parking Provision:** It is anticipated that around 600 car parking spaces could be accommodated, as well as making allowance for the necessary quantum of accessible parking spaces for disabled users. The car parking provision is provided to adopted standards to serve each unit.

➤ **Pedestrian Movement:** Footpaths are to be provided on both sides of the internal roads up to the point of the primary pedestrian access to each unit to allow for safe walking movements throughout the site. The pedestrian access to the Site will be shared with the vehicular access point, with no cut-throughs along the east boundary to Lodge Lane to reduce the potential for crime or anti-social behaviour and to maximise the potential for biodiversity enhancements along this perimeter.

General Arrangement: The smaller industrial units are proposed to the south, centre and east of the Site, whilst larger structures are located towards the north and west. This will create a transition in the scaling and massing of structures across the Site, with the smallest structures in the more visually prominent south east corner and the largest units to the north which will be extremely well screened by existing and proposed vegetation.

This approach responds to the visual and landscape characteristics of the Site.

Landscape and Planting: Existing trees and hedgerows around the perimeter of the Site will be retained wherever possible as they provide valuable screening, especially along the western boundary alongside the ecological value. The key feature of the new landscape proposals is the buffer ranging between 15m to 20m proposed along the east of the Site fronting onto Lodge Lane, which will help to mitigate any visual or amenity impacts upon the occupiers of the adjacent dwellings.

New tree planting and landscaping is then proposed throughout the Site, which will be designed in conjunction with the drainage strategy which will seek to integrate sustainable drainage measures.

10 Summary and Conclusions

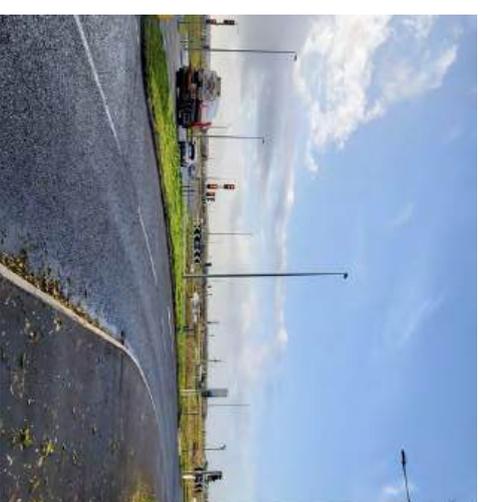
The land at Flensburg Way and Penwortham Way represents an opportunity for the development of approximately 350,000 sq ft (32,000 sqm) high quality and flexible employment and commercial space to meet an evidenced need.

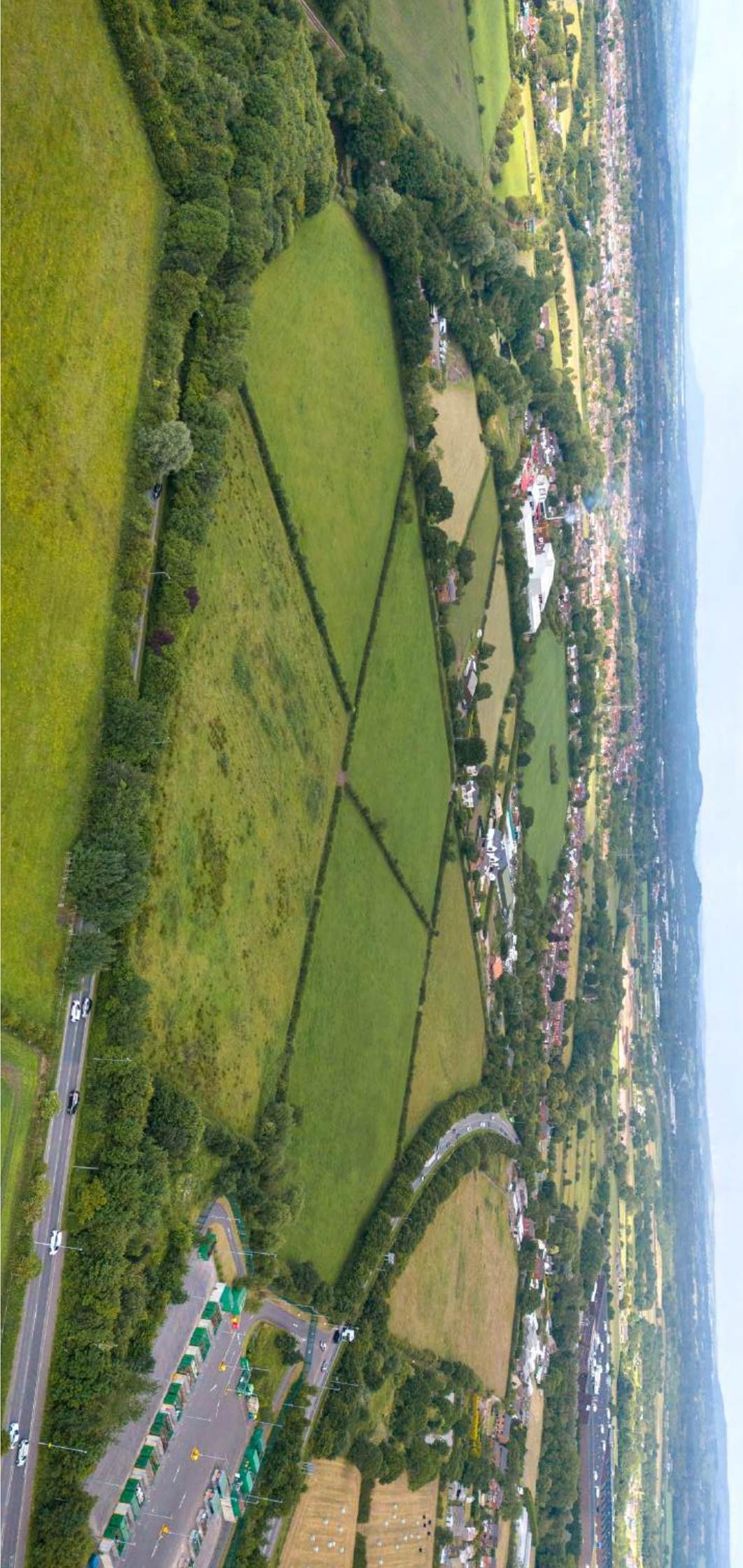
The Illustrative Masterplan demonstrates that the proposed development can be delivered on the Site by responding positively to the site-specific constraints and ensuring a high quality development that successfully integrates the built and natural environment.

This Development Statement has demonstrated that:

- The Central Lancashire Employment Land Study 2017, 2019 and the 2022 updates confirms that South Ribble has a further need of 25,68ha of additional employment land against the backdated supply for the plan period to 2038. This need cannot be accommodated on suitable land within the existing urban areas or on land that is not currently Green Belt and so exceptional circumstances exist to release land from the Green belt in order that future employment land requirements can be met in full.
- When considered against the five purposes for including land within the Green Belt set out at paragraph 143 of the NPPF, the Site makes between a 'Low Contribution' and 'No Contribution' and so release of the land from the Green Belt can be justified.
- The Site's removal from the Green Belt can also be justified in the context of its designation as an Area of Separation in the South Ribble Local Plan (AS3 - Between Farington, Lostock Hall and Penwortham) as land to the south of Flensburg Way is to remain in the Green Belt that will still fulfil this function. The urbanised nature of the Green Belt immediately adjacent to the Site further justifies its removal and appropriateness for development.
- There are a limited number of physical and technical constraints associated with the Site that would restrict development.
- The Illustrative Masterplan presents a deliverable layout that responds to the Site's opportunities and constraints and achieves the design vision.

The land at Flensburg Way and Penwortham Way is being promoted by Maple Grove Developments who are a locally based developer with a long established track record of delivering high quality employment accommodation in Lancashire and the North West and so this provides the assurance that what is being proposed is both deliverable and viable.





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