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Dear Kerry,

Response to CD10 Note on Employment Capacity of Development Land and CD10a Additional Note responding to Inspectors' Queries For Taylor Wimpey, Bloor Homes, Lone Star Ltd and Mulbury Homes (Grappenhall) Ltd
Representor Number: 1431

After the hearing sessions, Warrington Borough Council (WBC) provided a statement which considers the employment capacity of development land (**CD10**) and an additional statement on employment capacity to answer queries raised during the hearing sessions (**CD10a**). This letter and accompanying Jobs Estimate Note provide our response to those statements on behalf of Taylor Wimpey, Bloor Homes, Lone Star Ltd and Mulbury Homes (Grappenhall) Ltd.

We made comments on the employment capacity of development land in our hearing statement on Matter 4: Housing Need and the Housing Requirement and during the relevant hearing sessions. We provided our own calculation of jobs growth utilising plot ratios sourced from Employment Land Reviews: Guidance Note, Office of the Deputy Prime Minister, December 2004, which resulted in a jobs growth figure of 44,872 over the plan period (including the applied buffer of land allocated).

The plots ratios Pegasus applied to each use were:

- Light industrial and manufacturing: 42%;
- Offices: 50% (the ODPM document suggests plot ratios could be up to 40%, however a slightly higher ratio was used to account for the fact that offices can often be developed more densely);
- Warehousing: 50% (the ODPM document suggests ratios could be 40-60% – this mid-point was used);

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Our main area of concern with CD10 and CD10a relates to BE Group's use of a plot ratio of 39%, which has been applied to all use classes.

This is inconsistent with other work undertaken by BE Group elsewhere, notably the work undertaken for the Central Lancashire Employment Land Study Update in February 2022. In that document BE Group assume much higher plot ratios for office floorspace in specific parts of Central Lancashire. The relevant extract from the Central Lancashire Employment Land Study Update is enclosed.

Ultimately, BE Group applied plot ratios to office space of 78% for Chorley and South Ribble and 200% for Preston. Both these ratios result in a far higher amount of office floorspace than a ratio of 39%, which has been applied to Warrington.

The use of a flat plot ratio of 39% across all use classes has not been justified, and the impact of higher plot ratios on job numbers and the implications this would have on the housing need and housing requirement needs further consideration.

As it stands, there is a real risk that the number of homes derived from the standard method will be insufficient in providing the required increase in working age population to support the number of additional jobs likely to be created over the plan period.

This should also be considered against the backdrop of the very strong annual jobs growth in Warrington. ONS released new jobs data last week for 2021., showing job change in local authorities between 2015 and 2021. Annual growth in Warrington has been very strong (2.5%), with only Salford and Manchester having higher growth in the whole of the North West region.

Yours sincerely

Sebastian Tibenham
Executive Director



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Pegasus Jobs Estimate Note (NO14v1)
Extract from Central Lancashire Employment Land Study Update 2022