



Examination of the Warrington Local Plan

Examination in Public Hearing Statement for Matter 6c

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

(Respondent No. 1420)

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1. Statement for Matter 6c: Main Development Area: Fiddler's Ferry

Issue: Whether the Fiddler's Ferry Main Development Area (Policy MD3) is justified, effective and consistent with national policy.

1.1. This Statement deals only with Questions 16, 18 and 19.

Questions:

16. Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?

1.2. No comment is made in relation to the viability of the development and developer interest as the press has reported that Peel has entered into a deal for the development of Fiddler's Ferry¹. However, we comment with cross-reference to Paragraphs 7.2.28 – 7.2.30 of the SENA (Appendix D of **Appendix 1**) that we do not consider all of the employment development to be deliverable over the period that is suggested in the Masterplan Delivery Programme included at Section 5 of the Fiddler's Ferry Masterplan, dated April 2021, provided with the representation at the previous Regulation 19 Consultation stage by SSE Thermal (Respondent No. 444). A copy extract of the Masterplan Delivery Programme is included at **Appendix 2**. We consider that the estimate to deliver approximately 4,000,000 sq. ft of employment development by 2030 is not realistic for this particular site given:

- **Costly and time consuming remediation is required:** demolition and remediation is yet to start, and will likely take several years based on our knowledge of other power station redevelopments such as Rugeley Power Station. By way of a comparison decommissioning, demolition and remediation to facilitate the redevelopment of Rugeley Power Station in Cannock Chase began in June 2016 and is expected to conclude in the Winter 2022². It has also been reported in the press that the demolition of Fiddler's Ferry

¹ <https://www.placenorthwest.co.uk/peel-nre-buys-fiddlers-ferry/>

² <https://www.business-live.co.uk/economic-development/energy-giant-engie-progress-development-20759255;>
<https://www.engie.co.uk/about-engie/news/engie-gets-the-green-light-for-rugeley-redevelopment/>

will take between 40 – 50 months³. Even if demolition was commenced this year, which is unlikely given the site does not yet have an allocation for development, that would take the time-period for demolition until approximately the start of 2026. Applying a further period for remediation, it follows that the six year period adopted for the decommissioning, demolition and remediation to facilitate the redevelopment of Rugeley Power Station in Cannock Chase taking it until at least 2028 before any start on site can be made and for the reasons set out below in relation to planning timeframes, we consider that the actual start on site will be beyond this date.

- **Planning timeframes are tight: Appendix 2** estimates outline planning permission to be granted in 2023 for Phase 1 (which includes the employment land alongside a minimum of 860 homes) and the approval of reserved matters by 2024 / 25. This timeframe is considered optimistic given the complexities of the site as mentioned above. By way of a comparison, the Fawley Power Station in New Forest, was only granted outline planning permission in July 2020 following detailed negotiations with New Forest District Council and The New Forest National Park Authority, over a period of 5 years⁴. It is also unlikely that planning permission would be granted in the same year that the new Local Plan will be adopted (earmarked for July 2023 in the LDS). We consider an outline planning application submission in 2024 / 25 following detailed consultation with the community and stakeholders, and engagement and negotiation with the Local Planning Authority including Environmental Impact Assessment scoping to be more realistic, particularly if the emerging Local Plan is to be adopted by summer 2023. This would lend itself to an optimistic time-period for the grant of outline planning permission in 2026 / 27 to be achieved taking account of the consideration of the scale of the development, the issues that would be raised and timelines for the completion of Section 106 Agreements etc in the event permission is granted. We consider that to be more realistic as we do not believe most delivery partners would invest the considerable resources in undertaking the various technical studies to support a planning application without the site's allocation being confirmed following EiP. We therefore consider that reserved matters would be unlikely to be submitted until 2027 / 28 and then approved by 2028 / 29. That timeline is more optimistic than the timeline that occurred in the Fawley Power Station example. Necessary highway approvals and discharges of condition would be required taking the actual likely start on site date to approximately 2030.

³ <https://www.peaktraveltime.com/demolition-of-fiddlers-ferry-to-take-40-to-50-months-and-more-likely-to-begin-this-yr/>

⁴ <http://news.fawleywaterside.co.uk/outlinepermission/>

- **Significant enabling infrastructure:** The EDNA (2021) acknowledges that the employment development will likely be reliant, at least in part, on the delivery of housing on the part of the site that sits within the Green Belt. Therefore, this part of the site would need to be released from the Green Belt to provide housing, which in turn, would support the delivery of employment floorspace. Highways England approvals will also be required that will take some time to secure. Given the amount of enabling infrastructure and demolition and remediation works required, viability will also become a key consideration.
- **Unrealistic build out rate:** Construction of Phase 1 is expected to begin in 2024 / 25, with the employment floorspace delivered and fully occupied by 2030, indicating a construction period of around five to six years. In order to deliver the proposed 4,000,000 sq. ft of I&L floorspace over a five to six years period envisaged in the Masterplan Briefing Note, a build out rate of circa 666,666 sq. ft – 800,000 sq. ft per annum would be required to meet that timeframe. This is an extremely aggressive rate (as evidenced in Table 7.4 of the SENA) for a site that is not in a prime location for I&L' development and also has significant enabling infrastructure, demolition and remediation requirements. We do not consider it to be a reasonable assumption. Table 7.4 of the SENA provides a series of take-up rates for much better located I&L development sites than Fiddler's Ferry and provides an average annual take-up rate of approximately 236,000 sq. ft per annum from those developments. Accordingly, it is considered that a take-up rate of 250,000 sq. ft per annum would be more representative, although still optimistic, for Fiddler's Ferry. From a start on site of 2030, this would deliver 2,000,000 sq. ft of development by 2038 (i.e. over the emerging Local Plan-period), or approximately half of the amount of employment floorspace that Fiddler's Ferry is intended to deliver.
- **Not a prime I&L location:** Prime locations are those adjacent to a motorway junction (such as Junction 21 Birchwood) or major freight handling infrastructure. Fiddler's Ferry is not a prime location. This will impact the attractiveness of the site to occupiers and its delivery rate. As evidenced in the Figure 7.4 of the SENA, the local area to Fiddler's Ferry is not a large unit location of note (greater than 100,000 sq. ft). Larger units have been driving the market nationally and within Warrington. Fiddler's Ferry is not being seen as a prime location is shared by those agents consulted with as part of the EDNA and outlined in Table 6, Page 52 of the EDNA (2021).

18. What is the expected timescale and rate of development and is this realistic?

1.3. See commentary above in relation to Q16 above.

19. Are any main modifications necessary for soundness?

1.4. We do not object to the policy designation of Fiddler's Ferry and for the reasons set out our response to Matters 3 and 5, we consider that there is a substantial need for additional employment land even if the delivery of the whole of Fiddler's Ferry is factored into the supply of employment land supply over the Local Plan-period. However, for the reasons outlined above, we consider that it is more representative to anticipate that approximately half of the employment land at Fiddler's Ferry will be delivered over the emerging Local Plan-period and that this should therefore be acknowledged in a main modification to Policy MD3.

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