
Examination of the Warrington Local Plan

Examination in Public Hearing Statement for Matter 6c

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

(Respondent No. 1420)

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

- 1.1. This Addendum Statement is submitted following the production of an updated timeframe in relation to the delivery of the employment development at Fiddler's Ferry (Document Reference CD31).
- 1.2. The updated timeframe contained at Appendix 1 of CD31 remains as unrealistic as that put forward 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), which the Inspector, Andrea Mageean, confirmed at the Hearing Session into Matter 6c on 15th September 2022 there were concerns with. It follows that we conclude that the updated timeframe cannot robustly be relied on for considering the delivery of the Fiddler's Ferry employment development and continues to not be based on any evidence.
- 1.3. The updated timeframe estimates that there will be a start on site for the delivery of the employment development in January 2024 and that it will be finished by March 2030. As confirmed at the fourth bullet of Paragraph 1.2 of the St Modwen Matter 6c Statement, a construction period of six years would result in a build out rate of 666,666 sq. ft per annum. This is an extremely aggressive build out rate that would be one of the best build out rates in the country (as evidenced at Table 7.4 of the Savills Economic Needs Assessment ('SENA') included at Appendix D of Appendix 1 of the St Modwen Matter 6c Statement, which puts forward actual build out rates from nearby and comparable sites). Such a build out rate is therefore not considered to be realistic, particularly for a site that is not in a prime location for Industrial and Logistics ('I&L') development (as acknowledged in the Council's evidence), and on one which has significant enabling infrastructure, demolition and remediation requirements.

- 1.4. It is therefore not a reasonable delivery period that can be relied on. 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. That is a more realistic build out rate as a build out rate that is almost three times greater than that cannot be considered to be realistic, robust or justified. This goes to the heart of the soundness of the emerging Local Plan as the delivery rates put forward for a key strategic employment site cannot be relied on resulting in a requirement for additional employment land to be allocated.
- 1.5. Further, the timeframe essentially anticipates a delivery rate of 16.83 hectares of employment land per annum from a single site (i.e. site area 101 hectares (Policy DEV4) divided by six years). Table 6 of the Draft Warrington Local Plan estimates that Warrington's employment land supply is 308.58 hectares and therefore the overall delivery rate for the entire Local Plan (i.e. 18 year period), is 17.14 hectares per annum. Accordingly, the updated timeframe still maintains that the delivery rate on one particular site, will be commensurate with the Council's forecast overall delivery rate for the Borough. That is not a realistic proposition.
- 1.6. Further still, the start and completion points for certain phases are not robust and a full consideration of the development stages is not included within the timeframe, namely:
 1. The Phase 2 and 3 employment developments are forecast to begin – 7th April 2025 and 6th July 2026 respectively – before the demolition on the existing power is forecast to have finished on the 28th December 2026. No evidence is provided to show how those phases of development can commence before the existing power station is demolished and in the absence of that evidence it cannot be considered realistic to assert that those phases will be ready for construction to commence in the timeframes put forward.
 2. A three year time period for demolition is not realistic for the reasons outlined in the first bullet at Paragraph 1.2 of the St Modwen Matter 6c Statement when considered against comparable projects that have already taken place and have required a much longer period for demolition. No evidence has been provided to demonstrate why the demolition on this site will be undertaken more quickly than the actual evidenced examples provided. It is therefore realistic to rely on the timeframes of comparable, already completed demolition programmes put forward than a timeframe that is not based on evidence.

3. No allowance for remediation of the site has been allowed for which will be a critical requirement. That will add substantially to the timeframe. Further evidence is required from the developer on this matter in the form of site investigation / geo-environmental advice in order to inform sensible assumptions in relation to remediation strategy and timing.

4. No allowance for the significant enabling infrastructure to deliver the site is accounted for. As confirmed at the third bullet of Paragraph 1.2 of the St Modwen Matter 6c Statement the Council's own evidence in the Economic Development Needs Assessment (2021) ('EDNA') 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, and materially delivered. The first small-scale level of housing delivery phase (150 units) is not forecast to be complete until 1st July 2030, which is after when the employment development is forecast to be completed. Given the amount of enabling infrastructure and demolition and remediation works required, viability remains a key consideration. The timeline cannot be considered to be realistic given the residential development that will be required to cross-subsidise the delivery of the employment development as confirmed by the Council's evidence would finish after the delivery of the employment development. Further evidence is therefore required to be provided by the developer on viability in order for that evidence to be considered and consulted on. The timeframe provided conflicts with the Council's evidence that supports the Local Plan, which concludes that the residential development is required to cross-subsidise the delivery of the employment development.

5. The updated timeframe makes no allowance for any applications to discharge planning conditions and the time required to put in place the necessary legal agreements associated with the development of the site including for example s106 Agreements and s278 Agreements.

- 1.7. The timeframe also envisages three detailed planning applications for the three phases, which is not realistic or common for this scale and type of site. Whilst detailed applications can form a component of delivery of a site of this scale, there is typically a significant outline element, which would come forwards with a reserved matters requirement to be added into the timeframe. The rationale behind this approach is whilst there may be some speculative development carried out as part of a development of a large scale I&L site, large proportions of the development would be built to suit specific occupiers, with outline permission usually first secured and then reserved matters secured for specific occupier requirements. This is the approach envisaged in the SSE timeframe and is also the approach being taken to the application on the Council's other large-scale I&L allocation at the South East Warrington Employment allocation (Reference 2019/34799). In addition, a hybrid approach is being taken to the extension to Omega (Reference P/2020/0061/HYBR) with the full element of that permission being designed for a specific occupier, who was also the applicant, and the remaining element of the permission being in outline. The timeframe provided in Document Reference CD31 therefore does not reflect the application process that would very likely be, and is typically, followed as evidenced by comparable applications.
- 1.8. Whilst we maintain that we do not object to the Fiddler's Ferry designation, the submitted updated timeframe is not realistic and therefore fails to meet the requirements for information requested by Inspector, Andrea Mageean following Ms Mageean's and interested parties concerns in relation to the timeframe for the delivery of development at the Fiddler's Ferry site.
- 1.9. The submitted timeframe raises even more concerns over the realism of the delivery of the site within the Local Plan period and cannot be relied on for the purposes of concluding that the Fiddler's Ferry employment development will be delivered within the Local Plan period. This goes to the heart of the soundness of the Local Plan as it means the Plan cannot meet Warrington's employment needs.
- 1.10. A realistic timeframe for the delivery of Fiddler's Ferry is set out at Paragraph 1.2 of the St Modwen Matter 6c Statement which is based on actual comparable site delivery timeframes and build out rates for employment development. That forecasts, based on 'real world' evidence of schemes that have already taken place, that half of the employment development at Fiddler's Ferry will be deliverable within the Local Plan period.

1.11. It follows that the conclusions in relation to employment land made by St Modwen during the Examination remain that:

1. Sufficient land for objectively assessed needs reflective of actual market signals has not been allocated within the Draft Local Plan. There is 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.
2. Fiddler's Ferry's forecast timeframes for delivery put forward under Document Reference CD31 are not realistic and nor are they based on actual evidence. Actual evidence from comparable developments and market evidenced build out rates for employment floorspace indicate that only half of the employment development at that site would be delivered during the Local Plan period. The updated timeframe for delivery provided to Inspectors is not realistic or robust for the reasons outlined above and does not meet the requests of the Inspectors to provide a realistic timeframe. We therefore consider that it cannot be concluded that the Local Plan is sound given sufficient land for employment purposes cannot be delivered over the Plan-period, and nor is sufficient land allocated, to meet Warrington's employment land needs. A realistic and evidenced based timeframe has been provided with the St Modwen Matter 6c Statement to support the conclusion that the employment development at Fiddler's Ferry will not be deliverable over the Plan period.
3. There is no safeguarded land for future development requirements in an area where the Council has not allocated sufficient land to meet its needs based on its evidence (as acknowledged by the Local Plan), but further where the objectively assessed needs reflective of actual market signals indicate that the need for employment land is greater than that forecast by the Council's evidence base in the EDNA and where land that is allocated (e.g. Fiddler's Ferry) will not be delivered over the Local Plan period.

1.12. It follows that in order for the Local Plan to be found sound, by means of being positively prepared, justified, effective and consistent with national policy, additional land is required to be allocated to enable Warrington to meet its objectively assessed needs for I&L development as confirmed at Paragraph 1.7 of the St Modwen Introduction and Executive Summary for Statements under Matters 3, 5 and 6c (Document Reference M3.38).