

# Central Lancashire Local Plan Examination

## Matters, Issues and Questions

### Matters 8 & 9 – Employment Land Need and Allocations Policies EC1 – EC4

**Issue 8 – Are the provisions of the plan in relation to the provision of employment land justified and consistent with national policy?**

**8.1 Is the Employment Land Need figure of 173 hectares for the Plan period justified and are the assumptions and methodology from which it was arrived at soundly based? Does the assessment take adequate account of strategic employment needs, regional and national growth strategies and the specific locational requirements of different sectors?**

These questions are addressed separately below.

Is the Employment Land Need figure of 173 hectares for the Plan period justified and are the assumptions and methodology from which it was arrived at soundly based?

Yes - The Employment Land Need figure of 173 hectares for the Plan period is justified and its assumptions and methodology are soundly based. The Central Lancashire Authorities (CLAs)' Employment Land Study (ELS) identifies Objectively Assessed Needs (OANs) for each of the CLAs, by office and industrial/warehouse needs, and then combines the figures to reach an OAN of 173 hectares. The robust methodology and assumptions used to calculate those figures are explained and justified through the ELS ([ER06a](#)).

PPG Paragraph: 027 (Reference ID: 2a-027-20190220) regarding Housing and Economic Needs Assessments (HENAs), advocates the use of a range of data to identify employment needs, including analysis of the past take-up and labour demand. The guidance is not prescriptive, enabling freedom within which to prepare methodologies that can be reactive to best practice and context.

The ELS was undertaken by consultants BE Group, who have provided the CLAs with studies in 2017, 2019, 2022 ([ER05](#)) and 2025 ([ER06a/ER06b](#)) that include objectively assessed (employment) needs calculations and assess employment land supply. Note

ER06a/ER06b is a partial update of ER05 and should be read collectively. ER06a/ER06b was prepared within the context of NPPF (2023).

The latest published ELS (ER06a) provides a revised OAN, reflecting a different forecast period (2023-2041), changing macro-economic conditions, updated forecast methodologies, and the latest population projections. The ELS (ER06a) sets out its methodology for calculating an OAN. Methodologies within this space inevitably evolve, and paragraph (iii) of the ELS' Executive Summary confirms that *“this OAN exercise uses a substantially revised forecast methodology to that completed in previous ELS Studies, blending Labour Demand and Take Up based modelling.”* It consequently confirms that the updated study will not be directly comparable to previous ELS OANs. In doing so, BE Group's methodology draws influence from recent examinations, including where their methodology was tested at the Warrington Local Plan examination (adopted December 2023). At the Warrington Examination, the Inspector preferred to see a stronger role for forecasts of jobs growth in the assessment, providing some links to housing needs. BE Group consequently responded with a revised methodology in studies completed from 2023 onwards.

Para viii) of ER06b summarises the assumptions informing the study. This includes making allowances for the historic loss of office and industrial space within Preston, not otherwise seen within Chorley and South Ribble. This necessitated a nuance within the methodology where 'Gross' figures were used in Preston, whilst 'Net' figures were used in Chorley and South Ribble regarding 'Take up' data.

Nuances in the data used to assess each sector were also necessary to reflect their operation. As paragraph (x) of ER06b (page 7) explains, Industry and Warehousing needs are less linked to jobs growth and more linked to floorspace needs for plant/production/distribution. Consequently, for Industry and Warehousing, a past land take-up approach was preferred. Meanwhile, Office needs can be more closely correlated to jobs growth. Employment forecasts were therefore used to assess the Office sector.

The Labour Demand Model Two element of the OAN forecast model uses as its base the latest economic forecasts (winter 2023/2024), produced by Cambridge Econometrics and covering the Central Lancashire sub-region. These forecasts were the latest available projection on macro-economic conditions and are used in other evidence base research for the CLLP (ER06a: p7, para vii).

The assumptions and methodology which have been used to identify the employment land need figure are therefore soundly based.

Does the assessment take adequate account of strategic employment needs, regional and national growth strategies, and the specific locational requirements of different sectors?

Yes. The study took adequate account of strategic employment needs and the regional and national growth strategies that were available at the time it was prepared. These are listed within Table 3 (page 30) of ER05.

*Functional Economic Market Areas*

When exploring strategic employment need, PPG Paragraph: 025 (Reference ID: 2a-025-20190220) regarding Housing and economic needs assessments, necessitates that Functional Economic Market Areas (FEMA) should be defined. PPG Paragraph: 019 Reference (ID: 61-019-20190315) then advises that there is no standard approach to defining a FEMA but provides examples of data that that could be used. Central Lancashire's FEMA was first defined within the 2017 ELS, using the data typologies cited in the PPG. It extends to Blackpool, Fylde, Wyre, Blackburn with Darwen, Ribble Valley, West Lancashire, Bolton, and Wigan local authority areas. Central Lancashire's FEMA has continued throughout BE Group's studies since and is detailed within Section 6 of the ELS Update (2022) (ER05).

Within ER05, table 26 summarises the comments made by stakeholders from local planning authorities (LPAs) within the FEMA for consideration.

*Locational requirements of different sectors*

Exploration of the demand and locational requirements of different sectors set out within para 87 of NPPF (2024) was not a requirement explicit within NPPF (2023). The study however focused upon three sectors, categorised as Industry (manufacturing), Warehousing and Offices.

The results are summarised within pages 3-5 of ER06b and is the predominant content of ER06a, particularly Section 2. ER06a identifies a continued demand for industrial and warehouse space, but a depleted office market (apart from 'Grade A' offices) resulting from a modal shift towards homeworking.

*Lancashire Growth Plan*

The Lancashire Growth Plan (LGP) ([CLA04a](#)) seeks to set out a framework for economic growth in Lancashire. The Lancashire Combined Authority (LCCA) published a draft LGP

for public consultation in March 2025 and, following consideration of comments, a final plan was published in September 2025. The CLLP evidence studies, and Publication document, were therefore completed before a draft or final version of this regional strategy was published.

However, the LGP identifies a series of sectoral drivers of growth and the strategic enablers to support that economic growth, supported by several ‘transformational’ anchor projects. These projects include the Samesbury Enterprise Zone (SEZ) and Preston Station Quarter (PSQ) – which are supported through the CLLP. The National Cyber Force (NCF) is identified as a particular economic driver for the region, supporting the expansion of the defence and cyber industries along ‘cyber corridors.’

### *National Cyber Force (NCF)*

The CLAs recognise the importance of the NCF to regional growth and wish to support its role in the region. However, at the time the ELS was prepared (2023/24), no clear forecasts existed regarding jobs growth resulting from it with which to complete a ‘Policy-On’ analysis of the impact of the NCF. Consequently, its impact was not able to be considered within BE Group’s methodology (as noted within para 3.8 of ER06a) owing to the absence of consistent or reliable information. BE Group have since confirmed that whilst a Policy On analysis of the need generated from the extra jobs could be produced (based on the Plexal/Lancashire Growth Plan estimates), it would need to make a lot of assumptions and would likely only lead to a very modest uplift in employment land needs. The following paragraphs demonstrate that work has been undertaken since then to review the appropriateness of the evidence base.

Through the Regulation 19 consultation, a series of representations have been received (A53.2, A54.2, A27, A55.3, A60.5, D03.5, A36.3, D03.6 and A36.2) arguing that the plan has failed to consider the NCF in its forecasts, including through the OAN calculations. The CLAs dispute this and have prepared a National Cyber Force Topic Paper, detailing how the NCF has been considered through the plan. This is provided as an Appendix to the MIQs. The CLAs have liaised with NCF personnel directly and have been provided with a response detailed within Matter 3, Question 3.4. NCF’s estimate confirms that the jobs growth assumptions evidence some representors rely upon is not robust. Ultimately, whilst the CLAs are supportive of the NCF and the opportunities it can deliver, there is currently insufficient evidence relating to the scale, nature, or geographic distribution of NCF related growth. The CLLP provides a range of employment sites that are suitable to accommodate cyber-related businesses in a sustainable way, consistent with the priorities of the CLLP – including through the SEZ and PSQ.

**8.2 Are the findings of the Employment Land Review in relation to the suitability of existing sites reasonable and are its conclusions in relation to existing supply soundly based? What is the identified supply of existing sites within the 3 Authorities? What is the resulting “shortfall” that the Plan seeks to address for the Plan period?**

Yes - the study’s Employment Land Review (ELR) is set out within Section 4 of [ER06a](#). Its findings in relation to the suitability of sites are reasonable and its conclusions in relation to existing supply are soundly based.

Tables 42-44 and the scoring systems presented in Appendices 3 + 4 of ER06a show a consistent methodology regarding site assessment. Tables 54-57 summarise the outcome of the assessments. Consistent with Stage 1a of the Strategic Housing and Economic Land Availability Assessment (SHELAA) (HO14a, para 3.3-3.4), sites within the Green Belt were ‘parked’ pending whether exceptional circumstances could be demonstrated to justify reviewing Green Belt boundaries. For this reason, it was unnecessary for the ELR to consider any Green Belt sites.

The total supply of employment sites within each authority is set out within the table below, including the “shortfall” the plan’s allocations will address:

	Requirement	Existing allocations	“Shortfall” (Existing allocations – Requirement)	New allocations	Supply: Total Allocations	Supply: Total Allocations + Windfall	Total Supply: (Completions + Total Allocations + Windfall)	Total supply - Requirement
<b>Totals</b>	<b>172.87</b>	<b>126.91</b>	<b>-45.96</b>	<b>90.47</b>	<b>217.38</b>	<b>332.54</b>	<b>357.63</b>	<b>184.76</b>
Chorley	41.45	15.36	-26.09	4.22	19.58	29.39	40.82	-0.63
Preston	74.43	50.25	-24.18	86.25	136.5	193.99	204.04	129.61
S.Ribble	56.9	61.3	4.31	0	61.3	109.16	112.77	55.78

The table shows an excess of supply against BE Group’s proposed OAN, particularly within Preston. There is a small deficit in Chorley against the requirement given allocation EC2.2 is now no longer proposed for employment development (see response to matter 9.2 below), however this deficit is addressed by the overall surplus across Central Lancashire. A breakdown of the supply can be made available at the Inspector’s request. See answer to Q9.3 for further details regarding employment supply.

**Issue 9 - Are the proposed employment allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?**

**9.1 How were employment sites selected? In particular:**

**• What factors led to their allocation?**

The Housing and Employment Allocations: Site Selection Process ([HO15](#)) summarises the site selection process used for the (housing and) employment land allocations. This was based on the SHELAA methodology, which details the factors that led to their allocation, set out in [HO14a](#) SHELAA Main Report. The SHELAA assessments of the employment land sites are summarised in the site profiles at Appendix 5: [HO14c](#) (Chorley), Appendix 6: [HO14d](#) (Preston) and Appendix 7: [HO14e](#) (South Ribble) of the SHELAA.

Site selection was also influenced by analysis of individual sites (during 2024) by BE Group, set out within ELS ([ER06a Section 2](#)).

Those sites that were determined to be developable through the SHELAA and ELS assessment process, were taken forward as allocations.

Please also refer to the answer to Matter 9, Question 9.2(b).

Further details regarding the site selection process can be found within Matter 2.4.

**• Are they based on up-to-date evidence?**

Yes. The SHELAA Main Report [HO14a](#) and its Site Profiles Appendix 5: [HO14c](#) (Chorley), Appendix 6: [HO14d](#) (Preston) and Appendix 7: [HO14e](#) (South Ribble) are dated January 2025. [HO15](#) Housing and Employment Allocations: Site Selection Process is dated January 2025. Site selection was also influenced by analysis of individual sites (during 2024) by BE Group, set out within [ER06a](#) Section 2. Any relevant planning history updates are covered in the responses for each Employment Land Allocation in 9.2 below.

**• Were they selected in comparison with possible alternatives using a robust and objective process?**

Yes. The plan's portfolio of employment allocations was systematically assessed against the sustainability objectives set out within the Integrated Assessment ([CD05](#)).

Assessments of exclusively employment allocations are introduced at para 6.239 of [CD05](#) and detailed in tables 6.12 to 6.14. Assessment of mixed-use allocations begins at para 6.270 and detailed in Tables 6.15 and 6.16. Reasonable alternatives to these sites are discussed within paras 5.48 – 5.55.

All sites identified through the SHELAA, including four Call for Sites exercises, were assessed as to their suitability for housing and/or employment development. As set out through the SHELAA methodology, any sites in the Green Belt were ‘parked’ until such time that the CLAs determined whether Green Belt release was needed. The CLAs confirm through the CLLP, that they can meet their employment OAN without necessitating Green Belt release. Consequently, sites have been selected against all possible alternatives (excluding Green Belt sites) using a robust and objective process.

Further details regarding the site selection process can be found within Matter 2.4.

**• Does the site selection process take adequate account of the individual needs of each Authority? How far was this a factor in the selection of sites?**

The site selection process (see Matter 2.4 for details) generated a shortlist of sites from which each authority could deliver its needs. From this point, a professional judgement was made (informed by other evidence) by each authority pursuant to selecting a portfolio of allocations from the shortlist, which cumulatively would deliver against the proposed OAN requirement. All suitable, available, and achievable sites were selected. Tables showing employment supply across the three districts are presented in answers to questions 8.2 and 9.3. These show that any shortfalls identified in Chorley and/or South Ribble through the examination could be accommodated in Preston.

**• What account has been taken of regional and national growth strategies in determining employment need?**

Answer 8.1 includes details of the regional and national growth strategies which were available when the BE Group evidence was prepared (2023/24).

The plan’s policies were also broadly influenced by the Final Report of the Lancashire Independent Economic Review ([ER04](#)). This sets out Lancashire’s major economic challenges and objectives, making 14 recommendations. These cover the themes of funding, skills, and land use. The plan will contribute towards recommendations 7, 8, 9, 12 and 13.

The CLA's answer to Question 3.4, includes details of how the CLLP has considered the Lancashire Growth Plan (LGP), within the context of housing and employment need. The LGP also cites the Blackburn Growth Axis (BGA) concept as one of multiple strategic corridors in the region. In their Regulation 19 response, Blackburn with Darwen (BwD) (D3) have raised concerns that the CLAs have not adequately considered the BGA. It was first published within Policy CP2 of the Blackburn with Darwen (BwD) Local Plan (2024) and is an economic strategy, linking development opportunities within BwD to the M65, key growth corridors, Samlesbury Enterprise Zone (SEZ), and Blackburn Town Centre. Whilst the BGA was referenced within the BwD Local Plan, actual details of the axis remain vague. BwD responses to the Inspectors of the BwD Local Plan Examination (2022), confirmed that the BGA was still in draft form at that time (CLA09). A final BGA framework has still never been published. Furthermore, the BwD Statement of Common Ground (dated 2022) signed by all BwD's neighbouring authorities pursuant to fulfilling the BwD Local Plan Duty to Co-operate test (CLA10) makes no reference to the BGA. The decision to adopt the BGA was therefore made unilaterally by BwD. Consequently, despite its reference with the LGP, the BGA is not a regional growth strategy that has informed employment need or guided the allocation of sites. There is simply not enough evidence regarding the BGA available for the CLAs to act upon.

The CLLP will support many of the LGP's objectives. The 'Anchor sites' identified in the LGP (Appendix B) are also identified within the CLLP, including: Samlesbury Enterprise Zone (Policy EC1(5)) and Preston Station Quarter (Policy EC12(b)). Thematic development policies such as EC9: Skills and inclusion will also help achieve the LGP's ambition to develop the county's workforce.

## **9.2 In relation to the following sites:**

### **CHORLEY**

#### **EC2.1 Land East of the M61, Chorley**

##### **a) Are the requirements set out in Policy EC2 clear, justified and effective?**

Yes. Policy EC2 allocates and protects this site for employment land in Chorley and clearly states that proposals meeting the accompanying KDCs for this site set out within Appendix 5 of the CLLP will be supported. The policy also makes clear that a wintering bird survey will be required for this allocation in accordance with Policy EN7.

Allocation of this site is justified as all potential employment sites, including EC2.1, were identified and assessed through the SHELAA ([HO14a](#)). The accompanying site profiles ([HO14c](#)) detail the assessments of each site taken forward to Stage 2 of the SHELAA. The suitability and deliverability of potential employment sites have also been considered through the Employment Land Study (EC06a-EC06f), with the site scoring system set out in Appendix 3 ([EC06e](#)) and assessments detailed in Appendix 4 ([EC06f](#)). Sites have therefore been selected for allocation based on their suitability and deliverability, taking into account all reasonable alternative sites.

EC2.1 is considered to be effective because it has been identified as being deliverable over the plan period and capable of contributing to the supply of employment land across Central Lancashire.

**b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

Yes. Site constraints and off-site impacts have been identified and fully assessed through the SHELAA process. The SHELAA site profile for this site is set out on pages 45-47 of the SHELAA Chorley Site Profiles ([HO14c](#)). The site is identified as suitable, available, and achievable in the SHELAA.

The only constraint identified for this site relates to flood risk. A Level 2 SFRA was required as the Level 1 SFRA identified that the site is at risk from reservoir flooding and surface water flooding. The Level 2 SFRA concluded that it should be appropriate to develop this site for employment uses given its location in Flood Zone 1 and the majority of the site being at very low risk of surface water flooding. It identified that there is a potential residual risk of flooding from the adjacent Leeds Liverpool Canal, and that a FRA will be required at the planning application stage. The FRA will be required to include ground investigations to ascertain groundwater levels and conditions, this requirement is set out in the KDCs. It is therefore considered that any flood risk issues can be mitigated.

In relation to highways, Lancashire County Council as the Highways Authority referred to the comments they submitted to a previous outline planning application for the site. They were satisfied with the Transport Assessment submitted alongside the planning application and concluded that the development can be accommodated locally and strategically. Any future planning application will also need to be supported by a Transport Assessment and Travel Plan, as set out in the KDCs.

The Integrated Assessment: Development Site Options ([RD03a](#)) provides an assessment of the site against 18 objectives. It identifies potential significant negative effects in relation to flood risk, however flood risk has been addressed through the SFRA as identified above. Potential significant negative effects are also identified in relation to biodiversity, landscape, and resources however the effects are uncertain, and it is considered that any impact can be mitigated.

The Habitats Regulation Assessment ([CD07](#)), identifies that development will result in the loss of functionally linked land within the allocation and requires a wintering bird survey to be submitted alongside any planning application to provide certainty that this loss will not adversely affect the integrity of SPA and Ramsar Sites. This requirement is set out in the KDCs.

The site was also assessed as part of the Employment Land Study Update 2024 ([ER06a](#)). The identified constraints include; the site is within an area forming part of the River Chor, part of the site is within an ecological network, the site is crossed by a footpath and there is very little drainage infrastructure and no water infrastructure available in this area. It is considered that these constraints can be mitigated and would not prevent development of the site. Overall, the ELS concludes that the site is deliverable and available to meet longer term employment needs.

The above information demonstrates the detailed assessment of constraints that has been undertaken and how these constraints have been taken into account when assessing the suitability of the site for allocation. The KDCs set out requirements in relation to these constraints that will need to be addressed through any planning application. It is considered that all constraints can be addressed through mitigation.

Furthermore, the site previously had outline planning permission for employment (this permission has expired) which supports the conclusion that the site is suitable for employment development.

Natural England submitted a representation to the Regulation 19 consultation, identifying the site is situated on deep peat and advising that further information is required to determine if restorable peat is present. The Council's view is that this can be addressed at the planning application stage through the preparation of a Construction Environmental Management Plan in accordance with the requirements of Policy EN14.

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

Yes. The SHELAA assesses each site in detail and identifies any constraints and infrastructure requirements. Through the SHELAA process it has been identified that there is a suitable highways access to the site via the A674, however a Transport Assessment and Travel Plan will be required alongside any planning application which will identify any highways/transport infrastructure requirements. Some drainage infrastructure may also be required, this will be identified through a FRA which is required alongside any planning application. These requirements are set out in the KDCs.

The CLLP KDCs (Appendix 5, [CD01](#)) set out the Council's expectations for development to address the specified key considerations through subsequent planning applications. The evidence has concluded that site constraints are capable of being mitigated, and the necessary infrastructure can be provided, subject to early discussions with infrastructure and service providers. The KDCs confirm that planning obligations may also be required to help mitigate the impacts of the development.

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

Yes. The developability of the site was assessed through the SHELAA. The site is identified as being suitable, available, and achievable in the SHELAA. As identified in response to the previous questions, it is considered that any constraints can be mitigated.

The Employment Land Study Update 2024 ([ER06a](#)), identifies the site as being deliverable which is evidenced through employment development currently taking place on adjacent land at Botany Bay. It states that the market continues to support at least smaller units on this allocation which could form a later phase to the adjacent Botany Bay Business Park which is currently under construction. It concludes that a medium-term development is likely on this allocation.

No concerns about viability have been raised in the Viability Report ([IT05](#)) or Employment Land Study.

Contact has been made with the site owner who has confirmed their intention to bring the site forward for employment development following the end of a current lease of the site which runs until 2027.

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

It is considered that there are no omissions in the policy and it is sufficiently flexible. No representations, other than the one from Natural England identified in the response to question b) above, were received on the site as part of the Regulation 19 consultation.

**EC2.2 Former Gas Works, Bengal Street, Chorley**

The site was promoted to the Council as an employment allocation by the landowner through the CLLP and SHELAA process. However, following submission of the CLLP, planning permission has been granted on the site for non-employment uses (a gym and a retail unit). It is therefore suggested that this allocation is removed from the CLLP given there is no longer evidence that the site will come forward for employment development. For this reason, no response has been provided to the questions below.

**a) Are the requirements set out in Policy EC2 clear, justified, and effective?**

N/A

**b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

N/A

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

N/A

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

N/A

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

N/A

## **PRESTON**

### **EC3.1 Former Alstom Works and Wider Site, Channel Way, Preston**

#### **a) Are the requirements set out in Policies EC3 clear, justified and effective?**

Yes. Policy EC3 clearly specifies the sites which are allocated and protected for employment land in Preston and clearly states that proposals meeting the accompanying KDCs set out within Appendix 5, pages 246-247, [CD01](#), will be supported. Policy EC3 sets out the total site area of each employment land allocation in Preston and the use classes appropriate in principle within each allocation.

The allocated sites have been identified through the SHELAA ([HO14a](#)) and the accompanying site profiles ([HO14d](#)) detail the assessments of each site. Site Profile 5 for the EC3.1 employment land allocation is provided at pages 13-16 of SHELAA Preston site profiles [HO14d](#), Appendix 6, which sets out site requirements in the Requirements (and Masterplan if applicable) section on page 15.

The suitability and deliverability of potential employment sites have also been considered through the Employment Land Study ([EC06a](#)), with the site scoring system set out in Appendix 3 ([EC06e](#)) and assessments detailed in Appendix 4 ([EC06f](#)). Sites have therefore been selected for allocation based on their suitability and deliverability, taking into account all other reasonable alternatives of sites.

Policy EC3 is considered to be effective because the sites have been assessed as deliverable over the plan period and capable of contributing to the supply of employment land across the Central Lancashire area.

#### **b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

Yes. The Council's SHELAA ([HO14a](#)) and methodology ([HO14b](#)) set out how the Council have undertaken a land availability assessment for housing and economic uses. The SHELAA assesses the suitability of land for different uses, in accordance with national policy and guidance. A variety of information has been used in the assessments, including site constraints and off-site impacts. The Preston site proformas ([HO14d](#)) details those assessments. The EC3.1 site, Site Profile 5 of HO14d, (SHELAA Ref: 19P012 / 19P198) was concluded to be suitable, available, and achievable for development, where all identified constraints are likely to be able to be mitigated. The site is located in Preston Urban Area (Tier 1 of the settlement hierarchy) where there is a good range of services and facilities.

Key Development Considerations for the EC3.1 site are set out in Appendix 5, pages 246-247, [CD01](#) CLLP and include mitigation measures around flood risk, archaeology, highways and environmental quality. These considerations can be addressed through design and early engagement with infrastructure and service providers, to enable the delivery of the site. The site constraints of EC3.1 were assessed in [ER06a](#), Table 43 (pages 130-131) and scored in [ER06f](#) Appendix 4 using the site scoring system detailed in [ER06e](#) Appendix 3.

Site constraints were incorporated into the SHELAA methodology ([HO14a](#) SHELAA Main Report, paragraphs 2.4, 2.7, 2.11-2.13, 2.17-2.18, 2.22-2.23, 2.32-2.33, 2.36 and 3.6-3.10). Where constraints have been identified an assessment was made as to whether, when, and how they could be realistically overcome (i.e. potential actions / mitigation measures). Any assumptions made as regards how and when constraints could be overcome have been justified ([HO14a](#), SHELAA, paragraph 2.36).

The detailed Stage 2 SHELAA assessment covered other site constraints and any off-site impacts as identified in [HO14a](#) SHELAA paragraph 3.20. The findings of this are summarised in Preston site profile [HO14d](#), Appendix 6, Site Profile 5, Reference EC3.1: Former Alstom Works and Wider Site, Channel Way.

Constraints and off-site impacts, including that on highways and the strategic road network (SRN) were also considered through the Employment Land Study (ELS) [ER06a](#), Table 43 (page 130-131 for EC3.1), which found no significant site constraints and scored in [ER06f](#) Appendix 4 using the site scoring system detailed in [ER06e](#) Appendix 3. In their Regulation 19 representations, United Utilities (UU) ([D15.13\\_Supp2](#)) raise that there are site-specific constraints (specifically a pressurised water main, sewer overflow from the wastewater network structure, a gravity sewer, on-site flooding incident, near to flooding incident and reservoir flood risk) not explicitly addressed in the KDCs, and National Highways ([D16.13\\_Supp1](#)) comment regarding the impact of the site on the strategic road network (SRN). The KDCs require early engagement with both UU and Highway Authorities to ensure appropriate mitigation, and the absence of explicit requirements within the KDCs enables full flexibility for site discussions and design.

Historic England in their representation to the Regulation 19 consultation D02.24 [CD10](#), requested that the KDCs for each employment land allocation within CD01 Appendix 5, should reference the Heritage Impact Assessment (HIA) that has been completed by the Council. The CLAs consider this unnecessary because the requirement for HIAs is covered by Policy EN13(1(b)).

Site constraints and off-site impacts are taken into consideration in [CD07](#) HRA – Screening and Appropriate Assessment (LUC, January 2025). Chapter 2 confirms the

employment land allocations were assessed in the HRA. Tables C.1 and D.1 identify respectively whether the employment land allocations are located within functionally linked land buffers or within 500 metres of those buffers for each Habitats site. Tables E.1, E.2 and E.3 contain a review of site parameters and assess the suitability of those allocations to be functionally linked land for qualifying bird species of relevant SPA and Ramsar sites.

Table 6.13 of the Integrated Assessment of the CLLP: Pre-Submission CLLP Final Report (CD05) summarises the likely effects of the Policy EC3 Employment Land Allocations in Preston, with any off-site impacts assessed in further detail on page 193. The total effects of all the CLLP policies, including of the employment land allocations in Preston, are presented in Table 7.1. The cumulative effects of the CLLP (January 2025) are summarised in Table 7.2.

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

Yes. Reference should be made to the KDCs for EC3.1 in Appendix 5, pages 246-247 of the [CD01](#) CLLP and to the Infrastructure section of Preston site profile [HO14d](#), Appendix 6, Site Profile 5, Reference EC3.1: Former Alstom Works and Wider Site, Channel Way.

[ER06f](#) Appendix 4: Sites Scoring System findings – Central Lancashire Employment Land Supply and OAN Update (2024, BE Group) contains proximity to the Strategic Road Network as a site-scoring criteria, with the detailed criteria for this set out in [ER06e](#) Appendix 3: Site Scoring System.

The SHELAA site assessments ([HO14d](#)) and Employment Land Study (EC06 (a-f)) identify the potential constraints for the site, and the CLLP KDCs (Appendix 5, [CD01](#)) set out the Council's expectations for development to address the specified key considerations through subsequent planning applications. The evidence has concluded that site constraints are capable of being mitigated, and the necessary infrastructure provided, subject to early discussions with infrastructure and service providers. The KDCs confirm that planning obligations may also be required to help mitigate the impacts of the development.

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

Yes. The deliverability of the Preston employment land allocations was assessed in evidence [ER06a](#), Table 55, by the BE Group, specifically on page 171 concerning the Alstoms site. Site conditions of services availability, constraints, environmental setting and flexibility, which can affect viability, were scored in [ER06f](#) Appendix 4 by the BE Group, with these criteria described in [ER06e](#) Appendix 3: Site Scoring System.

The site is an existing employment use. Preston site profile [HO14d](#), Appendix 6, Site Profile 5, Reference EC3.1: Former Alstom Works and Wider Site, Channel Way found that the site is achievable for employment use.

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

It is considered there are no omissions in Policy EC3.1: Former Alstom Works and Wider Site, Channel Way, Preston and that it is sufficiently flexible.

No concerns (other than those referred to in part (b) of our response on this EC3.1 site) have been raised through Regulation 19 representations and the CLAs do not consider that any changes are required to address these concerns.

**EC3.2 Preston East Junction 31A M6**

**a) Are the requirements set out in Policies EC3 clear, justified and effective?**

Yes. Policy EC3 clearly specifies the sites which are allocated and protected for employment land in Preston and clearly states that proposals meeting the accompanying KDCs set out within Appendix 5 will be supported. KDCs for the EC3.2 site are set out in Appendix 5, pages 248-249, [CD01](#) CLLP. Policy EC3 sets out the total site area of each employment land allocation in Preston, and the use classes appropriate in principle within each allocation.

The allocated sites have been identified through the SHELAA ([HO14a](#)) and the accompanying site profiles ([HO14d](#)) detail the assessments of each site. Site Profile 22 for the EC3.2 employment land allocation is provided at pages 66-68 of SHELAA Preston site profiles [HO14d](#), Appendix 6, which sets out site requirements in the Requirements (and Masterplan if applicable) section on page 68.

The suitability and deliverability of potential employment sites have also been considered through the Employment Land Study (EC06), with the site scoring system

set out in Appendix 3 ([EC06e](#)) and assessments detailed in Appendix 4 ([EC06f](#)). Sites have therefore been selected for allocation based on their suitability and deliverability, taking into account all other reasonable alternatives of sites.

Policy EC3 is considered to be effective because the sites have been assessed as deliverable over the plan period and capable of contributing to the supply of employment land across the Central Lancashire area.

**b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

Yes. The Council's SHELAA ([H014a](#)) and methodology ([HO14b](#)) set out how the Council have undertaken a land availability assessment for housing and economic uses. The SHELAA assesses the suitability of land for different uses, in accordance with national policy and guidance. A variety of information has been used in the assessments, including site constraints and off-site impacts. The Preston site proformas ([HO14d](#)) details those assessments. The EC3.2 site, Site Profile 22 of HO14d, (SHELAA Ref: 19P141) was concluded to be suitable, available, and achievable for development and was noted to be adjacent to an established employment area (Red Scar Industrial Estate).

Site constraints were incorporated into the SHELAA methodology ([HO14a](#) SHELAA Main Report, paragraphs 2.4, 2.7, 2.11-2.13, 2.17-2.18, 2.22-2.23, 2.32-2.33, 2.36 and 3.6-3.10). Where constraints have been identified an assessment was made as to whether, when, and how they could be realistically overcome (i.e. potential actions / mitigation measures). Any assumptions made as regards how and when constraints could be overcome have been justified (HO14a, SHELAA, paragraph 2.36).

The detailed Stage 2 SHELAA assessment covered other site constraints and any off-site impacts as identified in HO14a SHELAA paragraph 3.20. The findings of this are summarised in Preston site profile HO14d, Appendix 6, Site Profile 22, Reference EC3.2: Preston East Junction 31A M6.

KDCs for the EC3.2 site are set out in Appendix 5, pages 248-249 of the [CD01](#) CLLP and include mitigation measures around flood risk, archaeology, highways, designated sites for nature conservation (wintering bird survey requirement at planning application stage) and environmental quality. These considerations can be addressed through design and early engagement with infrastructure and service providers, to enable the delivery of the site.

Historic England in their representation to the Regulation 19 consultation D02.24 ([CD10](#)), requested that the KDCs for each employment land allocation within CD01

Appendix 5, should reference the Heritage Impact Assessment (HIA) that has been completed by the Council. The CLAs consider this unnecessary because it is covered by Policy EN13(1(b)).

The site has a scoping opinion, App Ref: 06/2025/0208, provided in March 2025, which found an EIA is required at the planning application stage for a proposed 86,462sq.m. employment park, of which 85,992sq.m. GEA would be for B2 and / or B8 use and 470sq.m. GEA for drive thru units. App Ref: 06/2021/0174, decided in March 2021 also found an EIA would be required for an 80,000sq.m. B2 / B8 use employment park at the 26.5ha site as mentioned in [ER06a](#) Table 43.

Constraints and off-site impacts, including that on highways and the strategic road network (SRN) were also considered through the Employment Land Study (ELS) [ER06a](#), Table 43 (page 125 for EC3.2) and scored in [ER06f](#) Appendix 4 using the site scoring system detailed in [ER06e](#) Appendix 3. [ER06a](#) paragraphs 4.21 and 4.31 identify no significant site constraints. The Market Fit column of [ER06a](#) Table 43 raises the almost immediate M6 access from Junction 31(a) as attractive to large occupiers whilst acknowledging the southbound only access.

In this respect, the Council's response to D16.13 in [CD11a](#): Consultation Responses - By Representor ID, notes potential impacts may occur to the Strategic Road Network due to the size and proximity of the employment land allocation to the SRN and that the council will continue to liaise with National Highways as a statutory consultee. The SOCG with LCC (September 2025), [DC11](#) section 5: Strategic Matters (1) Transport, in particular paragraph 5.3, shows that the site allocations were prepared considering highways and access matters.

In respect of D16.13 and A31.12 ([CD10](#)), reference should also be made to the findings of the Stage 2A Transport Assessment Report, which summarises the sustainable mitigation and highways options and to the Stage 2B Transport Assessment Report (IT07, September 2025). [IT07](#) penultimate bullet point on page 41, page 76 and page 131 indicate the off-site highway impacts of the employment land allocation:

*'A major employment site proposed in the Local Plan (EC3.2 Preston East Junction 31A M6), expected to generate approximately 1,000 jobs, is located near Bluebell Way with direct access to the eastern Bluebell roundabout, which connects to the M6 at J31A. This development is anticipated to add traffic to an already congested junction, resulting in slight increases on the M6 slip roads. However, due to VDM and traffic assignment re-routing, this additional traffic is expected to reduce volumes along the B6242 corridor.'*

Page 131 notes ‘a potential improvement at this location will need to be considered as part of the Transport Assessment for the allocated site at Preston East (J31A M6, Ref: EC3.2), when that site comes forward for development. However, as the safety issue is pre-existing and the site is expected to generate a relatively small number of trips to the merge, it may again be considered that the cost of mitigation is disproportionate. As such, NH may need to explore alternative funding routes to address the existing safety issue at J31A— potentially through future Road Investment Strategy (RIS3 or RIS4) programmes as part of a maintenance or safety improvement scheme.’

In their Regulation 19 representations, United Utilities (UU) ([D15.13\\_Supp2](#)) raise that there are site-specific constraints (specifically a pressurised water main and a water main easement) not explicitly addressed in the KDCs, and National Highways ([D16.13\\_Supp1](#)) comment regarding the impact of the site on the strategic road network (SRN). The KDCs require early engagement with both UU and Highway Authorities to ensure appropriate mitigation, and the absence of explicit requirements within the KDCs enables full flexibility for site discussions and design.

Site constraints and off-site impacts are taken into consideration in [CD07](#) HRA – Screening and Appropriate Assessment (LUC, January 2025). Chapter 2 confirms the employment land allocations were assessed in the HRA. Tables C.1 and D.1 identify respectively whether the employment land allocations are located within functionally linked land buffers or within 500 metres of those buffers for each Habitats site. Tables E.1, E.2 and E.3 contain a review of site parameters and assess the suitability of those allocations to be functionally linked land for qualifying bird species of relevant SPA and Ramsar sites.

[CD05](#) Integrated Assessment of the CLLP: Pre-Submission Local Plan Final Report, Table 6.13, summarises the likely effects of the Policy EC3 Employment Land Allocations in Preston, with any off-site impacts assessed in further detail on page 193. The total effects of all the CLLP policies, including of the employment land allocations in Preston, are presented in Table 7.1. The cumulative effects of the CLLP (January 2025) are summarised in Table 7.2.

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

Yes. In respect of highway issues please refer to the answer to question b above. The SHELAA site assessments ([HO14d](#)) and Employment Land Study (EC06 (a-f)) identify the potential constraints for the site, and the CLLP KDCs (Appendix 5, [CD01](#)) set out the Council's expectations for development to address the specified key considerations through subsequent planning applications. The evidence has concluded that site constraints are capable of being mitigated, and the necessary infrastructure provided, subject to early discussions with infrastructure and service providers. The KDCs confirm that planning obligations may also be required to help mitigate the impacts of the development.

[ER06f](#) Appendix 4: Sites Scoring Results of the Employment Land Study – Land Supply and OAN Update (2024, BE Group) assesses proximity to the Strategic Road Network. This criterion is described in [ER06e](#) Appendix 3: Site Scoring System.

Reference should be made to the Key Development Considerations for the EC3.2 site in Appendix 5, pages 248-249 of the [CD01](#) CLLP and to the Infrastructure section of Preston site profile [HO14d](#), Appendix 6, Site Profile 22, Reference EC3.2: Preston East Junction 31A M6.

[MO03](#) Preston City Council Employment Land Monitoring Report 2025 identifies scoping opinion App Ref: 06/2025/0208 (decided March 2025). The Scoping Report for an EIA of App Ref: 06/2025/0208 identifies in paragraph 7.3.11 that the proposed development will deliver improved highway infrastructure as part of the embedded mitigation, such as new footways, cycleways, and pedestrian crossing facilities. The description of App Ref: 06/2025/0208 includes proposed 'vehicular, cycling, and pedestrian access off the existing roundabout and internal roads / servicing areas, landscaping, SuDS features, and associated works.

Thus, it is considered that the infrastructure required for employment development of employment land allocation EC3.2 Preston East Junction 31A M6 is realistic and deliverable.

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

Yes. The site has been assessed through the SHELAA ([HO14a](#), [HO14b](#), [HO14d](#)) and ELS (EC06a-f) evidence to be developable, and no concerns around viability have been

identified through the Viability Report ([CD13](#)). The deliverability of the Preston employment land allocations was assessed in evidence [ER06a](#), Table 55, by the BE Group. Site conditions of services availability, constraints, environmental setting and flexibility, which can affect viability, were scored in [ER06f](#) Appendix 4 by the BE Group, with these criteria described in [ER06e](#) Appendix 3: Site Scoring System.

[ER06a](#), Table 43 (page 125) found allocation of the site for employment use is in principle viable and developable during the plan period with paragraph 4.31 of [ER06a](#) finding the site has 'good development prospects' and in Table 55: Sites Analysis – Preston Preferred Sites, page 170, naming developer partner, Trebor Developments in a Joint Venture with Hillwood developments as having been secured, marketing the site as Gateway Park.

Preston site profile [HO14d](#), Appendix 6, Site Profile 22, Reference EC3.2: Preston East Junction 31A M6 summarises the BE Group site assessment findings, site constraints, the sustainability appraisal findings of the site allocation and site requirements. The site is adjacent to an existing employment area and the Site Profile recommends to allocate the site for employment use, indicating together with the site profile site specific findings that the site is viable and developable for employment use.

The existing James Hall (Spar) Regional Distribution Centre is located south of the site, within the wider existing Red Scar industrial estate. The Preston East development at units 1, 2, 6 and 7 has recently been delivered at the same junction, south-west of the site. This helps to demonstrate that large scale Class B2 / B8 employment use is deliverable in this area, as evidenced in the [MO03](#) Preston City Council Employment Monitoring Report 2025 Tables 2 and 9 (column EP1.3: Preston East).

[MO03](#) paragraph 4.2 mentions an employment scheme has been indicated through an EIA scoping opinion application, but a related planning application has not been submitted. This remains the up-to-date position. Page 10 of [MO03](#) identifies scoping opinion App Ref: 06/2025/0208 (decided March 2025), which found an EIA is required at the planning application stage for a proposed 86,462sq.m. employment park. The proposal involves the provision of a new build employment development covering the entire employment land allocation for 85,992sq.m. GEA for B2 and / or B8 use and 470sq.m. GEA for drive thru units. It is considered this indicates developer interest in developing the allocation for employment use during the plan period and thus indicates it is viable and developable.

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

It is considered there are no omissions in Policy EC3.2 Preston East Junction 31A M6 and that it is sufficiently flexible. The policy does not constrain the employment development of the allocation to the scheme proposed in scoping opinion App Ref: 06/2025/0208 thereby allowing for alternative development formats.

The scheme proposed in scoping opinion App Ref: 06/2025/0208 includes some drive-thru units which fall outside the E(g), B2 and B8 use classes. However, these are likely to be considered to provide an ancillary function and scale to the employment development of the site by providing refreshment options for site employees and for the wider EC7 Existing Employment Sites at Red Scar to the south. It is considered that Policy EC3.2 allows for such flexibility in the mix of uses that may be required to help to serve the food, drink and rest break requirements generated by future employees and any HGV use at the employment land allocation.

No concerns (other than those referred to in part (b) of our response on this EC3.2 site) have been raised through Regulation 19 representations and the CLAs do not consider that any changes are required to address these concerns.

**EC3.3 11 Roman Road Farm**

**a) Are the requirements set out in Policies EC3 clear, justified and effective?**

Yes. Policy EC3 clearly specifies the sites which are allocated and protected for employment land in Preston and clearly states that proposals meeting the accompanying KDCs set out within [CD01](#) Appendix 5 will be supported. Policy EC3 sets out the total site area of each employment land allocation in Preston, and the use classes appropriate in principle within each allocation.

The allocated sites have been identified through the SHELAA ([HO14a](#)) and the accompanying site profiles ([HO14d](#)) detail the assessments of each site. Site Profile 23 for the EC3.3 employment land allocation is provided at pages 69-71 of SHELAA Preston site profiles [HO14d](#), Appendix 6, which sets out site requirements in the Requirements (and Masterplan if applicable) section on page 71. This confirms that issues identified will have been addressed as part of the extant (outline App Ref: 06/2022/0745) planning permission. The suitability and deliverability of potential employment sites have also been considered through the Employment Land Study (EC06a-f), with the site scoring system set out in Appendix 3 ([EC06e](#)) and assessments detailed in Appendix 4 ([EC06f](#)). Sites have therefore been selected for allocation based

on their suitability and deliverability, taking into account all other reasonable alternatives of sites.

Policy EC3 is considered to be effective because the sites have been assessed as deliverable over the plan period and capable of contributing to the supply of employment land across the Central Lancashire area.

**b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

Yes. The Council's SHELAA ([HO14a](#)) and methodology ([HO14b](#)) set out how the Council have undertaken a land availability assessment for housing and economic uses. The SHELAA assesses the suitability of land for different uses, in accordance with national policy and guidance. A variety of information has been used in the assessments, including site constraints and off-site impacts. The Preston site proformas ([HO14d](#)) details those assessments. The EC3.3 site, Site Profile 23 of HO14d, (SHELAA Ref: 19P142) was concluded to be suitable, available, and achievable for development because it has extant outline planning permission for employment use.

Constraints and off-site impacts, including that on highways and the strategic road network (SRN) were also considered through the Employment Land Study (ELS) [ER06a](#), Table 43 (page 126 for EC3.3) and scored in [ER06f](#) Appendix 4 using the site scoring system detailed in [ER06e](#) Appendix 3. Site constraints identified in [ER06a](#) Table 43 are the course of an old Roman Road runs through the northern section of the site, there is potential habitat for bats and birds within the site, there are trees and hedgerows on site and the site borders onto the Red Scar and Tun Brook Woods SSSI and the Tun Brook. These site constraints have been addressed by the approved outline and Reserved Matters planning applications. Further Reserved Matters planning applications for the remaining land parcels within the outline approval site would be required to address those relevant site constraints not addressed at outline approval stage.

The site constraints of EC3.3 were assessed in [ER06a](#), Table 43 (page 126) and scored in [ER06f](#) Appendix 4 using the site scoring system detailed in [ER06e](#) Appendix 3. Site constraints and off-site impacts of employment development of the employment land allocation have been taken into account through the planning application process and therefore the allocation of the site. Relevant planning history includes: -

- App Ref: 06/2023/0823, full planning permission approved 30/01/24 for demolition of existing farm buildings, creation of a spine road through the site with associated infrastructure, erection of drainage infrastructure and the

realignment of Roman Way. The application documentation includes a site access road existing layout and constraints plan.

- Outline planning permission App Ref: 06/2022/0745
- Reserved Matters App Ref: 06/2023/0844
- Reserved Matters App Ref: 06/2024/1260.

Site constraints were incorporated into the SHELAA methodology ([HO14a](#) SHELAA Main Report, paragraphs 2.4, 2.7, 2.11-2.13, 2.17-2.18, 2.22-2.23, 2.32-2.33, 2.36 and 3.6-3.10). Where constraints have been identified an assessment was made as to whether, when, and how they could be realistically overcome (i.e. potential actions / mitigation measures). Any assumptions made as regards how and when constraints could be overcome have been justified ([HO14a](#), SHELAA, paragraph 2.36).

The detailed Stage 2 SHELAA assessment covered other site constraints and any off-site impacts as identified in [HO14a](#) SHELAA paragraph 3.20. The findings of this are summarised in Preston site profile [HO14d](#), Appendix 6, Site Profile 23, Reference EC3.3: 11 Roman Road Farm.

In their Regulation 19 representations, United Utilities (UU) ([D15.13 Supp2](#)) raise that there are site-specific constraints (specifically a gravity sewer and a modelled sewer flood risk) not explicitly addressed in the KDCs. National Highways ([D16.13 Supp1](#)) do not comment on the site regarding the impact of the site on the strategic road network (SRN). The KDCs require early engagement with both UU and Highway Authorities to ensure appropriate mitigation, and the absence of explicit requirements within the KDCs enables full flexibility for site discussions and design.

Historic England in their representation to the Regulation 19 consultation D02.24 ([CD10](#)), requested that the KDCs for each employment land allocation within [CD01](#) Appendix 5, should reference the Heritage Impact Assessment (HIA) that has been completed by the Council. The CLAs consider this unnecessary because it is covered by Policy EN13(1(b)).

Natural England in their representation to the Regulation 19 consultation D26.05 ([CD10](#)) requested that Policy EC3.3 considers impacts to Red Scar and Tun Brook Woods SSSI. The CLAs response in [CD10](#) states this issue has been addressed at the outline planning application stage - the site has outline planning permission. The Plan [CD01](#) must be read as a whole, with relevant policies including EC7 in respect of avoiding impacts on SSSIs and EC3.3(3) on the requirement for a wintering bird survey alongside any planning application for site EC3.3 in accordance with Policy EC7.

Site constraints and off-site impacts are taken into consideration in [CD07](#) HRA – Screening and Appropriate Assessment (LUC, January 2025). Chapter 2 confirms the employment land allocations were assessed in the HRA. Tables C.1 and D.1 identify respectively whether the employment land allocations are located within functionally linked land buffers or within 500 metres of those buffers for each Habitats site. Tables E.1, E.2 and E.3 contain a review of site parameters and assess the suitability of those allocations to be functionally linked land for qualifying bird species of relevant SPA and Ramsar sites.

[CD05](#) Integrated Assessment of the CLLP: Pre-Submission Local Plan Final Report, Table 6.13, summarises the likely effects of the Policy EC3 Employment Land Allocations in Preston, with any off-site impacts assessed in further detail on page 193. The total effects of all the CLLP policies, including of the employment land allocations in Preston, are presented in Table 7.1. The cumulative effects of the CLLP (January 2025) are summarised in Table 7.2.

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

Yes. The SHELAA site assessments ([HO14d](#)) and Employment Land Study (EC06 (a-f)) identify the potential constraints for the site, and the CLLP KDCs (Appendix 5, [CD01](#)) set out the Council’s expectations for development to address the specified key considerations through subsequent planning applications. The evidence has concluded that site constraints are capable of being mitigated, and the necessary infrastructure provided, subject to early discussions with infrastructure and service providers. The KDCs confirm that planning obligations may also be required to help mitigate the impacts of the development.

Full planning permission App Ref: 06/2023/0823 was approved on 30/01/24 for demolition of existing farm buildings, creation of a spine road through the site with associated infrastructure, erection of drainage infrastructure and the realignment of Roman Way.

The site has outline planning permission App Ref: 06/2022/0745. It is understood that development of the spine road via App Ref: 06/2023/0823 has commenced and the first unit is likely to commence development in late autumn / winter 2025.

Reference should be made to the infrastructure section of Preston site profile [HO14d](#), Appendix 6, Site Profile 23, Reference EC3.3: 11 Roman Road Farm.

[ER06f](#) Appendix 4: Sites Scoring Results of the Employment Land Study – Land Supply and OAN Update (2024, BE Group) assesses proximity to the Strategic Road Network. This criterion is described in [ER06e](#) Appendix 3: Site Scoring System.

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

Yes. The deliverability of the Preston employment land allocations was assessed in evidence [ER06a](#), Table 55, by the BE Group, specifically on pages 171-172 concerning the 11 Roman Road Farm site. Site conditions of services availability, constraints, environmental setting and flexibility, which can affect viability, were scored in [ER06f](#) Appendix 4 by the BE Group, with these criteria described in [ER06e](#) Appendix 3: Site Scoring System.

The site has been assessed through the SHELAA (HO14a-e) and ELS (EC06) evidence to be developable, and no concerns around viability have been identified through the Viability Report ([CD13](#)).

The site, marketed as APTUS, has outline planning permission App Ref: 06/2022/0745 for employment use as identified in [ER06a](#) Table 55. Reserved Matters App No. 06/2023/0844 (2.68ha application site) mentioned in [ER06a](#) Table 55 was approved on 13/06/24, which is intended to be occupied by Kerakoll. Barnfield Construction are the developer. Reserved Matters application App Ref: 06/2024/1260 was approved on 06/03/25 at a 2.05ha site.

Preston site profile [HO14d](#), Appendix 6, Site Profile 23, Reference EC3.3: 11 Roman Road Farm indicates the site is viable and developable for employment use because it has outline planning permission for employment use.

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

It is considered there are no omissions in Policy EC3.3: 11 Roman Road Farm and that it is sufficiently flexible.

No concerns (other than those referred to in part (b) of our response on this EC3.3 site) have been raised through Regulation 19 representations and the CLAs do not consider that any changes are required to address these concerns.

### **EC3.4 Riversway, Maritime Way, Preston**

#### **a) Are the requirements set out in Policies EC3 clear, justified and effective?**

Yes. Policy EC3 clearly specifies the sites which are allocated and protected for employment land in Preston and clearly states that proposals meeting the accompanying KDCs set out within [CD01](#) Appendix 5, pages 250-251 for EC3.4, will be supported. Policy EC3 sets out the total site area of each employment land allocation in Preston, and the use classes appropriate in principle within each allocation.

The allocated sites have been identified through the SHELAA ([HO14a](#)) and the accompanying site profiles ([HO14d](#)) detail the assessments of each site. Site Profile 31 for the EC3.4 employment land allocation is provided at pages 93-96 of SHELAA Preston site profiles [HO14d](#), Appendix 6, which sets out site requirements in the Requirements (and Masterplan if applicable) section on pages 95-96.

The suitability and deliverability of potential employment sites have also been considered through the Employment Land Study (EC06a-f), with the site scoring system set out in Appendix 3 ([EC06e](#)) and assessments detailed in Appendix 4 ([EC06f](#)). Sites have therefore been selected for allocation based on their suitability and deliverability, taking into account all other reasonable alternatives of sites.

Policy EC3 is considered to be effective because the sites have been assessed as deliverable over the plan period and capable of contributing to the supply of employment land across the Central Lancashire area.

#### **b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

Yes. The Council's SHELAA ([HO14a](#)) and methodology ([HO14b](#)) set out how the Council have undertaken a land availability assessment for housing and economic uses. The SHELAA assesses the suitability of land for different uses, in accordance with national policy and guidance. A variety of information has been used in the assessments, including site constraints and off-site impacts. The Preston site proformas ([HO14d](#)) details those assessments. The EC3.4 site, Site Profile 31 of HO14d, (SHELAA Ref: 19P178) was concluded to be suitable, available, and achievable for employment development. It was found that all identified constraints are likely to be able to be mitigated and that the site is located in expanded Preston Urban Area (Tier 1 of the settlement hierarchy) where there is a good range of services and facilities.

Key Development Considerations for the EC3.4 site are set out in [CD01](#) CLLP Appendix 5, pages 250-251 and include mitigation measures around flood risk, designated sites for nature conservation (requirement for a wintering bird survey at planning application stage) and environmental quality. These considerations can be addressed through design and early engagement with infrastructure and service providers, to enable the delivery of the site. The site constraints of EC3.4 were assessed in [ER06a](#), Table 43 (pages 131-132) and scored in [ER06f](#) Appendix 4 using the site scoring system detailed in [ER06e](#) Appendix 3.

Historic England in their representation to the Regulation 19 consultation D02.24 ([CD10](#)), requested that the KDCs for each employment land allocation within CD01 Appendix 5, should reference the Heritage Impact Assessment (HIA) that has been completed by the Council. The CLAs consider this unnecessary because it is covered by Policy EN13(1(b)).

[CD05](#) Integrated Assessment of the CLLP: Pre-Submission Local Plan Final Report, Table 6.13, summarises the likely effects of the Policy EC3 Employment Land Allocations in Preston, with any off-site impacts assessed in further detail on page 193. The total effects of all the CLLP policies, including of the employment land allocations in Preston, are presented in Table 7.1. The cumulative effects of the CLLP (January 2025) are summarised in Table 7.2.

Site constraints were incorporated into the SHELAA methodology ([HO14a](#) SHELAA Main Report, paragraphs 2.4, 2.7, 2.11-2.13, 2.17-2.18, 2.22-2.23, 2.32-2.33, 2.36 and 3.6-3.10). Where constraints have been identified an assessment was made as to whether, when, and how they could be realistically overcome (i.e. potential actions / mitigation measures). Any assumptions made as regards how and when constraints could be overcome have been justified ([HO14a](#), SHELAA, paragraph 2.36).

The detailed Stage 2 SHELAA assessment covered other site constraints and any off-site impacts as identified in [HO14a](#) SHELAA paragraph 3.20. The findings of this are summarised in Preston site profile [HO14d](#), Appendix 6, Site Profile 31, Reference EC3.4: Riversway, Maritime Way.

Constraints and off-site impacts, including that on highways and the strategic road network (SRN) were also considered through the Employment Land Study (ELS) [ER06a](#), Table 43 (page 131-132 for EC3.4) and scored in [ER06f](#) Appendix 4 using the site scoring system detailed in [ER06e](#) Appendix 3. [ER06a](#) Table 43, pages 131-132 found although the site is constrained, the development of adjacent land for car dealerships suggests such constraints can be overcome. The land is owned by Preston City Council, allowing the Council to lead on and support employment development at the site.

In their Regulation 19 representations, United Utilities (UU) ([D15.13 Supp2](#)) raise that there are site-specific constraints (specifically a pressurised water main, gravity sewer and reservoir flood risk) not explicitly addressed in the KDCs, and National Highways ([D16.13 Supp1](#)) comment regarding the impact of the EC3.4 site on the strategic road network (SRN) M55 junction 2. The KDCs require early engagement with both UU and Highway Authorities to ensure appropriate mitigation, and the absence of explicit requirements within the KDCs enables full flexibility for site discussions and design.

In their Regulation 19 representations, National Grid Electricity Transmission (D05.6, [CD10](#)) raise that there is a National Grid Overhead Cable Route within the site and refers to their National Grid Design Guide and Principles; raising that this site-specific constraint has not been explicitly addressed in Policy EC3.4. National Grid is not a statutory consultee in the planning application process. However, given the Overhead Cable Route within the site, it is expected that National Grid will be consulted on planning applications at the site during the usual Development Management process.

Consequently, it is unnecessary to reference this specific requirement in the policy. Site constraints and off-site impacts are taken into consideration in [CD07](#) HRA – Screening and Appropriate Assessment (LUC, January 2025). Chapter 2 confirms the employment land allocations were assessed in the HRA. Tables C.1 and D.1 identify respectively whether the employment land allocations are located within functionally linked land buffers or within 500 metres of those buffers for each Habitats site. Tables E.1, E.2 and E.3 contain a review of site parameters and assess the suitability of those allocations to be functionally linked land for qualifying bird species of relevant SPA and Ramsar sites.

Please refer to the response to matter 2.4 regarding the SHELAA site selection process.

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

Yes. The SHELAA site assessments ([HO14d](#)) and Employment Land Study (EC06 (a-f)) identify the potential constraints for the site, and the CLLP KDCs (Appendix 5, [CD01](#)) set out the Council's expectations for development to address the specified key considerations through subsequent planning applications. The evidence has concluded that site constraints are capable of being mitigated, and the necessary infrastructure provided, subject to early discussions with infrastructure and service providers. The KDCs confirm that planning obligations may also be required to help mitigate the impacts of the development.

Reference should be made to the Key Development Considerations for the EC3.4 site in [CD01](#) CLLP Appendix 5, pages 250-251 and in the infrastructure section of Preston site profile [HO14d](#), Appendix 6, Site Profile 31, Reference EC3.4: Riversway, Maritime Way.

[ER06f](#) Appendix 4: Sites Scoring Results of the Employment Land Study – Land Supply and OAN Update (2024, BE Group) assesses proximity to the Strategic Road Network. This criterion is described in [ER06e](#) Appendix 3: Site Scoring System.

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

Yes. The deliverability of the Preston employment land allocations was assessed in evidence [ER06a](#), Table 55, by the BE Group. Site conditions of services availability, constraints, environmental setting and flexibility, which can affect viability, were scored in [ER06f](#) Appendix 4 by the BE Group, with these criteria described in [ER06e](#) Appendix 3: Site Scoring System.

SHELAA Preston Site Profiles [HO14d](#), Appendix 6, Site Profile 31, Reference EC3.4: Riversway, Maritime Way found the site is achievable. The site has been assessed through the SHELAA (HO14a-e) and ELS (EC06) evidence to be developable, and no concerns around viability have been identified through the Viability Report ([CD13](#)).

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

It is considered there are no omissions in Policy EC3.4: Riversway, Maritime Way and that it is sufficiently flexible to guide development of the site.

No concerns (other than those referred to in part (b) of our response on this EC3.4 site) have been raised through Regulation 19 representations and the CLAs do not consider that any changes are required to address these concerns.

## **SOUTH RIBBLE**

### **EC4.1 Land North of Lancashire Business Park**

#### **a) Are the requirements set out in Policies EC4 clear, justified and effective?**

Yes. Policy EC4 clearly specifies the sites which are allocated and protected for employment land in South Ribble and clearly states that proposals meeting the accompanying KDCs set out within Appendix 5 of the CLLP will be supported.

The allocated sites have been identified through the SHELAA ([HO14a](#)) and the accompanying site profiles ([HO14e](#)) detail the assessments of each site. The suitability and deliverability of potential employment sites have also been considered through the Employment Land Study (EC06), with the site scoring system set out in Appendix 3 ([EC06e](#)) and assessments detailed in Appendix 4 ([EC06f](#)). Sites have therefore been selected for allocation based on their suitability and deliverability, taking into account all other reasonable alternative sites.

Policy EC4 is considered to be effective because the sites have been assessed as deliverable over the plan period and capable of contributing to the supply of employment land across the Central Lancashire area.

#### **b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

Yes. The CLA's SHELAA (H014a) and methodology ([HO14b](#)) set out how the CLAs have undertaken a land availability assessment for housing and economic uses. The SHELAA assesses the suitability of land for different uses, in accordance with national policy and guidance. A variety of information has been used in the assessments, including site constraints and off-site impacts. The South Ribble site proformas ([HO14e](#)) detail those assessments.

Through the SHELAA, the Land north of Lancashire Business Park (EC4.1) was concluded to be suitable, available, and achievable for development, and the assessments noted the site has few constraints. Those potential impacts that have been identified are reflected in the KDCs for the site (CLLP, Appendix 5 ([CD01](#))), and include mitigation measures around flood risk, drainage, and highways. As the KDCs state, it is considered that these can be addressed through design and early engagement with infrastructure and service providers, to enable the delivery of the site.

Constraints and off-site impacts, including that on highways and the strategic road network (SRN) were also considered through the Employment Land Study (ELS) (ER06), and the scoring can be viewed through [Appendix EC6f](#). The ELS identified constraints relating to trees, a small pond on site, and possible flood risk – which the KDCs for EC4.1 address.

The potential significance of impacts from development of the site were also considered through the Central Lancashire Integrated Assessment ([RD03](#)), with South Ribble site assessments detailed in [Appendix B2](#). The HRA ([CD07](#)) also assessed the impact of development of the site on SPA and Ramsar sites and concluded any potential impacts to be negligible.

In their Regulation 19 representations, United Utilities (UU) ([D15.13\\_Supp2](#)) raise that there are site-specific constraints (specifically a gravity sewer, and some flood risk) not explicitly addressed in the KDCs, and National Highways ([D16.13\\_Supp1](#)) comment regarding the impact of the site on the strategic road network (SRN). The KDCs require early engagement with both UU and Highway Authorities to ensure appropriate mitigation, and the absence of explicit requirements within the KDCs enables full flexibility for site discussions and design.

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

Yes. The SHELAA site assessments ([HO14e](#)) and Employment Land Study (EC06 (a-f)) identify the potential constraints for the site, and the CLLP KDCs (Appendix 5, [CD01](#)) set out the CLA's expectations for development to address the specified key considerations through subsequent planning applications. The evidence has concluded that site constraints are capable of being mitigated, and the necessary infrastructure provided, subject to early discussions with infrastructure and service providers. The KDCs confirm that planning obligations may also be required to help mitigate the impacts of the development.

The KDCs note that the A582 roundabout suffers from congestion. LCC are developing [improvements to the A582](#) to reduce congestion and improve journey times along the A582 between the M65 and Preston. In January 2025, LCC approved funding towards a business case and the use of compulsory purchase land needed for a new junction configuration to replace the two roundabouts at Croston Road. In March 2025, LCC submitted a planning application ([LCC/2025/0008](#)) for the junction works, which currently remains undetermined. The proposed site plan indicates that land west of the River Lostock will be used to provide a new junction and so will utilise some of the

allocation land that lies to the west of the river. However, the KDCs already note that approximately one third of the site to either side of the main river is flood zone 2 or 3, and that flood risk/areas should be managed through careful consideration of site design. For that reason, it is not considered that the proposed junction changes should impact delivery of the allocation, but the junction changes will help address congestion issues currently identified as a site constraint.

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

Yes. The site has been assessed through the SHELAA (HO14) and ELS (EC06) evidence to be developable, and no concerns around viability have been identified through the Viability Report ([CD13](#)).

Through their Regulation 19 representation ([B53](#)), the site owner (Leyland Trucks) registered their support for the EC4.1 allocation, confirming the site is under the control of Leyland Trucks and is part of their long-term strategy for expansion and improvement, and so essential to the future success of the business.

Regulation 19 representation [A36.3 Supp1](#) (Logik), argues that as the site is for the expansion of Leyland Trucks, the land is not freely available in the market. However, the ELS (EC06) identifies an employment OAN irrespective of land ownership and this site forms part of the identified supply to meet that need. The ELS assessments (EC06, page 175) confirm that whilst the ownership is likely to be held for Leyland Trucks, it could be made available to other occupiers.

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

It is not considered that there are any omissions, and the policies / KDCs are sufficiently flexible.

Regulation 19 representations highlighted concerns that i) the area of the allocation should be reduced to take into account land affected by watercourse / flood risk issues ([A37.2](#)); and ii) a Flood Risk Assessment should be included in the KDCs ([D19.7](#)). The CLAs consider that Policy EC4 / the KDCs, as drafted, are sufficiently flexible. The KDC for flood risk refers to the ability for the site boundary to be redrawn to eliminate water risk areas, or to incorporate it into the design as greenspace, and the requirement for a Flood Risk Assessment is set separately through policy EN10.

Representation A31.13 makes no specific comments on EC4 sites other than stating they believe there is an insufficient supply of employment land and identified sites are not suitable or capable to meet need. The CLAs disagree with this for the reasons detailed through these responses that confirm the site to be developable and deliverable. Their comments object to the omission of their promoted site, rather than relating to an omission of the policy itself.

## **EC4.2 Land at Leyland Business Park, Farington**

### **a) Are the requirements set out in Policies EC4 clear, justified, and effective?**

Yes. Policy EC4 clearly specifies the sites which are allocated and protected for employment land in South Ribble and clearly states that proposals meeting the accompanying KDCs set out within Appendix 5 will be supported.

The allocated sites have been identified through the SHELAA ([HO14a](#)) and the accompanying site profiles ([HO14e](#)) detail the assessments of each site. The suitability and deliverability of potential employment sites have also been considered through the Employment Land Study (EC06), with the site scoring system set out in Appendix 3 ([EC06e](#)) and assessments detailed in Appendix 4 ([EC06f](#)). Sites have therefore been selected for allocation based on their suitability and deliverability, taking into account all other reasonable alternative sites.

Policy EC4 is considered to be effective because the sites have been assessed as deliverable over the plan period and capable of contributing to the supply of employment land across the Central Lancashire area.

### **b) Have the site constraints and off-site impacts been appropriately taken into account in the allocation of the site?**

Yes. The CLA's SHELAA ([HO14a](#)) and methodology ([HO14b](#)) set out how the CLAs have undertaken a land availability assessment for housing and economic uses. The SHELAA assesses the suitability of land for different uses, in accordance with national policy and guidance. A variety of information has been used in the assessments, including site constraints and off-site impacts. The South Ribble site proformas ([HO14e](#)) detail those assessments.

The EC4.2 site, Land adjacent to Leyland Business Park (SHELAA Ref 19S190), was concluded to be suitable, available, and achievable for development, and the assessments noted the site has no / very minimal constraints. The KDCs for the site are

set out in CLLP Appendix 5 ([CD01](#)), and include mitigation measures around flood risk, drainage, and highways. As the KDCs state, these considerations can be addressed through design and early engagement with infrastructure and service providers, to enable the delivery of the site.

Constraints and off-site impacts, including that on highways and the strategic road network (SRN) were considered through the Employment Land Study (ELS) (ER06), and the scoring can be viewed through [Appendix EC6f](#). The ELS did not identify any significant constraints for the site.

The potential significance of impacts from development of the site were also considered through the Central Lancashire Integrated Assessment ([RD03](#)), with South Ribble site assessments detailed in [Appendix B2](#). The HRA ([CD07](#)) also assessed the impact of development of the site on SPA and Ramsar sites and concluded any potential impacts to be negligible.

In their Regulation 19 representations, United Utilities (UU) ([D15.13 Supp2](#)) raise that there are site-specific constraints (specifically a pressurised water main) not explicitly addressed in the KDCs, and National Highways ([D16.13 Supp1](#)) comment regarding the impact of the site on the strategic road network (SRN). The KDCs require early engagement with both UU and Highway Authorities to ensure appropriate mitigation, and the absence of explicit requirements within the KDCs enables full flexibility for site discussions and design.

**c) Is there robust evidence that the assumptions regarding the infrastructure required for development are realistic and that it will be deliverable?**

Yes. The SHELAA site assessments ([HO14e](#)) and Employment Land Study (EC06 (a-f)) identify the potential constraints for the site, and the CLLP KDCs (Appendix 5, [CD01](#)) set out the CLA's expectations for development to address the specified key considerations through subsequent planning applications. The evidence has concluded that site constraints are capable of being mitigated, and the necessary infrastructure provided, subject to early discussions with infrastructure and service providers. The KDCs confirm that planning obligations may also be required to help mitigate the impacts of the development.

**d) Is there evidence that the development of the allocation is viable and developable during the plan period?**

Yes. The site has been assessed through the SHELAA (HO14) and ELS (EC06) evidence to be developable, and no concerns around viability have been identified through the Viability Report ([CD13](#)).

The site is let to Ainscough Cranes and is currently in use for open storage and the parking of cranes, but remains available for development (ELS ([EC06a](#)), page 141-142).

**e) Are there any omissions in the policies, and are they sufficiently flexible?**

It is not considered that there are any omissions in the policies, and they are sufficiently flexible to guide development of the site.

No concerns (other than those referred to in part (b) of our response on this EC4.2 site) have been raised through Regulation 19 representations.

Representation A31.13 makes no specific comments on EC4 sites other than stating they believe there is an insufficient supply of employment land and identified sites are not suitable or capable to meet need. The CLAs disagree with this for the reasons detailed through these responses that confirm the site to be developable and deliverable. Their comments object to the omission of their promoted site, rather than relating to an omission of the policy itself.

**9.3 What is the identified supply figure of new business and industrial development land within the Plan? What factors were taken into account in how it has been distributed across the Plan area? Taken in the round, does the identified supply make appropriate provision for the future employment needs within the three Authorities for the Plan Period?**

The identified employment land supply figure within the Plan by each CLA and by use class is identified in the table below:

	Office Class E(g)	B2 / B8 use	Requirement Office + B2/B8	Supply: Total Allocations	Supply: Total Allocations + Windfall	Total Supply: Completions + Total Allocations + Windfall	Total supply - Requirement
Totals	18.24	154.63	172.87	217.38	332.54	357.63	184.76
<b>CBC</b>	6.48	34.97	41.45	19.58	29.39	40.82	<b>-0.63</b>
<b>PCC</b>	6	68.43	74.43	136.5	193.99	204.04	<b>129.61</b>
<b>SR</b>	5.76	51.23	56.99	61.3	109.16	112.77	<b>55.78</b>

At the point of submission, all districts were able to demonstrate a supply in excess of the OAN requirement. As detailed in answer to question 9.2 e) however, it is now necessary to withdraw Chorley's allocation EC2.2 Former Gas Works, Bengal Street. This will leave Chorley with a marginal supply shortfall of less than a hectare.

Taken in the round however, the identified supply makes appropriate provision for the future employment needs within the CLAs for the Plan Period, as the table above shows that this negligible shortfall is offset by the net supply from Preston and South Ribble. Furthermore, the data above does not contain a windfall allowance. It is reasonable to expect some small windfall employment developments over the plan period.