

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:	1.9
Development Site:	
Policies Map:	
Evidence:	
Other (Please state):	01 Introduction – Preparation Process

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input type="checkbox"/>	<input checked="" 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 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.

It is the view of FI Real Estate Management (“FIREM/representor”) that the Regulation 19 version of the Central Lancashire Local Plan (“CLLP”) does not satisfy to the letter relevant Regulations pertaining to the production of development plans, nor guidance in NPPF (and PPG) on the same, nor treat local investors and developers with the respect they deserve.

Specifically we have concerns that the approach being followed by the Central Lancashire Authorities allows it to rely on the advice and guidance on the preparation of development plans set out in the version of NPPF dating from December 2023 yet policies in the Regulation 19 version of the CLLP rely on current national planning policy guidance. There is an obvious conflict.

In addition, the basis of the CLLP, by reference to the then applying Local Development Scheme (“LDS”), was always that the Regulation 18 stage would be carried out in two parts – Part One and Part Two. Part One of the Regulation 18 version of the CLLP was published in 2023. It dealt with many topics, including some important site related matters, which extended to possible allocations, at a strategic level. In many ways this version of the plan, by reference to its introduction, was specifically devoid of detail and specific proposals to facilitate the addressing and consideration of these matters through a Part Two Regulation 18 CLLP.

However, instead the Central Lancashire Authorities have gone straight to Regulation 19 stage which will lead to the submission of the plan to the Secretary of State (“SoS”) following which it will be examined.

Many parties, including this representor, designed and moulded the representations they made at Stage One Regulation 18 stage, with a view to following them up with more detailed representations at the Part Two Regulation 18 stage. This is particularly relevant to FIREM in connection with Policy Direction 2: Spatial Approach of the Part One Regulation 18 CLLP. This committed to investigate options for a site to deliver a major logistics facility to serve Chorley based on identified needs set out in the Employment Land Study Update (“ELS Update 2022”), prepared by BE Group, February 2022.

By preparing a further, revised Update of the ELS in February 2025, which as we go onto confirm deliberately and artificially reduces the employment land requirement for the Central Lancashire Authorities, it dismisses the need for a major logistics facility to serve Chorley. This matter has effectively been ‘managed’ out of the CLLP, and FIREM has lost the opportunity to present its case for such a facility at the most appropriate stage of plan preparation.

The representor considers the Plan may not be legally compliant to procedural requirements and is unsound through a failure to be positively prepared, justified or effective.

(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.

The subject of our representation is not capable of correction through modification of the Local Plan.

(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:

Should the Local Plan proceed to Examination the matter is fundamental to opening hearing session on whether the plan is procedurally compliant which requires public discussion.

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.

