

**Town And Country Planning Act 1990 - Planning Appeal**

**FORMER DXC TECHNOLOGY SITE, EUXTON HOUSE, EUXTON  
LANE CHORLEY PR7 6FE**

**By Bellway Homes Limited**

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**EMPLOYMENT LAND PROOF OF EVIDENCE OF VINCENT  
GEORGE SANDWELL**

**APPLICATION REFERENCE: 21/01475/FULMAJ**

**APPEAL REFERENCE: APP/D2320/W/22/3309262**

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## 1.0 INTRODUCTION

- 1.1 The following Proof of Evidence is prepared by Vincent George Sandwell on issues of employment land need in relation to planning application **21/01475/FULMAJ** for the redevelopment of the Former DXC Technology Site, Euxton House, Euxton Lane, Chorley for housing.
- 1.2 I have received instructions from Chorley Borough Council ('the Council') acting as the Local Planning Authority (LPA).
- 1.3 I am a Director at BE Ltd trading as BE Group, an economic and regeneration consultancy based in Warrington. My qualifications are a BSc degree in Urban Estate Management, and I am a Member of the Royal Institution of Chartered Surveyors and a registered valuer (RICS). I am based in Warrington and have 41 years' experience of the local property markets in the North West specialising in providing property market and agency advice with an emphasis on business parks and industrial estates.
- 1.4 For the past nine years I have led the company's economic and regeneration consultancy work with a particular focus on economic needs and employment land reviews. I have undertaken employment land reviews across England and Wales on behalf of local authorities, which provide an evidence base to the preparation of local plans. These require an assessment of economic need and market demand for employment land – land for office, industrial and warehouse uses – and assessments of the deliverability of employment sites to meet needs. I have also undertaken financial appraisals, testing the viability of commercial sites across England and Wales, for both private and public sector clients. I have supported a number of local authorities at Examination into their local plans, including Amber Valley, Charnwood, Flintshire, Sefton, Stroud, Vale of Glamorgan, Warrington and Wrexham. I have also provided written and verbal evidence at appeal for a range of sites, most recently for the Parkside development in St Helens.
- 1.5 Over 2017-2022 I project managed multiple employment land studies for the Central Lancashire sub-region of Chorley, Preston and South Ribble to support the emerging joint local plan. Specifically, those employment land studies were:

- CD6.3/CD6.4 Central Lancashire Employment Land Study (November 2017 – updated April 2019)
- CD6.5 Central Lancashire Employment Land Study Update (February 2022)
- CD6.6 Chorley Market Update, prepared by BE Group (August 2022).

1.6 Supported by Christopher Wilson, Principal Regeneration Consultant at BE Group, and a resident of Buckshaw Village, I am familiar with Former DXC Technology Site, Buckshaw Village and other nearby developments successfully delivered.

### **Professional Witness Declaration**

1.7 I confirm that my Proof has drawn attention to all material facts which are relevant and have affected my professional opinion.

1.8 I confirm that I understand and have complied with my duty as an expert witness which overrides any duty to those instructing or paying me, that I have given my evidence impartially and objectively, and that I will continue to comply with that duty as required.

1.9 I confirm that I am not instructed under any conditional or other success-based fee arrangement.

1.10 I confirm that I have no conflicts of interest.

1.11 I confirm that I am aware of and have complied with the requirements of the rules, protocols and directions of the appeal.

1.12 I confirm that my Proof complies with the requirements of RICS – Royal Institution of Chartered Surveyors, as set down in the RICS practice statement ‘Surveyors acting as expert witnesses’.

### **Scope of Evidence**

1.13 This Proof addresses issues associated with Reason for Refusal One, namely that: *“The proposed development would result in an unacceptable reduction in the type and quantity of employment land supply contrary to Policy 10 of the Central Lancashire Core Strategy.”* The criterion of Policy 10 which the proposal did not satisfy were (a), (c), (d), (g) and (h):

*“a) there would not be an unacceptable reduction of the type, quality or quantity of employment land supply  
(c) the relative suitability of the site for employment and for the alternative use  
(g) convincing evidence of lack of demand through a rigorous and active 12 month marketing period for employment re-use and employment redevelopment  
(h) an assessment of the viability of employment development including employment re-use and employment redevelopment.”<sup>1</sup>*

1.14 Criterion of Core Strategy Policy 10 (d) *“the location of the site and its relationship to other uses”* are relevant to Reason 2 for Refusal and are discussed in the Proof of Evidence submitted by Richard Wood of Richard Wood Associates on behalf of Chorley Borough Council.

1.15 This Proof addresses the above issues, and in particular the ongoing market demand for the 3.02 ha of employment land which would be lost if the refused development progressed. The issues are addressed through the following chapters:

- Chapter 2.0: summarises the characteristics of the proposed development as relevant to the loss of employment land
- Chapter 3.0: summarises the policy context in relation to employment land need in Buckshaw Village and Chorley Borough
- Chapter 4.0: provides the case relating to Reason for Refusal One
- Chapter 5.0: conclusions.

1.16 A bibliography of documents referred to in this Proof is provided in Appendix 1.

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<sup>1</sup> CD 2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 88, Policy 10, Points a-h

## **2.0 PROPOSALS/BACKGROUND**

2.1 This chapter outlines the refused proposals for the Former DXC Technology Site as relevant to this Proof of Evidence.

### **The Former DXC Technology Site – Planning Application 21/01475/FULMAJ**

- 2.2 The application was made by Bellway Homes Limited (Manchester Division).
- 2.3 The site comprises 3.02 ha of land, mostly comprising hardstanding and car parking, surrounding, and associated with, the vacant Former DXC Technology office building, Euxton House. Located off Euxton Lane the appeal site falls within the Buckshaw Village Strategic Site as defined in CD2.1 Central Lancashire Core Strategy (2012)<sup>2</sup>. The appeal site falls entirely into Chorley Borough.
- 2.4 The refused application would, if delivered, result in the demolition of the existing 5,110 sqm E(g)(i) building and the erection of 108 no. dwellings, and associated parking and other infrastructure, leading to the loss of 3.02 ha of land, last in employment use, to C3 residential use.
- 2.5 This Proof of Evidence examines the need for the employment land that would be lost if the refused development is progressed.

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<sup>2</sup> CD 2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 143

### 3.0 CONTEXT

- 3.1 This section considers the policy context and supporting evidence that is relevant to determining need and demand and to which I have had regard when preparing this evidence. In particular I reference the relevant national guidance – NPPF and PPG which guides the assessment of need. I also review the relevant policies of the Adopted Central Lancashire Core Strategy and the economic needs and employment land reviews. The latter will enable me to assess the current need for employment land in Chorley Borough, and across the Central Lancashire sub-region, and the supply of employment land that has been allocated to meet that need. The findings will help identify whether the appeal site is still required to meet employment land needs in Chorley Borough, during the remainder of the Core Strategy period, and beyond.

#### National

##### **National Planning Policy Framework (July 2021) (CD 1.1)**

- 3.2 The National Planning Policy Framework (NPPF) July 2021 sets out the Government’s planning policies for England and how these are expected to be applied. It is a key material consideration. The economic objective of the NPPF, as set out in Paragraph 8, first bullet point is *“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity...”*.
- 3.3 Paragraph 8 advises that the objective of economic growth is interdependent with goals of social and environmental gain. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social, and environmental net gains should be sought jointly and simultaneously through the planning system.
- 3.4 Building a strong, competitive economy is the focus of NPPF Section 6 – to help create the conditions in which businesses can invest, expand, and adapt. Paragraph 81 notes that *“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*

- 3.5 Paragraph 83 notes that *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”*
- 3.6 Finally in Section 11 ‘Making Effective Use of Land’, Paragraph 123, point ‘a’ notes that the use of retail and employment land for homes in areas of high housing demand should be supported, but only if this *“would not undermine key economic sectors or sites...”*

### **Planning Practice Guidance**

Two relevant sections of guidance were produced in 2014 and updated over 2018-2020 – CD 1.2.2 ‘*Housing and Economic Land Availability Assessments*’ which provides a methodology of reviewing suitable land, and CD 1.2.3 ‘*Housing and Economic Needs Assessments*’, which provides guidance on how future needs can be determined. A third PPG CD 1.2.1 ‘*Effective Use of Land*’ provides advice on assessing whether existing employment allocations should be protected or reallocated for a more deliverable use.

### ***Housing and Economic Land Availability Assessments (July 2019) (CD 1.2.2)***

- 3.7 This PPG provides guidance on an assessment of land availability to identify *“a future supply of land which is suitable, available and achievable for housing and economic development over the plan period.”* (Paragraph 001). Such a study is used as evidence to inform decision making on use of sites, though it is for the Development Plan itself to determine the use of sites.
- 3.8 Paragraph 018 notes that a site or broad location can be considered suitable for employment development *“if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.”* Additionally, *“a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time”* (Paragraph 020).

### ***Housing and Economic Needs Assessments (December 2020) (CD 1.2.3)***

- 3.9 *“Policy-making authorities will need to prepare a robust evidence base to understand existing business need”* (Paragraph: 025). Needs can be measured through a range of methods including sectoral and employment forecasts and projections, demographically derived assessments of current and future local labour supply, analysis based on the past take-up of employment land and property and/or future property market requirements, consultations and studies of business trends (Paragraph 027). The available stock of land can be compared with the particular requirements of the area so that gaps in local employment land provision, by market segment, Use Class, etc. can be identified (Paragraph 029).

***Effective Use of Land (July 2019) (CD 1.2.1)***

- 3.10 Paragraph 001 notes that *“When considering whether there is a realistic prospect of an allocated site being developed for its intended use, it may be relevant to take into account factors such as the length of time since the site was allocated in the development plan, the planning history of the site including any planning applications or pre-application enquiries”* most notably *“whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price”* and *“whether there are any changes of circumstance that mean that take-up of the site for its intended use is now unlikely.”*

**Local**

**Development Plan**

- 3.11 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that if regard is to be had to the development plan for any determination, then that determination must be made in accordance with the plan unless material considerations indicate otherwise. For Chorley Borough the Development Plan comprises:
- CD 2.1 Central Lancashire Core Strategy, adopted July 2012, with a plan period of 2010-2026
  - CD 2.2 Chorley Local Plan 2012 – 2026, adopted July 2015.
- 3.12 The Replacement Central Lancashire Local Plan remains at a Preferred Options (Regulation 18) Stage at the time of writing.

- 3.13 Core Strategy Policy 1 sets out the locations for growth and investment across Central Lancashire. The appeal site is within the Buckshaw Village Strategic Site (Policy 1(ciii) – mixed use) “*where growth and investment will be concentrated.*”<sup>3</sup>.
- 3.14 Core Strategy Policy 9: Economic Growth and Employment sets the overall framework for economic growth across the three local authority areas identifying 454 ha of employment land between 2010 and 2026, to meet needs.<sup>4</sup> Buckshaw Village is included as a regionally significant employment scheme.<sup>5</sup>
- 3.15 Strategic Objective SO10 of the Core Strategy seeks “*to ensure there is a sufficient range of locations available for employment purposes.*”<sup>6</sup> Core Strategy Policy 10 seeks to protect all existing employment premises and sites last used for employment use. There will be a presumption that ‘Best Urban’ and ‘Good Urban’ sites will be retained for B use class employment use.<sup>7</sup> At Paragraph 5.36 the Core Strategy notes that all parts of Buckshaw Village “*are or have the potential to be ranked as ‘Best Urban’*”.
- 3.16 In the ‘*Chorley, Preston and South Ribble Employment Land Review to 2021 (2009)*’ the area of Euxton Lane including the appeal site and other E(g)/B-Class uses adjacent (study ref. Euxton Lane (40)) is specifically identified as ‘Good Urban’ in nature reflecting its strong location close to strategic roads.<sup>8</sup>
- 3.17 Policy 10 also notes that consideration will only be given to alternative uses where an applicant has clearly demonstrated that the following criteria have been met, that:
- a) there would not be an unacceptable reduction of the type, quality or quantity of employment land supply*
  - b) the provision and need for the proposed use*
  - c) the relative suitability of the site for employment and for the alternative use*
  - d) the location of the site and its relationship to other uses*
  - e) whether the ability to accommodate smaller scale requirements would be compromised*

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<sup>3</sup> CD 2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 50, Policy 1

<sup>4</sup> CD2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 87, Policy 9, Point (a)

<sup>5</sup> CD2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 87, Policy 9, Point (c)(iii)

<sup>6</sup> CD2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 82, Strategic Objective SO10

<sup>7</sup> CD2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 88, Policy 10, Paragraph 1

<sup>8</sup> CD 6.1 Chorley, Preston and South Ribble Employment Land Review to 2021 (2009) – Pg. 137

*f) there would be a net improvement in amenity.”*

3.18 “Any proposals for housing use on all employment sites/premises will need to accommodate criteria a) – f) and also be subject to:

*g) Convincing evidence of lack of demand through a rigorous and active 12 month marketing period for employment re-use and employment redevelopment*

*h) An assessment of the viability of employment development including employment re-use and employment redevelopment.”<sup>9</sup>*

3.19 As noted, the planning application was refused on the grounds that proposed development does not satisfy the criterion of Core Strategy Policy 10.

3.20 CD 2.2 Chorley Local Plan Policy EP1 identifies a requirement of 112 ha of employment land over 2010-2026 for Chorley Borough, 106.99 ha excluding relevant completions.<sup>10</sup> To meet this outstanding need 88.74 ha of employment land is allocated at EP1, with 30.4 percent of this, 26.98 ha, being in Buckshaw Village. The Buckshaw Village allocations comprise three sites of 5.40-13.80 ha each, focused to the immediate north of the appeal site, specifically:

- EP1.11 The Revolution – 13.80 ha
- EP1.12 Group 1 – 5.40 ha
- EP1.13 Southern Commercial – 7.76 ha.<sup>11</sup>

**Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (October 2012) (CD 2.3)**

3.21 This adopted SPD expands on the policy criteria and provides guidance on information that needs to be submitted in relation to the criteria of Core Strategy Policy 10, noted above. These include:

- *Criterion (a): there would not be an unacceptable reduction in the type, quality or quantity of employment land supply – An unacceptable change is one which would result in any reduction in the type, quality or quantity of employment land unless this type, quality or quantity has been identified as surplus within the*

<sup>9</sup> CD 2.1 Central Lancashire Local Development Framework, Adopted Core Strategy (2012) – Pg 88, Policy 10, Points a-h

<sup>10</sup> CD 2.2 Chorley Local Plan 2012 – 2026 Site Allocations and Development Management Policies Development Plan Document (2015) – Pg 33, Table 2 Employment Land Supply Requirements

<sup>11</sup> CD 2.2 Chorley Local Plan 2012 – 2026 Site Allocations and Development Management Policies Development Plan Document (2015) – Pg 34, Policy EP1

borough/settlement/area by the local authority annual monitoring process. This includes land presently vacant, but last used by E(g)/B2/B8 uses. *“Development proposals for uses other than employment must provide evidence that there would not be an unacceptable reduction in the type, quality or supply of employment land. The potential for all employment uses for a site should be considered before a planning application is made for any non-employment use.”*<sup>12</sup>

- *Criterion (c): the relative suitability of the site for employment and for the alternative use – “Any application for uses other than employment should include information to assess the relative suitability of the site for employment and for alternative uses.”* This assessment should consider the fact that there are considerable differences between different types and sizes of employment uses that the site could accommodate, through refurbishment or redevelopment, over time.<sup>13</sup>
- *Criterion (g): convincing evidence of lack of demand through a rigorous and active 12 months marketing exercise for employment re-use and/or employment redevelopment –* Again all possible employment uses which could be accommodated on the site need to be considered. Where a business, on the site, is coming to the end of its economic life, or has ceased trading altogether/vacated, the Councils *“will expect the land or premises to have been marketed for employment use before it can be considered for an alternative use.”* *“A lesser financial return on investment, relative to other development or reuse options, will not be sufficient to justify the site not continuing to be available for employment use.”*<sup>14</sup> The marketing criteria that the SPD expects applicants to follow, for the 12 month period of assessment, are set out below.
- *Criterion (h): an assessment of the viability of employment development including employment re-use and employment redevelopment –* Applicants will be expected to clearly demonstrate why they consider that new employment development cannot be achieved on the buildings and the site for reasons of financial viability. To satisfy criterion (h), the SPD expects applicants to:

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<sup>12</sup> CD 2.3 Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (2012) – Pg 9-10, Paragraphs 17-19

<sup>13</sup> CD 2.3 Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (2012) – Pg 15, Paragraphs 27-29

<sup>14</sup> CD 2.3 Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (2012) – Pg 19-20, Paragraphs 43-49

- *“Establish from 12 months of active marketing that prospective occupants have turned down the property because of the condition of the premises”*  
The Councils will not concede that the site is in poor condition unless this conclusion can be drawn from site marketing evidence
- *Establish that the costs involved in refurbishing or redeveloping the site for employment use are greater than the return that could be anticipated.”*  
Where the unviability can be established the Councils would also expect applicants to consider approaching funding agencies for support in considering if mixed use schemes might be more viable.<sup>15</sup>

*Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (October 2012) – Appendix 1: Requirements of a Marketing Strategy (CD 2.3)*

3.22 *“The marketing strategy should bring the availability of the site to the full notice of the local business community, for at least 12 months and should include as a minimum:*

- (a) The market price of the site/premises and an indication of this price relative to those prevailing for similar sites/premises in the local market, including details of an independent valuation;*
- (b) Details of any reductions in market price made during the course of marketing;*
- (c) The marketed use of the site - the Councils will expect employment sites to be marketed in a way that identifies all the options available in retaining the site in employment use and include all employment uses, which could be attractive to the commercial market in that area. This will include, where appropriate; the potential for refurbishment; redevelopment for new employment uses; sub-division, amalgamation or selective demolition, in order to improve the format, layout and access arrangements;*
- (d) Details of the site particulars prepared, which should include the following information as a minimum:*
  - *Good quality internal and external photographs*
  - *A description of the site / premises*
  - *The current permitted use and all potential employment uses, subject to planning permission*
  - *Dimensions of the building / internal rooms / eaves height / door widths, if relevant/gross internal area / total size of the site, including any land. (Note: Any residential element to the property should be removed or subordinate to the commercial particulars.)*
  - *Extent of site, shown on a site plan*
  - *Site location, including map – the map extract should show the property in relation to the road network*
  - *Services e.g., electricity, gas, water and any other relevant information*
  - *Asking price & tenure – including both leasehold and freehold*
  - *All restrictions, conditions and covenants*

<sup>15</sup> CD 2.3 Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (2012) – Pg 20-21, Paragraphs 50-54

- *Known costs, such as service charges, rateable value and any other known items*
- *Terms and conditions associated with the sale*
- *Parking availability and access to public transport*
- *Contact details for viewing and more information.*

*(e) The site should be continuously advertised by way of a commercial agent's advertisement board (minimum size 0.5 square metres in area) on each site frontage to the main highway throughout the period;*

*(f) The site should be continuously included on the commercial agent's website, the Councils' commercial property database/website and commercial property search sites such as Property Pilot, together with the agents own property papers and/or lists of commercial premises. Circulation should be undertaken to other local commercial agents, by way of mail shots and/or hard copies of sales particulars, and circulated again if any significant details change;*

*(g) The site should be advertised in the regional and local press, including the property press and specialist trade papers, on a frequent basis (minimum 6 adverts) throughout the twelve months timescale. Details of where and how often the site was advertised, with copies of all advertisements placed, including dates, must be produced;*

*(h) A monthly breakdown should be compiled, detailing contact details of interested parties in the property. All expressions of interest / offers received, including rental interest should be shown and progress with negotiations, including any offers rejected and the reasons for this. Where possible the applicant should obtain from interested parties the reasons why they were not able or willing to proceed. It is not sufficient evidence to just quote the number of viewings and generalise on the feedback;*

*(i) Details should be shown of any variations in the marketed use of the site / premises that were introduced in the course of marketing;*

*(j) Details should be provided of any variation in terms and conditions on which the site is being made available.<sup>16</sup>*

### **Central Lancashire Employment Land Study, (BE Group November 2017 – updated April 2019) (CD 6.3/CD 6.4)**

3.23 This objectively assessed need (OAN) assessment for employment land in Central Lancashire was undertaken by BE Group in 2017 to inform the emerging Local Plan which will replace the current adopted Core Strategy. This identified needs of 95.50 ha over 2014-2034, in Chorley Borough. Less realistic supply of 59.45 ha, Chorley had a shortfall of 36.05 ha of employment land to 2034.<sup>17</sup>

3.24 The OAN element of the study was updated in 2019. The assessment considered two methods of assessing OAN:

- Forecasts of jobs change to 2036 which project significant jobs gains in Construction (+7,003 jobs), Transportation and Storage (+1,500 jobs) and the

<sup>16</sup>CD 2.3 Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (2012) – Appendix 1, pg 25-26

<sup>17</sup> CD 6.3 Central Lancashire Employment Land Study – Technical Report (2017) – Pg 228-229, Table 75

office based administrative and support services (+3,268), professional, scientific and technical activities (+2,485) sectors, across Central Lancashire<sup>18</sup> Such forecasts provide a useful picture of projected change in the labour market, which will impact on the types of premises expanding businesses require, even when forecasts are not ultimately chosen as the preferred method of projecting OAN

- Forward projections of past take up – Take up, by year, from 1991 to the present was reviewed to identify the average rate of employment land take up/year achieved in each local authority area. That average rate was then projected forward over the forecast period.

3.25 Forecasts of jobs change were judged the less accurate method of projecting employment land needs for several reasons:

- The fact that employment development will take place at differing jobs densities in different locations. For example, office development in town and city centres will achieve higher densities than out of centre schemes. These differences cannot be accounted for in the high level conversion of jobs change to floorspace and land needs
- Will the decline in jobs lead to the release of land? Experience suggests that even where businesses are contracting, they will continue to hold onto sites in anticipation of future improvement and change. Where jobs are being lost to automation, those new automated processes will still require land on which to operate and can lead to higher productivity and growth
- Land take-up/property needs can be for reasons such as modernisation or geographic relocation, land banking for future needs which are unrelated to the growth or decline of employment numbers within the business
- Expansion may also be within existing premises or on expansion land not accounted for in land allocations<sup>19</sup>

3.26 Given these issues with the Jobs Forecast Model, the forward projection of past take up was the preferred method of identifying OAN. This suggested that Chorley had a

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<sup>18</sup> CD 6.4 Central Lancashire Employment Land Study – Objectively Assessed Needs Update (2019) – Pg 19-20, Paragraph 3.22

<sup>19</sup> CD 6.4 Central Lancashire Employment Land Study – Objectively Assessed Needs Update (2019) – Pg 37, Paragraph 3.44

slightly increased shortfall of 37.18 ha of further need, against the above realistic supply level.<sup>20</sup>

- 3.27 The 2017 Employment Land Study reviewed the local property market in Central Lancashire. That market assessment has since been updated in more recent studies, discussed below. However, it is worth noting that an assessment of employment areas (industrial estates/business parks) completed in this Study, identified the commercial elements of Buckshaw Village as a whole, although not the appeal site specifically, as being 'A Grade' or 'Best Urban' in nature and generally comprising high grade, well occupied space with services nearby.<sup>21</sup> This confirmed the earlier statements of the Adopted Core Strategy that Buckshaw Village is a Best Urban or prime employment area for Central Lancashire.

**Central Lancashire – Employment Land Study Update (BE Group February 2022) (CD 6.5)**

- 3.28 This updated OAN assessment for employment land in Central Lancashire, over 2021-2038 was again prepared to inform the emerging Local Plan.
- 3.29 The assessment considered two methods of assessing OAN:
- Forecasts of jobs change to 2038 which project significant gains in Construction (+2,146) and office-based sector (+5,145) jobs, across Central Lancashire<sup>22</sup>
  - Forward projections of past take up – Take up, by year, from 1991 to the present was reviewed to identify the average rate of employment land take up/year achieved in each local authority area. That average rate was then projected forward over the forecast period.
- 3.30 Again, the forward projection of past take up is the preferred method of identifying OAN, for the same reasons as in the 2019 Update, as noted above. The OAN for Chorley was identified as 76.34 ha to 2038. Less a land supply of 56.28 ha as at October 2021, Chorley has a shortfall of 20.06 ha of employment land over 2021-2038.<sup>23</sup>

<sup>20</sup> CD 6.4 Central Lancashire Employment Land Study – Objectively Assessed Needs Update (2019) – Pg 42, Table 24

<sup>21</sup> CD 6.3 Central Lancashire Employment Land Study – Technical Report (2017) – Pg 234-235, Paragraph 12.7 also Appendix 10, Table A10.1

<sup>22</sup> CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 131, Paragraph 7.29

<sup>23</sup> CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 141, Table 35

3.31 The Employment Land Study Update included a detailed market assessment which identified the following relevant points:

- The Covid-19 Pandemic boosted industrial and warehouse demand as more of the economy has become focused online
- Industrial and warehousing demand remained consistently strong across Central Lancashire over the Covid-19 Pandemic and continued to do so, both from inward investors and local companies looking to grow
- Demand is for space in a range of sizes, but smaller units of sub-500 sqm and particularly 100 sqm were most needed.
- Good quality new light industrial space were attracting rents of £10-15/sqft (£108-161/sqm). Larger units were achieving rates of £6-9/sqft (£65-96/sqm) depending on size and location.
- Strong demand was boosting developer interest in delivering industrial and particularly logistics premises, despite rising construction costs, with land values for industrial land reportedly approaching residential levels, at least in some cases. The pipeline of development, in all three local authority areas, was focused on delivering larger B2/B8 units and there remains a shortage of smaller space across the sub-region.
- Office market interest was for small, flexible and frequently serviced suites that can allow businesses to move staff between full/part time homeworking and office based work, as required. Chorley, with a strong stock of affordable serviced/unserviced small offices, is well placed to benefit from this. Serviced offices could achieve £15-20/sqft (£161-215/sqm) in Preston and Chorley, unserviced a more variable £8-16/sqft (£86-172/sqm) subject to quality, size and location
- Large office space remained well occupied in Central Lancashire, however, demand for new large scale space remains modest and does not yet seem to support large scale investment in new build options
- In both the industrial and office markets, there is a shortage of freehold opportunities against demand
- Stakeholders highlight Buckshaw Village as a focus of demand for smaller industrial uses despite the reducing options for new development here. Out of the 26.98 ha of land originally allocated at Buckshaw Village in the 2015 Chorley Local Plan, only 6.14 ha, or 22.7 percent, was still realistically

available as of 2021, comprising land at Southern Commercial and the Revolution.<sup>24</sup>

### **CD 6.6 Chorley Market Update (BE Group August 2022)**

- 3.32 This report provided an updated picture of the need and demand for employment land and premises in Chorley Borough – industrial, warehouse and office – as of 2022. In terms of industrial and warehouse premises it noted that throughout the Covid-19 Pandemic, and on into 2022, national and regional markets have boomed in the face of growing manufacturing and logistics sectors. Chorley has been no exception with units of 501-1000 sqm most frequently traded, although market activity extends up to units of 5,000 sqm. Average rents were:
- For a 100 sqm unit = £10-15/sqft (£108-161/sqm)
  - For 500 sqm unit = £8/sqft (£86/sqm)
  - For 1,000 sqm unit = £7/sqft (£75/sqm).<sup>25</sup>
- 3.33 Buckshaw Village has been a focus of industrial/warehouse market activity and interest, from existing local occupiers and inward investors.
- 3.34 Overall, when comparing past transaction rates to marketed premises, as of mid-2022, Chorley Borough only had 9-10 months of available industrial/warehouse property supply to meet the Borough's needs. At this time, Chorley Borough's total industrial stock was 98.6 percent occupied by premises number and 96.9 percent by floorspace. High occupancy rates (above 90-95 percent) are an indicator of supply shortfall, and businesses having difficulty in finding premises and make it important to protect existing stock, particularly in high demand locations.<sup>26</sup>
- 3.35 In terms of the office market, post Pandemic, the priority of businesses is to gain flexibility in their space i.e., to increase or decrease their space rapidly in line with staffing requirements. This favoured flexible serviced/unserviced offices with sufficient space to adapt. In this regard, Chorley benefited from its strong stock of affordable serviced/unserviced small offices, in locations with parking/affordable parking including Buckshaw Village. Indeed, when measured by number of deals completed, Chorley saw some of its best market performance in 2020 and 2021. Demand in Chorley was

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<sup>24</sup> CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 148-152, Paragraphs 8.17-8.34

<sup>25</sup> Cd 6.6 Chorley Market Update (2022) – Pg 10, Paragraph 3.22

<sup>26</sup> CD 6.6 Chorley Market Update (2022) – Pg 19-20, Paragraph 5.3-5.4

for suites of 0-100 sqm with Ackhurst Business Park; Railway House and Euxton Lane being the most historically active locations.

- 3.36 Stakeholders reported that there was enough supply to meet demand in the short term, with office accommodation in the Borough 93-94 percent occupied, but expected a growing supply shortage moving forward, particularly in key locations like Buckshaw Village, particularly with no pipeline of new office space evident locally.
- 3.37 For both the industrial and office stock there is a lack of freehold supply which could meet the needs of established businesses looking to invest in their own premises and allow some of the Borough's larger manufacturing companies to grow.<sup>27</sup>

### **Chorley Economic Strategy (2022) (CD 9.8)**

- 3.38 'Big Issue' 5 of the Economic Strategy notes that *"Businesses have told us that they want to remain and grow within Chorley so space to support existing businesses and further investment is now a critical issue... Looking ahead the emphasis will be on working with individual businesses to understand requirements and developing tailored solutions. At a regional level, the council will need to use policy levers, including the Local Plan, and county influence to maximise opportunities for business in Chorley."*<sup>28</sup>
- 3.39 One of the priorities of the Economic Strategy is to provide *"Space for Business"*. Objectives, falling within the priority include to provide:
- *"Fit for purpose accommodation for key sectors that is green and sustainable including office, light industrial and advanced technologies"*
  - *Unlocking land and assets to enable business growth."*<sup>29</sup>
- 3.40 *"Increased business accommodation across the borough with supporting infrastructure"* is identified as a success measure for the Economic Strategy.<sup>30</sup>

### **Summary**

- 3.41 National planning policy highlights the importance of establishing and maintaining a supply of employment land to meet economic needs and allow the growth of different

<sup>27</sup> CD 6.6 Chorley Market Update (2022) – Pg 20, Paragraph 5.6-5.8

<sup>28</sup> CD 9.8 Chorley Economic Strategy (2022) – Pg 5, Point 5 Land and Assets

<sup>29</sup> CD 9.8 Chorley Economic Strategy (2022) – Pg 8, 'Space for Business Priority'

<sup>30</sup> CD 9.8 Chorley Economic Strategy (2022) – Pg 11, Point 9

business sectors. Deliverable employment sites should be protected for E(g)/B-Class uses even in areas of high housing demand<sup>31</sup>.

- 3.42 Core Strategy Policy 10 requires that where an applicant is seeking to develop employment land for alternative uses, particularly housing, that applicant must prove that land is not viable and deliverable for any of the E(g) or B-Class uses. Testing should include a rigorous and active 12 month marketing of the site to businesses and developers to confirm it is not required by the market, again for E(g), B2, or B8 uses.
- 3.43 Across three assessments of OAN, completed since 2017, Chorley Borough is identified as having shortfalls of employment land against needs. In 2017-2019, the shortfall was identified as being some 36-37 ha. In 2021 a shortfall of 20.06 ha was identified for the period 2021-2038. This consistent shortfall in Chorley Borough's employment land supply highlights why it is important for the Borough to protect its existing stock of E(g)/B-Class land.
- 3.44 Recent market assessments identify strong demand for industrial/warehouse uses in Chorley Borough, particularly smaller units of up to 1,000 sqm, from both local businesses and inward investors. In terms of offices, demand is for small flexible suites of 0-100 sqm.
- 3.45 Buckshaw Village is a focus for demand for both industrial/warehousing and office schemes. Analysis in the 2017 Central Lancashire Employment Land Study notes that the area is of high quality, or 'Best Urban', in nature, confirming similar statements made in the earlier adopted Core Strategy.

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<sup>31</sup>CD 1.1 National Planning Policy Framework (2021), Chapter 11, Paragraph 123

## 4.0 REASON FOR REFUSAL ONE

### Introduction

- 4.1 This chapter provides evidence of the ongoing need for the appeal site to meet requirements for E(g), B2, or B8 uses. It undertakes this in support of Reason for Refusal One, namely that: *“The proposed development would result in an unacceptable reduction in the type and quantity of employment land supply contrary to Policy 10 of the Central Lancashire Core Strategy.”* The evidence provided here is linked to the relevant criteria of Core Strategy Policy 10 which the appellant’s scheme has not satisfied.

### Industrial and Warehouse Market Focus

- 4.2 At Para 8.14 of the Main Statement of Common Ground it was agreed that *“A viability report has been prepared and this has demonstrated that office re-use and office redevelopment are not viable on the appeal site.”* It was not, however, agreed that the appeal site would be similarly unviable/undeliverable for redevelopment for industrial and/or warehouse uses. Assuming an average developer density of 3,900 sqm/hectare, the 3.02 ha appeal site could accommodate a maximum of c. 11,800 sqm of floorspace. The evidence presented here thus focuses on the need for and deliverability of the appeal site for E(g)(iii), B2, B8 industrial and storage and development use.

### The Need for the Former DXC Site

- 4.3 In line with Core Strategy Policy 10, the application was refused on criterion *“a) there would not be an unacceptable reduction of the type, quality or quantity of employment land supply”*. In these sections I establish that there is a shortage of industrial/warehouse land and property both in market terms and in terms of OAN, in Chorley Borough and across the region, rebutting some revised assessments of employment land OAN and supply provided by the appellant. Accordingly, the redevelopment of the 3.02 ha appeal site, for housing, would represent an unacceptable loss for a Borough which already has insufficient land to meet its long term needs.

**Regional Market Demand**

- 4.4 A number of national and regional property firms produce data on the take up and the supply of industrial and warehouse space in the North West. They note that 2021 was a record year for industrial and warehouse take up. In its *'Big Shed Briefing (Jan 2022)*, Savills reported nationally that take up was 86 percent above average while supply was at its lowest rate on record, with just 2.9 percent of stock vacant. In the North West take up was 40 percent above 2020 levels with some 691,000 sqm or 7.44 million sqft of stock transacted. Vacancy rates were only 3.09 percent of stock. It is generally accepted that a vacancy rate of around 10 percent is required to provide a reasonable level of supply and choice, and this figure has been tested and accepted at a number of Local Plan examinations where BE Group has provided evidence.
- 4.5 After such a record year it would be unsurprising if 2022 saw weaker levels of market activity, particularly given the macroeconomic uncertainties which have emerged over the course of the year including rising inflation, declining consumer confidence and the impact of the failed autumn mini budget in investment markets. Accordingly, transaction rates have reduced in 2022, but only modestly. In its half yearly review for the first half of 2022 – *Market Update North West Industrial & Logistics (July 2022)* – B8 Real Estate recorded £505 million in large unit B2/B8 transactions, or 39 individual deals in the region. This was 26 percent lower than the first half of 2021's record of £684 million (49 deals) but still a quarter above the average for the first half of each of the last five years which stands at £408 million.
- 4.6 In *'Logic North West Q2 2022' (July 2022)* Knight Frank report that over three quarters of the industrial and warehouse transactions they recorded in the first half of 2022 were for high quality units, referred to as 'Grade A' space. Demand for that high grade space came from a diverse range of businesses including retailers seeking distribution space, but also manufacturing and other logistics firms.
- 4.7 Demand continued to outstrip supply in 2022. In *'Logic North West Q2 2022' (July 2022)* Knight Frank also report that as of summer 2022 only 465,000 sqm or 5 million sqft was available in units of 5,000 sqm or larger, in the North West. This gave a vacancy rate of 3.5 percent i.e., little improved on 2021. Only three Grade A units, which represent the quality level most in demand from occupiers, were on the market at that time.

- 4.8 Another 307,000 sqm or 3.3 million sqft was under development as of July 2022. However, most of that floorspace had been pre-let or pre-sold during construction meaning it was already committed to occupiers and thus would not be available to meet broader needs after completion (Quote – Knight Frank – ‘*Logic North West Q2 2022*’ (July 2022)).
- 4.9 Whilst the occupier market reflects the needs of companies seeking premises for their own use, the investment market reflects the demand from organisations seeking property to hold as an investment. B8 Real Estate in their ‘*Market Update North West Industrial & Logistics*’ (July 2022) report that demand remains strong across a range of investment companies, although with slowing of activity by the end of the first half of 2022, in the face of macro-economic uncertainties. Smaller, or ‘last mile’ logistics assets remain of strong interest to investors. Consequently, the strong levels of demand are reflected in the low investment yields and thus high capital values being achieved at transaction.

#### ***Local/Sub-Regional Employment Land Needs***

- 4.10 As noted in Section 3.0 three separate assessments of OAN, completed since 2017, identified that Chorley Borough, and Central Lancashire as a whole, has a shortage of employment land, over the remainder of the adopted Core Strategy period and on into the next Local Plan period. These shortages are summarised in Table 1. The most up to date, 2022, analysis suggests a shortage of 20.06 ha of employment land, in Chorley Borough over 2021-2038 and a shortage of 34.28 ha across Central Lancashire more generally.
- 4.11 The identified shortfall means that Chorley Borough needs to increase its employment land supply and has no capacity to support losses of E(g), B2, B8 land which, as this Proof of Evidence demonstrates, could still be productively used to meet business needs.

**Table 1 – Employment Land Needs, Hectares**

	Chorley Borough Needs			Central Lancashire Needs		
	Gross Need	Less Realistic Employment Land Supply	Net Need (Less Supply)	Gross Need	Less Realistic Employment Land Supply	Net Need (Less Supply)
2017 OAN <sup>32</sup> (OAN Period 2014-2034)	95.50	59.45	36.05	273.00	190.77	82.23
2019 OAN <sup>33</sup> (OAN Period 2014-2036)	96.93	59.75	37.18	291.87	190.78	101.09
2022 OAN <sup>34</sup> (OAN Period 2021-2038)	76.34	56.28	20.06	225.06	190.78	34.28

Source: BE Group, 2017- 2021

4.12 While it is accepted that the appeal site is not an allocation of employment development land in an adopted local plan, it is still land in an employment use within a strategic employment area. Its loss would still have impacts on the employment land supply and need position, in various ways:

- The development of the 3.02 ha, for housing, would represent a loss of E(g)/B-Class land in the Borough which would need to be allowed for in future calculations of OAN through local plan monitoring, etc.
- It would represent the loss of a site with the potential to meet business needs, meaning businesses would have to take up land elsewhere and commercial developers are deprived of a development opportunity.
- It would reduce the amount of economically productive E(g)/B-Class land in the Borough with impacts on job growth potential and the ability to meet some of the jobs growth projections which inform employment, housing and other targets in Local Plans.

***Employment Land Position, Initial Response to Appellant's Proposed Changes to the Identified Employment Land Supply***

<sup>32</sup>CD6.3 Central Lancashire Employment Land Study – Technical Report (2017) – Pg 228-229, Table 75

<sup>33</sup> CD 6.4 Central Lancashire Employment Land Study – Objectively Assessed Needs Update (2019) – Pg 42-43, Table 24

<sup>34</sup> CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 162, Table 41

*General Position*

- 4.13 It is understood that the appellant will be submitting assessments of employment land OAN and land supply, into evidence, which differ from those set out in the 2022 Central Lancashire Employment Land Study. The CD 6.5 Central Lancashire Employment Land Study (2022) remains the most up to date employment land study for Chorley Borough. It is an identified evidence base document for the emerging Joint Local Plan and was conducted in compliance with NPPF and relevant Planning Practice Guidance including CD 1.2.2 “*Housing and Economic Land Availability Assessments*, CD 1.2.3 *Housing and Economic Needs*” and CD 1.2.1 “*Effective Use of Land*”. It’s findings regarding Objectively Assessed Needs and employment land supply remain the position of Chorley Borough Council and the Council will not agree to alternate measures of need and supply which are inconsistent with agreed evidence base documents.

*Revised Employment Land Supply Analysis*

- 4.14 At the time of submitting this Proof, the appellant had undertaken a separate analysis of the 2021 Chorley Borough employment land supply, as defined in Table 18 of the CD 6.5 Central Lancashire Employment Land Study (2022). Table 18 of the CD 6.5 Central Lancashire Employment Land Study (2022), identified a realistic employment land supply of 56.28 ha.<sup>35</sup> The appellant’s analysis, as set out in Appendix 4 of *the ‘Statement of Common Ground – Employment Land & Viability’* only differs from that of the CD 6.5 Central Lancashire Employment Land Study (2022) on four sites (see Table 2):
- EP1.1: Great Knowley, Chorley – The appellant assumes a full site of 23.7 ha, less 4.90 ha consented for housing, equalling 18.8 ha. However, the Local Plan allocation is for 14.14 ha of which employment uses are only being actively sought, subject to planning, on 6.30 ha and 11.73 ha is not subject to extant housing consents
  - EP1.2: Botany Bay, Chorley – As noted by the appellant, there is now a consent for a development on 8.20 ha, of which 7.80 ha is consented specifically for E(g), B2, B8 uses. While there are also aspirations for office and storage uses in at least part of the Botany Bay Mill this is part of a larger mixed-use scheme to refurbish/remodel a historic listed building, likely to be a complex endeavour. The Mill site, 0.40 ha, cannot be assumed to be realistically available at this time

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<sup>35</sup>CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 92, Table 18

- EP1.9: Woodlands Centre, Southport Road, Chorley – The appellant assumes the full 5.16 ha site is available for redevelopment or refurbishment for employment uses, as opposed to just the allocation in the adopted Local Plan of 0.80 ha. As noted in Table 2, facilities at Woodlands remain in partial use for health and education activities and it has yet to be agreed, in an emerging or adopted development plan, that any additional employment land will be allocated here. Thus, only the original Adopted Local Plan allocation of 0.80 ha remains realistically available, at this time.
- EP1.17: Rear of New Street, Mawdesley – It is accepted that half this site was developed for housing in 2022, giving a remaining supply of 0.30 ha.

4.15 The appellant's amendments give a revised employment supply of 69.91 ha. I would argue that, as of January 2023, the realistic employment land supply is 57.88 ha, accounting for the points noted above (see Table 2). If this supply is subtracted from the 2022 employment land OAN of 76.34 ha, as noted in Table 1 above, this gives Chorley Borough a revised employment land shortfall of 18.46 ha. Again, it is emphasised however, that none of these calculations should be considered as superseding the Council's agreed local plan evidence base document, the 2022 Central Lancashire Employment Land Study.

**Table 2 – Employment Sites Analysis – Chorley<sup>36</sup>**

Site Ref.: Site Name	Stated Site Area, ha	Revised Site Area, ha	Comments in 2022 ELS	Use Classes	Pegasus Suggested Site Area, ha	BE Group Comments	Potential Revised 2023 supply
EP1.1: Great Knowley, Chorley	14.10	11.73	Around half of the wider 23.7 ha EP2 site is now the subject of residential consents. Some 11.73 ha remains undeveloped in the south of the site and, in principle, available for B-Class development. In practice, viability, topography, adjacent housing and landowner intentions are likely to be significant barrier to any employment development in this area	E(g), B2	18.80	<p>Pegasus's approach appears to comprise the following:</p> <ul style="list-style-type: none"> <li>• Policy EP1 of the 2015 Local Plan allocates 23.7 ha in total (14.1 ha for employment uses, 9.6 ha for housing under policy HS1.8)</li> <li>• At the time of writing the main housing consent on the site was for 100 dwellings on 4.9 ha (App. No. 17/00716/OUTMAJ), with other residential consents expected to be superseded by employment proposals</li> <li>• Thus only 4.90 ha of the 23.7 ha site is now actively proposed for housing. <math>23.70 - 4.90 = 18.80</math> ha</li> </ul> <p>This is a misunderstanding of Local Plan policy. The allocation for E(g)/B-Class employment here was 14.10 ha, not 23.70 ha, with other land allocated for housing only. While existing/sought consents may adjust where on the site the employment and housing might be brought forward, it does not automatically adjust the totals of land allocated for housing and employment.</p>	11.73

<sup>36</sup> CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 92, Table 18 and Statement of Common Ground – Employment Land & Viability, Appendix 4

Site Ref.: Site Name	Stated Site Area, ha	Revised Site Area, ha	Comments in 2022 ELS	Use Classes	Pegasus Suggested Site Area, ha	BE Group Comments	Potential Revised 2023 supply
						Thus 14.10 ha is the maximum which could be considered available here for employment uses. At the time of writing consent was being sought for 29,971 sqm of E(g), B2, B8 space on 6.30 ha (App. No.22/01243/FULMAJ), while 11.73 ha remains unaffected by extant residential consents.  Thus, while it is accepted that this may be subject to change over time, the amount of land which is available for employment uses, in the absence of any planning consents for E(g)/B-Class uses on the site remains 11.73 ha.	
EP1.2: Botany Bay, Chorley	5.90	5.90	The existing consent would redevelop the whole area for a primarily A1/A3 retail park. However, in 2020 First Investments indicated that it would not proceed with the proposed retail park " <i>due to the continued decline in the retail sector</i> "; something " <i>further compounded by the coronavirus pandemic</i> ".  In its place, First Investments proposes the 'Botany Bay Business Park', comprising 30,200 sqm of industrial and commercial space, consisting of 12 main blocks. A planning consent is now being sought for this. Details on the land area which will be developed for E/B-Class Uses has yet to be identified, however based on the floorspace	E(g), B2, B8	8.40	It is accepted that there is now a consent for an E(g), B2, B8 industrial park of 36,996 sqm on 8.20 ha (App. No. 21/00439/FULMAJ). This was approved with Section 106 agreement on 25 <sup>th</sup> Jan 2023.  0.40 ha of land comprising Blocks A and B is consented for retail and hot food uses, giving a realistic employment land provision here of 7.80 ha  While there is also an aspiration to re-use at least part of the Botany Bay Mill (0.40 ha) for a mixture of office and storage uses, this would be subject to multiple planning consents for the re-use and refurbishment of this historic listed building.  Employment uses are also part of a	7.80

Site Ref.: Site Name	Stated Site Area, ha	Revised Site Area, ha	Comments in 2022 ELS	Use Classes	Pegasus Suggested Site Area, ha	BE Group Comments	Potential Revised 2023 supply
			proposed it is likely to be larger than 5.90 ha. At the time of writing, Botany Bay Mill was closed for refurbishment/redevelopment, but no external work had commenced.			more complex mixed use proposal with planning consent currently being sought for a helipad and decked car parking (App. Ref. 22/01080/FULMAJ). Given the issues still to be addressed it is not possible to say that the Mill site is realistic supply at the time of writing.	
EP1.3: Land to the North East of M61 junction (Gale Moss) Chorley	6.90	6.90	The land is now the subject of Outline planning consent for 27,871 sqm of B2 and B8 accommodation, car parking, landscape, drainage and other infrastructure. The employment space would comprise six units, indicatively split 75 percent B2, 25 percent B8 and capable of generating some 770 jobs. A timetable for delivering the consent is not set out.	B2, B8	6.90	No change on 2022 ELR Suggested by the Appellant	6.90
EP1.5: Euxton Lane, Chorley	9.85	9.85	Planning consent was granted on 10.42 ha of the total 13.1 ha allocated site for mixed use development comprising a Digital Health Hub. Planning was granted on 2.97 ha of land in the west of the site for the erection of six B1.B2/B8. Proposals are for 9,386 sqm of terraced industrial or hybrid premises comprising 33 units in six blocks. Seddon Developments are the development partner on the site, alongside Ascalon Properties (operating as Euxton Lane Developments). The scheme is referred to as the Strawberry Fields Digital Hub is now complete and operating a high-tech	E(g), B2, B8	9.85	No change on 2022 ELR Suggested by the Appellant	9.85

Site Ref.: Site Name	Stated Site Area, ha	Revised Site Area, ha	Comments in 2022 ELS	Use Classes	Pegasus Suggested Site Area, ha	BE Group Comments	Potential Revised 2023 supply
			business centre offering collaborative office space, hot desks, pods and meeting space, for digital and creative innovators. Other aspects of the wider consents are under construction, particularly in the west of the site.				
EP1.6: Cowling Farm, Chorley	3.50	3.50	No change on 2017 Study	E(g) (iii). B2, B8	3.50	No change on 2022 ELR Suggested by the Appellant	3.50
EP1.7: Land at Ackhurst Business Park, Chorley	0.00	0.00	Now developed for car showroom uses (Sui Generis) for Chorley Nissan.	-	0.00	No change on 2022 ELR Suggested by the Appellant	0.00
EP1.8: Lyons Lane Mill, Townley Street Chorley	0.33	0.33	Planning consent proposed mixed use development consisting of 10 new starter industrial units, 3 refurbished existing units within an enclosed employment site together with 10 residential dwellings. Housing element developed. Three refurbished units have been completed and have a B2 use class. Six new starter industrial units remaining with the 0.33 ha undeveloped.	E(g) (iii). B2	0.33	No change on 2022 ELR Suggested by the Appellant	0.33
EP1.9: Woodlands Centre, Southport Road, Chorley	0.80	0.80	No change on 2017 Study	E(g)(i)	5.16	The Appellant is including the whole of the Woodlands Centre in the calculation, not just the EP1.9 Local Plan allocation. The Woodlands Centre, formally an adult education facility, owned by	0.80

Site Ref.: Site Name	Stated Site Area, ha	Revised Site Area, ha	Comments in 2022 ELS	Use Classes	Pegasus Suggested Site Area, ha	BE Group Comments	Potential Revised 2023 supply
						<p>Lancashire County Council, closed for this use in 2016.</p> <p>Facilities remain in at least partial use however, by the County Council and other public sector agencies for activities such as Covid-19 testing and music tuition.</p> <p>The whole site is included in the Central Lancashire Local Plan Part 1 Preferred Options consultation as site CH/HS1.15. CH/EP1.5.<sup>37</sup> It's in as a preferred option for mixed use (97 dwellings and 1.55ha employment land). Work is ongoing on the local plan and there is still assessment work to be done on the Preferred Option sites e.g., transport assessments. Thus, it cannot be assumed that the Woodlands site will be allocated in the next Local Plan, in its entirety or in part, for employment uses. Thus, only the original Adopted Local Plan allocation of 0.80 ha remains realistically available, at this time</p>	
EP1.10: Stump Lane, Chorley	0.00	0.00	Developed	E(g) (iii)/B2	0.00	No change on 2022 ELR Suggested by the Appellant	0.00

<sup>37</sup> CD 5.1.1 Central Lancashire Local Plan - Regulation 18 Consultation Chorley Site Profiles – Page 26-27, Site Profile 12

Site Ref.: Site Name	Stated Site Area, ha	Revised Site Area, ha	Comments in 2022 ELS	Use Classes	Pegasus Suggested Site Area, ha	BE Group Comments	Potential Revised 2023 supply
EP1.11: The Revolution, Buckshaw Avenue, Buckshaw Village	3.26	3.26	Was leased to Kimberly Clarke but that lease ran out in June 2021. No other change.	B2, B8	3.26	No change on 2022 ELR Suggested by the Appellant	3.26
EP1.12: Group 1, Buckshaw Village	2.30	0.00	Land now proposed for housing, reflecting surrounding uses and ownership by a housebuilder. Consent being sought for 81 dwellings and school pick-up/drop-off car park across both of the sites. Its loss to other uses therefore seems likely.	Assumed housing	0.00	No change on 2022 ELR Suggested by the Appellant	0.00
EP1.13: Southern Commercial, Buckshaw Village	2.88	2.88	<i>Northern Site</i> Northern portion of the site is developed for a KFC drive-thru. A children's nursery is under construction with the loss of 0.28 ha of employment land. <i>Southern Site</i> Proposed for Buckshaw Parkway a scheme of five large, three-storey office buildings of 1,970-3,154 sqm each. Building Two (2,153 sqm) is developed and on the market, to let.	E(g)(i)	2.88	No change on 2022 ELR Suggested by the Appellant	2.88
EP1.14: Fairport, Market Place Adlington	0.60	0.60	No change	B2, B8	0.60	No change on 2022 ELR Suggested by the Appellant	0.60
EP1.15: Land east of Wigan	15.00	8.03	No change on 2017 Study	E(g), B2, B8	8.03	No change on 2022 ELR Suggested by the Appellant	8.03

Site Ref.: Site Name	Stated Site Area, ha	Revised Site Area, ha	Comments in 2022 ELS	Use Classes	Pegasus Suggested Site Area, ha	BE Group Comments	Potential Revised 2023 supply
Lane, Clayton-Le-Woods							
EP1.17: Rear of New Street, Mawdesley	0.60	0.60	No change on 2017 Study	E(g)(iii)/B2/B8	0.30	A housing development of four homes (App. No. 22/00034/REM) has been consented and is under construction on half the site. It is accepted the realistic supply is now 0.30 ha.	0.30
Plan App.1: Land adjacent Weir Mill, Crosse Hall Street, Chorley	0.26	0.00	Consented for the erection of an extension to the existing industrial unit with part first floor ancillary office accommodation and the erection of a new detached industrial unit and associated parking. The extension to the existing industrial unit has been constructed. Other site cleared but no development of the new detached industrial unit in evidence as of October 2021. Some seven years after the consent it appears increasingly unlikely this will be implemented. Development also for a single company only. Not available to wider market.	E(g)(iii)/B2	0.00	No change on 2022 ELR Suggested by the Appellant	0.00
Plan App.2: Twin Lakes Industrial Estate, Brickcroft Lane, Croston	1.90	1.90	Erection of 27 Industrial Units. The permission has been partially implemented with the erection of seven industrial units. Some of the site is used for the open storage of equipment hire by a company Readyplant. No evidence of further progression as of October 2021	E(g)(iii)/B2	1.90	No change on 2022 ELR Suggested by the Appellant	1.90
<b>Totals</b>	<b>68.18</b>	<b>56.28</b>			<b>69.91</b>		<b>57.88</b>

Source: CBC and BE Group, 2021 and Pegasus, 2023

*Revised Historic Take Up Analysis*

4.16 The appellant is also understood to be introducing evidence which proposes revisions on the take up model of OAN which informs the assessment of employment land in the 2022 Employment Land Study. The approach set out in the 2022 Employment Land Study projects forward land needs from the average annual take up rate of the 30 years of available recorded employment land take up in Chorley Borough, 1991-2021. This is set out in Table 3.

4.17 The appellant's revised approach is to only use take up from the period of the Core Strategy, 2010-2011 to 2020-2021, instead of calculating the average rate from all available take up back to 1991.

**Table 3– Employment Land Take-Up 1991-2021<sup>38</sup>**

Completion Period	Chorley	Preston	South Ribble	Comments on Appellant Approach
1991-1992	1.10	27.94	5.00	
1992-1993	0.50			
1993-1994	1.40			
1994-1995	0.80			
1995-1996	2.00	6.73	12.10	
1996-1997	1.60			
1997-1998	3.92			
1998-1999	3.60			
1999-2000	2.30	26.99	0	
2000-2001	0.59			
2001-2002	0.92			
2002-2003	1.06			
2003-2004	6.73			
2004-2005	2.91	6.71	11.24	
2005-2006	12.55	1.09	9.97	
2006-2007	10.91	2.25	7.7	
2007-2008	12.15	1.65	4.25	

<sup>38</sup> CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 124-125, Table 27

Completion Period	Chorley	Preston	South Ribble	Comments on Appellant Approach
2008-2009	2.53	0.38	0	
2009-2010	5.11	2.83	0	
2010-2011	2.63	No Data	14.62	
2011-2012	2.38	No Data	12.60	
2012-2013	6.49	1.11	0.70	
2013-2014	3.92	3.29	0	
2014-2015	1.71	0.48	0	
2015-2016	5.79	0.53	4.63	
2016-2017	0.61	4.77	8.98	
2017-2018	0.65	0.4	3.17	
2018-2019	3.31	2.2	1.62	
2019-2020	3.59	1.02	1.39	
2020-2021	0.21	0	2.14	
<b>Total</b>	<b>103.97</b>	<b>90.37</b>	<b>105.88</b>	
<i>Annual average over 30 years (28 for Preston)</i>	<b>3.47</b>	<b>3.23</b>	<b>3.53</b>	BEG Averages using all available take up data
<i>Reduced annual average, excluding anomalous years</i>	<b>2.62</b>	<b>3.22</b>	<b>2.84</b>	
<b>Pegasus – Averages using 2010-2021 Data Only</b>	<b>31.29 ha total/11 years = 2.84/year</b>	<b>13.80 ha total/9 years with data = 1.53/year</b>	<b>49.85 ha total/11 years = 4.53/year</b>	<b>Appellant Averages using only data from the Core Strategy Period 2010-2021</b>

Source: CBC, PCC, SRBC and BE Group, 2021 and Pegasus 2023

#### 4.18 Resulting projections of OAN can be summarised as:

- 2022 ELR Approach Chorley – 76.34 ha (need, 17 years forecast plus a 5-year buffer at 3.47 ha/year) less 56.28 ha (ELR realistic supply, local only) = **20.06 ha (further need)**<sup>39</sup>
- Appellant’s approach Chorley – 62.48 ha (need, 17 years forecast plus a 5-year buffer at 2.84 ha/year) less 56.28 ha (ELR realistic supply, local only) = **6.20 ha (further need)**
- Appellant’s approach including their assessment of realistically available supply – 62.48 ha (need, 17 years forecast plus a 5-year buffer at 2.84 ha/year) less 69.91 ha (Appellant identified supply, as noted in Table 2) = **7.43 ha (supply surplus)**

<sup>39</sup> CD 6.5 Central Lancashire Employment Land Study Update (2022) – Pg 162, Table 41

- 4.19 I would disagree with the appellant's approach of only using take up data from 2010-2011 onwards to forecast needs for the following reasons:
- Only using a third of the available data does not make full use of the market signals available here and would not follow Paragraph: 027 of the Housing and Economic Needs PPG which states that "*Strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust.*"
  - One advantage of a 30 year take up range is that it allows consideration of a broader number of cycles of economic growth and recession giving greater weight to the resulting projections and confidence those projections will account for future economic cycles
  - Only using a short take up analysis period amplifies the impact of any anomalous years. For example, the year 2020-2021 saw unusually low take up levels in Chorley and Preston, likely resulting from greatly reduced market activity during the years of the Covid-19 Pandemic, a unique situation. Under an 11 year take up analysis, this unusual year gains more significance than it would in a thirty year analysis
  - A reduced 11 year take up period also amplifies the impact of the last national recession, which ran to 2013 and again, may not prove typical of future periods of negative economic change
  - There is no clear precedent for only using take up from a historic local plan period, to project needs forward for a replacement local plan period, when earlier data is available. It is not clear what advantages this approach would have against the issues raised above.

### **Premises Shortages**

- 4.20 At the time of the 'Chorley Market Update (BE Group 2022)' Chorley Borough's total industrial stock was 98.6 percent occupied by premises number and 96.9 percent by floorspace. High occupancy rates (above 90-95 percent) are an indicator of supply shortfall, and businesses having difficulty in finding premises and make it important to protect existing stock, particularly in high demand locations.<sup>40</sup>
- 4.21 The assessment of occupancy rates compared 2020 Valuation Office data on total Borough stock ("Non-domestic rating: stock of properties including business

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<sup>40</sup> CD 6.6 Chorley Market Update (2022) – Pg 19-20, Paragraph 5.3-5.4

floorspace, 2020<sup>41</sup>) and floorspace with an assessment of premises vacant and on the market derived from the EGi Radius database. This exercise can be updated. Table 2 identifies the stock and floorspace on the market as of January 2023.

**Table 2 – Vacant Stock in Chorley Borough**

Type	Vacant Units	Vacant Floorspace, sqm
Industrial	18	21,251
Office	53	34,565
Total	71	55,816

Source: EGi Radius, 2023<sup>42</sup>

- 4.22 The “Non-domestic rating: stock of properties including business floorspace, 2022”<sup>43</sup> indicates that, as of March 2022, there was 601,000 sqm of industrial floorspace in 1,120 properties. Comparing the two sets of data suggests an updated occupancy rate of 98.4 percent by premises or 96.5 percent by floorspace, i.e., little changed on 2020 figures by premises numbers or floorspace.

### **The Suitability of the Former DXC Site for Employment Use**

- 4.23 *Core Strategy Policy 10*: The proposal is also contrary to criterion “(c) *the relative suitability of the site for employment and for the alternative use*” i.e., the site remains better suited to E(g)/B-Class employment uses than the alternative use proposed. In these sections I demonstrate that the Buckshaw Village Strategic Site, within which the appeal site is located, is a focus for industrial, warehouse demand in Central Lancashire and has seen multiple successful industrial developments in recent years. These are developments which could be replicated on the Former DXC Site. Thus, the site remains well suited for employment development.

### **Location**

- 4.24 As was noted in Section 3.0, stakeholders consulted for the CD 6.3/CD 6.4 ‘*Central Lancashire Employment Land Studies (2017 and 2021 Update)*’ as well as for the CD

<sup>41</sup> <https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2020>

<sup>42</sup> <https://www.egi.co.uk/radius-dx/data/>

<sup>43</sup> <https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2022>

6.6 '*Chorley Market Update (2022)*' consistently identified Buckshaw Village a focus for market demand in Central Lancashire for industrial, warehouse and out of centre office uses. Factors which make Buckshaw Village an area of high demand include its strong links to the national motorway network, large stock of modern industrial, warehouse and office premises, and its critical mass of established companies on the Strategic Site.

- 4.25 In terms of Motorway access, if measured from the appeal site<sup>44</sup>, Buckshaw Village is 2.7 km east of Junction 8, of the M61 Preston-Manchester route. By the same measure, Buckshaw Village is 4.0 km south east of Junction 28, of the M6 cross country route. From Junction 28, it is another 2.5 km north to Junction 29 and the M6 junction with the M65 route across Pennine Lancashire. Additionally, the A49 along the western boundary of Buckshaw Village and the A6 runs along the eastern boundary, both are major cross country routes linking towns and cities in the region.
- 4.26 The manufacturing and the logistics market in the North West, as in other areas, is strongly driven by location with access to market remaining one of the main factors when considering a decision for the location of new premises.
- 4.27 Buckshaw Village provides a sizable stock of modern premises. It emerged from the redevelopment of RoF Euxton with clearance of all remaining historic industrial/warehouse premises commencing in 1998-1999, although some historic offices were retained on Euxton Lane. New build industrial and warehouse development commenced in 2006 with the development of the Revolution Park scheme, Buckshaw Avenue.<sup>45</sup> This means that all industrial and warehouse stock, which ranges from sub-50 sqm light industrial units to the 39,000 sqm Waitrose Distribution Centre, are no more that 16-17 years old. Securing modern premises, which have been developed on Buckshaw Village, which can meet contemporary requirements for features like eaves heights and power capacity, is another priority for businesses seeking new premises.
- 4.28 In terms of the critical mass of businesses, Buckshaw Village is home to a diverse range of businesses including regional and national companies such as Waitrose, Multipart Solutions, Badger Office Supplies, Merlin Cycles, Kimberley Clark,

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<sup>44</sup> Distances measured from the same centrepoint as distances from services, agreed in Section 4, Pg 9-10 of the Main Statement of Common Ground

<sup>45</sup> [https://en.wikipedia.org/wiki/Buckshaw\\_Village](https://en.wikipedia.org/wiki/Buckshaw_Village)

Parcelforce and Conair Logistics (Great Bear). As was discussed in the Chorley Market Update (2022) a key occupier is GA Pet Foods which employs 850 directly and 136 indirectly in Chorley Borough, in three facilities, two of which are on Revolution Park, Buckshaw Village. The company is seeking growth including extensions to its Buckshaw Village operations. Here GA has requirements for 30,000 sqm of warehouse space and 10,000 sqm of office space. In the absence of any large remaining employment sites on Revolution Park, proposals are for the redevelopment of the 8 ha Euxton Park Golf Range, Euxton Lane, which is owned by GA.<sup>46</sup>

- 4.29 The presence of such a diverse range of companies on Buckshaw Village will be a further attractor to businesses.

***Examples of Successful Industrial Development in the Buckshaw Market Area***

- 4.30 I have identified a number of other locations in Buckshaw Village, and in a common market area along Euxton Lane and along the A49, north to the M6/M65 Junction, where industrial premises have been successfully delivered in the last decade. These are outlined in Table 3 and are limited to developments on sites of less than 3 ha and/or for less than 12,000 sqm of space which would be of a comparable scale to what could be delivered on the appeal site. Transactions data which informed the assessment of achieved rents and values is provided at Appendix 2.
- 4.31 Table 3 shows that six schemes of primarily light industrial units have been successfully developed in, or in close proximity to, Buckshaw Village for units of 46-810 sqm each. Agent comments and research suggests that all were popular with local businesses, securing occupiers quickly after, or prior to completion from the local business community. All are presently well occupied and two are fully occupied. These show that at least light industrial development is achievable in the area, on plots of comparable size to the appeal site.

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<sup>46</sup> CD 6.6 Chorley Market Update (2022) – Pg 10, Text Box

**Table 3 – Examples of Industrial Development in the Buckshaw Market Area<sup>47</sup>**

Scheme	Location	Developer(s)	Scheme Details	Achieved Rents/Values, £/sqft (£/sqm)	Comments
Momentum	Roundhouse Court, Barnes Wallis Way, Buckshaw Village, Chorley, PR7 7JN	Roundhouse Properties	27 light industrial units and eight offices on 1 ha 3,600 sqm total Units 59-198 sqm in size Fully occupied at time of writing	Best rent = £8.59/sqft (£92/sqm) achieved for a 92 sqm unit in 2019 Best Freehold value = £141.73/sqft (£1,526/sqm) achieved for a 59 sqm unit in 2018 Best Long leasehold value = £105.51/sqft (£1,136/sqm) achieved for a 70 sqm unit in 2015	Commenced in 2013 Accommodates a mixture of trade and engineering firms Roundhouse and Seddon have successfully developed a number of mostly light industrial schemes in the area, these represented some of the first speculative developments to be delivered in Lancashire post the 2008-2013 National Recession.
Matrix Park	Matrix Way, Matrix Point, Buckshaw Village, Chorley, PR7 7NA	SD Matrix (Seddon Developments)	Five 'Midi' industrial employment units (335 sqm each) in the east and 14 terraced 'Mini' starter units of 72 sqm each in the west on 0.46 ha 2,683 sqm total 79 percent occupied at time of writing	All the units were originally sold on a freehold/long leasehold basis in 2015/16  Best rent = £11.00/sqft (£118/sqm) achieved for a 76 sqm unit in 2020 Best Freehold value = £115.76/sqft (£1,447/sqm) achieved for a 76 sqm unit in 2019 Best Long leasehold value = £134.46/sqft (£1,246/sqm) achieved for a 444 sqm unit in 2016	Commenced in 2015 Accommodates a mixture of trade and engineering firms Roundhouse and Seddon have successfully developed a number of mostly light industrial schemes in the area, these represented some of the first speculative developments to be delivered in Lancashire post the 2008-2013 National Recession.
Eaton Point	Matrix Park, Eaton Avenue, Buckshaw Village, Chorley, PR7 7NA	Chancerygate	13 industrial units on 1.86 ha 311- 810 sqm each	Units sold on a freehold basis Best Freehold value = £274.03/sqft (£2,950/sqm) achieved for a 314 sqm unit in 2019	Commenced in 2018 Fully occupied at time of writing, mostly with local engineering firms, plus some trade occupiers Agents Robert Pinkus and Co commented that "11 out of 13 units had sold within 9 months of

<sup>47</sup> Mixed data sources including internet research, the EGi Radius and Land Insight databases as well as contacts with scheme agents.

			Also, one large unit of 4,410 sqm (One Eaton Point) 9,450 sqm total 92 percent occupied at time of writing		<i>completion, mainly on a freehold basis and achieving record freehold values for Lancashire.</i>
Strawberry Meadows	Berry Way, off Euxton Lane, Chorley	Seddon Developments, alongside Ascalon Properties (operating as Euxton Lane Developments), supported by Chorley Borough Council	33 light industrial/storage units Part of a larger 8.8 ha site with other E(g) B-Class uses 6,294 sqm in total 46-476 sqm each 79 percent occupied at time of writing.	26 lettings to date Best rent = £18.90/sqft (£203/sqm) achieved for a 186 sqm unit in 2022	Commenced in 2020 Premises let on minimum 3 year terms, with the maximum achieved lease term being 15 years Rent free periods given on two occasions due to the fit out not being fully complete. The remainder were not given any incentives. Part of a mixed use site including 120 homes and the 5,195 sqm Strawberry Fields Digital Hub, a high-tech business centre offering collaborative office space, hot desks, pods and meeting space, for digital and technology businesses.
Momentum Business Park	Momentum Place, Bamber Bridge, Preston, Lancashire PR5 6EF	Roundhouse Properties	43 light industrial/storage units, developed in several phases, on 0.75 ha Units are 68 sqm each 2,924 sqm total Fully occupied at time of writing	Units let on 999 year, long leases. Best Long leasehold value = £139.19/sqft (£1,498/sqm) achieved for a 59 sqm unit in 2016	Commenced in 2015 May units were let off plan Dominated by trade uses Roundhouse and Seddon have successfully developed a number of mostly light industrial schemes in the area, these represented some of the first speculative developments to be delivered in Lancashire post the 2008-2013 National Recession.
Amethyst Court	South Rings, Preston PR5 6BZ	Commercial Development Projects (Marshall Holdings)	Solus new build B8 warehouse of 3,985 sqm	Leased to Argos in 2021 for £7.75/sqft (£83/sqm) Sold as an investment to London Metric Distribution in 2022 for £8.35 million or £195/sqft (£2,094/sqm) at 3.73 percent yield on a rental income of £332,475/year.	Completed in 2021
Dollywaggon Way	South Rings, Bamber Bridge, PR5 6EW	Roundhouse Properties	49 light industrial units in seven blocks on 0.99 ha 60-237 sqm each	Units let on 999 year, long leases. Best Long leasehold value = £245.77/sqft (£2,645/sqm) achieved for a 79 sqm unit in 2019	Commenced in 2018 Most units in trade use

			One vacant unit at time of writing. 98 percent occupied		
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Source: BE Group, 2023

- 4.32 In five of the six schemes, the majority of the units were sold on a freehold or long leasehold basis, achieving best freehold values of £274.03/sqft (£2,950/sqm) and best long leasehold values of £245.77/sqft (£2,645/sqm), for units of 314 sqm and 79 sqm respectively.
- 4.33 The main new build leasehold scheme in the area is Strawberry Meadows, located just under 1 km east of the appeal site, off Euxton Lane. It has successfully let 26 of 33 units in some two years of marketing. The best rent achieved rent on the scheme, to date, was £18.90/sqft (£203/sqm) for a unit of 186 sqm.
- 4.34 Additionally, at South Rings, Bamber Bridge a solus B8 warehouse of 3,985 sqm (Amethyst Court) was developed in 2021 and let to Argos for 7.75/sqft (£83/sqm). It was subsequently sold as an investment for £195/sqft (£2,094/sqm) at 3.73 percent yield – date 1<sup>st</sup> December 2022.

#### **The Developability of the DXC Site**

- 4.35 *Link to Core Strategy Policy 10:* Other criteria of Policy 10, which the proposal has not satisfied are:
- “(g) convincing evidence of lack of demand through a rigorous and active 12 month marketing period for employment re-use and employment redevelopment*
- (h) an assessment of the viability of employment development including employment re-use and employment redevelopment.”*
- 4.36 Grounds for refusal here include that:
1. The 12 month marketing campaign required in criteria g) has not been carried out, something I have independently confirmed through internet searches and engagement with local property agents who would be aware if the site had been put on the market. The Central Lancashire Controlling Re-Use of Employment Premises Supplementary Planning Document (SPD) (October 2012) sets out criteria that the Council expects as a minimum to be undertaken as part of a vigorous marketing campaign. In commercial terms, these are common to many developments and development sites, and include appointment of specialist and/or local agents; erection of a marketing board; illustrative site plans to show capacity through development options; online marketing through recognised national platforms; direct marketing to businesses and/or developers. The site owners have not carried out any such marketing campaign.

2. Accordingly, any assessment of viability provided by the appellant is of limited utility as it is not backed by a long term marketing campaign to gather real world data on what rents, values, etc. parties showing interest in the site might be willing to pay
3. Additionally testing of viability and deliverability, provided by the appellant, did not consider the full range of E(g)/B-Class uses which could be brought forward here, specifically redevelopment for industrial and/or warehouse uses.

4.37 Here I consider some of the market signals which provide evidence of the current strength of the industrial market across different size ranges and that will support the view that industrial/warehouse uses would be deliverable on the appeal site

### ***Rents/Values***

4.38 Table 3 provides evidence of occupational transactions in the area. Rental levels achieved show prime rents for units of 200-300sqm as £18.90/sqft (£203/sqm) and larger units achieving £7.75/sqft (£83/sqm). These levels have been achieved in the wider area. See Appendix 2 for transaction details.

4.39 The market for smaller industrial space, primarily up to 300sqm has seen significant sales of premises. Prime freehold values of £274.03/sqft (£2,950/sqm) and long leasehold values of £245.77/sqft (£2,645/sqm) have been achieved for units in this size range.

### ***Yields***

4.40 Prime yields remain strong in the North West for. Industrial and distribution investment property. At Appendix 4, past transactions data is shown illustrating prime North West yields achieved for investment deals since 2019 in, and around, the M6, M61, M65, M55 corridor areas. These show yields of 3-5 percent being achieved for a diverse range of industrial and warehouse premises. Whilst there has been a slowdown of investment transactions in the past 12 months, reflecting recent economic and political uncertainty, yields remain at these levels.

4.41 The most recent and relevant transaction is the new build (3,985 sqm) Amethyst Court building at South Rings, Bamber Bridge which achieved a yield of 3.73 percent in 2022.

### ***Build Costs***

- 4.42 It is recognised that build costs have risen considerably in last the 12 months due to inflationary pressures. However, this is not permanent and such costs can be expected to reduce once inflation begins to decline from its 2022/23 peaks.

### **Summary**

- 4.43 While it was accepted in the Main Statement of Common Ground that the appeal site was not viable for office uses, it is not accepted however, that industrial and warehouse uses are similarly not deliverable here. Accordingly, evidence presented here focuses on market interest and deliverability for E(g), B2, B8 industrial and warehouse uses.
- 4.44 In terms of *Core Strategy Policy 10: "a) there would not be an unacceptable reduction of the type, quality or quantity of employment land supply"* after a record year of take up in the national and regional industrial and warehouse markets, in 2021 vacancy rates for premises in the North West reduced to around 3 percent. This was well below the 10 percent vacancy rates required to give businesses choice in premises. Despite modest reductions in market activity in 2022, vacancy rates are still only around 3.5 percent with particular shortages of 'Grade A' accommodation against demand.
- 4.45 It is also noted that across three separate analyses of OAN, that Chorley Borough, and Central Lancashire more generally, has shortages of employment land across the Core Strategy period and beyond. This means there is no capacity in the Borough to absorb further losses of employment land.
- 4.46 It is understood that the appellant will be submitting assessments of employment land OAN and land supply, into evidence, which differ from those set out in the 2022 Central Lancashire Employment Land Study. The CD 6.5 Central Lancashire Employment Land Study (2022) remains the most up to date employment land study for Chorley Borough. It is an identified evidence base document for the emerging Joint Local Plan and was conducted in compliance with NPPF and relevant Planning Practice Guidance. It's findings regarding Objectively Assessed Needs and employment land supply remain the position of Chorley Borough Council and the Council will not agree to alternate measures of need and supply which are inconsistent with agreed evidence base documents.
- 4.47 Updated occupancy rates for 2022/23 are identified of 98.4 percent by premises or 96.5 percent by floorspace. High occupancy rates (above 90-95 percent) are an

indicator of supply shortfall, and of businesses having difficulty in finding premises and make it important to protect existing stock, particularly in high demand locations.

- 4.48 In terms of *Core Strategy Policy 10: “(c) the relative suitability of the site for employment and for the alternative use”*, it is highlighted that Buckshaw Village is well located on the strategic road network, offers a large stock modern accommodation and is already home to a critical mass of high value businesses. These are all factors which make the area attractive for businesses to locate to.
- 4.49 Six schemes of primarily light industrial units have been successfully developed in, or in close proximity to, Buckshaw Village for units of 46-810 sqm each in the last decade. All six were popular with local businesses, securing occupiers quickly after, or prior to completion from the local business community. All are presently well occupied and two are fully occupied. These show that industrial development is achievable in the area, on plots of comparable size to the appellant’s site.
- 4.50 Other criteria of Policy 10, which the proposal does not satisfy are:  
*“(g) convincing evidence of lack of demand through a rigorous and active 12 month marketing period for employment re-use and employment redevelopment*  
*(h) an assessment of the viability of employment development including employment re-use and employment redevelopment.”*
- 4.51 Here it is highlighted that the 12 month marketing campaign required in criteria g) has not been carried out. Accordingly, any assessment of viability provided by the appellant is of limited utility as it is not backed by a long term marketing campaign to gather real world data on what rents, values, etc. parties showing interest in the site might be willing to pay. Additionally testing of viability and deliverability, provided by the appellant, did not consider the full range of E(g)/B-Class uses which could be brought forward here, notably industrial and/or warehouse uses.
- 4.52 Evidence on the deliverability of industrial and warehouse uses is provided including:
- Rents – Rental levels achieved show prime rents for units of 200-300sqm as £18.90/sqft (£203/sqm) and larger units achieving £7.75/sqft (£83/sqm). These levels have been achieved in the wider area.
  - Values –The market for smaller industrial space, primarily up to 300sqm has seen significant sales of premises. Prime freehold values of £274.03/sqft

(£2,950/sqm) and long leasehold values of £245.77/sqft (£2,645/sqm) have been achieved for units in this size range.

- Yields –Yields of 3-5 percent have been achieved for a diverse range of industrial and warehouse premises.
- Build Costs – It is recognised that build costs have risen considerably in last the 12 months due to inflationary pressures. However, this is not permanent and such costs can be expected to reduce once inflation begins to decline from its 2022/23 peaks.

## 5.0 CONCLUSION

5.1 The appeal proposal fails multiple criteria of Core Strategy Policy 10, specifically:

*(a) there would not be an unacceptable reduction of the type, quality or quantity of employment land supply* – While it was accepted in the Main Statement of Common Ground that the appeal site was not viable for office uses, it is not accepted however, that industrial and warehouse uses are similarly not deliverable here. Regionally and locally, the stock of industrial and warehouse premises is more than 96 percent occupied. This was well below the 10 percent vacancy rates required to give businesses choice in premises. Three multiple assessments of OAN also identify shortages of employment land in Chorley Borough, meaning the Borough cannot absorb further losses of land

*(c) the relative suitability of the site for employment and for the alternative use* – It is highlighted that Buckshaw Village is well located on the strategic road network, offers a large stock modern accommodation and is already home to a critical mass of high value businesses. These are all factors which make the area attractive for businesses to locate to. Six schemes of primarily light industrial units have been successfully developed in, or in close proximity to, Buckshaw Village for units of 46-810 sqm each in the last decade, providing evidence that small schemes can be delivered here

*(g) convincing evidence of lack of demand through a rigorous and active 12 month marketing period for employment re-use and employment redevelopment*

*(h) an assessment of the viability of employment development including employment re-use and employment redevelopment.”* - The 12 month marketing campaign required in criteria g) has not been carried out. Accordingly, any assessment of viability provided by the appellant is of limited utility as it is not backed by a long term marketing campaign to gather real world data on what rents, values, etc. parties showing interest in the site might be willing to pay. Additionally testing of viability and deliverability, provided by the appellant, did not consider the full range of E(g)/B-Class uses which could be brought forward here, notably industrial and/or warehouse uses, for which there is clear evidence of deliverability.

5.2 Overall, I highlight that the appeal site could not just accommodate E(g) office uses, as it does at present, but the full range of E(g)/B-Class uses including industrial and warehouse options. In this Proof I have established that there is a strong demand for industrial and warehouse uses on, and around, the appeal site, with interest ranging from small workshops of 46 sqm up to larger B2/B8 facilities of 11,800 sqm, i.e., the

maximum capacity of the site. This demand was not considered by the appellant prior to the refusal of the application.

- 5.3 For the reasons set out above, I respectfully support the view that this appeal should be dismissed.

## **Appendices**

Appendix 1 – Bibliography

Appendix 2 – List of Transactions which inform Table 3.

Appendix 3 – List of Transactions which inform Paragraphs 4.40-4.41

## Appendix 1

### Bibliography

- CD 1.1 National Planning Policy Framework
- CD 1.2.1 Planning Practice Guidance – Effective Use of Land
- CD 1.2.2 Planning Practice Guidance – Housing and Economic Land Availability Assessment
- CD 1.2.3 Planning Practice Guidance – Housing and Economic Needs Assessment
- CD 2.1 Central Lancashire Core Strategy – July 2012 (2012)
- CD 2.2 Chorley Local Plan (2012-2026 (2015)
- CD 5.1.1 Central Lancashire Local Plan - Regulation 18 Consultation Chorley Site Profiles
- CD 6.1 Chorley, Preston & South Ribble Employment Land Review to 2021 – April 2009  
(Drivers Jonas)
- CD 6.3 Central Lancashire Employment Land Study Technical Report – November 2017 (BE Group)
- CD 6.4 Central Lancashire Employment Land Study Update Report – April 2019 (BE Group)
- CD 6.5 Central Lancashire Employment Land Study Final Report – February 2022 (BE Group)
- CD 6.6 Chorley Market Update Final Report – August 2022 (BE Group)
- CD 9.8 Chorley Economic Strategy 2022

## Appendix 2

List of Transactions which inform Table 3.

*Multiple Sources including EGi Radius database, LandInsight database, contacts with agents and review of agents websites.*

Scheme Name	Scheme Address	Individual Units	Sqft	Sqm	Transaction Date	Tenure	Rent per annum / Sale Price	£/sqm	£/sqft	Agents	Comments
Roundhouse Court/ Momentum Business Centre	Barnes Wallis Way, Buckshaw Village, Chorley, and PR7 7JN	Unit 5	1100	102	2018	Leasehold	8,500	£83.18	£7.73	Pinkus	
		Unit 6	990	92	2019	Leasehold	8,500	£92.42	£8.59	Pinkus	
		Unit 20	1109	103	2018	Freehold	90,000	£873.57	£81.15		
		Unit 24	1066	99	2014	Long Leasehold	£86,500	£873.74	£81.17		Offices and Workshops
		Unit 28	635	59	2018	Freehold	90,000	£1,525.64	£141.73		
		Unit 35	753	70	2015	Leasehold	79,500	£1,135.71	£105.51		
		6 Units	6264	582	2013	Freehold	£300,000	£515.53	£47.89		
Strawberry Meadows	Strawberry Meadows Business Park , Berry Way, Chorley, PR7 1PS	3A	3500	325	2022	Leasehold	£33,750.00	£103.80	£9.64	Pinkus	All leases done on a 3 year minimum lease terms. The maximum achieved was 15 years. Rent free periods given on two occasions due to the fit out not being fully complete. The remainder were not given any incentives
		6A	3500	325	2022	Leasehold	£34,800.00	£107.03	£9.94		
		B8	2750	255	2022	Leasehold	£26,813.00	£104.95	£9.75		
		B9	2750	255	2022	Leasehold	£26,813.00	£104.95	£9.75		
		B10	2750	255	2022	Leasehold	£26,813.00	£104.95	£9.75		
		B11	2750	255	2022	Leasehold	£27,000.00	£105.69	£9.82		
		C14	5000	465	2022	Leasehold	£26,814.00	£57.73	£5.36		
		C15	4000	372	2022	Leasehold	£47,250.00	£127.15	£11.81		
		C16	4000	372	2022	Leasehold	£37,800	£101.72	£9.45		
		D17	2000	186	2022	Leasehold	£37,800	£203.44	£18.90		
		D18	2000	186	2022	Leasehold	£29,000	£156.08	£14.50		

		D19	2000	186	2022	Leasehold	£29,000	£156.08	£14.50	
		E20	500	46	2022	Leasehold	£6,001	£129.19	£12.00	
		E21	500	46	2022	Leasehold	£6,000	£129.17	£12.00	
		E22	500	46	2022	Leasehold	£6,001	£129.19	£12.00	
		E23	500	46	2022	Leasehold	£5,600	£120.56	£11.20	
		E24	500	46	2022	Leasehold	£6,000	£129.17	£12.00	
		E25	500	46	2022	Leasehold	£5,800	£124.87	£11.60	
		E26	500	46	2022	Leasehold	£5,500	£118.41	£11.00	
		F27	750	70	2022	Leasehold	£7,200	£103.34	£9.60	
		F28	750	70	2022	Leasehold	£8,250	£118.41	£11.00	
		F29	750	70	2022	Leasehold	£8,250	£118.41	£11.00	
		F30	750	70	2022	Leasehold	£8,300	£119.12	£11.07	
		F31	750	70	2022	Leasehold	£8,300	£119.12	£11.07	
		F32	750	70	2022	Leasehold	£8,250	£118.41	£11.00	
		F33	750	70	2022	Leasehold	£8,250	£118.41	£11.00	
Momentum Business Park	Momentum Place, Bamber Bridge, Preston, Lancashire PR5 6EF	1	720	67	2016	Long Leasehold	£84,500	£1,264.04	£117.43	
		2	720	67	2016	Long Leasehold	£84,500	£1,264.04	£117.43	
		3	720	67	2016	Long Leasehold	£84,500	£1,264.04	£117.43	
		4	720	67	2016	Long Leasehold	£84,500	£1,264.04	£117.43	
		5	666	62	2016	Long Leasehold	£73,500	£1,188.16	£110.38	
		6	666	62	2016	Long Leasehold	£88,200	£1,425.79	£132.46	

		7	752	70	2016	Long Leasehold	£88,310	£1,264.42	£117.46		
		9	634	59	2016	Long Leasehold	£88,200	£1,498.29	£139.19		
		10	634	59	2016	Long Leasehold	£86,500	£1,469.41	£136.51		
		12	634	59	2016	Long Leasehold	£75,000	£1,274.06	£118.36		
		16	1955	182	2016	Long Leasehold	£229,500	£1,263.84	£117.41		
		17	634	59	2016	Long Leasehold	£75,000	£1,274.06	£118.36		
		18	1246	116	2016	Long Leasehold	£73,500	£635.05	£59.00		
		19	1246	116	2016	Long Leasehold	£87,500	£756.01	£70.23		
		20	1246	116	2016	Long Leasehold	£142,500	£1,231.22	£114.38		
		21	1246	116	2016	Long Leasehold	£136,750	£1,181.54	£109.77		
		22	1246	116	2016	Long Leasehold	£136,750	£1,181.54	£109.77		
		23	1246	116	2016	Long Leasehold	£142,500	£1,231.22	£114.38		
		24	1246	116	2016	Long Leasehold	£152,500	£1,317.63	£122.41		
		27	720	67	2016	Long Leasehold	£90,000	£1,346.32	£125.07		

		30	730	68	2016	Long Leasehold	£76,500	£1,127.54	£104.75	
		31	730	68	2016	Long Leasehold	£79,500	£1,171.76	£108.86	
		33	730	68	2016	Long Leasehold	£87,560	£1,290.56	£119.89	999 year lease
		34	730	68	2016	Long Leasehold	£76,500	£1,127.54	£104.75	999 year lease
		35	730	68	2016	Long Leasehold	£90,000	£1,326.52	£123.23	
Matrix Park	Matrix Way, Matrix Point, Buckshaw Village, Chorley, PR7 7NA and Matrix Park, Western Avenue, PR7 7NB	Unit 1	775	72	2016	Long Leasehold	£80,000	£1,111.11	£103.22	
		Unit 2	1181	110	2020	Leasehold	£9,000	£82.03	£7.62	
		Unit 2	818	76	2016	Long Leasehold	£80,000	£1,052.63	£97.79	
		Unit 3	818	76	2016	Long Leasehold	£80,000	£1,052.63	£97.79	
		Unit 4	818	76	2016	Long Leasehold	£80,000	£1,052.63	£97.79	
		Unit 4	818	76	2020	Leasehold	£9,000	£118.42	£11.00	
		Unit 5	818	76	2016	Long Leasehold	£81,375	£1,070.72	£99.47	
		Unit 6	818	76	2016	Long Leasehold	£81,375	£1,070.72	£99.47	
		Unit 7	829	77	2016	Long Leasehold	£81,375	£1,056.82	£98.18	
		Unit 8	829	77	2016	Long Leasehold	£80,000	£1,038.96	£96.52	

		Unit 9	829	77	2016	Long Leasehold	£81,375	£1,056.82	£98.18	
		Unit 10	829	77	2016	Long Leasehold	£93,375	£1,212.66	£112.66	
		Unit 11	818	76	2016	Long Leasehold	£81,375	£1,070.72	£99.47	
		Unit 12	818	76	2016	Long Leasehold	£81,375	£1,070.72	£99.47	
		Unit 13/14	818	76	2019	Long Leasehold	£110,000	£1,447.37	£134.46	
		Unit 15	818	76	2022	Long Leasehold	£80,000	£1,052.63	£97.79	
		Unit 16	3671	341	2016	Long Leasehold	£315,000	£923.75	£85.82	
		Unit 18	3703	344	2017	Long Leasehold	£280,000	£813.95	£75.62	
		Unit 19	5544	515	2016	Long Leasehold	£470,000	£912.62	£84.78	
		Unit 20	10904	1013	2016	Long Leasehold	£874,800	£863.57	£80.23	
		Unit C1	7534	700	2008	Freehold	£520,000	£742.95	£69.02	
		Unit D3 & 4	13621	1265	2018	Freehold	£845,000	£667.78	£62.04	Bought by Kingsley Asset Finance
		Unit MI2	775	72	2015	Freehold	£80,000	£1,111.15	£103.23	
		Unit MI3	775	72	2015	Freehold	£80,000	£1,111.15	£103.23	
		Unit MD5	5400	502	2016	Freehold	£315,000	£627.92	£58.33	
		1 Matrix Way	47478	4411	2018	Leasehold	£261,129	£59.20	£5.50	

		D2 Binary Court	4779	444	2016	Freehold	£553,200	£1,246.03	£115.76		
Eaton Point	Buckshaw Village, Chorley PR7 7NG, UK	Unit 1	47500	4413	2019	Freehold (Investment)	£3,600,000	£815.82	£75.79	Refurbished unit, part of Chancery Development. Rental Income - £260,000	
		Unit 3A and 3B	7589	705	2019	Freehold	£913,290	£1,295.45	£120.35		
		Unit 3C	3358	312	2018	Freehold	£330,500	£1,059.44	£98.42		
		Unit 3D	3358	312	2020	Freehold	£339,158	£1,087.19	£101.00		
		Unit 3E	3358	312	2018	Freehold	£330,500	£1,059.44	£98.42		
		Unit 3F	3358	312	2020	Freehold	£340,000	£1,089.89	£101.25		
		Unit 3G	3358	312	2018	Freehold	£336,800	£1,079.63	£100.30		
		Unit 3H	6629	616	2019	Freehold	£710,000	£1,152.91	£107.11		
		Unit 3I	4166	387	2019	Freehold	£604,800	£1,562.79	£145.18		
		Unit 3J	3375	314	2021	Freehold	£361,125	£1,151.78	£107.00	Purchased by Kifinas Commercial Estates	
		Unit 3K	3375	314	2021	Freehold	£498,000	£1,588.33	£147.56		
			3375	314	2019	Freehold	£924,845	£2,949.71	£274.03	Savills	
		Unit 3L	5345	497	2019	Freehold	£567,051	£1,141.98	£106.09	Purchased by Kifinas Commercial Estates	
Unit 3M	4607	428	2018	Freehold	£671,746	£1,569.50	£145.81	Used EPC Measurements			
Amethyst Court	South Rings,	Amethyst Court	42900	3985	2021	Leasehold	332,475	£83.42	£7.75		Tenant - Argos

	Preston PR5 6BZ	Amethyst Court	42900	3985	2022	Freehold (Investment)	£8,350,000	£2,095.14	£194.64		Rental Income £332475
		Tornado 70, Speke and Amethyst Court, Preston	109,900	10210	2022	Freehold (Investment)	£18,045,000	£1,767.44	£164.19	B8 Real Estate	2 newly constructed Sainsbury's warehouse facilities, to be occupied by Argos. Speke -
Dollywaggon Way/Roundhouse Court	South Rings, Preston PR5 6DA	1&2 Dollywaggon Way	1701	158	2018	Long Leasehold	£199,000.00	£1,259.49	£117.01		1000 year leases
		3 Dollywaggon Way	850	79	2018	Long Leasehold	£100,000.00	£1,265.82	£117.59		
		4 Dollywaggon Way	850	79	2018	Long Leasehold	£100,000.00	£1,265.82	£117.59		
		5 Dollywaggon Way	850	79	2018	Long Leasehold	99,500	£1,259.49	£117.01		
		6 Dollywaggon Way	850	79	2018	Long Leasehold	99,500	£1,259.49	£117.01		
		7 Dollywaggon Way	646	60	2018	Long Leasehold	£75,000.00	£1,250.00	£116.13		
		8 Dollywaggon Way	646	60	2018	Long Leasehold	£89,500.00	£1,491.67	£138.58		
		9 Dollywaggon Way	646	60	2018	Long Leasehold	£77,500.00	£1,291.67	£120.00		
		10 Dollywaggon Way	646	60	2018	Long Leasehold	£77,500.00	£1,291.67	£120.00		

11 Dollywaggon Way	646	60	2018	Long Leasehold	£77,500.00	£1,291.67	£120.00		
12 Dollywaggon Way	753	70	2018	Long Leasehold	£89,500.00	£1,278.57	£118.78		
14 Dollywaggon Way	753	70	2018	Long Leasehold	£89,500.00	£1,278.57	£118.78		
15 Dollywaggon Way	753	70	2018	Long Leasehold	£87,500.00	£1,250.00	£116.13		
16 & 17 Dollywaggon Way	1507	140	2018	Long Leasehold	£175,000.00	£1,250.00	£116.13		
20 Dollywaggon Way	753	70	2018	Long Leasehold	£87,500.00	£1,250.00	£116.13		
21 Dollywaggon Way	646	60	2018	Long Leasehold	£75,000.00	£1,250.00	£116.13		
22 & 23 Dollywaggon Way	1292	120	2018	Long Leasehold	159,500	£1,329.17	£123.48		
26 Dollywaggon Way	872	81	2020	Long Leasehold	95,417	£1,177.98	£109.43		
27 Dollywaggon Way	646	60	2020	Long Leasehold	95,417	£1,590.28	£147.74		
28 & 29 Dollywaggon Way	1292	120	2019	Long Leasehold	95,417	£795.14	£73.87		

30 & 31 Dollywaggon Way	1292	120	2019	Long Leasehold	95,417	£795.14	£73.87		
32 & 33 Dollywaggon Way	1292	120	2019	Long Leasehold	62,349	£519.58	£48.27		
36 Dollywaggon Way	646	60	2018	Long Leasehold	84,500	£1,408.33	£130.83		
37 Dollywaggon Way	904	84	2018	Long Leasehold	£109,500	£1,303.57	£121.10		
38 Dollywaggon Way	904	84	2020	Long Leasehold	£109,500	£1,303.57	£121.10		
39 & 40 Dollywaggon Way	1668	155	2018	Long Leasehold	£204,000	£1,316.13	£122.27		
41 Dollywaggon Way	646	60	2018	Long Leasehold	£94,500	£1,575.00	£146.32		
42 Dollywaggon Way	904	84	2018	Long Leasehold	£109,500	£1,303.57	£121.10		
43 Dollywaggon Way	904	84	2018	Long Leasehold	£109,500	£1,303.57	£121.10		
46, 47 & 48 Dollywaggon Way	2551	237	2018	Long Leasehold	£84,666	£357.24	£33.19		
49 Dollywaggon Way	850	79	2018	Long Leasehold	£114,500	£1,449.37	£134.65		
50 Dollywaggon Way	850	79	2018	Long Leasehold	£209,000	£2,645.57	£245.77		

Source: Multiple, 2023

### Appendix 3

List of Transactions which inform Paragraphs 4.40-4.41

*Multiple Sources including EGi Radius database, contacts with agents and review of agents websites.*

Location	Scheme Address	Sqm	Transaction Date	Price Achieved	£/sqm	£/sqft	Yield. Percent	Agents	Comments
Warrington	Unit 4c Stretton Distribution Centre, Grappenhall Lane, Appleton, Warrington, WA4 4QT	1,672	03/07/2020	900,000	£538.21	£50.00	3.37	Read Property Associates Limited	
Warrington	Distribution Point, Clayton Road, Birchwood, Warrington, North West, WA3 6PH	10,162	01/11/2021	15,450,000	£1,520.40	£141.25	3.59		
South Ribble	18, Roundhouse Court, South Rings Business Park, Bamber Bridge, PR5 6DA	3,985	01/12/2022	8,350,000	£2,095.14	£194.64	3.73		Amethyst Court - Tenant Argos
Bolton	Units 8-10, Lostock Industrial Estate, Cranfield Road, Bolton, BL6 4SB	3,344	25/07/2000	2,110,000	£631.00	£59.00	4.35		

Warrington	Warehouse, Gemini West Business Park, Europa Boulevard, Warrington, WA5 7WH	6,782	14/05/2021	10,400,000	£1,533.54	£142.47	4.40		
Warrington	Gemini West Business Park, 15d Europa Boulevard, Warrington, WA5 7WH	6,804	23/04/2021	10,322,611	£1,517.20	£140.95	4.40	JLL	
Speke and Preston	Tornado 70, Speke and Amethyst Court, Preston	10,210	2022	£18,045,000	£1,767.44	£164.19	4.50	B8 Real Estate	2 newly constructed Sainsbury's warehouse facilities, to be occupied by Argos.
Warrington	Melford Court, Hardwick Grange, Warrington, WA1 4RZ	10,601	01/12/2021	11,450,000	£1,080.13	£100.34	4.73		
Warrington	Adlington Court, Risley Road, Warrington, WA3 6PL	2,346	01/01/2022	2,385,000	£1,016.70	£94.45	4.74	Edwards and Co Chartered Surveyors	

Preston	Units 4-6 Kirkham Trading Estate, Freckleton Road, Kirkham, Preston, PR4 3RB	2,042	22/03/2022	1,109,000	£543.21	£50.46	4.80	Eckersley	Modern Industrial Unit with a yard
Manchester	29 Shield Drive, Wardley Industrial Estate, Manchester, M28 2QB	3,898	02/12/2020	2,530,000	£649.04	£60.30	4.83	Lamb & Swift Commercial	
Wigan	Otterswood Square, Martland Park, Wigan, WN5 0LF	1,753	22/12/2020	£1,670,000	£952.79	£88.51	5.32		1980s built, multi let industrial. Rental Income - 94,400

Source: Multiple, 2023

SIGNED:  \_\_\_\_\_

DATE: 30<sup>th</sup> January 2023 \_\_\_\_\_