



# Follow up note regarding Warrington Local Plan Employment Session

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ON BEHALF OF LANGTREE  
PROPERTY PARTNERS LLP,  
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Iceni Projects Limited on behalf of LANGTREE PROPERTY  
PARTNERS LLP, March 2023

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## 1. INTRODUCTION

- I.1 This note follows on from the Langtree participation at the Warrington Local Plan Examination hearing session held on 13<sup>th</sup> July 2023. A number of key points are expanded upon herein that were discussed during the session.
- I.2 A key reference at the hearings was Langtree Main Modifications Consultation response ref MMC086 including Appendix 2 “Proof of Evidence of MATTHEW KINGHAN (for the Applicants) on NEED FOR EMPLOYMENT LAND PLANNING INSPECTORATE REFERENCE APP/M0655/V/22/331187”
- I.3 The development of evidence from MMC086 Appendix 2 is included herein.
- I.4 Key issues discussed and revisited here are:
- Total employment needs
  - Issues around losses monitoring and displacement
  - Office roles and worker patterns
  - Total jobs for Warrington

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## 2. KEY ISSUES

### Local Plan needs

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- 2.1 MMC086 Appendix 2 establishes the Langtree preferred position on needs at para 4.46. This is derived from a ten year net absorption model rather than the long run BE Group data. However the results are very similar. In particular we have a lower emphasis on offices. Our position is reiterated below.

**Table 2.1 Warrington Employment Land Needs 2020/21-38/39**

	10 year net absorption*	BE Group Margin based on gross completions**	Town centre replacement**	Total
Office	10.1	42.7	17.6	279.5
Industrial (small)	33.7			
Industrial (large)	176.3			
<b>Total</b>	<b>220.1</b>	<b>42.7</b>	<b>17.6</b>	<b>279.5</b>

Source: \*MMC086 Appendix 2 Table 4.8 \*\* Warrington EDNA 2021 (note this is also c20% of the 220.1 ha which is considered reasonable)

- 2.2 As per para 4.47 MMC086 Appendix 2 "...view this this 280 ha as a minimum in terms of future employment land provision, ensuring a strong contribution to sub regional requirement as well as local needs."
- 2.3 The reason that this is a minimum is as a roll forward it bakes in the last ten years low vacancy rate and ever rising rents. Therefore provision above this rate would be desirable to relieve market pressure.
- 2.4 As table 4.7 of MMC086 APP2 highlights, the last 10 years completions trend for Warrington would be much higher than the absorption trend.

### Densities

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- 2.5 At the hearing sessions and through representations there were discussions on appropriate densities.

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2.6 BE Group at the sessions maintained that 80 sqm / FTE is the most appropriate density for calculating jobs at Fiddlers Ferry and SEWEA. BE Group argued that the Warrington&Co data as presented in MMC086 Appendix 4 pdf page 262 (Socio-Economic Supporting Document, Amion Consulting) being 61 sqm per FTE is outdated. Amion come to the same conclusion on MMC086 Appendix 4 pdf pgs 263/264.

2.7 Mr Kinghan representing Langtree also argued that 80 sqm or above, with 95 sqm being the typical position for logistics developments, was appropriate based on changes in working patterns, that means the historic c60sqm is out of date.

### **Displacement – range of data**

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2.8 Employment land losses were discussed at the hearing. BE Group acknowledged this was not considered in the EDNA.

2.9 The displacement rate is relevant when considering the relationship with jobs change and employment land delivery discussed later.

2.10 During the hearing lunch recess research was undertaken by WBC and verbal references made to data but no data circulated. This is now included in CD80.

2.11 It is important to note that AMR monitoring is not the sole nor primary source for considering displacement, as government guidance (as discussed below) provides for a range of typical indicators.

2.12 Icenl has reviewed the AMR and CD80. We note the following table. This includes a range of losses / displacement.

**Table 2.2 Warrington AMR losses/gain stock age**

Year (ending March)	Gain	Loss (high)	Loss (low)	Notes
2015	61.3	1.1		
2016	25.8	70.4	19.1	Actual loss 70.4 but 51.4 being lost to residential use at Omega excluded. 19.1 remains as loss
2017	8.08	4.22		
2018	4.26	0.95		
2019	31.85	0.45		
2020	4.13	1.3		
2021	0	11.3	0	Loss was all at Omega
Average	<b>19.3</b>	<b>12.8</b>	<b>3.9</b>	
Ratio		<b>0.66</b>	<b>0.2</b>	For every 1 ha delivered, 0.66 has been lost under the 'high' scenario and 0.2 lost under the 'low' scenario. Displacement range 66%-20%

Source: CoStar March 2023

2.13 Icenis has looked at other data on displacement.

2.14 For the last 10 years of displacement Icenis reviewed using in MMC086 App 2 by looking at the ratio of stock change (VOA) vs completions (EDNA). This ratio is 56% displacement as below. We note that VOA records may differ from completions in terms of the lag between completions and registering stock for business rates (as well as plot ratio assumptions) but nonetheless the comparison is useful. Our data is represented here.

**Table 2.3 Warrington VOA vs AMR data 2011-2019 (industrial)**

	2011/12 – 2019/20 change	Source / note
VOA net change	+276,000 sqm = 70.7 ha @ 0.39 plot ratio	VOA NDR Industrial Floorspace Tables release 2021 Tab 4.1
EDNA gross change	+ 161 ha	BE Group Warrington EDNA 2021 Table 21 exc. Use Class E(g)(i)
Ratio	70.7:161=0.44	

Displacement rate	1-0.44=56%	For every 1 ha delivered only 0.44 was gained therefore 0.56 was lost
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- 2.15 Due to uncertainty in the data Icen in MMC App2 assume a displacement range of 40%-50%.
- 2.16 It is of note that 50% is the 'medium' recommended displacement rate in HCA Additionality Guide Fourth Edition 2014 Table 4.8, as replicated below, and 25% is considered low.

**4.3.6 Ready reckoners**

In the absence of specific local information the level of displacement can be assessed as follows:

Level	Displacement	Displacement effect
None	No other firms/demand affected	0%
Low	There are expected to be some displacement effects, although only to a limited extent	25%
Medium	About half of the activity would be displaced	50%
High	A high level of displacement is expected to arise	75%
Total	All of the activity generated will be displaced	100%

If the level of displacement was estimated to be low (i.e. 25%), then 75% of the outputs would be taken forward (i.e. 100% – 25%).

Source: HCA Additionality Guide Fourth Edition 2014 p30

- 2.17 There are other reasons to think that displacement may not be 'low'.
- 2.18 The Liverpool City Region Strategic Housing & Employment Market Assessment (SHELMA) 2017<sup>1</sup> para 11.3 notes that "an important component of demand for new-build large scale warehousing will arise from replacement of older outdated stock". Table 64 of the SHELMA notes that by 2043, 80% of existing stock will require replacement or 1,229,000 sqm. This compares to a growth component of 820,000 sqm (table 68). So the replacement element is higher than the growth element, the growth or 'job generating' component is 40% of the total so the displacement rate is 60%.

<sup>1</sup> <https://www.sefton.gov.uk/media/2813/final-report.pdf>



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- 2.19 The point is that displacement rates for industrial and warehousing units tend to be high. This is due to modern demands for power, high quality premises, that are larger, taller, located in the right places and ready for automation.
- 2.20 BE Group suggest that (EDNA para 7.13) “the bulk of Warrington’s stock of E(g)/B2/B8 premises is modern” without evidencing this statement.
- 2.21 Icen analysis of CoStar data suggests otherwise. Table 4.4 of MMC086 App2 indicates that much of stock is dated pre 1990s and will not realistically be fit for purpose by 2039. This accounts for 189 medium and large units of the 455 total or 42%. Many of the units built before 2000 will not be fit for purpose and this accounts for a far higher proportion.
- 2.22 Based on the range of evidence a ‘medium’ level of displacement appears appropriate.
- 2.23 We return to the relevance of displacement later.

### **Role of offices and office type jobs**

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- 2.24 The hearing session discussed the type and role of office jobs in Warrington.
- 2.25 Table 22 of the EDNA suggests that 74 ha of the future need should be offices based on the past trend, but only a supply of 1 ha is provided.
- 2.26 In many ways this underlines an issue with the over use of pre 2000 or even pre 2009 trend based analysis. There is no demand for 74 ha of standalone offices in Warrington by any measure. Icen refer back to the 10 ha arising from the net absorption model (table 21 above). It may also highlight an issue with the limited clear allocations for office space on existing sites, potential redevelopment sites or other new sites.
- 2.27 Turning to the forecasts, both Oxford and Cambridge see ‘Finance and business’ as an important driver, with the average between them for the plan period being 8,050 plus 500 for ICT.

2.28 At 12 sqm per job this equates to 96,600 sqm and 26.3 ha. Can this be right? In reality 100% of people in this sector never work in offices. ONS data for pre pandemic results reports that for the Professional services, Finance and ICT sectors, 23% of people work mainly at “Own home, Same grounds or building, Different places with home as a base”. That means that 77% usually work in the office. Table replicated below.

**Table 2.4 ONS data on home working pre pandemic (2018 weighted)**

	1 Own home	2 Same grounds or building	3 Different places with home as a base	4 Separate from home	5 Total	4 / 5
13 M Prof, scientific, technical activ.	322,302	18,404	322,823	1,854,705	2,518,234	74%
11 K Financial and insurance activities	66,131	2,966	66,671	1,140,241	1,276,009	89%
10 J Information and communication	200,507	7,951	161,832	983,880	1,354,170	73%
Average						77%

Source: *Summary of analysis: Numbers of homeworkers against Major Occupation & Industry, 2012-19* Data source: *Annual Population Survey (APS), Period: Jan-Dec 2012-19*

2.29 However Post pandemic office occupancy is now running at 40% - and steadily increasing - rather than c80% as reported by most monitors:

- <https://return.remitconsulting.com/resource-centre/34-news-release-latest-data-shows-uk-office-occupancy-reaching-new-pandemic-highs>
- <https://www.costar.com/article/1063782777/uk-office-occupancy-starts-2023-at-new-pandemic-high>
- <https://www.fmj.co.uk/office-occupancy-rates-hit-highest-level-since-the-end-of-lockdown/>

2.30 We don't know exactly how office occupancy will pan out but it seems reasonable to assume a lower rate of around 50% compared to pre pandemic. The implications of this for future new offices are unclear but we endeavour to test the relationship below.

2.31 Turning back to the forecasts for the 8,050 jobs noted above, this might realistically be generating a 50% demand ratio for space so the 26.3 ha x 50% = 13.2 ha which is near the 10 ha net absorption trend plus an element of margin argued by Icenl (table 2.1 herein). This would be a reasonable in not optimistic prospect for offices in Warrington. It also means 50% of the 8,550 or 4,275 working from home most of the time, and the same amount in the office.

2.32 Whether all this c10ha of offices is actually needed is also a question. At July 2023 CoStar reports the Central Warrington office vacancy rate as 7.2% and rising. Availability is 8.4%. The Warrington Fringe vacancy is 10.4% and rising, availability is 12.3%. Higher availability means that occupied space is being advertised and lease breaks are coming - more space will be vacant. So some of the future space needed for new jobs, if they materialise, might simply fill vacant space existing now.

### **Total jobs for Warrington – drawing facts together and updating MMC086**

2.33 At the hearing session Table 2 of CD67 was discussed. This is replicated below.

**Table 2 – Jobs Generated by Proposed Employment Land Allocations**

Proposed Allocation Site	Size, ha	Floorspace, sqm	Assumed Use Class (s) of Development (Jobs Density Applied)	Jobs Generated	Comments
Existing Supply	38.87	168,791	Multiple	3,870	Based on EDNA analysis of different sites
St Helens Omega Extension	31.80	124,020	B8 (One job per 80 sqm)	1,550	Assumes a strategic scheme, predominately comprising B8 warehousing comparable to past development at Omega Floorspace conversion at the standard developer ratio of 3,900 sqm/hectare
Fiddlers Ferry Brownfield Site	101.00	393,900	B8 (One job per 80 sqm)	4,924	Assumes a strategic scheme, predominately comprising B8 warehousing comparable to past development at Omega Floorspace conversion at the standard developer ratio of 3,900 sqm/hectare
SEWEA	136.92	533,988	B8 (One job per 80 sqm)	6,675	Assumes a strategic scheme, predominately comprising B8 warehousing comparable to past development at Omega Floorspace conversion at the standard developer ratio of 3,900 sqm/hectare
<b>Total Supply</b>	<b>308.58 (171.67 less SEWEA)</b>	<b>1,220,699 (686,711 less SEWEA)</b>	-	<b>17,019 (10,344 less SEWEA)</b>	

Source: BE Group, 2023

2.34 This inspector rightly wanted to understand what happens to the ‘non employment land jobs’.

2.35 This issue has been considered in MMC082 App2 section 5 but requires updating. The full analysis is not replicated here but the steps are:

- Replicate table 2 of CD67 (and consider a lower density for warehousing)
- Convert FTEs to jobs (See para of 5.4 of MMC082 App2)
- Apply displacement rates of 40% and 50%. All the analysis undertaken in MMC086 and expanded upon above suggests this is reasonable.
- Apply a multiplier to the jobs of 1.29 in line with the 2014 HCA Additionality Guide (and HM Treasury Green Book).
- Replicate the BE Group approach to working out jobs ‘not in employment land’ derived from EDNA tables 27&29 (see table 5.3 of MMC082 App2).

2.36 We however now see a ‘problem’ with the EDNA assumptions and table 5.3 because 100% of those of those in Finance and business cannot be in offices, as explained above. This also applies to ICT. There could be an extra 4,275 ‘not on employment land’. This is updated and set out below. The position is perhaps a ‘worst case scenario’ with the 50% of office workers ‘not in the office’.

**Table 2.5 Future Warrington total jobs derived from Oxford / Cambridge forecasts**

Sector	Forecast growth*	% in employment land **	Total in employment land	Total <u>not</u> in employment land
Agriculture, etc.	0	N/A	0	0
Mining and quarrying	0	N/A	0	0
Manufacturing	-1,600	100%	-1,600	0
Electricity, gas and water	-150	26%	-39	-111

Construction	900	26%	234	666
Distribution	500	48%	240	260
Transport and storage	400	48%	192	208
Accomm. and food	2,300	0%	0	2,300
ICT	500	50%	250	250
Financial and business	8,050	50%	4,025	4,025
Government	3,500	22%	770	2,730
Other	500	22%	110	390
Sub Total	14,900		4,182	10,718

Source: EDNA table 27\* and table 29\*\* (CD4.159)

\* mid point of Oxford and Cambridge forecasts

2.37 Looking at the ‘office type jobs’ arising in ICT and Finance & business (setting aside the Government services for which there is less certainty in terms of space needs) suggests 4,275 in employment land. This is marginally higher than is being provided for in the ‘existing supply’ of 3,870 in table 2 of CD67 above. However this underestimates the potential for some of these workers to be in the actual warehouses at SEWEA / Fiddlers Ferry with the collocation of office and warehouse space an increasingly commonplace development as is confirmed within CD81 *“developments in Warrington Borough have historically included sizable office elements and could do so again. Thus, the B2/B8 uses proposed in the Warrington Updated Proposed Submission Version Local Plan (Document SP1) have the potential to absorb a reasonable share of the forecast office jobs growth and office.”* Furthermore there is potential for recycling of existing space. Thus this misalignment is not considered an issue. Any issue arising should be dealt with through the council revisiting their allocations strategy or moreover their use and reuse of existing sites.

2.38 We now need to bring together the ‘employment land and non employment land jobs’. Firstly we revisit table 2 of CD67 because the SEWEA floorspace figures are incorrect since these were derived from a plot ratio and not the actual planning assessment (South East Warrington Employment Area Statement of Common

Ground between Langtree, Liberty and the Council (SG04) appended masterplan framework page 6 for Six56 and page 32 for Liberty).

**Table 2.6 Site supply – jobs supported (density ranges)**

Allocation	Size (ha)	Floorspace (sqm)	Use Class density (high)	Jobs [FTEs]	Use Class density (low)	Jobs [FTEs]	Comment
Existing supply	38.9	168,800	Various	3,870	Various	3,870	EDNA analysis
St Helens Omega extension	31.8	124,020	B8 (80 sqm / FTE)	1,550	B8 (95 sqm / FTE)	1,305	Warehousing – BE Group assumed 80 sqm / FTE for general warehousing, 95 sqm / FTE guidance for larger units
Fiddlers Ferry Brownfield Site	101.0	393,900	B8 (80 sqm / FTE)	4,924	B8 (95 sqm / FTE)	4,146	
SEWEA	136.9	464,425	B8 (80 sqm / FTE)	5,805	B8 (95 sqm / FTE)	4,889	
<b>Total supply</b>	<b>308.6</b>	<b>1,151,145</b>		<b>16,149</b>		<b>14,210</b>	

Source: Warrington EDNA 2021 / CD4.162 / HCA Density Guide / South East Warrington Employment Area Statement of Common Ground between Langtree, Liberty and the Council (SG04)

2.39 It is of note that the CD81 – Warrington BC note on jobs density – identifies that “Table 1 provides a breakdown of the floorspace in each main Omega building, sourced from Valuation Office data. This is then compared to the jobs numbers for each occupier ... The average jobs density is one job per 99 sqm”. As a result that 95 sqm sensitivity run above in table 2.6 is considered more realistic than the 80 sqm per job.

2.40 As a result we revisit the jobs, displacement and multiplier workings.

**Table 2.7 Site supply – jobs supported (net additional)**

	Gross FTEs	Gross jobs	Displacement (high/low)	Multiplier	Net additional jobs
Ratio	100%	÷ 90%	<b>x (1-0.5)</b>	x (1.3)	
Count (high density, high displacement)	16,149	17,943	8,972	11,573	11,573
Count (low density, high displacement)	14,210	15,789	7,894	10,184	10,184
Ratio	100%	÷ 90%	x (1-0.4)	x (1.3)	
Count (high density, low displacement)	16,149	17,943	10,766	13,888	13,888
Count (low density, low displacement)	14,210	15,789	9,473	12,221	12,221

Source: Own calculations

2.41 Finally we aggregate the site supply jobs and the non employment land jobs. We assume that half the multiplier jobs are in non employment land and that these are already captured in that growth element so we reduce the multiplier by half.

2.42 The table below brings these issues together.

**Table 2.8 Warrington future jobs: employment land & non employment land**

	Net additional jobs	Adjustment for non employment land multiplier jobs	Total non employment land jobs	Total jobs
Count (high density, high displacement)	11,573	-1,371	10,718	20,991
Count (low density, high displacement)	10,184	-1,204	10,718	19,757
Count (high density, low displacement)	13,888	-1,645	10,718	23,045
Count (low density, low displacement)	12,221	-1,444	10,718	21,565

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Source: Own calculations

2.43 Aggregating the total jobs is a net total gain of 19,757 – 23,045 jobs with the 20,991 – 23,045 being derived from the ‘high density’ 80 sqm per job assumptions and 21,565 to 19,757 if 95 sqm per FTE is assumed, that latter more probable.

2.44 This is now marginally above the labour supply generated by the standard method housing delivery programme of 18,300. Is this gap of 1,457 to 4,745 a problem? Icenl do not consider it a problem for the following reasons:

- 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. As a result 500-1000 unemployed persons could realistically and desirably be brought into employment.
- The UK has a productivity problem. It also has an ageing population and a constrained labour force in many areas. Businesses are investing in automation. Looking ahead 5-10 years of more it is realistic to think that the 95 sqm / FTE or even lower will be commonplace in larger developments.
- These assumptions give significant credence to the Oxford / Cambridge forecasts. However these are known to be fallible from the outset:
  - If we know that there is demand for Omega extension, SEWEA, Fiddlers Ferry and more creating over ten thousand of jobs in distribution and related sectors, then the forecasts are completely wrong. The forecasts suggest a combined Distribution +500 and Transport & storage +400 totalling +900. This flies in the face of recent change of +3,600 over last decade (see Langtree hearing statement AM5.04 Table 1) which would mean +6,480 for the 18 year plan period.
  - Conversely for Accommodation and food, there has little change in the sector 2009-2019 (see Langtree hearing statement AM5.04 Table 1) so what reason is there for +2,300 in the forecasts. This is due to the



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Cambridge forecast of +4,100 which is 'nonsensical' compared with the +500 from Oxford. Removing the questionable Accommodation and food growth upper end scenario alone reduces 1,800 jobs (from mid point 2,100 to 500) and effectively resolves the gap in labour demand and supply.

- Finally the forecasts are highly divorced on many sectors outlook including Financial and business. This time Oxford are high at 9,400 and Cambridge low at 6,700. If we drop from the mid point 8,050 to 6,700 of Cambridge we lose 1,350 workers. Again this alone effectively closes the gap at the lower end alone.
- Finally we note that Omega West (31.22ha) is located within St Helens Borough Council administrative area and whilst it is agreed that it will contribute to Warrington's employment needs, the Call In permission granted by the Secretary of State was specifically on the basis that a dedicated workers bus would be provided to provide access to the more deprived areas within St Helens to ensure that people who live in St Helens have access to jobs not just within the Omega West allocation but also within the rest of the Omega development. Such a dedicated workers bus to St Helens is not currently in place. Similarly Fiddlers Ferry lies immediately adjacent to the urban area of Widnes which is closer than the urban area of Warrington to it and hence it is entirely reasonable to assume that a proportion of the jobs created at Fiddlers Ferry will be filled by residents of Halton Borough. Residents of St Helens and Halton will be able to access both of these allocations via public transport. The SEWEA draft allocation lies in close proximity to the existing Appleton Thorn Trading Estate and the Langtree application includes provision for a new dedicated workers bus facility to link areas of deprivation within Warrington to the SEWEA and hence also to the existing businesses within the Appleton Thorn Trading Estate. Such a dedicated workers bus link does not currently exist. These forms of commuting provide positive planning benefits and further demonstrate that there is no planning justification to reduce the Warrington Employment Objectively Assessed Need due to concerns over commuting patterns.

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2.45 Given the above we consider there is little argument left to establish a significant issue with the jobs homes imbalance.

### **In conclusion**

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2.46 Inspector Kevin Ward wanted to explore many of the issues set out in this paper. In particular later in the hearing day the issue of employment land vs non employment land aggregation and the role of office workers. The Council and BE Group had little offer in this regard

2.47 These issues have been robustly and methodically worked through here in line with best practice and follow on from our work in MMC086App2.

2.48 Firstly there is unequivocal evidence for the need for at least 280 ha of employment land. We find the BE Group recommendations as reasonable regarding 316 ha.

2.49 Second looking at the job creation and homes, we see no justification for the Inspector's reduction in the allocations and the modifications arising.

2.50 Our work herein has looked at jobs and homes in detail. We find that from an 'uncritical' perspective, the combination of employment land supply jobs and non employment land jobs might lead to a small labour demand / supply imbalance of 1,457 to 4,745 with near the lower end being most realistic given council evidence on densities (CD81). However when we examine the details of the non employment land components derived from the forecasts we see issues and inconsistencies that cannot be ignored. There is significant downward flexibility in this component of at least 2,000 – 3,000 jobs. It is essential that this forms part of the judgement of jobs homes balance.

2.51 The reality is that there is a high level of demand for SEWEA and it supports growth for Warrington, the North West and the UK. This growth can be delivered within the balanced of labour supply Warrington can deliver and there is no evidence to the contrary.

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2.52 In Icení's view the Inspector has no justification nor evidence to continue to seek to remove the SEWEA allocation from the Local Plan.

2.53 The Plan allocation for SEWEA is in line with the Warrington Borough Council evidence base on need and all other market evidence. The allocation is sound and should stand.