

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: | |
| Paragraph: | |
| Development Site: | |
| Policies Map: | |
| Evidence: | Employment Land Study – Land Supply and OAN Update 2024, BE Group, February 2025 |
| 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 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.

The representor submits the attached report Land adjacent to M65 J3, Stanworth, Chorley, prepared by ICENI, April 2025 as a critical review of the BE Group 2024 Update and previous version. The Executive Summary sets out the following conclusions:

- Illogical progression of BEG employment evidence updates supporting the plan. Specifically that through using different data and historic periods of assessment, the reported employment need has fallen. This is against a background of market signals for industrial need which identify ongoing low vacancies rates and rising rents, pointing to an increased not decreased requirements. The inconsistency in methodology is unsuitable and opaque in terms of Plan making.
- The employment evidence does not consider strategic employment needs which the PPG expects that plan making authorities should undertake (Paragraph: 031 Reference ID: 2a-031-20190722). This is stated explicitly in past iterations of the evidence but not in the 2024 work, albeit that the strategic supply is excluded from the balancing implies that strategic need is also not considered. The IcenI evidence does consider strategic need through the lens of a wider property market areas assessment, and finds a high level of need that the BEG work.
- IcenI's assessment of strategic needs taking into account demand and supply and points to the need for additional large scale facilities in Central Lancs and notably Chorley. This is defined as focusing on the need for larger units of 9,300 sqm

or 100,000 sqft and above, over a property market area larger than Central Lancs considered suitable for the occupiers of such units.

Note the that ICENI report has been prepared using the NPPF (December 2023) version and prior versions of PPG for consistency to the transitional arrangements under which the Local Plan is being prepared.

(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.

In connection with parallel representations on strategic employment land provision in the Local Plan, it is considered that the evidence base that is provided though the BE Group is inadequate and requires full reconsideration to correct inconsistency, methodology and omission of consideration of strategic employment needs in line with national planning policy (transitional arrangements).

That evidence update should find additional need for larger employment units to meet demand in Central Lancashire, notably in Chorley.

(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:

Discussion and update of the evidence base to the Local Plan is fundamental to its soundness. Indeed, without update it may not be possible for the Examination to reach a satisfactory conclusion.

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.

