

# Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)  
(ENGLAND) REGULATIONS 2012



## Regulation 19 Pre-Submission Plan

### REPRESENTATION FORM

The easiest way to submit your comments is online at <https://centrallocalplan.citizenspace.com/planning/cllp-regulation-19-representation-period/> . Alternatively, you can scan the QR code on the right, using a smartphone, to be taken to the webpage. **We would encourage you to use the online form wherever possible.** Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



#### Submission form

This form has two parts-

**Part A** – Personal Details: need only to be completed once. **We will not be able to accept responses where personal details are not provided.**

**Part B** – Your representation(s): Please fill in a separate sheet for each representation you wish to make relating to each individual policy.

You will be asked to give details of why you consider the policies of the Local Plan to be sound or unsound, please be as precise as possible. You will also be asked to set out the modification(s) you consider necessary to make the Local Plan policies sound in respect of any soundness matters you have identified. You will need to say why each modification will make the policy 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.

#### Privacy Notice

If you have any questions about how the Central Lancashire Authorities will handle your personal data, please see our Data Protection Policy Statement or contact us via email at [centrallancashireplan@chorley.gov.uk](mailto:centrallancashireplan@chorley.gov.uk)

- Chorley Privacy Statement: <https://chorley.gov.uk/privacy>
- Preston Privacy Statement: <https://www.preston.gov.uk/article/1231/Data-protection-policy-statement>
- South Ribble Privacy Statement: <https://southribble.gov.uk/privacypolicy>

**Part A: Personal Details\*****We will not be able to accept responses where personal details are not provided.**

1. Please provide your contact details.

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in the Person Details boxes below but complete the full contact details of the agent in Agent Details.*

	Representor Personal Details	Agents Details (if applicable)
Title	Mr	
First Name	Neil	
Last Name	Lucas	
Job Title (where relevant)	██████████	
Organisation (where relevant)	AshtonHale	Logik Strategic Land
Address Line 1	██████████ ██████████ ██████████	
Address Line 2	██████████████████	
Town	██████████	
Postcode	██████████	
Telephone number	██████████████	
Email address	██████████████████████████████	
What authority do you live / work in? (Chorley, Preston, or South Ribble)	████	

**Part B: Please use a separate sheet for each representation you wish to make**

**Name or Organisation:** Logik Strategic Land (via AshtonHale)

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:	Policy SS2: Settlement Hierarchy
Paragraph:	
Development Site:	
Policies Map:	
Evidence:	Representations set out why Logik considers the supporting evidence within the “Central Lancashire Employment Land Study - Land Supply and OAN Update 2024” to be deeply flawed.
Other (Please state):	Please refer to detailed response included within the enclosed document: “Representations to Central Lancashire Local Plan Regulation 19 Consultation” (dated 14 April 2025) prepared by AshtonHale.

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
2) Sound  (If you check ‘No’, please also confirm below which of the ‘tests’ it fails to meet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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.

Please refer to detailed description within Section 5 of the supporting Representations to Central Lancashire Local Plan Regulation 19 Consultation (dated 14 April 2025) prepared by AshtonHale.

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.

Logik considers that Policy SS2 should be amended to reflect the potential for strategic development around Cuerdale / Salmesbury within the plan period. Logik's suggested amendments to the policy are in **bold** below:

*"Policy SS2: Settlement Hierarchy*

*The scale and location of development growth and supporting investment across Central Lancashire will reflect the following settlement hierarchy:*

*a) The Preston Urban Area (Tier 1) will be the primary focus for development growth and investment, the largest amount of new development will be directed here. This will be delivered through a combination of redevelopment and regeneration activity and major new*

development to meet strategic general housing, employment, and commercial development needs.

b) Key Service Centres (Tier 2), including the towns of Leyland and Chorley and **development in the** South Ribble **Urban Area** will be the secondary focus for development, complementing the role of the Tier 1 Urban Area. This will be delivered through allocated sites in and adjoining the towns, windfall sites and town centre renewal activity to meet development needs.

c) Urban Local Service Centres (Tier 3) will be a tertiary focus for development and accommodate new development and investment within settlement boundaries. The scale and type of development will be appropriate to the settlement size and reflect its characteristics.

d) Rural Local Service Centres (Tier 4) will accommodate limited new development, appropriate to the settlement size, to help meet local housing and employment needs and help sustain local services and facilities.

e) Smaller Rural Villages and Hamlets (Tier 5) will accommodate more limited new development and investment, other than on the sites identified on the Policies Map.

Table 1: Settlement Hierarchy should also be modified accordingly to reflect the above, with the text relating to Tier 2 amended to read:

*“Land within: a) Leyland and ~~the~~ South Ribble **Urban Area** (Penwortham, Walton-le-Dale, Lostock Hall, **Cuerdale**, and Bamber Bridge)”*

The proposed modification will address the need for additional employment land in Cuerdale. For further commentary, please refer to the supporting Representations to Central Lancashire Local Plan Regulation 19 Consultation (dated 14 April 2025) prepared by AshtonHale.

**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:

Fundamental to Logik's concerns about the soundness of the draft CLLP are the findings of a detailed report by Wisser Consulting, which reviewed the employment land evidence base prepared by the BE Group, covering both employment land need and supply. In particular, Logik considers the employment evidence base which has underpinned strategic policies SS2 (Settlement Hierarchy) and EC1 (Scale of Economic Growth) to be deeply flawed, rendering the draft local plan unsound. Logik therefore wishes to participate in the hearing sessions to set out its case and the need to reconsider the strategic site allocation at Cuerdale.

***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.

**Part B: Please use a separate sheet for each representation you wish to make**

**Name or Organisation:** Logik Strategic Land (via AshtonHale)

**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.

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Comment being made against:	Reference (please provide)
Policy:	
Paragraph:	
Development Site:	New Strategic Site Allocation for Cuerdale
Policies Map:	
Evidence:	Representations set out why Logik considers the supporting evidence within the “Central Lancashire Employment Land Study - Land Supply and OAN Update 2024” to be deeply flawed.
Other (Please state):	Please refer to detailed response included within the enclosed document: “Representations to Central Lancashire Local Plan Regulation 19 Consultation (dated 14 April 2025)” prepared by AshtonHale.

**4. Do you consider the Local Plan is:**

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input 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).

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For the multitude of reasons set out in the supporting representations, Logik strongly considers that a new Strategic Site Allocation should be insert to reflect the strategic requirements for employment-led development at Cuerdale.

Logik does not proposed any modifications to the general thrust of “Strategic Site Allocations – Introduction” at paragraph 3.22, which states that: “Planned new development at a strategic scale brings a range of benefits, such as securing infrastructure alongside growth, and provides an effective source of development delivery over time. Strategic sites are central to the delivery of the spatial strategy, Policies SS1 and SS2, and achieving sustainable development.” However, Logik strongly suggests that a new Strategic Site Allocation, and associated new Policy SS7 (Cuerdale), to address the strategic potential and requirements at Cuerdale.

Logik would be willing to work with the CLA (and other stakeholders) to provide details to help draft the new Strategic Site Allocation, however, considers that this

should be based on its submitted outline planning application and the potential already considered by the CLA for the wider Cuerdale Garden Village Site Profile (Site Profile 26) in the Preferred Options – Part 1 draft CLLP 9 (included for ease of reference at Appendix 4). Again, Logik reiterates that there is no clear evidence to support this wider site not being progressed other than a reliance on deeply flawed evidence.

The proposed modification will address the need for additional employment land in Cuerdale. For further commentary, please refer to the supporting Representations to Central Lancashire Local Plan Regulation 19 Consultation (dated 14 April 2025) prepared by AshtonHale.

**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.**

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Fundamental to Logik’s concerns about the soundness of the draft CLLP are the findings of a detailed report by Wisser Consulting, which reviewed the employment land evidence base prepared by the BE Group, covering both employment land need and supply. In particular, Logik considers the employment evidence base which has underpinned strategic policies SS2 (Settlement Hierarchy) and EC1 (Scale of Economic Growth) to be deeply flawed, rendering the draft local plan unsound. Logik therefore wishes to participate in the hearing sessions to set out its case and the need to reconsider the strategic site allocation at Cuerdale.

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Comment being made against:	Reference (please provide)
Policy:	Policy EC1: Scale of Economic Growth
Paragraph:	
Development Site:	
Policies Map:	
Evidence:	Representations set out why Logik considers the supporting evidence within the “Central Lancashire Employment Land Study - Land Supply and OAN Update 2024” to be deeply flawed.
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For the multitude of reasons set out in the supporting representations, Logik strongly considers that the evidence base used to provide the scale of economic growth required within the plan period, and in South Ribble in particular, is deeply flawed.

Logik, therefore, strongly considers that modifications are required to Policy EC1 (Strategic Policy): Scale of Economic Growth to reflect the true scale of the employment land required to support both local and wider strategic employment needs, and that economic growth and employment land supply will be provided for through existing and new employment allocations and extant planning permissions. Logik considers it imperative that the requirements need to be based on a sound evidence base and consider now the implications of the NCF, acknowledging the need for a Strategic Site Allocation at Cuerdale.

Logik considers that Policy EC1 should be amended to reflect the true employment needs of the area and the potential for strategic development around Cuerdale / Salmesbury within the plan period. Logik's suggested amendments to the policy are in **bold** below:

*"Policy EC1 (Strategic Policy): Scale of Economic Growth*

*Employment Land Supply*

1. Over the Plan period, provision will be made for a minimum of **173 [tbc]** hectares of employment land to support both local and wider strategic employment needs. The objectively assessed need is summarised below:

**[Table to be updated in accordance with robust evidence base]**

2. Economic growth and employment land supply will be provided for through existing and new employment allocations and extant planning permissions.

*Employment Land Distribution*

3. Preston City Centre will be the focus for regional and sub-regional office development with a secondary focus in Leyland and Chorley Town Centres, particularly Chorley's proposed new civic square.

4. Policies EC2-6 identify employment and mixed-use allocations, which will meet the need for additional office accommodation and provide sufficient quantity, range and choice of sites to meet industrial/warehouse needs throughout the Plan period and help deliver economic growth.

5. The Salmesbury Advanced Engineering and Manufacturing Enterprise Zone **and the Cuerdale Strategic Site Allocation** will continue to be a regionally significant site for employment. Local Development Order(s) (LDOs) will continue to help deliver the Salmesbury Enterprise Zone. Development likely to compromise its delivery or operation of the Enterprise Zone will not be supported."

The proposed modification will address the need for additional employment land in Cuerdale. For further commentary, please refer to the supporting Representations to Central Lancashire Local Plan Regulation 19 Consultation (dated 14 April 2025) prepared by AshtonHale.

**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.

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***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.**

