



Langtree Property Partners

Warrington Local Plan Examination

Hearing Statement – Additional Hearing
Session concerning the Employment Land
Requirement

June 2023



01 Introduction

Introduction

- 1.1 This is a Hearing Statement prepared by Gateley Legal, Spawforths and Icen Projects Ltd on behalf of Langtree Property Partners (Langtree) in respect of:
 - Additional hearing session concerning the employment land requirement.
- 1.2 Langtree has significant land interests in the area and has made representations to earlier stages of the Local Plan process. Langtree control a significant part of the Submission Draft Local Plan employment allocation, MD6 – The South East Warrington Employment Area (SEWEA).
- 1.3 The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses within this Hearing Statement directly address these questions and oral evidence / responses will be presented by Gateley, Spawforths and Icen Projects in respect of these matters.
- 1.4 Our Hearing Statement should be read in conjunction with Langtree's comments upon the Warrington Local Plan 2021-2038 Submission Version (dated November 2021), our Examination in Public Hearing Statements and our representations submitted in response to the Main Modifications in April 2023.

02 Additional Hearing Session Context

Context

- 2.1** The Inspectors state in ID10 Paragraph 3 that the representations made by Langtree Property Partners and Liberty Properties Ltd raise substantial concerns over the basis for the Inspectors' conclusions on the matter of the employment land requirement for the Borough and in light of this the Inspectors consider it appropriate to hold an additional hearing session which will only concern the issue of the overall employment land requirement for the Borough. Paragraph 8 of ID10 confirms that the focus of the additional hearing session will be the Inspectors' Interim conclusions letter (16th December 2022); the BE Group response (13th Jan 2023) and Langtree and Liberty's representations. Langtree are grateful to the Inspectors for the acknowledgement of this position and for holding the additional Hearing session to consider these matters in more detail.
- 2.2** This Hearing Statement responds to the specific issues identified in Paragraph 9 of the Inspectors note (ID10) and should be read in conjunction with Langtree's representations to the Main Modifications consultation (MMC086). Prior to responding to these points and for clarification Langtree note the following:
- 2.3** The Local Plan must be evidenced based, the relevant evidence base for the employment land requirement in the Local Plan, the focus of this hearing session, is as set out in the Councils Examination Library:
- EC1 – Warrington Economic Development Needs Assessment (EDNA) – Addendum 2022;
 - EC2 – Warrington Economic Development Needs Assessment (EDNA) – August 2021;
 - EC2a – Warrington Economic Development Needs Assessment (EDNA) – Executive Summary 2021;
 - EC3 – Warrington Economic Development Needs Assessment (EDNA) – Final Report 2019;
 - EC3a – Warrington Economic Development Needs Assessment (EDNA) – Executive Summary 2019;
 - EC4 – Warrington Economic Development Needs Assessment - Reg 18 Sites Review – 2019
 - EC5 - Economic Development Needs Assessment 2016
 - EC6 – Review of Warrington Employment Targets to 2040-2017
 - EC7 – Warrington Means Business 2020.

- 2.4 For the avoidance of doubt no new detailed employment evidence to inform the Local Plans employment land requirement, has been submitted to the Examination by the Council .
- 2.5 Langtree are supportive of the approach of the submitted Local Plan and its associated evidence base with regard to the employment land requirement and the consequential draft employment allocation MD6 (SEWEA). This Hearing Statement sets out the justification for that position.
- 2.6 Following the hearing session for Matter 4 (Housing), the Inspectors sought to understand the relationship between the housing and employment requirements. The Inspectors asked a series of questions of the Council in order understand how much employment growth would be supported by the planned employment land provision, and if this was aligned with the planned levels of housing growth, and not the scale of employment need. As discussed in Langtree's earlier representations BE Group responded to the Inspectors questions, and CD10 and subsequently CD10a were published. These submitted documents do not form detailed employment evidence.
- 2.7 The Inspectors post hearing letter (ID06), which identified a revised requirement for employment land and set out the key issues that the main modifications are required to address, equally does not form detailed employment evidence base, necessary to support the Local Plan.
- 2.8 Langtree recognise that the Council have indicated that they would accept the Inspectors' conclusions contained in ID06 with regard to the employment land requirements and hence have put forward Modifications to accommodate this position, but Langtree note that the Council also commissioned their special economic consultants BE Group to review that position.
- 2.9 The Council's specialist economic consultants, BE Group, responded on 24th January 2023 (CD67). Within that letter the BE Group set out significant concerns with the approach to the calculation of employment land taken by the Inspectors, providing evidence to support their concerns.
- 2.10 BE Group's response on behalf of the Council states that past employment land take up rates provide the best methodology for establishing future employment land needs in Warrington. BE Group raise concerns with the Inspectors' alternative approach to calculating employment land needs and state that it does not take account of the variation in job densities between different Use Classes and does not reflect the high proportion of B8 type uses in Warrington which have a lower job density than 142 jobs/ha.
- 2.11 Icen Projects Ltd are specialist employment consultants who have reviewed the Inspectors' alternative approach and who generally agree with the BE Groups' position. Icen's position is set out in Appendix 2 of Langtree's response to the Main Modifications consultation and forms the basis of the responses below.
- 2.12 Fundamentally, the Inspectors approach in their Letter of 16th December 2022 is overly simplistic and proposes a reduced employment land requirement that is not based on any recognised approach, or the models contained within the EDNA. There has been no new detailed evidence on the employment land requirement.

- 2.13** Langtree maintain their position that the employment requirement should be retained as set out in the Council's Submission Local Plan and hence that Policy MD6 - the SEWEA employment allocation should be retained within the Local Plan. Langtree's full response is contained within their representations to the Main Modifications (MMC086). However, to assist with the Additional Hearing Session a response to the Inspectors specific issues raised in Paragraph 9 of ID10 is provided in the following section.

03 Additional Hearing Session Concerning the Employment Land Requirement

Questions

- 3.1 This section of the Hearing Statement responds to the specific issues in Paragraph 9 of the Inspectors note (ID10) and should be read in conjunction with Langtree's representations to the Main Modifications consultation (MMC086).

1: Past trends in employment land/floorspace take up in different sectors.

- 3.2 National policy and guidance states that take up of past sectors is widely accepted as one of, if not the best model in determining the future land required (PPG Para 027).
- 3.3 The 2021 Warrington EDNA provides helpful and objective analysis of the take up in different sectors from 1996 onwards (Table 21), which is considered factually correct.
- 3.4 Other examples of the use of past trends include the evidence for the Greater Manchester Spatial Framework / Places for Everyone – see Employment Topic Paper July 2021 para 4.8 <https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/05%20Places%20for%20Jobs/05.01.04%20Employment%20Topic%20Paper.pdf>
- 3.5 The take up of past land / floorspace, other than where there are supply side or viability constraints, provides one of the most definitive indicators of business needs. This compares with labour supply, where the growth in local homes and workers may have no actual bearing on business needs; and labour demand, which requires complex modelling and the need to factor in both spaceless growth (jobs not in premises) as well as jobless space needs (new stock as a replacement of old that doesn't generate jobs, a key issue in warehousing).
- 3.6 IcenI has provided a charted analysis of the take up by sector below derived from the 2021 EDNA Table 21 and this has been supplemented by additional years monitoring data from Warrington AMRs. Figure 1 below clearly shows that offices were an important component of take up between 2003 and 2010 where they often were greater than industrial. Offices however dwindle

to effectively zero from 2015. The industrial development component was similar to Offices up to 2012 but then dramatically increases from that period as the strategic Omega site came forward for warehousing and distribution. This highlights the important role of the supply side dynamic through the availability of suitable sites for logistics development. It also reinforces the strength of the demand to deliver logistics development.

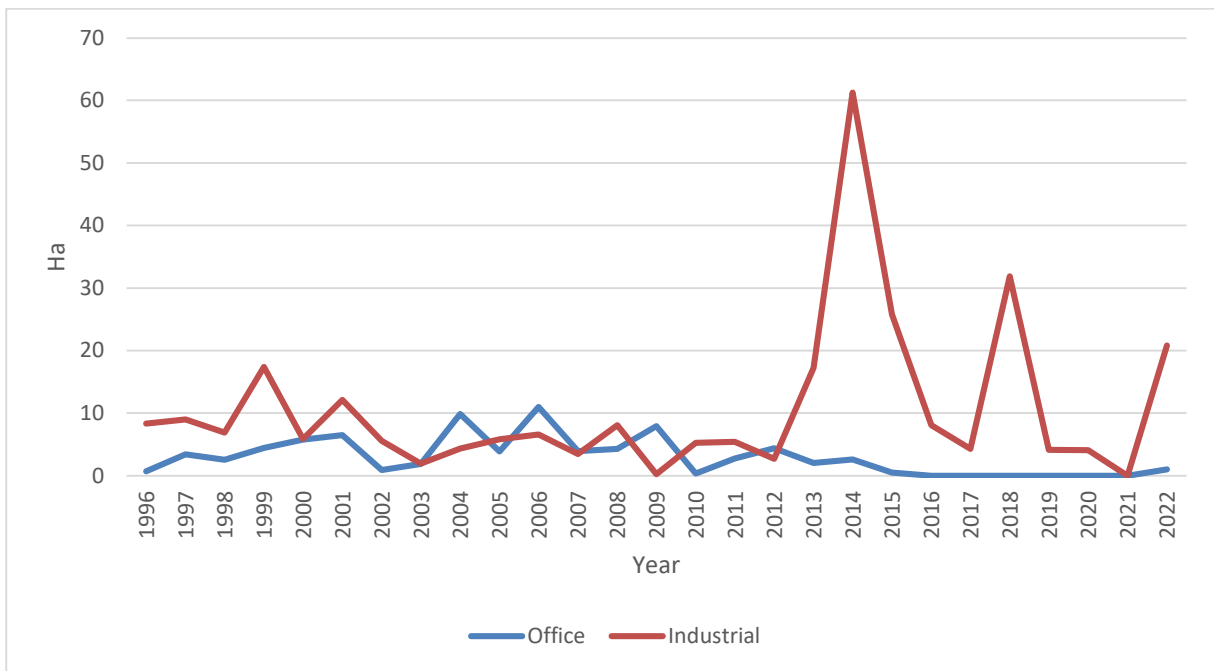


Fig 1: Historic take up by land type.

Source: 2021 EDNA table 21, industrial represents a merge of E(g)(iii), B2, B8, Mixed, and Warrington AMRs

3.7 For completeness the chart in Figure 2 below shows the land use breakdowns. This shows the dramatic increase and dominance of B8 from 2013 which reinforces that the past trends in land use within Warrington have changed dramatically from a balance between Office and Industrial to a dominance of logistics and virtually no Office component. Again, the three years monitoring data from 2018/19 have been added using Warrington AMRs with the focus on Mixed B and B8 Development.

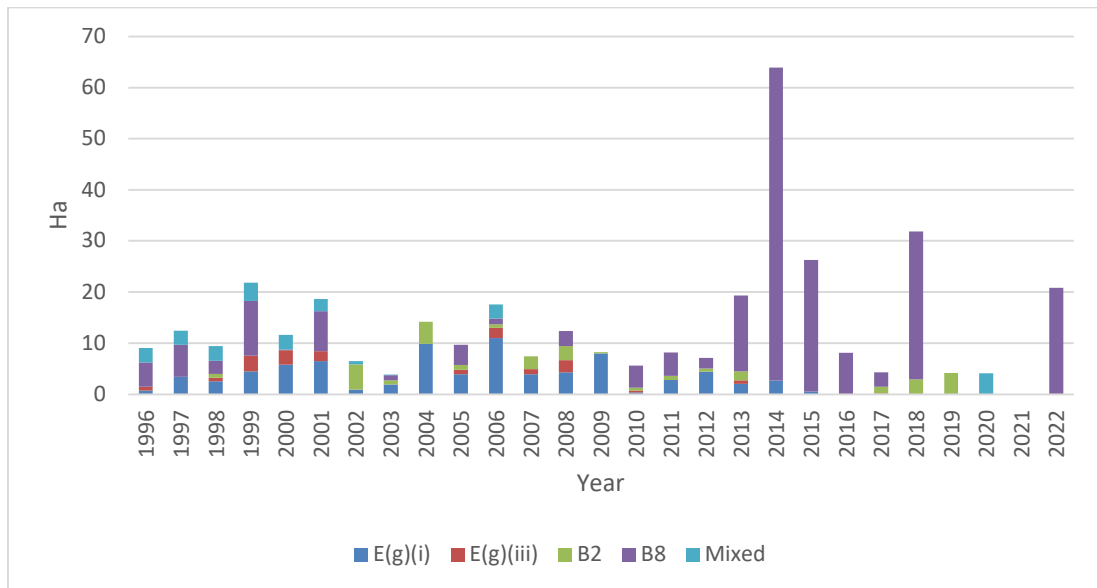


Fig 2: Historic take up by land use.

Source: 2021 EDNA table 21

2: The use of past take up trends to predict future requirements.

3.8 Here we consider the appropriateness of past take up trends to predict future requirements.

3.9 As stated in response to Issue 1 above, take up of past sectors is widely accepted as one of, if not the best, model in determining future land required (PPG para 027).

3.10 Other examples of the use of past trends include the evidence for the Greater Manchester Spatial Framework / Places for Everyone – see Employment Topic Paper July 2021 para 4.8 and 4.11 “Most employment land studies rely primarily on past take-up as the preferred approach to assessing future needs for Industrial and Warehousing land. Employment forecasting based approaches are generally not used, for the simple reason that such models tend to suggest low or even negative (net) need for employment land which is not a true reflection of actual need.”

<https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/05%20Places%20for%20Jobs/05.01.04%20Employment%20Topic%20Paper.pdf>

3.11 It is therefore considered that the take up of past land / floorspace, other than where there are supply side or viability constraints, provides one of the most definitive indicators of business needs. This therefore aligns with the 2021 EDNA for Warrington which comes to the same conclusion.

- 3.12** Furthermore, it is acknowledged that in the analysis of past trends it is helpful to consider different historic periods (this is commented on in response to Issue 4 below).
- 3.13** In the analysis of past trends it is also helpful to consider net and gross trends by sector – i.e. how much land is being lost as well as newly developed. This helps to understand the relationship between total jobs in the market, whether these are new jobs created for new space or whether these are moving the labour force into necessary new, better quality premises which may not affect total employment. This is particularly important and material in Warrington.
- 3.14** It is considered that the use of past trends should be triangulated against market signals – and other PPG methodologies. Market signals may alert to a deviation from past trends, which might include knowledge about certain sectors that need to be catered for, where floorspace demand is in decline such as in offices, or if supply side constraints have led to suppressed take up and future provision should increase (which low vacancy data might indicate).
- 3.15** For warehousing and industrial take up trends tend to be particularly useful as labour demand methodologies may be weak. Labour demand fails to take account of the need to replace older stock space. Labour demand forecasts can also be over reliant on national or historic trends and fail to pick up changes in market demand (such as changing trends in e-commerce). Therefore, it is considered that testing labour demand past trends vs forecasts is helpful.
- 3.16** Icenil consider that whilst labour supply is identified within NPPG it is rarely relied upon as a robust method of identifying an employment land requirement. Icenil conclude that labour supply modelling/ modelling business needs based on supply of labour, firstly risks constraining economic growth in areas where there is a supply demand imbalance (subject to commuting patterns) and is challenging given the lack of information about sectoral breakdown and the possibility of mismatches between supply and demand. Icenil note if labour supply is considered appropriate then it usually follows the same assumptions about labour demand whereby there is normally a need to include a replacement demand factor (see Liverpool City Region SHEMLA 2018, further discussed below).
- 3.17** Requirements derived from labour demand employment forecasts, and past take up are traditionally the most frequently used approaches, within established practice guidance.
- 3.18** Icenil based on their experience consider that past take up of Land and Property is the most reliable approach to identifying future needs. Icenil consider that this is due to the certainty of trend-based information. As stated earlier within our Main Modification representations Past Take up of Land and Property is commonly used, including recently at Wakefield Local Plan where Inspectors have concluded that the approach to the baseline requirement based on past take up was robust. This is also the case for St Helens Local Plan, and for Greater Manchester, see paragraph 4.25 and 4.26 for more information.
- 3.19** In Warrington’s Case Icenil highlight the conclusions from the EDNA (page 180) with respect to the use of employment forecasts, having regard to market evidence including stakeholder engagement “*from the market assessment and reviewing the historic trends in employment change and land take up, the conclusion is that the employment-based forecasts underestimate land need significantly. When a comparison of past employment change over the period 1996-2020 is made, actual land take-up is far higher than the estimate that even the growth only sectors*”

suggest. Finally, the locally based jobs targets cannot allow for the strategic growth potential of Omega and future strategic sites that will draw labour from outside of the Borough”.

- 3.20** On this basis BE Group concludes that: “It is considered that the most appropriate forecasts are based on the historic take up rates. The need to plan for strategic as well as local growth in the Borough favours the Strategic/Local Take Up model over the Local only forecast. This indicates a shortfall in Warrington’s employment land supply of employment land, equating to 277.39 ha to 2038. This is largely unchanged on the OANs put forward in the previous two studies 276-277 ha”.
- 3.21** Furthermore, the Council’s consultants have advised consistently through the EDNAs that the past take up is the most appropriate model for WBC having regard to the local context.
- 3.22** Therefore, IcenI confirm that in Warrington’s circumstances the past take up of employment Land and Property is the most reliable approach to identify future needs, given the certainty of trend based information, acknowledging that this can be constrained by past land supply policies or market failures.

3: Past trends in jobs growth in different sectors.

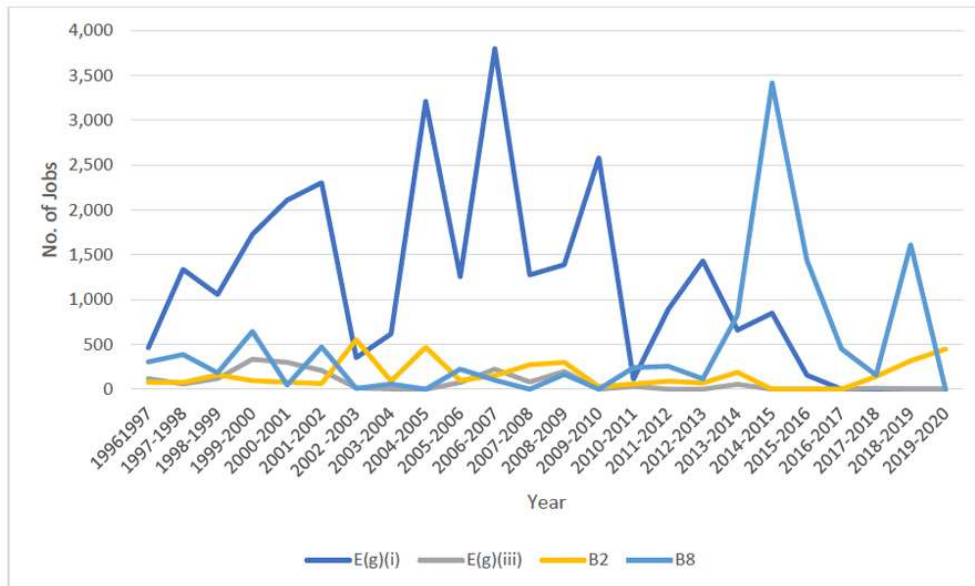
- 3.23** In considering past trends in jobs growth in different sectors, IcenI has drawn on Warrington historic data from Oxford Economic (as a paid subscriber to their local forecasting databank). Table 1 below therefore provides information on past trends in jobs growth in different sectors within Warrington. This begins to enable a better understanding of the relationship between land and jobs.
- 3.24** Of note, the last ten years has seen strong growth in B1 type jobs particularly Professional services but more limited actual delivery of space at circa 20 ha (see Table 21 in EDNA 2021). Looking only at net change in Finance, ICT and Professional services we see around 12,000 jobs growth or 600 jobs per hectare).
- 3.25** Meanwhile the transport and storage B8 jobs growth has seen a greater take up of actual space at around 153 ha gross (see Table 21 in EDNA 2021). In fact, in this period the simplistic ratio of B8 jobs (3,600) to space (153 ha) is only 24 jobs per hectare or if we assume half of the Wholesale jobs, (i.e. half of 2,400 plus the 3,600) we get to 38 jobs per hectare. This equates to 102 jobs per sqm at a 0.39 ratio.
- 3.26** These are ‘real’ recorded jobs and in IcenI’s view should be not attributed to physical developments. Analysis of land take alone should be viewed with caution when looking to correlate to job creation – due to a lack of analysis of other factors such as replacement demand (i.e. premises being delivered to replace new stock) or spaceless growth (in office related sectors). Other analysis and engagement can inform these issues including stakeholder discussions.

Sector	1999	2009	2019	1999-09 change	2009-19 change	Use Class
Accommodation and food service	7.21	7.29	7.76	0.08	0.47	Non B
Administrative and support	16.38	14.64	20.13	-1.74	5.49	Part B1
Agriculture, forestry and fishing	0.22	0.26	0.16	0.04	-0.1	Non B
Arts, entertainment and rec.	1.9	2.74	2.7	0.84	-0.04	Non B
Water supply	2.63	0.55	1.75	-2.08	1.2	Non B
Electricity, gas, steam and air	0.53	0.52	0.89	-0.01	0.37	Non B
Financial and insurance	1.78	2.54	1.95	0.76	-0.59	B1
Human health and social work	9.24	11.91	15.81	2.67	3.9	Non B
Information and communication	6.09	6.07	4.66	-0.02	-1.41	B1
Manufacturing - Total	11.22	7.79	7.24	-3.43	-0.55	B2
Mining and quarrying	0.11	0	0.04	-0.11	0.04	Non B
Transportation and storage	6.59	7.49	11.11	0.9	3.62	B8
Construction	9.72	11.02	11.15	1.3	0.13	Part B8
Other service activities	2.15	3.07	3.15	0.92	0.08	Non B
Education	6.49	7.66	6.84	1.17	-0.82	Non B
Professional, scientific and tech	9.4	12.07	26.03	2.67	13.96	B1
Public administration and defence	3.92	6.18	5.48	2.26	-0.7	Part B1
Real estate activities	0.89	3.24	1.83	2.35	-1.41	Non B
Wholesale and retail trade	22.85	20.86	23.29	-1.99	2.43	Part B8
Total	119.33	125.91	151.99	6.58	26.08	

Table 1: past trends in jobs ('000s) by sector for Warrington

Source : Oxford Economics, June 2023 (sourced by IcenI via local forecast databank subscription)

- 3.27** In addition to the above it is noted that Figure 1 in BE Group's response to the Inspectors Letter (CD 67), identifies Jobs generated, by year (for all years from 1996) and by 'Use Class', which is shown in Figure 3 below. This is developed using the HCA Employment Densities Guide densities (so not real world data).
- 3.28** BE Group go on to analyse the data and demonstrate that densities by individual Use Class should be applied rather than an all sector density (as per the Inspector's Note ID06) to avoid misrepresenting the overall relationship between jobs and floorspace change. CD67 demonstrates that the E(g) density is 183 jobs per Ha whilst B8 is 68 jobs per Ha (page 3 of CD67) compared with the ID06 position of 142 jobs per ha.
- 3.29** It is noteworthy that for the period up to 2012-2013 most jobs were generated by office development, and since 2014 most jobs have been generated by B8 Storage.



Source: WBC/BE Group, 2023

Figure 3: Jobs Generated by Year / Use Class (extracted from CD67, BE Group Figure 1)

3.30 Finally in Table 1 of the BE Group letter (CD67) past employment trends are apportioned by land use change. The problematic relationship between jobs change and land use change is immediately apparent from such a simplistic perspective, with negative jobs per hectare for manufacturing uses. This analysis leads to a confused and non-sensical picture with negative job densities. It is considered that any analysis should incorporate replacement demand and losses of space.

4: The appropriate time period to analyse past trends.

3.31 In the analysis of past trends, it is helpful to consider different historic periods. The late 1990s can be considered to represent a different era for floorspace demand compared with more recent decades.

3.32 Notable since the last 2008 recession generally the country has seen an increasing demand for industrial and warehouse space reflecting rising e-commerce activity, and a levelling off in the decline in manufacturing employment seen in the 1990s and 2000s. Most recently with the Covid-19 Pandemic we have seen the trend to working from home and a fall in office occupancy and a fall in demand for new build offices – a trend likely to remain. Overall, some temporal analysis of sectors is helpful and warranted.

3.33 The table below identifies the average take up by type for the 1996+ and the 2011+ periods showing the change in focus.

	E(g)(i)	E(g)(iii)	B2	B8	Mixed	Total
1996/97-2019/20 total	79.6	16.8	30.0	194.0	20.9	341.3
1996/97-2019/20 all average	3.3	0.7	1.2	8.1	0.9	14.2
2020/21-38/39 need projected	59.7	12.6	22.5	145.5	15.7	256.0
2011/12-2019/20 total	12.3	0.8	11.6	148.4	-	173.1
2011/12-2019/20 average	1.4	0.1	1.3	16.5	-	19.2
2020/21-38/39 need projected	24.5	1.6	23.1	296.8	-	346.1

Table 2: average historic take up by land use by period

Source: EDNA 2021 Table 21, IcenI analysis

- 3.34** It can be seen in projecting forward all take up from 2011/12 to 2019/20 for the period 2020/21 to 2038/39 would result in a demand for over 300 hectares. The component of Class E / B1 would be much smaller and B8 much bigger (whereas the B2 component would essentially be unchanged). Therefore, when starting to consider factors it leads to the indication that the demand for land is more, not less, than the EDNA 2021.
- 3.35** IcenI concludes that Warrington EDNA 2021 focus on past take up is a suitable approach. However, IcenI highlights that the NPPG emphasises the need to consider ‘recent’ patterns of take up and losses, for which a 20+ year period may be considered to be excessive, whilst having regard to the changing employment land requirements, and the drivers for employment land that are forecast to continue during the plan period.
- 3.36** IcenI maintain that it is appropriate to consider a more recent post 2011 trend since the financial crisis, the marked slowdown in the delivery of office space and the growth in B8 requirements. IcenI also highlight that the NPPG requires consideration of recent patterns of land take (note NPPG para 29 “consider recent employment land take-up”).
- 3.37** As highlighted within Langtree’s Main Modification representations, the IcenI evidence highlights that when having regards to trends over the 10 year period 2011 to 2019/2020, and continuing at this rate over the plan period, that this results in an even higher employment land requirement. This approach would be PPG compliant and have regard to the need to consider recent patterns of take up.

5: Job densities in different sectors.

- 3.38** In IcenI’s view the HCA Employment Densities Guide 2015 remains the most relevant source of density data. This demonstrates approximately a 70-95 sqm / FTE (full time equivalent) for warehousing, 36 sqm / FTE for industry and 8-13 sqm / FTE for offices.
- 3.39** For larger warehousing schemes with units typically over 100,000 sq. ft. or 9,300 sqm, 95 sqm per FTE is more common. This is assumed in reports such as ‘Warehousing and Logistics in

Leicester and Leicestershire¹ as well as the 'South East Midlands Warehousing and Logistics² Studies.

- 3.40** It should be highlighted that the FTE count is not the same as jobs, with some people working part time, the job count will always be slightly higher than the FTEs. FTEs can be approximated to jobs using BRES data on part time workers, which is a ratio of around 90% in Warrington(which means 1 job per 0.9 FTE's).
- 3.41** Where the Guide is out of date is regarding offices, post Covid-19 the work from home trend has disturbed this data and the future position is unclear. Generally, it is accepted that there will be an increase in levels of spaceless growth in the former B1a / Class E(g)(i) related sectors and not only spaceless but actual densities will be changing.
- 3.42** Notwithstanding the above, there are key issues with simply applying jobs growth to these density assumptions because:
- I. forecasts derived from national/regional shift share models are weaker at the local level, and do not fully reflect latest trends such as e-commerce.
 - II. that replacement of older stock is a significant factor that can drive the need for new premises without generating additional employment.
 - III. they do not account for improvements in investment and investment in productivity, which weaken the relationship between capital and labour, and therefore densities.
 - IV. assumptions on densities used are generic and can fail to reflect local trends.
- 3.43** In Warrington both factors (i) and (ii) are likely to be particular issues:
- 3.44** It is considered that (i) the local forecasts are an issue. This is apparent when comparing forecasts with past change and market signals. Analysing the 2021 EDNA Table 27 on Oxford Economics (OE) forecasts by sector, OE report growth in 400 jobs over the next 20 years in transport and storage. Whereas in the past ten years there have been over 3,600 jobs (see Table 1 above, Oxford Economics). Therefore, there is a significant disparity and these forecasts simply do not reflect the reality in Warrington. Once this is established the OE forecasts need to be viewed with extreme caution, especially as demand for transport and storage remains high. Icen's experience shows that work undertaken in a number of Local Plan Examinations in Public has required baseline forecasts to be adjusted to ensure they are more realistic for local areas (see Bassetlaw, Blackburn with Darwen etc). For Bassetlaw, a completion trend based model for employment was used with jobs figures derived from the supply capacity, using an appropriate displacement rate

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https://www.harborough.gov.uk/downloads/download/1457/warehousing_and_logistics_in_leicester_and_leicestershire_managing_growth_and_change_study_amended_march_2022

² <https://www.semlep.com/warehousing-and-logistics/>

factor (replacement demand)³. This jobs figure was used to determine the economic led housing need.

- 3.45** It is considered that (ii) replacement demand is a significant issue because of the difference in total land take versus actual floor space change after accounting for losses (as reported by the Valuation Office Agency). The VOA informs that actual industrial space change in Warrington (including B2/B8) has been 276,000 sq. m. or circa 70 ha between 2011/12 and 2019/20. Meanwhile the land take data has been 160.8 ha (EDNA 2021 table 21). This means that a significant quantum of losses has been occurring, whilst new space is delivered, putting downward pressure on total jobs change. This will continue in the future and is based on IcenI analysis of the age of industrial stock in Warrington and the need to replace it. Therefore, future changes in land take cannot be directly equated to total jobs change, nor can forecasts in jobs be directly attributed to total land need. Langtree’s Main Modifications representations (MMC086) examines this in more detail.
- 3.46** These issues reinforce the need to use market signals and past take up rather than ‘off the shelf’ jobs forecasts, and that other factors, discussed below, are required to balance jobs and floorspace.

6: Employment growth forecasts in different sectors, how this relates to “employment land” and “non-employment land” and the implications of this for the amount of land required to be allocated in the Local Plan.

- 3.47** There are always discrepancies in the interpretation of sector split for employment land and non-employment land between consultants. Nevertheless, whilst the BE Group approach taken in the EDNA 2021 (Table 29) may not be perfect (and somewhat simplistic), it is considered by IcenI to be reasonable. Issues that would warrant further consideration are that it may overstate the proportion of jobs in employment land in ICT and Financial & Business (which see increasing spaceless growth and it would be reasonable to apply a discount below the 100% BE Group position) and understate Distribution and Transport & Storage elements in employment land. Detailed examination of ONS data and fine grain consideration of the make-up of local economies can assist with this, which is considered beyond the scope of this statement.
- 3.48** However, the BE Group position is a reasonable starting point for this matter but as iterated in the 2021 EDNA and elsewhere is not necessarily the answer to the land needs. This is due to the degree of confidence that can be ascribed to employment growth forecasts as well as the need to apply other factors.

³ See post hearing letter at https://www.bassetlaw.gov.uk/media/7834/ins_10-post-hearing-note.pdf May 2023 and examination employment note at https://www.bassetlaw.gov.uk/media/7644/bdc-50_iceni-eip-employment-note-feb-22.pdf

- 3.49 As noted in the previous point, significant caution needs to be applied to the Oxford Economic forecasts. For the sake of completeness, the points above are reiterated.
- 3.50 Looking at the data EDNA table 27 on Oxford Economics (OE) and Cambridge Econometrics (CE) forecasts by sector, the OE / CE mid point of reported growth is 400 jobs in Transport and Storage over the next 20 years, as well as 500 jobs in Distribution (Iceni query the sector descriptions / composition here as Distribution seems to represent retail). However, over the past ten years alone there have been over 3,600 jobs in Transport & Storage (see Table 1). Given the market indicators of very strong demand in the sector, these OE / CE forecasts simply don't reflect the reality in Warrington. Once this is established the forecasts need to be viewed with extreme caution.
- 3.51 A key component, as considered in the previous question, missing from any labour demand based analysis is the need for replacement demand in addition to jobs growth. Many modern businesses cannot be expected to compete and grow in stock built in the 1980s and 1990s and the require sustainable premises with access to power to support automation, appropriate heights and scale and appropriately located on the access network. The government is seeking higher Energy Performance Certificates (EPCs) on commercial buildings in the future which much of the older stock simply won't meet. Therefore, we will be replacing stock without creating direct jobs – and we know this has been happening in Warrington when we look at the VOA records vs land take.
- 3.52 Iceni's experience shows that work undertaken in a number of Local Plan Examinations has required baseline forecasts to be adjusted to appear more realistic for local areas (see Bassetlaw, Blackburn with Darwen etc).
- 3.53 In Iceni's view it is more helpful to accept the land take based model for future employment needs, and then to understand what the implications of this level of supply are for jobs change using best practice economics guidance derived from the HM Treasury Green Book 2021 and HCA Additionality Guide 2014, taking into account issues around displacement and multiplier effects.
- 3.54 Iceni work these detailed steps through in Langtree's Main Modification representations (MMC086). This demonstrates that, once the replacement demand issue is accounted for, the growth in the land take based model can be accommodated alongside the Oxford Economics forecasts.

7: The relationship between the amount of employment land to be provided, the jobs growth that would occur and anticipated total labour supply (as a result of planned housing growth), taking account of the role of different sectors in employment growth and the differing needs for land to be allocated.

- 3.55 Iceni has provided detailed analysis of the relationship between employment land, jobs growth and labour supply in Langtree's Main Modifications Representation (MMC086). This is summarised as follows:

- Accept the Council's evidence in the 2021 EDNA regarding land need and the Council's response in the submission version Local Plan in terms of supply.
- Analyse the employment contribution of the supply using HM Treasury Green Book / HCA Additionality Guide best practice. This importantly includes a displacement assumption of 50%, as well a multiplier of 1.3. Displacement at 50% is 'medium' rate in the HCA Additionality Guide and broadly aligns with the 57% ratio of net to gross land change in Warrington 2011-2019, giving confidence of its appropriateness. The displacement rate is the same factor as 'replacement demand', any discussion of which has been missing in the evidence to date. However, this is a key issue included in, notably, the Liverpool City Region and Greater Manchester employment needs evidence.
- This process suggests that the future supply could generate around a net gain of 10,709 - 14,636 jobs depending on density assumptions and displacement rate.
- Using the OE forecasts in the 2021 EDNA and the land use apportionment applied in that document we find that the non employment land jobs are around 6,400.
- After deducting for some double counting, aggregating the total jobs results in a net total gain of 15,948 – 19,434 jobs. This range can be considered against the Local Housing Needs Assessment Update of 2021 (the LHNA) which estimates 18,300 additional jobs supported by the growth in labour supply. All of the jobs scenarios derived from the land supply plus labour demand, excluding the highest, fall within the labour supply based assessment. Given the number of assumptions required to reach these figures the employment outlook overall should be considered as well balanced, even if a greater number of jobs (such as in finance) are attributed to non employment land jobs.
- There are further factors that can be considered:
 - As of February 2023, there were 3,370 claimants in Warrington. It would be desirable to see more of these in employment. This reduces the demand on forecast growth in labour supply. From 2015-2020 the claimant count average was below 3,000 therefore this should be seen as achievable and desirable.
 - Many of these large proposed supply sites are on the edge of Warrington Borough which means they will attract a higher rate of in commuting than the Borough wide average, which would reduce pressure on the Warrington labour position.

3.56 Therefore, overall IcenI support the conclusions of the 2021 EDNA and have sought to illustrate how the proposed employment land supply can be supported by the labour supply, particularly by factoring in replacement demand. It has also been shown that the OE forecast effectively underestimate employment growth in the sectors that would occupy much of the land supply and should be viewed with extreme caution in isolation.

8: Specific evidence on the scale of land/floorspace required for storage and distribution uses (Class B8).

3.57 In planning 'need' terms, the historic take up of land over the last decade has been very much focused on B8 premises (see Table 3 above). A continuation of take up rates from the last ten years would result in even higher levels of land need than identified in the 2021 EDNA and Local Plan employment land supply. Market signals gathered in the 2021 EDNA very much reinforces

this demand position (see p31) “warehousing sector has not only been resilient during the pandemic but has arguably benefitted from it... In the North West, e-commerce/logistics was the dominant sector in the big shed market accounting for 95 percent of all take-up... Against demand, in the North West the supply of warehouse space has decreased dramatically in the last 12 months... this equates to just 1.07 years worth of supply in the region.”

3.58 The scale of need for strategic warehousing and logistics space was highlighted at the recent Call In Inquiries in the North West, with the Secretary of State confirming that “*there is clearly a pressing commercial need for new logistics floorspace at a local, Liverpool City Region (LCR) and North West level*”⁴.

3.59 Furthermore, the Proof of Evidence on Demand for Employment Land and Premises (Andrew Pexton, JLL) (Appendix 3 of Langtree’s Main Modifications Representations MMC086), and updated at Appendix 1, provides extensive information about the demand for premises across a number of geographies. This includes:

- Para 4.6 “Changes in the market have resulted in an increase in the need for warehouse space”.
- Para 4.10 “The national industrial and logistics market has had a strong performance in 2022. Nationally take up of Grade A accommodation was 3.011 m sq. m... higher than the five-year average of 2.778 m sq. m.”
- Para 4.20/21 “The North West market is an attractive location for the industrial and logistics sector... The effective market area is from Crewe in the south to Preston in the north, and from the west coast to the Pennines. The area includes the major conurbations of the North West and the principal motorway corridors.”

3.60 Overall, therefore Icen generally aligns with the EDNA 2021 position on the high level of demand for warehousing space.

9: Information on vacancy rates, rental values, net absorption, age of stock and redevelopment of sites and the implications of this.

3.61 The EDNA 2021 reports on rents (EDNA Figure 6) for industrial achieving around £8/psf. at 2020 with a steadily increasing trend historically other than for 2004.

3.62 However, Icen within Langtree’s Main Modification Representations (MMC086) provides more detailed and up to date information on rents, vacancy, net absorption and age of stock. This is summarised as:

- Rents rising to £9 psf. at 2022.

⁴ Paragraph 28, APP/H4315/V/20/3253194

- Vacancy at c5% in 2022 falling from 8% in 2019 and below 10% from 2016. Generally 5-10% is the optimum range and this indicates a tight operating market for industrial space in Warrington.
- Net absorption (total space occupied as established by lease deals / breaks) has been substantial and positive over the last decade. A continuation of this trend would see demand for some 220ha over the Plan period of which only 10 ha would be for offices.
- CoStar reports that 65% of all industrial floorspace is aged before 2000 and 48% is large unit floorspace. With demand for operators increasingly focused on higher quality units which are larger and have more power and higher eaves and hence more able to meet modern business demand for automation, replacement demand of stock is likely to be a significant driver (also see Liverpool City Region SHELMA para 12.7 for detailed discussion on need for replacement units and the inclusion of this factor as a major driver in the determination of the LCR land needs). Furthermore, the Greater Manchester Spatial Framework (Places for Everyone) evidence when comparing land take trends (completions) with labour demand includes a very significant replacement demand factor, see employment evidence for PfE 'Updated Note on Employment Land Needs for Greater Manchester 2021' table 1.1 ⁵).
- As noted previously, comparison of VOA and land take data demonstrates the issue of replacement space. The VOA tell us that actual industrial space change (including B2/B8) has been 276,000 sq. m. or c70 ha between 2011/12 and 2019/20. Meanwhile the land take data has been 160.8 ha (EDNA 2021 table 21). This means that a significant number of losses have been occurring whilst new space is delivered at a rate of 57%. Based on remaining stock age this will continue in the future.

- 3.63** The implication of replacing older stock is that existing employment essentially moves rather than creating new jobs. It is therefore appropriate and in line with Government Guidance on measuring net additionality to identify a displacement rate in line with local evidence.
- 3.64** Furthermore, importantly it should be noted that the EDNA reflects land take only and does not highlight the difference between greenfield or brownfield development or losses as well as gains. This is material to understanding the relationship between jobs growth and land take. Where sites are being redeveloped, there will not necessarily be a net gain in employment. Not accounting for this will result in a fundamental error in the calculation of jobs arising from employment land.
- 3.65** Icen highlight that net absorption models are increasingly considered to be an effective method in determining future needs for industrial space, as reflected in the BPF document 'levelling up of logistics', 2022 and a number of other logistics evidence-based studies, including 'Warehousing and Logistics in the South East Midlands' (Iceni / South East Midlands LEP, 2022).
- 3.66** BE Group have set out within the EDNA Addendum 2022 that they consider that net absorption will significantly overestimate the local need for new build premises due to incorporation of deals for second hand stock, leading to an overestimation in demand. However, Icen has

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<https://www.greatermanchester-ca.gov.uk/GMCAFiles/PfE/Supporting%20documents/05%20Places%20for%20Jobs/05.01.02%20Employment%20Land%20Needs%20in%20Greater%20Manchester.pdf>

demonstrated that this assumption is incorrect as the absorption is lower than the land take and it mischaracterises the demand for secondary or ‘cheaper’ stock which is about pricing and viability. When net absorption is positive, rents are rising and vacancy is sub optimal, it demonstrates that there is insufficient market space. IcenI conclude that net absorption provides a picture of total change in occupied stock and therefore the pressure on demand for additional stock.

10: The relationship of Warrington to other parts of the region/sub-region in terms of the market for employment land and in particular Class B8.

3.67 The Proof of Evidence on Demand for Employment Land and Premises (Andrew Pexton, JLL) (which is appended to Langtree’s Main Modification representations at Appendix 3 – MMC086) provides a helpful overview of the market for employment land. This includes:

- Para 4.22/23 “The North West market is an attractive location for the industrial and logistics sector... The effective market area is from Crewe in the south to Preston in the north, and from the west coast to the Pennines.
- Para 4.37 “The North West regional market can be defined [inter alia] along the main motorway corridors of M6 Crewe to Preston... there are more defined sub-regions/markets of M6, M62 and M60:
- M6 - This can be divided into ...
 - J19 – 21 Specific Warrington market/J20 – 25 The wider M6 corridor including Haydock, St. Helens and Wigan...
- M62 - This can be divided into...
 - J8 – J11 – the main Warrington and surrounding area market

3.68 Effectively motorway corridors and junctions provide the main market nodes. Some operators seek specific locations and others are more open about their regional location. Warrington is attractive given is labour market and connectivity. It is important that Warrington continues to play a role in providing land for business and especially logistics demand in conjunction with the other sub market locations.

3.69 BE Group at paragraph 6.18 of the EDNA 2021 note that Warrington competes with other locations along the M62, M6 and M56 corridors for larger industrial and logistics requirements, stating that with Omega, at the time, close to capacity, this market will drive future strategic developments within Warrington. BE Group and JLL are therefore in broad alignment with respect to the scale of the Warrington Market Area and in relation to industrial and logistics requirements.

3.70 Page 15 of Appendix 3, of Langtree’s Main Modification representations (MMC086) details the take up within each of the sub areas over the last five years. Within the Warrington Market, 14 units were constructed amounting to 411, 938 sq. m. This is a substantially higher number of units and floorspace constructed than any other submarket within the region. This demonstrates the popularity of the Warrington Market, within which SEWEA (and Six 56) is located.

- 3.71** With specific regards to strategic warehousing and the logistics market JLL identify the major sites/locations for such development over the last 10 years, which has included Omega, and M6 Major/North Florida Farm, both within the Warrington Market area as defined above. These have proven popular with M6 Major/Florida Farm being built out and occupied within three years following outline consent. Omega West benefits from consent for an additional 213, 777 sq. m. of floorspace, of which 157,156 sq. m. are already under construction. Outside of this sub market area, other major sites were Logistics North, Bolton (Lidl unit will complete the development) and Kingsway, Rochdale (all plots capable of accommodating a unit over 27,870 sq. m. have been built out). All four sites have excellent connectivity to Motorway Junctions.
- 3.72** JLL confirm that the Warrington Market has been popular and is regarded as a prime location, noting the development at Risley/Birchwood at J 11 of the M62 Motorway, the Grange at J21 of the M6 Motorway and Gemini at J8 of the M62, in addition to Omega. JLL note that Stretton has also been a popular location but that its expansion has been limited by Green Belt designation of the surrounding area.
- 3.73** JLL confirm that there is a strong market for logistics in the North West evidenced by take up. The Greater Warrington sub market has witnessed significant take up of 652,462 sq. m. since 2012, 63% of which was developed over the period 2018 to 2022, demonstrating the increasing demand from the logistics sector, and the popularity of the sub market area. JLL confirm that the Warrington Market Area has had 63% of the market take up from the wider market and they conclude that it is the most successful location (paragraph 14.7, Appendix 3 of Langtree' Main Modifications representations).
- 3.74** Appendix 3 of the Main Modifications representations, considers the supply of available sites, totalling 325,823 sq. m. in April 2023. Highlighting that when considering past take up that the North West distribution market has limited supply of buildings, 12-13 months' supply based on the average take up over 5/10 years. JLL further highlight the imbalance between supply and demand, noting that take up in 2022 was 537,907 sq. m, which is twice the ten year average, and significantly more than the available supply. Notably since JLL prepared Appendix 3, the supply has reduced further to 311, 981 sq. m following the letting of Magnitude 149, Middlewich to Jet 2 (JLL Update note Appendix 1).
- 3.75** Significantly, having regard to the fact 63% of the regions take up has been within the Warrington sub market, JLL's evidence demonstrates that there is only one building (Omega Loop) that is capable of accommodating units of 27,870 sq. m or more within the Warrington sub area, and only three buildings of more than 27,870 sq. m. available in the North West. **Furthermore, JLL note that there are no buildings over 9,292 sq. m. available, or under construction, in Warrington Borough Council administrative area.**
- 3.76** The Council's evidence contained within the EDNA 2021 also provides a market overview for both the North West and the warehouse market. While the EDNA reflects the position at 2020/2021 and the JLL evidence presents the position at 2023, **there is clear alignment between the evidence presented by BE Group and JLL on the regional and industrial/warehousing market.** BE group highlight that at the time the UK logistic markets witnessed a record year in 2020, and that logistics/e-commerce account for the majority of take up in the North West, with drivers of demand accelerating the growth of the sector. BE Group also note that the supply of warehouse space has decreased dramatically. BE Group's local market assessment also highlights that

industrial market activity has “held up and even improved during the Covid-19 Pandemic”. It notes that whilst there was a decline in the number of deals and total industrial floorspace transacted in 2016 and 2017, that was “felt to be a measure of the local lack of industrial floorspace, rather than evidence of a significant drop in demand”.

- 3.77** BE Group also review the supply available sites/premises, whilst this picture has moved on since the preparation of the EDNA, the EDNA highlights the limited availability of units over 9,292 sq. m, and at the time there was only a single unit available over 27,870 sq. m. BE Group noted that there was no availability of sites within the southern and eastern settlements of Stretton or Lymm. The stakeholder engagement confirmed the strong demand for industrial and logistics premises in Warrington, and whilst noting that enquiries were for a variety of sizes, strategic requirements for B2/B8 properties of 35,000 sq. m or more are noted.
- 3.78** Therefore, the provision of employment land within Warrington is critical in meeting the needs of Warrington itself and the wider region for the local, regional and national economy.

11: The regional/sub-regional picture in terms of the requirements for employment land overall and in particular Class B8.

- 3.79** It is recognised that B8 requirements for larger units can manifest across multiple authority boundaries. A number of the authorities surrounding Warrington have sought to work collectively to determine their Functional Economic Market Area (FEMA) requirements for logistics and the approach to meeting those needs. Most notably this means the Liverpool City Region authorities and the Greater Manchester authorities have been working collectively and effectively sit either side of Warrington. Since these two adjacent FEMA type areas have sought to identify and cater for their needs, Warrington needs to ensure that it can evidence its own need and supply.
- 3.80** The EDNA 2021 provides this evidence and more detailed information on these matters which are summarised and updated below.
- 3.81** The Greater Manchester Spatial Framework (now Places for Everyone / PfE) submission plan 2021 stated a target of at least 3.3 million sqm of industrial and warehousing floorspace to be delivered across Greater Manchester by 2037. Table on p72 demonstrates how that need will be met. It is of note that this is a reduction in the need from the 2020 version of the plan which reported 4.1m sqm of need. This reflects the removal of Stockport and also a move to a land take based model from the labour demand model, the latter including a very substantial replacement demand component (see employment topic paper table 1.1).
- 3.82** Liverpool City Region rely on the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA, 2018) which was published by the Liverpool City Region Combined Authority (LCRCA) and West Lancashire Council (and which is currently being updated by IcenI however no findings are available for publication at this time). As with PfE no attempt was made to disaggregate land need at authority level but rather a series of supply side assessment (areas of search) were made across the City Region to ensure sufficiency of supply.

- 3.83** In addition, Cheshire East have identified significant employment land needs which it will meet through its own allocations including Ma6nitude (formerly known as Midpoint 18).
- 3.84** Therefore, there is ongoing work within the region, at sub regional level including Liverpool City Region to establish the scale of employment need and in particular strategic employment need. BE Group, in the EDNA 2021, acknowledge that there are opportunities for Warrington that will arise from the growing Port of Liverpool. As identified within JLL's evidence there have been a number of Call-in inquiries within the North West. It is notable that the Secretary of State in granting the Parkside scheme in St Helens recognised that there is a critical shortage of land (IR 12.39). Indeed the five Call-in sites would only meet circa one-third of the identified need and therefore a substantial need still remains. The Inspectors Report for the Parkside site states at IR12.43 that there is clearly a pressing commercial need for new logistics and within the planning balance states that there is a demonstrable need and that the need for employment land has to be afforded very substantial weight (IR 12.170). The Secretary of State agrees with this position in supporting a strong competitive position, particularly with regards to the need for storage and distribution facilities
- 3.85** We therefore agree with the EDNA 2021 conclusions (para 6.131) that "*sites in neighbouring local authority areas, even when of a strategic scale, will ultimately meet the OAN of those authorities rather than Warrington.*"

12: The availability of sites in the region/sub-region (those with planning permission and those allocated in Local Plans), particularly those in locations competing with Warrington. The specific position regarding land at Omega West in St Helens

- 3.86** As set out in response to Question 10, the supply of sites, including those under construction, speculative builds, and existing buildings that are being marketed, within the region/sub region has been reviewed by JLL, which is attached at Appendix 3 of Langtree's Main Modifications representations (MMC086). JLL established that the supply of sites/buildings over 9,292 sq. m. across the region is 325,823 sq. m, noting that the North West distribution market has a limited supply of buildings providing 12-13 months supply, based on the average 5 and 10 year take up.
- 3.87** Since the preparation of Appendix 3 for the Call in Inquiry JLL have updated their information which is attached at Appendix 1 of this Hearing Statement. JLL consider that the supply of buildings has further reduced to 311,981 sq. m following the letting of Magnitude 149, in Middlewich. Significantly, there are only three buildings that are over 27,870 sq. m. that are immediately available within the region, and there are no buildings over 9,292 sq. m. available, or under construction within Warrington Borough Council. Only one building is available over 27,870 sq. m within the wider Warrington Market Area, which is at Omega. Langtree's response to the Main Modifications, JLL's reports (Appendix 3 and update), and the response to Questions 10 and 11 of this Hearing Statement confirms that there is continuing demand for logistics space, and that **the market is failing** with limited scale of available supply (12-13 months), and the timescales for obtaining planning consent and constructing units (15-24 months).

- 3.88** JLL analysed the supply within the Warrington Market Area and considered there is only a 2.5 year supply, based on the average take up over five years. JLL therefore consider there is a shortage of deliverable sites in North West and no sites available within Warrington Borough Council’s administrative area. JLL note that there is a severely restricted supply and future pipeline of buildings and that this is having an adverse impact on occupiers.
- 3.89** BE group examined the availability of the existing supply within the EDNA 2021, Section 4. Omega Phases 1 and 2 are listed as the only Strategic Employment Land sites within Warrington. It is noted that completion of this was anticipated within 1 year. Furthermore, BE Group also highlight that nearly two thirds of both the ‘Local’ and remaining ‘Strategic’ supply are anticipated to be developed within five years. BE Group go on to state *“the realistically available supply of Strategic B2/B8 has significantly declined since 2018, from 48.67 ha to just 12.7 ha. This reflects the speed of take up at Omega Warrington...”*. BE group concludes at 8.4 *“The north west reflects this high demand but lacks the supply to fully capitalise on this growth. Some sources suggest that against present property take up rates for strategic B2/B8 premises, the region has just over a years supply remaining. This is reflected in Warrington where only 12.7 ha remains at Omega and that will be taken up by 2022. Unsurprising given this limited supply, stakeholders are clear that the Borough needs further allocations. As in 2016 and 2019, where growth locations are mentioned, South East Warrington is put forward to take advantage of the key M56/M6 Links and provide strategic B2/B8 options. Fiddlers Ferry is also seen as a desirable B2/B8 option, but its distance from the motorways makes it of secondary interest compared to South East Warrington.”*
- 3.90** The evidence by JLL and BE Group, whilst they cover different periods, and geographies, point to a lack of supply of all types of existing sites, but specifically a lack of supply of strategic sites within Warrington.
- 3.91** Furthermore, examining the existing supply of sites, JLL (Appendix 3 of the Main Modifications Representations) and Spawforths through the Alternative Sites Assessment, have considered the availability of Sites within the wider region, specifically those that are within the Warrington Market Area, and therefore have the potential to compete with Sites located in Warrington.
- 3.92** Appendix 6 of JLL’s evidence (Appendix 3 of the Main Modifications Representations), identifies sites across the North West within the main motorway corridors that can accommodate a single unit of 9,292 sq. m. This establishes that 1,336,978 sq. m of sites with outline or detailed planning consent. This confirms that there are no sites within the administrative area of Warrington. It notes that there is one site with consent at Omega West, and highlights the limited availability of sites that are capable of accommodating larger requirements. Significantly, the analysis by JLL highlights that there are three consented sites within the Warrington Sub Market, Omega, Haydock and Parkside. Parkside is noted to be the main competing site within the Warrington Market Area, having regard to the take up rates it is estimated that Parkside would only provide 13.5 months supply for the Warrington Market Area. Together all the consented sites within the Warrington Market Area provide 411, 938 sq. m of floorspace, this only amounts to 2.87 years supply. JLL state that this does not offer a wide choice of sites. Two additional sites have been granted consent, these are located on the periphery at the northern extent of the M6 corridor at Three Sisters, Ince in Makerfield, Wigan, for 58,086 sq.m. and Martland Park, Wigan, for a single unit of 9,572 sq. m.

- 3.93** JLL conclude that the consented sites do not offer direct competition for sites such as Six 56 (SEWEA), as they cater for a different market in locational terms, clustered around Widnes, North Manchester, Crewe, Deeside, and Central Lancashire.
- 3.94** Section 11 of JLL's evidence (Appendix 3 of Langtree's Main Modifications Representations) discusses the seven Call In sites across the North West. This includes Parkside, Wingates Bolton, J25 Wigan, and Omega West in St Helen's. JLL highlight that at Omega West, 157,156 sq. m. (76%) of the consented floorspace has already been committed and is being developed, with pre-lets to TJ Morris and Iceland. The three other sites are all working towards offering plots in the next 12-24 months. JLL note that the timing of delivery reflects the complexity of these sites, and the timescale needed to deliver serviced sites rather than lack of demand.
- 3.95** It is noted that Parkside will only be able to deliver fixed plots and will not offer the wider variety of units sizes needed to satisfy demand in the Market Area. With the exception of Parkside and Omega, JLL considers that the remaining consented sites are too distant to be considered competition in the Warrington Market. It should be noted that all of these sites lie outside Warrington's administrative area. There is no agreement with the relevant authorities through duty to cooperate that these sites are capable of contributing towards meeting Warrington's identified needs for employment.
- 3.96** The Alternative Sites Assessment that accompanied the Planning Application for employment development at Six 56 and was subsequently updated to support the Six56 Call In Inquiry. It is appended to this Hearing Statement (Appendix 2). This provides further analysis of the availability, suitability and deliverability of sites within the Warrington Market Area, where these sites meet the minimum requirements for logistics development, namely proximity to the motorway network, good access to this via A roads, public transport connectivity and the ability to mitigate for sensitive uses where these are present. Fiddlers Ferry was not considered in the original ASA due to its secondary location, but has been considered within the Update due to the emerging Allocation. The sites considered are detailed at Table 1 and Appendix 1 of the ASA, and Table 2, Appendix 2, which include Omega West (75.22 ha) encompassing the land beyond the allocation EA1 in St Helens Local Plan.
- 3.97** The ASA reviews the evidence within the Council's EDNA 2021 with respect to Fiddlers Ferry, which grades the site as A-/B- noting that the site has good A road access but that its distance from the M62 Motorway makes it less desirable to logistic occupiers than other locations, which have direct motorway access. The EDNA also notes that given the constraints on demand and the time it could take to fully decommission and clear the power station, that it is unlikely the employment site will be fully developed by 2030. The ASA notes that the first phase of development at Fiddlers Ferry was anticipated by September 2026, with an anticipated submission of an application in 2022, which was formally submitted in 2023.
- 3.98** Furthermore, Model Logic (Appended to Appendix 3 of the Main Modifications Representations) compare the comparator sites to Six 56, including Fiddlers Ferry, having regard to operator requirements and catchment considerations. Model Logic demonstrate that an Employment Supply in Warrington, based on Fiddlers Ferry alone, would not be capable of meeting the identified needs for large scale logistics, based on operator requirements. This would be contrary to national policy, NPPF, para 83.

- 3.99** With specific regards to **Omega West**, the ASA, as with JLL's evidence notes that three of the four units are under construction, with named end users expected to be occupied during 2023. These are committed and are no longer available. The ASA notes that the fourth unit is subject to a Reserved Matters submission, and is being actively marketed, with some enabling works to facilitate the development underway. The JLL evidence highlights the active enquiries within the Warrington M6 Market and they are clear that these enquiries cannot be satisfied by Omega West alone.
- 3.100** It is noted that Omega West lies within St Helens and that there is agreement between St Helens and Warrington Councils that 31.22 ha of the Omega West site can contribute towards meeting Warrington's needs. This has been well documented throughout the development of the emerging Local Plan and at the Examination in Public.
- 3.101** St Helens Reg 19 Response as recorded in SP13 Representations Log: "*The identification of Site 1EA (in St Helens Local Plan) to assist in Meeting Warrington's needs is supported and aligns with the St Helens Borough Local Plan Submission Draft. However, table 6 states 31.80 ha for the site but it is 31.22 ha in the St Helens Local Plan. Whilst agreement has been reached, as set out above, that the 31.22 ha of site 1EA will contribute to meeting the identified employment needs of Warrington Borough, there has been no agreement reached with respect to the additional area now permitted by St Helens Council reference p/2020/0061/HYBR and Planning Inspectorate Reference APP/H4315/N.20/3265899_ for a larger 75 ha site*"
- 3.102** Paragraph 2.2 of the Statement of Common Ground – September 2021 notes that the Local Plan does identify a proposed allocation site in St Helens which would contribute to meeting Warrington's employment needs and could impact on key highways infrastructure in Warrington's administrative boundary.
- 3.103** Paragraph 4.11 states that WBC has agreed with St Helens in principle that the westward extension of Omega (identified as proposed site allocation 1 EA in the emerging new St Helens Borough Local Plan will contribute to meeting Warrington's employment land needs, subject to resolving access issues.
- 3.104** Paragraph 4.12 noted that additional employment land may come forward at Omega West, subject to the outcome of the Secretary of State's decision in respect of St Helens' resolution to grant permission for a 75 ha development.
- 3.105** The latest position is presented in CD48 St Helens Council re Omega West, 17th October 2022.
"St Helens Borough Council will not be in a position to make a decision on Omega West with respect to Duty to Cooperate, beyond that already formally agreed as part of the St Helens Borough Local Plan until such time as the SDS and its supporting evidence base is further advanced. At this point in time, it is not known whether this will fall within the timescales of the Warrington Local Plan Examination"
- 3.106** In summary there is no agreement that the additional land at Omega West can contribute towards meeting Warrington's employment land needs. The SDS referred to is the Liverpool Spatial Development Strategy which is still at its early stages of preparation with no confirmed dates for the next stage of consultation which would relate to a preferred approach to spatial development.

In the absence of such an agreement we consider that it would be inappropriate to rely upon the wider site area of Omega West to meet Warrington's employment needs.

3.107 In addition to Fiddlers Ferry which will be delivered in phases and is not suitable for strategic B8 uses, Omega West cannot meet all of the identified employment land needs for Warrington. There are a limited number of other sites within the wider Warrington Market area that are suitable and deliverable and they too cannot meet all the employment land needs for the Warrington Market area. Therefore, there is an evidenced need for employment land demonstrated within the EDNA, the Icen Report and a demonstratable shortage of strategic sites as shown in the JLL and Spawforth evidence supported by the EDNA, in suitable locations capable of meeting that need.

Proposed Change

3.108 To overcome the soundness matters Langtree proposes the following changes:

- Remove the Main Modifications related to the employment land requirement and SEWEA (in particular MM002, MM003, MM005, MM007, MM024 and MM031) and reinstate the Local Plan employment land requirement as set out in the Submitted version.
- Reinstate the South East Warrington employment area (SEWEA) employment allocation - Policy MD6.



Appendix 1: JLL Update

Six 56 Site/ Employment Market Update

Grade A Building Supply

My proof of evidence refers to there being 18 buildings either available or under construction. This has been reduced by one unit (Magnitude 149, Middlewich) which was under offer in my proof and has now been let to Jet 2.

The reduced supply is shown next to my table in my proof at 7.3

Type	No. of Units April 2023		No. of Units June 2023	
Units under construction	7	117,642 sq. m.	7	117,642 sq. m.
New speculative build	6	150,013 sq. m.	5	136,171 sq. m.
Existing Grade A units	5	58,168 sq. m	5	58,168 sq. m
Total	18	325,823 sq. m	17	311,981 sq. m

Sites with Planning Consent – Outline or detail over 9,292 sq m (100,000 sq ft)

I list the sites we are aware of that have been granted planning permission and apologise for missing two sites off the schedule that was submitted in my evidence listed as Addendum sites

Property/Site	Authority	Unit Size (sq. m)	
Former Cammell Laird, Campbelltown Road, Birkenhead	Wirral	46,040 sq m	Single unit with detailed consent
Vortex BP, Bridge Rd, Ellesmere Port	Cheshire West & Chester	9,944 sq m	Multi unit scheme totalling 19,516 sq m. A single unit of 9,944 sq m is planned. Detailed consent granted.
Chemie Pelzer Site, Speke Hall Ave Speke	Liverpool City Council	18,584 sq m	Planning granted for 18,584 sq m single unit.
Three Sisters, Ince in Makerfield, Wigan	Wigan	15,892 sq m	A larger development of 58,086 sq m consisting of mid box and multi let units has been granted an OPP. The layout/scale plan shows a single unit of 15,892 sq m
Martland Park, Wigan	Wigan	9,572 sq m	Outline consent granted for a single unit
Addendum Sites			
X Dock 545, Gorsey Lane, Widnes	Halton	50,650 sq m	Single unit with planning consent
Winsford Gateway	Cheshire West and Chester	23,234 sq m	Planned as a several unit scheme but could build up to 23,224 sq m in a single unit

Other sites that have come to the Market

I am not aware of any additional sites that have come to the market, the Shearings/Custom site at Stretton will be marketed by Cushman & Wakefield later this year – the site is 2.95 ha and is irregular in shape but could fit a unit of c 9,292 sq m to 13,940 sq m.

See old aerial photo below





Appendix 2: Alternative Site Assessment

Langtree PP & Panattoni

Six 56 Warrington

DR05 - Alternative Sites Assessment

Update Statement

Revision C 6 April 2023



Report Date	6 April 2023
Project No.	4055
Document Ref.	P4055-SPA-RP-TP-0035
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Appendix 2 – Summary Tables

I. Introduction

- I.1.** This is an Update Alternative Sites Assessment (update ASA) to the original Alternative Sites Assessment (original ASA) (CD4.101) and is produced to support David Rolinson’s Planning Evidence for the Call-in Inquiry. This relates to the Outline Planning Application (OPA) for a strategic employment development on land adjacent to Junction 20 of the M6 Motorway and Junction 9 of the M56 Motorway (known as Six 56 Warrington).
- I.2.** The original ASA (CD4.101) was produced to consider whether there were potential alternative sites that could accommodate the Application proposal in whole or part. During the course of Warrington Council’s consideration of the OPA, updated details associated with the original ASA (2018) were provided in the Replacement Planning Statement (October 2021) (CD4.34). Given the time that has lapsed since the production of the original ASA (2018), and the Replacement Planning Statement (2021), this Update ASA has been produced to consider any changes in circumstances that may affect the conclusions of the original ASA (2018).
- I.3.** This update ASA should therefore be read in conjunction with the original ASA (2018) (CD4.101) and the Replacement Planning Statement (October 2021) (CD4.34). It has been prepared to review the following matters:

 - Whether the status or circumstances of any of the sites previously assessed has changed over the time that has lapsed;
 - Whether there are any new sites that need to be included in the update ASA.
- I.4.** This update ASA is undertaken in the context that the emerging Local Plan (Updated Proposed Submission Version Local Plan (UPSVL) 2021–2038)

(CD3.1) identified three strategic sites for employment allocation – the South East Warrington Employment Area (SEWEA) (which includes the Application Site - Six56), Fiddlers Ferry and Omega West (See **Appendix I** for site location plan). The SEWEA (including the Application Site - Six 56) and Omega West are within the Green Belt. The employment development at Fiddlers Ferry is previously developed non-Green Belt land, however it requires new residential development within the Green Belt to cross fund / enable the delivery of this employment development, due to the costs of bringing forward a former power station for redevelopment.

- I.5. The Application proposals were considered in the context of the emerging Local Plan which has identified the Application Site as part of a draft employment allocation (SEWEA) to be removed from Green Belt. The emerging Local Plan evidence base includes the Warrington Green Belt Review in 2021 (CD4.99), the Warrington Economic Development Needs Assessment (EDNA August 2021) (CD4.93), along with further site-specific documents. This Update ASA therefore has had regard to the approach taken in these documents.

2. Methodology

Approach

- 2.1. The original ASA (2018) considered the potential for alternative sites to accommodate a new logistics park to meet the employment needs of Warrington. This update ASA Statement utilises the same methodology as the original ASA (2018), which includes the scope for disaggregation, area of study, consideration of potential sites and the three-stage assessment of sites (see original ASA (2018) CD4.101 for the full methodology).
- 2.2. The summary table at **Appendix 2** provides a full summary of the current position of the sites considered within the original ASA (2018) to confirm any changes in circumstances.
- 2.3. One new site - Omega West (located within St Helens' authority area) has been identified for consideration, given its proposed allocation for strategic employment in the emerging local plan.
- 2.4. The assessment for the original ASA (2018) takes a series of stages.
- 2.5. **Stage I** is to establish whether the identified sites meet the minimum requirements for logistics development, namely proximity to the motorway network, good access to this via A roads, public transport connectivity and ability to mitigate for sensitive uses where these are present. This is not considered to have changed in the time that has passed since the production of the original ASA (2018) and as such is not reassessed in this update ASA. Fiddlers Ferry was dismissed at this stage of the original ASA (2018) assessment due to its secondary location for logistics but further consideration is given to this site within this updated ASA as it is a proposed employment allocation within the emerging Local Plan. This is set out within Section 3 of

this Update ASA Statement and incorporates details from the Replacement Planning Statement produced in 2021.

- 2.6. **Stage 2** then considers a range of additional factors to establish the suitability of a site for logistics development such as site shape and proximity to workforce. These factors are not considered to have changed in the time that has passed since the production of the original ASA (2018) and as such are not reassessed in this update ASA.
- 2.7. **Stage 3** then assessed the remaining sites and considered the approach taken by the emerging Local Plan and Green Belt Assessment (2016 and 2017). The Stage 3 Green Belt Assessment has therefore been reviewed as part of this update ASA to ascertain whether the updated Green Belt Assessment (2021) that form the basis of the local plan evidence base have any effect on the assessment and conclusions derived in the original ASA (2018). The status of each of the sites have also been reviewed and any relevant updates provided.

3. Assessment

Identification of Stages

3.1. In line with the above methodology, a total of 9 sites had been identified in the original ASA (2018) (CD4.101), of which 7 progressed to Stage 2 of the Assessment and also to Stage 3 of the Assessment. The 9 sites are set out in the table below, and a Plan showing the location of all the sites is included at

Appendix I:

Site Ref	Site Address	Size (Ha)
1.	Omega North Extension.	13.5 ha
2.	Burtonwood Brewery & White House Farm	4.22 ha
3.	Port Warrington	74.19 ha
4.	Land North of Barley Castle Lane, Appleton (Stobart's proposed NDC site)	15.3 ha
5.	Land at Barley Castle Farm. (8.69 ha) Land at E end of Barleycastle Lane (North Parcel). Land at E end of Barleycastle Lane (South Parcel). *These sites are considered as one consistent with the emerging Local Plan	19.64 ha
6.	Land South of Barley Castle Lane Land at Barley Castle Lane (0.5 ha) *These sites are considered as one consistent with the emerging Local Plan	9.97 ha
7.	Omega South Plot 7E (Mount Park) / Omega South Plot 7F (Mount Park) Comprising: Unit 2 136,963 ft ² (completed Dec 2018) Unit 3 90,771 ft ² (completed Dec 2018) Unit 4 183,669 ft ² (to be completed by Feb 2019)	18.27 ha
8.	Omega South Zone 1B	17.99 ha
9.	Fiddlers Ferry Power Station *includes main power station, ash lagoons, rail sidings, pump house and agricultural land	330 ha
10.	Six 56, Warrington (the Application Site)	96 ha

Table 1: Location of Sites

- 3.2. The summary table at **Appendix 2** provides a full summary of the current status of the sites taken to the Stage 3 assessment (i.e. sites 1, 4 5, 6, 7, 8 and 10).
- 3.3. In addition, **Appendix 2** considers Omega West in detail as the only new sites to be considered. This site is identified in the table below and shown on the plan at **Appendix 1** as site 11:

Site Ref	Site Address	Size (Ha)
11.	Omega West	75.22 ha

Table 2: Location of New Site

- 3.4. This assessment concludes that three of the four units are under construction with named end users expected to be occupied during 2023. These are therefore already “committed” and no longer available as a comparative site to the Application proposal. The fourth unit is the subject of a reserved matters application by St Helens Council, with marketing material suggesting this is available for construction in Q3 2023. A brook diversion required to facilitate the delivery of this unit is already in construction. Individually this unit would not be able to accommodate the full amount of employment development proposed at the Application proposals and as such is not a comparable site.

Stage 1 and 2 Assessment

- 3.5. As detailed within Section 2: Methodology, the assessment of Stages 1 and 2 for sites included within the original ASA (2018) have not been revisited, and as such the assessment within paragraphs 3.6 to 3.8 of the original ASA (2018)

remains relevant to the assessment of alternative sites. This is with the exception of Fiddlers Ferry which is given further consideration below, due to its proposed allocation as a strategic employment site within the emerging local plan.

Fiddlers Ferry

- 3.6. The current Fiddlers Ferry Power Station is identified within the Warrington Core Strategy (Adopted July 2014) as Policy PV2: Fiddlers Ferry (CD2.1). The main Fiddlers Ferry Power Station site is not within the Green Belt, however, the policy specifies that any additional land required within the Green Belt would be considered against national Green Belt policy.
- 3.7. The site at the former Fiddlers Ferry Power Station is allocated in the emerging Warrington Local Plan 2021-2038 as a mixed use employment and housing site through Policy MD3.1 (CD3.1). The site is anticipated to deliver 101ha of employment land and a minimum of 1,310 homes.
- 3.8. Policy MD3.1 identifies that 82ha of land from the Green Belt will be removed to accommodate the new housing areas of the site. The additional land for residential use is justified to facilitate the redevelopment of the Fiddlers Ferry Power Station site for employment. The Statement of Common Ground between Warrington Borough Council and Peel L&P (Holdings) UK Ltd (SG02: August 2022) (CD4.134) states in paragraph 3.21:

“Phase I – Full Scheme Appraisal: Commercial Only (Appendix 3): This appraisal is based on assessing the full quantum of commercial development which is proposed to come forward on Phase I of the development area (land to the north of the railway line), but excludes the proposed residential development on the agricultural

land. This appraisal retains the same demolition, remediation, commercial abnormal costs and strategic infrastructure cost assumptions as the full phase appraisal other than the residential S106 contributions which are excluded. This appraisal demonstrates that the commercial development alone is not sufficiently viable to cross-subsidise the upfront demolition and remediation costs, as the residual land value – whilst still comfortably positive at c. £22m – does not exceed the BLV. This appraisal therefore demonstrates that the residential element of the scheme is required to generate the additional upfront surplus to cross-subsidise the demolition and remediation costs early in the development period.

- 3.9. This demonstrates and confirms that part of the ‘*exceptional circumstances*’ for the residential element of the scheme is to cross subsidise the employment part of the scheme for viability reasons. It also confirms that this residential element is required “to generate upfront surplus.” to cross-subsidise the demolition and remediation costs. This demonstrates that the value from the residential development which lies within the Green Belt is required to fund the demolition and remediation. This will have implications upon the delivery of the employment element of the site.
- 3.10. The Local Plan Green Belt Assessment (August 2021) (CD4.99) highlights that the northern section of the site makes a ‘*strong*’ contribution to Green Belt ‘*purposes*’ and the southern section makes a ‘*moderate*’ contribution to Green Belt ‘*purposes*’.
- 3.11. The Warrington Economic Development Needs Assessment (EDNA, August 2021) (CD4.93) states in Table 14 (page 99):

“Located some five miles from the M62, Fiddlers Ferry would struggle to compete for major requirements with nearby locations which enjoy direct motorway access, including Six56, a western expansion of Omega and other schemes proposed in St Helens.

It is likely that the employment uses will be dependent on the housing to provide an element of cross funding, particularly to support the large site clearance and remediation costs. Thus regardless of the stated masterplan timetable, it is likely that at least some of the housing will need to be developed before the employment and that the wider scheme will not be viable without a certain quantum of housing. As the housing is to be developed on Green Belt, releasing the Green Belt will likely be key to delivery of the brownfield land.”

3.12. In relation to deliverability the EDNA considers that

“the site has good A-Road access but its distance from the M62 makes it less desirable to major logistic occupiers than other locations which enjoy direct motorway access. This weaker position will likely have some impacts on the speed at which B2/B8 options are taken up but may mean that demand from local firms outweighs demand from strategic businesses. Given the constraints on demand and the time could take to fully decommission and clear the power station, it is unlikely the employment site will be fully developed by 2030, as stated in master planning”.

3.13. The EDNA therefore grades Fiddlers Ferry as A-/B-, which is a constrained site with a range of constraints needing to be addressed, which is alongside a number of sites sitting in fourth place in relation to ranking of sites in the EDNA.

- 3.14. Local Plan reference CD31 (CD4.135) is an updated note on the masterplan delivery programme. This shows demolition of the power station through to December 2026 with the employment coming forward in three phases with the first phase being delivered by September 2026, assuming a planning application is submitted in the autumn of 2022. However, at present according to the Public Access System, no planning application has been submitted for redevelopment. A Screening Opinion was however sought in 2021 for the demolition of the power station buildings and a subsequent application submitted in September 2022 for the demolition, which is pending a decision. The consultation for the Development Framework for the site in autumn 2022 shows the first phase comprising four units totalling 1.35 million sq. ft. The developers website shows that consultation on Phase I closed in December 2022.
- 3.15. The programme assumes that each phase will come forward in a staged manner roughly two years apart with the third phase complete by March 2030.
- 3.16. The delivery programme assumes that planning permission for the northern parcel is granted by June 2024 and therefore that it commences delivery from July 2025 to July 2030. Given this application is yet to be submitted, it is reasonable to expect that these timescales will be delayed. Similarly no residential application has been submitted to allow the cross enabling of the residential to fund the demolition and remediation for the employment scheme.
- 3.17. The EDNA (CD4.93) confirms in Table 14 (page 99) that:-

“It is noted that full decommissioning and clearance of the power station could take up to seven years from an approx. start date of spring 2020, based on experience elsewhere. Thus, to meet the

identified timetable it is assumed employment land will come forward on a phased basis, with the 56 ha Power Station Site possibly not fully available till 2027. If that proves the case, the masterplan assumption that the full completion of the employment land will occur by 2030 seems very ambitious, with completion in the 2030s more likely".

- 3.18. The residential element of the site lies in the Green Belt and hence will require the completion of the Warrington Local Plan process to secure its allocation prior to the grant of planning permission for it. Funding from this element is required for demolition and remediation of the employment land and hence this is a precursor to delivery of the employment land. The timescales for delivery of the employment land set out in the EDNA (completion in the 2030s) therefore may be optimistic.

Stage 3: Assessment Against Green Belt Purposes

- 3.19. As shown in **Appendix 2, Table 1**, Omega North, Omega South and Omega South IB are no longer available due to having secured planning permission and either being developed out and occupied, or in the final stages of construction. As such, they have not been reconsidered through the Stage 3 Assessment as they are “committed” development rather than potential alternative sites to the Application proposal.
- 3.20. The additional new site to be considered through this Update ASA is Omega West. As shown in **Appendix 2, Table 2**, this site has three of the four units under construction (unit 1, 2 and 3) with known end users and these units are therefore already “committed” and no longer available as a comparative site to the Application proposal. The fourth unit (unit 4) is currently being marketed as a unit of up to 417,144sqft (38,755sqm) being available for development from Q3 2023, with a reserved matters submission currently under

consideration by St Helens Council. Furthermore, construction is underway for a brook diversion required to enable the construction of unit 4. However, this is a single unit and could not accommodate the full amount of development proposed at the Application proposal and as such is not considered further. The Plan extract below shows the units:



Figure I: Omega West (extract from Omega Masterplan)

3.21. The remaining four sites have however been reconsidered against the criteria identified in Stage 3 of the methodology, taking account of the updated Green Belt Sites Selection Report (August 2021) and scored as follows:

Site Address		Green Belt Purpose					Score
		1	2	3	4	5	
1	Omega North						N/A
4	Land at Barley Castle Lane	Yellow	Green	Yellow	Green	Red	Yellow
5	Land South of Barley Castle Farm.	Red	Green	Yellow	Green	Red	Yellow
6	Land South of Barley Castle Lane	Green	Green	Yellow	Green	Red	Yellow
7	Omega South						N/A
8	Omega South Zone 1B						N/A
10	Six 56 Warrington	Yellow	Green	Yellow	Green	Red	Yellow

Table 3: Stage 3 Assessment

3.22. The results of Stage 3 indicate that of the four sites that were taken through to this stage for re-assessment, all of them scored sufficiently to be taken forward to a further level of scrutiny (all scored amber or neutral). It is therefore considered worthwhile considering these sites in more detail against the Warrington EDNA (2021) (CD4.93) and Green Belt Review (2021) (CD4.99). Whilst NPPF (21) has been updated since the original ASA, it still states that (planning) decisions should help create the conditions in which businesses can invest, expand and adapt and goes on to say significant weight should be placed on the need to support economic growth and productivity, taking into account of local business needs and wider opportunities for development (para 81). Importantly paragraph 83 is explicit that planning decisions should “recognise and address the specific locational requirements of

different sectors which includes... storage and distribution operations at a variety of scales and in suitably accessible locations.”

- 3.23. The EDNA (2021) (CD4.93) recognises the part Covid-19 has had in the growth of e-commerce, which already had a strong logistics market, with record take up for B8 in 2020, 95% of which was in the big shed market. However it does note that the North West lacks the supply of sites to fully capitalise on the growth.
- 3.24. The EDNA identifies the Application Site (Six56) as A+ grade as it considered the site to have limited constraints and could be made available almost immediately, subject to planning. This is the only site that receives this ranking within the EDNA and is identified as Option One for an employment site in the EDNA recommendations.
- 3.25. If the Secretary of State grants planning permission for the Application proposal towards the end of 2023, reserved matters applications and condition discharges could be progressing during 2024 to allow enabling works to commence at the end of 2024. This would facilitate delivery of the employment units between 2025 and 2031.
- 3.26. As set out within the original ASA (2018), Sites 4, 5 and 6 (Barley Castle) do not benefit from immediate access to the motorway and therefore would be considered a secondary location in this respect. However these sites can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive SEWEA proposal. The Barleycastle sites (which are considered as six sites within the EDNA), are graded as A+/B+ or B+ within the EDNA. They are considered

to be relatively unconstrained and could be brought forward immediately, subject to planning. But these sites, either individually or as a whole, could not accommodate the full amount of development proposed at Application proposal. These sites are identified as Option Two in the EDNA recommendations.

- 3.27. The updated Green Belt Assessment (2021) (CD4.99) confirms that the removal of the SEWEA will not harm the overall function and integrity of the Green Belt in the area and is suitable for release to meet the critical need for employment land in the area. It states:

“The sites which comprise this allocation made a weak, moderate and strong contribution to Green Belt purposes. Development of this allocation would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it would be reasonably contained and well defined along strong permanent boundaries to the north, east and south (the M6, M56 and the B5356). The remaining surrounding Green Belt could continue to perform its Green Belt function. The removal of this site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the north, east and south by the B5356, M6, and M56 respectively.”

- 3.28. As noted within the Council’s Green Belt Assessment the new Green Belt boundary is along strong defined long term and permanent boundaries, in accordance with national policy and guidance. The SEWEA is therefore a suitable site to be released to meet the critical need for employment land in the area.

- 3.29. The EDNA confirms that the available land at Omega could be taken up within one year. The Omega West draft allocation site comprises 31.22ha which although in St Helens, has been agreed to count towards Warrington's employment needs. The remaining 44ha is in the Green Belt and is not however currently accounted for in either Warrington or St Helens' requirements.
- 3.30. In conclusion, the Application Site is the highest ranked site in the EDNA (CD4.93) in terms of meeting market needs and delivery. It can therefore meet the short and medium term employment (especially logistics) requirements. The Omega South and Omega South Zone 1B are built out and occupied, so "committed". The Omega West site has three out of the four units under construction and therefore these are already "committed" and is no longer available as a comparative site to the Application proposal. The fourth unit is currently being marketed as being available for development in Q3 2023, with a reserved matters submission under consideration by St Helens Council and a brook diversion to facilitate the unit under construction. However, individually, this site would not accommodate the Application proposals. The Fiddlers Ferry site is not as well located as the Application Site (or the rest of the SEWEA) to meet the needs of logistics operators and its site specific and policy constraints mean that it would only be available to meet medium to long term employment needs which are more likely (according to the EDNA) to be local in nature (*"Given this constraint, greater demand may come from the local market, with the scheme linking as much to the economy of Widnes as Warrington"*).
- 3.31. Nevertheless, the Submission Draft Local Plan (CD3.1) makes clear it will be necessary to bring forward all the sites considered within the third part of the assessment to meet the employment land requirement within the borough over the plan period.

4. Conclusions

- 4.1. In conclusion, the original Alternative Sites Assessment (2018) (CD4.101) and this update ASA has considered whether development that is being proposed at the Application Site (Six56) could be accommodated on a more suitable site either within or outside of the Green Belt.
- 4.2. The update ASA has demonstrated that a number of sites at Omega have been developed and are now occupied or are in the process of being delivered for named end occupiers. The new Omega West site has three of the four units are under construction with named end users expected to be occupied during 2023. These are therefore already “committed” and no longer available as a comparative site to the Application proposal. The fourth unit is the subject of a reserved matters application by St Helens Council, with marketing material suggesting this is available for construction in Q3 2023. A brook diversion required to facilitate the delivery of this unit is already under construction. Individually this unit would not be able to accommodate the full amount of employment development proposed at the Application proposals and as such is not a comparable site.
- 4.3. There are therefore three remaining areas that have been considered through this update ASA. These are Fiddlers Ferry (site 9), sites at Barleycastle (sites 4, 5 and 6) and the Application Site (Six 56) (site 10).
- 4.4. Whilst Fiddlers Ferry was discounted at Stage I of the original ASA (2018) it has been considered further in this update ASA due to it being identified as one of the three proposed strategic employment site allocations within the Submission Draft Local Plan (CD3.1) and it is identified as a potential site for allocation within the EDNA (CD4.93). The EDNA grades Fiddlers Ferry as A-/B- as whilst the employment would be on previously developed land and has good A-Road access, it is distant from the Motorways and therefore less

desirable for logistics, which may affect its rate of delivery. The employment delivery also requires cross enabling by residential development, that is currently located within the Green Belt. Whilst the promotor's delivery programme suggests the first phase (1.35msqft) of employment coming forward in September 2026, this assumed a planning application would have been submitted in autumn of 2022, which has not yet occurred. The site specific and policy constraints mean that it would only be available to meet medium to long term employment needs which are more likely (according to the EDNA) to be local in nature.

- 4.5. The Barleycastle sites (which are considered as six sites within the EDNA), are graded as A+/B+ or B+ within the EDNA (CD4.93). The EDNA considered them be relatively unconstrained and that they could be brought forward immediately, subject to planning, but these sites, either individually, or as a whole could not accommodate the full amount of development proposed at the Application Site (Six 56) and they don't rank as highly in the EDNA as the Application site. The Barleycastle sites are identified as Option Two in the EDNA recommendations.
- 4.6. The Application site (Six 56) is the only site with the highest grading within the EDNA (CD4.93), with A+ grade. This was as a result of it having limited constraints, good accessibility to the motorways and that it could be made available almost immediately, subject to planning (i.e. this Call-In Inquiry). This site is identified as Option One in the EDNA recommendations. If the Secretary of State grants planning permission for the Application proposal towards the end of 2023, reserved matters applications and condition discharges could be progressing during 2024 to allow enabling works to commence at the end of 2024. This would facilitate delivery of the employment units between 2025 and 2031, thereby allowing the Application Site to meet short and medium term employment needs.

4.7. Both the original ASA (2018) and this update ASA have concluded that there are no sites that are suitable for either the development as a whole, or indeed its component parts (scope for disaggregation). The Council's EDNA (CD4.93) and Submission Draft Local Plan show that:-

- The scale of employment and logistics need has been evidenced and quantified;
- The urban capacity to meet this need has been assessed;
- That additional land is required to meet the need and that this land must be found from within the Green Belt; and
- That the Application Site is the preferred location to meet the need for B8 development.

4.8. The original ASA (2018) and this update ASA have concluded that:

- The ASA methodology remains robust.
- The only new site for consideration as part of the update ASA is Omega West, which has three out of the four units being delivered and expected to be occupied during 2023. The fourth unit is currently the subject of a reserved matters under consideration by St Helens Council and as such could be under construction later in 2023, with the brook diversion required to accommodate this unit already under construction. As such there is limited availability remaining at Omega West, and could not deliver the level of development as a whole proposed at the Application Site.
- The other Omega sites (Omega South and Omega South Zone 1B) have now been delivered and as such, are no longer available.

- The only non-Green Belt site capable of meeting some employment development is Fiddlers Ferry, however, this requires residential development in the Green Belt to cross enable the delivery of the employment development, due to the high costs of demolition and remediation of the former power station site. Furthermore, this site is more remote from the motorways to render it a less preferable option for logistics developers and more likely to meet local needs.
- The Application Site (Six 56) performs best within the Council's EDNA and its Green Belt review confirms the site is a suitable site to be released to meet the critical need for employment land in the area.
- There are no sites that are suitable to accommodate either the development as a whole, or indeed its component parts (scope for disaggregation) on land outside of the Green Belt within Warrington or within the current Warrington Green Belt.

5. Appendices

Appendix I – Plan of Identified Sites

Appendix I – Key

Sites considered within the original ASA (2018):

Site Ref	Site Address	Size (Ha)
1	Omega North Extension	13.5
2	Burtonwood Brewery & White House Farm	4.22
3	Port Warrington	74.19
4	Land at Barley Castle Lane, Appleton	15.3
5	Land South of Barley Castle Farm (including land at the east end of Barleycastle Lane)	19.64
6	Land South of Barley Castle Lane	9.97
7	Omega South	18.27
8	Omega South Zone 1B	17.99
9	Fiddlers Ferry Station	330
10	Six 56, Warrington	97

Additional sites considered in this ASA Update Statement:

Site Ref	Site Address	Size (Ha)
11	Omega West	75.22

Appendix 2 – Summary Tables

Appendix 2

Table 1 - Update for Sites within the update ASA (Stage 3 sites) that were previously considered in original ASA (2018)

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
1	Omega North Extension	13.5ha	This site would not be able to accommodate the full amount of employment development proposed for the Six 56 site.	Stage 3	Substantially completed.	N/A	Site no longer available.
4	Land at Barley Castle Lane	15.3ha	The site does not benefit from immediate access to the motorway and therefore would be considered a	Stage 3	Dismissed at Appeal (LPA Ref: 2017/31757 / PINs Ref; APP/M0655/W/19/3222603)		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			<p>secondary location in this respect. However this site can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it was considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive Garden Suburb proposal.</p>		<p>for Green Belt reasons rather than any evidence of a lack of demand.</p> <p>Proposed Strategic Site Allocation in Submission Version of the Local Plan (Sept 2021) as part of South East Warrington Employment Area (SEWEA) allocation.</p>		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			<p>Individually, this site would not be able to accommodate the full amount of employment development proposed for the Six 56 site.</p> <p>This site was for a specific end user, for which the application was the subject of a planning appeal. The site was therefore not considered available.</p>				
5	Land South of Barley Castle Farm	19.64ha	The site does not benefit from immediate access to the motorway and therefore would be considered a secondary location in this respect.	Stage 3	Proposed Strategic Site Allocation in Submission Version of the Local Plan (Sept 2021) as part of South		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			<p>However this site can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it was considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive Garden Suburb proposal.</p>		<p>East Warrington Employment Area (SEWEA) allocation.</p>		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			Individually, this site would not be able to accommodate the full amount of employment development proposed for the Six 56 site.				
6	Land South of Barley Castle Lane	9.97ha	The site does not benefit from immediate access to the motorway and therefore would be considered a secondary location in this respect. However this site can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it	Stage 3	Proposed Strategic Site Allocation in Submission Version of the Local Plan (Sept 2021) as part of South East Warrington Employment Area (SEWEA) allocation.		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			<p>was considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive Garden Suburb proposal.</p> <p>Individually, this site would not be able to accommodate the full amount of employment development proposed for the Six 56 site.</p>				

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
7	Omega South (Plot 7E and 7F)	18.27ha		N/A	Completed and occupied by Jung Heinrich, the Delivery Group and Royal Mail	N/A	Site no longer available.
8	Omega South Zone 1B	17.99ha		N/A	Completed and occupied, includes Gousto and Amazon.	N/A	Site no longer available.
10	Six 56 Warrington	96ha	The Site has direct access to the motorway network and is an optimal location. The only site that meets all the requirements of the Council's EDNA in terms of direct access to the motorway network, meeting the	Stage 3	The Application Site, the subject of this Call In Inquiry. Proposed Strategic Site Allocation in Submission Version of the Local Plan		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			demand for a new strategic site along the M58 and being able to accommodate the full range of employment requirements within the borough.		(Sept 2021) as part of South East Warrington Employment Area (SEWEA) allocation.		

Sites – Status Updates

Table 2 - Additional Sites not previous considered through the ASA (2018)

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
11	Omega West	Within St Helens Authority Area.	75.22ha	Part Green Belt / Part allocated for employment development	Hybrid Planning Permission (November 2021) (LPA Ref: P/2020/0061/HYBR, PINs Ref: APP/H4315/V/20/3265899). Full permission element is under construction - TJ Morris Ltd (trading as Home Bargains).	N/A	Three of the four units associated with this site are under construction and due for occupation during 2023 with known end users. The majority of this site is therefore no longer

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					<p>Outline element - subsequent Reserved Matters for Units 2 and 3 approved 01-7-2022 (LPA Ref: P/2022/0091/RES and P/2022/0202/RES). Under construction with expectation to be occupied during 2023. Both have known occupiers, with Iceland Foods being named for Unit 3.</p> <p>Unit 4 is being marketed as 'Omega 400' for 38,755 sqm / 417,155sqft, and</p>		available to meet wider market needs. With a reserved matters submission for the fourth unit under consideration by St Helens Council, construction could commence by Q3 2023.

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					ready for development in Q3 2023. A Reserved Matters submission is currently under consideration by St Helens Council (Ref: 2023/0189/RES). The brook diversion required to accommodate Unit 4 is under construction (approved through Reserved Matters LPA Ref: P2022/0748/RES in February 2023).		Individually, the remaining part of the site (Unit 4) would not be able to accommodate the full amount of employment development proposed for the Six 56 site.

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					<p>31.22ha of this site's land is allocated for employment within St Helens adopted Local Plan (July 2022) and it is agreed through a Duty to Cooperate Agreement, that it is to contribute towards Warrington's employment need.</p> <p>The remaining 44ha is Green Belt and no agreement has been reached between St Helens and Warrington</p>		

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					<p>Councils to agree whether this is to meet either St Helen's or Warrington's employment need. St Helens indicate that they will not be able to make a decision on this until the Liverpool City Region Spatial Development Strategy and its supporting evidence base is further advanced.</p>		