
Examination of the Warrington Local Plan

Additional Hearing session Concerning the Employment Land Requirement

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

(Respondent No. 1420)

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1. Introduction

- 1.1. This Hearing Statement is submitted in relation to the Warrington Local Plan Examination. The Statement is prepared and submitted by Savills (UK) Limited on behalf of St Modwen Developments Limited. St Modwen has a land interest in Junction 21 of the M6 as shown outlined on the plan included at **Appendix 1**.
- 1.2. As the Inspectors will be aware, St. Modwen is committed to working alongside Patrick Properties in relation to the wider site that is shown on the two parcels of land identified on Drawing Ref. 01-212 Revision A that is included at **Appendix 2** in to ensure the comprehensive development of both parcels of land to realise development that delivers sustainable economic growth in Warrington and provides for wider social and environmental benefits in the delivery of sustainable development at the site. The parcels of land measure 71.5 and 100 hectares respectively and would be accessed from Manchester Road that provides access to Junction 21 of the M6. The parcels also have the opportunity to provide substantial benefits to public transport infrastructure that is covered in the submissions provided by Patrick Properties.
- 1.3. We appeared on behalf of St Modwen at the Examination in Public into the Local Plan in relation to Matters 3 and 5 at the original hearing sessions. Those Matters are of direct relevance to the additional hearing session concerning employment land requirement. This Hearing Statement should be read in conjunction with the evidence we provided in relation to those Matters. Therefore, to avoid repetition, the Hearing Statements in relation to Matters 3 and 5 are appended to this Statement at **Appendices 3** and **4**, and are cross-referred to in this Statement. They will also be referred to at the hearing session having been confirmed in ID10 by the Inspectors to be key documents relevant to the hearing session.
- 1.4. Further, we have included at **Appendix 5**, the Main Modifications Statement (Reference MMC061) submitted on 26 April 2023 in connection with the Main Modifications consultation for the emerging Local Plan, which outlines both the additional need for employment land within Warrington and that the Inspectors' analysis in putting forwards the Main Modifications to the plan was not robust to form the basis of an evidence base for objectively assessing needs for a development plan for Warrington.

1.5. The essence of the evidence put forward within this submission is that it demonstrates that the emerging Local Plan is demonstrably unsound. That evidence provides an objectively assessed need that accords with the National Planning Policy Framework ('NPPF') and Planning Practice Guidance ('PPG').

1.6. The evidence therefore demonstrates that the emerging Local Plan is not:

1. Positively prepared as it does not provide a strategy that meets Warrington's objectively assessed needs.
2. Justified as it is not based on proportionate evidence. The proportionate evidence demonstrates that there is a significant requirement for additional land for employment development to meet the area's needs.
3. Effective as additional land will be required over the emerging Local Plan-period to meet Warrington's employment land need.
4. Consistent with national policy as the Plan does not place 'significant weight' on the need to support economic growth and productivity as required by Paragraph 81 of the NPPF, and nor does it make sufficient provision for storage and distribution operations as required by Paragraph 83.

1.7. The Statement therefore concludes that amendments are required to the Local Plan in order for it to be made sound. The principal amendment put forward for this hearing session is an amendment to Policy DEV4 to provide details of the objectively assessed need for employment land in Warrington based on a robust and up to date evidence base for assessing employment land requirements.

- 1.8. The consequence of that amendment means that further amendments are required to policies in order to allocate sites to meet that objectively assessed need and to confirm, in the specific instance of the site subject to this Statement, that it has been removed from the Green Belt. Policy GB1 would therefore need updating along with the associated Figure 6 to confirm that the site has been removed from the Green Belt. We would suggest a new 'Main Development Area' policy would be required to allocate the site for employment development purposes to assist in ensuring that objectively assessed employment needs in Warrington can be met over the Plan period and beyond (in accordance with the NPPF). We appreciate that matters relating to the allocation of the site would require further review at a hearing session, but given the significant need for additional employment land in Warrington, we consider that it is important to raise both the requirement to allocate additional sites to meet that need, and where it would be appropriate to meet any need identified.
- 1.9. We also consider that a further amendment to Policy GB1 to resolve the tension between: (i) the Council acknowledgement (Paragraphs 4.2.22 and 5.1.19 of the emerging Local Plan) that it needs to review its employment land requirements before the end of the Plan-period and (ii) a policy objective at Part (1) of Policy GB1 that the general extent of the Green Belt boundaries won't be reviewed until long after the Plan period. The Plan period is until 2038 and Policy GB1 confirms that Green Belt boundaries will not be reviewed until at least 2050. If the Council needs to review, as it has confirmed it will, its Green Belt boundaries before the end of the Plan period then Part (1) of Policy GB1 has no reasonable or sensible meaning and should be removed.

2. Statement

Background and Context

- 2.1. The starting point for assessing employment land need should be to assess the role that a location plays in meet economic needs and the performance of that location in meeting employment needs.
- 2.2. In that regard, we comment that Warrington is a prime Industrial and Logistics ('I&L') location within its wider sub-region in the North West due to its adjacency to the nationally significant M6 corridor plus key east-west routes being the M62 and M56. It being a prime I&L location is clearly evidenced within Savills Employment Needs Assessment (November 2021) ('SENA') that is included at **Appendix 3**¹. For ease of reference given the SENA is located within an appendix to a further appendix, we include a copy of the SENA at **Appendix 6**. The relevant sections setting out the regional and local market are Sections 4 and 5 of the SENA.
- 2.3. We intend to explain the role of Warrington within the regional and local market by reference to the SENA at the Hearings, but it is important to note, that Warrington has been the strongest performer in its Functional Economic Market Area ('FEMA') for new deliveries of I&L floorspace over the last 10 years. Linked to this, it has been one of the better performers in facilitating demand along with Halton and St Helens who have all recorded net absorption as a % of inventory² of 2.3% er annum ('p.a') or more, with Warrington recording the highest level in absolute terms (529,479 sq. ft p.a).
- 2.4. However the wider FEMA, like Warrington has recorded demand levels well above the rate of new deliveries of stock over the last 10 years. In fact, demand across the wider FEMA at 2,502,509 sq. ft p.a has been over 80% higher than new deliveries at 1,384,708 sq. ft p.a. The consequence of this absence of delivery is why availability within the FEMA has been below the 9% equilibrium rate since 2013/2014 (see Paragraph 1.18 of the Matter 3 Statement included at **Appendix 4**).

¹ The SENA is included at Appendix D of Appendix 1 within **Appendix 3**.

² This metric measures demand relative the size of a market area's inventory

- 2.5. Accordingly, there is a severely supply constrained sub-regional market where demand outpaces supply. New supply is therefore needed immediately, especially within Warrington given its prime location. No location within the region appears to have a healthy and immediate surplus of supply to help meeting Warrington's needs. To illustrate this point further it is worth considering how many years of I&L supply Warrington and the wider FEMA has by comparing availability with annualised net absorption.
- 2.6. Dividing availability by annualised net absorption over the past 10 years indicates Warrington has only 2.4 years of supply while the FEMA supply / demand balance is similar at only 2.5 years of supply. When looking at annualised net absorption over the last 5 years, the supply/demand balance worsens to just 1.8 years of supply for Warrington and 2.4 years for the FEMA. These results are displayed in the table below.

	Available Supply (sq. ft) (A)	Ave. Annual Net Absorption (10-year average) (B)	Ave. Annual Net Absorption (5-year average) (C)	Years supply using 10 year net absorption trend (A/B)	Years supply using 5 year net absorption trend (A/C)
Warrington	1,251,548	529,479	686,872	2.4 years	1.8 years
FEMA	6,283,734	2,502,509	2,592,582	2.5 years	2.4 years

Table 1 – I&L Supply in Warrington and its FEAM

- 2.7. The above demonstrates the critical role that Warrington plays within the FEMA for delivering I&L floorspace, and wider regional and national economy and the significant demand for additional floorspace within it.

Analysis on Employment Land Demand

- 2.8. We covered the analysis on calculating employment land demand in detail at the Local Plan Examination Hearing sessions in relation to Matters 3 and 5. Detailed information was included in the Hearing Statements at **Appendices 3** and **4** that provided the assessment of the demand for employment land based on a robust and justified methodology.
- 2.9. The Hearing Statements included at their own Appendix 1 the Local Plan Promotion Document ('LPPD') submitted to the Council in November 2021 as part of the Regulation 19 consultation on the emerging Local Plan. Appendix D of the LPPD included a Savills Employment Needs Assessment ('SENA'), which we have included for ease at **Appendix 6**. The methodology was covered in the Hearing Statements for Matters 3 and 5 and discussed in detail at the hearing sessions to outline the case for employment land demand.
- 2.10. In outlining the Main Modifications required to make the emerging Local Plan sound, we were therefore surprised that as part of the Main Modifications, no detailed analysis was undertaken or commented on by the Inspectors of the evidence presented in either the Hearing Statements, the LPPD and the SENA and discussed in detail at the hearing sessions.
- 2.11. We were therefore disappointed that the trigger for the additional hearing session, only arose as a consequence of evidence presented by another party as part of the Main Modifications consultation. We consider that if that analysis had taken place, an understanding of the market-leading evidence that was presented by Savills in its SENA, and has been endorsed by the British Property Federation ('BPF') in our 'Levelling Up – The Logic of Logistics' report (a copy of which is included at **Appendix 7** for ease of reference)³, would have established how the evidence for employment land demand that supports the emerging Local Plan results in the Plan being demonstrably unsound. We therefore consider that a detailed review of the SENA is required as part of the hearing sessions in order that proper weight is given to the evidence contained within it in order to ensure that any future Plan that is adopted can be considered to be sound.
- 2.12. The conclusion of the SENA is that an additional 195 ha of employment land is required in Warrington to meet employment land demand requirements above the level forecast by the Council in the emerging Local Plan considered at the hearing sessions (i.e. the prior to Main Modifications version of the emerging Local Plan).

2.13. We therefore consider that the starting point is that the evidence in the EDNA is not a robust basis for the production of the emerging Local Plan. It further follows that the employment land supply position that is reduced by 148.26 hectares and was put forwards as part of the Main Modifications consultation is also not robust. The Inspectors provided a letter, dated 16 December 2022, to calculate its own employment land requirement that resulted in the above reduction with the analysis provided at Paragraphs (4) – (18) of that letter. We consider that the information utilised by the Inspectors does not reflect the characteristics of Warrington as an economic location and its role within the FEMA. It is generic, not evidenced and therefore not robust.

2.14. Given the level of employment land demand set out by the Inspectors is lower than the level set out in the EDNA Refresh, it follows that if the EDNA Refresh is not robust as it underestimates the required level of employment land required, then the assessment of the Inspectors', which is significantly lower than the EDNA Refresh level of demand, would also not be robust.

2.15. The Savills assessment of demand for land for I&L development is included at Paragraphs 6.3.1 – 6.4.3 of the SENA **Appendix 6**. Our intention is to talk through that analysis in detail, with the methodology being summarised in detail at Paragraph 6.3.9, which sets out that the analysis follows the following steps:

1. An estimation of historic demand
2. An estimation of suppressed demand
3. A projection of the combined historic and suppressed demand
4. An adjustment for current and future increases in online retail
5. The addition of a three-year buffer
6. An allowance for displacement

2.16. The above assessment produces a calculation that forecasts the required total floorspace over the emerging Plan-period is 15.97 million sq. ft (see Table 6.5 of the SENA). Utilising an average evidence based plot ratio of 30% (see Table 6.6 of the SENA), it follows that the forecast future need for employment land is 494.62 ha (see Table 6.7 of the SENA). This results in a requirement for an addition circa 195 ha of employment land to be allocated over the emerging Local Plan period and is reflective of the role that Warrington plays in the FEMA. The wider site being put forward at Junction 21 of the M6 can make a material contribution to meeting that demand.

2.17. We consider the above to be a robust and justified approach to assessing the requirements for I&L land within Warrington given its role within the FEMA. The Savills methodology addresses the fundamental flaws of the historic take up rate and labour demand methodology and is compliant with the requirements of the PPG as it:

- Analyses *'market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies'*⁴. If a market is identified as being supply constrained (i.e. demand exceeds supply) such as Warrington, the Savills model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints). On the other hand, by projecting forward the historic supply trend, the EDNA is not responding to market signals and assessing future employment land requirements for I&L development. By contrast, basing demand on take up rates over a period from 1996 is not sound; and
- Applies *'economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector.'*⁵ The Savills method quantifies how much I&L floorspace growth is linked to current and future e-commerce growth which is the major growth driver for the sector driving both demand for the supply-chain, and also the manufacturing of goods. On the other hand, the EDNA's historic trend approach and look back period to the mid-90s has little regard to how the sector has changed nor current day and future growth drivers impacting the sector.

⁴ In accordance with PPG, Paragraph: 031 Reference ID: 2a-031-20190722

⁵ Ibid

2.18. In terms of the methodology provided in the EDNA Refresh that informed the Council's approach to allocating land for employment purposes, there are a number of deficiencies in the way future needs have been assessed, which we will review in detail with the Inspectors at the Hearing session and are covered in the SENA and summarised as follows:

- **The Look-back Period is Too Long:** the lookback period over which average take-up (demand) is calculated runs for 24 years from 1996 to 2020. This is far too long a period over which the demand drivers underpinning I&L need, and the characteristics of the sector itself, have changed significantly. For example, the last decade has seen a significant increase in online shopping from 2.8% in 2006 to 19.1% in February 2020. The Covid-19 pandemic has accelerated this trend further with online shopping currently sitting at 25.9% of all retail sales (September 2021). Growth in online retailing has a direct impact on I&L demand as going online requires 3 times the amount of warehouse floorspace compared to traditional bricks & mortar shops. Such a long look-back period also dampens the impact of other, more recent, growth drivers for I&L demand such as increasing UK freight volumes, UK companies bringing their operations back to the UK to avoid Brexit related supply chain shocks and continued business and housing growth in Warrington and the wider FEMA. Finally the inclusion of the Global Financial Crisis ('GFC') in the 24 year look back period also undercuts historic demand as this resulted in a systematic impact to the entire UK economy. In the years immediately following the GFC, I&L demand in Warrington was negative (-91,411 sq. ft net absorption per annum) vs 638,000 sq. ft of net absorption per annum since 2012.
- **The EDNA uses Completions rather than Net Absorption:** the EDNA's measure of take-up is based on completion trends rather than actual take-up of floorspace (what Savills refer to as net absorption). Development completions are a supply measure, not a demand measure. For new development (completions) to come forward new employment sites need to be allocated, and planning permission granted before new floorspace can be built. The length of time and complexities involved is why supply measures (completions) typically lag actual demand (net absorption). Therefore the use of a lagging supply factor, and projecting this forward into the future, results in an underestimate of true need based on actual market demand.
- **The EDNA doesn't account for suppressed demand:** when supply, as signalled by floorspace availability, is low, demand is suppressed as prospective tenants can't find space in a market. By merely projecting forward historic take-up, the EDNA has taken no account of demand that has been lost due to

supply constraints and therefore presents a need profile based on a supply constrained trend (or 'suppressed demand'). Since 2015, I&L availability has been a downward trajectory and has now dropped below the 9% equilibrium rate for Warrington that is considered to indicate a balance between supply and demand. The rest of the FEMA has been below the 9% equilibrium rate since 2014 demonstrating, as a whole, the entire FEMA has been supply constrained for much of the last decade. The Savills methodology for estimating future demand is therefore more realistic than the EDNA as it attempts to understand true demand rather than project forward historic trends that have been suppressed by historic supply constraints.

2.19. We will discuss the above in more detail at the hearing sessions with reference to the evidence provided in the SENA that accompanies this submission. Accordingly, we conclude that the Savills methodology for estimating future demand is therefore more realistic and evidentially justified than the EDNA Refresh as it attempts to understand true demand rather than project forward historic trends that have been suppressed by historic supply constraints. With that in mind, it is further concluded that the methodology is also more realistic than and justified than the analysis put forward by the Inspectors to support the Main Modifications.

2.20. The consequence of the above is that an amendment to Policy DEV4 will be required to provide details of the objectively assessed need for employment land in Warrington based on a robust and up to date evidence base for assessing employment land requirements. We consider that this update should be based on the Savills methodology outlined above which accords with the approach required under the NPPF and PPG and will ensure that Policy DEV4 can be justified, effective and consistent with national policy.

Additional Matters

- 2.21. The effect of the above is that there is a requirement to allocate additional land for I&L development in the emerging Local Plan and to assess the locations where that development can be met. At present under the Main Modifications version of the emerging Local Plan, one principal location is allocated to meet the significant majority of that employment need – i.e. Fiddlers Ferry. We provided detailed commentary in our Matter 6c Hearing Statement and at the hearing sessions into our view that not all of that site will be delivered during the emerging Local Plan period. We don't intend to revisit that matter other than to state that our view remains that the timeline for delivery of that site remains unrealistic and it is not robust to conclude that all of the land will be delivered for employment purposes within the Plan period. Accordingly, essentially placing all the employment need for Warrington as forecast by the Inspectors – that itself is not justified – in one allocation is a risk that has the potential to undermine the ability for the area to meet its employment needs.
- 2.22. Given the significant levels of unmet need for employment development that will not be met by the existing allocations in the Main Modifications as evidenced above, there will therefore be a requirement to consider where that additional need for employment land that is above the level currently presented by the Council and Inspectors in the Main Modifications to the emerging Local Plan can be met.
- 2.23. We note the Inspectors comments at Paragraph 7 of ID10 that the Hearing session will only concern the issue of overall employment land requirement in the Borough and therefore that the consideration of allocations and their merits will not be covered by the Session. Whilst we don't intend to raise the allocation and its merits at the hearing session, unless specifically requested by the Inspectors, it follows that if the Inspectors agree that there is an additional level of employment need above the level that they have put forward in the Main Modifications, there will be a requirement to assess where that need can be met at future hearing sessions as we understand that there would need to be further Main Modifications to the emerging Local Plan to set out what the need is and where that need can be met.

2.24. Against that background, we therefore comment that the overall site promoted by St Modwen and Patrick Properties can play a role in meeting the additional need forecast above the level being consulted on as part of the Main Modifications and as is demonstrated in the LPPD within **Appendix 3**⁶ and the representations provided by Patrick Properties, that the site is deliverable and we request that it be allocated under a Main Development Area policy. If the Inspectors agree that there is a requirement for additional employment land (which we evidence above there is) above the level that they forecast in the Main Modifications that is currently subject to consultations, then any allocation required to meet that forecast need would be required to be subject to a separate set of policies to be considered at future hearing sessions and consulted on. We therefore put forward the site to meet that need as a Main Development Area and confirm our request to participate in any future hearing session. Further, it follows that in the case where the site were to be allocated as a Main Development Area, Part 3 of Policy GB1 would also need to be updated to confirm the removal of the site from the Green Belt, with the relevant boundary also being altered on Figure 6.

2.25. Further still, and of direct relevance to the additional hearing session that this Statement is submitted pursuant to, we re-raise the inconsistency in Policy GB1, which is covered at Paragraphs 2.18 – 2.21 of the Main Modifications Statement (MMC061).

2.26. Policy GB1 states at Part 1 that:

'The Council will maintain the general extent of the Borough's Green Belt, as defined on the Local Plan Policies Map, throughout the Plan Period and to at least 2050.'

2.27. As confirmed at Paragraph 3.3.26 of Main Modifications Reference MM002:

'The Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.'

⁶ The LPPD is included at Appendix 1 of that Hearing Statement.

2.28. It follows that the policy aim of Policy GB1 is inconsistent with the Council's commitment to undertaking a review into Warrington's employment land needs before the end of the emerging Local Plan. The Council's long-standing position is that meeting its future employment needs can only be met through Green Belt release (this was documented by the Council in Paragraph 3.4.7 of the emerging Local Plan).

2.29. The policy aim of Policy GB1 to not further alter the Green Belt boundaries until at least 2050 is therefore inconsistent with the Council's acknowledgement that employment land needs will need to be assessed before the end of the emerging Local Plan period. Accordingly, the words 'throughout the Plan Period and to at least 2050' would need to be removed from the Policy as it is not justified. It is not an appropriate strategy when it is acknowledged that employment land needs will need to be assessed again before the end of the Local Plan period. This is acutely the case given that:

1. The Inspectors have forecast a level of need significantly below the objectively assessed need for employment land as set out above;
2. The uncertainty that the decision to substantially reduce the level of need in conflict with the level of objectively assessed need has created around the delivery of employment development in the Warrington area;
3. There is no safeguarded land which would typically be anticipated to be required where there are limited employment allocations put forward, particularly in areas of high employment land demand that are critical to the economic sustainability of the FEMA; and
4. That even before the Main Modifications, the Council had already confirmed that there would be a requirement to review the level of employment land need before the end of the emerging Local Plan period.

2.30. Accordingly, as part of the amendments to be considered under this Hearing session, we consider that discussion around the inconsistencies of Policy GB1 will be important.

Summary

- 2.31. We summarise that the evidence base that was provided for the original hearing sessions therefore demonstrates that the emerging Local Plan has significantly under-assessed its objectively assessed need for employment land.
- 2.32. Further, the Planning Inspectors are recommending as part of the Main Modifications that the employment land supply position is reduced by 148.26 hectares. The Inspectors provided a letter, dated 16 December 2022, to calculate its own employment land requirement, with the analysis provided at Paragraphs (4) – (18) of that letter. The information utilised by the Inspectors does not reflect the characteristics of Warrington as an economic location and its role within the Functional Economic Market Area ('FEMA'). It is generic, not evidenced and therefore not robust.
- 2.33. The basic analysis of the Inspectors is that number of jobs reflect the number of houses planned. That simply does not, and has never reflected, employment trends.
- 2.34. Put another way, if regional cities that typically have stronger office markets provided only the forecast amount of floorspace for the residents and number of homes planned in their administrative areas, then the planned requirement for office floorspace in those cities in their local plans would either be substantially lower or non-existent. That simply is not the case given the economic roles that those cities play on a regional and national basis.
- 2.35. The same is the case with Warrington and the I&L market. The characteristics of Warrington and the infrastructure that surrounds it, and has surrounded it for a large period of time means that it plays a substantial I&L role within its FEMA serving I&L development needs on a regional and national basis. Those are the characteristics that need to be applied when assessing objectively assessed needs for Warrington.

2.36. The basic analysis of the Inspectors is therefore not robust. The straightforward point is that the Inspectors have not had regard to market signals as required by Paragraph 31 of the NPPF and the information utilised to calculate job requirements and therefore employment land requirements for Warrington by the Inspectors does not relate to the FEMA that Warrington serves.

2.37. It follows that the true requirement for additional employment land to be allocated in the Borough is significantly more as demonstrated above.

3. Conclusion

- 3.1. The above and the previously provided evidence demonstrates that the emerging Local Plan is demonstrably unsound. That previously provided evidence needs to be reviewed as it provides an objectively assessed need that accords with the NPPF and PPG. The approach adopted by the Inspectors is not robust or sound as demonstrated above. It follows that the emerging Local Plan should not be found sound for the reasons stated at Paragraph 1.6 above.
- 3.2. We have set out above an objectively assessed need for employment land that will ensure that the emerging Local Plan can meet the requirements of the NPPF, as it will be:
1. Positively prepared as it will provide a strategy that meets Warrington's objectively assessed needs.
 2. Justified based on proportionate, robust evidence for objectively assessed land required for employment development to meet the area's needs.
 3. Effective as a it will ensure that the result in employment land demand levels being met.
 4. Consistent with national policy as it will ensure that the Plan places 'significant weight' on the need to support economic growth and productivity as required by Paragraph 81 of the National Planning Policy Framework ('NPPF'), and makes sufficient provision for storage and distribution operations as required by Paragraph 83.
- 3.3. As a consequence amendments to Policy DEV4 will be required to reflect the objectively assessed level of need. We therefore conclude that in order to make the emerging Local Plan sound, the overall site subject to this Statement will also need to be allocated as a Main Development Area to meet that need.
- 3.4. Amendments to Policy GB1 are also required as set out above Paragraphs 2.25 – 2.30 above, which are fundamental to the soundness of the emerging Local Plan.