

## Central Lancashire Local Plan

Examination Hearing Statement for Blackburn with Darwen Borough Council  
Representor ID: D03  
Matter 8: Employment Land Need and Allocations

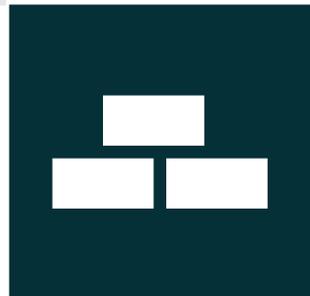
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## Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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# 1 INTRODUCTION

## 1.1 Context

1.1.1 Rapleys LLP has prepared this Examination Hearing Statement on behalf of Blackburn with Darwen Borough Council ('the Council') in its twin roles as a neighbouring local planning authority and as the owner of a significant parcel of Green Belt land within the borough of South Ribble ('the land' or 'the subject land'). As context for our responses to the MiQs, the following brief summaries of the subject land and our Regulation 19 response are relevant and intended to aid understanding of this Statement.

## 1.2 The Subject Land

1.2.1 The land is located within the A59 corridor running east from J31 of the M6 motorway and adjacent to the village of Mellor Brook. The land also adjoins Samlesbury Enterprise Zone and Innovation Hub and the BAE Systems Samlesbury operations site, which collectively form a strategic and highly successful economic cluster specialising in the fields of advanced engineering and manufacture, science and technology and cyber. The cluster generates significant numbers of highly skilled, high value jobs, and the Enterprise Zone is also soon to be the home of the National Cyber Force, a Government backed partnership between the MoD and GCHQ, with its £5bn HQ now under construction and expected to generate an estimated 3,120 direct and indirect jobs and a GVA contribution of £112.6 million (Lancashire Growth Plan, 2025-2035, published in September 2025). This expansion is very significant and is likely to mean that Lancashire can leverage additional Government investment as a result. Furthermore, recent local press reports indicate that Lancashire County Council has recently agreed major funding for a new innovation hub within the Enterprise Zone, and the Samlesbury Enterprise Zone and Innovation Hub is identified within the Lancashire Growth Plan as one of 10 'Anchor Sites' (also referred to as 'transformational projects'), which will accelerate growth and deliver nationally significant outcomes.

1.2.2 Please refer to our Matter 2 statement for further details regarding the Growth Plan.

## 1.3 Our Regulation 19 Response

1.3.1 Our Regulation 19 response concluded that the draft Plan lacks ambition, in that it fails to adequately recognise the strategic importance, economic strengths, success in attracting investment and potential for further growth of the cyber corridor between Lancaster, Salmesbury and Manchester. The Plan does not provide for its housing and employment needs, it is unsound and should not proceed. Instead, given the scale of those needs and the absence of sufficient available urban or previously developed land, exceptional circumstances exist whereby it is necessary to release Green Belt land in locations to be determined following a Green Belt review which prioritises grey belt sites conforming with sustainable patterns of development, in accordance with paragraphs 145 to 149 of the NPPF. Such a Green Belt review, in circumstances like this, where development needs are not being met in full, would also be aligned with the recent advice to the Planning Inspectorate from the Minister for Housing and Planning, dated 9<sup>th</sup> October 2025 (a copy of this letter is provided within Appendix 1 to our Matter 2 statement).

1.3.2 Our response also provided evidence that the subject land constitutes grey belt and that, to help meet employment and housing needs generally and complement the economic strengths and growth potential of the Samlesbury economic cluster specifically, it would be a sustainable location for strategic, mixed-use development.

## 2 RESPONSE TO THE INSPECTORS' QUESTIONS ON MATTER 8: EMPLOYMENT LAND NEED AND ALLOCATIONS.

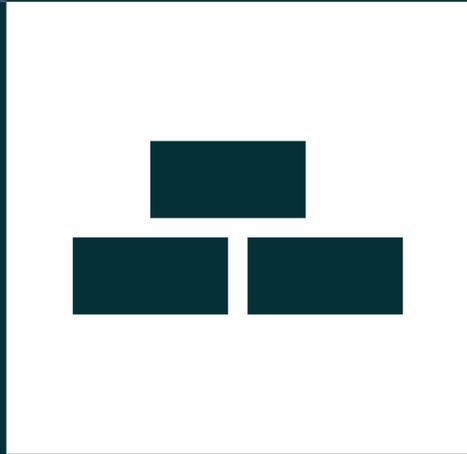
### Policies EC1 – EC4

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

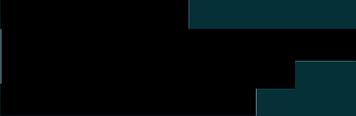
- 2.1 **Question 8.1: Is the Employment Land Need figure of 173 hectares for the Plan period justified and are the assumptions and methodology from which it was arrived at soundly based? Does the assessment take adequate account of strategic employment needs, regional and national growth strategies and the specific locational requirements of different sectors?**
- 2.1.1 The content of the draft Local Plan in relation to the provision of employment land is not justified or consistent with national policy, for the various reasons we describe below.
- 2.1.2 Arising from BE Group's Employment Land Study: Land Supply and OAN Update 2024 (examination doc EC6a), the draft Plan identifies a need for 173 hectares of employment land during the Plan period, based on a total jobs growth forecast of 16,660 jobs across the Plan area, as provided by Cambridge Econometrics. However, as we also described in our response to Matter 2, an alternative jobs growth figure produced by Oxford Economics is much more optimistic, forecasting 26,550 additional jobs. Furthermore, neither of these forecasts include jobs growth associated with specific projects in the Plan area, such as the proposed location of the National Cyber Force HQ within Samlesbury Enterprise Zone. The Lancashire Growth Plan (page 29) indicates that 3,120 direct and indirect jobs could be created as result of this initiative.
- 2.1.3 We also note from paragraph 3.8 (page 66) of the Employment Land Study Update (doc EC6a, which we will call the ELSU) that its employment need forecasts are 'Policy Off' in that they make no allowance for any major public sector programmes which might generate jobs above the baseline. In this context, although reference is made to '*strategic projects proposed in Central Lancashire, at this time, most notably the development of the National Cyber Security Centre at Samlesbury, there are no clear forecasts of the jobs growth resulting from these schemes which could inform a Policy On forecast. For this reason, a Policy On Scenario, relating to any active local programme is not undertaken here.*'
- 2.1.4 In our view, now that the National Cyber Force HQ is not only planned and funded but is actually under construction and will clearly generate large numbers of direct and indirect jobs, there are strong grounds to justify re-visiting the ELSU so that it can adopt a 'Policy On' approach to better reflect current circumstances.
- 2.1.5 As it stands, Policy EC1, in providing for only 173 hectares of employment land, pays insufficient heed to the national political and planning imperative to stimulate and enable sustainable economic growth. Paragraph 5.2 of the draft Plan recognises this over-arching imperative, where it states:
- 'The NPPF aims to build a strong, competitive economy, planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Supporting economic growth and better productivity are key national priorities, taking into account local business needs, strengths and wider opportunities and challenges. Sustainable economic growth should be encouraged with sites or criteria identified for local and inward investment to meet anticipated needs over the plan period. Locational requirements of different sectors should be recognised and support given to a prosperous rural economy.'*
- 2.1.6 However, draft Policies EC1-EC4 are focussed on short term, local needs. They are not ambitious enough to deliver against the national imperative, nor do they fully take into account local strengths or wider, longer-term opportunities or properly recognise the locational requirements of specialist sectors which are both successful and of sub-regional importance.
- 2.1.7 More specifically, we note that part 5 of Policy EC1 states that '*The Samlesbury Advanced Engineering and Manufacturing Enterprise Zone will continue to be a regionally significant site for employment*' and paragraphs 5.10 to 5.11 of the Plan state that:
- 'The Samlesbury Enterprise Zone has been a regionally significant employment site for many years. It hosts specialised businesses, including BAE systems..... In 2021, the Government announced that Samlesbury will be the home of the National Cyber Force, a partnership between the MoD and GCHQ. The Councils understand that the intention is to build on the cyber sector already existing in Manchester and bring high-skilled and well-paid jobs to the area. The Councils are working with Lancashire County Council to understand the opportunity this establishment will create, the timescale and how it might affect the wider economy.'*

- 2.1.8 Despite these acknowledgements in the draft Local Plan, and particularly now that the National Cyber Force HQ is actually under construction, the Plan's policies do not adequately recognise the strategic importance, economic strengths, success in attracting investment and potential for further growth of the cyber corridor between Lancaster and Manchester (including the M6-A59 corridor and the Growth Axis linking Sarncliffe, Blackburn town centre and the M65). In this context, the Plan also pays inadequate regard to the fundamentally important role within the cyber corridor played by the high value economic cluster comprising the Sarncliffe Enterprise Zone and Innovation Hub and the adjoining BAE Systems site.
- 2.1.9 In these regards, we also note that the SoCG signed with Lancashire County Council (Examination document DC11) states as follows (our emphasis):
- '...the Central Lancashire area hosts significant sector strengths which have the potential to grow and develop new, nationally significant high-value capabilities in digital, cyber, technology, knowledge-based industries and advanced engineering and manufacturing. In order to realise these opportunities, site allocation and assembly is critical in providing a strategic pipeline to respond to demand'; and*
- 'LCC believes that the Enterprise Zone in Sarncliffe is likely to reach capacity early in the plan period and the future local plan will be supporting specialised sector growth and innovation in the medium to longer term.'*
- 2.1.10 It therefore follows that the Plan's provision for employment land will be insufficient to align with the objectives of the Lancashire Growth Plan and will not meet the full employment needs of the Plan area.
- 2.1.11 These examples show that there is a need to plan positively for the future consolidation and sustainable expansion of the Sarncliffe economic cluster, in the form of complementary employment and associated residential growth. In turn, this should be recognised by identifying additional suitable land for employment, over and above the 173 hectares currently provided for in the Plan. It is critical that the future success of this economic cluster is not inhibited by a failure now to identify suitable land for it to grow.
- 2.1.12 This absence of any additional employment allocations outside but closely related to the Sarncliffe Enterprise Zone also means that the draft Plan is not justified and it fails to take appropriate account of central government and county-wide support for further growth at Sarncliffe and the cyber corridor as a whole. In these ways, the Plan also conflicts with paragraphs 85-87 of the NPPF, Core Policy 2 of the adopted Blackburn with Darwen Local Plan and the objectives of the Lancashire Growth Plan, all of which are set out in detail within our Regulation 19 submission, so are not repeated here.
- 2.2 **Question 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?**
- 2.2.1 We will await the response of the three Councils in respect of the last two parts of this question, because the position in these regards is unclear to us. In response to the first part, we make the following points in respect of the findings of the Employment Land Study Update (doc EC6a, 'the ELSU') and its references to the Sarncliffe Enterprise Zone (these apply here in addition to our points at paragraphs 2.1.3 and 2.1.4 above).
- 2.2.2 Paragraphs 4.18 to 4.34 of the ELSU assess and score the merits of potential employment locations against a series of objective measures (proximity to the strategic highway network, proximity to key local routes, prominence, access to public transport, planning status, access to services, constraints, environmental setting, flexibility and availability). Paragraph 4.23 (page 147) confirms the continuing strategic success and future prospects for further delivery of employment at the Sarncliffe Enterprise Zone, demonstrated by it achieving the second highest score (76/100) across the whole Plan area.
- 2.2.3 Furthermore, table 44 'Employment Sites Schedule' (pages 137 to 138 of the ELSU) states that, in respect of the Sarncliffe Enterprise Zone, *'The National Cyber Force Campus will now take up a high proportion of the remaining land and it is not clear what, if any, land will remain to meet further requirements.'* This finding is particularly significant and it supports the position of Lancashire County Council as we describe above in our paragraphs 2.1.9 and 2.1.10.
- 2.2.4 Having regard to our comments above, together with those at paragraphs 2.1.3 and 2.1.4 above, we consider that the conclusions of the Employment Land Review Update are not soundly based and that this important evidence base document should be re-visited to take account of current circumstances and to recognise the need for the Plan's employment policies and allocations to be more ambitious, in particular to identify further land to allow the Sarncliffe economic cluster to expand and achieve its

full potential for economic growth and job creation, in line with national and Lancashire wide strategic objectives.



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