

# 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:	2.11-2.12
Development Site:	
Policies Map:	
Evidence:	
Other (Please state):	02 Area Profile – Economic Prosperity

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.

The representor agrees that achieving economic prosperity is a key priority for the Central Lancashire Authorities and the Lancashire 2050 Initiative which is the strategic framework for the County.

It is clear that new economic development and gains from increased productivity will lead to greater prosperity for the CLA community – including income, health and wellbeing and environmental sustainability.

We note that the Regulation 19 CLLP suggests that inclusive economic growth should be distributed fairly across society and create opportunities for all, which suggests allocations should be sensibly and strategically distributed across all parts of the Central Lancashire area.

The representor, by reference to the Regulation 19 version of the CLLP, does not think this is the case. For example, reference to Part One Regulation 18 version of the CLLP, including its employment land evidence base set out in the ELS Update 2022, suggests there is a proven need for a logistics facility to serve Chorley Borough. However, the Regulation 19 version of the CLLP, including by reference to the ELS Update 2025 it relies on, makes no provision for it.

The Part One Regulation 18 version of the CLLP, through Policy Direction 2: Spatial Approach, confirmed the desire to promote economic development at accessible locations, including a logistics facility along the M65 in Chorley Borough.

Connected with this, we also note that the Lancashire Growth Plan 2025-2035, prepared by Lancashire Combined County Authority (“LCCA”), February

2025, identifies the representor's site at Stanworth (land north east of M65 J3) as a site/development that can 'underpin conditions for growth' as part of Blackburn, M65 Junction 3 cluster (Appendix 1 – Lancashire's Major Project Pipeline Spring 2025; Ibid pp.41). We note that the Lancashire Growth Plan is supported by the three Central Lancashire Authorities alongside the constituent bodies of the LCCA comprising Lancashire County Council, Blackburn with Darwen Council and Blackpool Borough Council.

In addition, as we go on to confirm in representations concerning Policy EC1 (Strategic Policy): Scale of Economic Growth, which deals with employment land supply generally, we have serious reservations regarding the loading of a substantial amount of employment land through at the Preston West site (Policy SS5: Strategic Site Allocation - Preston West; 63.3 ha) and at Cuerden (Policy EC6: Mixed Use Allocations South Ribble; 50.3 ha). These representations concern the fact that, with regard to Preston West, no development can take place until significant infrastructure upgrades and new infrastructure is provided, and the policy itself notes that a significant amount of development might not come forward until post the plan period, i.e., after 2041. With regard to Cuerden, we understand that much of the available site area identified for employment development is to be used for a major new hospital development, which will seriously diminish the amount of available land for employment development, which is the primary purpose of the allocation in the evidence to this Plan.

By our estimations, if half the allocated land for employment at Preston West (roughly 30 ha) and Cuerden (roughly 25ha) does not come forward for employment development or within the plan period, the CLLP will be some 55 ha down on the Plan's employment requirement.

In addition, the previously identified need for a logistics facility to serve Chorley on the M65, identified through the Part One Regulation 18 version of the CLLP, which cannot be met anywhere other than in Chorley Borough and on the M65, won't be met, which also contributes towards our assessment that the CLLP has to be regarded as flawed and unsound as failing to be positive prepared, justified or effective.

We would also point out the potential shortfall could be greater than 55 ha as this excludes the need for a logistics site in Chorley and the opportunity along the M65.

The representor accepts that Central Lancashire is an attractive place to live, work and invest in, and it has invested a considerable amount in Chorley Borough and the wider area over the last 30 years. It also agrees with that the logistics sector has been a fast growing area of the local economy in recent times, and needs to experience continued growth to meet demand, which was reflected in the Part One Regulation 18 version of the CLLP and ELS Update 2022. This begs the question why the impetus

for such a facility that was clearly identified in the Part One Regulation 18 version of the CLLP is not carried through in the Regulation 19 version of the CLLP.

(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.

To deal with some of its concerns as set out above, the representor proposes the following changes to paragraphs 2.11 and 2.12 of the Regulation 19 version of the CLLP as follows:

**Proposed new text:**

*2.11 Achieving economic prosperity is a key priority for all three Councils and the Lancashire 2050 Initiative, which is the strategic framework for the County. The Lancashire Independent Economic Review identifies how the economic geography of Lancashire is polycentric (multicentred). The Review also highlights how gains from greater productivity will lead to greater prosperity for Lancashire's people – including income, health and wellbeing, and environmental sustainability. Inclusive economic growth should be **appropriately** distributed fairly across society and create opportunities for all **to meet identified needs and where it can deliver the greatest range and weight of benefits.***

**Proposed new text:**

*2.12 Central Lancashire is an attractive place to live, work and invest and the area has major strengths in the aerospace, advanced manufacturing, and engineering sectors and significant employment opportunities in the growing financial and professional services, and health and, social care sectors. The logistics sector has been the fastest growing area of the local economy in recent times, ~~and this is expected to see continued growth~~ **but new floorspace and development opportunities are needed to meet known demand.** The University of Central Lancashire (UCLan) has also grown substantially over the last 20 years.*

(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:

Matters of employment land need and delivery of strategic development opportunities are central to the consideration of soundness of the plan for 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.**

