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## Warrington Local Plan

**Additional Hearing Statement on behalf of Patrick Properties**

**Land at South Station Place,**

CASSIDY + ASHTON

16<sup>th</sup> June 2023

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## QUALITY ASSURANCE

**ISSUED BY:** Cassidy + Ashton Group Ltd.

██████████

██████████

██████████

Tel: ██████████

www.cassidyashton.co.uk

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	Name:	Signature:
Prepared by:	Alban Cassidy	██████████
Checked by:	Jordan Balazs	
Approved by:	Alban Cassidy	

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## 1.0 INTRODUCTION

- 1.1 This Statement is submitted on behalf of Patrick Properties, in advance of the additional hearing session on 13<sup>th</sup> July 2023 in respect to Matter 5 of the Warrington Local Plan Examination but specifically the overall employment land requirement for the Borough.
- 1.2 The Statement supports the position taken by St Modwens who are acting as partners to Patrick Properties in respect to both the land known as South Station Place, south of Birchwood railway station and land adjacent to J21 of the M6. The site is suitable for employment and infrastructure led development and detailed representations have previously been submitted to the Local Plan [UPSVLP 0436]. Although this statement does not directly promote the site, in the circumstances of the Local Plan being found unsound due to a shortfall of employment land, the site is available together with the adjacent land being promoted by St Modwen [UPSVLP 1420].
- 1.3 In respect to the additional hearing, there are three main issues that the issue of Employment Land Supply raises. These are:
- The level of Employment Land required in Warrington;
  - If an additional need is identified, the consideration of alternative sites; and
  - The implications for policy GB1 and the lack of provision for a Green Belt Review until well beyond the plan period, particularly given the potential need for additional land and the identified Employment Land Review set out in the draft Local Plan.
- 1.4 It is recognised that the Inspectors have specifically stated that the additional hearing session will only concern the issue of the overall employment land requirement for the Borough [point 1 above] and therefore the merits of our promoted site will not be discussed at this time [point 2 above]. However, the potential need for additional Land will have a direct impact upon the Green Belt and the need for a review either at this time or in the future such that Policy GB1 must also be brought into the discussion [point 3 above].
- 1.5 Accordingly, this statement will consider matters pertaining to Employment Land Supply and the potential implications for the Green Belt.

## 2.0 EMPLOYMENT LAND SUPPLY

2.1 The Inspectors have identified a number of issues in respect to Employment Land Supply that they would like to be considered at the additional hearing. These are:

- Past trends in employment land/floorspace take up in different sectors.
- The use of past take up trends to predict future requirements.
- Past trends in jobs growth in different sectors.
- The appropriate time period to analyse past trends.
- Job densities in different sectors.
- 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.
- 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.
- Specific evidence on the scale of land/floorspace required for storage and distribution uses (Class B8).
- Information on vacancy rates, rental values, net absorption, age of stock and redevelopment of sites and the implications of this.
- 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.
- The regional/sub-regional picture in terms of the requirements for employment land overall and in particular Class B8.
- 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.

2.2 These issues have been considered in substantial detail in the previous submissions made by Liberty, Langtree and St Modwen [the first two also drawing upon evidence from the current public inquiry into the planning application for the South East Warrington Employment Area]. It is therefore appropriate to consider the merits of the evidence that they have presented and the consistency between them. Each of these representations have been identified by the Inspectors as Key Documents for the purpose of the additional Hearing Session on 13<sup>th</sup> July 2023.

2.3 Given the weight attached to these Representations by the Inspectors, the purpose of this statement is to test the strength of the evidence to assist the Inspectors in being able to rely upon it.

2.4 The submission draft Local Plan identified an Employment Land Requirement of 316ha. This was drawn from the evidence prepared by the BE Group in the EDNA [Economic Needs Development Assessment] Report and subsequent Update to this issued in February 2019. In identifying the wider Economic Geography of Warrington, the Report noted:

*“The Wider Economic Geography of Warrington includes most of Wigan Borough, and the western portions of Trafford and Salford in Greater Manchester. The northern areas of Cheshire West and Chester and Cheshire East have strong links, as do Halton and St Helens in the Liverpool City Region. Although geographically more distant, Warrington also has good links with the urban centres of Manchester and Liverpool.”*

2.5 The BE Group, through this statement, were clearly demonstrating that Warrington was not a self-contained economic zone and interacted with adjoining areas to a significant extent. Any identification of an Economic Land Requirement would need to take this into account. The Update to the EDNA considered two alternative methods of estimating the Economic Land Requirement for Warrington, namely the Historic Land Take Up model and the Labour Demand model.

2.6 Notwithstanding the introduction of sensitivity testing to the Labour Demand model, the report strongly recommended the use of the Historic Land Take Up model because:

*“... the market assessment and a review of the historic trends in employment change and land take up suggest that these forecasts **underestimate land needs significantly**. The **preferred forecasting method is therefore a projection forward of past take-up rates that considers both strategic and local needs**.*

2.7 Representations to the submission draft Local Plan took a broadly similar approach but identified that the Council’s figure of 316ha should be regarded as a minimum figure with a buffer [Liberty] or should be significantly increased especially due to the growing demand from the Industry and Logistics sector [St Modwen].

2.8 However, the Inspectors’ Letter of 16<sup>th</sup> December 2022 took an alternative approach. This proposed a substantial reduction in the Employment Requirement.

2.9 The justification provided for this was that the annual housing requirement of 816 homes per annum would create a reduced Labour Supply calculated figure of 168ha.

2.10 In response to the Inspectors’ letter, the Council consultants, the BE Group provided a response on 13<sup>th</sup> January 23. This made a number of important points:

*“It is our view however that its application **does not consider some important changes that have arisen in employment patterns in Warrington in recent years**. By using the gross figures for both employment land take-up and jobs created over the period from 1996 **the Inspectors’ approach does not take into account the different jobs densities across different uses classes and the changing nature of sectoral growth in Warrington since the mid-1990s**.*

...

***The majority of the proposed Sites in the Submission Local Plan and SEWEA will be developed primarily for B8 uses where, as the calculations above show, the jobs/hectare ratios are likely to be much lower than 142 jobs/ha [as applied by the Inspectors].***

...

- 2.11 In a further indication of the concern that the Inspectors letter had generated, the BE Group also made allowance for the potential for an Employment Land review, stating:

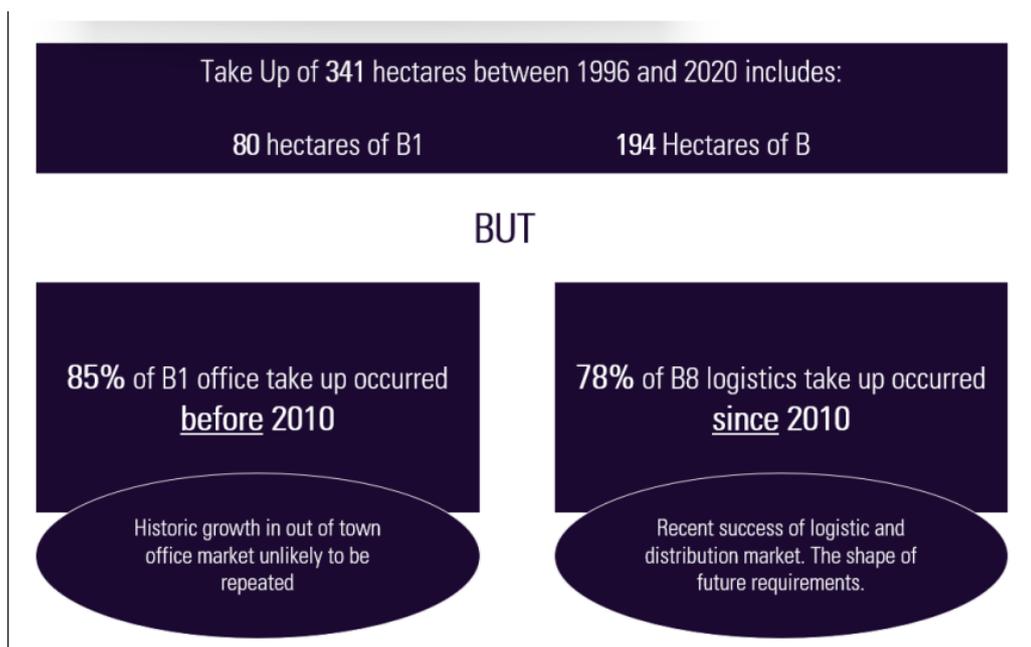
*If the Local Plan is to be taken forward on the basis of the level of employment land need as recommended by the Inspectors, we would advise the Council to ensure robust monitoring of employment land take up and job creation. If it becomes apparent through monitoring that **additional employment land is required before the end of the Plan Period, then this could be addressed through a Review of the Local Plan.** Indeed, we note that the Inspectors recognise this at Point 21 of their letter.”*

- 2.12 However, in line with protocol, the Council issued Main Modifications in line with the Inspectors’ recommendations.
- 2.13 Substantial responses were submitted on behalf of Liberty, Langtree and St Modwen.
- 2.14 Liberty undertook an analysis of the Employment Land Requirement using a version of the Labour Supply Model which took greater account of local conditions. Using this model, they identified an Employment Land Requirement of 265ha as a minimum.
- 2.15 Langtree submitted detailed representations, drawing on much of the evidence submitted to the current inquiry into the planning application on the SWWEA site. They submitted a new calculation of the Employment Land Requirement, introducing new information but also trying to address issues raised by the Inspector. This identified a minimum requirement of 280ha and regarded this as broadly similar to that identified in the Submission Local Plan. Savills advocated for a reconsideration of the Employment Land Requirement and the opportunity to make further representations. The position’s taken by the Council, the Inspector and the key Representors are summarised in Table CA1.

Stage	Source	Proposed Requirement	Approach
Submission Draft Local Plan	WBC/BE	316ha	Historic Land Take Up Model
	Liberty	316ha plus buffer	Historic Land Take Up Model [supports Council's approach]
	Langtree	Greater than 316 ha	Not specified
	St Modwen	Beyond 316ha as Identified Shortfall of 195ha in Industrial and Logistics Land plus 51 ha due to constraints at Fiddler's Ferry.	Historic Land Take Up Model adjusted to allow for shorter Look Back Period, Net Absorption and Suppressed Demand
Post Hearings	Inspectors' Letter 16 <sup>th</sup> December 2022	168ha	Labour Supply
	BE Group Response 13 <sup>th</sup> January 2023	-	Historic Land Take Up Model – best approach
Main Modifications	WBC	168ha [following Inspectors' recommendation]	-
	Liberty	265ha	Adjusted Labour Supply for comparison
	Langtree	Minimum 280ha	Historic Land Take up Model - revised
	St Modwen	As at Submission stage	Historic Land Take Up Model adjusted to allow for shorter Look Back Period, Net Absorption and Suppressed Demand

**Table CA1 Comparison of Positions on Employment Land Requirement**

2.16 It can be clearly demonstrated that it is appropriate to take other factors into account in determining Employment Land Requirement. Even in the last decade there has been a considerable shift from office development towards B8 development due to such events as Brexit and this was very clear demonstrated in the Wisner Consulting Report submitted at Main Modifications stage on behalf of Liberty. This is set out in Fig. CA1 and clearly demonstrates the shift in demand. The Logistics market remains healthy and there is no evidence that this demand will fall away.



Source : Wisler Consulting, based on Table 21 of Warrington Council EDNA

**Figure CA1** Extract from Wisler Consulting Report

- 2.17 The consistent trend from both the Council’s own consultants and from the key Representatives on this matter is that the appropriate approach to take to the calculation of the Employment Land Supply is using Historic Take Up as the starting point but taking account of specific and relevant factors. As would be expected the results of this do vary to some extent but provide a range of 265ha to well over the 316ha identified in the Submission Local Plan. All of the representations made are substantially more than the recommended figure of 168ha set out in the Inspectors’ letter of 16<sup>th</sup> December. Furthermore, the clearly preferred approach to the calculation is not to use the Labour Supply methodology.
- 2.18 The position of Patrick Properties is that they strongly support the approach set out by our partners St Modwen, but whichever approach is taken, it is clear that the Local Plan has currently proposed following the Main Modifications, is significantly short of Employment Land.
- 2.19 In this respect, it is clear that the Inspectors’ approach set out in their letter of 16<sup>th</sup> December 2022 is somewhat of an outlier in terms of the approach suggested by a series of leading practitioners.
- 2.20 To place the Warrington approach in context, it is appropriate to consider what approach has been endorsed by other adjoining Local Plan Inspector’s for authorities of a similar nature to Warrington. The approach taken for the adjoining authorities of St Helens and Halton is set out in Table CA2.

Local Plan	Date	Stage	Approach to Employment Land Requirement
St Helens	July 2022	Adopted	Historic Land Take Up
Halton	March 2022	Adopted	Historic Land Take Up including 20% flexibility buffer and allowance for large scale B8 development

**Table CA2 Approach taken to calculation of Employment Land Requirement**

- 2.21 It is important to recognise that in the adjoining Boroughs of St Helens and Halton, both of which have had Local Plans adopted within the last year or so, the Inspectors endorsed the calculation of the Employment Land Requirement on the basis of Historic Land Take Up as a starting point. It is not clear, and there has been no evidence presented as to why the approach in Warrington should be different to the two adjoining authorities who have many similar characteristics to Warrington.
- 2.22 Accordingly, it is the position of Patrick Properties that the Employment Land Requirement for the plan period of the Warrington Local Plan should as a bare minimum be restored to the 316ha outlined in the Submission Local Plan as a starting point but if the plan is to be sufficiently robust it should be increased in line with the Representations previously made by St Modwen. In addition, and given the conflicting positions and lack of certainty it is even more imperative to allow for an early review of the Employment Land Requirement within the Borough and therefore the potential for an early review of the Local Plan.

## 3.0 GREEN BELT

- 3.1 Given the position identified in respect to Employment Land Requirements in Warrington, it will also be necessary to consider the relationship of the requirement with Policy GB1 in respect to the Green Belt.
- 3.2 As set out in the submission draft Local Plan and notwithstanding the Main Modifications, Policy GB1 sets out that there will be no change to the Green Belt boundaries until at least 2050. This is a period of at least 27 years and goes well beyond any normal approach to Green Belt even if permanence is a key characteristic.
- 3.3 Given the uncertainty in respect to the appropriate methodology for the calculation of the Employment Land Requirement, and the potential need [already identified by the Council, its advisors and the Inspectors] for an Employment Land/Local Plan Review it is wholly inappropriate for Policy GB1 to stipulate that there will be no change to the Green Belt boundary:
- ‘... throughout the Plan Period and to at least 2050.’*
- 3.4 National planning guidance already states that for any change to a Green Belt boundary there is a requirement for ‘Exceptional Circumstances’ to be demonstrated. There is no justification for any further, time related constraint to be added to this, particularly given the circumstances set out in para. 3.3. above. This requirement should therefore be deleted. Subsequently, if any changes to the Green Belt are required following the additional Hearing Session and the need for additional land, further changes will be required to Policy GB1. Any consideration for additional land should take full account of existing or potential sustainable travel options.

## 4.0 CONCLUSION

- 4.1 This statement has been prepared in advance of the Additional Hearing Session to discuss the Employment Land Requirement for Warrington. The Statement has considered the approach taken in the preparation of the three main submissions identified by the Inspectors as Key Documents for the Session.
- 4.2 Although the submissions have a degree of variation, there is a consistency in the approach taken such that it would appear clear that Historic Land Take Up, with allowances for changes in circumstances and recent trends, is the appropriate way to calculate future Employment Land Requirements. This approach has also been endorsed by the Inspector for the two adjacent authorities of Halton and St Helens. As such the previous Requirement of 316ha should at least be reinstated or increased in line with the submission made by St Modwen.
- 4.3 Furthermore, there will be a consequential change to Policy GB1 to remove any reference to no changes until after 2050 and potentially to take account of the release of additional land for Employment.



# Cassidy+Ashton



Lancashire Office:

[Redacted]  
[Redacted]  
T: + [Redacted]

Cheshire Office:

[Redacted]  
[Redacted]  
T: + [Redacted]  
E: [Redacted]  
[Redacted]

North Wales Office:

[Redacted]  
[Redacted]  
T: + [Redacted]  
E: [Redacted]  
[Redacted]

South East Office:

[Redacted]  
[Redacted]  
[Redacted]  
T: [Redacted]  
E: [Redacted]  
[Redacted]

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