

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
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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 EC6 Protection of Existing Employment Sites
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 type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input checked="" 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.

This policy seeks to protect existing employment sites for employment use and states that the loss of existing employment sites will only be supported where evidence demonstrates that one of the following tests has been met.

The first of these is that the use of the site/premises for employment use is no longer viable and it is not commercially viable to refurbish/reconfigure the premises or redevelop the site for other employment purposes. There are many sites in the Central Lancashire Authorities that fall into this category by reference to their age, profile, size and suitability for the needs of modern employment/industry. This suggests to us that a number of sites/areas of land will be lost for employment use notwithstanding the assumption of Policy EC7. Indeed, many sites of this nature are more suitable for housing, (a use that is a pressing priority of government), and a significant source for windfall housing delivery which the CLPP relies upon in greater numbers in the latter part of the plan period in its housing trajectory.

The representor has no objection to the tests (a) to (c) as set out in the emerging policy which broadly assess viability; reconfiguration and mixed-use options in part (a), accessibility / suitability in part (b) and marketing in part (c).

In our view, based on knowledge of the profile of many of the Central Lancashire Authorities older industrial and employment estates, it will not be difficult to demonstrate that a number of existing sites are unsuitable for employment use going forward. This suggests that a number of sites will be lost to other uses, most probably residential. And this further suggests that an additional allowance should be made to ensure the loss is compensated for by number of new, suitable sites, capable of

meeting the needs of modern industry etc. We propose an allowance of 15 ha to be split between the three Central Lancashire Authorities depending upon the loss of existing sites.

(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.

We consider an additional allowance should be made to ensure the likely loss in existing employment land is compensated for by number of new, suitable sites, capable of meeting the needs of modern industry etc.

We propose an allowance of 15 ha to be split between the three Central Lancashire Authorities depending upon the loss of existing sites.

(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	<input checked="" type="checkbox"/>

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 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.

