

Central Lancashire Local Plan Examination - Matter 8 Hearing Statement

Produced by : Darren Wisler, Wisler Consulting on behalf of **Logik Strategic Land**
Associated Reg 19 Submission Reference : ID A36 Neil Lucas

Date : November 2025

Context

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

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?

- 1.6 The main method utilised by the BE Group to arrive at 173 hectares – the past take up approach - is an appropriate method for quantifying need.
- 1.7 That said, there are two major flaws in the way this general approach has been applied in Central Lancashire:
 - First, there has been a flawed, last-minute adjustment from a gross to net projection technique that serves to artificially reduce the overall need in South Ribble by 20 hectares, and in Chorley by 35 hectares.
 - Second, the past take-up method does not account for need arising from one-off transformational projects. This is of relevance to the assessment of overall need in South Ribble, given the presence of the National Cyber Force (NCF) project. The BE Group recognise this weakness in the past take up approach, but do not rectify it by adding in an extra allowance in their need assessment.

1.8 We deal with each of these two issues in turn.

Flawed Adjustment in South Ribble (and Chorley)

1.9 One of the main recognised benefits of the past take up approach, especially one based on the extrapolation of long-term trends, is that it gives a consistent measurement of future needs that does not jump around each time the measurement exercise is repeated. It is this consistency that leads to its popularity as a forecasting technique.

1.10 Given this context the result of the latest BE Group assessment which underpins the 173-hectare need¹ is bizarre to say the least.

1.11 The BE Group produced four comprehensive written reports in 2017, 2019, 2022 and most recently in February 2025. The BE Group use a largely consistent methodology to assess employment land need throughout their first three reports in 2017, 2019 and 2022, with their preferred method being a projection based on past gross employment land take up.

1.12 The evidence within the first three reports is for a future requirement of circa 4.5 hectares of employment land per annum in South Ribble. Whilst the forecasting periods have fluctuated, the estimated land requirement per annum has remained extremely consistent. On this basis, the 2002 report - which forecast over a 17-year period – outlined a requirement for 77 hectares of land in South Ribble.

1.13 The BE Group then make a very curious change to their approach for the purposes of their February 2025 report. The change has the effect of substantially reducing the OAN for employment land in both South Ribble and in neighbouring Chorley. In South Ribble the reduction in the total need for employment land is 20 hectares, with total need for the plan period reducing from 77 hectares in the 2022 report to 57 hectares in the 2025 report – **a huge 25% reduction**.

1.14 Nothing has changed in terms of market dynamics to justify this reduction. Various stakeholders point to continued need for B2 and B8 space with no dilution relative to the needs of the past. In fact, the BE Group themselves testify to this ongoing healthy demand in their 2025 assessment:

- *" In spite of ongoing macro-economic uncertainty in 2023, and the risk of a poor economic recovery, if not a recession, in the near future, the industrial market is proving highly resilient". (para 2.52)*
- *" Nationally, the industrial market has seen continuing requirements from manufacturers for new build high grade space, both from local firms and larger companies seeking to re-shore and safeguard their supply chains within the UK". (para 2.52)*
- *" If development constraints occur [in the industrial market], they are more likely to come from the supply side than the demand side". (para 2.54)*
- *" After three years of record breaking take up, stakeholders expect transaction rates in 2023 to be more moderate, but still well above the 10-year average. While reduced consumer spending may inhibit demand from retailers moving forward, logistics requirements are now coming from an increasingly diverse range of occupiers. Most prominent over the next few years will be third party logistics operators, who serve other businesses". (para 2.57)*

1.15 In addition, nothing has changed in terms of guidance on how to conduct employment land reviews to justify the reduction.

1.16 The BE Group only make their methodological change in respect of South Ribble and Chorley. The approach for Preston remains unchanged and largely consistent with previous approaches in the earlier BE Group reports. There is no justification for different methodologies in different component areas. The approach to assessing housing need in the Local Plan is consistent across all sub-areas and so should be the approach for employment land.

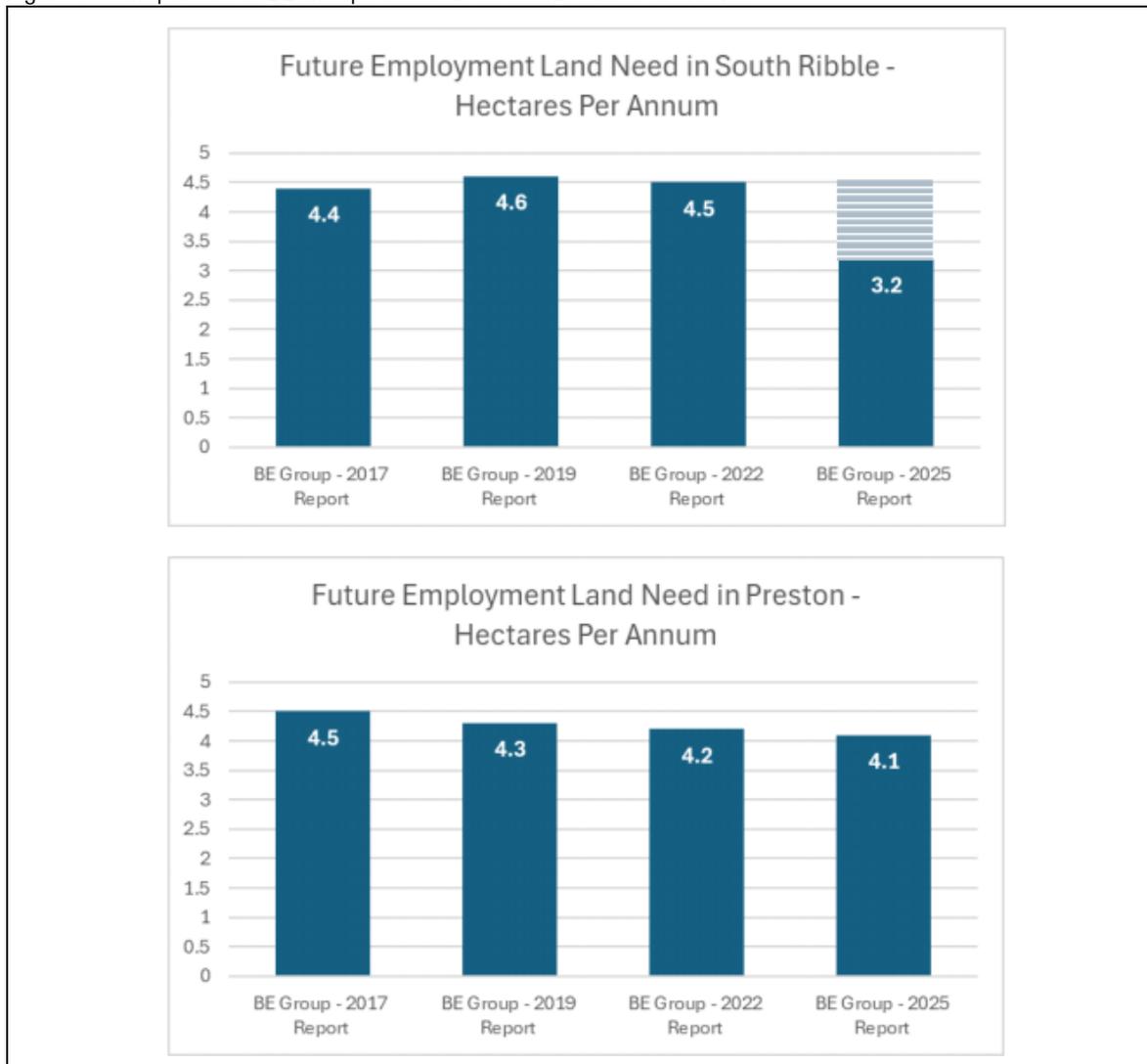
¹ Central Lancashire Employment Land Study – Land Supply and OAN Update 2024. Dated February 2025. BE Group.

1.17 The change is shown visually in Figure 1 below.

1.18 The 25% reduction in need is simply not justified. The two arithmetical changes made by the BE Group to effect this change are as follows, and both are deeply flawed:

- The first change is to move the OAN projection method from one based on gross past take up to one based on net past take up. The gross take up method was used in each of the 2017, 2019 and 2022 reports, but net take up in 2025. The net approach subtracts employment land losses each year from gross take up and uses the resultant number to project forward. The flaw with this approach is that these losses invariably relate to sites that were long since vacated and have normally been tested thoroughly, and over many years, as to their future suitability for employment land. The sites that are lost are, in the main, historic sites that have nothing to do with gauging current and future levels of need. Netting off these losses just serves to artificially deflate the true measure of current/future need.
- The second change, put in place because of the desire to incorporate net take up, is to reduce the period on which past take up is measured from circa 30 years to 13 years. Losses are only measured more recently which mean that the BE Group has had to deviate from its previous approach of charting past take up over an extended period. This change matters because the reduced 13-year period is more influenced by short term trends and shows lower take up rates than the longer period. In extrapolating past trends, a longer rather than shorter run of data should always be used as it is statistically more robust.

Figure 1 - Comparison of BE Group Forecasts for South Ribble & Preston



Source : Wisher Consulting/BE Group Studies. Hatched bar shows the flawed 25% reduction in South Ribble.

- 1.19 The changes outlined above run counter to how the BE Group generally conduct their assessments. The BE Group have undertaken over 50 employment land reviews in the last 15 years, according to their own marketing materials. Wisser Consulting has seen many of these reports and estimate that virtually all of these previous reports, maybe even 100%, use the gross take up method and adopt a long time series for the purposes of measuring take up trends. The approach in their 2025 report is an anomaly.
- 1.20 In conclusion, the 4.5 hectares per annum of need in South Ribble should be used in preference to the 3.2 hectares per annum. There is therefore a need for **81 hectares** of employment land in South Ribble over the 18-year Local Plan period of 2023 to 2041, based on past take-up trends.
- 1.21 Whilst Logik Strategic Land's primary interest is on the need figure for South Ribble, it is also worth pointing out that the same last-minute changes were also made in respect of Chorley.
- 1.22 In Chorley, the scale of the reduction between the 2022 and 2025 BE Group studies was 35 hectares – reducing from a 17-year need of 76.3 hectares in the 2022 study to an 18-year need of 41.4 hectares in the 2025 study. If the annual requirement utilised in the 2022 study is reverted to, then the 18-year need in Chorley increases back up to 81 hectares.
- 1.23 The overall effect of reverting back to the more reliable 2022-trend based analysis is to increase the overall need for employment land across the whole plan area from 173 hectares to **236 hectares**. The increase is due to the correct methodologies being reinstated for both South Ribble and Chorley.

No Allowance for Transformational/Strategic Need

- 1.24 The past take-up method of estimating future employment land needs is very much a 'business as usual' or 'policy off' approach – and does not include land needs emerging from one-off transformational projects such as the National Cyber Force Campus.
- 1.25 Nothing like the National Cyber Force Campus has occurred in South Ribble/Central Lancashire in recent times and as such the effects of a major project like this will not be apparent in past take up trends.
- 1.26 This methodological point is repeated very clearly by the BE Group in their various reports for South Ribble Borough Council, for example:
"The methods discussed above (i.e. past trends) are 'Policy Off' in that they make no allowance for any major public sector programmes which might generate jobs above the baseline" (p66, February 2025 Employment Needs Assessment).
- 1.27 The BE Group recognise that the transformational needs attached to NCF are not accommodated in their need assessment but do not attempt to rectify this by adding in an appropriate allowance. It is crucial this omission is rectified.
- 1.28 The opportunity to create associated employment on the back of NCF has been articulated very well by the pro-vice chancellor for research and enterprise at the University of Central Lancashire, Professor St John Crean, who stated that:
"When you get something as influential as the National Cyber Force coming to Lancashire, setting up a huge security-based operation, suddenly you're going to become very attractive to the cyber security arena and all its adjuncts"
"Lancashire has an opportunity to build an ecosystem – a connected set of businesses that have direct reliance on the cyber world – but also the wraparound services like project management, legal and ethics and accounting.... We want to have a cyber workforce based in Lancashire, not commuting from outside the region"
- 1.29 It is clear that all key partners and stakeholders see NCF as a one-off transformational project with wider cluster development potential, and that this cluster potential will be multi-faceted.
- 1.30 In the absence of any quantification of land need from the BE Group for NCF related need, we have estimated below what an appropriate land allowance might be for the benefit of the inspectors.

Quantification of NCF Transformational Need – Our Assessment

- 1.31 Land that is required for NCFs direct operations is all assumed to be accommodated on site at the Samlesbury EZ where a new campus is being developed, and which will apparently absorb most of the remaining space at the EZ.
- 1.32 There are additional land needs over and above those related to direct operations to cater for:
- The *indirect* job creation that has been predicted for NCF. Indirect jobs are those created in the NCF supply chain and those created in businesses benefitting from NCF staff spend.
 - The *wider job creation* from business who want to be located as part of the South Ribble cyber cluster – for the purposes of knowledge and innovation spillovers – but are not direct NCF suppliers.
- 1.33 There is no prescribed method for quantifying the additional employment land needed for these NCF-related occupiers. A starting point however is to consider the land use implications of the estimated levels of indirect job creation for NCF.
- 1.34 NCF job estimates have been provided for Lancashire County Council and its partners by Plexal and there are several studies of the wider jobs impact of major public-sector campuses in the public domain².
- 1.35 On the basis of this evidence, it is estimated there will be up-to 1,500 indirect jobs created as a result of NCF and the majority of these are expected to be in and around South Ribble. Using the job to land conversion factors in the Council’s BE Group report these indirect jobs will equate to a land need of nearly 14 hectares.
- 1.36 The 14-hectare figure relates to just indirect jobs. Other jobs/businesses will also come to South Ribble even if they are not suppliers, to be part of the local cluster in order to benefit from technology and knowledge spillovers. This additional demand could be significant and it is highly likely that the total land needed for NCF-related employment could exceed 20 hectares, over and above the land at Samlesbury EZ.
- 1.37 The location of this NCF-related land is critical. As the recent Statement of Common Ground between the Central Lancashire Authorities and Lancashire County Council states:
- “LCC considers that in addition to meeting the total need in numerical terms there is a need to provide sites of the right kind in the right place including those which are suitable for supporting specialised sector growth and innovation in the medium to longer term”* (para 5.16).
- 1.38 Developing the “right kind, right place” thinking of LCC then it is clear that the NCF-related needs will require sites that are both:
- Proximate to the main NCF Campus at the Samlesbury EZ.
 - Flexible enough to meet a wide range of different occupier needs, spanning differently sized requirements and different sectors.
- 1.39 In conclusion, the need for at least an additional **20 hectares of strategic employment land** linked to NCF should be identified in the Local Plan and sites allocated. This need is over and above the past-trends based needs. The location of the sites allocated to meet this strategic need is crucial, and they **must be proximate to the main NCF campus**.

² For example, at the Met Office in Exeter and at GCHQ at Cheltenham.