

# 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:	HS1: (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements
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.

The representor questions whether the amount of housing proposed through the CLLR (housing land requirement) is sufficient in terms of quantum over plan period and is distributed in the most appropriate places to meet demand.

Work by Icenic on behalf of the representor, *Land adjacent to M65 J3, Stanworth, Chorley Report*, ICENIC, April 2025, (appended), confirms that the employment land requirement is inadequate in terms of quantum, and that the complementary employment land development strategy is flawed in terms of where and for what purpose land is allocated for this use.

This suggests that there is clear need for the CLLR to increase its employment land requirement and allocate sites that meet need and are in the best locations if the plans economic development and general growth targets are to be met.

The corollary of this, to ensure that the increased employment land requirement can be appropriately supported by a local workforce, ideally living nearby (so as to achieve sustainable patterns of development), the target figure of 23,652 dwellings between 2023-2041 needs to be increased substantially. And we also question whether the proposed split of this over the plan period between the three Central Lancashire Authorities, 334 for Chorley per annum, 520 for Preston and 460 for South Ribble, is appropriate.

Supporting evidence in TP1: Approach to Housing, DLP, sets out the housing requirement under the Employment-led Housing Study, (combined total 22,266 or 1,237 dpa, Table 2), the redistribution between the three authorities, (Table 3), and

finally an uplift to meet the minimum 80% of the Local Housing Need as required under NPPF 2024: Annex 1 transitional arrangements, (Table 4). Taking a step back the proposed redistribution is justified to reflect *inter alia* the delayed progress on City Deal sites, focus on town centre regeneration and avoidance of Green Belt and open space constraints. This leads to a substantive reduction in requirement for Chorley of 30% (410 dpa vs 287 dpa, comparing Tables 2 and 3), and increases of 13% and 17% for Preston and South Ribble respectively. Yet, at Table 4 when the uplift to meet the transitional arrangements – an exercise that is not part of any of the prior evidence but a necessity to submit the Regulation 19 plan by the 12<sup>th</sup> March 2025 deadline – we see 61% of the 77 dpa uplift (47 units) is applied to Chorley.

No reason or justification is given to why the uplift follows a totally different approach to redistribution, other than that the three authorities had reviewed the situation and consider this to be justified under transitional arrangements. This is not a justified approach nor is it satisfactory evidence. It suggests a contrived redistribution of housing requirement and it shows no clear evidential link to the Employment-led Housing Study from which it derives which is supposed to link the housing requirement to the employment growth in each authority. It suggests that Chorley is significantly under-provided for housing growth in the plan period and disconnected from employment growth. This will lead to unsustainable patterns of development.

(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 the response to Question 5 we consider that the combined authorities need to fully reconsider its housing and employment land evidence to satisfactorily evidence needs and to then provide spatially for those needs in the allocation and distribution of those allocations within the Local Plan. This would include a necessity to undertake a Green Belt land assessment.

(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.**

