

Central Lancashire Local Plan - Matters Papers Hearing Statement

Matter 8 Issue 8 - Employment Land Need

Harworth Estates Investments Ltd

Representor ID: A61

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1.0 Introduction

1.1 Lichfields is appointed by Harworth Estates Investments Ltd [Harworth] (Representor ID: A61) to prepare Matters Papers relating to the emerging Central Lancashire Local Plan [CLLP].

1.2 This Written Statement has been prepared in response to the Matters, Issues and Questions [MIQ] raised by the Inspectors for the Examination in Public [EiP] hearing sessions. The Written Statement addresses the following Matter:

- Matter 8 Issue 8 - Employment Land Need

1.3 Other Matters Papers have also been prepared by Lichfields on behalf of Harworth to address the following:

- Matter 1b - Overarching Matters
- Matter 2 - Vision & Objectives, Spatial Strategy & Location of New Development, and Site Selection Process
- Matter 4 - Strategic Sites & Mixed Use Allocations (Policy SS5 - Preston West)
- Matter 7 - Housing Policies
- Matter 14 - Sustainable Travel, Infrastructure and Delivery, and Monitoring

1.4 These Matters Papers have been drafted in the context of Harworth's land interest in the draft Preston West strategic allocation (draft Local Plan Policy SS5) ('the Site'). Harworth has an interest in a large proportion of land across the site, including the Tallentine land, and is committed to progressing a high-quality, sustainable, attractive and accessible development, complementing the existing residential and employment development in Preston.

1.5 Harworth is supportive of the draft Preston West allocation (Policy SS5) and considers that the site represents an excellent opportunity to deliver a sustainable, high-quality and attractive residential-led development. Harworth has been working closely in collaboration with the Council to ensure that a robust allocation based on sound and proportionate evidence can be facilitated, to set the basis for the comprehensive delivery of the site.

1.6 These Matter Papers representations should be read in conjunction with previous submissions on the CLLP (Representor ID A61) as well as those made on other Matters listed above. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF') (December 2023) and the National Planning Practice Guidance ('PPG').

2.0 **Matter 8 - Employment Land Need and Allocations**

Issue 8 – 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 Harworth's development interest is primarily on the draft allocated site at Preston West. Although the policy governing the delivery of Preston West (Policy SS5) sets out that the site could deliver up to 63.3ha of employment land, this is not accounted for within the employment allocations identified in Policy EC3. It is intended that the Preston West allocation will be a residential-led development with an element of employment being delivered in accordance with a comprehensive masterplan. As such, the Preston West allocation is seen as being supplementary to the Council's employment supply figure and given the strategic nature of the site, a significant proportion of the site will be delivered outside the current plan period.
- 2.2 Notwithstanding, Harworth is concerned that the employment land need figure of 173 hectares for the Plan period is not appropriately justified, as there is a misalignment between the expected job growth based on the employment land supply and the level of housing growth being pursued.
- 2.3 Policy HS1 (Scale of Housing Growth and Distribution of Housing Requirements) states that the CLLP will provide for 23,652 net additional dwellings 2023-2041, which equates to 1,314 dpa. However, 1,314 dpa results in a misalignment between jobs and workers due to the following factors:
- The figure is underpinned by the Central Lancashire Housing Study Update (HO09) which models a range of employment scenarios including an 'Employment-led' projection. This was based on using economic activity rates data from the 2021 Census alongside jobs growth forecasting data from Cambridge Economics [CE] and a 1:1 commuting ratio. This totals 894 jobs per annum (16,098 total) over the period 2023-2041, and 1,237 dpa.
 - The Central Lancashire Employment Land Study and OAN Update 2024 (ERO6a) concludes that Central Lancashire's employment land OAN is 172.87 ha, split 18.24 ha for office (based on a Labour Demand scenario) with the remaining 154.63 ha for industrial / warehousing uses (based on past take up modelling). This 173 ha figure is taken forward in Policy EC1 (Scale of Economic Growth) with a number of allocations identified to support employment needs.
 - The housing and employment policies in the CLLP are therefore misaligned. The 1,314 dpa requirement is underpinned by the figure of 1,237 dpa, generated by the CE employment forecasts, then uplifted slightly to meet 80% of the new SM3 housing target. Policy EC1 (Scale of Economic Growth) identifies a requirement of 173 ha of

employment land. Importantly, this figure is only aligned with forecasts for office needs. For B2/B8 requirements, past take up rates were used.

- Therefore, the 173 ha employment land target does not align with the labour supply projection. If all 173 ha comes forward for development by 2041 it will accommodate far higher levels of employment than could be sustained by 1,314 dpa.

2.4 The evidence underpinning the plan demonstrates that the Council has identified an ample supply of employment land to meet the needs over the plan period. As such, there is no requirement on Preston West to meet a large proportion of the Councils' future employment land needs. Although Harworth is committed to bringing forward a comprehensive masterplanned development at Preston West, it will be predominantly residential led and is highly unlikely to deliver up to 63.3ha of employment land.

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