

## Central Lancashire Local Plan

Examination Hearing Statement for Blackburn with Darwen Borough Council  
Representor ID: D03  
Matter 9: Employment Land Need and Allocations

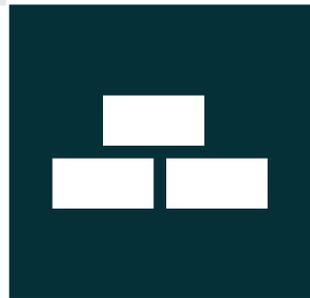
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## Quality Assurance

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 9: EMPLOYMENT LAND NEED AND ALLOCATIONS.

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

### 2.1 Question 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 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?

2.1.1 As we stated in our response to Matter 2, the identification of potential site allocations was done through the SHELAA, yet the evidence base document Ho16 'Site Selection Process' confirms that all Green Belt sites were discounted at the earliest stage of the SHELAA process, unless they were previously developed. For the reasons that we explain elsewhere, we consider that the Plan should be paused to allow a Green Belt review to take place, so that sustainable grey belt sites can be identified to help meet the Plan area's local housing and employment needs in full.

2.1.2 Our other concern is that the selection of site allocations appears to have been supply-led, with all sites identified in the SHELAA as suitable, available and achievable subsequently being allocated. There is no evidence that sites were selected in accordance with an overarching strategy directing development in accordance with wider objectives for sustainable growth or based on where need exists or is likely to arise.

2.1.3 In relation to the final bullet point within question 2.1., we showed in detail in our responses to Matter 8 that, in determining employment need, the Plan has failed to take adequate account of regional and national growth strategies.

### 2.2 Question 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?

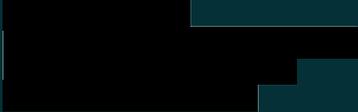
2.2.1 We have no specific comments in response to this question.

2.3 Question 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?

- 2.3.1 We await the response from the three Councils in respect of the first two parts of this question, as the Plan and its evidence base is unclear on these points in our view.
- 2.3.2 In respect of the last part of the question, for all the reasons we described in our response to Matter 8, the draft Plan does not make appropriate provision for the future employment needs within the three local authorities for the Plan Period.



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