

Additional Hearing Session

Action Point 4

July 2023

Warrington Borough Council Response on Action Point 4, Emerging from the Warrington Examination in Public Session of 13th July 2023

Action Required: “WBC to look at annual monitoring report data and do note on redevelopment of sites/displacement in response to points made by Mr Kingham obo Langtree”

Response:

Allowing for Losses in the EDNA

It should be noted that the EDNA OAN is based on gross employment land take up. In addition, to allow for the uncertainty on what further losses might occur over the 2021-2038 Local Plan Period, the following additions were made to the baseline Objectively Assessed Needs (OAN) in the 2021 EDNA Refresh (Document EC2):

- A Buffer of three years additional take up, 14.22 ha/year under the Strategic/Local Take Up Trend, for unspecified losses in the developed stock and the resulting displacement of businesses and jobs within Warrington Borough = **42.66 ha**
- An analysis of the projected impact of Warrington Town Centre/Southern Gateway masterplanning suggests additional land needs of **17.64 ha**, to accommodate firms displaced from housing redevelopment sites (see Section 4.0 the 2021 EDNA Refresh (Document EC2)).

Thus, out of a final gross OAN of 316.26 ha, **60.30 ha** or 19.1 percent, is specifically allocated to mitigate the loss of land in active E(g), B-Class use to alternative uses and the resulting displacement of businesses and jobs within Warrington Borough.

Recorded Losses

The Council has provided details on the loss of employment land in Table 1 below. This covers the period from 2014/15 following the adoption of the Local Plan Core Strategy 2014 up to 2021, i.e., the start point of the Warrington Updated Proposed Submission Version Local Plan (Document SP1).

The Local Plan Core Strategy 2014 includes a specific monitoring indicator - ED4: Employment Land lost to other uses - which is reported in the Council’s Annual Monitoring Reports (AMRs). All AMRs following the adoption of the Local Plan Core Strategy are available on the Council’s web site:

<https://www.warrington.gov.uk/planning-policy-archives>

Table 1 – Employment Land Losses Recorded in Annual Monitoring Reports 2015-2020

Monitoring Period	Recorded Losses, ha*	Comments
1 st April 2014-31 st March 2015	1.11	All losses to Sui Generis Uses
1 st April 2015 to 31 st March 2016	70.43 (of which 19.07 represents a loss of local developed or undeveloped employment land)	Losses include 51.36 ha lost to residential use at Omega (App. No. 2015/26469 although this site was not included in forward trajectory as it was strategic), 5.31 ha lost to retail at Former FIAT Warehouse on Winwick Road (App. No 2011/18583) 6.16 ha lost to Sui Generis use (Car Sales) at Calver Road (App. No 2016/27383) and 7.60 ha lost to residential use at Gemini 16 (App. No. 2015/26158).
1 st April 2016 to 31 st March 2017	4.22	
1 st April 2017 – 31 st March 2018	0.95	
1 st April 2018 to 31 st March 2019	0.45	
1 st April 2019 to 31 st March 2020	1.30	
1 st April 2020 to 31 st March 2021	11.3	Loss was all at Omega (App. No. 2019/36241) although this site was not included in forward trajectory as it was strategic
Total	89.76	
Total – minus 2015/16 and 2020/21 strategic data	27.10 (3.87 /year)	
Total – minus strategic data and Calver Road / Gemini sites	13.34 (1.91/year)	

*As identified in Monitoring Criteria 'ED5: Employment Land lost to other uses (Hectares)' of the Relevant Annual Monitoring Reports

Source: Warrington Borough Council – Warrington Annual Monitoring Reports, 2015-2020

Table 1 shows total losses of 89.76 ha over this period. However, considering the year on year loss figures, the 2015-2016 and 2020-2021 losses clearly stand out as anomalous, against more normal averages lost per year. However, nearly three quarters of the 70.43 ha, 51.36 ha in 2015/16 and all of the 11.3ha in 2020/21, was strategic employment land at Omega, lost to housing. This land was undeveloped prior to its residential consent, lacking the infrastructure

required to make it deliverable for E(g)/B-Class Uses. Thus, it only represented the loss of potential, strategic only, employment land for the Borough with no businesses displaced when the housing consent was developed. It also represented a unique loss in terms of scale and location, which could not be repeated given that the existing Omega site is now fully developed. For these reasons BE Group would argue that it should not be treated as a loss of local, readily available employment land.

The 6.16 ha site at Calver Road (previous Council reference 365) was highly constrained land, a former landfill site crossed by pylons. There were no existing businesses on the site which would have been displaced and it is questionable if it could ever have been delivered for normal E(g)/B-Class Uses. However, it was identified as part of the employment land supply in the 2016 Employment Land Needs Assessment (EDNA, Document EC4), and its loss was a supply consideration, at that time. Similarly, while the Gemini 16 site was also identified as employment land supply in the 2016 Employment Land Needs Assessment (EDNA, Document EC4), it also had no existing business on the site which would have been displaced and also had deliverability questions over its ability to come forward for office development.

It should also be noted that at the time the Omega and Gemini residential applications were given consent, the Council did not have a 5 year housing land supply. This followed the Local Plan Core Strategy's housing target being quashed in the High Court. As such, there was a presumption in favour of residential development. On adoption of the new Local Plan, the Council will be able to demonstrate a 5 year housing land supply and therefore will be in a more robust policy position to resist future employment land losses.

The Council is confident that it has given appropriate consideration to the redevelopment of sites / displacement of existing businesses in preparing its evidence base through the buffer and detailed consideration of existing land which is most likely to be displaced through the Council's regeneration plans for the town centre and surrounding area.

Nevertheless, in considering the losses in Table 1, the Council considers the most relevant would be the 1.91ha per annum rate, excluding the losses which appear exceptional, and unlikely to be repeated for the reasons stated above. If 1.91 ha per annum was projected forward over the 18 year Plan Period this would give a loss rate of 34.38 ha. This rate is lower than the allowance provided in the buffer and displacement factor as detailed above, giving some flexibility for other unanticipated losses to 2038.