

Central Lancashire Local Plan

Examination Hearing Statement for Blackburn with Darwen Borough Council
Representor ID: D03

Matter 2: Vision & Objectives, Spatial Strategy & Location of New Development,
and the Site Selection Process.

November 2025

Our Ref: /25-03115



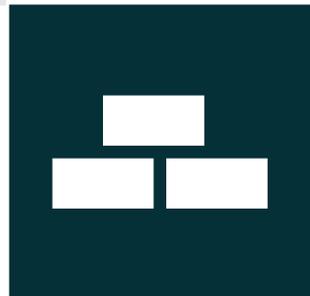
Contents

1 INTRODUCTION 3

2 RESPONSE TO THE INSPECTORS' QUESTIONS ON MATTER 2: VISION & OBJECTIVES,
SPATIAL STRATEGY & LOCATION OF NEW DEVELOPMENT, AND THE SITE SELECTION
PROCESS..... 5

Appendices

Appendix 1 MHCLG letter to the Planning Inspectorate 9th October
2025



Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

Created by: Tim Coleby BA (Hons), MRTPI

[Redacted]

Bernard Greep BA (Hons) BTP MRTPI

[Redacted]

Signature:

[Redacted Signature]

[Redacted] 06:00 GMT)

Checked by: Bernard Greep BA (Hons) BTP MRTPI

[Redacted]

Signature:

/

[Redacted]

eeep (Nov 6, 2025 15:07:53 GMT)

1 INTRODUCTION

1.1 Context

1.1.1 Rapleys LLP has prepared this Examination Hearing Statement on behalf of Blackburn with Darwen Borough Council ('the Council') in its twin roles as a neighbouring local planning authority and as the owner of a significant parcel of Green Belt land within the borough of South Ribble ('the land' or 'the subject land'). As context for our responses to the MiQs, the following brief summaries of the subject land and our Regulation 19 response are relevant and intended to aid understanding of this Statement.

1.2 The Subject Land

1.2.1 The land is located within the A59 corridor running east from J31 of the M6 motorway and adjacent to the village of Mellor Brook. The land also adjoins Samlesbury Enterprise Zone and Innovation Hub and the BAE Systems Samlesbury operations site, which 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 soon to be the home of the National Cyber Force, a Government backed partnership between the MoD and GCHQ, with its £5bn HQ now under construction and expected to generate an estimated 3,120 direct and indirect jobs and a GVA contribution of £112.6 million (Lancashire Growth Plan 2025-2035, published in September 2025). This expansion is very significant and is likely to mean that Lancashire can leverage additional Government investment as a result. Furthermore, recent local press reports indicate that Lancashire County Council has recently agreed major funding for a new innovation hub within the Enterprise Zone, and the Samlesbury Enterprise Zone and Innovation Hub is identified within the Lancashire Growth Plan as one of 10 Anchor Sites (also referred to as 'transformational projects'), which will accelerate growth and deliver nationally significant outcomes.

1.2.2 The excellent relationship of the Samlesbury Enterprise Zone and the subject land to the east is depicted by Figure 2.1 of our Regulation 19 response (April 2025). For ease of reference, we reproduce that graphic below:



1.3 Our Regulation 19 Response

- 1.3.1 Our Regulation 19 response concluded that the draft Plan lacks ambition, in that it fails to adequately recognise the strategic importance, economic strengths, success in attracting investment and potential for further growth of the cyber corridor between Lancaster, Salmesbury and Manchester. The Plan does not provide for its housing and employment needs, it is unsound and should not proceed. Instead, 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 in locations to be determined following a Green Belt review which prioritises grey belt sites conforming with sustainable patterns of development, in accordance with paragraphs 145 to 149 of the NPPF. Such a Green Belt review, in circumstances like this, where development needs are not being met in full, would also be aligned with the recent advice to the Planning Inspectorate from the Minister for Housing and Planning, dated 9th October 2025 (a copy of this letter is provided within Appendix 1 to this statement).
- 1.3.2 Our response also provided evidence that the subject land constitutes grey belt and that, to help meet employment and housing needs generally and complement the economic strengths and growth potential of the Salmesbury economic cluster specifically, it would be a sustainable location for strategic, mixed-use development.

2 RESPONSE TO THE INSPECTORS' QUESTIONS ON MATTER 2: VISION & OBJECTIVES, SPATIAL STRATEGY & LOCATION OF NEW DEVELOPMENT, AND THE SITE SELECTION PROCESS

Issue 2 – Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

2.1 Question 2.1: Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2) supported by robust and up to date evidence and otherwise soundly based? In particular:

a) Does it reflect the vision and objectives of the Plan?

2.1.1 No. Key elements of the draft Plan's vision and objectives are to meet local housing needs and to provide a range of employment and economic growth opportunities, thereby promoting Central Lancashire as a key economic centre for the North West and strengthening economic prosperity.

2.1.2 The spatial strategy does not reflect the Plan's vision and objectives in these respects. It pays insufficient heed to the national political and planning imperative to stimulate and enable sustainable economic and housing growth. The draft Plan is not sufficiently ambitious to deliver against that imperative, because it does not:

- 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 strategy conflicts with paragraphs 11 a), 11 b), 20-23, 36, 61, 62, 69 and 85-87 of the NPPF; or
- 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 spatial strategy 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.

2.1.3 The Lancashire Growth Plan of September 2025 runs to 65 pages and so we do not cover it in detail here, but key extracts are highlighted below to illustrate just how important Samlesbury – which is mentioned in the document some 22 times – is to Lancashire. The first extract of note is Lancashire's 'Emerging Growth Corridor Map' (page 15 of the document), which shows that the Samlesbury Enterprise Zone is one of ten 'Anchor Sites' across Lancashire, also referred to in the document as 'transformational projects'. The plan, reproduced on the following page below, also shows the close proximity of Samlesbury to the 'Blackburn Growth Axis' – identified as another of Lancashire's Anchor Sites – and the excellent relationship of both to the County's main economic corridor, running from Blackpool to east Lancashire.

2.1.4 Other key points that we wish to highlight from the Lancashire Growth Plan are as follows:

- Page 15 states: *'Lancashire's Growth Plan focuses on enhancing economic connectivity through key clusters and corridors. Central to this strategy is the Central Belt along the M55–M65 corridor, encompassing major employment zones and innovation assets in Blackpool, Preston, Blackburn, and Burnley. The emerging North–South Cyber Corridor further strengthens this area, linking Lancaster, Samlesbury, and Manchester.'* Thus, Samlesbury is strategically positioned in relation to both the east-west and north-south corridors.
- Page 32, under the heading 'Transformational Projects', says this: *'Samlesbury Enterprise Zone and Innovation Hub: Adjacent to BAE Systems and home to the AMRC North West, this site supports advanced engineering, manufacturing, cyber, and robotics. It anchors a wider innovation ecosystem, including the National Cyber Force and regional cyber clusters.'*
- Page 55, under the heading 'Innovation and Research', describes the north-south Cyber Corridor as follows: *'Lancashire's investment in cyber, digital, and AI is also benefiting the Creative Industries. Inclusive skills pipelines, tech-enabled infrastructure, and cross-sector innovation are helping to build new creative clusters and digital production hubs. The Lancaster–Samlesbury–Manchester corridor, Blackburn Cyber Campus, and Silicon Sands in Blackpool are key locations supporting artistic innovation and talent retention.'*

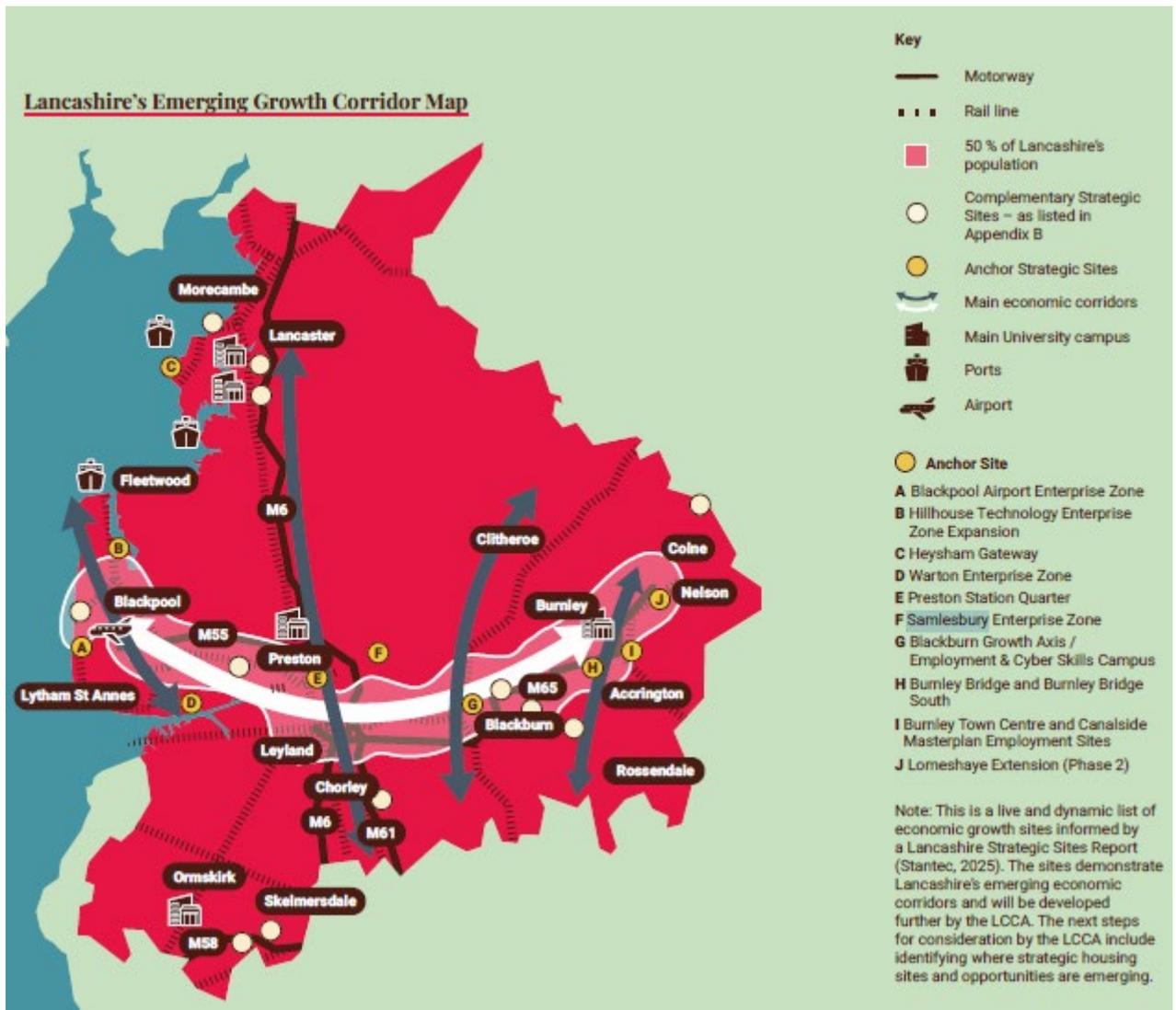
- Page 98 describes the Samlesbury Enterprise Zone and Innovation Zone in detail:

'A site of international significance, Samlesbury Enterprise Zone can enable transformational economic growth for the whole of Lancashire. Designed to support advanced engineering and manufacturing, hi-tech and research-led sectors, including cyber and robotics, 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 adjacent to BAE Systems and accommodates the Advanced Manufacturing Research Centre North West (AMRC NW).

The site is ready for development and has undergone significant remediation and plot preparation, unlocked through the provision of utilities and a dedicated spine road.

The location of the National Cyber Force in the Samlesbury area 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 growing tech sector potential by being 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.'



b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?

2.1.5 The Plan's distribution of development is related to the settlement hierarchy in Table 1, but please refer to our response below to question 2.2, setting out our concerns regarding the settlement hierarchy.

c) Is the focus on the larger urban settlements justified and soundly based?

2.1.6 This focus is not justified or soundly based in the case of this Plan because it means that housing and employment needs are not met in full. The Plan relies substantially for its housing and employment delivery on strategic and mixed-use urban sites and regeneration of brownfield sites, particularly in Preston city centre. These sites are often characterised by significant challenges and substantial costs involved in remediation and/or major infrastructure provision and they tend to be located where market demand and land values are lower, impacting on viability. As a result, the delivery of housing or employment development at some of these sites over the Plan period is therefore likely to be delayed or slower than predicted by the Plan, as we show in our responses on Matter 4.

2.1.7 This focus also means that the Plan's spatial strategy lacks flexibility, with the scale and extent of sustainable housing and employment growth opportunities elsewhere largely overlooked. In particular, the strategic economic importance and growth potential of the cyber corridor between Lancaster and Manchester, including the high value economic cluster centred on the Samlesbury Enterprise Zone, is not adequately recognised.

d) How were the proportions of development proposed for each settlement arrived at?

2.1.8 We have no specific comments, other than a general concern that development apportionment within the Plan pays insufficient regard to requirements to meet housing and employment needs in full and to distribute development where it can most sustainably complement existing economically strategic and successful locations, such as the Samlesbury Enterprise Zone. Instead, undue reliance is placed on strategic and mixed-use urban sites and regeneration of brownfield sites, particularly in Preston city centre, as explained above in our paragraph 2.1.4

e) Would it provide sufficient development within rural areas and other settlements?

2.1.9 See our responses to question 2.1d) above and 2.5 below.

f) Does the distribution of employment related development take appropriate account of national and regional programmes and strategies?

2.1.10 No. As already stated above, and in detail within our Regulation 19 response, the Plan lacks ambition and fails to maximise the economic potential of Central Lancashire arising from other relevant employment related programmes and strategies, as shown by the following examples.

2.1.11 The adopted Blackburn with Darwen Local Plan Core Policy 2 proposes a balanced growth strategy, setting out the concept of 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.

2.1.12 As we highlighted above, the recently established Lancashire Combined County Authority has published an ambitious Growth Plan, the foreword to which begins as follows:

'It's Lancashire's Time.

In a world of rapid change and renewed leadership this Growth Plan sets out a bold vision for Lancashire's future. It reaffirms our ambition, showcases our strengths, and highlights the unique role we can play in driving the UK's national growth mission..... Today, we are a dynamic, forward-looking economy with both national and international relevance. Our unique energy assets, growing investments in defence, security, and technology, and our ability to reinvent traditional industries position us as a powerhouse of innovation and resilience. A key driver of this strength is the clustering of our high-value industry sectors, which fosters collaboration, accelerates innovation, and enhances our appeal to inward investors. This Growth Plan aligns with the UK Government's Industrial Strategy, focusing on shared priorities: creating good jobs, boosting innovation, and growing the economy sustainably. Our strengths in advanced engineering and manufacturing, clean energy, digital technology, and artificial intelligence reflect national ambitions and help turn innovation into real-world impact... The Growth Plan sets out clear priorities for public and private investment, providing a roadmap to unlock Lancashire's

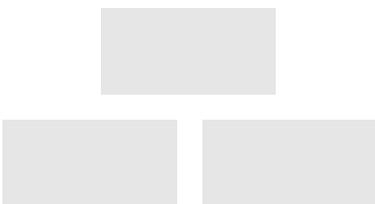
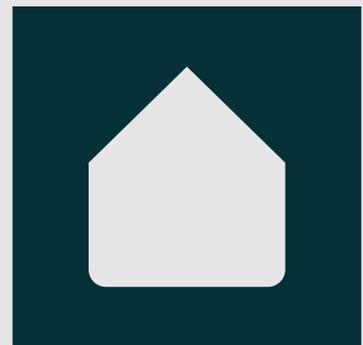
potential. It will guide how we target our own resources, improve local places, build new skills pathways, enhance connectivity, and create new opportunities for wealth and employment. The pipeline of projects identified in the Plan has the potential to attract over £20 billion in additional investment.'

- 2.1.13 The Growth Plan highlights 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 Salmesbury Enterprise Zone and adjoining land, where the National Cyber Force HQ is now under construction. The Growth Plan also highlights the need for housing growth in locations complementary to such economic growth clusters.
- 2.1.14 In these regards, we also note that the SoCG signed with Lancashire County Council (Examination document DC11) states as follows (our emphases added):
- '...the Central Lancashire area hosts significant sector strengths which have the potential to grow and develop new, nationally significant high-value capabilities in digital, cyber, technology, knowledge-based industries and advanced engineering and manufacturing. In order to realise these opportunities, site allocation and assembly is critical in providing a strategic pipeline to respond to demand';* and
- 'LCC believes that the Enterprise Zone in Salmesbury is likely to reach capacity early in the plan period and the future local plan will be supporting specialised sector growth and innovation in the medium to longer term.'*
- 2.1.15 These examples show that the absence of any additional employment allocations outside but closely related to the Salmesbury Enterprise Zone fails to take appropriate account of central government and county-wide support for further growth at Salmesbury and the cyber corridor as a whole.
- 2.2 Question 2.2: What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?**
- 2.2.1 The Plan's settlement hierarchy is essentially that which also formed part of the Central Lancashire Core Strategy, adopted in 2012 but originally drafted based on evidence gathered several years before that. The hierarchy therefore still relies on evidence and circumstances pertaining to the early part of the 21st century. In the case of Mellor Brook, its place at the lower end of the hierarchy was therefore set before the designation in 2011 of the Salmesbury Enterprise Zone, which has of course seen substantial and successful economic growth in the years since.
- 2.2.2 The hierarchy therefore does not adequately reflect current circumstances and the potential of some key locations beyond the main urban areas to accommodate significant levels of sustainable growth, especially within the above referenced cyber corridor.
- 2.2.3 The settlement hierarchy should incorporate flexibility to allow economic and associated residential growth outside existing settlement boundaries where it is demonstrably in accordance with sustainable patterns of development. For example, Mellor Brook and the adjoining high value economic cluster comprising the Salmesbury Enterprise Zone and the BAE Systems site constitute a particular form of sustainable settlement which warrants special consideration and a higher position within a revised settlement hierarchy.
- 2.3 Question 2.3: What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Integrated Assessment work?**
- 2.3.1 Whilst the Integrated Assessment is dated January 2025, following the publication of the revised NPPF in December 2024, and whilst it shows that various alternative spatial approaches were assessed, it is pertinent that none of these approaches included either:
- a strategy whereby the full housing needs of the plan area were met in full, measured using the standard method as described within the December 2024 version of the NPPF. This is symptomatic of the undue haste with which the Plan proceeded to its Regulation 19 stage between December 2024 and March 2025, simply in a bid to comply with the transitional arrangements set out within the NPPF; or
 - a strategy whereby the focus was to highlight the economic importance and job and wealth creation potential of the aforementioned cyber corridor, including the Blackburn Growth Axis,

with priority given to maximising development opportunities which adjoin and complement particularly successful economic locations, such as at Salmesbury.

- 2.4 Question 2.4: Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?**
- a) Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?
- b) Were constraints given relative weight in the site selection process? If so, how was this determined?
- c) In relation to flood risk, were sites at low risk preferred over those at greater risk? How did the Strategic Flood Risk Assessment (SFRA) inform site selection? Does the SFRA2 reflect the most up to date flood-mapping? Where sites are proposed for development in areas of flood risk, does the Plan take a sound approach in how these matters will be addressed?
- d) What account was taken of Best and Most Versatile Agricultural Land?
- 2.4.1 The identification of potential site allocations was done through the SHELAA, yet the evidence base document Ho16 'Site Selection Process' confirms that all Green Belt sites were discounted at the earliest stage of the SHELAA process, unless they were previously developed. For the reasons we explain elsewhere, we consider that the Plan should be paused to allow a Green Belt review to take place, so that sustainable grey belt sites can be identified to help meet the Plan area's local housing and employment needs in full.
- 2.4.2 Our other concern is that the selection of site allocations appears to have been supply-led, with all sites identified in the SHELAA as suitable, available and achievable subsequently being allocated. There is no evidence that sites were selected in accordance with an overarching strategy directing development in accordance with wider objectives for sustainable growth or based on where need exists or is likely to arise.
- 2.5 Question 2.5: Does the Plan allow sufficient development in rural local centres, smaller villages and hamlets, rural areas and settlements to comply with paragraph 83 of the Framework? Are the proposed settlement development boundaries up to date and are these appropriately drawn? What factors were taken into account in designating these?**
- 2.5.1 Our position, as described above, is that in respect of Mellor Brook and the adjoining high value economic cluster comprising the Salmesbury Enterprise Zone and the BAE Systems site, cumulatively they form a particular form of sustainable settlement which warrants special consideration and a higher position within a revised settlement hierarchy.
- 2.5.2 However, even if Mellor Brook remains as a 'smaller rural village' in the settlement hierarchy, it could still be identified for sustainable growth complementary to the economic cluster, and such growth would enhance the vitality of Mellor Brook and support thriving local services, fully in accordance with paragraph 83 of the NPPF.
- 2.6 Question 2.6: What are the Plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans?**
- 2.6.1 We have no comments in this regard.
- 2.7 Question 2.7: Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?**
- 2.7.1 We explained in our response to question 2.1c) above that the dis-proportionate focus on larger urban settlements means that the Plan's spatial strategy lacks flexibility, with the scale and extent of sustainable housing and employment growth opportunities elsewhere largely overlooked.
- 2.7.2 We do not propose modifications to any Plan policies. Instead, as we explain elsewhere, we consider that the Plan should be paused to allow a Green Belt review to take place, so that sustainable grey belt sites can be identified which would take advantage of key economic growth potential and help to meet the Plan area's local housing needs in full.

MHCLG Letter to the Planning Inspectorate 9th October 2025





Ministry of Housing,
Communities &
Local Government

Matthew Pennycook MP
Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

Paul Morrison
Chief Executive
The Planning Inspectorate

9 October 2025

Dear Paul,

As you know, this government is determined to make rapid progress toward universal local plan coverage. The plan-led approach is, and must remain, the cornerstone of our planning system. It is through local plans that communities can best shape decisions about how to deliver the housing and wider development their areas need. They also provide the necessary certainty and confidence for the sector to bring forward the development required across the country.

As you will know better than most, the current system of local plan making is too slow and cumbersome. That is why we are committed to introducing a new model of local plan development that enables better, shorter plans to be produced faster. We intend to publish the regulations and guidance that will underpin that model later this year and I know that you share my determination that the Planning Inspectorate work alongside and support local planning authorities to ensure good plans are put in place as efficiently as possible.

We have also been clear about the importance of effective strategic planning across local planning authority boundaries, both to support the effective distribution of housing across appropriate geographies and also provide high-level frameworks for infrastructure investment. I look forward to welcoming the development of Spatial Development Strategies across England following the passage of the Planning and Infrastructure Bill.

In advance of the new plan-making system and mechanisms for cross-boundary cooperation coming into force, the final set of local plans being delivered within the current system remain essential to facilitating the effective delivery of housing, jobs and infrastructure. It is therefore critical that Inspectors approach examinations of current system plans with the appropriate degree of flexibility. The evidencing of expectations to establish whether the legal and soundness tests have been met – including with respect to the Duty to Cooperate – should be proportionate to the context in which plans in the existing system are being prepared.

I very much welcome that in some cases Inspectors are already exercising a degree of flexibility to expedite adoption of local plans. For example, I note recent pragmatic decisions to proceed toward adoption in instances where a five-year housing land supply cannot be evidenced at the point of adoption but where the plan significantly boosts supply and still meets housing needs over the plan period or by providing additional opportunities to clarify compliance with the Duty to Cooperate. Relevant Planning Practice Guidance provides advice in respect of both of these

matters, and will no doubt be of ongoing assistance in assessing whether proportionate evidence has been provided or considering whether stepped housing requirements may be justified.

It remains important that we do not see the adoption of poor-quality plans, or accept overly long examinations (I am grateful for the action that Inspectors have taken following my letter of 30 July 2024 in that regard). However, within those bounds, where plans are capable of being made adoptable, I want Inspectors to seek to do so in the examination process.

Whilst it is the role of strategic policy-making authorities to decide to review Green Belt boundaries where they are unable to meet development needs, I am revoking the letter issued in March 2014 by the then Minister Nick Boles. This is to ensure PINS can fully play their part in helping to give local plans the best chance of being found sound. This provides PINS, where necessary, with the option to recommend as part of the examination that a Green Belt review is undertaken to consider whether additional sites could be identified, in line with national policy, to meet development needs.

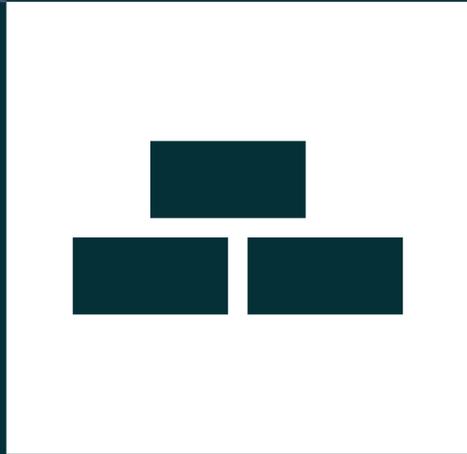
I was also pleased to learn that from October, the Planning Inspectorate is introducing a new pre-examination checklist process, including in relation to the Duty to Cooperate. This new approach, coupled with ongoing engagement with local planning authorities through Advisory Visits, should ensure that local plan examinations progress as smoothly as possible.

As ever, my sincere thanks to you and all the staff at the Inspectorate for all the work you are doing to support the government's ambitious programme of reform.

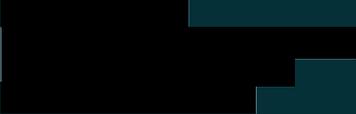
Best wishes,

A handwritten signature in black ink, appearing to read 'Matthew Pennycook', with a large, sweeping flourish at the end.

MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning



For further details contact:
Bernard Greep



Rapleys LLP is registered as a Limited Liability Partnership in England and Wales.
Registration No: OC308311. Registered Office at Unit 3a, The Incubator, The Boulevard,
Enterprise Campus, Alconbury Weald, Huntingdon, PE28 4XA. Regulated by RICS.