Critique of the Planned Provision of Employment Land in the Draft Central Lancashire Local Plan

Cuerdale Garden Village

April 2025

Turley

Contents

Client
Story Homes

Our reference
STOM3025

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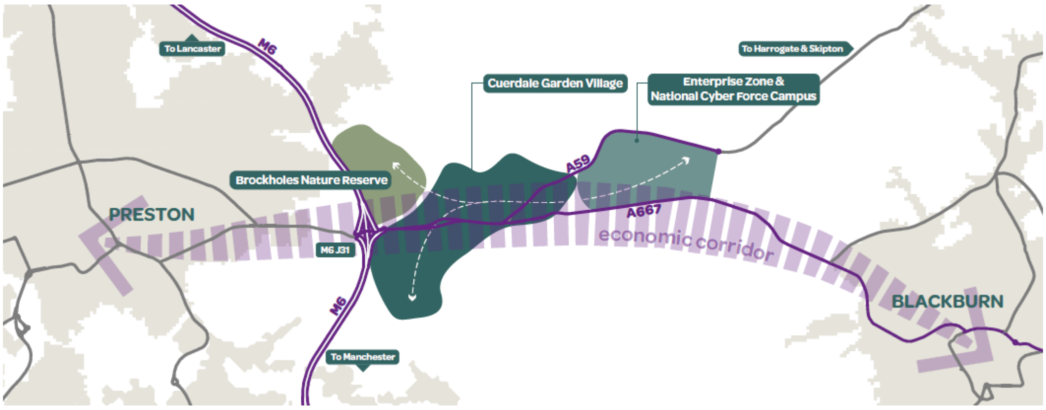
1. Introduction

1.1 This report has been commissioned by Story Homes to support representations to the emerging Central Lancashire Local Plan, concerning its proposals for Cuerdale Garden Village.

Cuerdale Garden Village

1.2 Cuerdale Garden Village is located within the A59 Growth Corridor, adjacent to Junction 31 of the M6 and near the Samlesbury Enterprise Zone. The Development Framework identifies the potential to deliver a broad range of high-quality employment space, co-located with residential development in a liveable environment, supported by accessible infrastructure. Figure 1.1 shows the strategic location of the proposed development.

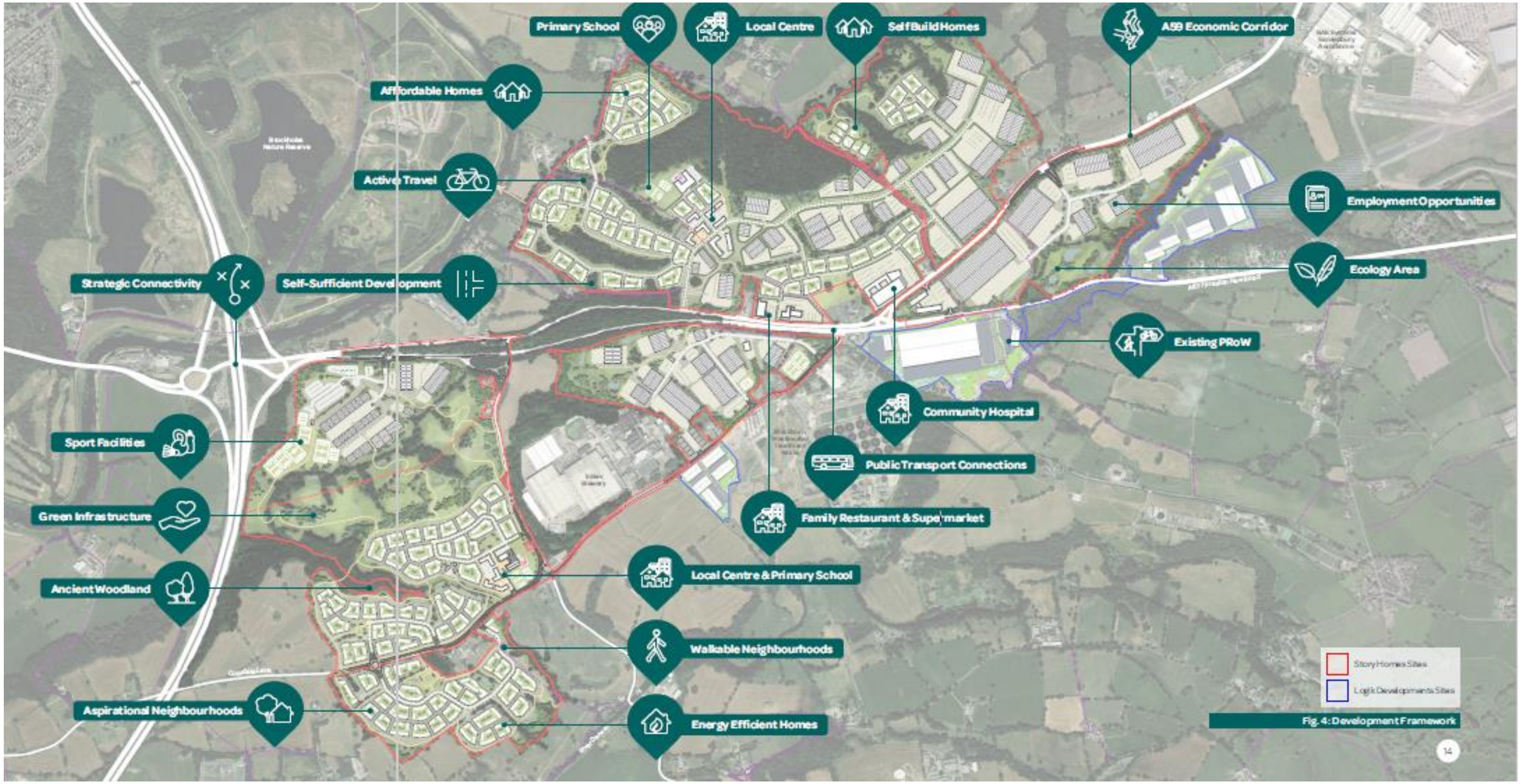
Figure 1.1: A59 Growth Corridor



Source: Cuerdale Garden Village Development Framework Document

1.3 The Development Framework for Cuerdale Garden Village provides a visual illustration of the uses envisaged, which is replicated at Figure 1.2 overleaf.

Figure 1.2: Cuerdale Garden Village Development Framework



Source: Story Homes

1.4 The proposed development has the capacity to provide in the order of:

- 429,500 sqm of employment floorspace, measured as gross internal area (GIA). This includes larger scale logistics space through to smaller scale SME sized facilities, including office, research and development and advanced manufacturing space;
- 2,300 high-quality new homes of varied type and size, including affordable homes; and
- Supporting social and green infrastructure.

1.5 The above development quantums account for the land being promoted by Story Homes, which extends to 284ha, and includes the development sought through an outline planning application, representing a first phase, which was submitted by Story Homes in May 2022[1]. It also includes what has been referenced as an eastern extension which is being promoted by Logik Developments as part of the overall Garden Village proposal, which is also subject to a live planning application submitted to South Ribble Borough Council in January 2023[2].

Report scope

1.6 This report critiques the proposed approach towards employment land provision within the draft Local Plan ("R19 LP"), which anticipates a more limited need than the previous version that was subject to consultation in December 2022 ("R18 LP").

1.7 The R19 LP seeks to justify the reduction in need with reference to the findings of an updated Employment Land Study[3] (ELS) which is therefore reviewed and critiqued in this report.

1.8 Particular consideration is given to the impact of the ELS having not allowed for major investments, such as the National Cyber Force (NCF) headquarters coming forward within the Samlesbury Enterprise Zone.

1.9 Story Homes has separately commissioned B8 Real Estate (B8RE) to undertake a high-level review of the employment land supply identified in the ELS, and the allocations proposed within the draft Local Plan. This report draws out the headlines of this assessment, included at **Appendix 1**, identifying key concerns around the sites' collective ability to meet needs in full over the plan period. It also identifies a failure to respond to the Lancashire Combined County Authority's (LCCA) explicit identification of a need for a new generation of large strategic sites to be planed for to realise its economic growth ambitions.

1.10 Drawing on agency insight from B8RE the report identifies that there is currently a pressing need for employment land across Central Lancashire. This is expected to be

[1] Planning application reference 07/2022/00451/OUT

[2] Planning application reference 07/2023/00035/OUT

[3] BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024; Preston City Council, Chorley Council and South Ribble Borough Council (February 2025)

sustained, not least to capitalise on potential occupier interest and economic benefits arising from the NCF, with the supply of employment land currently identified considered unlikely to meet needs in full over the plan period. This report outlines the opportunity presented by Cuerdale Garden Village within this context, noting its spatial proximity to the NCF and strategic road corridors.

1.11 The identified limitations of the evidence and its translation into planning policy result in a failure to plan positively and support the needs of the modern economy, as required explicitly by the NPPF (paragraphs 85 and 86).

Report Structure

1.12 This report is structured as follows:

- **Section 1:** Introduction
- **Section 2:** Proposed approach of the Local Plan and informing evidence
- **Section 3:** Strategic context
- **Section 4:** Critique of the reported need
- **Section 5:** Critique of the identified supply
- **Section 6:** Conclusion

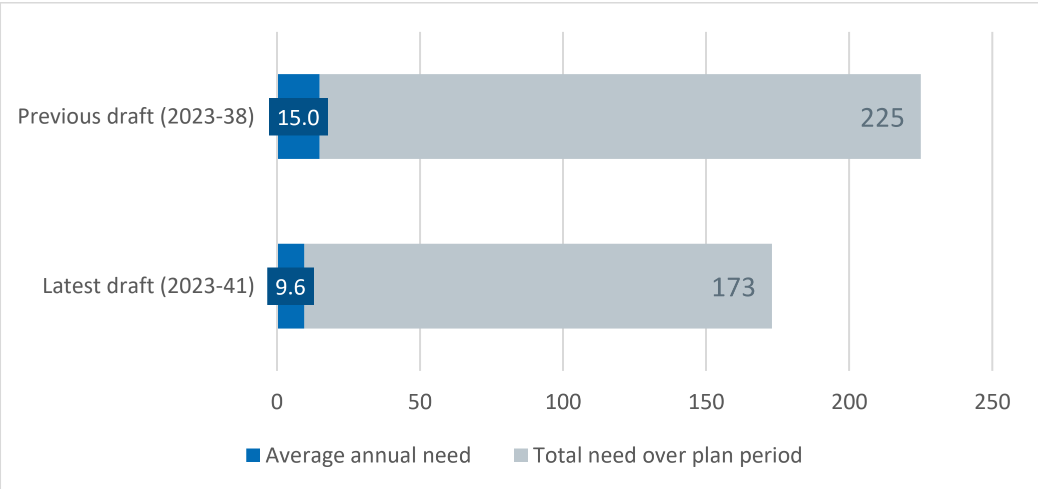
2. Proposed Approach of the Local Plan and Informing Evidence

Reported need for employment land

2.1 In previously consulting on Preferred Options for the new Local Plan, in December 2022, the Councils reported that there was an '*objectively assessed need for a minimum of 225 hectares of net additional employment land*', equivalent to circa 15.0ha per annum over the plan period then proposed[4] (2023-38). This was based on an update to the Employment Land Study (ELS) which had been completed in February 2022[5].

2.2 A further update has though now been published, as of February 2025, leading the R19 LP that is currently subject to consultation to refer at Policy EC1 to a much smaller need for only 173ha of employment land, claiming also that this captures '*both local and wider strategic employment needs*'[6]. This reduction has come despite the plan period having been extended by three years to 2041, with the average annual need over this longer period some 36% lower than previously reported at only 9.6ha per annum.

Figure 2.1: Evolution of Reported Need for Employment Land (total and annual)



Source: Central Lancashire authorities; Turley analysis

[4] Preston City Council, Chorley Council and South Ribble Borough Council (December 2022) Central Lancashire Local Plan: preferred Options – Part One Consultation, p58

[5] BE Group (February 2022) Central Lancashire – Employment Land Study Update

[6] BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024; Preston City Council, Chorley Council and South Ribble Borough Council (February 2025) Central Lancashire Local Plan 2023-2041, p86

2.3 The R19 LP indicates that the greatest need is for industrial and warehousing land, with circa 154.6ha reported to be needed between 2023 and 2041. This is over eight times the reported need for land suited to offices (18.2ha).

Table 2.1: Reported Need for Employment Land (ha; 2023-41)

	Chorley	Preston	South Ribble	Central Lancashire
Industrial/warehousing	34.97	68.43	51.23	154.63
Offices	6.48	6.00	5.76	18.24
Total	**41.45**	**74.43**	**56.99**	**172.87**

Source: Central Lancashire authorities

2.4 The latest iteration of the ELS not only suggests that '*a substantially revised forecast methodology*' has been used, compared to the previous version completed in 2022, but also confirms that different approaches have been used to separately estimate the need for land suited to offices and industrial/warehousing space[7]. The need for:

- **Offices** has been calculated using a '*labour demand*' model, underpinned by a '*baseline or policy-off forecast*' from Cambridge Econometrics – developed late in 2023 – which makes '*no allowance for major public policy interventions*'[8]. Jobs are converted into full-time equivalents (FTEs) before those likely to need office space are identified, with an attempt having also been made to allow for greater homeworking. A buffer equivalent to an extra five years' job growth is also believed to have been applied.

- **Industrial and warehousing land** has been based on past take-up over the period from 2010 to 2023, in a notable change from the previous ELS which extrapolated the much longer-term trend over thirty years back to 1991. A gross, rather than net, figure has been favoured for Preston to allow for the replacement of losses but this has not been deemed necessary for Chorley or South Ribble, since neither are considered to have lost stock at the same rate[9]. A buffer equivalent to a further five years' take-up has though been added for each authority and allowance has also been made for a return to the level of vacancy needed in '*a well-functioning commercial property market*'[10].

2.5 It is of note that neither an approach based on past take-up, nor one derived from a baseline forecast which makes no allowance for interventions, allow for the impact of major investments like the NCF. The ELS openly admits that such '*strategic projects*' have not been taken into account, blaming this on a lack of '*clear forecasts of the jobs growth resulting from these schemes which could inform a Policy On forecast*'[11]. The

[7] BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, paragraph 1.11

[8] *Ibid*, paragraph 5.9

[9] *Ibid*, p87-89

[10] *Ibid*, p85-86

[11] *Ibid*, paragraph 3.8

R19 LP similarly takes no account of their impact either on need or supply, only stating – in the context of the NCF – that '*the Councils are working with Lancashire County Council to understand the opportunity this establishment will create, the timescale and how it might affect the wider economy*'[12].

Proposed supply

2.6 The R19 LP proposes to meet and indeed exceed the reported need by allocating around 218ha of employment land throughout Central Lancashire, with the Cuerden site in South Ribble alone responsible for almost a quarter of this total (50ha). It notably does not include any land at the Samlesbury Enterprise Zone, likely due to the latest ELS having reported that '*the National Cyber Force Campus will now take up a high proportion of the remaining land*' such that it is '*not clear what, if any, land will remain to meet further requirements*'[13].

Table 2.2: Identified Employment Land Allocations and Strategic Sites

	Strategic allocations	Employment allocations	Mixed use allocations	Total
Policies	SS5	EC2-4	EC5-6	
Chorley	–	7.68	12.66[14]	20.34
Preston	63.30	73.20	–	136.50
South Ribble	–	11.30	50.00	61.30
Central Lancashire	**63.30**	**92.18**	**62.66**	**218.14**

Source: Central Lancashire authorities

Summary

2.7 The R19 LP references a need for around 173ha of employment land throughout Central Lancashire over the period from 2023 to 2041. This has fallen from what was reported during the previous consultation, even with that having covered a shorter period only to 2038, with the average annual need now expected to be some 36% lower.

2.8 This has seemingly been caused by a further update to the Council's Employment Land Study, which was published in February 2025 and claims to have used '*a substantially revised…methodology*'. It anticipates the greatest need being for industrial and warehousing land, basing this on historic take-up between 2010 and 2023 with allowances made for healthier vacancy rates and the replacement of losses in Preston, in addition to a buffer. There is reported to be a substantially smaller need for offices, with this having been based on an unadjusted forecast that makes '*no allowance for*

[12] Preston City Council, Chorley Council and South Ribble Borough Council (February 2025) Central Lancashire Local Plan 2023-2041, paragraph 3.8

[13] BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, p137-138

[14] This is reported as 2.66ha in Policy EC5 but this is believed to have been a typographical error

major public policy interventions' like the NCF – blamed on uncertainty regarding associated job creation – but does attempt to allow for greater homeworking, before applying a buffer.

2.9 The R19 LP proposes to meet and indeed exceed the reported need by allocating around 218ha of employment land throughout Central Lancashire. This does include the Cuerden site in South Ribble but wholly excludes the Samlesbury Enterprise Zone, having been reasonably assumed that the NCF will fill most if not all of the remaining land.

3. Strategic Context

3.1 Before the proposed approach of the R19 LP is critiqued, this section summarises the strategic context in which it has been produced. It highlights an increased emphasis on supporting and enabling economic growth over the past year, and particularly since the change of Government in July 2024, with this being viewed as critical to improving resilience in every corner of the UK.

3.2 Within Lancashire itself, the changing national agenda has been reflected through the development of ambitious economic growth agendas, with various publications setting out the anticipated scale of investment and the support that is required at both the national and local level. In the case of the latter, it is clear that robust and positively prepared Local Plans are seen to be critical to successfully enabling growth, reflecting their role in providing the infrastructure – such as land – that is required to attract and retain investment of businesses and individuals.

Background

3.3 Since its election in July 2024, the Government has been clear in its view that '*sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people'*[15]. It has stated that its *'central mission'* is to '*restore economic growth'* and it also aims to deliver the infrastructure that the country needs[16].

3.4 It has established an aim *'for the highest sustained growth in the G7 – with more people in good jobs, higher living standards, and productivity growth in every part of the United Kingdom'*[17].

3.5 In setting the milestone for measuring progress, it has arguably retained the essence of the previous Government's commitment to "levelling up" by acknowledging that *'growth must be felt by everyone, everywhere, so we will track GDP per head at both a regional and national level to drive prosperity across the United Kingdom'*[18].

3.6 In this context, it affirms that *'the main route to higher living standards is through good, productive jobs, stable employment, and a thriving business environment, and we believe that growth must be felt in every nation and region'*[19].

3.7 In setting out its approach to realising this mission, the Government has stated that it will, *inter alia*:

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[15] MHCLG (August 2024) Proposed reforms to the National Planning Policy Framework and other changes to the planning system

[16] Speeches by the Chancellor, The Rt Hon Rachel Reeves MP, on 5/8 July 2024

[17] https://www.gov.uk/missions/economic-growth

[18] *Ibid*

[19] *Ibid*

- Work in partnership with businesses, creating the right conditions for investment through the National Industrial Strategy (considered below);

- Work with devolved governments and partner with mayors to develop local growth plans to give them the tools needed in areas like adult education, skills and employment support;

- Drive innovation, investment and the adoption of technology; and

- Help people get a job, stay in work, and progress in their careers, with good employment opportunities across the country. This is to be supported by the newly established Skills England and the Industrial Strategy Council, along with a reformed jobs and career service.

3.8 The delivery of the mission to kickstart economic growth is also predicated on the Government achieving a commitment to "rebuild Britain". The Treasury clearly anticipates that '*the government's housing targets, coupled with investment in supporting infrastructure, will remove barriers to economic growth'*[20].

National Planning Policy Framework

3.9 The Government quickly expressed an intention to '*reform*' the National Planning Policy Framework (NPPF) shortly after its election, in order to '*kickstart economic growth*'[21]. It launched a consultation on proposed reforms within weeks[22].

3.10 Following this consultation, the Government implemented wide-ranging and ambitions reforms to the NPPF in December 2024, with the primary aim of increasing housebuilding in England[23]. The Office for Budget Responsibility (OBR) expects these changes to increase gross domestic product by 0.2% by 2029-30 – adding £6.8 billion to the economy – and by over 0.4% in 2034-35[24].

3.11 The Government has been clear to set out that changes to the NPPF are just a first step in its ambitious package of reforms to get Britain building again, secure affordable quality homes for all and drive economic growth.

3.12 While the above signals an implicit step-change in national planning, the Central Lancashire authorities do intend for their own Local Plan to be examined in the context of the NPPF that was published in December 2023, taking advantage of transitional arrangements in the latest iteration[25].

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[20] HM Treasury (January 2025) 10 Year Infrastructure Strategy Working Paper – A Cross-Government Plan for Infrastructure, page 1

[21] Speech by the Chancellor, The Rt Hon Rachel Reeves MP, on 8 July 2024

[22] Ministry of Housing, Communities and Local Government (August 2024) Proposed reforms to the National Planning Policy Framework and other changes to the planning system

[23] Ministry of Housing, Communities and Local Government (December 2024) National Planning Policy Framework

[24] HM Treasury (March 2025) Spring Statement, p2

[25] Ministry of Housing, Communities and Local Government (December 2024) National Planning Policy Framework, Annex 1

3.13 Policies relating to economic growth and employment land are though very similar in both documents, with each setting a clear expectation that '*planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt*'[26]. Both confirm that:

"Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential"[27].

3.14 Both expect planning policies to *inter alia* '*set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*'[28]. They are also expected to '*address potential barriers to investment*' and '*be flexible enough to accommodate needs not anticipated in the plan*', so as to '*enable a rapid response to changes in economic circumstances*'[29].

3.15 There are though also some differences, with the newer version more explicit for instance in requiring planning policies to:

"…pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics"[30]

3.16 It also expects planning policies and decisions to '*recognise and address the specific locational requirements of different sectors*', for instance by making provision for:

- Clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);

- Storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and

- The expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience[31].

[26] Paragraph 85 of both the 2023 and 2024 NPPF
[27] *Ibid*
[28] Paragraph 86 of both the 2023 and 2024 NPPF
[29] *Ibid*
[30] Ministry of Housing, Communities and Local Government (December 2024) National Planning Policy Framework, paragraph 86c
[31] *Ibid*, paragraph 87

Invest 2035: the UK's Modern Industrial Strategy

3.17 The latest version of the NPPF also updates an historic reference to the previous Government's Industrial Strategy, which could arguably have already been interpreted as a reference to the equivalent document of the new Government – published for consultation in October 2024[32] – even without this being explicitly stated.

3.18 It is nonetheless now clear that "Invest 2035" is intended to be '*the UK's modern industrial strategy*', with an expectation that planning policies have regard to this document in developing '*a clear economic vision and strategy which positively and proactively encourages sustainable economic growth*'[33].

3.19 While the strategy could technically change following last year's consultation, with the Government believed to still be '*analysing…feedback*' and intending to publish a final version alongside the Spending Review in June, the NPPF explains that a series of '*priority sectors for growth and support*' have been identified[34]. Amongst them are defence and digital technologies, both of which are highly relevant to the NCF.

3.20 Invest 2035 acknowledges that '*the UK's defence sector is a global leader*', providing '*good, well-paid jobs*' which benefit the entire country given that all but a third of its spending with UK industry and commerce goes outside of London and the South East. Defence is clearly seen to be a driver of innovation – leading to '*positive spillovers across the economy*' – and it can also '*boost the prosperity*' of UK residents, with '*a better, more innovative and more resilient defence sector*' allowing '*opportunities presented by the technologies of the future*' to be seized for example[35]. Reference is made to a forthcoming Defence Industrial Strategy that will both strengthen the sector and align '*security and economic priorities*', and while this is still awaited at the time of writing the Ministry of Defence has published a "Statement of Intent" which makes clear the aim to '*drive economic growth and create new long-term partnerships between government and business*'[36]. The Spring Statement continues to signpost the future publication of this strategy, which is expected to transform the defence sector into '*an engine for growth*' capable of benefiting people in all nations and regions of the UK[37].

3.21 Digital sectors and other technologies are described as having '*transformed*' the economy making it '*fundamentally different to where it was a decade ago*'[38]. The sector is seen to be '*at the forefront of geopolitical competition*' such that '*developing its strengths can enhance the UK's security and prosperity*'. The Government clearly views the country as being '*well positioned to build on its success and develop the next wave of groundbreaking digital and technology companies*', aided by its '*world-leading*

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[32] UK Government (October 2024) Invest 2035: the UK's Modern Industrial Strategy

[33] Ministry of Housing, Communities and Local Government (December 2024) National Planning Policy Framework, paragraph 86a and footnote 43

[34] *Ibid*, footnote 43; https://www.gov.uk/government/consultations/invest-2035-the-uks-modern-industrial-strategy; HM Treasury (March 2025) Spring Statement, paragraph 2.57

[35] UK Government (October 2024) Invest 2035: the UK's Modern Industrial Strategy, p23-24

[36] *Ibid*, p23-24; Ministry of Defence (December 2024) Defence Industrial Strategy: statement of intent

[37] HM Treasury (March 2025) Spring Statement, paragraphs 2.8 and 2.10

[38] UK Government (October 2024) Invest 2035: the UK's Modern Industrial Strategy, p24

research, strong culture of innovation, and thriving start-up system, backed by a deep talent pool and the investment required to grow and scale sustainable businesses globally'[39].

3.22 Advanced manufacturing is one of the other eight growth driving sectors. Recognising the regional and Lancashire strengths in the sector it is of note that the national strategy recognises that majority of manufacturing jobs lie outside of London and the South East and that the sector is an important driver of innovation. The Strategy states that: *'The UK is entering a major investment cycle, where the net zero and digital transformations present considerable opportunities for UK manufacturing investment.'* It proceeds to highlight, however, that the UK faces global competition and there is a requirement for the Government to ensure that the UK has a competitive offer across all of the factors that influence investment, removing barriers and building on UK strengths. It identifies that these strengths include the world-class network of universities and research institutions. This is important in the context of the location of Lancaster and Central Lancashire Universities as well as facilities such as the Advanced Manufacturing Research Centre (AMRC) on Samlesbury Enterprise Zone.

Lancashire Economic Strategy

3.23 Lancashire County Council (LCC) is clearly committed to delivering economic growth and prosperity, as set out in its Economic Strategy for the period from 2023 to 2025[40].

3.24 This confirms, amongst other things, a commitment to '***bring forward strategic sites,*** *support business growth and deliver the skills to realise these ambitions'*[41] (emphasis added).

3.25 It highlights the ongoing programme of investment across the county, stating that:

"Lancashire has a significant, multi-billion pound development and infrastructure pipeline together with a mix of high-performing, well-established businesses, with long and settled roots in the Lancashire economy, a new wave of low carbon and security-based investments is supplementing Lancashire's economy, ***typified by the UK government's decision to locate the new National Cyber Force headquarters in Samlesbury"***[42] (emphasis added)

3.26 It specifically recognises the importance of having a supply of employment land to facilitate growth. It confirms that LCC will *'maintain and enhance an infrastructure and range of employment sites*' in order to:

- Allow enterprise to flourish and employees to engage in the economy wherever they live in the county; and

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[39] *Ibid*, p24

[40] Lancashire County Council (2023) Lancashire County Council Economic Strategy 2023 – 2025

[41] *Ibid*, Foreword

[42] *Ibid*, executive summary

- Realise the growth potential in existing and emerging key sectors, and to attract increased investment[43].

Emerging Lancashire Growth Plan

3.27 The Lancashire Combined County Authority (LCCA) – comprised of LCC plus the unitary authorities of Blackpool and Blackburn with Darwen – was officially established in early 2025, and it has already launched a consultation on a Growth Plan for the period from 2025 to 2035[44].

3.28 The Plan establishes its intent to provide *'a platform to restate our ambition, our potential, our innate strengths and the unique contribution we can make to our national growth mission.'*[45]

3.29 It recognises Lancashire's existing strengths, observing that:

"With a population of 1.53 million and a Gross Value Added (GVA) of £40 billion, Lancashire is the second-largest economy in the North West, with growth potential of national significance still to be unlocked"[46].

3.30 It proceeds to identify that the Lancashire economy is defined by strengths in advanced engineering and manufacturing; nuclear energy; cybersecurity; artificial intelligence; and sustainable industries. These strengths are broadly reflected in five identified priority sectors.

3.31 The Plan sets out a 10-year investment package valued at over £20 billion overall, stating that:

"If supported, both locally and nationally, this investment will transform Lancashire's economic prospects and contribute to the Government's mission to supercharge the nation's growth performance"[47].

3.32 In setting out the support required from national Government, it requests national recognition of the strategic importance of local industrial strengths and the opportunities provided to leverage further national investments, referencing *inter alia*:

- BAE Systems' Global Combat Air Programme, Eurofighter Typhoon and F35 Lightning contributions;
- Leyland Trucks' commercial vehicles;
- Enhancing supply chain capabilities for these and similar sectors, including the Government's AUKUS submarine; and

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[43] *Ibid*, "Our 2025 Vision"

[44] Lancashire Combined County Authority (February 2025) The Lancashire Growth Plan 2025 – 2035, consultation version

[45] *Ibid*, Foreword 1

[46] *Ibid,* Executive Summary

[47] *Ibid,* Executive Summary

- New investment facilitating and leveraging the development of the NCF through unified programmes to support research, skills development, local industry engagement and key place-based initiatives.

3.33 The Plan identifies a number of '*foundations for growth'* or '*enablers*' of relevance to the whole of Lancashire, which include the need to:

"Develop transport, housing, ***and strategic sites*** *to support and accelerate economic growth, focusing on* ***key clusters and corridors to enhance connectivity and collaboration***"[48] (emphases added).

3.34 The Plan includes what is referred to as the '*Growth Map*'. This restates the importance of the east-west arc stretching between Blackpool and Blackburn, with Central Lancashire – and notably the Samlesbury Enterprise Zone – at its heart as one of several '*Anchor Strategic Sites*'[49].

[48] *Ibid,* page 13

[49] *Ibid*, p16

Figure 3.1: Lancashire's Growth Map

Source: LCCA

3.35 This spatial plan emphasises the importance of delivering investment in infrastructure, not only in terms of transport but also housing which LCCA notes as being needed to sustain business investment and accommodate a growing labour force. It references a review of housing growth prospects across the county and notes that this has identified the *'potential for the new LCCA to help design and drive economic and housing growth* *plans in synergy with local planning authorities to deliver a much stronger and complementary set of outcomes for the region'*[50].

3.36 It also proceeds to identify in the same context that:

"There are nationally significant sectors and employment hubs within Lancashire, most notably focussed 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 clean energy, Net Zero future"*[51] (emphases added).

3.37 Critically, in the context of this report and the focus on employment land provision, LCCA is clear to conclude 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****"*[52] (emphasis added).

3.38 LCCA is clearly aware of '*the trend for larger sites, especially from global firms*' who have historically invested in Lancashire, with the county noted as attracting '*a significant amount of foreign investment from the USA*'. It aims to address this by seeking to '***develop larger and more suitable sites*** *to accommodate a range of occupiers, both domestic and international, as well as large-scale international investors*'[53] (emphasis added). This would bolster what is acknowledged to be '*a short supply of large strategic sites across the north of England*', while also giving existing businesses the opportunity to move to new premises in order to '*operate sustainably and competitively in the future*'[54].

Invest in Lancashire

3.39 Even prior to the formation of the LCCA, LCC has been promoting the strength of the county's economy and identifying opportunities for local businesses to invest. It published an Investment Prospectus in 2024, called "Invest in Lancashire", which identified the following opportunities in Central Lancashire:

[50] *Ibid*, p32
[51] *Ibid,* p32
[52] *Ibid*, p32
[53] *Ibid*, p32
[54] *Ibid*, p32

- **Samlesbury Enterprise Zone** – providing opportunities in advanced manufacturing, engineering, and research driven sectors such as cyber, robotics and future flight. LCC notes the investment of BAE Systems to date, including in its aviation engineering campus and the Advanced Manufacturing Research Centre North West. It identifies that the establishment of the NCF means that Samlesbury is set to become a nucleus for cyber innovation. It also references the planed Innovation Hub, which is intended to work alongside the NCF to harness expertise in cyber technology, providing around 20,000sqft of space for businesses.

- **Preston City Centre / Stoneygate / The Harris Quarter / Preston Station Quarter** – a range of ambitious urban regeneration initiatives, the latter of which alone could provide up to 200,000sqft of new office space in its first phase alongside residential development.

- **Lancashire Central** – seen to be one of the biggest development opportunities in the North West, with the potential to generate up to 5,600 full time jobs. These jobs will include opportunities generated by the development of new commercial floorspace where it identifies the potential to deliver industrial, manufacturing and logistics units ranging from 17,500sqft to 670,000sqft.

Summary and implications

3.40 The new national Government has expressly focused on delivering economic growth, which it sees as being critical to improving lives and addressing longstanding geographic inequalities. It has explicitly recognised the important role of planning in facilitating economic growth, with the introduction of planning reforms one of its first actions in Government. It continues to propose changes to national policy and guidance to ensure that planning supports its growth ambitions and does not act as an impediment.

3.41 The Government also rapidly consulted on a new industrial strategy, which provides clarity on the sectors of the economy that are seen to have the greatest potential to drive growth. These include advanced manufacturing, defence and digital technologies sectors, all of which are highly relevant to Central Lancashire with the latter two particularly applicable to the NCF.

3.42 The newly formed LCCA has sought to align its emerging Growth Strategy, currently out for consultation, with this new national agenda. It affirms the strengths of Lancashire in the above sectors, amongst others. It specifically recognises investment in Central Lancashire, particularly with the NCF coming forward in the Samlesbury Enterprise Zone, and affirms the importance of providing supporting infrastructure to realise associated benefits. It **clearly recognises the need for additional strategic employment sites, and the trend towards larger sites from global firms in particular**, and also aims to ensure that the right amount and type of housing is planned for to attract a highly-skilled workforce.

4. Critique of the Reported Need

4.1 The ELS confirms that different methods have been used to respectively estimate the need for industrial/warehousing and office space. Each are considered to have limitations that threaten to significantly understate the amount of land needed throughout Central Lancashire over the plan period to 2041.

Perpetuating undersupply when extrapolating past take-up

4.2 It has been noted in section 2 that the bulk of the reported need for 173ha of employment land in Central Lancashire is attributable to industrial and warehousing space, the need for which has been estimated based on take-up over the period from 2010 to 2023.

4.3 While there is generally agreed to be merit in such an approach, it does have the potential to simply sustain undersupply if recent provision has been insufficient.

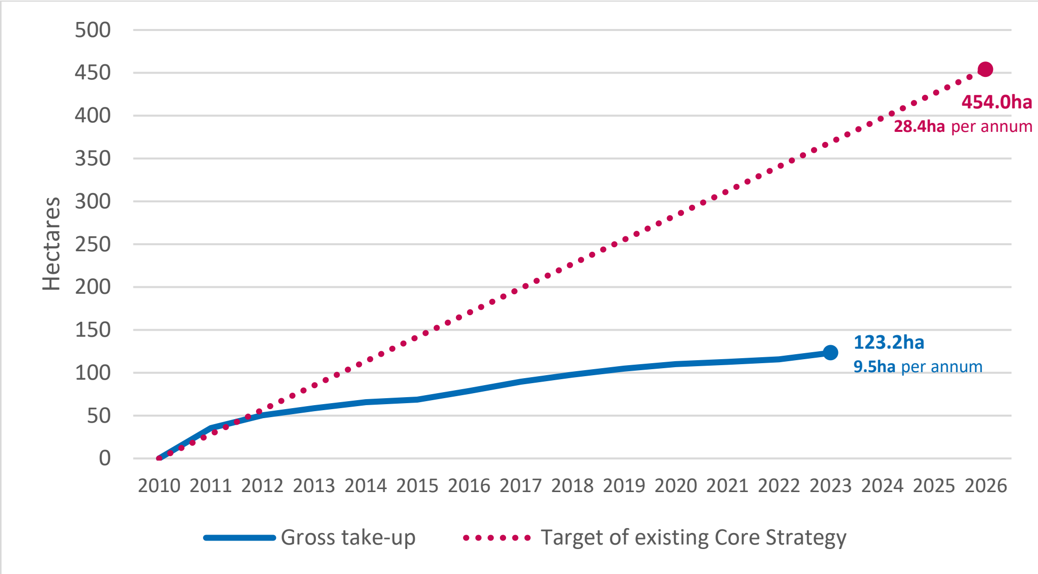
4.4 There is evidence to suggest that this has indeed been the case in Central Lancashire, with B8RE reporting a widespread view amongst the industrial property market of there having been '*a chronic shortage of new build space and "oven ready" development sites*' within this particular area. Their report at **Appendix 1** also identifies numerous outstanding requirements that are yet to have been satisfied, with the lack of suitable space in Central Lancashire forcing some to look elsewhere.

4.5 The Councils themselves appear to have accepted that the recent rate of development has been insufficient, in the context of what is still referred to as a '*target*' from the existing Core Strategy which aimed to provide some 454ha of employment land between 2010 and 2026[55].

4.6 While their monitoring still only covers the period to 2023, technically giving three further years in which to achieve the target, it is almost certain that the Councils will fall significantly short. They have collectively delivered only 123ha of employment land, gross – equivalent to barely a quarter (27%) of the target – and this has been occurring at an average annual rate that has been only around a third of what would be needed to meet it.

[55] Preston City Council, Chorley Council and South Ribble Borough Council (July 2012) Central Lancashire Adopted Core Strategy, Table 5; Preston City Council, Chorley Council and South Ribble Borough Council (2024) Central Lancashire Core Strategy Monitoring Report, covering the period April 2020 – March 2023, p9

Figure 4.1: Past Take-up vs. Target of Adopted Core Strategy (2010-26)



Source: Central Lancashire authorities; Turley analysis

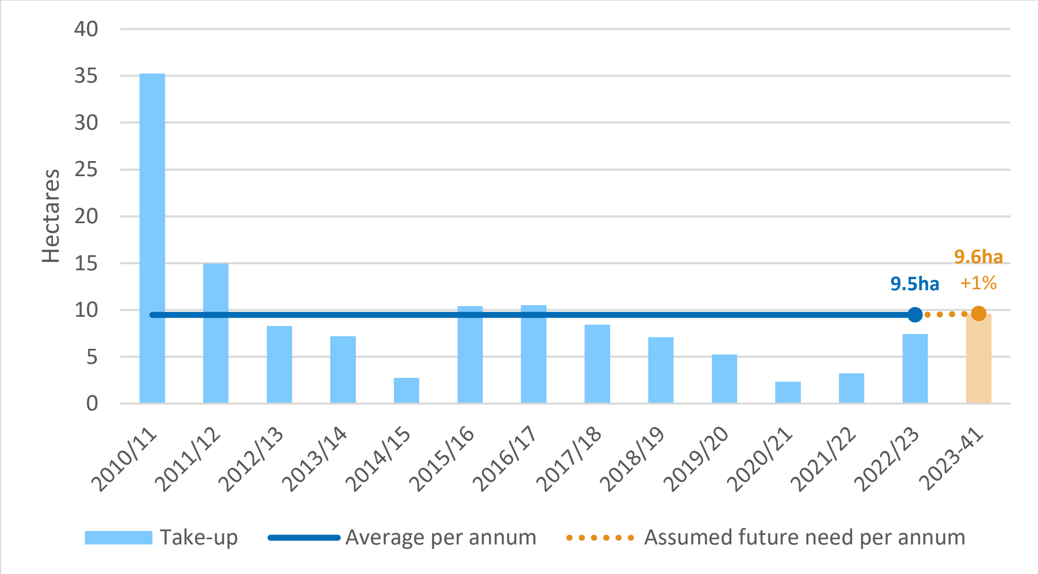
4.7 The Councils admit in their monitoring report that the take-up of employment land since 2010 has been '*below the Core Strategy target*', but this does not appear to have been taken into account or even acknowledged in an ELS that simply extrapolates this trend[56].

4.8 It is accepted that the ELS subsequently makes various adjustments in arriving at the conclusion that 173ha of employment land is needed, with allowances made for buffers and healthier vacancy rates for example[57]. An approach based on labour demand, as opposed to past take-up, is also ultimately favoured for offices. The overall outcome does though remain an implied level of need that is only 1% above the recent trend, on an average annual basis, with an assumption therefore having implicitly been made that the rate of development will not increase. This appears contrary to the ambitions documented in the previous section, as would the setting of a headline target for 173ha of employment land which equates to only 38% of what was previously planned over a shorter period.

[56] Preston City Council, Chorley Council and South Ribble Borough Council (2024) Central Lancashire Core Strategy Monitoring Report, covering the period April 2020 – March 2023, p9

[57] Story Homes is part of a consortium that commissioned Stantec to undertake an assessment of housing need in Central Lancashire, to inform representations to the ongoing consultation. This contains property market analysis which indicates that as of early 2025, industrial vacancy rates in Central Lancashire remain below what they consider to be the equilibrium (7.0%) which compares to the benchmark used in the ELS (7.5%)

Figure 4.2: Past Take-up vs. Assumed Future Need



Source: Central Lancashire authorities; Turley analysis

Excessive deductions in labour demand model

4.9 As noted above, the ELS opts for a labour demand model to estimate the future need for office space, arguing that this is '*likely to best project…needs moving forward*' and claiming that it will also facilitate links with assessments of housing need, which will be at least partially informed by the same forecasts of job creation[58].

4.10 This arguably does not present the strongest case in favour of the chosen approach, nor for dismissing an alternative based on past take-up which – though not without its own issues – appears likely to have suggested a greater need. A continuation of gross take-up rates plus a five-year buffer would be expected to generate a need for some 34.6ha of land suited to offices, whereas the ELS concludes that barely half as much – only 18.2ha – will be needed[59].

4.11 Even if the merits of a labour demand model for offices were accepted – and the surprising use of only one forecast, rather than a range, was overlooked[60] – there are grounds to believe that the amount of space needed to accommodate the jobs envisaged by the chosen forecast will still be higher than estimated by the ELS, due to some of the methods that it has used.

4.12 It makes an adjustment, for example, to the baseline employment forecast that was produced by Cambridge Econometrics, with the aim of measuring only full-time

[58] BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, paragraph 3.54

[59] *Ibid*, Table 21. Average annual rates gross of losses have been multiplied by 24 years to reflect the 19-year plan period plus a buffer of five years.

[60] The assessment of housing needs commissioned by a consortium that includes Story Homes presents an alternative forecast from Oxford Economics, for example, which envisages around 10,000 more jobs being created throughout Central Lancashire over the period from 2023 to 2041

equivalent (FTE) jobs rather than all roles[61]. This in itself is not unreasonable, since the amount of space needed to accommodate a full-time role will realistically be less than a part-time one. The ELS does though appear to make a fundamental error at this stage of its calculation. It refers to a measure of '*full time jobs as a percentage of all jobs*' that existed in each area as of 2022, and appears to apply this ratio to the total number of jobs forecast in each sector, but such an approach automatically discounts any part-time jobs and assumes that they will not require *any* office space which is unlikely to be the case[62]. This could have been avoided, and typically is in comparable studies, by retaining half of whatever is discounted when the ratio is applied. This takes part-time jobs into account but reasonably assumes that they require less space, effectively assuming that two part-time jobs need as much space as a full-time one. If the ELS had taken this approach, it would have factored an additional 2,775 FTE jobs into its calculations which is some 25% more than have seemingly been taken into account, across all sectors[63].

Table 4.1: Correcting Conversion of All Jobs to FTE

	Chorley	Preston	South Ribble	Central Lancashire
Workforce jobs	5,675	5,493	5,492	16,660
Reported FTE jobs	**3,788**	**3,533**	**3,790**	**11,111**
Implied part-time jobs…	1,887	1,960	1,702	5,549
…converted to FTE[64]	944	980	851	2,775
Corrected FTE jobs	**4,732**	**4,513**	**4,641**	**13,886**
Difference	+944	+980	+851	+2,775
% difference	+25%	+28%	+22%	+25%

Source: BE Group; Turley analysis

4.13 The ELS also appears to have made an excessive allowance for homeworking. It has taken the rates recorded at the last Census in March 2021 – a point during the COVID-19 pandemic when all were forbidden from travelling to work unless absolutely necessary – and seemingly assumed that the same proportion of those filling newly created jobs in '*office-based sectors*' will be exclusively working from home in future[65]. This serves to remove a further 1,709 FTE jobs from the calculations, reducing the overall number of additional jobs across all sectors by some 15%[66].

61 BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, paragraph 3.21

62 *Ibid*, p77-79

63 *Ibid*, Tables 16-18

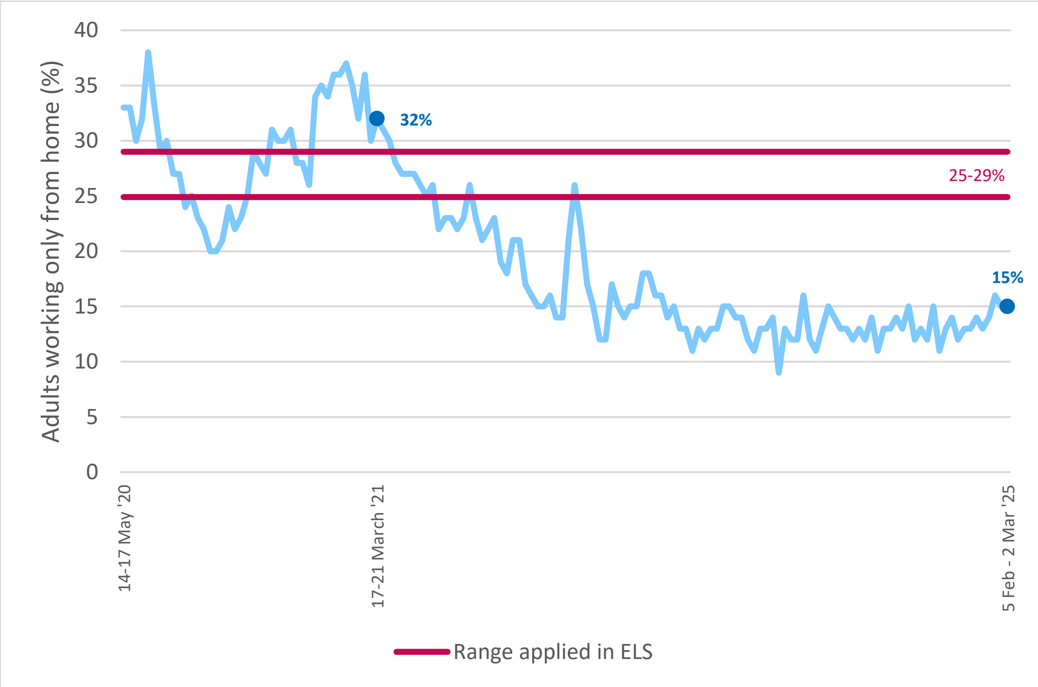
64 Assuming that two part-time jobs equal one FTE

65 BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, paragraph 3.24

66 *Ibid*, Tables 16-18

4.14 While it is not necessarily unreasonable to make at least some allowance for people that work only from home, who are agreed to not require office space, the ELS provides no evidence that such a large number will be doing so in future. It is inconceivable that homeworking will be continuing at the rates of 25-29% that were recorded in Central Lancashire at the height of the pandemic, in March 2021, given that nationally the Office for National Statistics (ONS) has found the proportion of adults working only from home to have more than halved since the week of the Census[67].

Figure 4.3: Proportion of Adults Working Only from Home in Great Britain



Source: ONS

4.15 The ELS does accept that the data collected through the 2021 Census may '*exaggerate present homeworking rates, much less homeworking levels moving forward to 2041*'[68]. It appears only to have used it out of necessity, with stakeholders having been unable to '*confirm what proportion of their staff now work mostly from home and what proportion work on a hybrid basis*'[69] (with the latter rightly noted as still requiring some office accommodation). A scenario that sustains the rates recorded in 2021 is crucially first introduced as one of two, designed to illustrate '*the uncertainties around present and future homeworking rates*', but this nuance is lost as the assessment continues and the scenario described as '*net of homeworking*' is ultimately favoured having been deemed '*more realistic at this time*'[70]. This does appear to imply that the other, so-called '*gross*' scenario makes no allowance for homeworking but this is not the case, as

[67] ONS (March 2025) Public opinions and social trends, Great Britain: working arrangements
[68] BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, paragraph 3.26
[69] *Ibid*, paragraph 3.26
[70] *Ibid*, paragraphs 3.27 and 3.56

it applies employment densities that were developed after '*a significant rise*' up to 2015, driven by '*growth in self-employment, improved broadband connectivity, property prices, commuting distances and efficiency and cost savings*'[71]. The ELS arguably could have opted for this as a more cautious scenario, or chosen a midpoint between the two rather than effectively assuming that homeworking will continue at an exceptionally high rate. This would have further increased the need for office space, especially in combination with the more accurate conversion to FTE employment, and thus elevated the headline need for 173ha of employment land.

Omission of the NCF and other strategic projects

4.16 The reported need for employment land would have likewise also been higher if an attempt had been made to account for strategic projects, rather than simply using an unadjusted baseline forecast developed by Cambridge Econometrics.

4.17 As noted in section 2, the ELS accepts that its methods are '*policy off*' having made '*no allowance for any major public sector programmes which might generate jobs above the baseline*'[72]. It does acknowledge that there are '*strategic projects proposed in Central Lancashire…most notably the development of the National Cyber Security Centre [NCF] at Samlesbury*', but it reports there to be '*no clear forecasts of the jobs growth resulting from these schemes which could inform a Policy On forecast*' and thus makes no attempt to develop one[73].

4.18 It is accepted that the sensitive nature of the investment creates uncertainty around the economic impact of its development and any spin-off activities, which is unusual for a publicly funded investment of such scale. Estimates are though entering the public domain, as LCCA has recently stated in consulting on its emerging Growth Plan that:

*"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"*[74] (emphases added).

4.19 It is understood that further detail regards the profile of employment directly employed within the new facility will continue to emerge as space is occupied. It is also understood that LCC intend to continue to assemble evidence that explores the opportunity for the investment to generate additional indirect economic benefits within the locality.

4.20 While it is unlikely that all of these jobs will be contained within Central Lancashire, or indeed even the wider county given the scheme's regional significance, there will still

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[71] Homes and Communities Agency (November 2015) Employment Density Guide: third edition, paragraphs 3.36-3.38

[72] BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, paragraph 3.8

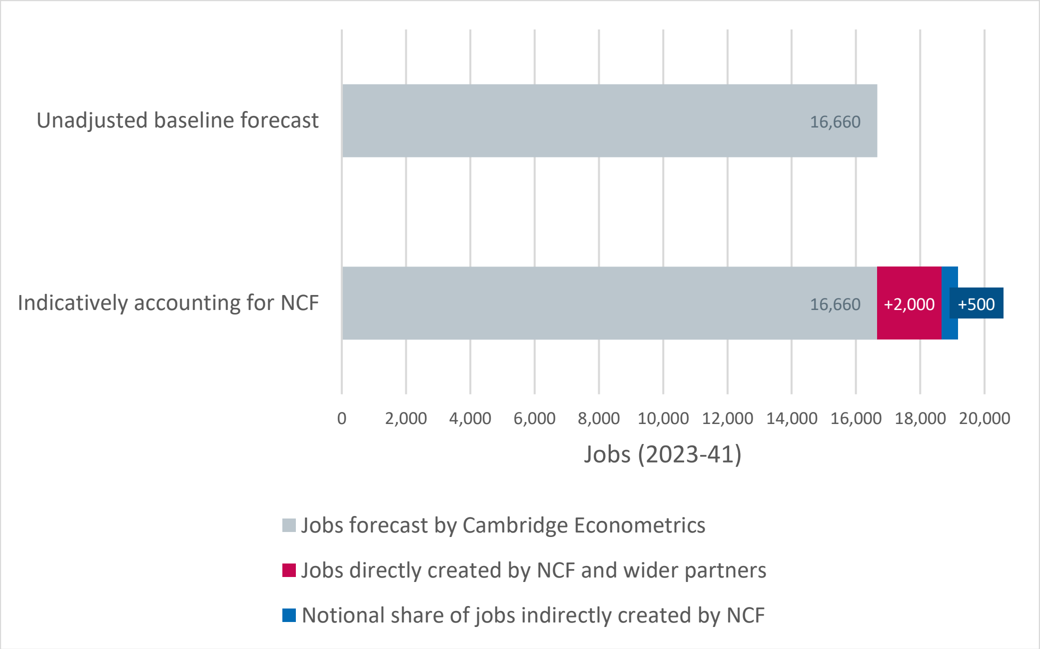
[73] *Ibid*, paragraph 3.8

[74] Lancashire Combined County Authority (February 2025) The Lancashire Growth Plan 2025-2035: consultation version

be a clear opportunity for the area to retain many of the spin-off activities and thus maximise the benefits of the facility being located here. This will though depend on suitable premises being available, emphasising why strategic investments like the NCF must be taken into account when estimating the future need for employment land. Failure to do so, as currently, would simply ignore a key ask of the emerging Lancashire Growth Plan which requires local support to realise its proposed 10-year investment package, outlined in section 3.

4.21 Even if only 500 of the jobs indirectly generated by the NCF are retained in Central Lancashire, equivalent to less than half, this would still combine with the number working on site or with wider partners to give an additional 2,500 workers in the area. Adding these jobs to a baseline forecast that does not take them into account but envisages 16,660 other jobs being created, would serve to increase it by some 15% and likely also increase the amount of employment land needed by a substantial amount.

Figure 4.4: Potential Impact of NCF on Baseline Forecast of ELS



Source: Cambridge Econometrics; Plexal; Turley analysis

Summary

4.22 The ELS uses different methods to estimate the need for land suited to industrial/warehousing and office use, but both have limitations that threaten to significantly understate the amount of land needed over the period to 2041.

4.23 The average take-up rate since 2010 has essentially been extrapolated to estimate the future need for industrial and warehousing land, but such an approach – though admittedly not without merit – wholly fails to account for the fact that almost four times as much employment land was intended to be developed over the same period, based on an existing Core Strategy that set an overall target nearly three times larger than now proposed (454/173ha). Extrapolating the recent trend threatens to simply sustain what the industry perceives to be a chronic undersupply, and this is not rectified even by the various adjustments made in the ELS – nor its favouring of a different approach for offices – given that the resulting annual need is only 1% above the recent trend. There is consequently an inherent assumption that the rate of development will not increase, contrary to the ambitions of both the Government and the newly-established LCCA which were documented in the previous section.

4.24 The ELS offers relatively weak justification for its use of a different model to estimate the need for land suited to offices, rather than using a past take-up approach that is admittedly imperfect but would still suggest a need for almost twice as much land (34.6/18.2ha). Even if its arguments in favour are accepted, and its consideration of only one forecast rather than a range is overlooked, the amount of land needed to accommodate jobs requiring office space will likely still be higher than estimated in the ELS, because:

- **A fundamental error appears to have been made in converting its preferred forecast into full-time equivalent jobs**, with part-time roles having seemingly been excluded rather than converted into FTE as is common in similar studies. This leads the ELS to wrongly discount some 2,775 FTE jobs across all sectors, the reinstatement of which would grow the number of additional FTE jobs to be accommodated by 25%.

- **An excessive allowance has been made for homeworking**, assuming that this will continue at the rate recorded in March 2021 – in the depths of the COVID-19 pandemic – when national evidence suggests that the tendency to work exclusively from home has since more than halved. The ELS admittedly makes this assumption only out of necessity, presenting it as one of two scenarios, but it does underpin its ultimate conclusion seemingly in the belief that the alternative would allow no homeworking, which is actually not the case. A more cautious approach could and should have been taken, so as not to exaggerate the number of jobs that will not require space in offices and in doing so disregard over 1,700 FTE jobs.

- **The forecast could and should have been adjusted to allow for strategic projects like the NCF**, despite claims to the contrary in an ELS that openly makes no attempt to take them into account blaming a lack of information. While there is acknowledged to have been an unusual amount of uncertainty around the economic impact of the NCF, due to its sensitive nature, estimates are now entering the public domain. LCCA has recently been consulting on a Growth Plan that envisages 2,000 personnel, including wider partners, and anticipates some 3,120 jobs being directly or indirectly created as a result of the investment. Not all will be contained within Central Lancashire or even the wider county, but even if, on a cautious basis, only 500 of the jobs indirectly generated are retained in the local area – taking the opportunity that will exist to retain at least some spin-off activities – then this, combined with the number working on site or with partners, would generate 2,500 extra workers in Central Lancashire who do not feature in the forecast used in the ELS.

5. Critique of the Identified Supply

5.1 As introduced in section 2, the R19 LP proposes to allocate sites that would collectively provide around 218ha of employment land. This is spread across some 17 individual sites, over half of which envisage employment coming forward alongside other uses.

Table 5.1: Profile of Proposed Allocations

	No. of sites	Total land (ha)
Mixed-use allocations	8	92.18
Strategic mixed-use allocations	1	63.30
Employment allocations	8	62.66
Total	**17**	**218.14**

Source: Central Lancashire authorities; Turley analysis

5.2 Figure 5.1 shows that the largest of the proposed allocations, specifically Preston West – covered at Policy SS5 – would offer circa 63.3ha of employment land[75]. While this is some 27% more than offered by Cuerden, as the next largest allocation – and over twice the size of the rest – it notably remains smaller than several of the sites allocated through the existing Core Strategy in 2012. The Samlesbury Enterprise Zone is believed for example to have then offered some 72ha of land, around 14% more than the largest allocation now proposed, and a further 65ha of land is also believed to have been available at Cuerden[76]. This calls into question whether the Central Lancashire authorities are truly answering LCCA's call – noted in section 3 – for a new generation of strategic sites for 2035 and beyond, or providing the larger sites that are known to be more attractive to global investors[77].

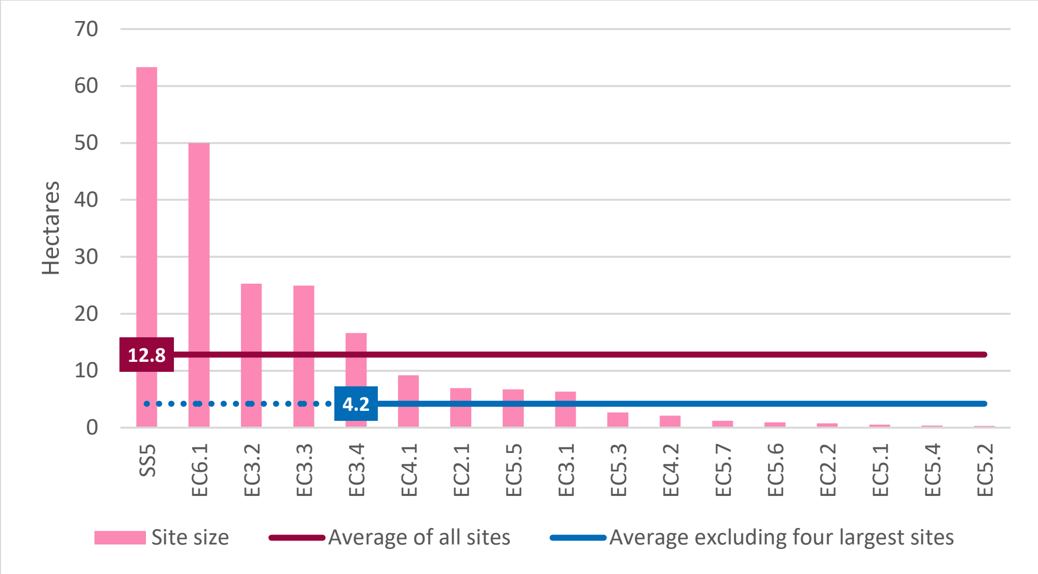
5.3 The employment sites proposed to be allocated now are circa 12.8ha in size, on average, but this is arguably skewed by the four largest sites since the others are typically less than a third as large averaging only 4.2ha. Eight sites, or nearly half of all proposed allocations, are smaller still.

[75] Preston City Council, Chorley Council and South Ribble Borough Council (February 2025) Central Lancashire Local Plan 2023-2041, Policy SS5

[76] BE Group (February 2022) Central Lancashire – Employment Land Study Update, paragraph 5.28

[77] Lancashire Combined County Authority (February 2025) The Lancashire Growth Plan 2025 – 2035, consultation version, p32

Figure 5.1: Size of Proposed Allocations



Source: Central Lancashire authorities; Turley analysis

5.4 The draft Local Plan also provides an indication of the uses that could come forward on each site. It suggests that all but one site would be suited to E(g) use, with the remaining 16 sites averaging 12.1ha in size. It is implied that general industrial development (B2) could come forward on 15 sites and warehousing (B8) on 13, but even if this was indeed a prospect – with B8RE disagreeing, as noted below – these tend to be only slightly larger on average at 14.4ha and 14.9ha respectively. Over half of the sites supposedly suited to these latter uses actually offer less than half as much land as these averages would otherwise suggest.

Table 5.2: Reported Suitability of Identified Sites to Various Uses

Ref	Site	Size (ha)	Suited to E(g)	Suited to B2	Suited to B8
SS5	Preston West	63.30	✓	✓	✓
EC6.1	Cuerden	50.00	✓	✓	✓
EC3.2	Preston East Junction 31A M6	25.31	×	✓	✓
EC3.3	11 Roman Road Farm	24.94	✓	✓	✓
EC3.4	Riversway, Maritime Way, Preston	16.60	✓	✓	×
EC4.1	Land north of Lancashire Business Park	9.20	✓	✓	✓
EC2.1	Land east of M61, Chorley	6.92	✓	✓	✓
EC5.5	Botany Bay/Great Knowley, Blackburn Road	6.70	✓	✓	✓
EC3.1	Former Alstom Works and Wider Site	6.35	✓	✓	×
EC5.3	Land at Bagganley Lane, Chorley	2.65	✓	✓	✓

EC4.2	Land at Leyland Business Park, Farington	2.10	✓	✓	✓
EC5.7	South of The Green and Langton Brow, Eccleston	1.19	✓	✓	✓
EC5.6	Woodlands, Southport Road, Chorley	0.90	✓	×	×
EC2.2	Former Gas Works, Bengal Street, Chorley	0.76	✓	×	×
EC5.1	Southern Commercial, Buckshaw Village	0.54	✓	✓	✓
EC5.4	Land adjacent to Northgate Drive, Chorley	0.38	✓	✓	✓
EC5.2	Cowling Farm, Chorley	0.30	✓	✓	✓
	Sites suited to use		**16**	**15**	**13**
	Average size (ha)		12.1	14.4	14.9

Source: Central Lancashire authorities; Turley analysis

5.5 As noted above, B8RE have concerns about whether industrial development could indeed come forward on sites claimed to be suited to such use. Their report at **Appendix 1** notes that much of the identified space will not be suitable for industrial occupiers due to its location. Many of the sites proposed to be allocated are observed as being in close proximity to residential areas, meaning they would likely have restrictions – around noise and operating hours, for example – that would no longer be tolerated by end users that increasingly operate 24/7. Several of the sites are also noted as being far from motorway junctions, bringing a risk of congestion issues and thus harming appeal to the wider industrial market.

5.6 B8RE also note specific issues at several of the individual sites proposed to be allocated. Land at Roman Road Farm, for instance, is acknowledged to have been partly presold following the granting of planning permission, but external funding is likely to be required to bring forward the remaining 20ha of this 24ha site creating uncertainty as to when this would actually become available to occupiers. Part of the sizeable Cuerden site is also believed to have been acquired, with talks ongoing around the acquisition of a further parcel, such that the remaining supply is believed to be closer to 35ha than 50ha. These concerns alone raise doubts about 35ha, or roughly a sixth (16%) of the reported employment land supply.

Summary

5.7 The R19 LP proposes to allocate 17 sites that would collectively provide around 218ha of employment land. Each offer only 12.8ha on average but this is arguably skewed by the four largest sites, since the average falls by over two thirds when they are excluded and nearly half of them all are even smaller still.

5.8 Even the largest sites are smaller than several of those that were allocated by the existing Core Strategy, in a sign that the Councils have failed to respond to the LCCA's explicit identification of the need for a new generation of large strategic sites, to both support its growth ambitions and capitalise on planned investment.

5.9 The Councils also appear to have exaggerated the number of sites suited to industrial use. Having reviewed the identified supply, B8RE believe that most would in fact not be attractive to such occupiers, due for instance to the likely restrictions that would be in place due to the proximity of several to residential areas. Several are also far from motorway junctions, threatening congestion.

5.10 B8RE have also identified specific issues with a number of the sites proposed to be allocated. Cuerden is the second largest, reportedly offering around 50ha of land, but B8RE believe that the remaining supply is actually closer to 35ha following confirmed and proposed acquisitions of the wider site. The fourth largest of the proposed allocations, at Roman Road Farm, is separately believed to be largely reliant on external funding such that there is uncertainty around when all but 4ha of this 24ha site could actually come forwards to meet needs. These concerns alone raise doubts about 35ha, or roughly a sixth of the employment land supply claimed by the Councils. Where these sites were omitted the claimed supply would be a little over 180 ha and much closer to the need claimed in the ELS, notwithstanding the concerns raised in the previous section that this serves to underestimate the full need.

6. Conclusion

6.1 This report – produced on behalf of Story Homes in support of their plans for Cuerdale Garden Village – has reviewed the proposed approach towards employment land provision in the emerging Central Lancashire Local Plan, currently out for consultation.

6.2 It has revealed **a likely underestimation of the need for employment land**, with the draft Local Plan citing an updated Employment Land Study – completed in February 2025 – in claiming that only 173ha is needed between 2023 and 2041. This is some 36% below the need reported during the previous consultation, when calculating an annual average to account for the extended plan period.

6.3 The Councils anticipate the greatest need being for industrial and warehousing land, with this having been estimated based on historic take-up between 2010 and 2023 plus allowances for healthier vacancy rates and the replacement of losses, in addition to a buffer. There is reported to be a substantially smaller need for offices, with this having been based on an unadjusted forecast that makes '*no allowance for major public policy interventions*' like the new headquarters of the NCF – blamed on uncertainty regarding associated job creation – but does attempt to allow for greater homeworking, before applying its own buffer.

6.4 This report has shown each of these methods to have limitations. The extrapolation of take-up since 2010, to estimate the need for industrial and warehousing land, wholly fails to account for the fact that almost four times as much employment land was intended to be developed over the same period, with the existing Core Strategy having set an overall target nearly three times larger than now proposed (454/173ha). Extrapolating the recent trend threatens to simply sustain what the industry perceives to be a chronic undersupply, and this is not rectified even by the various adjustments subsequently made – nor the use of a different approach for offices – given that the resulting annual need is only 1% above the recent trend. There is consequently an inherent assumption that the rate of development will not increase, contrary to the ambitions of a Government that is expressly focused on delivering economic growth to improve lives and address regional inequalities. The newly-established LCCA is also embracing this national agenda and aiming to build upon existing strengths, recognising the importance of infrastructure and site availability.

6.5 The need for land suited to offices – calculated using a different approach that is weakly justified and unusually based on a single forecast, rather than a range – also appears to have been underestimated. This is because:

- A fundamental error has been made in converting the underlying forecast into full-time equivalent jobs, with part-time roles having seemingly been excluded rather than converted into FTE as is common in similar studies;

- An excessive allowance has been made for people working only from home, ultimately but inexplicably assuming that this will continue at the rate recorded in the depths of the pandemic when national evidence suggests that the tendency to do so has since more than halved; and

- The forecast could and should have been adjusted to allow for strategic projects like the NCF, with newly available estimates suggesting that this investment alone could bring around 2,500 extra workers to Central Lancashire even if only some spin-off activities are retained in the area.

6.6 The likely underestimation of need raises **considerable doubt around whether an employment land supply totalling around 218ha will indeed be sufficient, as the Councils claim.** The identified sites also have limitations, particularly in terms of size since even the largest is smaller than several of the strategic sites allocated through the existing Core Strategy. The proposed allocations each offer only 12.8ha on average, but this falls by over two thirds to only 4.2ha when the four largest sites are excluded and nearly half of them all are smaller still. Contrary to the Councils' claims few of the sites appear suited to industrial use, according to agents B8RE, owing for instance to the likely restrictions arising from the proximity of many to residential areas and the distance from several to motorway junctions. Further concerns have also been raised about two sites, with Roman Road Farm noted as being reliant on external funding and Cuerden having already been partly acquired, and these alone raise doubts about 35ha or roughly a sixth of the employment land supply claimed by the Councils.

6.7 Beyond a likely shortfall of need the profile of allocated land **fails to respond to the LCCA's explicit identification of a need for a new generation of large strategic sites to be planned for to realise its economic growth ambitions** and capitalise on planned investment, including but not limited to the NCF. Given its location at the heart of the arc of growth in Lancashire, and the concentration of investment in the growth sectors in the cyber and defence sectors within Central Lancashire, this omission represents a significant failure to plan positively and support the needs of the modern economy, as required explicitly by the NPPF (paragraphs 85 and 86).

6.8 With the proposed supply appearing insufficient to meet a need that is almost certainly greater than claimed, there is clearly **an important role for Cuerdale Garden Village** where it is proposed to deliver a range of quality employment space on the A59 Growth Corridor, close to the NCF which is coming forward in the nearby Samlesbury Enterprise Zone. This means that it can not only meet the requirements of local businesses but also attract complementary investment, taking what is a unique opportunity to create a new cluster of businesses, academics and others operating in the cyber security and defence sectors[78]. It can also help to realise ambitions around advanced engineering and manufacturing, with the LCCA aiming to further support the strong and resilient supply chain of innovative businesses that has developed and diversified in recent years[79]. B8RE anticipate that the site will prove attractive to a wide range of occupiers, including national occupiers attracted by its excellent location and proximity to both the NCF and BAE Systems.

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[78] As referenced in section 2 'UK Security' is identified in the Lancashire Growth Plan as the first priority sector with the unique potential to create such clusters identified as being particularly integral to realising the county's growth potential in this field

[79] Lancashire Combined County Authority (February 2025) The Lancashire Growth Plan 2025 – 2035. Consultation Version, p8

Appendix 1: B8 Real Estate Market Insights Report

B8 REAL ESTATE

www.b8re.com

Market Insights report

For

In relation to

Cuerdale Garden Village,

Samlesbury

Lancashire

Prepared by B8 Real Estate

April 2025

1. INTRODUCTION

B8 Real Estate (B8RE) have been instructed to provide our industrial market knowledge on behalf of Story Homes, supporting discussions regarding employment land in the emerging Central Lancashire local plan.

This report provides up to date industrial property market commentary in relation to employment land and market needs for development within the A59 Growth Corridor, adjacent to Junction 31 of the M6 motorway, known as Cuerdale Garden Village.

In providing commentary, B8 Real Estate is a niche Warrington based practice specialising in the disposal and acquisition of industrial properties, sites, investments and general strategic property development advice across the North West regions.

We have over 20 years of experience in the sector and are regarded as the leading niche consultancy practice in the North West. As a practice we are currently advising on over 500,000 sq m stock and over 300 hectares of land across the region. As an agency, we are consistently ranked No 1 by Costar and EG the last 7 years as the most active agent in the region.

2. THE SITE

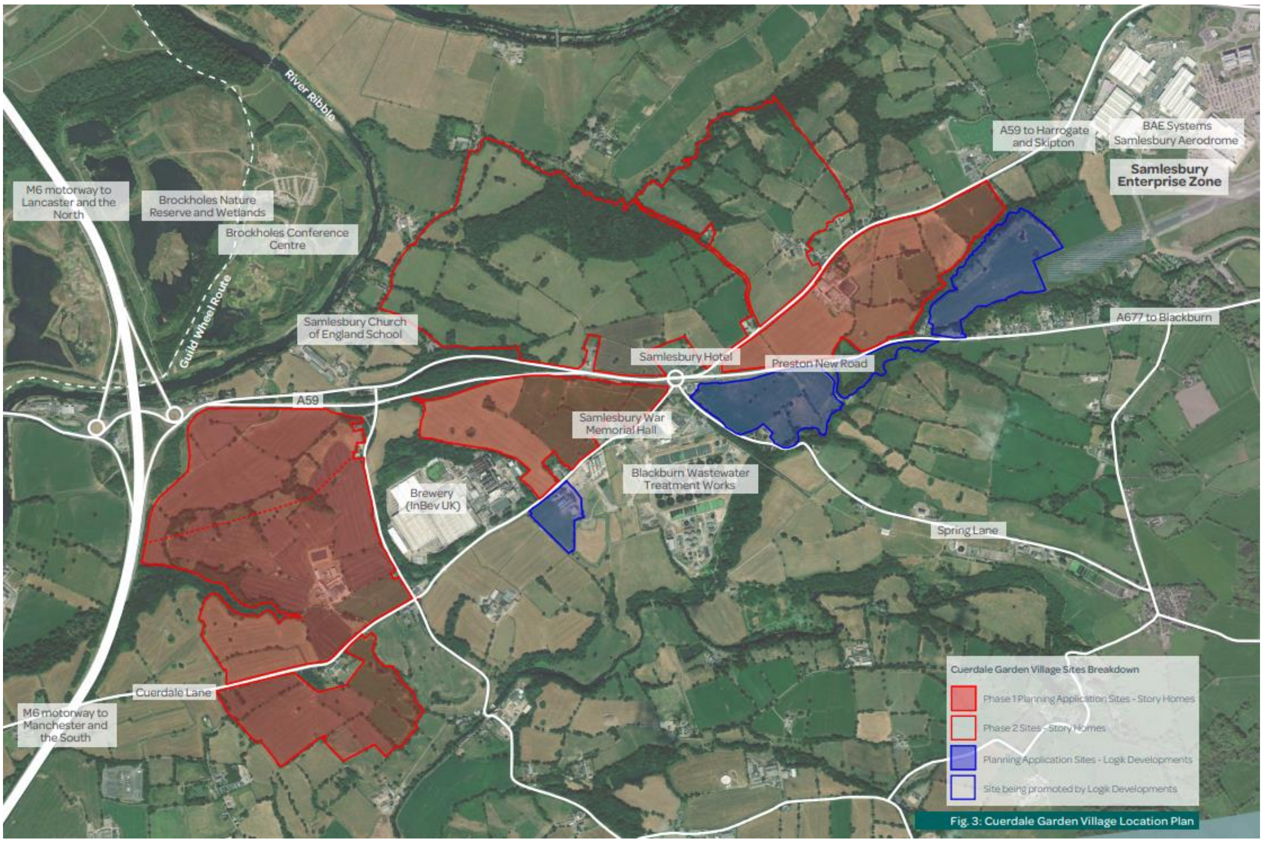

Fig. 3: Cuerdale Garden Village Location Plan

The site comprises 284ha of land positioned along the A59, leading to Preston city centre to the West and the Ribble Valley and Blackburn town centre to the East. The land benefits from immediate access to Junction 31 of the M6 motorway providing excellent connectivity to the rest of the region and national motorway network.

The employment site of Budweiser’s bottling plant is positioned in the middle of the proposed development and BAE systems’ significant aerospace operation sits to the East with the under construction National Cyber Force (NCF) Campus within the Samlesbury Enterprise Zone.

Phase 1 (subject to planning application ref. 07/2022/00451/OUT) of the proposed site comprises 5 parcels of land with proposed commercial development totaling 88.16 hectares / 164,000 sq m of development space.

Cuerdale Garden Village in totality provides for up to 429,500sqm of employment floorspace, 2,300 dwellings, a range of public amenities and extensive open space.

3. THE MARKET

3.1 North West Market Overview

Notwithstanding the current economic conditions and knock-on effects of Covid 19, the industrial and logistics sector has been extremely buoyant post pandemic as there has been a change in consumer habits, fueled by the rise of e-commerce through the trend of shopping online. This, along with Brexit has lead to an increase in companies 'onshoring' the storage of more products in the UK as a defensive position against worldwide supply chain issues.

Across all size ranges there has been strength and depth of demand which has reflected in several successive years of record take up of industrial space. However, despite continued rental growth, occupier demand has been cut back over the last 12 – 18 months, albeit still ahead of the rolling 5-year average. This drop has been influenced by factors in the wider macro-economic environment such as the inflationary cost of living crisis, rising interest rates and fears of a potential recession.

Despite the scale back in overall take up, supply of good quality industrial units remains low, particularly in the North West. What has been apparent is occupiers need and desire to take more modern space and for buildings to be functionally more sustainable complying with the Environmental, Social and Governance (ESG) requirements of businesses, as well as improving staff facilities. This combined with the expected EPC regulations, requiring a minimum rating of 'B' by 2030 is having a major impact on existing stock, occupier and investor perspectives and increasing the need for more development.

Occupiers requirements are now influenced by a number of technological factors as their buildings are now becoming more sophisticated leading to more bespoke requirements as handling systems are improving and consumer habits for quicker delivery times increases. This has led to a change in demand for e-commerce fulfillment, requiring buildings to be more strategically placed in 'last mile' locations near to urban areas, yet also have excellent connectivity routes to the motorway network as internet sales continue to increase leading to supply chain issues for some. Recent take up of big box demand (8,300 sqm +) demonstrates this need, with 68% of all big box demand over the last 24 months in the North West either new build or Grade A modern space.

Central Lancashire Industrial and Logistics Market

The Lancashire industrial market, attracts a wide range of local, regional and national occupiers due to its location being strategically attractive, benefitting from excellent accessibility to the national motorway via the M6 motorway and relative close proximity to Manchester & Liverpool, neighbouring Cumbria and also within easy reach of Scotland.

Known for its industrial heritage there remains a number of sizeable occupiers in Lancashire. This includes a large cluster of manufacturing users, most notably BAE Systems employing approximately 3,000 people.

The subject site sits in Central Lancashire, which for the purposes of this report is an area defined as a sub-region of the North West categorised as from Junction 26 of the M6 motorway at Wigan through to Junction 31A at Preston, encompassing Chorley & Leyland & Blackburn. The main conurbation is the city of Preston.

It is widely accepted that there lies a chronic shortage of new build space and 'oven ready' development sites within Central Lancashire . Where new build development has taken place in the sub-region, it has proven extremely popular, including one of the largest speculative developments in the North West. Notable new build industrial and warehouse schemes developed in the last 5 years within Central Lancashire include;

- Farington Park, Leyland – 50,539 sq m speculative new build warehouse, let to Victorian Plumbing in January 2023 ahead of practical completion. This was one of the largest lettings in the North West over the last 10 years. Developed by Caddick Developments / Canmoor.

- Preston East -a 20,717 sq m scheme located just off J31A of the M6 motorway. The 7ha site included a fully let terrace of units with purpose-built facilities for DHL and DPD pre-let ahead of practical completion. Developed by Henry Boot / Barnfield.

- Botany Bay, Chorley – a 8.5ha site with development comprising units from 120 sq m to 14,679 sq m. The scheme achieved a letting to Donaldsons Timber ahead of practical completion. A local occupier re-locating from just two miles away. The larger unit of 14,678 sq m remains vacant albeit it is shell specification with aspirational quoting figures on par with the North West's prime industrial location, Trafford Park. Developed by FI Real Estate.

- Frontier Park, Blackburn – a 36ha site developed in Blackburn in 2021. A phased development with units ranging from 15,000 sq ft up to 200,000 sq ft. The scheme was fully let no later than 12 months each building practically complete. Notable occupiers include, Staci, Fagan & Whalley and Science in Sport (SIS) and all have HQ's in the area.

As evidenced above, the last 5 years of development has proven to be hugely successful, demonstrating pent up demand and occupiers' need for better / more modern space across a range of sized units. The above highlights a number of significant occupiers already residing in Lancashire and whilst a number of deals were to national occupiers, the majority represented businesses that were already established in Lancashire / Central Lancashire. This shows the importance of the area in meeting sub-regional market demand and retaining facilitating businesses to grow as their requirements change.

Despite proven levels of demand at present there are only two new known new build units above 3,000 sq m in this area (Botany Bay, Chorley & Prime Point, Lower Darwen) and both are likely to be let within 12 months. Whilst there are a handful of schemes working towards getting their sites 'oven ready', given challenges in the macroeconomic market, we do not expect any new build development to take place in the next 12 months as a number of the strategic sites in the area either require external funding or will only develop out to lease buildings as opposed to freehold sales. This will result in a number of established occupiers in the sub-region start to look outside of the area as requirements for modern space for either expansion or efficiencies becomes essential.

Unsatisfied property requirements

B8RE are aware of a number of large unsatisfied property requirements in the market, specific to the Central Lancashire area that we believe would strongly consider Cuerdale Garden Village should the site have consent. These include;

Company	Size (sq m)	Comments
James Hall Ltd (Spar)	20,000 – 25,000	Looking for additional space in close proximity to Junction 31A of the M6. Ongoing unsatisifeid requirement specific to the area
Amazon	15,000 – 25,000	Actively looking for a purpose-built fulfilment centre with a low site coverage specific to central Lancashire to serve the surrounding towns. Considering alternatives.
Booths	24,000	Looking to become more efficient operationally and require a purpose built cross docked facility. Located close to Junction 31A
BAE Systems	40,000	Immediate requirement for storage of parts. Their requirement can be taken across several buildings to facilitate ongoing work. Proximity to Samlesbury would be highly attractive albeit with no options currently available. They are considering alternative locations in the North West

Tetrad	7,000	Furnishings business looking to consolidate and acquire more efficient space.
BM Steel	5,000	Centrally based in Preston and looking to relocate. Unable to find suitable location, albeit want to stay in local area.
BS Stainless	5,000	Large provider of stainless steel based at Walton Summit. Actively looking for a freehold purchase.

The above list of requirements provides a snapshot of known companies who have active requirements in the Central Lancashire area. Occupiers such as BAE systems cannot find anything suitable in the immediate area so are being forced to look at alternative options in the Northwest and are expected to acquire space outside the Central Lancashire area. This was the case for the business last year, looking to be close to their existing operations either in Barrow in Furness or Preston. Instead they chose to locate to Bessemer Park in Sheffield a scheme sitting within Sheffield City Regions ' Advanced Manufacturing Innovation' District.

Other Local Market Drivers

Outside of traditional local / sub-regional market demand and the sector trends driving the sustained demand for industrial and logistics floorspace referenced above in the region, we are aware that Central Lancashire has successfully attracted significant national investment in the form of the National Cyber Force (NCF) headquarters within Samlesbury Enterprise Zone. In cross reference to JLL's research report on Advanced Manufacturing, Cyber, & security, we understand this will create a high degree of interest in the locality and provides the potential to generate new national occupier demands in related sectors such as technology companies attracting high skilled jobs to the area. Such demand would be additional to the above market trends and place further pressure on the local commercial market to meet the need of the once in generation opportunity to significantly boost the economic growth.

Supply of Employment Land

The current draft plan identifies circa 218.14 ha of supply of employment land in Central Lancashire. Having reviewed the identified parcels of land, much of the space identified in our expert opinion would not be suitable for industrial occupiers due to its location. A lot of the allocated sites are in close proximity to residential areas and likely to have restrictions such as a noise and hour of uses implemented. This is now unsuitable to most distribution end users, requiring 24/7 use as well as manufacturing occupiers on shift patterns.

A long with this, some sites aren't located nearby to motorways causing congestion issues and these factors are unlikely to appeal to the wider industrial market. A number of identified sites are as follows;

Chorley

- Woodlands Conference Centre, Southport Road, Chorley – 1.55 HA of employment is deemed unsuitable for industrial, due to Parklands High School opposite and congestion this will likely cause.

Preston

- Alstroms, Strand Road – 3.18 HA of employment land identified is centrally located in Preston and surrounded by out of town retail and residential dwellings.

Leyland

- Moss Side Test Track, Leyland – 5.7HA of employment land identified is in very close proximity to new build residential homes and industrial development over 1,000 sq m is unlikely to appeal to occupiers.

- Farington Moss, Land at Lodge Lane – 11.84HA of employment land identified sits in close proximity to new build residential

B8RE however refer to the following large-scale employment sites that we have good working knowledge on and in our opinion are more suitable for industrial development. In doing so it is our market view that as a result of the high and suppressed demand observed above, along with take-up by non-traditional business uses, that whilst they represent deliverable supply they are either sites that require external funding, meaning they are unlikely to be developed out in today's market or are expected to be quickly absorbed, presenting a risk that the identified supply will be quickly eroded where demand will be sustained and continue to grow. They are as follows;

Roman Road, Farm (**Known as 'Aptus')** – totalling 24.94 ha, a joint development between Henry Boot & Barnfield Construction named Aptus. The scheme has planning and is capable of delivering 80,000 sq m. 4 ha of land has been pre-sold to tile and flooring solutions manufacturer Kerakoll, relocating from their nearby facility in Leyland. As part of the sale, the partnership is setting about delivering infrastructure and enabling works, making the site oven ready. External funding is expected to be required to bring further development for the remaining 20 ha meaning there is uncertainty when any additional industrial / logistics space will come to the market for occupiers.

Samlesbury Enterprise Zone – totaling 35 ha, it is expected that much of the designated employment land will be linked with the NCF agency in Samlesbury in an attempt to harness the benefits of the facility. With funding through Lancashire county council , a 2,500 sq m innovation hub to aid research and development linked to cyber security is to be built already absorbing immediately available supply. We expect this site to attract other businesses linked to cyber security with an advanced manufacturing research center also located here, and a range of mixed commercial, meaning little land could be left available for industrial / logistics.

Cuerden Strategic Site, Preston 'Lancashire Central' – totaling 50ha, the site now has outline planning consent and infrastructure / enabling works are taking place later this year (2025). Approximately 9ha of zoned employment land has recently been acquired by the NHS and a confidential retail occupier is in detailed discussions to acquire a circa 3ha of the northern part of the site. Already, the actual available supply at the site is approximately 35 ha and whilst the site has had many false starts, B8RE believe the remainder of the employment land shall be absorbed in the next 3 – 5 years.

In relation to employment land that we expected to be delivered in the next 24 months, is Junction 31A of the M6 / Roman Road Farm recently acquired by Monte Developments, the developer for both Frontier Park, Burnley and Blackburn. Totaling 25.31 ha, plans are being drawn up for up to 9,000 sq m of industrial development and we envisage planning consent to be submitted this year with meaningful conversations with occupiers already taking place. With funding readily available for development here, the unit sizes in the masterplan are expected to eclipse what can be built at Cuerdale Garden Village, meaning the sites will compliment each other and allow businesses from the nearby areas to expand or relocate across the majority of size ranges in the market.

Conclusion

Cuerdale Garden Village offers an opportunity to bring forward much needed employment space in Central Lancashire. The Central Lancashire area suffers from a chronic lack of modern / new build supply meaning occupiers are increasingly struggling to find suitable properties, having to widen their search, move out of the area, or simply put plans on hold.

It is our opinion that Cuerdale Garden Village shall appeal to a wide range of occupier requirements ranging from 1,500 sq m, targeting local occupiers up to 27,750 sq m harnessing interest from national occupiers due to the excellent connectivity and whilst there are a number of identified employment sites in the local plan, the amount of hectares available for industrial occupiers is less due to either unsuitable locations or occupier demand already acquiring space in the designated zones, absorbing availability.

Cuerdale offers a site directly off the M6 motorway that will appeal to most occupiers and the land shall compliment the NCF and BAE systems both in the immediate vicinity, promoting growth and additional jobs.

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