

# 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**

<b>Name or Organisation:</b>	<b>FI Real Estate Management Ltd</b>
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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:	SS5: Strategic Site Allocation – Preston West
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.

This policy promotes a Strategic Location for a residential led mixed-use development for 450 homes until 2041, and 1,400 additional homes beyond the plan period subject to masterplanning, and up to 63.3 ha for employment uses, together with the infrastructure to facilitate the creation of a sustainable community.

As already confirmed regarding in our representations about 02 Area Profile, (paragraphs 2.11 – 2.12, Economic Prosperity), the representator has considerable concerns about this allocation being brought forward within the plan period for several reasons as follows:

- The land is in multiple ownership which is very often a serious impediment to delivery of comprehensive schemes which are masterplanned.
- The fact a development framework is required for the whole allocation (Phase A and Phase B) to ensure the effective coordination between multiple land interests so as to deliver an integrated, whole-site approach to the provision of access, community facilities, open space and natural recreational greenspace for habitat mitigation, is an acknowledgement that delivery cannot be guaranteed in the short term nor over the plan period.
- Phase B contains Ashton and Lea Golf Club. Development of this phase cannot occur within the plan period. This approach is fundamentally flawed. The CLLP

should effectively plan for the development need of the plan over its life, 2025-2041. This alone makes this aspect of the plan unsound.

- Substantial new and upgraded infrastructure is required to make the allocation work. To our knowledge no feasibility nor viability assessments have been prepared to confirm that new development alone will be capable of funding the necessary long list of new and improved infrastructure to support the level and type of development being proposed, nor if this can be achieved within the plan period.
- Development areas within Phase A and B of the site have planning permission for the delivery of Cottam Parkway Train Station. However, it is acknowledged that further work is required to demonstrate that development needs linked to this, particularly access to Phase B of the site, can be delivered.
- We understand that no work has been done to confirm how BNG requirements can be delivered to achieve the necessary mitigation to allow the levels of development proposed under the policy to be achieved. It is our experience with regard to large, strategic sites of this nature, that commonly expected levels of development that are promoted under the related policy cannot be achieved because of the effects of BNG (costs and impacts on viability through amount of land required to deliver BNG needs or costs for delivery of BNG off site).
- The planned development could seriously impact on a Special Protection Area suggesting this area of land, and its hinterland, should not be considered for development the effects of which would be to further reduce the potential of the wider site to deliver the expected amount of development.
- Part of the site is a functional flood plain. Clearly, this area of land is not suitable for development and potentially adjoining land might also be unsuitable for certain forms of development, which could also lessen the overall site's potential for the amount of development proposed.
- There also appears to be serious heritage related constraints to overcome which, could well hasten the imposition of wide 'development free zones,' also having the effect of reducing the development potential of the wider site.
- It is likely that a large part of the site will be found to comprise high quality agricultural land which should be kept free of development which will also reduce the potential of the site to deliver the required amount of development.

- The need to satisfy policy on affordable housing will further impact on overall viability as will the fact the policy requires a very high quality and standard of development across the whole development.
- Finally, with regard to the potential of the site to deliver the amount of land planned for employment development, 63.3 ha, we question the attractiveness of the site (location and profile etc.) to the market. The land is located in a relatively constrained, non-strategic location, which is well positioned to serve western/south west Preston, but nowhere else. It certainly does not have the profile of allocated sites located east of the M6 or close to other motorways of the Central Lancashire area. Notwithstanding all of the other constraints that affect the land's potential for employment development (and housing development), the representor, has concerns regarding the site's attractiveness to the local and sub-regional market for the new employment land, which could see the site allocated for development but not brought forward for development, meaning the CLLP's wider development and growth strategy for the plan area will not be delivered. And, as is very typically the case, developers that might commit to the site will claim the need for non-employment enabling developments to bolster viability, further reducing the amount of employment land that the CLLP will deliver.

(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.

Based on response to Question 5 above, the representor requires the amount of land proposed to be allocated through this policy for employment to be reduced by at least 50% (to no more than 30 ha) to allow other more suitably located and profiled sites, which are better positioned to meet the ambient need for different forms of employment development in Central Lancashire, to be allocated for development. This includes the representor's site at Stanworth, immediately north east of Junction

3 of M65, for logistics. We propose an approach, justification and scope of new policy plus allocation for site in separate representations to draft Policy EC2.

**Proposed amendments to Policy SS5, part 1:**

1. Land is identified on the Policies Map at the Preston West Strategic Location for a residential led mixed-use development comprising the erection of approximately 450 homes until 2041 with up to 1,400 additional homes (to include provision for older people) to be delivered beyond the plan period subject to masterplanning, and up to ~~63.3~~**30** ha for employment use class types B2, B8 and E(g), together with the infrastructure to facilitate the creation of a sustainable community.

(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.

***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.**

