

Representor: FI Real Estate Management Ltd (FIREM)

Contact: Mr John Francis (Plan Red)

Representor ID: A31

STATEMENT OF EVIDENCE

Evidence is co-authored by Gateley, Icenii, JLL, Plan Red & FIREM

Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

(Policies SS1, SS2)

Issue 2 – Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

Response to Question 2.1:

It is the representor's position that the proposed spatial strategy and distribution of development, least insofar as it relates to employment land and related developments, cannot be regarded as robust nor is it supported by an effective and up to date veracious evidence base. There are a number of deficiencies and flaws in the evidence base. These are set out under evidence presented in connection Matters 1A & 1B, 4 and 8 & 9.

Point (a):

It is the representor's position that while the vision is fine in the sense of its general and strategic targets and nice to have aspirations, but the key question remains whether any of the key development targets will and can be delivered because of concerns relating to CLLPs' housing land and employment land requirements and related development delivery strategies. Evidence to back up this claim is set out under Matters 1A & 1B, Matter 4 and Matters 8 & 9.

Point (b):

No comment.

Point (c):

The focus of directing development to the larger urban settlements is regarded as largely acceptable and sound, but this does not apply to all forms of development. Some developments are best located close to but outside of the main settlements of the CL area. An example of this is major strategic developments for XL Big Box sized employment units for logistics use. Such developments are best located adjacent or very close to motorway junctions. FIREM has presented specific evidence on this matter in relation to Matter 4 and Matters 8 & 9. Its case is that there is an unmet need for such development in the area covered by the CLLP, particularly Chorley Borough, and that the plan does not make appropriate provision to meet the need.

Point (d):

Same point as made in above response applies to this question.

Point (e):

Often rural locations are the best locations for specific forms of development. For example, the best strategic sites for XL Big Box developments for logistics uses are typically in rural areas. Whilst they may be 'rural' they can also be strategically positioned. This is driven by need to be adjacent or very close to major strategic infrastructure including motorway junctions. Central Lancashire is well positioned in this regard by reference to M6, M61 and M65 motorways, which in turn link to M55, M58, M60 and M56.

Point (f):

In short, no it does not. There is no recognition of the Government's UK Modern Industrial Strategy, in either appendix or footnote form. Nor is there a proper reflection on the focus on growth in this sector which includes major logistics which can be delivered by way of XL Big Box units. This is discussed further in JLL's Employment Statement, included as an Appendix (Section 8.9-8.11) to this Statement of Evidence. This response is further expanded through points and evidence presented on Matters 8 & 9.

Response to Question 2.2:

No response made.

Response to Question 2.3:

Same point as made in relation to Question e) and c).

Response to Question 2.4:

FIREM and its advisers have concerns that, when the true employment needs of the three boroughs making up CL are considered in detail, it becomes apparent that certain types and profiles of sites which are needed to deliver specific forms of employment development, for example, XL Big Box for logistics use, are not proposed in the draft CLLP. This begs the question as to whether the identification and allocation process, specifically whether it is based on a robust and objective process, is fit for purpose. It is the representers' position that this is not the case.

Point (a):

FIREM has significant concerns regarding the overall site selection process, with emphasis on sites for employment development. A case in point is Strategic Site SS5 – Preston West. Detailed evidence by the representers critiquing this site is set out under Matter 4. In summary, this confirms that the site is far from the ready wrapped, easily delivered development opportunity Policy SS5 makes out. Indeed, the Topic Paper and policy on the site confirm the site will not be fully delivered within the plan period. The lead developer, Harworth Developments, suggest it is unlikely all of the employment land allocation, 63.3 ha, will be delivered. BE Group, authors of the

2022 and 2024 ELRs in support of the CLLP, raise concerns about the potential of the site for the level and type of employment development it is expected to deliver.

We also consider that the mixed use site at Cuerden, covered under Policy EC6.1, is not capable of delivering the level of employment development expected of it following the sale of some 15.5 ha of land to an NHS Trust for development of a new hospital.

And, as set out in evidence on Matters 8 & 9, it is FIREM's position that the CLAs have not relied on fully up to date and pertinent evidence and, importantly, did not give proper weight to the views and evidence of private sector parties like FIREM. FIREM is an experienced and well-resourced commercial developer that is very experienced in delivering development plan allocations for commercial and employment uses throughout the UK including CL.

In conclusion, it is FIREM's position that the CLLP site selection cannot be regarded as transparent and sound, and in a number of cases key issues and constraints have not been fully or appropriately taken into account. Consequently, one has to ask whether the CLLP can be regarded as sound and will deliver the brief set for it, including in the sense of whether there is any realistic prospect its full employment land requirement will be delivered over the plan period and whether the related development delivery strategy will deliver the developments expected and required to meet the need.

Point (b):

It is FIREM's position that this is not the case, as set out in responses to earlier, linked questions. In relation to aspects of Policy SS5 Preston West it seems as though some identified issues and constraints have been ignored or given little weight. And a related point made in evidence presented under Matter 4, is the fact this site is proceeding as the Blue Ribbon allocation of CLLP without the support of a comprehensive masterplan, which we say is critical for identifying constraints to development and presenting a layout that works around them.

Point (c):

Same point as made in response to point b.

Point (d):

Same point as made in response to Question e).

Response to Question 2.5:

No comment

Response to Question 2.6:

No comment.

Response to Question 2.7:

Yes, omissions and modifications are required. In summary, based on evidence presented in relation to this Matter and also in relation to Matter 2, Matter 4 and Matters 8 & 9, it is FIREM's position that the following actions are required:

- i. Reworking of the 2024 BE Group ELR to ensure it fully and properly takes into account the true employment land needs, for all forms of employment development, of the area covered by CLLP. This is likely to, as our evidence presented in relation to Matters 8 & 9 suggests, see the employment land requirement needing to be increased and either new development opportunities identified or the need for specific forms of employment development to be supported, including for XL Big Box units.
- ii. General review of likelihood of sites included in the draft plan for employment development to ascertain whether there is any serious likelihood they can and will be delivered for employment development over the plan period.
- iii. Proper review of the true potential of Site SS5 Preston West, by reference to known constraints and general development potential, to deliver development and by when over the plan period, including how much and what types of development.
- iv. Ditto but in relation to Policy EC6.1 Cuerden with emphasis on employment land.
- v. Revised policies and related allocations and proposals to deliver all of the above, which in our view, so as to capture the best and most suitable sites for certain forms of employment development, also warrants a review of Green Belt across the area covered by the CLLP.