



**Central Lancashire Local Plan  
Regulation 19 Consultation**  
Representation in respect of land at Mellor Brook

On behalf of **Blackburn with Darwen Borough Council**

Project Ref: 332612565 | Rev: - | Date: April 2025

---

Registered Office: Stantec House, Kelburn Court, Birchwood, Warrington WA3 6UT  
Office Address: 100 Barbirolli Square, Manchester M2 3PW  
T: +44 (0)161 245 8900 E: [manchester.uk@stantec.com](mailto:manchester.uk@stantec.com)

## Document Control Sheet

**Project Name:** Representation in respect of land at Mellor Brook

**Project Ref:** 332612565

**Report Title:** Response to the Central Lancashire Local Plan Regulation 19 Consultation

**Date:** April 2025

|  | Name          | Position | Signature | Date       |
|--|---------------|----------|-----------|------------|
| <b>Prepared by:</b>                            | Bernard Greep | Director | BG        | April 2025 |
| <b>Reviewed by:</b>                            | Bernard Greep | Director | BG        | April 2025 |
| <b>Approved by:</b>                            | Bernard Greep | Director | BG        | April 2025 |
| <b>For and on behalf of Stantec UK Limited</b> |               |          |           |            |

| Revision | Date | Description | Prepared | Reviewed | Approved |
|----------|------|-------------|----------|----------|----------|
|          |      |             |          |          |          |
|          |      |             |          |          |          |

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

## Contents

- 1 Introduction and Summary of Our Objections .....1**
  - 1.1 Introduction .....1
  - 1.2 Summary of Our Objections.....1
- 2 Policy Context .....4**
  - 2.1 Introduction .....4
  - 2.2 NPPF and PPG.....4
  - 2.3 Blackburn with Darwen Local Plan, adopted January 2024 .....4
  - 2.4 Draft Lancashire Growth Plan 2025-2035.....4
- 3 Development Statement, Indicative Concept Masterplan and Green Belt.....8**
  - 3.1 Introduction .....8
  - 3.2 A Sustainable Option for Growth.....8
  - 3.3 Green Belt.....9
  - 3.4 Grey Belt..... 11
  - 3.6 Locational Advantages..... 15
- 4 Specific Policy Objections ..... 16**
  - 4.1 Introduction ..... 16
  - 4.2 Plan Period ..... 16
  - 4.3 Spatial Vision, Strategic Objectives and Policy SS1 Development Patterns..... 16
  - 4.4 Policy SS2 Settlement Hierarchy ..... 17
  - 4.5 Policies SS3-SS6 Strategic Site Allocations ..... 17
  - 4.6 Policy HS1 Scale of Housing and Distribution ..... 17
  - 4.7 Policy EC1 Scale of Economic Growth ..... 18

## Appendices

**Appendix A: Development Statement, April 2022**

**Appendix B: Blackburn with Darwen Borough Council Submissions to the Central Lancashire  
Local Plan Regulation 18 Consultation, February 2023**

This page is intentionally blank

# 1 Introduction and Summary of Our Objections

## 1.1 Introduction

- 1.1.1 This representation to the Central Lancashire Regulation 19 Local Plan ('the Plan') is made by Blackburn with Darwen Borough Council ('the Council') in its twin roles as a neighbouring local planning authority and as the sole owner of a significant parcel of land at Mellor Brook ('the land' or 'the subject land'), located within the A59 corridor running east from J31 of the M6 motorway. The land is adjacent to the Samlesbury Enterprise Zone and Innovation Hub, the BAE Systems Samlesbury operations site, the village of Mellor Brook and the A667 (Preston New Road).
- 1.1.2 The Enterprise Zone and Innovation Hub, and the BAE Systems site, collectively form a strategic and highly successful economic cluster specialising in the fields of advanced engineering and manufacture, science and technology and cyber. The cluster generates significant numbers of highly skilled, high value jobs, and the Enterprise Zone is also the proposed home of the National Cyber Force HQ.
- 1.1.3 The north-eastern section of the subject land also encompasses an allocated residential site, which is shortly to be the subject of an outline planning application for 120 new homes.
- 1.1.4 The representation follows and builds upon the Council's Call for Sites submission in 2022 and the Council's response to the Regulation 18 Local Plan consultation in February 2023. Our current submission also draws upon and refers to the Council's April 2022 Development Statement (enclosed within Appendix A), which was submitted previously and includes an indicative concept masterplan showing how sustainable economic uses, new homes and supporting community facilities could be accommodated at the site. Whilst the masterplan also includes a parcel of land south of the A667, this land is not specifically covered by our current representation as it is not in the sole ownership of Blackburn with Darwen Borough Council.
- 1.1.5 The structure of this representation is as follows:
- in this section we summarise our objections to the Plan;
  - in Section 2 we describe the relevant national and local planning policy context underpinning our objections to the Plan;
  - in Section 3 we summarise the indicative concept masterplan previously submitted and demonstrate that there are exceptional circumstances to justify release of the subject land from the Green Belt to allow it to come forward as a sustainable form of mixed use development; and
  - in Section 4 we describe and justify our specific objections to particular sections and policies in the Plan.

## 1.2 Summary of Our Objections

- 1.2.1 We have fundamental objections to the Plan. We show in our representation that the Plan's vision and strategic objectives pay insufficient heed to the national political and planning imperative to stimulate and enable sustainable economic and housing growth. We also show that the Plan's policies and allocations are not sufficiently ambitious to deliver against that imperative, because they do not:
- a) demonstrate with evidence that the spatial strategy is deliverable over the Plan period, will meet the varied and significant full employment and housing needs of the area and will

avoid an under-supply of land for new employment and homes. In these respects, the Plan conflicts with paragraphs 11 a), 11 b), 20-23, 36, 61, 62, 69 and 85-87 of the NPPF;

- b) acknowledge that, given the scale of those needs and the absence of sufficient available urban or previously developed land, exceptional circumstances exist whereby it is necessary to release Green Belt land, prioritising grey belt sites which conform with sustainable patterns of development, in accordance with paragraphs 145 to 149 of the NPPF; and
- c) adequately recognise the strategic importance, economic strengths, success in attracting investment and potential for further growth of the 'cyber corridor' between Lancaster and Manchester (including the M6-A59 corridor and the Growth Axis linking Samlesbury, Blackburn town centre and the M65). In this context, the Plan also pays inadequate regard to the fundamentally important role within the cyber corridor played by the high value economic cluster comprising the Samlesbury Enterprise Zone and Innovation Hub and the adjoining BAE Systems site, and the need to plan positively for the future consolidation and sustainable expansion of this cluster in the form of complementary employment and residential growth. In these respects, the Plan conflicts with paragraphs 85-87 of the NPPF, the adopted Blackburn with Darwen Local Plan and the objectives of the Lancashire Growth Plan.

1.2.2 For the above reasons, the Regulation 19 Plan fails to meet all four of the 'soundness' tests for Local Plans specified within paragraph 36 of the NPPF, because it would not be:

- positively prepared, in that it fails to provide a strategy which, as a minimum, meets objectively assessed housing and employment needs across the Plan area;
- justified, in that the appropriate strategy would instead be to meet those minimum needs in full;
- effective, in that there is insufficient evidence to show that the allocated housing and employment sites are fully deliverable within the Plan period and because joint working with Blackburn with Darwen Borough Council on cross-boundary strategic matters has not been fully effective in that insufficient regard has been had to the relationship between the Samlesbury Enterprise Zone and the Spatial Strategy within the Council's adopted Local Plan, particularly its emphasis on a Growth Axis running from the Enterprise Zone, through Blackburn town centre to the M65; and
- consistent with national policy in the NPPF, as already described above.

1.2.3 As a result, the Plan should not proceed to formal submission stage. Instead, in accordance with paragraph 148 of the NPPF, a detailed Green Belt review should be carried out to identify potential further housing and employment allocation sites, with priority given to previously developed land and grey belt locations which promote sustainable patterns of development. The result will be a revised Plan which is sound and robust in allocating sufficient land to meet objectively assessed housing and employment needs in full over the whole Plan period, thereby also maximising the economic potential of the Plan area at the same time.

1.2.4 As part of this Green Belt review process, our representation shows that the subject land at Mellor Brook does not perform a strong role in respect of Green Belt purposes a), b) and d) as set out within paragraph 143 of the NPPF. The subject land therefore constitutes 'grey belt' as defined by the NPPF.

1.2.5 The Development Statement within Appendix A also shows, by reference to factors such as its public transport accessibility, the proximity and synergy between jobs and homes which would attract investment and minimise commuting and the provision of a new local centre, and how development of the subject land would constitute a sustainable pattern of development as required by paragraph 148 of the NPPF.

- 1.2.6 In order to help to meet employment and housing needs generally and maximise the economic strengths and growth potential of Samlesbury specifically, the subject land should therefore be identified for sustainable and strategic mixed-use development which will help to consolidate and expand the existing economic cluster, complementing both the Enterprise Zone and Innovation Hub and the BAE Systems operations, and incorporating employment, residential and other community/commercial uses.
- 1.2.7 In this way, in accordance with paragraphs 85-87 of the NPPF and having regard to the local policy context described fully in Section 2 below, advantage could be taken of the successful track record and synergies of the existing cluster, such that economies of scale could be delivered, future investment secured and significant numbers of new, high value jobs created.
- 1.2.8 At the same time, in order to address any concern that such a form of development of the subject land would somehow prejudice the delivery or operation of the Enterprise Zone, we propose that a phasing or other similar policy mechanism could be considered, so that the subject land would not be developed for employment purposes until such time as the comprehensive delivery of development within the Enterprise Zone had been confirmed or committed.
- 1.2.9 For all of the reasons outlined above, we conclude that, in accordance with paragraph 145 of the NPPF, there are exceptional circumstances to justify release of the subject land from the Green Belt and its allocation as a strategic site for mixed use employment and residential uses within Chapter 3 of a revised Plan.

## **2 Policy Context**

### **2.1 Introduction**

2.1.1 The national and local political and planning agendas underpinning our objections revolve around the critical need to stimulate and deliver economic and housing growth, as demonstrated by the following examples of key policy documents.

### **2.2 NPPF and PPG**

2.2.1 Throughout this representation, we make specific references to particular relevant paragraphs within the NPPF and the associated PPG, and so we do not reproduce them here.

### **2.3 Blackburn with Darwen Local Plan, adopted January 2024**

2.3.1 The adopted Local Plan proposes a balanced growth strategy and Core Policy 2 sets out the six key ideas on which that strategy is based. The first concept is the Blackburn Growth Axis; an economic framework of strategic and local development sites and opportunities that link the M65, key growth corridors and Samlesbury Enterprise Zone, a future economic driver of the Borough, with Blackburn Town Centre.

2.3.2 Whilst the Samlesbury Enterprise Zone is not within Blackburn with Darwen Borough Council's administrative area, as described above it is integral to the Blackburn Growth Axis and fundamental to the Council's economic framework and growth strategy, which is based on support for economic growth and includes a cyber and skills campus in Blackburn Town Centre, significant Green Belt release in the form of a new strategic employment site at J5 of the M65 and a strategic housing allocation (some 1,500 dwellings) at North-East Blackburn.

2.3.3 The Samlesbury Enterprise Zone is just 3km from the Blackburn with Darwen borough boundary and 7km from the centre of Blackburn, the closest large town to the site. As such, future development at the site is likely to attract a large proportion of its workforce from the Blackburn with Darwen area.

2.3.4 Blackburn with Darwen Borough Council supports the strategic economic and national role performed by the Enterprise Zone – especially through the growing presence of the new National Cyber Force HQ and AMRC, and the on-going growth of BAE Systems – and its strategic importance as a key location of the Northern Cyber Corridor. The proximity of the subject land to Blackburn with Darwen is clearly advantageous, allowing the Council to connect with it and to leverage further growth.

### **2.4 Draft Lancashire Growth Plan 2025-2035**

2.4.1 Consultation took place between February and April 2025 in respect of this crucially important Draft Growth Plan, published by the recently established Lancashire Combined County Authority, under the title 'Powering innovation to drive economic growth'. The following extracts all show the importance of securing significant future economic growth in the County's established and emerging key high value sectors and the critical future role to be played in this regard by the consolidation and expansion of the strategic economic cluster already established at the Samlesbury Enterprise Zone and adjoining land. The Growth Plan also highlights the need for housing growth in locations complementary to such economic growth clusters.

2.4.2 The Draft Plan's foreword begins as follows:

*'It's Lancashire's time. In a rapidly changing world, with new leadership and governance locally and nationally, this Growth Plan provides a platform to restate our ambition, our potential, our innate strengths and the unique contribution we can make to our national growth mission... There is a strong correlation between the sectors identified in our Growth Plan and those highlighted in the emerging national Industrial Strategy, including Advanced Engineering & Manufacturing, Clean Energy, and Digital. Lancashire is well placed to contribute to regional and national efforts to fully realise the global opportunity presented in these areas.'*

- 2.4.3 Section 4 ('Spatial Priorities') focuses on 'Key clusters, and corridors to enhance economic connectivity and collaboration', stating that:

*'We have identified Lancashire's Central Belt, which runs along the M55-M65 corridor, anchored by Blackpool, Preston, Blackburn and Burnley, as our primary economic focus. This area encompasses most of Lancashire's major employment zones, largest population centres, and strategic business innovation assets. The west / east corridor is vital for the movement of workers and goods, with Preston serving as a crucial north / south transport hub. The Central Belt is a key location within the emerging north / south cyber corridor linking Lancaster, Sarnesbury and Manchester...'*

*The Central Belt includes several major economic clusters, such as the Enterprise Zones at... Sarnesbury (between Preston and Blackburn), along with the Blackburn Growth Axis. Our Plan also includes substantial urban growth and regeneration opportunities in... Blackburn (including Blackburn Cyber and Skills Campus)...*

- 2.4.4 Section 5 ('A Framework of Nationally Significant Economic Assets') refers, under 'Specialisms and sub-sectors', to the importance of BAE Systems (including its operations at Sarnesbury) in generating significant numbers of highly skilled jobs with high productivity, at key locations across Lancashire's Advanced Engineering & Manufacturing Corridor. Section 5 also confirms that:

*'The UK Government's new National Cyber Force (NCF) was announced in November 2020, as part of the Integrated Review. A joint MoD and GCHQ partnership, it will establish a permanent base in Sarnesbury in 2025. While details about its deployment are sensitive, commissioned research and publicly available information suggest a personnel base of 2,000 people, including wider partners. This could result in an estimated 3,120 direct and indirect jobs and a GVA contribution of £112.6 million. The introduction of enhanced digital and cyber skills into the Lancashire economy offers significant potential for collaboration and innovation.'*

- 2.4.5 Section 6 ('Foundations for Growth'), under 'Housing', states that:

*'There are nationally significant sectors and employment hubs within Lancashire, most notably focused on clean energy, defence, and cyber. Many of these sectors are benefiting from major investment programmes. Harnessing these to their fullest potential will require local housing markets to respond with an improved housing offer that is sufficiently diverse to attract high- skilled workers and break down the skills and transport barriers that prevent social mobility and inclusive growth. Supporting housing growth locations, in conjunction with robust Local Plans, offers the potential for improved productivity across the county and could help intensify the use of existing infrastructure, drive regeneration and place-making across towns and cities, and make a significant contribution to the region's transition towards a clean energy, Net Zero future.'*

*The LCCA, in working in conjunction with local planning authorities, and by engaging key partners such as Homes England, creates the potential to substantially increase, renew, and diversify the housing stock within the county. It can help the pre-existing regional house building industry to do more and attract major investment to accelerate*

*other forms of house building projects, such as large-scale urban regeneration and new settlements. The modern workforce that Lancashire aspires to increasingly requires a more diverse housing offer that aligns closely with the strengths and potential of the county. Deploying new and future devolved powers and resources are key to achieving the form of joined-up economic and housing growth that can directly contribute to delivering the Government's growth missions and realising Lancashire's full potential.'*

2.4.6 Also in Section 6, under 'Higher and Further Education Assets', it is confirmed that:

*'The Advanced Manufacturing Research Centre (AMRC) is located at Samlesbury EZ and helps businesses adopt advanced technologies, boost productivity, and transition toward Net Zero goals...By fostering collaboration between industry, academia, and local partners, the AMRC NW drives economic growth and innovation, ensuring regional manufacturers remain competitive in a rapidly evolving global market.'*

2.4.7 Section 6, under the heading 'Key Employment Sites', further states that:

*'Recent work by Stantec consultants identified 30 of the most strategic sites in Lancashire in relation to future economic opportunities classifying them as 11 anchor and 19 complementary sites as part of a series of growth corridors.'*

*In this regard, Samlesbury Enterprise Zone was identified as one of the 11 anchor sites.'*

2.4.8 The red line boundary of the Samlesbury Enterprise Zone site that we assessed as part of the Lancashire Strategic Sites project is depicted in Figure 2.1, below. The graphic shows the excellent relationship of the Enterprise Zone with the subject land to the immediate east.

**Figure 2.1 Samlesbury Enterprise Zone site**



2.4.9 Under the same heading, the Draft Growth Plan also states that:

*'Although Lancashire has a good supply of strategic sites through to 2035 (subject to build out rates), this Growth Plan recognises that additional sites for the post-2035 period need to be planned for now and informed by up-to-date Local Plans of local authorities. These could include new strategic sites and /or extensions to the portfolio of existing strategic sites.'*

2.4.10 In Section 9, under the heading 'Proposed Signature Projects', the first project listed is the Samlesbury Enterprise Zone and Innovation Hub, as follows:

*'A site of international significance, Samlesbury Enterprise Zone can enable transformational economic growth for the whole of Lancashire. Designed to support advanced manufacturing and engineering, hi-tech and research-led sectors, including cyber, robotics and future flight, the 120-acre site is primed to become a hub of world-class innovation, Industry 4.0 processes, and disruptive R&D.*

*The site sits strategically at the heart of Lancashire and will act as an anchor development for several other emerging economic opportunities. These include the Preston Station Quarter, Blackburn's Cyber Skills and Education Campus and Innovation Quarter, and the wider M65 East Lancashire Corridor. The site is home to BAE Systems and the Advanced Manufacturing Research Centre North West (AMRC NW).*

*The location of the National Cyber Force provides opportunity to harness new corporates, SMEs and talent into the region. Funding to build the first phase of an Innovation Hub has been secured through devolution. This Hub will harness this potential by being the home to a series of programmes, funding initiatives and events to draw in new community members and establish Lancashire as the centre of cyber security technologies.'*

## **3 Development Statement, Indicative Concept Masterplan and Green Belt**

### **3.1 Introduction**

3.1.1 Enclosed within Appendix A is the Development Statement prepared for the subject land (and additional land south of the A667) in April 2022 and submitted with the Council's previous Call for Sites submission in 2022 and its representation to the Regulation 18 consultation in February 2023.

3.1.2 The Development Statement and its indicative concept masterplan show in detail how the land:

- is the most sustainable location for the next stage of managed growth adjoining and complementary to the Samlesbury Enterprise Zone;
- could be developed for high quality, mixed uses comprising strategic employment and residential development (in addition to the dwellings in the north-eastern part of the masterplan area, which are already the subject of an allocation for 120 homes in the adopted South Ribble Local Plan), including provision for affordable housing, a local centre, associated infrastructure and open space;
- is suitable for development because of its proximity to services and facilities, the connections that can be made to the existing built up area and the diverse range of nearby land uses;
- is well contained and influenced by strong features in the local built and natural landscape and would not give rise to any harmful visual or landscape impacts;
- has no technical, ownership or environmental constraints that would prevent development; and
- could provide opportunities for mixed use development in combination with a solar array installation to help meet the carbon neutral ambitions of Blackburn with Darwen Borough Council (the landowner) and the Plan.

### **3.2 A Sustainable Option for Growth**

3.2.1 The rationale for development immediately adjoining the Enterprise Zone is that it can help to supplement and expand the existing economic cluster, building on and complementing the high value employment generation (both existing and potential) of the Samlesbury Enterprise Zone, including the proposed National Cyber Force Campus, and the well-established BAE Systems operations, which also adjoin the Enterprise Zone.

3.2.2 This economic cluster will play a key role in anchoring and developing an advanced engineering and manufacturing, science and technology and cyber enterprise corridor linking to Lancashire's key universities and existing extensive capabilities in these fields. The cluster will also help to capitalise on new and emerging market opportunities and strengthen and grow local supply chains through inward investment and the modernisation of sectors. The cluster has the potential to create a substantial number of jobs, and the scope for further associated technology spin-out businesses, new business startups and SMEs is considerable.

3.2.3 The subject land provides an opportunity to create further employment development and new homes at scale, along with a local centre and community uses including shops, a primary school and a community hub. This is preferable to smaller, incremental developments

elsewhere. A critical mass of development can be achieved based on an intelligent approach to infrastructure delivery which will support a sustainable and lively community.

- 3.2.4 There is available land alongside the Enterprise Zone where new development could directly and demonstrably complement the existing and prospective businesses, including the National Cyber Force HQ, well related to established infrastructure, facilities and services.
- 3.2.5 The subject land is best placed to meet a longer-term need for economic development and associated communities. New development here can be integrated with existing and proposed development at the Enterprise Zone and with the settled built structure of Mellor Brook.
- 3.2.6 Moreover, the land within Blackburn with Darwen Borough Council's control presents a significant opportunity to introduce land uses and activities which will add value and strength to the Enterprise Zone and to Mellor Brook. They are neighbouring places which are only loosely tied together at present. A comprehensive approach to new development around the subject land is an opportunity to create a more significant and sustainable mix of uses, tying existing disparate development together into a consolidated whole.

### 3.3 Green Belt

- 3.3.1 When the Development Statement was being worked up in the first few months of 2022, the Local Plan was at an early stage of its production and the Development Statement pre-dated the Central Lancashire Green Belt Assessment, which was not published until October 2022. Accordingly, the Development Statement did not contain a comprehensive review of the subject land against the Green Belt purposes, although it did contain high-level comments regarding the site's very limited Green Belt role, including the following:
- The site's containment by strong features in the local landscape, and existing development, was highlighted in textural form as well as via the image provided as Figure 2.
  - Figures 2, 5 and 6 also showed the land that is already allocated for residential use within the north-eastern part of the site, which effectively represents a western extension of Mellor Brook.
  - The document explained the strong locational sustainability of the site and, against that background, Section 4 explained that any Green Belt release should be in the right place and based on a robust review of all land within the Green Belt, and the extent to which that land meets the objectives and purposes of including land in the Green Belt.
  - Section 5 of the Development Statement explained that the site is located within Flood Zone 1 and that, aside from its location within the Green Belt, is not covered by any other restrictive designations such as SSSI and protected landscapes.
  - Section 6 of the document explained that the subject land, as well as being located adjacent to built and proposed development, is sandwiched between two strategic road links, namely the A59 to the north and the A677 to the south.
- 3.3.2 Following publication of the Central Lancashire Green Belt Assessment in October 2022, Blackburn with Darwen Borough Council submitted two representations to the Local Plan Regulation 18 Part One: Preferred Options Consultation. Those submissions are reproduced in full within Appendix B for ease of reference but key points that we wish to highlight here in relation to Green Belt are as follows<sup>1</sup>:

---

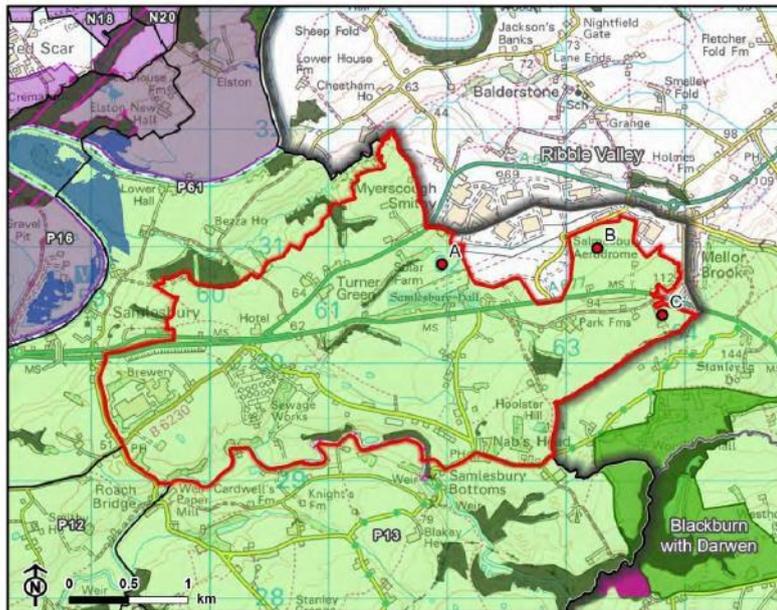
<sup>1</sup> The Council's earlier representations ""referred to the subject land as 'Lower Intack' but, on reflection, it is better described as 'Land at Mellor Brook'.

- The subject land falls within Green Belt Parcel P14, as defined within the Green Belt Assessment, and the Enterprise Zone and Mellor Brook are inset developments in the Green Belt.
- The Assessment concludes that *'no land within the area contained by the Enterprise Zone, Mellor Brook and the A677 has strong distinction from urbanising development.'* That is the subject land. The Council's representation explained that, as a consequence, the release of the land from the Green Belt would not cause encroachment into the countryside.
- In contrast, the Green Belt Assessment concludes that any development which is physically and visually well removed from the inset Enterprise Zone and Mellor Brook would constitute a significant encroachment on the countryside (thereby being harmful to the third Green Belt purpose).
- The representation reiterated the other locational advantages of the subject land that we highlight elsewhere within our current submission, which make it a strong candidate for meeting development needs.
- The core characteristics and benefits referred to in the Council's early representations, when considered alongside the outcome of the Green Belt Assessment, point to a strong and justified need to support the release of the subject land as a strategic location for growth, in preference to less sustainable sites elsewhere.
- For the same reasons, the Council outlined its strong belief that the Regulation 18 Local Plan in its current form omitted a suitable and deliverable opportunity to secure lasting and sustainable growth at the very edge of the Samlesbury Enterprise Zone. Accordingly, the Council advocated the site's inclusion as a priority and preferred location for growth within the next iteration of the Local Plan.

3.3.3 It is important to recognise that Parcel P14, as shown on page A1-41 of Appendix A1 to the Green Belt Assessment – reproduced below for ease of reference – covers a huge area. The parcel measures approximately 3.25 miles from west to east, and 2 miles from north to south. Such a vast 'parcel' (which we observe is not really a parcel of land at all) will inevitably contain a very wide range of sites and land of varying characteristics, and a more fine-grained assessment is clearly required in order to reach decisions regarding the release of Green Belt land.

**Figure 3.1 Parcel P14 as defined within the Central Lancashire Green Belt Assessment (2023)**

## Parcel P14



© Crown copyright and database rights, Ordnance Survey license number 09121572.



### 3.4 Grey Belt

3.4.1 Paragraph 142 of the December 2024 version of the NPPF confirms that the Government attaches great importance to Green Belts, and that *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.'* Accordingly, paragraph 143 states that Green Belt serves five purposes, which are to:

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

- 3.4.2 Paragraph 145 of the NPPF states: *'Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans'*. Paragraph 146, which is new and did not feature in the December 2023 version of the NPPF, advises as follows:

*'Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.'*

- 3.4.3 The content of paragraph 146 is an important clarification because, previously, the NPPF did not provide any guidance regarding the factors that could constitute exceptional circumstances justifying Green Belt release. The NPPF now confirms that exceptional circumstances includes a local authority's inability to meet its development requirements by other means.

- 3.4.4 Paragraph 147 then advises:

*'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.'*

- 3.4.5 Paragraph 148 of the NPPF then states that:

*'Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'*

- 3.4.6 'Grey belt' is a newly introduced concept and is defined within the NPPF Glossary as follows:

*'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating*

*to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'*

3.4.7 When applying Green Belt boundary changes, paragraph 149 of the NPPF advises that plans should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time; planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

3.4.8 Another new addition to the NPPF is the following text within paragraph 151:

*'Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.'*

3.4.9 Paragraph 156 reads as follows:

*'Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:*

*a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*

*b. necessary improvements to local or national infrastructure; and*

*c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.'*

3.4.10 The updated NPPF is therefore helpful in that it now defines some of the factors that are capable of constituting 'exceptional circumstances' which justify the release of Green Belt land. For the reasons that we outline elsewhere within our current representation – such as the clear failure of the current version of the draft Plan to meet development needs in full – we firmly believe that exceptional circumstances exist.

3.4.11 Furthermore, the Government updated the Green Belt section of the Planning Practice Guidance ('PPG') on 27 February 2025 which, amongst other things, provides refreshed guidance to assist local authorities with Green Belt reviews. The update contains various

clarifications regarding the interpretation and application of Green Belt policy. The guidance is quite lengthy, but several key parts of the updated guidance that we consider worth highlighting here are as follows:

- Rather than assessing a small number of large assessment areas as part of Green Belt assessments, local authorities are encouraged to assess smaller areas. That advice is particularly pertinent given our comments above regarding Parcel P14 from the Green Belt Assessment of 2023, which covers a huge area is effectively of no utility in evidencing which is the most sustainable land to release from the Green Belt. A much more fine-grained assessment is clearly required.
- In terms of how to assess the contribution that land makes to the Green Belt purposes, when making judgements as to whether land is grey belt, the PPG reaffirms that purposes a), b) and d) relate, respectively, to the sprawl of large built up areas, the merging of towns, and historic towns.
- Allied to the latter point above, the updated PPG confirms that villages are not encompassed by the terms 'large built up areas', 'towns' and 'historic towns'.

3.5 The subject land is not previously developed land but it makes a very limited contribution to the Green Belt purposes generally, and purposes a), b) and d) specifically. To briefly elaborate regarding the three specified Green Belt purposes:

- Green Belt purpose a): There is no potential for the unrestricted sprawl of any large built-up areas. The subject land is sandwiched between two strategic road links, namely the A59 to the north and the A677 to the south, as well as Samlesbury Enterprise Zone and Innovation Hub and the BAE Systems Samlesbury operations site to the west, and the village of Mellor Brook to the east.
- Green Belt purpose b): There is no potential for the release of the subject land to cause any towns to merge because of the strong, permanent boundaries and characteristics referred to above and also because Samlesbury Enterprise Zone and Innovation Hub together with the BAE Systems Samlesbury site is a successful economic cluster as opposed to a gap between towns.
- Green Belt purpose d): Mellor Brook is not a historic town and there is no potential to affect the setting and special character of any historic towns.

3.5.1 Furthermore, the subject land is not covered by any of the areas of assets listed within NPPF footnote 7.

3.5.2 The PPG also provides guidance regarding how the impact of a proposed development on the openness of the Green Belt should be assessed, but that relates to proposals for development rather than establishing whether there are exceptional circumstances to release land from the Green Belt via the plan making process.

3.5.3 The subject land therefore constitutes 'grey belt' as defined within the NPPF. As such, the land should be removed from the Green Belt and promoted for a sustainable pattern of development, whilst allowing a suitable alternative, permanent and defensible Green Belt boundary to be created.

### **3.6 Locational Advantages**

3.6.1 There are other locational advantages for new development at the subject land, as described below:

- Infrastructure and sustainable communities: the subject land is an accessible and sustainable location and directing employment and residential uses there would make the best use of existing infrastructure, facilities and services that are currently available in the vicinity.
- Sustainable travel: the proposed development would make efficient use of the existing transport infrastructure and there are obvious opportunities to deliver a scheme which puts active travel and sustainable modes of travel (cycling, walking and public transport) ahead of the private car.
- New homes: release of the land would enable the provision of a mix of housing types and sizes to create a healthy, vibrant, safe and sustainable community that meets the changing needs of Central Lancashire's population and supports a variety of family homes, with affordable housing delivery being a high priority.
- Economic Growth & Employment: the subject land is ideally placed to provide a range of employment and economic growth opportunities in a sustainable location, building on the infrastructure at and around the Enterprise Zone.

3.6.2 These core characteristics and benefits demonstrate a strong and justified need to support the subject land as a strategic location for planned growth.

## 4 Specific Policy Objections

### 4.1 Introduction

4.1.1 We object to the following sections and policies of the Plan, all of which fail the tests of soundness set out in paragraph 36 of the NPPF. Each of our objections listed in sections 4.2 to 4.7 below reflects:

- the site-specific justification which we demonstrated in Section 3 for the subject land being released from the Green Belt and allocated for strategic mixed employment and housing development; and
- the relevant national and local planning policies which support that justification, as we set out in Section 2.

### 4.2 Plan Period

4.2.1 Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption and that, where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. Based on our experience elsewhere, we consider that the Plan is unlikely to be formally adopted until 2027, such that the Plan period should be extended until at least 2042.

### 4.3 Spatial Vision, Strategic Objectives and Policy SS1 Development Patterns

4.3.1 We object to the Spatial Vision, Strategic Objectives and the spatial strategy described in Policy SS1 because they pay insufficient heed to the national political and planning imperative to stimulate and enable sustainable economic and housing growth. They are not sufficiently ambitious to deliver against that imperative, because they do not:

- a) demonstrate with evidence that the spatial strategy is deliverable over the Plan period, will meet the varied and significant full employment and housing needs of the area and will avoid an under-supply of land for new employment and homes. In these respects, the Plan conflicts with paragraphs 11 a), 11 b), 20-23, 36, 61, 62, 69 and 85-87 of the NPPF;
- b) acknowledge that, given the scale of those needs and the absence of sufficient available urban or previously developed land, exceptional circumstances exist whereby it is necessary to release Green Belt land, prioritising grey belt sites which conform with sustainable patterns of development, in accordance with paragraphs 145 to 149 of the NPPF; and
- c) adequately recognise the strategic importance, economic strengths, success in attracting investment and potential for further growth of the cyber corridor between Lancaster and Manchester (including the M6-A59 corridor and the Growth Axis linking Samlesbury, Blackburn town centre and the M65). In this context, the Plan also pays inadequate regard to the fundamentally important role within the cyber corridor played by the high value economic cluster comprising the Samlesbury Enterprise Zone and Innovation Hub and the adjoining BAE Systems site and the need to plan positively for the future consolidation and sustainable expansion of this cluster in the form of complementary employment and residential growth. In these respects, the Plan conflicts with paragraphs 85-87 of the NPPF, the adopted Blackburn Local Plan and the objectives of the emerging Lancashire Growth Plan.

#### **4.4 Policy SS2 Settlement Hierarchy**

- 4.4.1 The settlement hierarchy should incorporate flexibility to allow economic and associated residential growth outside existing settlement boundaries where it is demonstrably sustainable and in accordance with the development patterns identified by Policy SS1 (noting that we have objections to Policy SS1, as described above).
- 4.4.2 We consider that the subject land should be allocated for strategic mixed use employment and residential development and that, together with the village of Mellor Brook and the economic cluster comprising the Salmesbury Enterprise Zone and the BAE Systems site, these elements constitute a particular form of sustainable settlement which warrants special consideration within a revised hierarchy.

#### **4.5 Policies SS3-SS6 Strategic Site Allocations**

- 4.5.1 Policies SS3 to SS6 lack a sufficiently robust evidence base to demonstrate that the scale of the proposed housing and employment development is realistically deliverable over the Plan period, particularly where implementation is reliant on the provision of major and costly new infrastructure, which often results in delay and can prejudice viability. For example, the allocation at Pickerings Farm (Policy SS6) is contingent upon the construction of a Cross Borough Link Road.
- 4.5.2 For all of the reasons described through this representation, we also consider that the subject land should be a strategic, mixed-use allocation for employment and residential development within a revised Plan.

#### **4.6 Policy HS1 Scale of Housing and Distribution**

- 4.6.1 We object to this policy because, like the Plan's Vision, Objectives and Spatial Strategy, it pays insufficient heed to the national political and planning imperative to stimulate and enable sustainable economic and housing growth. Draft Policy HS1 is not ambitious enough to deliver against that imperative, because it does not:
- a) demonstrate with evidence that the spatial strategy is deliverable over the Plan period, will meet the varied and significant full housing needs of the area and will avoid an under-supply of land for new homes. In these respects, the Plan conflicts with paragraphs 11 a), 11 b), 20-23, 36, 61, 62 and 69 of the NPPF;
  - b) acknowledge that, given the scale of those housing needs and the absence of sufficient available urban or previously developed land, exceptional circumstances exist whereby it is necessary to release Green Belt land, prioritising grey belt sites which conform with sustainable patterns of development, in accordance with paragraphs 145 to 149 of the NPPF; and
  - c) adequately recognise the strategic importance, economic strengths, success in attracting investment and potential for further growth of the cyber corridor between Lancaster and Manchester (including the M6-A59 corridor and the Growth Axis linking Salmesbury, Blackburn Town Centre and the M65). In this context, Policy HS1 also pays inadequate regard to the fundamentally important role within the cyber corridor played by the high value economic cluster comprising the Salmesbury Enterprise Zone and Innovation Hub and the adjoining BAE Systems site and the need to plan positively for the future consolidation and sustainable expansion of this cluster in the form of complementary employment and residential growth. In these respects, the Plan conflicts with paragraphs 85-87 of the NPPF, the adopted Blackburn with Darwen Local Plan and the objectives of the Lancashire Growth Plan.

- 4.6.2 In addition, we have the following more specific objections to Policy HS1.
- 4.6.3 The draft policy only requires 23,652 dwellings to be provided between 2023 and 2041 over the whole Plan area. This requirement figure is based on an employment-led scenario used in the Housing Land Study Update of December 2024 but it is notable that the figures derived from this scenario were then effectively superseded by the revised standard method also published during the same month.
- 4.6.4 The housing requirement figure is also flawed in that it reflects a total jobs growth forecast of 16,660 jobs across the Plan area, as provided by Cambridge Econometrics. However, an alternative jobs growth figure produced by Oxford Economics is much more optimistic, forecasting 26,550 additional jobs. Furthermore, neither of these forecasts include jobs growth associated with specific projects in the Plan area, such as the proposed location of the National Cyber Force HQ within Samlesbury Enterprise Zone, yet the Draft Lancashire Growth Plan (page 19) indicates that 3,120 direct and indirect jobs could be created as result of this initiative.
- 4.6.5 Furthermore, the stated housing requirement figure of 23,652 dwellings represents less than 80 per cent of the area's housing need, which is 29,934 dwellings (using the revised standard method introduced in December 2024 and also taking account of the latest affordability ratios published in March 2025) over the Plan period – and if the Plan period is extended to 2042, as we consider it should be, the housing need is actually 31,597 dwellings, such that the Plan is only providing for 75 per cent of the objectively assessed need and therefore it fails to comply even with the transitional arrangements described in paragraph 234 of the NPPF.
- 4.6.6 The Plan's housing provision strategy is clearly a response to those transitional arrangements, yet there is no evidence base to justify it – this mechanism of seeking to provide for 80 per cent of need has simply been used for expediency in the hope that the Plan is found to comply with the deadline set by NPPF paragraph 234 for publication of a Regulation 19 Plan. Yet draft Policy HS1 conflicts with other parts of the NPPF, which confirm that the housing requirement figure set by the Plan should:
- meet local housing need in full and be considered as a minimum, as required by paragraphs 11 a), 11 b), 20-23, 36, 61, 62 and 69 of the NPPF. Indeed, we consider that there is actually justification for the housing requirement figure to exceed the identified housing need in Central Lancashire, as allowed for in paragraph 69 of the NPPF, because the Plan should positively reflect growth ambitions linked to economic development, as we describe in our objections to other parts of the Plan; and
  - in accordance with paragraph 63 of the NPPF, reflect the size, type and tenure of housing needed for different groups in the community, including affordable housing and various forms of specialist housing.
- 4.6.7 The Plan's evidence base does not adequately demonstrate that even the lower housing requirement figure of 23,652 dwellings can be delivered over the Plan period. We consider that undue reliance is placed on all the Plan's housing allocations being implemented and completions achieved in accordance with the housing trajectories within Appendix 3 to the Plan. In our experience, at least some of the allocated sites will not come forward as planned or will be delayed such that completions are lower than expected, resulting in a shortfall of housing supply. In order to avoid such a shortfall from arising, which would have harmful consequences both for meeting housing need and for economic growth, the Plan should allocate sufficient additional housing sites, where they conform with sustainable patterns of development, to provide greater choice, flexibility and competition in the housing market.

## **4.7 Policy EC1 Scale of Economic Growth**

- 4.7.1 We object to this policy because, like the Plan's Vision and Strategic Objectives and Policies SS1 and HS1, it pays insufficient heed to the national political and planning imperative to

stimulate and enable sustainable economic and housing growth. Paragraph 5.2 of the Plan recognises this over-arching imperative where it states:

*'The NPPF aims to build a strong, competitive economy, planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Supporting economic growth and better productivity are key national priorities, taking into account local business needs, strengths and wider opportunities and challenges. Sustainable economic growth should be encouraged with sites or criteria identified for local and inward investment to meet anticipated needs over the plan period. Locational requirements of different sectors should be recognised and support given to a prosperous rural economy.'*

4.7.2 However, draft Policy EC1 is not ambitious enough to deliver against that imperative, because it does not:

- a) demonstrate with evidence that the spatial strategy is deliverable over the Plan period, will meet the varied and significant full employment needs of the area and will avoid an under-supply of land for new employment. In these respects, the Plan conflicts with paragraphs 11 a), 11 b), 20-23, 36 and 85-87 of the NPPF;
- b) acknowledge that, given the scale of those employment needs and the absence of sufficient available urban or previously developed land, exceptional circumstances exist whereby it is necessary to release Green Belt land, prioritising grey belt sites which conform with sustainable patterns of development, in accordance with paragraphs 145 to 149 of the NPPF; and
- c) adequately recognise the strategic importance, economic strengths, success in attracting investment and potential for further growth of the cyber corridor between Lancaster and Manchester (including the M6-A59 corridor and the Growth Axis linking Samlesbury, Blackburn town centre and the M65). In this context, the Plan also pays inadequate regard to the fundamentally important role within the cyber corridor played by the high value economic cluster comprising the Samlesbury Enterprise Zone and Innovation Hub and the adjoining BAE Systems site and the need to plan positively for the future consolidation and sustainable expansion of this cluster in the form of complementary employment and residential growth. In these respects, the Plan conflicts with paragraphs 85-87 of the NPPF, the adopted Blackburn with Darwen Local Plan and the objectives of the Lancashire Growth Plan.

4.7.3 In addition, we have the following more specific objections to Policy EC1.

4.7.4 The draft policy identifies a need for 172.87 hectares of employment land during the Plan period, based on a total jobs growth forecast of 16,660 jobs across the Plan area, as provided by Cambridge Econometrics. However, an alternative jobs growth figure produced by Oxford Economics is much more optimistic, forecasting 26,550 additional jobs. Furthermore, neither of these forecasts include jobs growth associated with specific projects in the Plan area, such as the proposed location of the National Cyber Force HQ within Samlesbury Enterprise Zone. The Lancashire Growth Plan (page 19) indicates that 3,120 direct and indirect jobs could be created as result of this initiative.

4.7.5 It therefore follows that the Plan's provision for employment land will be insufficient to align with the objectives of the Lancashire Growth Plan and will not meet the full employment needs of the Plan area.

4.7.6 We also note that part 5 of the draft policy refers to the Samlesbury Enterprise Zone and includes the following text: *'Development likely to compromise its delivery or operation of the Enterprise Zone will not be supported.'* In respect of the subject land, in order to address any concern that its development would somehow prejudice the delivery or operation of the Enterprise Zone, we propose that a phasing or other similar policy mechanism could be

considered, so that the subject land would not be developed for employment purposes until such time as the comprehensive delivery of development within the Enterprise Zone had been confirmed or committed.

# **Appendix A      Development Statement, April 2022**



A Sustainable Urban Extension at Mellor  
Brook / Samlesbury

**DEVELOPMENT STATEMENT**  
**APRIL 2022**

**Cass Associates**

Studio 204B  
The Tea Factory  
82 Wood Street  
Liverpool  
L1 4DQ

Tel: 0151 707 0110  
E-mail: [all@cassassociates.co.uk](mailto:all@cassassociates.co.uk)

## Contents

- 1 Introduction
- 2 Urban Expansion at Mellor Brook / Samlesbury – Why Here?
- 3 The Context of the Site
- 4 Planning Context
- 5 Constraints and Opportunities
- 6 Access and Connectivity
- 7 Indicative Concept Masterplan

## 1. Introduction

This Development Statement explains why sustainable growth in the vicinity of the Samlesbury Enterprise Zone over the next 15 years is best secured on land between Mellor Brook and the Enterprise Zone (the site).

The assessment of the need for development that will be complementary to the Enterprise Zone is an ongoing process but the site is best placed if a need is identified. It is a more sustainable alternative to the proposals at Cuerdale Garden Village, further to the west on land bounded by the M6 and the A59, which has been promoted by Story Homes.

New development at the site can be integrated with existing and proposed development at the Enterprise Zone and with the built structure of Mellor Brook. Moreover, it presents a significant opportunity to introduce land uses and activities which will add value and strength to what currently exists at the Enterprise Zone and at Mellor Brook. They are neighbouring places which are only loosely tied together. A comprehensive approach to new development at the site is an opportunity to create a more significant mixed use location which ties disparate development together into a consolidated whole.

This is a viable choice which will be far more sustainable and accessible than Cuerdale Garden Village. It should be given due consideration as plan making in Central Lancashire is taken forward, particularly when decisions are being made as to reasonable alternative locations for the release of land from the Green Belt to meet identified development needs.

Overall, it is demonstrated through this Development Statement that:

- The site is the most sustainable location for the next stage of managed growth around the Samlesbury Enterprise Zone.
- It is a suitable urban extension because of its proximity to services and facilities and the connections that can be made to the existing built up area and the diverse range of nearby land uses.
- It is well contained by strong features in the local landscape.
- There are no technical, ownership or environmental constraints that would prevent development.
- The site could provide opportunities for mixed use development in combination with a solar array installation to help meet the carbon neutral ambitions of Blackburn with Darwen Council (the land owner).

## 2. The Urban Expansion at Mellor Brook / Samlesbury – Why Here?

The rationale for the sustainable urban extension is that it builds on the employment generating potential of the Samlesbury Enterprise Zone and the proposed National Cyber Force Campus. It is the opportunity for complementary employment development, housing, renewable energy installations and other uses that is closest to the Enterprise Zone on land that is well contained by existing development. It falls at a central location between Preston and Blackburn (Figure 1).

The new urban extension provides an opportunity for employment development and new housing at scale along with district centre uses. This is preferable to smaller, incremental developments. A critical mass of development will be achieved based on an intelligent approach to infrastructure delivery which will support a sustainable and lively community.

The strength of the new urban extension lies in:

- The way in which it will support and complement the growth ambitions in Central Lancashire which, to a significant extent, are focused on the job creating opportunities at the Samlesbury Enterprise Zone.
- The potential to meet the needs of households in this area of growth in a co-ordinated way and over the next 15 years.
- The creation of a place that incorporates the infrastructure to support the new and existing community at Mellor Brook and the expanding workforce at the Enterprise Zone.
- The potential contribution that can be made to addressing the climate emergency through a suitably located solar array installation.



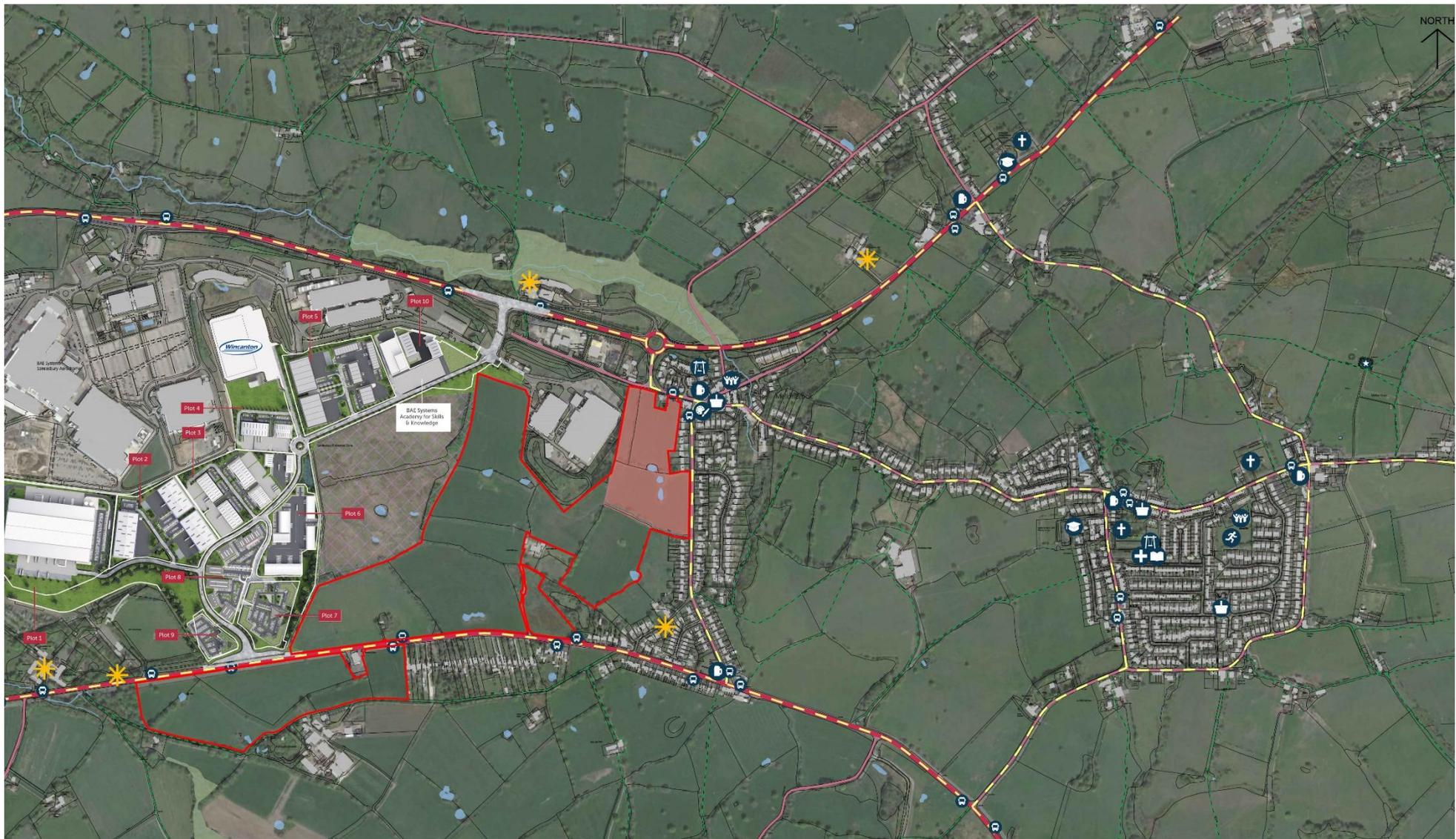
Figure 1 Strategic Context

### 3. The Context of the Site

The urban extension land falls between the eastern edge of the Samlesbury Enterprise Zone and the western edge of Mellor Brock. It is well contained by existing development (Figure 2).

The sense of containment is further augmented by its location in the reasonably narrow corridor which is defined by the A59 to the north and the A677 (Preston New Road) to the south. These are both key routes that run west to east through Central Lancashire and provide strategic links to the M6 and between Preston and Blackburn. The urban expansion is placed on land at a pivotal location along the routes that serve to connect major conurbations in the sub region.

In this context there is already a range of activities and land uses. The focus for employment and job creation is the Enterprise Zone which is soon to be substantially strengthened by the National Cyber Force Campus. Housing is found in Mellor Brook. In Mellor Brook there are also local services at a scale which is commensurate with the size of the settlement. These include a public house and shop clustered around the historic core of the village.



NORTH



Figure 2 Local Context

### LEGEND

|                    |                            |                          |                  |                     |  |
|--------------------|----------------------------|--------------------------|------------------|---------------------|--|
| Site Boundary      | Bus Stop                   | Biological Heritage Site | Place of Worship | Play Area           | Library                                      |
| Main Road Network  | Public Right Of Way (PROW) | Listed Buildings         | Shop             | Sports Facility     | Art Gallery                                  |
| Local Road Network | Watercourse                | Ancient Monument         | Public House     | Medical Centre      | Policy B2 Village Development Allocated Site |
| Bus Route          | Pond                       | School                   | Community Centre | Habitat Enhancement |  |

## 4. Planning Context

The current development plan in South Ribble will be replaced by the Central Lancashire Local Plan. This is at an early stage of preparation and cannot be given very much weight at present but it will be fundamental to establishing patterns of new development across Central Lancashire over the period up to 2036.

To date there has been consultation on an Issues and Options report. This is of relevance to the extent that it indicates the broad shape of future planning policy.

In the Issues and Options report one key consideration to be taken forward was to identify future development needs and growth potential and to establish the broad principles for the distribution and location of new development.

At this early stage of plan making the Central Lancashire authorities are reviewing how much land is needed for new homes, jobs and facilities. There is a considerable amount of evidence to be gathered and reviewed to inform the way in which the new Local Plan will guide growth, investment and development over the next 15 years.

The thorough assessment of need and infrastructure will then lead onto a review of how new development should be distributed in ways that secure the most sustainable patterns of development. This might include the release of land from the Green Belt. Any release of land from the Green Belt should be in the right place - based on a robust review of all land in the Green Belt and the way that land meets the objectives and purposes of including land in the Green Belt.

This Development Statement has been provided to inform the ongoing preparation of the new Central Lancashire Local Plan and shows that a sustainable urban extension at Mellor Brook / Samlesbury is a reasonable alternative location for new development that can take place in the plan period.

## 5. Constraints and Opportunities

There is a range of considerations that need to be taken into account when assessing the suitability of any site for new development (Figure 3).

From a policy perspective, the site is part in the Green Belt and part allocated for Village Development under Policy B2 of the South Ribble Local Plan. The Green Belt boundary will be subject to review as part of the preparation of the Central Lancashire Local Plan. This Development Statement will inform this review; it is particularly relevant to highlight that the land is well contained by existing development by virtue of its location between the Enterprise Zone and Mellor Brook.

There are no physical or environmental factors that will prevent development. It is in Flood Zone One and is not susceptible to flooding. Access can be gained from the existing road network. There are no man made or natural features of any significance. The land has not been previously developed and the risk of contamination or pollution is minimal.

The nearest site of nature conservation interest is on the far side of the A59. This is in the form of a Biological Heritage Site along Mellor Brook. It is separate from the site and any new development is not likely to impact on its integrity. Hunter Brook crosses the site and there are hedgerow trees and hedges but these can be incorporated into any new development as part of a network of green / wildlife corridors.

There are listed buildings in the vicinity of the site, the most notable being Samlesbury Hall. However, in all instances there is development or woodland

between these heritage assets and the site. There will be no harmful impact on the setting of listed buildings should the site be developed.

There is excellent proximity to the strategic road network and an opportunity to connect new development directly onto strategic roads (A59 and A677) and then onto the M6. In addition, the development of the site will release land for public access, allowing the creation of a network of new pedestrian and cycle routes that link Preston New Road and the Enterprise Zone to the core of Mellor Brook. This network can be embedded in greenspace corridors which will benefit new residents and the existing community.

There is also the opportunity to access and strengthen local facilities and services in order to establish community infrastructure that makes this area more resilient and more sustainable. The proximity to bus routes, local shops and the significant employment opportunities at the Enterprise Zone are all examples of how new development will benefit from what now exists but there is also the prospect of the new development itself including complementary infrastructure such as more local shops, a community building and, if there is a need, a primary school.

Due to the scale of the land that is available, low levels of woodland cover and the topography of the site there is also an opportunity to incorporate a solar array installation to complement any built development at the site.

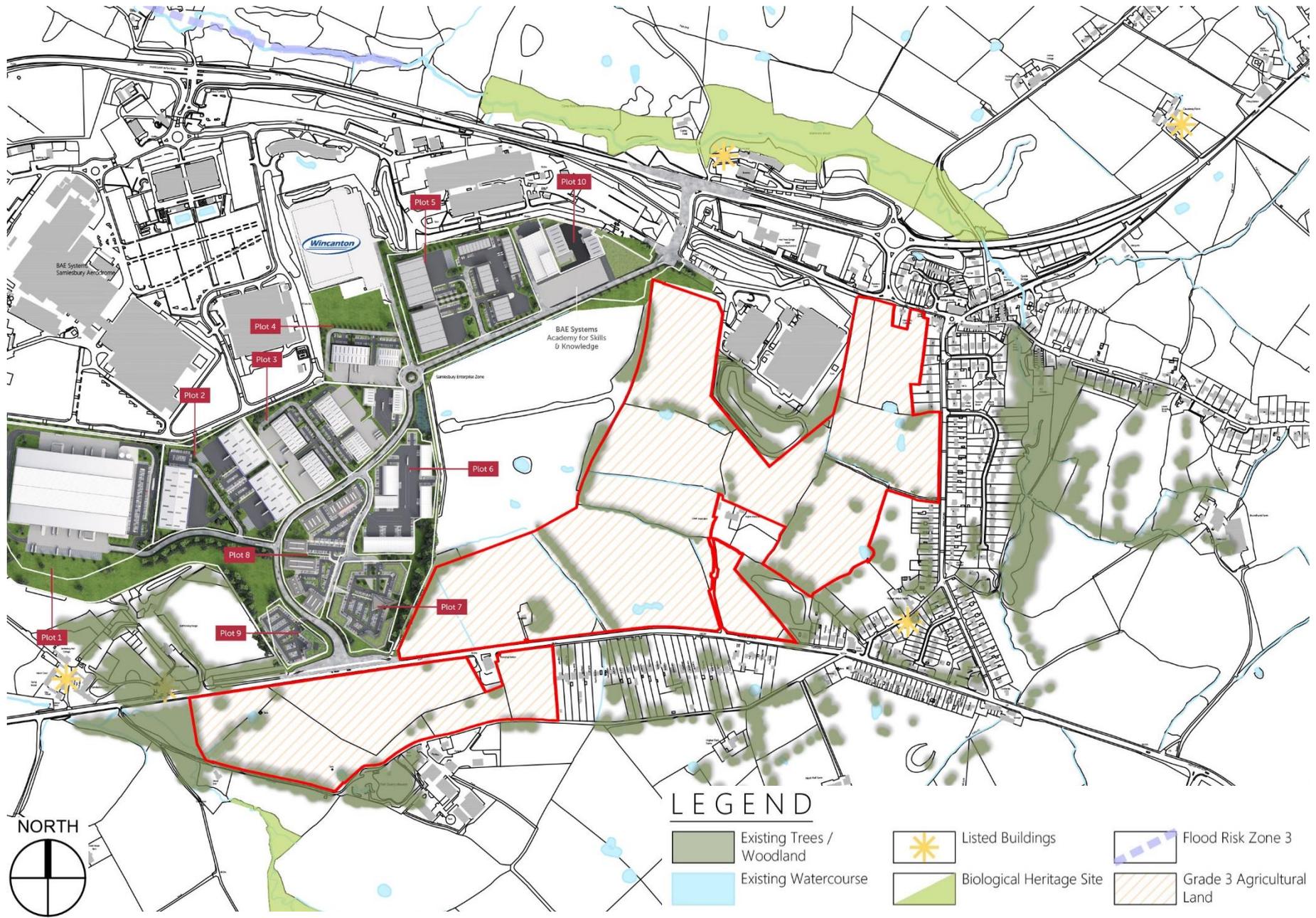


Figure 3 Constraints

## 6. Access and Connectivity

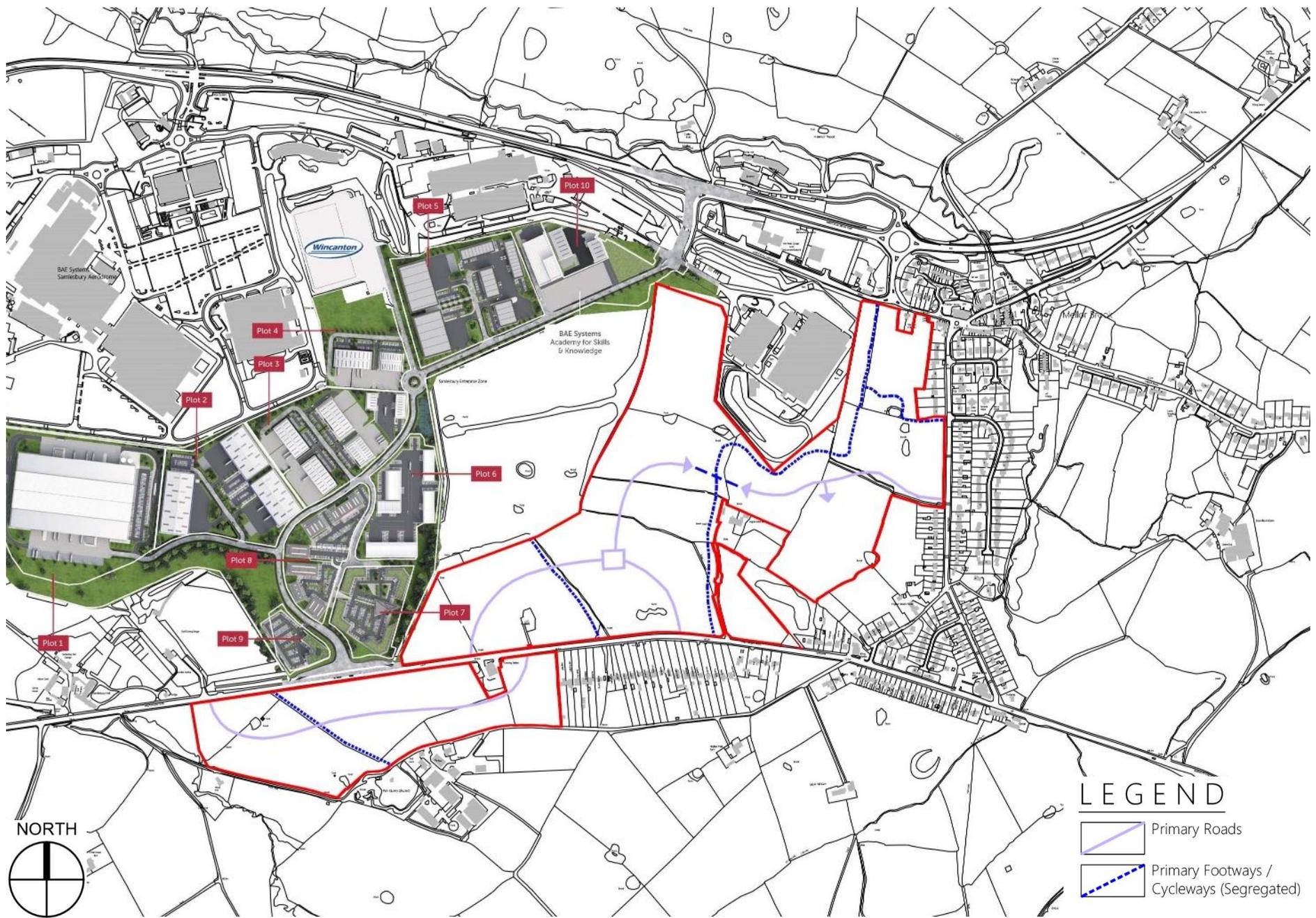
The location of the urban extension alongside two strategic road links provides the opportunity to connect any new development to key routes running through this part of Central Lancashire. In turn, this creates the opportunity to link new development to the conurbations of Preston and Blackburn (Figure 4) along a major public transport corridor.

The key roads (A59 and A677) are high frequency public transport corridors. Placing new development along these corridors resonates with a strategic approach to the planning of new urban extensions astride bus and rail routes.

Alongside the connections to higher order places in the sub region, there is also the potential to create a walkable neighbourhood with viable catchments for local schools, employment and local facilities as well as public transport.

The walkable neighbourhood can be established through the urban extension approach. In this case new housing and employment land would fall in a central location between the Enterprise Zone and Mellor Brook. High quality pedestrian and cycle routes through the new housing will form key linkages between these different but separated areas. Links can be formed between Mellor Brook and the Enterprise Zone through the urban extension but also between Preston New Road and the existing core of Mellor Brook. In short, the new urban extension will greatly improve connections between different land uses and activities and lead to a fully sustainable and walkable neighbourhood.

If local centre uses such as shops, a community building or, possibly, a primary school are incorporated then the concept of the walkable neighbourhood is further enhanced as it brings every day facilities and services within easy walking distance of the new housing and new employment land, the existing community of Mellor Brook and those that work at the Enterprise Zone.



### LEGEND

-  Primary Roads
-  Primary Footways / Cycleways (Segregated)

Figure 4 Movement Framework

## 7. Indicative Concept Masterplan

### Masterplan Influences

The indicative concept masterplan has been conceived so that it responds in a balanced way to the particular characteristics of the site and its setting. It has been influenced by the following key considerations.

#### Integration with its surroundings:

The movement routes through the site for pedestrians and cyclists need to link up pockets of development along Preston New Road, in Mellor Brook and at the Enterprise Zone. In this way the urban extension will be integrated with the developments that surrounds it.

#### Connectivity:

The movement of pedestrians and cyclists to and from the site and the connections with the existing road infrastructure will have a strong bearing on the form of the new development.

#### Urban form and building design:

The structure of new development, the orientation of buildings, the movement framework and green infrastructure corridors need to combine to create a legible and inspiring development that resonates with its surroundings.

### Masterplan detail:

The masterplan responds to the particular influences which have been identified. It shows new housing, employment land and complementary land uses set in the strong framework provided by green corridors traversing the site. These corridors incorporate hedgerows, trees and the water course of Hunter Brook.

In broad terms the distribution of these key land uses (Figure 5) in the masterplan will amount to the following indicative capacity:

| Land Use                                 | Gross Area (Ha) | Illustrative Capacity                               |
|--|-----------------|---|
| Housing (H1 - H6)                        | 13.8            | 420 units*  |
| Employment (E1 - E5)                     | 14              | 56,000 m <sup>2</sup>                               |
| Local Centre / Community Education (LC1) | 2.2             | Local shops, Primary school, Community hub building |

\* Excluding any housing on the allocated B2 Village Development site

The masterplan flows from the key land uses and is shown in illustrative form in Figure 6. With specific regard to the climate emergency agenda and to add to sustainability credentials there is an opportunity to include a large-scale solar array as part of any development, potentially on land identified on the illustrative masterplan as employment. A solar array installation would reduce the illustrative development capacity shown in the table above.

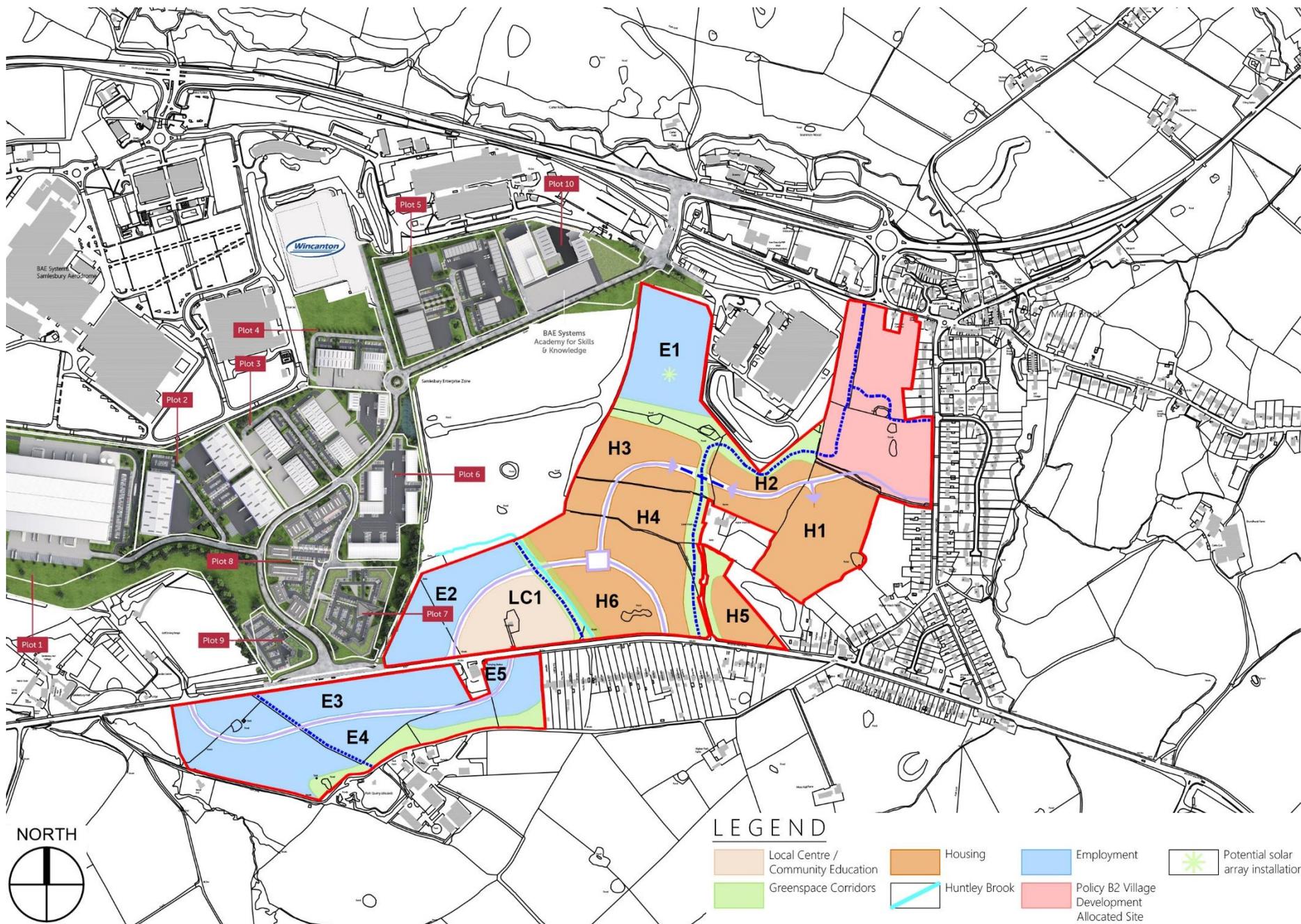


Figure 5 Land Uses

Primary vehicular access is taken from Preston New Road. The form and number of junctions onto this route will be subject to further assessment as the masterplan continues to be developed. A secondary access can be formed onto Branch Road. This has the potential to serve pockets of the new housing and any development brought forward on the land that is already allocated for development in the South Ribble Local Plan (Policy B2 Village Development). The access from Branch Road will not be made available for vehicles moving towards the larger part of the urban expansion area for vehicles. In other words, there will be no continuous route for vehicles between Preston New Road and Branch Road.

One area of the masterplan designated for employment development can be served by the primary access to the Enterprise Zone that runs between signal controlled junctions on the A59 and on the A677.

Equal attention has been given to pedestrians and cyclists. Separated routes for active travel flow through the corridors of greenspace to link up the historic core of Mellor Brook to Preston New Road and, beyond, to the Enterprise Zone. The overall ambition is to put in place a walkable neighbourhood whereby different parts of new and existing development are connected in a safe and coherent way.

There is a significant opportunity to provide a range of housing as part of the urban expansion. The housing will, in part, meet identified local needs but it will have a broader role in meeting strategic requirements for homes generated by the growth of job opportunities. It represents the optimal location for housing in this part of Central Lancashire over the next 15 years.

There are also significant opportunities to improve key environmental aspects of the site and to open it up to greater public access. For instance, biodiversity value

will be enhanced by the creation of improved habitat along the length of Hunter Brook and through the creation of an appropriately managed network of green corridors through which public paths are inter-weaved. A solar array installation could also be incorporated on parts of the site to contribute to carbon reduction and serve as a buffer between employment and residential uses.

This site is well contained by existing features in the landscape including built development and main road infrastructure. This is the best and the most sustainable option for the next stage of growth in this part of Central Lancashire.

It is a sustainable location for new housing and for new employment land. The site is already accessible to some everyday services and facilities. The sustainability score of the site can be increased by the inclusion of local or district centre uses such as local shops, a primary school or community buildings. The urban extension proposed will assist in making Mellor Brook a stronger, more vibrant and more resilient community.

The site is available and in the control of a public authorities (Figure 7). Housing and employment land is achievable and deliverable. The delivery of development is not constrained. There are no known technical, ownership or environmental factors that impede new development. This Development Statement demonstrates that the site is a suitable and sustainable location for a new development allocation. It would make a significant contribution to meeting development needs in Central Lancashire over the next 15 years. It has been shown that there are no impediments to the delivery of development.

There are compelling planning arguments in favour of identifying the site as the location for sustainable urban expansion in the right place and at the right time.

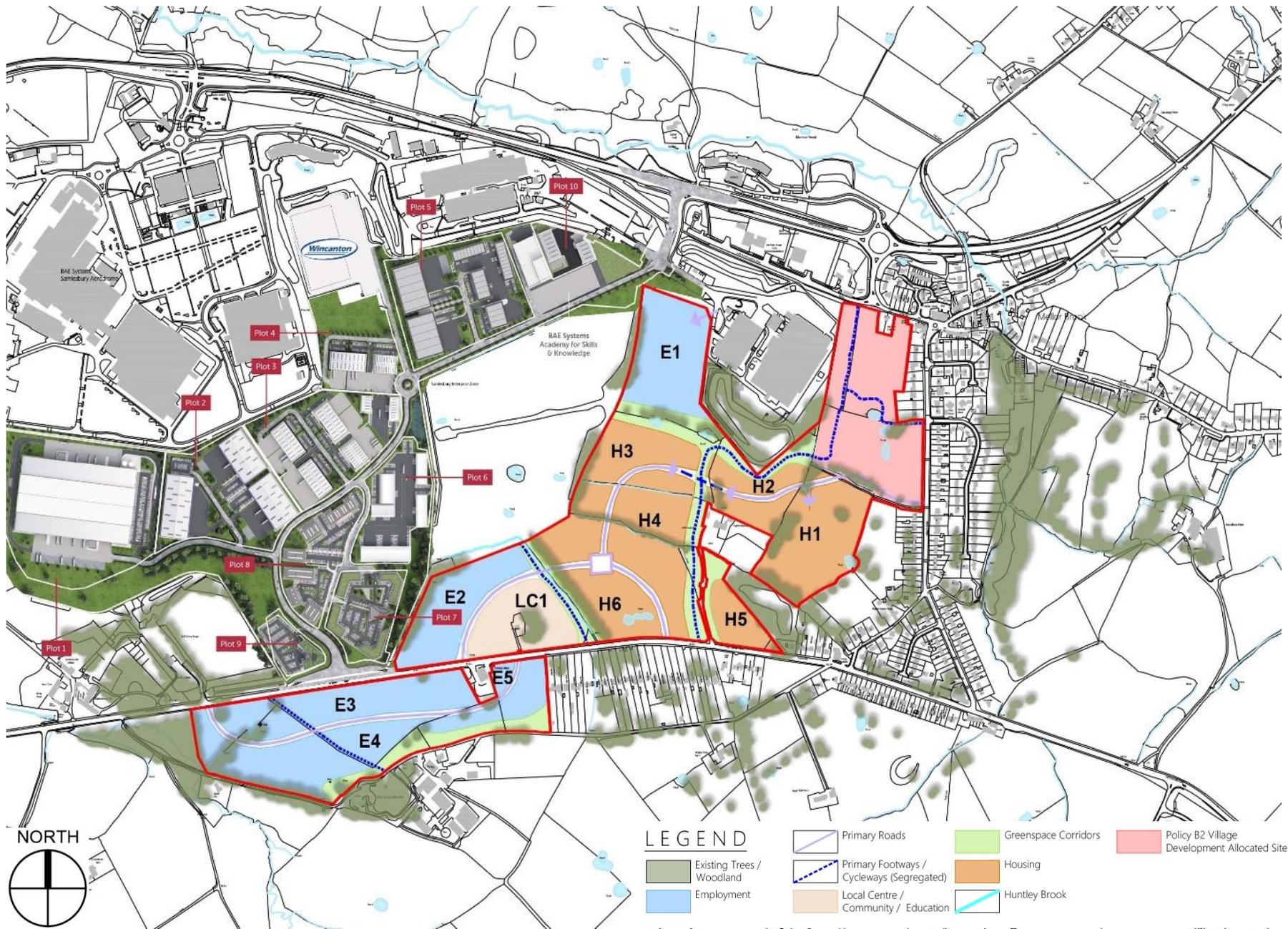


Figure 6 Illustrative Masterplan

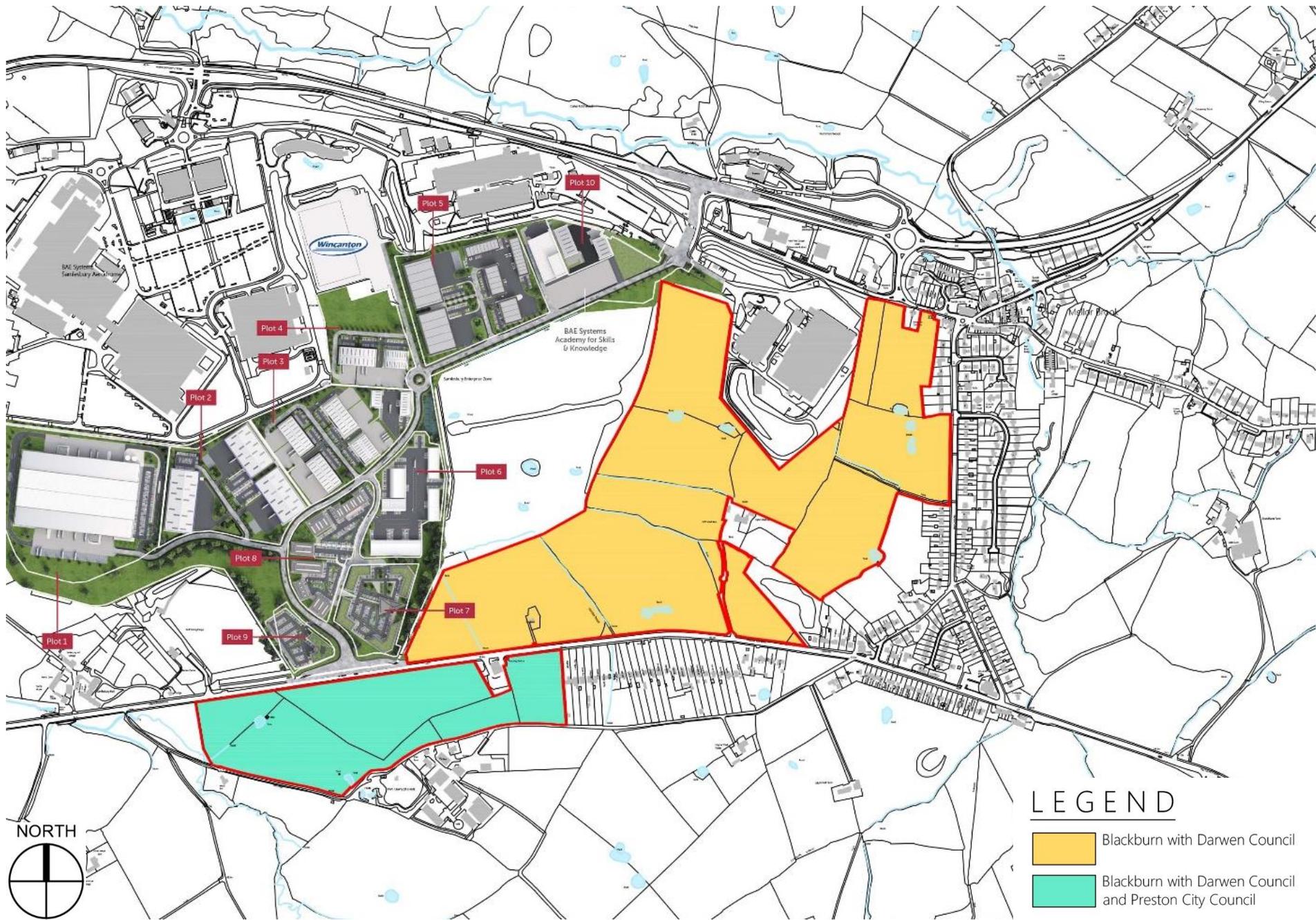


Figure 7 Land Ownership

## **Appendix B      Blackburn with Darwen Borough Council Submissions to the Central Lancashire Local Plan Regulation 18 Consultation, February 2023**

## Central Lancashire Local Plan Regulation 18 Part One: Preferred Options Consultation

To:

Central Lancashire Local Plan Team  
Civic Offices  
Union Street  
Chorley  
PR7 1AL

Email: [CentralLancashirePlan@chorley.gov.uk](mailto:CentralLancashirePlan@chorley.gov.uk)

These representations are made by Blackburn with Darwen Council in its role as the owner of significant areas of land next to the Samlesbury Enterprise Zone strategic location.

In the Plan period to 2038 the focus is on growth at existing Strategic Locations. The overall Spatial Approach (Policy Direction 2) highlights that there is a need to “consider identifying a strategic area for growth linked to the Enterprise Zone and National Cyber Force at Samlesbury”. In turn, there is an ambition to “further consider the role of Safeguarded Land (in South Ribble) and the Samlesbury / Cuerdale Growth Option.”

The Growth Option is orientated around the A59 Corridor leading from Junction 31 of the M6 to the Enterprise Zone and the National Cyber Force at Samlesbury. The potential for this corridor is seen as a leading opportunity for economic growth and new associated communities. Within the Growth Option area is the tentative Cuerdale Garden Village.

The opportunities in the Growth Option could contribute to longer term growth (beyond the Plan period) but they can also come forward sooner if justified and needed.

These growth opportunities are significant for the whole sub region but are also significant for South Ribble. There is the potential to meet the housing needs of South Ribble for the period of the emerging plan at this location should it not be possible to deliver housing at Pickering’s Farm where new development is contingent on the construction of the Cross Borough Link Road.

Blackburn with Darwen Council supports the aim of economic growth and associated growth around the Samlesbury Enterprise Zone but it believes that the Preferred Options Local Plan ignores the more sustainable release of land adjacent to the Enterprise Zone. For the reasons set out in these representations, there is an approach to economic and community growth which is more directly related to the Enterprise Zone and the National Cyber Force than the proposed A59 Growth Corridor (including Cuerdale Garden Village).

### **The More Sustainable Option for Growth Around the Samlesbury Enterprise Zone.**

There is available land alongside the Samlesbury Enterprise Zone where new development could directly and demonstrably complement the existing and prospective businesses, including the National Cyber Force, and be related to established infrastructure, facilities and services. This land is at Lower Intack which is bounded by Mellor Brook to the east, Samlesbury Enterprise Zone to the north and the A667 (Preston New Road) to the south and at the opposing side of Preston New Road.

The land around Lower Intack is best placed to meet a longer term need for economic development and associated communities. New development around Lower Intack can be integrated with existing and proposed development at the Enterprise Zone and with the settled built structure of Mellor Brook.

Moreover, it presents a significant opportunity to introduce land uses and activities which will add value and strength to what currently exists at the Enterprise Zone and at Mellor Brook. They are neighbouring places which are only loosely tied together at present. A comprehensive approach to new development around Lower Intack is an opportunity to create a more significant mixed use location which ties existing disparate development together into a consolidated whole.

This is a viable choice which will be far more sustainable and accessible than other locations in the vicinity of the A59 Corridor, including the Cuerdale Garden Village. It should be given due consideration as plan making in Central Lancashire is taken forward to the Part Two Preferred Options stage.

### **The Locational Advantages of the Land at Lower Intack.**

In the context of the Local Plan it is important to examine the evidence that supports plan preparation as far as it is relevant to the selection of the most sustainable options for economic and community growth around the Samlesbury Enterprise Zone.

A useful starting point is the Green Belt Study as land in South Ribble that is near the Enterprise Zone is designated as Green Belt.

The land at Lower Intack to the immediate east and south of the Enterprise Zone falls in Green Belt Parcel P14. The harm to the purpose of safeguarding the countryside from encroachment is the most important consideration for Parcel P14. This has a bearing on decisions for the release of land for development.

The Enterprise Zone and Mellor Brook are inset developments in the Green Belt. The Green Belt Study notes that the land to the south east of the Enterprise Zone (land at Lower Intack) has a “weak distinction from the urban area”. There is no boundary feature that creates a marked distinction from the development at the Enterprise Zone and the A677.

In relation to Parcel P14, the Green Belt Study concludes that “no land within the area contained by the Enterprise Zone, Mellor Brook and the A677 has strong distinction from urbanising development.” This is the land at Lower Intack. By extension of the argument the harm (in terms of encroachment on the countryside) arising from the release of this land from the Green Belt is lower.

The same can't be said for the Growth Option land identified in the Local Plan (including Cuerdale Garden Village). This land falls in P14 as well but also in Green Belt Parcels P61 and P12. The Green Belt Study reaches the conclusion that any development that is physically and visually well removed from the inset Enterprise Zone and Mellor Brook would constitute a significant encroachment on the countryside. In short, development of the Growth Option land identified in the Local Plan would be harmful to the Green Belt purpose of safeguarding land from encroachment.

There are other locational advantages for new development on the land around Lower Intack:

*Infrastructure and sustainable communities* . It would be development at an accessible and sustainable location which would make the best use of existing infrastructure, facilities and services that are currently available in the vicinity.

*Sustainable travel*. New development around Lower Intack would make efficient use of the existing transport infrastructure and provide opportunities to deliver a design which puts active travel and sustainable modes of travel (cycling, walking and public transport) ahead of the private car.

*Housing.* It would provide a mix of housing types and sizes to create a healthy, vibrant, safe and sustainable community that meets the changing housing needs of Central Lancashire's population, and supports a range and variety of tenures alongside a range of family homes, with affordable housing delivery being a high priority.

*Economic Growth & Employment.* The release of this land from the Green Belt would provide a range of employment and economic growth opportunities in a sustainable location, building on the infrastructure at and around the Enterprise Zone.

These core characteristics and benefits, when considered alongside the outcome of the Green Belt Study, point to a strong and justified need to support land around Lower Intack as a strategic location for growth, in preference to the far less sustainable and far more damaging locations in the Samlesbury / Cuerdale Growth Option set out in the draft Plan.

### **A Framework for Development at Lower Intack**

A Development Statement has already been submitted by Blackburn with Darwen Council to the Central Lancashire plan making team to explain why sustainable growth in the vicinity of the Samlesbury Enterprise Zone is best secured on land between Mellor Brook and the Enterprise Zone).

The Development Statement demonstrates that:

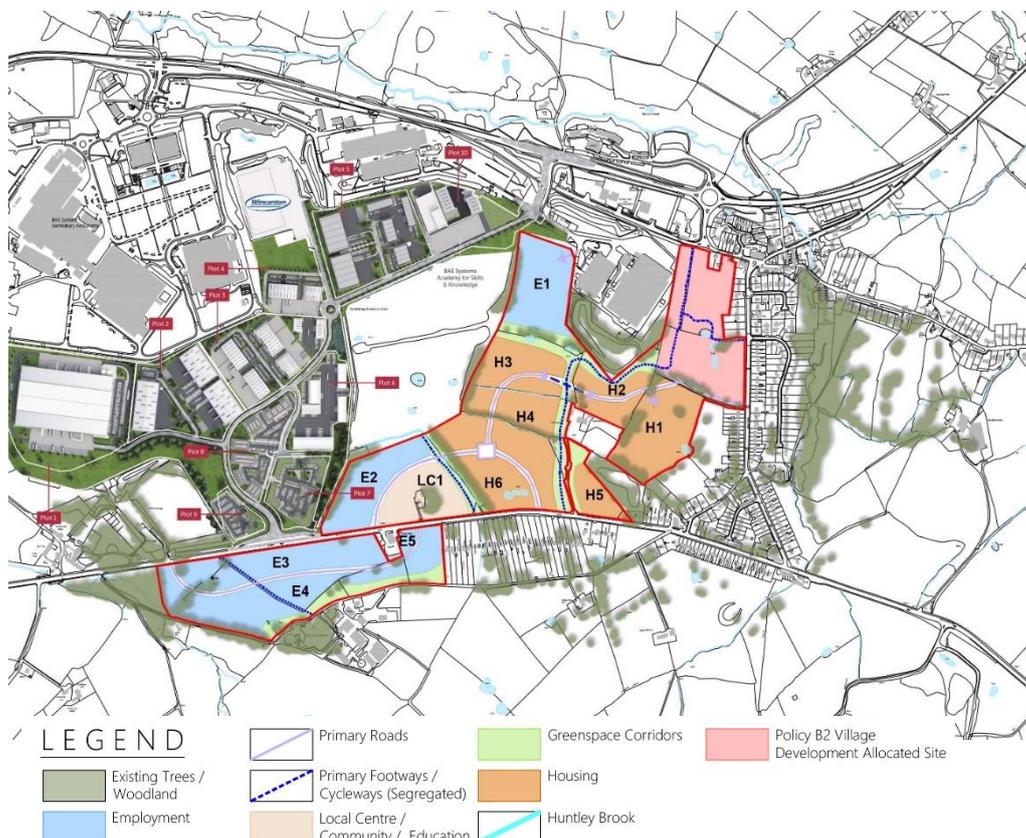
- The site around Lower Intack is the most sustainable location for the next stage of managed growth around the Samlesbury Enterprise Zone.
- It is a suitable location for an urban extension because of its proximity to services and facilities and the connections that can be made to the existing built up area and the diverse range of nearby land uses.
- It is well contained by strong features in the local landscape.
- There are no technical, ownership or environmental constraints that would prevent development.
- The site could provide opportunities for mixed use development in combination with a solar array installation to help meet the carbon neutral ambitions of Blackburn with Darwen Council (the land owner).

The rationale for development next to the Enterprise Zone is that it builds on the employment generating potential of the Samlesbury Enterprise Zone and the proposed National Cyber Force Campus. It is the opportunity that falls between Preston and Blackburn as is shown by the plan below. It is at a critical location between the key A59 Corridor and A677 (Preston New Road) Corridor.



The land around Lower Intack provides an opportunity for employment development and new housing at scale along with district centre uses. This is preferable to smaller, incremental developments. A critical mass of development will be achieved based on an intelligent approach to infrastructure delivery which will support a sustainable and lively community.

As part of the process of preparing the Development Statement, constraints and opportunities have been assessed and a full understanding of the context of the land has been gained. The survey and analysis has led on to an indicative plan for growth on the land to the east and south of the Enterprise Zone. The plan is reproduced below.



The plan responds to the particular influences which have been identified. It shows new housing, employment land and complementary land uses set in the strong framework provided by green corridors traversing the site. These corridors incorporate hedgerows, trees and the water course of Hunter Brook.

In broad terms the distribution of these key land uses will amount to the following indicative capacity:

| Land Use                                 | Gross Area (Ha) | Illustrative Capacity                               |
|--|-----------------|---|
| Housing (H1 - H6)                        | 13.8            | 420 units*  |
| Employment (E1 - E5)                     | 14              | 56,000 m <sup>2</sup>                               |
| Local Centre / Community Education (LC1) | 2.2             | Local shops, Primary school, Community hub building |

\* Excluding any housing on the allocated B2 Village Development site

With specific regard to the climate emergency agenda and to add to sustainability credentials there is an opportunity to include a large-scale solar array as part of any development, potentially on land identified on the illustrative masterplan as employment. A solar array installation would reduce the illustrative development capacity shown in the table above.

### Land Ownership and Delivery

The site is available and in the control of public authorities (Blackburn with Darwen Council and Preston City Council).

Housing and employment land is achievable and deliverable. The delivery of development is not constrained. There are no known technical, ownership or environmental factors that impede new development.

### Concluding Comments

Blackburn with Darwen Council strongly believes that the Local Plan in its current form omits a suitable and deliverable opportunity to secure lasting and sustainable growth at the very edge of the Samlesbury Enterprise Zone. This opportunity should be included in the Part 2 Regulation 18 Local Plan.

The land at and around Lower Intack should be a priority and preferred location for growth. It has the potential to be the centrepiece of a strategy that fulfils the ambitions of the Samlesbury / Cuerdale Growth Option.

Policy Direction 2 : Spatial Approach notes that there would be an exception to minimising the harm to the Green Belt where there is justification in South Ribble for a new settlement (at Cuerdale). However, the Green Belt Study shows that the harm to the Green Belt arising from the new settlement, in terms of encroachment on the countryside, will be considerable. The release of land from the Green Belt around Lower Intack would be far less harmful to Green Belt purposes. For this reason alone its status in the Local Plan should be elevated above the tentative new settlement.

Long term large scale development options are addressed in Policy Direction 5. These options need to deliver growth in a sustainable way. These representations have set out the sustainability credentials

that would be inherent in any development around Lower Intack. In short, and in accord with the requirements of Policy Direction 5, new development around Lower Intack would be of a sustainable scale, would be infrastructure-led, would be high quality and contain a mix of uses, would be linked to key public transport corridors and would embrace green and blue infrastructure in a positive way.

The option around Lower Intack merits further and deeper consideration in the context of the next iteration of the Central Lancashire Local Plan.

# **Central Lancashire Local Plan**

## **Regulation 18 Part One : Preferred Options Consultation**

To:

Central Lancashire Local Plan Team  
Civic Offices  
Union Street  
Chorley  
PR7 1AL

Email: [CentralLancashirePlan@chorley.gov.uk](mailto:CentralLancashirePlan@chorley.gov.uk)

### **Land at Myerscough Smithy Road and Branch Road, Mellor Brook**

These representations are made by Blackburn with Darwen Council (BwDC) who are the owners of the subject land. It is land that is allocated for Village Development (Policy B2) in the adopted South Ribble Local Plan.

BwDC is making these representations as the draft Central Lancashire Local Plan does not make reference to this site in particular or Village Development in general.

There are compelling planning arguments to demonstrate why this Village Development site should be clearly shown in the next iteration of the Local Plan (Regulation 18 Part Two).

#### **The Site**

The subject land (the site) extends to around 5.57 ha in area. It comprises a linked series of fields contained by hedgerows and hedgerow trees. There are field ponds at a central position on the site but otherwise the site is used for pasture.

The site is at the edge of the village of Mellor Brook with the core of the settlement and housing to the east and employment premises to the west, including the Samlesbury Aerospace Enterprise Zone.

#### **The Spatial Strategy of the Draft Central Lancashire Local Plan**

The Spatial Strategy of the draft Local Plan is based on an approach that seeks to maintain the existing urban structure of Central Lancashire as a connected grouping of towns and villages along key communication routes.

In the settlement hierarchy (Table1) Mellor Brook is identified as one of the smaller rural villages and hamlets. It is a Tier 5 settlement District Centre where a commensurate level of growth and investment is suitable to help meet housing and employment needs.

#### **The South Ribble Local Plan and Supplementary Planning Guidance**

The South Ribble Local Plan makes provision for new development on the periphery of certain villages, including Mellor Brook. Policy B2 (Village Development) allows the release of land during the Plan period for development (including local affordable housing, health care, community facilities or employment) provided that it cannot be accommodated within the existing built up area of the village or the allocated site is preferable for the use proposed.

The site is allocated for village development (Policy B2).

When the South Ribble Local Plan was being examined the Local Plan Inspector gave support to the principle and rationale for the allocation of sites at four locations for Village Development, including at Mellor Brook. There was one Modification proposed by the Local Plan Inspector:

“A modification (MM33) is proposed to policy B2 to remove the restriction on market housing in line with the advice in the Government’s online practice guide and to ensure that the plan is positively prepared.” (Report on the Examination into the Site Allocations and Development Management Policies Development Plan Document for South Ribble, June 2015 -paragraph 83).

Subsequently, any policy restriction on the inclusion of market housing on B2 Village Development sites was removed.

In order to give clarity and to explain the purpose of Policy B2 a Supplementary Planning Document (SPD) has also been adopted by the Council.

This SPD explains that the purpose of Policy B2 is to allow for the development needs of villages which are tightly constrained by the Green Belt.

The policy requires that any application for development on Policy B2 sites is accompanied by evidence of the local need for the development that is proposed. The SPD provides guidance on the range of information that will be needed to demonstrate that there is a local need.

The SPD also recognises that a significant issue in many rural settlements is the availability of a range of house types by size and tenure. In order to meet the needs of a wider range of households, housing on Policy B2 sites could include:

- Houses for first time buyers who live in a village but are not able to afford to buy a property there.
- Accommodation for older people who are looking to downsize
- Homes for families who need a larger property in the settlement
- Affordable housing of different types and tenures

The SPD states that reference should be made to a Local Housing Needs Survey or other evidence to support any development of either affordable housing or market housing. Mixed developments are permissible where market housing provides support for the delivery of affordable housing.

### **Local Needs and the Pre-Application Submission**

Blackburn with Darwen Council has been active in exploring the form and scale of development which is appropriate for the B2 site in Mellor Brook.

It has carried out a considerable amount of investigation, survey and masterplanning work. This work was used to support a formal pre-application enquiry to South Ribble Borough Council.

The range of information submitted in support of the pre application enquiry included:

- An overarching Planning Statement
- A Housing Need Study
- A masterplan framework
- Traffic and transportation
- Flood risk and drainage
- Ecology
- Noise assessment

The Housing Needs Study provides the evidence to support the proposed mix and scale of housing illustrated on the masterplan framework. It identifies a need for both affordable and market housing.

The Housing Needs Study responds to Policy B2 of the South Ribble Local Plan and the SPD (B2 – Village Development) by demonstrating the need for affordable and market housing.

The study examines the need for affordable and market housing in the three parishes of Samlesbury (in South Ribble) Balderstone and Mellor (in Ribble Valley). It draws on both secondary and primary data sources including from a survey of local households.

In relation to affordable housing need, the assessment shows that there is a need for 15 social / affordable rented dwellings per annum across the study area (a total of 76 over a five-year period) and a further 26 dwellings over this period for affordable home ownership. In combination, the affordable rental and low cost home ownership need is a total of 102 affordable homes over the next five years.

The Housing Needs Study also examines the broader need for housing in the study area. Taking into account newly forming households, and those seeking to move to another home, the study identifies a need for 308 households. If the affordable housing need of 102 dwellings over the next five years is removed from this then the study identifies a requirement for market accommodation of 206 dwellings over the next five years.

The masterplan framework illustrates how a range of accommodation types and tenures can be arranged to meet some of the identified need but not all of it. The framework shows that the allocated B2 site can accommodate a mix of market housing, affordable housing (35% of the total number of houses) and specialist accommodation for the elderly. This range is justified in full by the conclusions of the Housing Needs Study.

The pre application response ( April, 2022) from South Ribble Council was positive and recognised that the outcome of the Housing Needs Study has been reflected in the mix and scale of new development proposed for the site. In particular, it concludes that:

“The B2 Village Needs SPD requires that any developer should undertake a Housing Needs Survey if the Councils one is more than five years old, and that both affordable and market housing should be provided in line with that settlement’s needs. In the case of market housing, evidence of the lack of housing in the area to comply with the survey should also be included to support the proposals. This assessment has been provided and the design proposed appears to have taken into account its findings.”

### **Concluding Comments**

The Central Lancashire Local Plan has omitted to make reference to the Village Development allocation at Mellor Brook.

The draft Proposals Map shows the site (B2 Village Development site) as white land between the historic core of the village (in the District of Ribble Valley) and the Samlesbury Enterprise Zone.

The current allocation for Village Development in the South Ribble Local Plan and the work that has been carried out since the site was allocated to establish local housing need fully justify the inclusion of the site in the draft Central Lancashire Local Plan as a local development opportunity.

In the draft Central Lancashire Local Plan Mellor Brook is a smaller Tier 5 rural village (Table 1 Settlement Hierarchy) where some level of growth and investment will be directed over the Plan period.

The site is the only location where growth and investment in Mellor Brook can take place without changing the Green Belt boundary, which otherwise tightly encloses the village.

At Policy Direction 2 there is an ambition to minimise alterations to the Green Belt boundary. New development at the site can be accommodated without changing the settlement boundary of Mellor Brook (as defined by the Proposals Map for the South Ribble Local Plan) and without requiring an alteration to the Green Belt boundary. This is shown on the plan below ( an extract from the Proposals Map for the South Ribble Local Plan) where the site is highlighted in a yellow hatched line.

