



Examination of the Warrington Local Plan

Main Modifications 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 Main Modifications Statement is submitted in relation to the Warrington Local Plan Examination, Main Modifications consultation. The Statement is prepared and submitted 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. Savills (UK) Limited appeared on behalf of St Modwen at the Examination in Public into the Local Plan in relation to Matters 3, 5 and 6(c). This Main Modifications Statement should be read in conjunction with the evidence provided by Savills in relation to those Matters.
- 1.3. This Statement submits a representation in relation to the following matters that concern employment and Green Belt matters:
 - MM001
 - MM002
 - MM005
 - MM007
 - MM021
 - Figure 3
 - Figure 4
 - Figure 6
- 1.4. In addition as part of our reference to MM007, we continue to make reference to Policy GB1 that provides an inconsistent term that needs to be reconciled before the Local Plan could be adopted and we comment further on this in detail below.

2. Representations

Background and Context

- 2.1. The substantive point remains that the emerging Warrington Local Plan that was submitted for Examination and amended and subject to Main Modifications does not meet the objectively assessed needs for employment land in the Borough. The objectively assessed needs for employment land provided by Savills as part of the Examination process demonstrates that the Local Plan has a requirement to allocate significantly more land for Industrial and Logistics ('I&L') development over the emerging Local Plan period to meet Warrington's employment land needs.
- 2.2. The evidence base that was provided for Examination in Public therefore demonstrates that the emerging Local Plan has significantly under-assessed its objectively assessed need for employment land. The effect of this is that further Green Belt sites are required to be allocated to meet this minimum level of need. The Plan is therefore currently unsound but can be made sound by the allocation of St Modwen's site.
- 2.3. 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.
- 2.4. 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.

- 2.5. 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.
- 2.6. 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.
- 2.7. 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 National Planning Policy Framework (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.
- 2.8. It follows that the true requirement for additional employment land to be allocated in the Borough is significantly more. We therefore consider on the basis of the evidence provided by the Inspectors 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 a it does not allow for the level of objectively assessed 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 National Planning Policy Framework ('NPPF'), and nor does it make sufficient provision for storage and distribution operations as required by Paragraph 83.

2.9. The Inspectors' analysis cannot therefore form the basis of an evidence base for objectively assessing needs for a development plan for Warrington. If it were to do so, the emerging Local Plan would be demonstrably unsound.

Representations on Main Modifications

2.10. Against the above background, we therefore comment that the following amendments are required to the Main Modifications:

- MM001

2.11. Paragraph 1.2.12 should reflect the evidenced based objectively assessed need for land to be removed from the Green Belt.

- MM002

2.12. Paragraphs 3.2.3 and 3.3.19 should reflect the evidenced based objectively assessed need for land to be removed from the Green Belt.

2.13. In addition, Paragraph 3.3.21 needs to be amended to reflect the additional employment land need above Omega West.

2.14. Paragraph 3.3.23 should include the St Modwen site as a site to be allocated as a main employment site in order to meet that need as described above. Figure 3 should be updated to show the allocation of the St Modwen site in order to meet that need.

- MM005

2.15. Part 1 of Policy DEV4 should be updated to reflect the level of employment land required as stated at Paragraph 2.12 above and Part 4 should designate the St Modwen site as a site to meet Warrington's employment land requirements. Figure 4 also needs updating to include the site within that diagram as a proposed employment site.

2.16. Paragraph 4.2.13 should be removed as it is not an objectively assessed or sound analysis of employment land need.

- MM007

2.17. Part 3 of Policy GB1 should confirm that the St Modwen site should be shown as being removed from the Green Belt and the relevant boundary altered on Figure 6.

2.18. In addition, we re-raise the inconsistency in Policy GB1. The Policy 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.'

2.19. As confirmed at Paragraph 3.3.26 of 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.'

2.20. 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).

2.21. 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.

Conclusion

2.22. 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 Planning Practice Guidance. 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 2.8 above.

2.23. Overall, we conclude that the Examination needs to be reopened to review employment land matters in order for the Local Plan to be found sound and that this should be undertaken at the earliest opportunity. We would be grateful if this request could be met and welcome notification that this is the case.