

Hearing Statement on behalf of Story Homes

*Examination of the Central Lancashire Local Plan
2023 - 2041*

Matters 8 & 9: Employment Land Need and
Allocations

October 2025

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Client

Story Homes Ltd

Our reference

STOM3025

October 2025

Introduction

This Hearing Statement is submitted on behalf of Story Homes (Story) with specific reference to their land interests at Cuerdale Garden Village (CGV), South Ribble. It addresses Matters 8 and 9¹.

CGV is a strategic land promotion covering 284ha of land, entirely within the local authority area of South Ribble. Story's proposition is a new settlement with capacity for 2,300 residential dwellings, 429,000 sqm of employment floor space plus supporting amenities, civic infrastructure and extensive open space. CGV is fully deliverable and would address a unique opportunity to reap the wide-ranging benefits of a substantial economic investment that comes in the form of the NCF in addition to accommodating a need for additional large-scale employment land allocations during the Plan period. There is a live planning application for a 'Phase 1' of CGV currently being determined by South Ribble Council (LPA ref. [07/2022/00451/OUT](#)).

Turley submitted extensive representations to the Regulation 19 consultation which included a critique of the planned provision of employment land and a report into the potential implications of the National Cyber Force Campus (NCF) at Samlesbury Enterprise Zone. Marron's have submitted hearing statements to other matters on behalf of Story, and Story are also members of a consortium of representors for which Stantec have submitted separate statements to Matters 1, 3 and 6. These should be read in conjunction noting that they draw on other technical submissions to the Regulation 19 consultation including a Central Lancashire Housing Need and Housing Land Supply Assessment undertaken by Stantec.

Story has sought to promote GCV at both the Regulation 18 and Regulation 19 states of the Central Lancashire Local Plan (CLLP). The Regulation 18 Local Plan notably featured CGV as a 'Growth Option' under Policy Direction 5 'Longer-Term Large-Scale Development Options'. In doing so the Regulation 18 CLLP recognised reasoning for strategic Green Belt release. Despite this, the Regulation 19 CLLP has omitted reference to CGV in its entirety and does not propose any Green Belt release across the three authorities' boundaries.

It is Story's view that CGV should be allocated as a strategic mixed-use allocation within the Regulation 19 CLLP. This represents the most sustainable means of meeting the additional development needs during the plan period and beyond

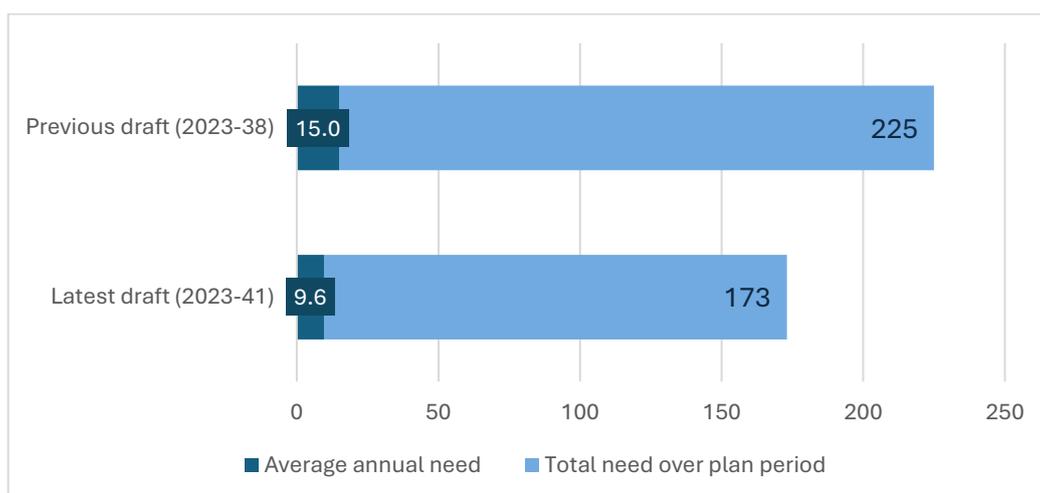
¹ It is understood that these are two separate matters with the allotted suggested word limit applicable separately to each. As such, this statement has a combined 6000-word limit. Individual word counts have been provided after each matter.

1. 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?

1.1 No. Story's submissions to the Regulation 19 CLLP² demonstrated that the Employment Land Need figure of 173 hectares is not justified and is an underestimation of the quantum of employment land required within this plan period. It is observed that it represents a considerably lower level of need than was previously evidenced in the 2022 assessment (225.06 ha), as shown in Figure 1.1.³

Figure 1.1: Evolution of Reported Need for Employment Land (total and annual)



Source: Central Lancashire authorities; Turley analysis

1.2 The overt decision to not consider or acknowledge the additional employment opportunities that the national significant investment in the NCF could have on the local economy of Central Lancashire is a primary factor contributing to the underestimation of need.

1.3 The 173 ha does not include any additional needs arising from the NCF, with the ELS, from which the figure is taken, confirming that the methodologies for calculating need 'make no allowance for any major public sector programmes which might generate jobs above the baseline'⁴, with specific reference made to the NCF as one such 'strategic project'. The

² Representation reference A60 – these include: 12b Critique of Planned Provision of Emp Land in Draft CLLP and 12c Potential Economic Implications of the NCF for CL

³ Central Lancashire Employment Land Update (February 2022), Executive Summary, paragraph xxii

⁴ Central Lancashire Employment Land Study – Update (2024), paragraph 3.8

Regulation 19 Local Plan is similarly clear that in establishing the need figure no account is given to the NCF where the only reference made in the Local Plan to the NCF is a suggestion of future working with Lancashire County Council *‘to understand the opportunity this establishment will create, the timescale and how it might affect the wider economy.’*⁵ The outcomes of any such joint working are not reflected in this Plan.

- 1.4 The establishment of the NCF was confirmed by the previous Government in November 2020. Whilst this proceeded the consultation on the Issues and Options version of the plan (November 2019 – Feb 2020) the confirmation of investment was over two years prior to the Regulation 18 Preferred Options Local Plan consultation which ran between December 2022 and February 2023.
- 1.5 In contrast to the Regulation 19 CLLP, the Regulation 18 CLLP included reference to the opportunity the NCF presented to Central Lancashire, acknowledging the Government having *‘recently confirmed the Delivery of a Cyber Hub North’*⁶. The Regulation 18 CLLP also identified, noting its location on Samlesbury, an expectation that the NCF was *‘likely to provide around 5000 jobs during the plan period and will take up the remaining land in this location once completed.’*⁷ The opportunity presented by the NCF was explicitly identified within the Spatial Approach (Policy Direction 2), confirming the Plan will: *‘Consider identifying a strategic area of growth linked to the Enterprise Zone and National Cyber Force at Samlesbury.’* It also included a commitment to: *‘Further consider the role of Safeguarded Land and the Samlesbury/Cuerdale Growth Option’*⁸. Indeed, direct consideration was given within the spatial strategy to the potential of CGV as being able to provide *‘sector leading economic growth opportunities and creating new associated communities.’*⁹
- 1.6 Any such consideration is lacking from the Regulation 19 CLLP. This omission is unjustified. It is evident that in the intervening period the commitment to investment has progressed and LCC has developed evidence and strategies acknowledging the forecast economic benefits and the impact on the supply of strategic employment land. The SoCG with LCC identifies that *‘a comprehensive review of long term strategic employment need across the three boroughs, including specialist sectors will be important as LCC believes that the Enterprise Zone in Samlesbury is likely to reach capacity early in the plan period.’*¹⁰
- 1.7 This is supported by information shared by LCC which identified that there were active and advanced enquiries as of July 2025 which would result in all seven of the remaining plots on the Enterprise Zone being taken up, with timescales for development estimated at 18 months to 2 years¹¹. It also accords with LCC’s representation to the Regulation 19 CLLP where LCC confirmed: *‘There is a need for strategic sites to be allocated in the Local plan to meet growth needs and to support specialised needs.’*¹²

⁵ Central Lancashire Local Plan Publication Version (2025), paragraph 5.11

⁶ Central Lancashire Local Plan, Preferred Options – Part One Consultation (2022), page 36

⁷ Central Lancashire Local Plan, Preferred Options – Part One Consultation (2022), paragraph 3.5

⁸ Central Lancashire Local Plan, Preferred Options – Part One Consultation (2022), paragraph 3.8

⁹ Central Lancashire Local Plan, Preferred Options – Part One Consultation (2022), page 36

¹⁰ DC11: Statement of Common Ground between the CLAs and Lancashire County Council, paragraph 5.31

¹¹ LCC note in the information shared that all of the enquiries would be LDO compliant and could therefore secure planning permission within 28 days.

¹² D12: LCC Response letter to Regulation 19 CLLP

- 1.8 The immediacy of the planned investment is mirrored by parallel public sector investment aimed at facilitating agglomeration benefits, with the recent agreement to fund a £13.2m innovation hub within Samlesbury EZ, providing 27,000 sq.ft of floorspace to provide ‘*multi-functional business premises*’.¹³ This reflects wider programmes aimed at accommodating related ‘start-up’ investment¹⁴.
- 1.9 The draft Lancashire Growth Plan (LGP), published in February 2025 ahead of the consultation on the Publication Version, provided a clear articulation of the programme and estimated economic impacts of the investment. This was restated, drawing from the same cited evidence prepared by Plexal on behalf of LCC, in the recently published final LGP¹⁵:

‘National Cyber Force HQ: Set to be permanently based in Samlesbury from 2025, this joint initiative between the Ministry of Defence and GCHQ will support around 2,000 personnel and generate an estimated 3,120 direct and indirect jobs. The Lancashire Cyber Partnership is embedding the NCF within the local economy to drive innovation and job creation.’ (emphasis underlined)¹⁶

- 1.10 The failure to plan for the NCF is a significant omission that directly conflicts with the Council’s stated purpose of the Plan is ‘*to help co-ordinate development in the area and contribute to boosting investment and employment*’ (emphasis added). As the LGP confirms it is one of ‘*several major defence and cyber innovation programmes that align with national strategic priorities*’.
- 1.11 It is unsound with reference to the applicable NPPF 2023 (specifically Paragraphs 85, 86 and 87), which lends significant weight to supporting economic growth and productivity (paragraph 86) having regard to national economic strategy and local policies for economic development and regeneration. It specifically requires that policies ‘*set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*’ (paragraph 86(b)). It also expects policies to ‘*recognise and address the specific locational requirements of different sectors*’ (paragraph 87).
- 1.12 These matters are particularly pertinent within the context of an enhanced push for growth from the current Government. The Modern Industrial Strategy (MIS) sets out the UK government’s ten-year plan to deliver long term sustainable growth and investment in 8 identified high growth sectors (the IS-8). These include the ‘Defence’ sector, with a commitment to unlock the ‘*sector’s significant untapped potential for creating growth spillover benefits through innovation, exports and scale-ups*’.¹⁷ Digital and Technology is another of the 8 sectors, with Cyber Security identified as one of the prioritised frontier technologies with the greatest growth potential¹⁸. The Digital and Technologies Plan establishes a commitment to ‘*establish key supply routes into our leading intelligence and defence capabilities, including the National Cyber Security Centre and the National Cyber Force*’.¹⁹ (emphasis added)

¹³ <https://www.lancashiretelegraph.co.uk/news/24878197.new-13m-innovation-hub-agreed-open-samlesbury/>

¹⁴ [Cyber start-ups to launch Lancs high-tech corridor | Lancashire Telegraph](#)

¹⁵ The reference to the articulation of the economic impact of the NCF was referenced extensively in Story Homes’ Regulation 19 submissions.

¹⁶ Lancashire Growth Plan (2025), LCCA, page 29

¹⁷ UK Modern Industrial Strategy (2025), page 14

¹⁸ *Ibid*, page 133

¹⁹ The UK’s Modern Industrial Strategy: Digital and Technologies Sector Plan (2025) Page 8

- 1.13 In supporting Story's Regulation 19 submissions, JLL identified the potential scale of spin-off commercial floorspace needs²⁰. This identified the potential for a growing cyber security sector, stimulated by the NCF investment, to generate significant additional commercial floorspace demand arising from businesses and occupiers seeking to benefit from agglomeration economies. This included a conservative estimated additional need for 270,000 sqm of office floorspace in the region, with circa 43,000 sqm of this in Lancashire alone. With the omission of the additional jobs estimated to be generated by the NCF any such needs within Central Lancashire are not accounted for within the Plan.
- 1.14 The generation of supply-chain requirements, arising from NCF and BAE on the EZ, can also be expected to increase beyond this specific requirement in the context of the Government's wider commitment to an increase in defence spending and procurement approaches which will see an increase in onshoring of spending²¹. The failure to acknowledge this key sector of the modern economy is a fundamental failing of the Plan.
- 1.15 Further to the failure to adequately account for the strategic employment needs arising from the NCF investment, several other methodological limitations were identified in Story's Regulation 19 CLLP submissions, which served to further contribute to the identified need of 173 ha being concluded as an under-estimation. These are summarised below, looking in turn at the calculated need for office and industrial & warehouse need recognising a different methodology is deployed for each.
- 1.16 Firstly, with reference to the calculation of the need for office floorspace the following methodological limitations are considered to serve to under-estimate the full need:
- An unjustified reliance on a single baseline economic forecast. In accordance with concerns raised under Matter 3 by Stantec on behalf of a consortium of developers including Story, the reliance of a single economic forecast is considered unjustified. This recognises that it is good practice to compare and contrast the outputs of different forecasting houses. This is illustrated by Stantec's comparison with a forecast sourced from Oxford Economics in April 2025 which forecast a much stronger level of growth (some 10,000 additional baseline jobs²²).
 - An apparent error in the conversion of the underlying economic forecast from total employment into full-time equivalent (FTE) jobs (required to generate associated floorspace requirements) in the labour-demand model (used to generate the office requirement). This appears to result in part-time roles having been excluded in entirety. It is estimated that this results in an under-counting of some 2,775 FTE jobs²³.
 - An excessive allowance for people working only from home. This ultimately, and inexplicably, assumes that rates recorded at the depths of the pandemic will be sustained. This fails to align with a growing body of evidence which suggests that this is not the case. This serves to remove a further 1,709 FTE jobs from the calculations,

²⁰ Representation reference A60 – 12c Potential Economic Implications of the NCF for CL, Appendix 1

²¹ The UK's Modern Industrial Strategy: Defence Industrial Strategy (September 2025)

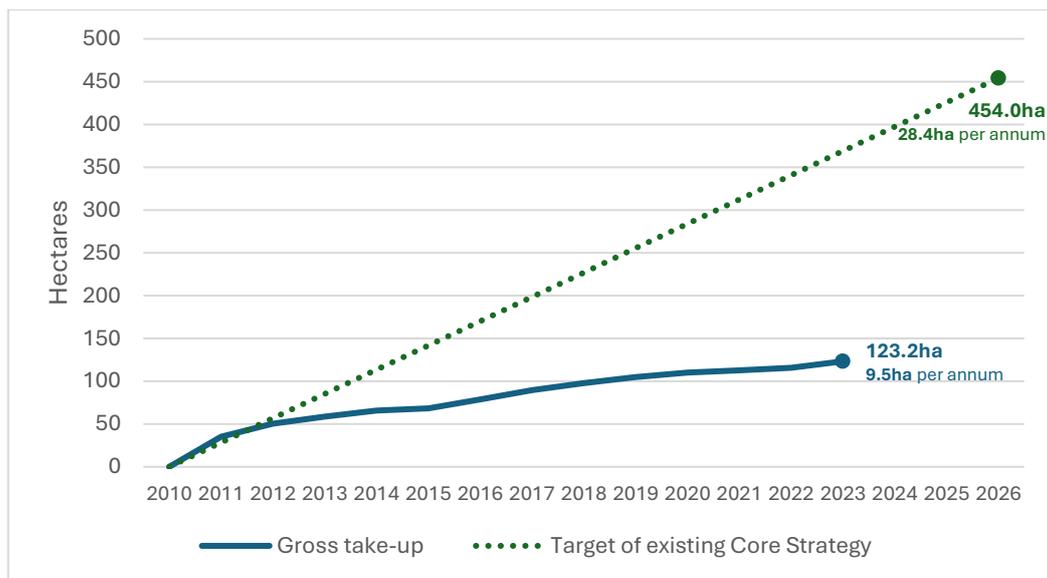
²² This is referenced in Story's Regulation 19 CLLP representations and restated in the Stantec Matter 3 statement on behalf of the developer consortium including Story Homes

²³ Story's representation (reference A60) – 12b Critique of Planned Provision of Emp Land in Draft CLLP, Table 4.1

reducing the overall number of additional jobs across all sectors by some 15%²⁴. A more reasonable deduction should have been applied.

- 1.17 The calculated need for industrial and warehouse uses a different methodology whereby future need is solely based on an extrapolated trend-based take-up figure since 2010. This period is characterised by an under-delivery of floorspace, where monitoring data indicates take-up of all employment land of only 123 ha (gross) between 2010 and 2023, compared to a target in the Core Strategy to deliver 454 ha by 2026. This equates to only 27% of the targeted employment land being taken up with only three years remaining in the plan period.

Figure 1.2: Past Take-up vs. Target of Adopted Core Strategy (2010-26)



Source: Central Lancashire Authorities; Turley analysis

- 1.18 B8RE, in their evidenced assessment of supply, included within Story’s Regulation 19 submission, suggest this under-provision has arisen from ‘a chronic shortage of new build and oven ready development sites’,²⁵. As a result, the need for only 173 ha ‘bakes-in’ the failures of the current plan to identify deliverable sites which can meet market demand and represents a constrained figure. This is in direct conflict with the Government’s express intentions for the planning system to support economic growth to improve lives and address regional inequalities.
- 1.19 Finally, in accordance with Story’s hearing statement to Matter 1 the proposed plan period is considered insufficient and unjustified. The extension of the plan period to 2042 would, irrespective of the concerns in the methodology identified above, generate a larger need which will need to be provided for.
- 1.20 The above serves to confirm that the 173 ha of need is an under-estimate, and the Plan should recognise and respond to there being a reasonable prospect of higher needs. This specifically

²⁴ BE Group (February 2025) Central Lancashire Employment Land Study – Land Supply and OAN Update 2024, Tables 16-18

²⁵ Story’s representation (reference A60) – 12b Critique of Planned Provision of Emp Land in Draft CLLP – Appendix 1 ‘B8 Real Estate Market Insights Report’

includes the need for land to respond positively to the significant impacts and opportunities associated with the NCF.

8.2: Are 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?

- 1.21 The evidence presented in the ELS (2024) makes it very challenging to directly address this question. This lack of clarity arises with the ELS (2024) not including an updated supply picture from the 2022 iteration (see paragraph 5.22 of the ELS 2024) and subsequently introducing the assessment of several ‘new sites’ without a clear conclusion as to whether they are deemed ‘suitable’.
- 1.22 Acknowledging the above limitation, focus has been directed at the proposed allocations. Story’s Regulation 19 submission drew on evidence provided by B8RE to identify three principal concerns with this supply:
- Several of the sites are anticipated to be well advanced in their delivery with a reasonable expectation that they will be taken up early in the Plan Period, acknowledging strong market demand. This includes, for example EC3.2 (Preston East Junction 31A M6, where submission of an application is understood to be imminent and EC2.1 which is understood to be on site. There is a resulting risk that the supply will be rapidly depleted.
 - The above include several of the larger sites which are identified as benefiting from proximity to the strategic road network. B8RE identify that a significant proportion of the other sites in contrast do not benefit from this accessibility thereby making them unsuitable for meeting the needs of modern logistics occupiers²⁶.
 - Insufficient consideration is given to the suitability of several sites for industrial and warehouse occupiers arising from their proximity to existing residential uses.
- 1.23 Further to the above it is observed that Strategic Allocation SS5 constitutes a significant proportion of the overall supply (63.3 ha of the total of 218.4 ha). There is understood to be a significant risk that the likely contribution of this site is over-stated, with representations to the Regulation 19 CLLP submitted by the landowner stating that they saw the site as being a residential-led, mixed-use development with a reduced quantum of land provided for employment development. It was observed that this was supported by the ELS (2024) which considered the sites suitability from a market perspective and highlighted that given the scale and location of the sites it was assumed that any scheme would be housing led, recognising that developers and logistics businesses would prefer a location closer to the M55 junction and more distant from housing development²⁷.

²⁶ It is noted that of the 22 sites ‘scored’ in Appendix 4 of the ELS that 15 have a score of less than 8 which it is understood means that they are more than 1km from a primary route (motorway, strategic highways network route).

²⁷ Representor A61 Harworth Estates Investments Ltd, Central Lancashire Local Plan Publication Version Soundness Representations (April 2025), Lichfields: Paragraphs 4.6 – 4.13

- 1.24 Accounting for these concerns with the suitable supply and the higher need for concluded in Q8.1, specifically with reference to the additional need required to realise the benefit of the NCF investment, Story consider that additional land which can accommodate these specific and strategic needs should be identified within this Plan. This should be identified through a review of the Green Belt.
- 1.25 As the Regulation 18 CLLP identified, any such assessment must recognise the locational advantages of the proximity of the provision of additional employment land to facilitate agglomeration effects associated with the NCF and Samlesbury along with the provision of associated homes to accommodate the accompanying uplift in housing need.
- 1.26 Story Homes do not consider that it would be appropriate to address the failure to plan for the strategic need for employment land through an early review of the Local Plan. There is an evident need to ensure that investment opportunities can be accommodated now. This requires a sufficiently flexible supply of sites to be allocated where there is a lead-in time from the allocation of a site until space is occupier ready. Where it is noted that approximately ten years have passed since the adoption of the current Local Plan there is an evident significant risk that awaiting a further review would serve to curtail local economic growth. This is in direct contradiction to the Government's stated expectations within national strategy.

Word count: 2993

2. 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?**
- **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?**

- 2.1 The absence of a clear explanation and justification as to the site selection process presents a challenge in determining the extent to which the selected sites adequately address needs at an authority level or for specific sectors of the economy. This is a significant failing of the Plan, and the Councils will need to provide a clear justification to enable a judgment to be made on the soundness of the Plan in accordance with paragraphs 85, 86 and 87 of the NPPF.
- 2.2 Story's submission at the Regulation 19 stage, as explained in our **answer to Issue 8**, explicitly raised a concern that inadequate account has been taken of regional and national growth strategies in the determination of employment need and as a result the identification of employment land to accommodate additional needs. Story considers that the omission of planned provision to respond to the national investment in the NCF on the Samlesbury EZ is a direct failure against the requirement set by NPPF paragraph 86(a).
- 2.3 The Modern Industrial Strategy (MIS) identifies the 'defence' and 'digital and technology' (including cyber security' as national priority growth sectors.
- 2.4 The investment in the NCF headquarters within Central Lancashire directly aligns with the Government's stated ambition where the rationale for investment confirmed that: *'NCF will establish its centre of gravity in the northwest of England. It will contribute to driving growth in the technology, digital and defence sectors.'*²⁸
- 2.5 The Lancashire Growth Plan (LGP), in alignment with the MIS identifies Lancashire defence sectoral strengths and specialism. It specifically references the NCF HQ as a major defence and cyber innovation programme, which as we reference in our Q8.1 response will from 2025

²⁸ https://assets.publishing.service.gov.uk/media/61b9f526d3bf7f05522e302e/Force_Explainer_20211213_FINAL_1_.pdf

generate an estimated 3,120 direct and indirect jobs and provide the opportunity to drive innovation and job creation in the local job.

- 2.6 Story's submissions evidenced how comparable economic investments within cyber-security have positively impacted on localised economies and generated economic growth and demand for supporting employment and residential floorspace. One of the key examples cited is 'GCHQ Cheltenham and the Golden Valley'.
- 2.7 GCHQ which opened in 2003 has attracted a substantial cluster of related industries and in 2020, Cheltenham Borough Council and its partners adopted a Supplementary Planning Document (SPD) for the Cyber Central Garden Community – also known as the "Golden Valley". Provision was made for 1,100 new homes and 45ha of employment land, reflecting the underpinning evidence produced by the Councils which recognised the land requirements of GCHQ.
- 2.8 It is clear from the experience in Cheltenham, and other locations, that the provision of a facility such as the NCF has the potential to attract a significant quantum of complementary employment activity and business growth. These businesses will require accommodation and facilities reasonably close to the new development. The Plan has failed to take this into account and not sought to make any provision for the locational requirements of this sector.
- 2.9 As referenced in our Matter 8 response in supporting Story's Regulation 19 submissions JLL's market report identified the potential for a growing cyber security sector, stimulated by the NCF investment, to generate significant additional commercial floorspace demand arising from businesses and occupiers seeking to benefit from agglomeration economies. This included a conservative estimated additional need for 270,000 sqm of office floorspace in the region, with circa 43,000 sqm of this in Lancashire alone. With the omission of the additional jobs estimated to be generated by the NCF any such needs within Central Lancashire are not accounted for within the Plan.
- 2.10 The generation of supply-chain requirements, arising from NCF and BAE on the EZ, can also be expected to increase beyond this specific requirement in the context of the Government's wider commitment to an increase in defence spending and procurement approaches which will see an increase in onshoring of spending²⁹. The failure to acknowledge this key sector of the modern economy is a fundamental failing of the Plan.
- 2.11 The Regulation 19 CLLP similarly fails to acknowledge LCC's wider identified need for a new generation of strategic sites. As referenced in our Matter 8 statement LCC have been clear within their Regulation 19 submission to state: *'There is a need for strategic sites to be allocated in the Local plan to meet growth needs and to support specialised needs.'*³⁰ This need has been restated in the SoCG between LCC and the Councils.
- 2.12 In contrast to this need the largest proposed allocation in the Regulation 19 CLLP is Preston West, the proposed employment element of 63.3 ha as identified above is believed to be over-stated and not suited for logistic uses, followed by Cuerden (50 ha). These remain notably smaller than several of the sites allocated through the existing Core Strategy in 2012, where Samlesbury EZ, for example offered circa 72 ha of land, with a further 65 ha available at

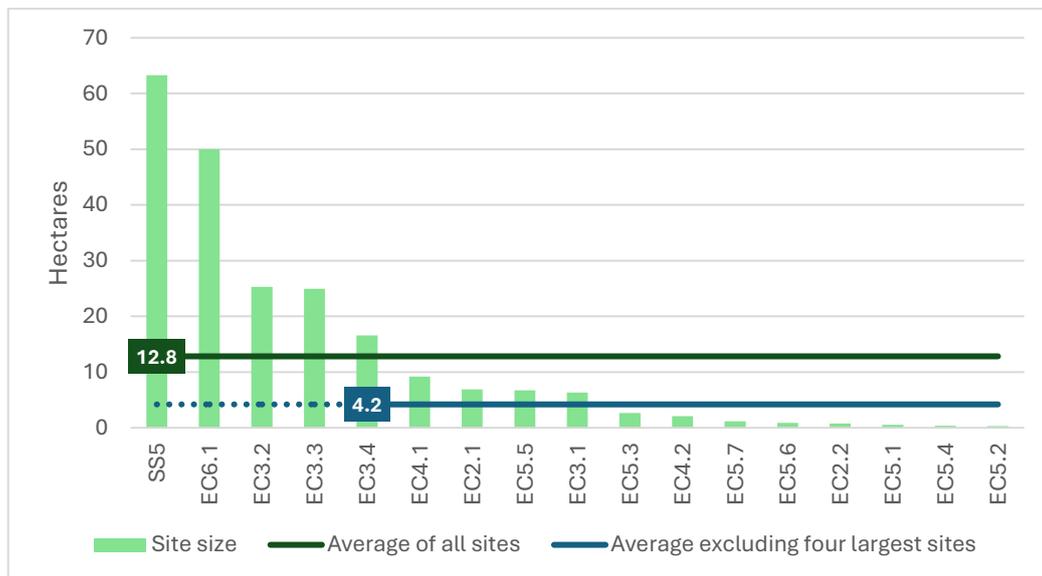
²⁹ The UK's Modern Industrial Strategy: Defence Industrial Strategy (September 2025)

³⁰ D12: LCC Response letter to Regulation 19 CLLP

Cuerden. Indeed, looking across the proposed allocations, they average only circa 12.8 ha, with this skewed by the four largest sites which once removed result in an average site size of only 4.2 ha.

2.13 This is illustrated in Figure 2.1.

Figure 2.1: Size of Proposed Allocations



Source: Central Lancashire authorities; Turley analysis

- 2.14 Inadequate consideration has been given to the extent to which this portfolio of sites responds to the strategic needs affirmed by LCC as well as an acknowledging growing trend for larger requirements amongst large parts of the economy.
- 2.15 The failure to take account of the substantial economic investment delivered by NCF or an identified need for strategic-scale sites in the identification of appropriate employment sites means that the three authorities will fail to capitalise and secure the associated wide-ranging benefits, GVA and job creation. Ultimately this could lead to investment being directed to other locations within the north west. As the response to Matter 2 made on behalf of the consortium of developers identifies, the threat to investment will be compounded by a lack of supporting infrastructure, including the provision of a sufficient amount of housing.
- 2.16 A more positive approach should have been taken which recognised the need for further strategic scale sites in proximity to the EZ to capitalise on agglomeration benefits and accessibility to the strategic road network.
- 2.17 Story considers that to address this deficiency and ensure an adequate supply of sites and land to respond to the opportunity arising from the NCF additional land should be identified. This will require a review of the Green Belt.
- 2.18 As the Preferred Options version of the Plan identified, any such assessment must recognise the locational advantages of the proximity of the provision of additional employment land to facilitate agglomeration effects associated with the NCF and Samlesbury along with the provision of associated homes to accommodate the accompanying uplift in housing need.

2.19 Story Homes do not consider that it would be appropriate to address the failure to plan for the strategic need for employment land through an early review of the Local Plan. There is an evident need to ensure that there is a plan now to accommodate investment opportunities, recognising as has been the case on many of the strategic sites in the previous generation of the Local Plan, that there is a lead-in time from the allocation of a site until space is occupier ready. Where it is noted that it has taken the authorities over ten years since the adoption of the current Local Plan to this plan progressing to examination there is an evident significant risk that planning acts to curtail local economic growth. This is in direct contradiction to the Government's stated expectations within national strategy.

9.2: 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?**

2.20 Story Homes have not reviewed in detail the evidence assembled to justify the allocation of each of the sites listed above. However, in submissions at the Regulation 19 stage, B8RE provided a '*Real Estate Market Insights Report*'.³¹ This raised several site-specific issues which challenged the approach taken by the Council in identifying a suitable supply of employment land, as set out in our response to Question 8.2. This included concerns with regards specific issues which also impacted on B8RE's view as to the likely deliverability of sites. B8RE have provided an updated view on the sites listed above, with the following noted:

³¹ Story's representation (reference A60) – 12b Critique of Planned Provision of Emp Land in Draft CLLP – Appendix 1 'B8 Real Estate Market Insights Report'

- **EC2.2 Former Gas Works, Bengal Street, Chorley**- Planning permission³² has been granted for residential (10 townhouses and a five-storey apartment block). **This site should as a result be removed from the employment supply.**
- **EC3.3 Roman Road Farm** – B8RE identified the anticipated need for funding to facilitate infrastructure to realise development across the full extent of the site. It is unclear as to the position regards the securing of this funding and its implications for delivery timescales.

2.21 Where the above focuses on two sites, when considered alongside the anticipated reduction to the employment component of site SS5 identified in our Q8.2 response, it illustrates the importance of robustly assessing the deliverability of sites and suggests that the totality of employment land to respond to need in the plan period is overstated.

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?

- 2.22 In accordance with the answers above and our response on Issue 8, Story consider that the identified supply does not make appropriate provision for the future employment needs within the three Authorities for the Plan Period.
- 2.23 This failure is mirrored in the flawed consideration of the spatial distribution of supply. There is insufficient evidence to demonstrate that the supply of employment land has been identified based on where needs will arise.
- 2.24 For example, the extent to which supply has been identified to respond to recognised strategic growth corridors, including the A59 'Growth Corridor', which is identified in the Lancashire Growth Plan (2025) and includes Samlesbury Enterprise Zone and therefore the NCF, is unclear.
- 2.25 The omission of any consideration of the positive impacts of the NCF investment results in an inadequate supply of land to meet the needs of the digital and cyber sectors of the modern economy which has the potential to stimulate and capture associated investment and economic growth.
- 2.26 This is acknowledged within the SoCG with LCC, which identifies that *'a comprehensive review of long term strategic employment need across the three boroughs, including specialist sectors will be important as LCC believes that the Enterprise Zone in Samlesbury is likely to reach capacity early in the plan period.'*³³

³² 25/00330/CB3MAJ

³³ DC11: Statement of Common Ground between the CLAs and Lancashire County Council, paragraph 5.31

- 2.27 This accords with LCC's representation to the Regulation 19 CLLP where LCC confirmed: *'There is a need for strategic sites to be allocated in the Local plan to meet growth needs and to support specialised needs.'*³⁴
- 2.28 In line with our response above precedent examples, including the 'Golden Valley' in Cheltenham affirm the recognised value of providing opportunities to co-locate supply-chain industries and businesses in proximity to the NCF and the existing and developing cyber and defence eco-system on Samlesbury EZ. The Regulation 19 CLLP has not acknowledged this opportunity or the associated needs in the proposed allocations of employment land.
- 2.29 The omission of the additional needs arising from the ongoing investment in the NCF HQ and the opportunity this presents to attract further investment and employment by the identification of appropriate land in proximity in this nationally prioritised sector of the economy results in an unsound plan when assessed against the requirements of paragraphs 85, 86 and 87 of the NPPF.
- 2.30 The development of strategic-scale sites to support a modern economy and the Lancashire Growth Plan is of vital importance to fully realise the economic opportunities of Central Lancashire.
- 2.31 CGV offers a unique opportunity to enable the needs of this sector to be met and benefit from agglomeration effects within the A59 Growth Corridor. This includes complementary commercial floorspace as well the provision of housing to attract and retain workers in proximity, meeting associated additional housing needs.

Word count: 2326

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The logo for Turley, featuring the word "Turley" in a bold, dark blue, sans-serif font.

³⁴ D12: LCC Response letter to Regulation 19 CLLP