
Examination of the Warrington Local Plan

Examination in Public Hearing Statements for Matters 3, 5 and 6c

Hearing Statements prepared by Savills (UK) Limited on behalf of St Modwen Developments Limited

Introduction and Executive Summary for Statements under Matters 3, 5 and 6c

(Respondent No. 1420)

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1. Introduction and Executive Summary

- 1.1 The Hearing Statements subject that have been provided are prepared on behalf of St. Modwen Developments Limited (herein referred to as 'St. Modwen') by Savills (UK) Limited in relation to the Examination in Public ('EiP') into Warrington Borough Council's Updated Proposed Submission Version Local Plan 2021 - 2038 (the 'emerging Local Plan').
- 1.2 The Statements are submitted in relation to a site to the east of Junction 21 of the M6 in Warrington.
- 1.3 The site presents a sustainable and well-located development opportunity to make a significant and positive contribution to meeting Warrington's objectively assessed employment land needs over the emerging Local Plan-period. The site is presently designated in the Green Belt and measures at total of approximately 71.5 hectares, with approximately 40 hectares of the land available for employment development. The extent of the site is shown on the plan included at **Appendix 1**. All of the land is under the control of St. Modwen.
- 1.4 The Statements and the information provided during the last Regulation 19 consultation period of the emerging Local Plan (UPSVLP 1420) demonstrate that Warrington has a requirement to allocate circa at least a further 195 hectares of land for Industrial and Logistics ('I&L') development over the emerging Local Plan period to meet its development needs. This forms the basis of the 'exceptional circumstances' to remove the site from the Green Belt to meet objectively assessed employment land requirements.
- 1.5 Accordingly, the Statements put forward the case for the site to be allocated in the emerging Local Plan for employment land use purposes in the context of the Matter, Issues and Questors identified by the Inspectors. They demonstrate that at present the emerging Local Plan cannot currently be considered 'sound' as it does not meet the requirements of the tests included at Paragraph 35 of the National Planning Policy Framework (the 'NPPF').
- 1.6 In particular, the evidence base has significantly under-assessed the objectively assessed need for employment land. Savills have provided a robust assessment of the objectively assessed need. This requires further Green Belt sites to be allocated to meet this minimum level of need. The Plan is therefore currently unsound but can be made sound by the allocation of this site and the proposed Main Modifications set out in the Statements.

1.7 The Statements therefore provide evidence that the emerging Local Plan is not:

1. Positively prepared as it does not provide a strategy that meets Warrington's objectively assessed needs.
2. Justified as it is not based on proportionate evidence. The proportionate evidence demonstrates that there is a significant requirement for additional land for employment development to meet the area's needs.
3. Effective as a more realistic assessment demonstrates that not all of the land presently allocated for employment needs is likely to be delivered over the emerging Local Plan period. This will further increase the objectively assessed need for employment land over the Plan-period.
4. Consistent with national policy as the Plan does not place 'significant weight' on the need to support economic growth and productivity as required by Paragraph 81 of the National Planning Policy Framework ('NPPF'), and nor does it make sufficient provision for storage and distribution operations as required by Paragraph 83.

1.8 The Plan is therefore demonstrably unsound. The Statements therefore conclude that amendments are required to the Local Plan in order for it to be made sound. These amendments put forward in the Statements are summarised as:

1. A new policy that we term as Policy MD7 is required to allocate the site for employment development purposes to assist in ensuring that objectively assessed employment needs in Warrington can be met over the Plan period and beyond (in accordance with the NPPF).
2. Amendments to Policy DEV4 to provide details of the objectively assessed need for employment land in Warrington based on a robust and up to date evidence base for assessing employment land requirements, and the confirmation that the site will contribute to meeting that requirement.

3. Amendments to Policy GB1 and the associated Figure 6 to confirm that the site has been removed from the Green Belt.
4. A further amendment to Policy GB1 to resolve the tension between: (i) the Council acknowledgement (Paragraphs 4.2.22 and 5.1.19 of the emerging Local Plan) that it needs to review its employment land requirements before the end of the Plan-period and (ii) a policy objective in Policy GB1 that Green Belt boundaries won't be reviewed until long after the Plan-period.
5. Amendments to Policy MD3 to reflect the reality and nature of development at Fiddler's Ferry.

1.9 By way of background, St. Modwen is a national developer with a specialism in the delivery of large-scale strategic I&L sites.

1.10 The site is presently designated within the Green Belt and the Statements, alongside the Promotion Document referred to in the Statements put forward the case for the allocation of the site for employment development in order to meet strategic I&L development needs for Warrington. As these Statements and the Promotion Document demonstrate there is a significant current unmet need for I&L development in Warrington that needs to be accounted for in the emerging Local Plan. Accordingly, the case for the allocation of the site is that:

1. It would meet an identified need for employment development; and
2. Its development is deliverable.

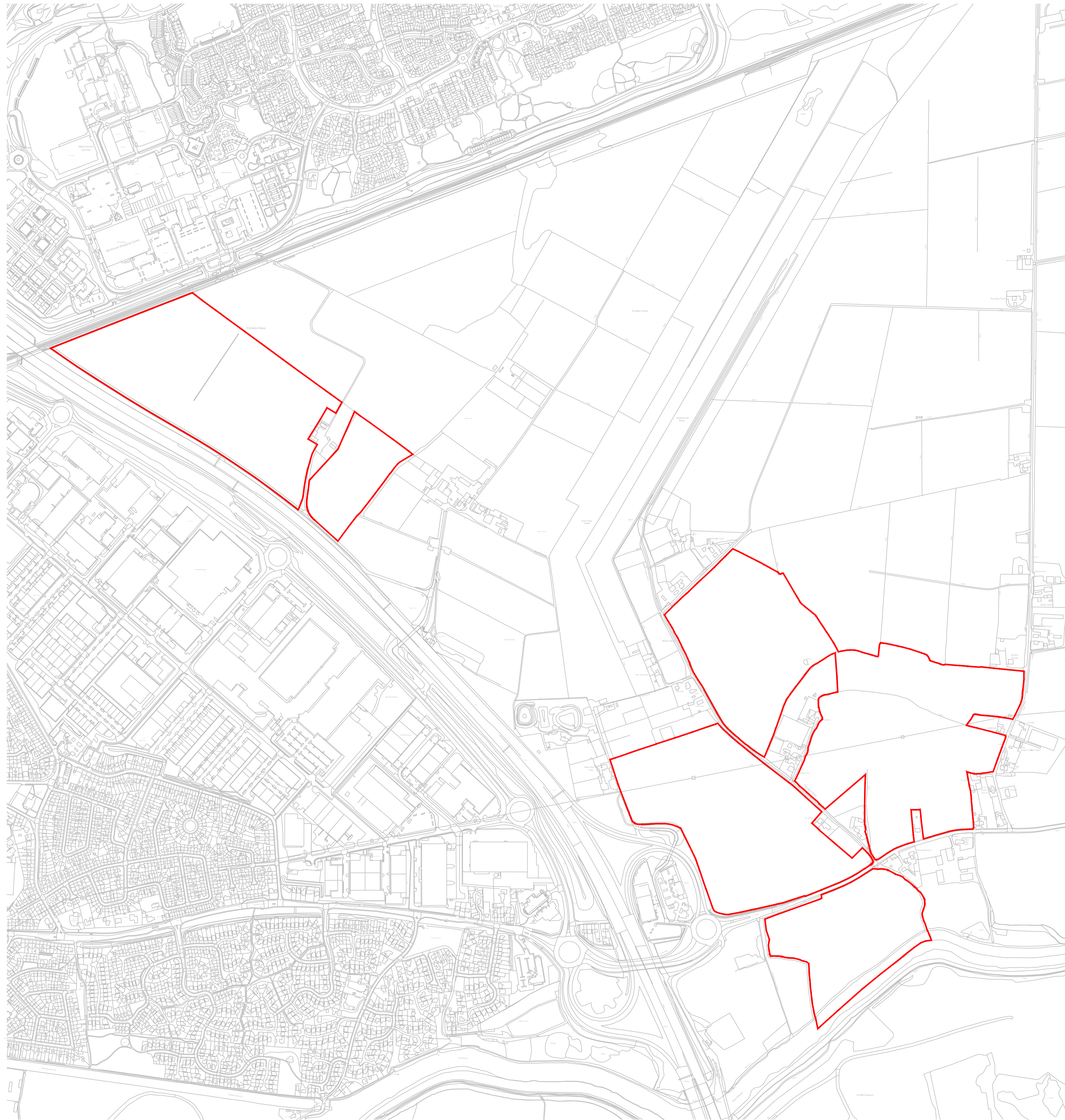
1.11 The detailed analysis provided in the Statements and the accompanying Promotion Document (and in particular Appendix D of the Promotion Document (i.e. 'the Savills Employment Needs Assessment' 'SENA')) demonstrate that there is a substantial objectively assessed need for I&L development to support Warrington's growth requirements. This supports our conclusion in relation to the substantial unmet need for employment land in the emerging Local Plan, meaning that we therefore consider that it cannot be found sound at this stage.

1.12 The evidential need in the SENA exceeds the need forecast by the Local Planning Authority's ('LPA's') advisors, BE Group, in the Warrington Economic Development Needs Assessment Refresh 2021 ('EDNA (2021)') that forms part of the evidence base for the emerging Local Plan. Both Appendix D of the Promotion Document and the Statements demonstrate that the LPA's evidence is not an appropriate or sound evidence base upon which to forecast employment land need. The Statements demonstrate that at least an additional circa 195 hectares of land is required to be allocated for employment land purposes in Warrington.

1.13 In addition to the above, St. Modwen has prepared a statement with the adjacent landowner, Patrick Properties, which is submitted under letter, dated 22 July 2022. The letter sets out that if the Inspectors are minded to seek the allocation of the whole of both the St. Modwen and the Patrick Properties (the 'Parties') parcels of land for employment and infrastructure development, both of the Parties are committed to working with each other to ensure the comprehensive development of both parcels of land to realise development that delivers sustainable economic growth in Warrington and provides for wider social and environmental benefits in the delivery of sustainable development at the site. The sites are therefore promoted separately and collectively. Further matters in relation to that letter are not covered within the Statements subject to this document, but confirmation that a letter has been issued is included within this document for completeness on all matters raised in relation to the site.

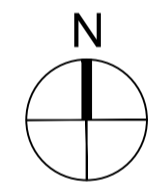
1.14 We look forward to discussing our evidence further at the forthcoming EiP.

Appendix 1 – Site Plan

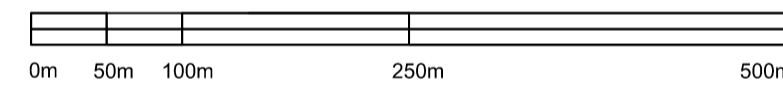


Contractors are not to scale dimensions from this drawing

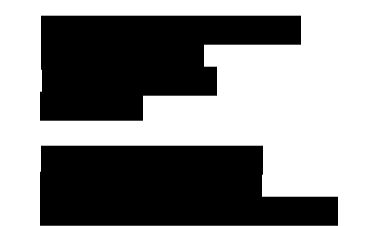
Key
— Site Boundary



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 Architecture Urbanism Design



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Client
St. Modwen
 Project
Rixton - Junction 21 of the M6

Description
Site Location Plan

Status
DRAFT

Scale	Drawn	Date
1:5000@A1	BM	July '22
Job number	Drawing number	Revision
34799	01-211	B

Original size 100mm @ A1 Copyright Broadway Malyan Limited