



# Central Lancashire Local Plan 2023-2041

## Hearing Statement

on behalf of Maple Grove Developments

Matters 8 and 9 – Employment Land Need and Allocations

Representor: Maple Grove Developments

Representor ID: A37

November 2025

### Relevant Site:

Land at Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way,  
PR26 6PH

(Site Reference: CLCFS00414 / SHLAA Reference: 19S119)

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## 1. Introduction

- 1.1 This Statement has been prepared by Hive Land & Planning on behalf of Maple Grove Developments and responds to the Matters, Issues and Questions released by the Inspectors on the 9<sup>th</sup> October 2025.
- 1.2 This Hearing Statement relates to **Matters 8 and 9**, which is consistent with the nature of comments submitted by Maple Grove Developments at each consultation stage.
- 1.3 Maple Grove Developments are participating in the Examination as they are promoting land at Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH (SHELAA reference: 19S119). A Development Statement related to this Site was provided at Appendix 1 to our Regulation 19 consultation response, which provides more details of the future development potential of the Site, demonstrating that it is deliverable and a sustainable location towards which new employment development should be directed.
- 1.4 We trust that this Statement assists the Inspectors in respect of the Examination.

## 2. Issue 1: Are the provisions of the plan in relation to the provision of employment land justified and consistent with national policy?

*Q8.1. 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?*

- 2.1 No, Maple Grove consider that the Employment Land Need figure is not justified and the assumptions and methodology are not soundly based.
- 2.2 The Employment Land Study (2022) originally identified a need of 225 hectares across Central Lancashire, including 77.6 hectares for South Ribble. The reduction to 172.87 hectares in the 2024 update is attributed to a revised assessment period and a shift to a 'Policy Off' methodology, which excludes major public sector programmes and economic growth ambitions.
- 2.3 This approach and the identified employment land need figure is unambitious and fails to set a clear economic growth vision which positively, and proactively encourages sustainable economic growth having regard to Local Industrial Strategies and other local policies for economic development and regeneration in line with Paragraphs 85 and 86 of the NPPF (2023).
- 2.4 Notably, the strategy fails to reflect the economic growth agenda of the Lancashire Combined County Authority and the Lancashire Growth Plan (2025–2035).
- 2.5 Despite the OAN reflecting an unambitious, baseline position of potential employment needs and not seeking to drive economic growth across the region, the Employment Land Study does highlight the strong market for new employment growth and supply shortages in the region.
- 2.6 Overall, it is considered that Policy EC1 and the identified employment land need is not positively prepared, effective or justified by national policy.
- 2.7 Furthermore, it is concerning that the total land supply identified across all employment and mixed-use allocations in Policies EC2-6 is 154.84ha, and therefore does not identify enough employment land to meet the identified OAN of 173ha in Policy EC1.
- 2.8 Further detailed commentary is set out in our Regulation 19 consultation response.

*Q8.2. 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 Authorities? What is the resulting “shortfall” that the Plan seeks to address for the Plan period?*

- 2.9 The conclusions in relation to the employment land supply are not soundly based.
- 2.10 It is evident that the Local Plan fails to allocate sufficient employment land to meet the identified OAN of 173ha, and this is exacerbated due to concerns around the realistically available and deliverable capacity of the identified employment land with proposed allocations in Policies EC2-6.
- 2.11 Therefore, further deliverable employment land allocations are required across the CLLP area and particularly in locations identified as suitable and sustainable for employment development such as, 'Farington Moss: Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH' which was previously allocated in the Preferred Options document under reference: SR/EP1.3).
- 2.12 There are also concerns regarding the employment allocation site selection process, whereby it would appear that the Council has placed greater importance on avoiding Green Belt release rather than meeting the recognised employment land needs and directing development to the most suitable, sustainable and deliverable locations.
- 2.13 This is explored further in relation to Issue 9 and within our Regulation 19 consultation representations.

### 3. Issue 9: Are the proposed employment allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

*Q9.1. How were employment sites selected? In particular:*

- What factors led to their allocation?*
- Are they based on up-to-date evidence?*
- Were they selected in comparison with possible alternatives using a robust and objective process?*
- 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?*
- What account has been taken of regional and national growth strategies in determining employment need?*

- 3.1 There are significant concerns regarding the robustness of the site selection process and it is considered that the Council has placed greater importance on avoiding Green Belt release rather than meeting recognised employment land needs and directing development to the most sustainable locations.
- 3.2 The SHELAA profile for Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way (SHELAA reference: 19S119) notes that the site has been withdrawn as an employment allocation (previously identified as a 'Preferred Allocation') due to 'sufficient employment provision has been allocated outside the Green Belt'.
- 3.3 Yet, as discussed throughout this statement and supporting Regulation 19 consultation representation, Policies EC1-6 do not allocate sufficient employment land supply to meet the identified OAN.
- 3.4 Furthermore, whilst transport evidence has now been published to support the Local Plan prior to Examination in Public hearing sessions, this information was not available during the Regulation 19 consultation. The primary purpose of an evidence base is to support and justify what is in the Local Plan with the plan avoiding assertions of fact that are not supported by evidence, nor should evidence be collected retrospectively in an attempt to justify pre-conceived conclusions. It cannot be determined that the most suitable sites have been selected as the evidence base has not been published to support a full

and comprehensive assessment of the spatial strategy options and site selection processes., nor has the Integrated Assessment been updated to reflect the latest transport modelling information.

- 3.5 Therefore, it cannot be considered to be positive, effective nor justified to withdraw preferred allocations, such as Farington Moss, Land at Lodge Lane, Flensburg Way and Penwortham Way (SHELAA reference: 19S119) when have been deemed to be suitable and show 'significant positive effects for the economy' alongside the Plan outlining a shortfall in employment land supply.
- 3.6 The Plan does not adequately deliver the employment land needs of each authority area with substantial supply shortfalls against the identified need for the authorities, notably within South Ribble. The Employment Land Study 2024 notes that there is a requirement for an additional 25.68 ha of land supply in South Ribble, yet only 11.30 ha has been allocated in the Local Plan.
- 3.7 Therefore, the economic and employment land strategy cannot be considered to be justified, positively prepared or effective.
- 3.8 Concerns around the soundness of this strategy are exacerbated when it is highlighted that there are available, suitable and deliverable sites, within South Ribble, which have been considered to be appropriate and show significant effects for the economy but ultimately not allocated as they are within Green Belt.

*Q9.2 In relation to the following sites:*

- *EC2.1 Land East of the M61, Chorley*
- *EC2.2 Former Gas Works, Bengal Street, Chorley*
- *EC3.1 Former Alstom Works and Wider Site, Channel Way, Preston*
- *EC3.2 Preston East Junction 31A M6 - EC3.3 11 Roman Road Farm*
- *EC3.4 Riversway, Maritime Way, Preston*
- *EC4.1 Land North of Lancashire Business Park*
- *EC4.2 Land at Leyland Business Park, Farington*

*a) Are the requirements set out in Policies EC2, EC3 and EC4 clear, justified and effective?*

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

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

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

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

3.9 The following is MGD's response to Q9.2 a) to e) combined.

3.10 There are significant concerns regarding the robustness of the site selection process and it is considered that the Council has placed greater importance on avoiding Green Belt release rather than meeting recognised employment land needs and directing development to the most sustainable locations. Furthermore, a comprehensive assessment of Sites cannot have been undertaken prior to submission of the Local Plan, as not all evidence, including transport, was available.

3.11 As highlighted in our Regulation 19 representations, concerns have been raised in regard to the proposed deliverability and/or capacity of proposed employment allocations which has an impact on the overall employment land supply figure, further highlighting that additional allocations are required to meet the OAN. Maple Grove highlighted that there are concerns around whether several sites are realistically deliverable or can accommodate the proposed development capacities set out in the CLLP, including EC4.1 and EC6.1.

3.12 In addition to these, Maple Grove highlight concerns regarding the suitability, availability and deliverability of the following sites:

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

3.13 EC2.1 was previously allocated in the Chorley Local Plan (2015) under reference EP1.3 for 6.90 hectares of employment land (Use Classes B1, B2 and B8). However, no planning application for employment uses on the site has been forthcoming and an application for the 'prior extraction of sand / gravel and subsequent restoration with inert engineering fill to facilitate a platform for employment development or agriculture with peripheral landscaping' was withdrawn in 2024.

- 3.14 It is also understood that the site is not controlled by a developer or promoter.
- 3.15 Therefore, the site cannot be considered to be available for development and there is no clear evidence demonstrating that the site is realistically deliverable or developable within the plan period. It is not justified for the CLLP to just roll forward allocations identified in previous local plan(s). Indeed, paragraph 126 of the NPPF (2023) highlights that planning policies need to reflect changes in the demand for land, informed by regular reviews of both the land allocated for development in plans and of land availability. Indeed, when there is no reasonable prospect of an application coming forward for the use allocated in a plan, alternative strategies should be considered.

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

- 3.16 EC2.2 site has significant remediation requirements associated with its former use as a gas works, whereby it is understood that the two former gas holder voids remain unfilled, significantly affecting the viability of any proposed scheme.
- 3.17 The Site was marketed in 2023 and it is understood that there was no deal completed due to the viability issues. It is therefore considered that the site cannot be considered to be available or realistically deliverable to meet the employment land requirements in the CLLP.

### **EC3.1 Former Alstom Works and Wider Site**

- 3.18 Policy EC3.1 allocates the former Alstom Works for 6.35ha of employment land with key development considerations identified in Appendix 5.
- 3.19 The site comprises a Victorian multi storey former rail factory and therefore demolition will likely be required to facilitate any proposed employment development on the site. In addition, the CLLP highlights potential heritage and archaeological assets on the site and the need for assessment and mitigation, whilst there are gas distribution pipes and buffer/HSE risk zone alongside the southwestern boundary of the site.
- 3.20 It is therefore considered that any redevelopment of EC3.1 will have significant costs associated with demolition, remediation and constraint mitigation which may impact viability. Notwithstanding this, the facilitation works required, mean that there is no certainty around potential timescales to deliver the Site for employment uses.

## Summary

3.21 Maple Grove have significant concerns in regard to the proposed deliverability and/or capacity of proposed employment allocations which has an impact on the CLLP's ability to deliver the identified employment land requirement. Therefore, additional available, deliverable and viable employment allocations, such as 'Farington Moss: Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH' which was previously allocated in the Preferred Options document under reference: SR/EP1.3) are required to present an effective and sound strategy for meeting employment needs across the region.

*Q9.3 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?*

3.22 The total land supply identified across all employment and mixed-use allocations in Policies EC2-6 is 154.84ha, and therefore, does not identify enough employment land to meet the identified OAN of 173ha in Policy EC1.

3.23 The OAN reflects an unambitious, baseline position of potential employment needs and does not seek to drive economic growth across the region, in line with the growth agenda of the Lancashire Combined County Authority and the Lancashire Growth Plan (2025–2035).

3.24 It is considered that Policy EC1 and the identified employment land need is not positively prepared, effective or justified by national policy, and therefore is unsound.

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