

## Central Lancashire Local Plan

Examination Hearing Statement for Blackburn with Darwen Borough Council  
Representor ID: D03  
Matter 3: The Housing Requirement

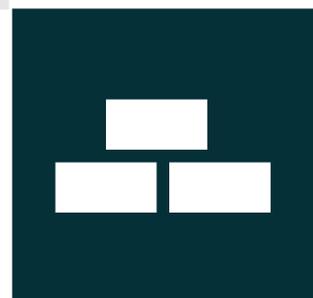
November 2025  
Our Ref: /25-03115



**Contents**

1 INTRODUCTION.....3

2 RESPONSE TO THE INSPECTORS' QUESTIONS ON MATTER 3: THE HOUSING REQUIREMENT.....4



## 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]

[\[Redacted\] 17:46 GMT](#)

**Checked by:** Bernard Greep BA (Hons) BTP MRTPI

[Redacted]

**Signature:**

/

[\[Redacted\] p \(Nov 6, 2025 15:21:40 GMT\)](#)

# 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 Please refer to our Matter 2 statement for further details regarding the Growth Plan.

## 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, Samlesbury 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 9<sup>th</sup> October 2025 (a copy of this letter is provided within Appendix 1 to our Matter 2 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 Samlesbury economic cluster specifically, it would be a sustainable location for strategic, mixed-use development.

## 2 RESPONSE TO THE INSPECTORS' QUESTIONS ON MATTER 3: THE HOUSING REQUIREMENT.

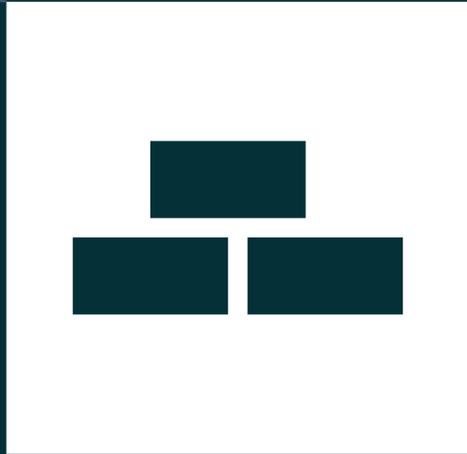
Policy HS1.

Issue 3 – Is the identified housing requirement justified and consistent with national policy?

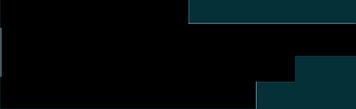
- 2.1 **Question 3.1: Is the housing requirement of 23,652 homes during the 2023 –2041 period (policy HS1) and a figure of 1,314 per annum (dpa), justified by the Council's evidence? Are the assumptions of the 2024 Housing and Economic Development Needs Assessments and Addenda (Doc HO10, HO11 and HO12) soundly based, particularly in relation to:**
- a) Identifying a baseline figure?
  - b) Forecasts for economic growth?
  - c) Alignment of jobs and workers?
  - d) Assumptions of housing requirements arising from economic growth?
- 2.1.1 The housing requirement of 23,652 homes is not justified by evidence or consistent with national policy. This requirement figure is based on an employment-led scenario used in the Central Lancashire Housing Land Study Update of December 2024 (Doc HO9, which itself takes account of the content of Docs HO10, 11 and 12 in respect of the three individual authorities) but it is notable that the figures derived from this scenario were then superseded by the revised standard method also published during the same month alongside the revised 2024 version of the NPPF.
- 2.1.2 The housing requirement figure is also flawed in that it reflects a total jobs growth forecast of 16,660 jobs across the Plan area, as provided by Cambridge Econometrics. However, an alternative Housing Needs Assessment dated April 2025 was submitted by Stantec Development Economics on behalf of a consortium (Story Homes, Persimmon Homes, Wain Homes, Taylor Wimpey and Northern Trust) at Regulation 19 stage (available on the examination website under representor ID A32.2 supp 1). This report identifies an alternative jobs growth figure produced by Oxford Economics which is much more optimistic, forecasting 26,550 additional jobs across the Plan area over the Plan period. This higher growth projection is more reflective of the economic growth potential described in the Lancashire Growth Plan, particularly in relation to Central Lancashire's location within the cyber corridor running between Lancaster and Manchester (as we explained in our response to Matter 2.)
- 2.1.3 Furthermore, neither of these forecasts, even the more optimistic one from Oxford Economics, include jobs growth associated with specific projects in the Plan area, such as the National Cyber Force HQ now under construction within Samlesbury Enterprise Zone, which the Lancashire Growth Plan (page 29) indicates could create 3,120 direct and indirect jobs at and related to the site. The Stantec report referenced above indicates that 1,500 of these jobs would be filled by people needing a home close to the Enterprise Zone.
- 2.1.4 In terms of the impact of increased jobs on the amount of housing required, the Stantec report estimates that:
- an additional 16,660 jobs (the Cambridge forecast) requires 16,335 additional dwellings, some 907 dpa over the Plan period;
  - an additional 26,550 jobs (the Oxford forecast) requires 26,032 additional dwellings, some 1,446 dpa over the Plan period; and
  - adding a further 1,500 workers needed to fill the jobs directly or indirectly created at the National Cyber Force HQ would result in a requirement for 27,555 additional dwellings, some 1,530 dpa over the Plan period.
- 2.1.5 The Plan currently proposes only 1,314 dpa, not nearly enough to accord with the ambitious job growth opportunities described above and therefore not justified or consistent with national policies to significantly boost housing growth and build a strong, competitive economy.
- 2.2 **Question 3.2: How were the housing requirements of each authority arrived at? Will the proposed requirements adequately address the needs of each authority? Is the Plan sufficiently clear in relation to how a failure to supply housing in one authority will impact upon the other two authorities in relation to five year housing land supply?**
- 2.2.1 The requirement figures are based on an employment-led scenario used in the Central Lancashire Housing Land Study Update of December 2024 but, as described above, this is now superseded by the standard method.
- 2.2.2 Furthermore, the stated housing requirement figure of 23,652 dwellings represents less than 80 per cent of the area's housing need, which is 29,934 dwellings (using the revised standard method

introduced in December 2024 and also taking account of the latest affordability ratios published in March 2025) over the Plan period – and if the Plan period is extended to 2042, as we consider it should be, the housing need is actually 31,597 dwellings, such that the Plan is only providing for 75 per cent of the objectively assessed need.

- 2.2.3 The Plan's housing provision strategy is clearly a response to the transitional arrangements, yet there is no evidence base to justify it – this mechanism of seeking to provide for 80 per cent of need has simply been used for expediency in the hope that the Plan is found to comply with paragraph 234a and thereby paragraph 235. Yet draft Policy HS1 conflicts with other parts of the NPPF, which confirm that the housing requirement figure set by the Plan should:
- meet local housing need in full and be considered as a minimum, as required by paragraphs 11 a), 11 b), 20-23, 36, 61, 62 and 69 of the NPPF. Indeed, we consider that there is actually justification for the housing requirement figure to exceed the identified housing need in Central Lancashire, as allowed for in paragraph 69 of the NPPF, because the Plan should positively reflect growth ambitions linked to economic development, as we described above; and
  - in accordance with paragraph 63 of the NPPF, reflect the size, type and tenure of housing needed for different groups in the community, including affordable housing and various forms of specialist housing.
- 2.2.4 The draft Plan's evidence base does not adequately demonstrate that even the lower housing requirement figure of 23,652 dwellings can be delivered over the Plan period. We consider that undue reliance is placed on all the Plan's housing allocations being implemented and completions achieved in accordance with the housing trajectories within Appendix 3 to the Plan. In our experience, at least some of the allocated sites will not come forward as planned or will be delayed such that completions are lower than expected, resulting in a shortfall of housing supply. In order to avoid such a shortfall from arising, which would have harmful consequences both for meeting housing need and for economic growth, the Plan should allocate sufficient additional housing sites, where they conform with sustainable patterns of development, to provide greater choice, flexibility and competition in the housing market.
- 2.3 **Question 3.3: In relation to Affordable Housing Needs, is the identified need for 438 dpa based on robust, up-to-date information? How has this been considered in the overall housing requirement?**
- 2.3.1 We have no comments on this question.
- 2.4 **Question 3.4: Does the requirement adequately recognise the impact of housing need arising from strategic employment allocations and regional growth strategies? What assumptions have been made in relation to this?**
- 2.4.1 No, it does not, for the reasons explained in response to question 3.2 above.
- 2.5 **Question 3.5: Does the figure take adequate account of the needs of elderly residents and specialist housing?**
- Question 3.6: Should there be a housing requirement for designated neighbourhood areas identified within the Plan (paragraph 66 in the NPPF Dec 2023)? If so, what should this be?**
- 2.5.1 We have no comments on these questions.



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.