

Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012



Regulation 19 Pre-Submission Plan

REPRESENTATION FORM

Part B: Please use a separate sheet for each representation you wish to make

Name or Organisation:

FI Real Estate Management Ltd

3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

Comment being made against:	Reference (please provide)
Policy:	Policy EC3 Employment Allocations Preston
Paragraph:	
Development Site:	
Policies Map:	
Evidence:	
Other (Please state):	

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		

a) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>
3) Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Four allocations are referenced in draft Policy EC3; the representor has no comment on site EC3.1 or site EC3.4 in connection with its wider representations on the lack of strategic employment land as neither site is capable or suitable in size, location and access to provide for a sub-regional logistics operation to meet need in the market, as evidence in the appended Iceni Report.

Site EC3.2 Preston East Junction 31A is being promoted by Monte Blackburn for up to 86,462 sqm of floorspace, including one large-scale unit up to 59,200 sqm according to the EIA Scoping request (06/2025/0208). In that scoping exercise National Highways highlighted a key site constraint at Junction 31A that it is both near / at capacity and it has no northbound access. The representor considers this constraint as significant and suggested re-routing of northbound traffic via Junction 30 presents its own constraint and reduces the attraction of the site for a major logistics operator. It is unclear how the applicant will address the significant strategic highway constraint and this places uncertainty that a large-scale logistics unit would be delivered in the final development scheme.

Site EC3.3 11 Roman Road Farm has outline planning permission (06/2022/0745) for mixed B2/B8/E(g)(i) development. Approved parameter plans indicate 12 plots ranging in size from 0.8 to 2.3 ha; none suitable for sub-regional logistics operations and the site configuration, access and ecology mitigation would preclude a combined development area being achieved. It is notable the outline consent requires improvements to Junction 31A and it is unclear how delivery of this site allocation with EC3.2 will impact the strategic highway network in combination.

It therefore can be concluded that the 66 hectares of employment land at Preston East has limited ability to deliver developable site(s) to meet sub-regional scale logistics needs across the plan period. It reinforces the representors view and overall concerns on the employment land requirement set out in the CLLP and related employment land/ development strategy that goes with it. The representor considers a fundamental review and reset is required on this strategically important topic.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is the representors view that insufficient employment land to meet identified needs for large-scale, sub-regional logistics opportunities, as identified in the appended Icen Report, and the Local Plan would be improved in its soundness, effectiveness and justification through allocation of such land at the representors' site at Stanworth (separate representation for new allocation policy).

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	Please check the relevant box
No, I do not wish to participate in hearing sessions	<input type="checkbox"/>

Yes, I wish to participate in hearing sessions



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The amendment is inter-related with wider spatial vision, strategy and economic policy representations made, and the representation here and in the appended Icen Report is fundamental to our criticism of the evidence base and approach of the Local Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

Forms must be received by midnight on Monday 14 April 2025.

