

Central Lancashire Local Plan Examination - Matter 4 Hearing Statement

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Associated Reg 19 Submission Reference : ID A36 Neil Lucas

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Context

- 1.1 This Hearing Statement has been prepared on behalf of Logik Strategic Land Ltd ('Logik') in respect of the Examination in Public (EiP) of the draft Central Lancashire Local Plan (CLLP). It builds upon and should be read alongside Logik's representations submitted to the Regulation 19 consultation in April 2025.
- 1.2 Logik is an experienced strategic land promoter with over 50 years' experience in bringing forward high-quality development that delivers lasting economic and social benefits. Based in South Ribble, Logik has worked closely with South Ribble Borough Council ('SRBC') on several significant projects, including assisting with the delivery of the Lancashire County Cricket Club facilities.
- 1.3 In December 2022, Logik submitted an outline planning application (ref: 07/2023/00035/OUT) for the first phase of an employment-led development on land west of Samlesbury. At that time, it was in accordance with the principles of the emerging draft CLLP that identified a growth area around Salmesbury. In parallel, Logik has actively engaged in all stages of the emerging Local Plan process, including making detailed representations to the Preferred Options consultation in February 2023 and the subsequent Regulation 19 draft plan.
- 1.4 Logik's representations raised fundamental concerns regarding the soundness of the draft CLLP, particularly its reliance on a flawed and incomplete employment land evidence base, its failure to plan positively for economic growth, and its omission of a potential Strategic Site Allocation at Cuerdale. Logik maintains that the draft CLLP, as currently drafted, does not robustly identify or meet the area's objectively assessed employment needs, fails to consider the implications of the NCF development, and avoids necessary consideration of Green Belt release.
- 1.5 The purpose of this Hearing Statement is to assist the Inspectors by providing further clarification and evidence in support of Logik's position. It expands upon the matters previously raised in the Regulation 19 representations and sets out the justification for the inclusion of a Strategic Site Allocation at Cuerdale as a critical component of the region's economic strategy and employment land supply.

Q4.7/4.8 – What is an appropriate amount of employment land to be assumed within the plan period for Policy SS5 – Preston West.

- 1.6 The Publication Plan states that there will be supply of 63.3 hectares of employment land within the plan period at Site SS5.
- 1.7 The 63.3 hectares number is critically important in the context of the Plan's overall employment land policies – as it constitutes 37% of the stated employment land need of 173 hectares over the plan period¹. It is the biggest individual employment land allowance in the Plan.
- 1.8 We have two inter-related criticisms of Policy SS5:
 - First, the proportion of the site devoted to employment land uses is **too large**.

¹ In our Matter 8 submission we explain why this 173 hectare need figure is in fact too low.

- Second, the assumption on how much of any employment land allocation will be developed in the plan period is wholly **unrealistic**. The plan effectively assumes 100% of the employment land at SS5 is available within the plan period.

1.9 We deal with each of these in turn.

Overall Scale of Employment Land Allowance

1.10 Policy SS5 identifies capacity for 1,850 new dwellings, and up to 63.3 ha for employment uses within the site, which is based on an equal split on the developable area of the site between residential and employment uses. The 50/50 split does not fit with the stated ambition of Policy SS5 as “residential-led” and does not follow the advice in the Councils’ evidence base.

1.11 As recently as their February 2025 report the BE Group assessed this site as only a ‘maybe’ for inclusion in the Plan as an employment location². The site scored only 56 out of 100 in the BE Group’s assessment and was given scores of zero out of 10 on both the criteria relating to ‘constraint free’ and ‘available’.

1.12 The BE Group report of February 2025 says of the site (see pages 132/133):

- *“Although the land sits in a relatively strong location, there are a range of practical issues which would need to be addressed before an employment allocation could be considered”.*
- *“Any scheme is likely to be housing led and deliverability needs first to be considered in the context of residential uses firstly”.*
- *“It is also unclear if a full half of the site would realistically be brought forward for commercial uses in this mostly residential location”.*

1.13 In addition to the views of the BE Group, the joint promoters of SS5 (Harworth Estates) also believe the employment land allocation at SS5 should be reduced in scale. Harworth state in their representations (Rep ID A61) that:

- *“Harworth considers that the site is likely to be more suitable for residential development given its existing context, and that there is scope to increase the residential and reduce the commercial element of the policy” (para 4.8)*
- *“... the evidence base does not provide clear commercial rationale for proposing a 50/50 split, in terms of the site’s attractiveness for particular employment uses and whether there are any market-based demand factors driving this. This view is supported by the site analysis set out in the Central Lancashire Employment. Land Study – Land Supply and OAN Update 2024’ (para 4.9)*

1.14 It appears from the Councils’ responses to Reg 19 representations that the 50/50 land use split is purely indicative and it is only once a site masterplan is produced that the Councils feel they can alter this split.

1.15 We disagree with the position and believe the employment land allowance should be altered now to reflect the evidence the Councils have before them. No-one other than the Councils appears to be saying that 50% (63.3 hectares) is the right employment land proportion for the site.

1.16 If the Councils feel only able to work in indicative amounts then a share of two-thirds housing and one third employment land (42 hectares) would feel a more appropriate split³.

² Central Lancashire Employment Land Study – Land Supply and OAN Update 2024. Dated February 2025. BE Group.

³ Note : the overall developable site area for SS5 is shown as 155 hectares in the Plan. We believe that from evidence in a number of other documents that the developable land figure is actually circa 125 hectares. This would then square with the numerous statements the Councils and the SS5 site promoters have made on a 63.3 hectares employment land allowance equating to 50% of the site.

Phasing

- 1.17 The Plan states very clearly that no more than 25% of the site's residential capacity will be delivered within the plan period... "Preston West Strategic Location for a residential led mixed-use development comprising the erection of approximately 450 homes until 2041 with up to 1,400 additional homes to be delivered beyond the plan period" (p38).
- 1.18 There is no equivalent text in relation to the employment land capacity, and we regard this as an omission. The Plan should be clear on how much of any employment land allowance at SS5 is assumed to be delivered in the plan period.
- 1.19 In our view it is extremely unlikely that anything beyond 25% of the employment land allowance will be delivered in the plan period, given that this is the maximum proportion of the residential capacity that will be delivered in the same time period. The two should align for the purposes of the Plan.
- 1.20 **In conclusion, the 63.3-hectare employment land allowance at SS5 should be reduced considerably.** The totality of the employment land should be reduced to 42 hectares to reflect a more realistic indicative split of uses, and then only 25% of this total should be deliverable in the plan period. **This would result in a plan period employment land yield of 10.5 hectares on SS5.**

Q4.13(b) – Employment Land Yield on Site EC6 – Mixed Use Allocation in South Ribble.

- 1.21 The Publication Plan states that there will be supply of 50.0 hectares of employment land within the plan period at Site EC6.
- 1.22 The 50 hectares number is critically important in the context of the Plan's overall employment land policies – as it constitutes 29% of the stated employment land need of 173 hectares over the plan period. It is the second biggest individual employment land allowance in the Plan. EC6 also constitutes 82% of South Ribble's employment land allocations on one site. It is never advisable to be so reliant on one site in a particular area. It will expose the economy to considerable risk and a broader portfolio is better to ensure both choice and competition and to guard against risk.
- 1.23 In preparing the Publication Plan the Council and its partners have overestimated the scale of supply at the EC6:
- The claimed 50 hectares includes 16 hectares of expansion land which is under separate ownership. It is public knowledge that all of this expansion land has recently been sold to the NHS who are proposing to use the site for a new replacement hospital for the Royal Preston Hospital – which is clearly outside the definition of employment land.
 - The 50 hectares includes land, approximately 4 hectares, that is required for strategic landscaping and access arrangements as set out in the site masterplan. The 4 hectares of land should be netted off in line with standard practice in employment land assessments.
 - The approved site masterplan⁴ for the remaining 30 hectares shows that 20% of the proposed land/floorspace (i.e. 6 hectares) is for non-employment land uses, such as leisure and retail. This should also be deducted from the claimed employment land supply.
- 1.24 The above adjustments mean that the actual amount of employment land that could be delivered at EC6 is circa 24 hectares and not 50 hectares.
- 1.25 The Council has argued that it is premature to net off the 16 hectares of NHS land as there is no certainty that a hospital will be delivered and that there is a long lead in time where NHS thinking could change. Whilst the extended delivery timetable for a new hospital is not disputed, the 16 hectares of the site should still be netted

⁴ See Design and Access Statement of the 2022 planning application.

off. If the 16 hectares does not get used for a hospital it will be a long time before this is decided. So either way, there is very little chance this segment of the site will get used for employment land purposes in the plan period.

1.26 Our position, in broad terms, is also agreed by:

- The BE Group, who draw attention in their 2024 Employment Land Review to the fact that 16 hectares of the site is under separate ownership and that there will likely be some retail and leisure uses interspersed with employment land uses.
- The site promoters (Maple Grove) who state in their Reg 19 representations (ID A37) that... "*the additional land within the allocation boundary but outside of the aforementioned planning consent, is controlled by a third party, who is not a developer, outside of Maple Grove or Lancashire County Council's ownership and there is therefore no certainty that this area will be delivered*" (para 4.22).

1.27 In conclusion, the assumed supply of employment land at site EC6 within the plan period should be **reduced from 50 hectares to 24 hectares.**