

**Development Plan Representation – Warrington Borough
Council Local Plan Review**

Local Plan Preferred Development Option Regulation 18 Consultation

Employment Issues



I. Introduction

Spawforths have been instructed by Langtree Property Partners, First Panattoni and PGIM, who act on behalf of JLPPT Holdco 7 Ltd, a subsidiary of John Lewis Partnership Pension Trust (JLPPT), to submit representations to the proposed Preferred Development Option Regulation 18 Consultation (July 2017) and its supporting evidence base, which has been published for consultation from Tuesday 18 July 2017 ending on Friday 29 September 2017.

Langtree are seeking to promote land east of Appleton Thorn adjacent to Junction 20 of the M6 and Junction 9 of the M56 as a strategic employment site. This site will be referred to in this Representation as the M6/M56 Interchange, Warrington. It occupies a strategic location, ideally suited to logistics type development due to its proximity to the motorway network, its scale and topography.

We welcome the opportunity to engage in the Local Plan Review and look forward to being an active participant in further stages as the plan process evolves.

We welcome the need to review the current Local Plan Core Strategy given the results of the High Court Challenge and the emerging evidence recently prepared, which clearly sets out the Borough's growth ambitions and housing and employment needs to reflect this aspiration. This evidence base will need to underpin the emerging Local Plan Review.

We support these growth ambitions and overall intentions, underpinned by the housing and employment evidence base, aligned with job growth, which recognises the need to identify more housing and employment land in the Borough. However, we do have some concerns which we outline in this Representation, regarding the Council's development trajectory and phasing and the locations of this growth, which may result in a strategy which is not capable of delivering sufficient levels of employment and housing development to meet the objectively assessed employment and housing needs and growth ambitions of the Borough.

In our view, it is imperative that the evidence base used to inform the Local Plan Review applies the correct methodology and approach in respect of growth to ensure the Local Plan Review meets the four tests of soundness, set out in paragraph 182 of the Framework.

We trust that you will confirm that these representations are duly made and will give due consideration to these comments.

Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2. National Planning Policy Context and Tests of Soundness

The Government's core objectives as established through the National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 14 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The core planning principles are set out at paragraph 17. These include that planning should make every effort to proactively drive and support sustainable economic development to deliver the homes and businesses that the country needs. Plans should take account of market signals and allocate sufficient land to accommodate development within their area. The key focus throughout the Framework is to build a strong, competitive economy and to deliver a wide choice of high quality homes.

In relation to Local Plan formulation, paragraph 150 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.

In relation to the examination of Local Plans, paragraph 182 of the Framework sets out the tests of soundness and establishes that:

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

This document therefore considers the content of the Local Plan Review Preferred Options Document and supporting evidence base in light of this planning policy context. This representation comments on the questions detailed within the Consultation Document with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that Local Plan Review is made sound.

3. Response to Questions

We have set out our response to the questions proposed in the consultation document as follows:

Question 1: Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

We strongly support the Council's growth ambitions and the need over the 20 year plan period to allocated sufficient land to achieve high levels of growth, including 381 ha of employment land, which recognizes that land will need to be released from the Green Belt to deliver at least 9000 homes and 252 ha of new employment space.

This is underpinned by a range of evidence which provides a robust case for housing need and economic growth to be aligned.

Ensuring the correct level of housing has a direct bearing on economic growth. We consider that the Mid Mersey SHMA Update – Warrington Addendum (May 2017) provides an appropriate assessment of housing need in the Borough. The purpose of the 2017 SHMA Update Addendum was in response to matters raised during consultation on the Local Plan Review Scope and Contents Document and it now provides an update to the January 2016 SHMA. Importantly the Update now ensures the Borough's housing need and economic growth are aligned to inform the development needs set within the Preferred Options Document, which is important in the consideration of new employment sites in the Borough.

The SHMA Update revises the economy activity rates resulting in an OAN increasing from 839 homes per annum to 955 per annum which we support. The SHMA Update also considers the impact of the devolution proposal to create 31,000 jobs in the Borough from 2015 to 2040 (1240 jobs per annum), which would equate to 28,520 additional jobs over the SHMA period to 2037. This means that the housing requirement to support the level of job growth in the devolution bid increases from 984 homes per annum to 1,113 homes per annum. We support the proposed housing target set out in the Preferred Options Document and consider the alignment of the housing requirement with the LEP Strategic Economic Plan (SEP) is realistic and justified and underpinned by the Council's Economic Development Needs Study (ENDA) undertaken in October 2016, which remains the most

up to date evidence on employment needs in the Borough. This approach is consistent with paragraph 158 of the NPPF and PPG (ID 2a-018).

Projecting employment growth in Warrington in order to determine the employment land targets in the emerging plan is important. The Council's evidence set out in the 'Review of Warrington Employment Targets to 2040' outlines the 'pipeline projects' planned over the plan period and beyond. The SEP correctly embeds the devolution bid figure, rather than the Northern Powerhouse figure. We consider that SEP assumptions on growth are sound and based on an understanding of underlying trend growth and what can be achieved through a reasonable understanding of the development pipeline. We recognize logistics consistently drove growth in the Borough between 1998-2014 (Omega) and the forecasts set out in the evidence base forecast high jobs growth in distribution, transport and storage sectors. The Local Plan Preferred Options Document rightfully identifies land in appropriate locations to facilitate further growth in these sectors which we welcome.

In summary, we support the projects and programmes required to deliver Warrington New City. We also consider that the SEP targets for Warrington are sound and are appropriate to plan for economic growth in the emerging Plan. The Northern Powerhouse numbers are far from a reasonable forecast for local growth and there is insufficient evidence and a lack of certainty regarding the Northern Powerhouse programme at present, therefore we agree that this should not be used as a basis for forecasting employment growth figures in the Plan.

We consider that this level of evidence base is consistent with the requirements of the Framework, paragraphs 17, 158 - 161 and provides the most up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, taking full account of the relevant market and economic signals, required to inform the allocation of sufficient land to accommodate development within the area.

The Local Plan Preferred Options Document now translates this need into the land provision targets set out in the preferred options.

Question 2: Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

We broadly support the work undertaken by the Council in their Urban Capacity Statement which has been prepared to inform the Local Plan Preferred Options Document. The Urban Capacity Assessment draws on the EDNA, SHLAA and identifies the significant additional capacity that can be delivered through the regeneration plans and masterplanning work for the Town Centre, Warrington Waterfront and wider Inner Warrington. This produces a figure of 7,558 units over 20 years and an overall capacity of 15,429 homes over 20 years. In terms of employment land, the masterplanning work undertaken by the Council relating to the Town Centre, Inner Warrington (including Waterfront) has identified an additional 26.58 ha of employment land over the next 20 years, which confirms an overall capacity for 129.77 ha of employment land over the next 20 years.

The Preferred Options Document does place considerable emphasis on maximizing development within the existing urban area in addition to Green Belt release. Whilst we support the principle of this approach, the Council need to be satisfied that the levels of delivery within the urban area set out in the Preferred Options Local Plan Document (particularly in the first 10 years of the plan period) are achievable. We are aware of a number of Waterfront sites which are reliant on significant infrastructure investment and Town Centre sites which are currently occupied by alternative uses. The deliverability of some of these sites within the timescales set out raises doubts over the current trajectories set out in the urban area, and the ability to meet the current housing requirement over the plan period set out in the Plan. Despite the Council's intention to maximize the capacity of the existing urban area, it is abundantly clear that if Warrington is to meet the development needs arising from its growth aspirations, it can only do this through the release of Green Belt land to release a minimum of 8,791 homes and 251 ha of employment land. If land cannot be delivered within the urban area based on the trajectories set out in the Preferred Options Document, then we consider that land currently identified as safeguarded land should be allocated for further housing and employment to ensure the plan is made sound.

In terms of the assumptions made by the Council in calculating their housing and employment land requirements we would like to comment as follows:

The Council makes cursory reference to the Fiddlers Ferry Power Station, which is currently operational, coming forward as a major brownfield development site in the plan period. The consultation document does not currently state whether this would come forward as an employment or residential site or both. With such uncertainty regarding its closure and its deliverability as a possible development site it would be wrong to make any allowances for this site as either an allocated housing or employment site or apply sufficient 'flexibility in the land supply' in the emerging Plan. The Fiddlers Ferry site does not have the locational characteristics or offer the appropriate strategic location required to become a strategic employment site in the Borough. It would be inappropriate to consider it as a logistics site as it is not well related to the strategic highway network.

Question 3: Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

We support the Council's growth aspirations set in the Preferred Options Document which can only be met with the release of Green Belt land to release a minimum of 8,791 homes and 251 ha of employment land, which is set out in Table 1 and Table 2 of the Preferred Options Document.

We also support the principle of safeguarded land within the Preferred Options Document. In order to be consistent with the NPPF and ensure safeguarded land will meet the longer term development needs stretching well beyond the plan period, the Council should give consideration to identifying sufficient safeguarded land to match the proposed plan period of 20 years. This would provide certainty for all stakeholders in terms of likely growth locations beyond the end of the plan period to ensure that this plan is justified and positively prepared in accordance with paragraph 182 of the NPPF.

We have already expressed our concern regarding any inclusion of the Fiddlers Ferry site, as a substitute for any of the current Green Belt or safeguarded land required for release.

The Preferred Options Document paragraph 4.20 states that sufficient safeguarded land will be identified to meet development needs 10 years beyond the plan period, however Table 3 states a 9 year requirement, based on the OAN at a density of 30 dph and 75% net developable area. The reasoning for using 9 years (rather than 10) is that 15 years can be made up by including the 5% flexibility/buffer, which is equivalent to 1 years supply and the 20% buffer allocated for employment land, which would provide a further 5 years. When

measured against the OAN, the Council considers this provides 15 years supply. If the time frame is 15 years we would question again why it should not just mirror the plan period. Furthermore, if the 5% housing buffer and 20% employment buffer are used to ensure housing and employment land requirements are met in the plan period, they will not also be available if required during the plan period for future development which is the intention of safeguarded land.

Paragraph 4.24 of the Preferred Options Document identifies a similar urban area to Green Belt split (64% to 36%) for safeguarded land beyond the plan period to the total housing requirement ratio. For employment 29% is within the existing urban area and 71% is proposed on Green Belt land. The Preferred Options Document also makes further references to the Fiddlers Ferry site, which if made available could change the safeguarded land required figures again, given the delivery of this site will maximize the development of the urban area. The availability and deliverability of this site has not been justified by any level of evidence base that we are aware of consistent with the requirements of the tests of soundness set out in paragraph 182 of the NPPF. If this site within the urban area was identified in the plan and not delivered it would put further reliance upon safeguarded land outside the urban area.

We acknowledge that the Council are only consulting on a Preferred Options stage, however we expect that further consultation stages, including the Draft Local Plan should include a specific policy with triggers to identify when the safeguarded land would be released through a plan review.

We broadly support the location of safeguarded employment land identified in the Garden City Suburb illustrated in the South Warrington Urban Extension Development Framework, north of Knutsford Road, which is a logical extension to this key growth area south of the Borough and creates a new long term defensible boundary to the Green Belt created by the M6 and M56. The preferred locations for safeguarded land and the extent of these areas will be addressed in further comments to questions pertaining to the preferred development options.

We support the extent of Green Belt land in the south east of the Borough which needs to be released to meet the Council's growth aspirations set out in the Preferred Options Document.

The Green Belt Assessment Final Report (October 2016) and Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites (May 2017) maintain that land parcels (site references: R18/106, R18/110, R18/112, R18/114) allocated for residential and employment development as part of the Garden City Suburb Development Option make weaker contributions to the purposes of the Green Belt resulting in a ‘moderate contribution’ scoring within the Assessment. We agree with the sentiments of this Assessment and maintain that the release of the land required to deliver the Garden City Suburb would promote the original principles of the New Town Agenda and historic context of the Green Belt which focused on outward expansion to the south and south east of Warrington.

The Garden City Suburb is within a wide gap between the Warrington urban area and Lymm which is already separated by the M6; therefore it does not make any significant contribution to preventing towns from merging (purpose 2). The land parcels make a weak contribution to purpose 3, which recognizes that the M56 and M6 provide more durable boundaries which would prevent encroachment beyond the parcels if this land was to be released from the Green Belt. The land makes a weak contribution to purpose 4, given there is a large separation between the Warrington Parish Church and the land and it provides a moderate contribution to purpose 5 with a small percentage of brownfield land which assists in urban regeneration. We disagree with the Arup’s Site Assessment of the land parcels which are identified as safeguarded land, north of Knutsford Road, which states that these make a strong contribution to the Green Belt in this location. We consider that this parcel makes a weaker contribution to the Green Belt for the reasons expressed above.

The Garden City Suburb Development Option represents the most sustainable and deliverable option to achieve housing and economic growth consistent with paragraph 84 of the NPPF and its current Green Belt designation and existing boundaries should not be a constraint to identifying this land for release. This option, including the safeguarded land maintains a careful balance between minimizing impact on the openness of the Green Belt with the need for sustainable development. It is also entirely appropriate in our view to balance the functions of the Green Belt with the need to allocate more land for development.

The Green Belt Assessment and identification of land for Green Belt release should place more emphasis on meeting identified development requirements and sustainable patterns of

development, in accordance with the policies of the NPPF; balancing these requirements against the existing roles of the Green Belt; considering ways in which development can mitigate the loss of open areas and enhance the remaining parts of the Green Belt through landscaping; and forming new Green Belt boundaries that have a realistic prospect of enduring beyond the next plan review. We consider the current Garden City Suburb Concept adopts this approach identifying appropriate new Green Belt boundaries and appropriate levels of open space, including a Country Park to mitigate the loss of other areas of green space.

Question 4: Do you agree with the new Local Plan Objectives?

We broadly support the strategic objectives of the Local Plan which reflect the Council's New City development aspirations, confirming the level of housing and economic growth, infrastructure necessary and Green Belt release required to meet these growth targets in a sustainable manner.

If the strategic objectives are met through policies and land allocations in the emerging Plan, it will provide a comprehensive plan for Warrington with new sustainable communities, appropriate in scale and location to unlock the necessary strategic infrastructure to support growth required. Without a comprehensive planned solution to meet this level of growth, development and infrastructure will be delivered piecemeal putting additional pressure on existing infrastructure.

Question 5: Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

The Council has correctly identified and assessed a number of high level spatial options, through Stage 3 of their work towards a Preferred Option set out in the Consultation Document drawing on area profiles and growth scenarios for individual parts of the Borough, which have been assessed through a SA/SEA Report. We have reviewed the settlement profile for South Warrington (including Grappenhall and Appleton Thorn) and strongly support the fourth growth scenario option which seeks to provide a minimum of 6000 homes as part of a New Garden City Suburb which also recognizes the major employment site proposed at the junction of the M6 and M56.

Following an assessment of growth scenarios for each area profile, the Council identified three high level options for the spatial distribution of new development. We recognize there are merits to each broad spatial option (particularly option 1 and 2) which all contribute to the delivery of Warrington New City, with managed Green Belt release. We support the principle of the Council's preferred option 2 which recommends the majority of Green Belt release adjacent to the urban areas with incremental growth in outlying settlements. The scale of growth would be in-line with the devolution bid, with a total requirement of 24,220 dwellings over the plan period; 8791 of which would need to be delivered on Green Belt land.

Question 6: Do you have any comments to make about how we've assessed different options for the main development locations?

The options for the main development locations (Stage 4 of the Preferred Options Local Plan process) identifies five main development locations.

We support the stage 4 assessment of the main development location which has been assessed against the Plan Objectives and has been subject of a Sustainability Appraisal (SA).

We support the Council's preferred Option 2 – a Garden City Suburb of approximately 6,000 homes and an urban extension to the south west of Warrington, which performs well against the strategic Plan Objectives and when tested through SA/SEA. Notwithstanding this general level of support for this Option, we consider there is also merit in Option 1 as we are concerned over the delivery of the Western Link which is imperative to deliver the South West urban extension area. We are also concerned that the South West urban extension has significant conflict with the objectives and purposes of the Green Belt given the strong performance of the Green Belt in the western part of the Borough, both at General Area and individual parcel / development site level. These are all concerns raised through the Council's own SA Report.

The Garden City Suburb development concept and its safeguarded land have less impact on the Green Belt and the Green Belt Assessment confirms the Garden City Suburb land performs weaker when assessed against the purposes of the Green Belt with the M6/M56 providing a new defensible boundary to the Green Belt which will endure.

Further comments on the Garden City Suburb development concept and south west urban extension will be made under questions 11 and 12 and will refer to respective Framework

Plan Documents prepared by AECOM on behalf of the Council which develops each concept in further detail.

Question 7: Do you agree with our Preferred Development Option for meeting Warrington’s future development needs?

We support the Preferred Option and the particular emphasis on the Garden City Suburb to deliver the scale of growth required which in turn aids delivery of the necessary strategic infrastructure.

In terms of the employment development trajectory set out in the Preferred Options Local Plan, we consider that the whole of the Langtree land interests (96 ha) promoted for employment development within the Garden City suburb on land off Grappenhall Lane can all be delivered within the first five years of the employment development trajectory. Further justification for this approach is provided in response to Question 11.

Question 8: Do you have any comments to make about our Preferred Development Options for the City Centre?

We have no comments in response to this question.

Question 9: Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

We support the Council’s focus within the Preferred Options Document to follow the same approach to the wider urban area to that set out in the adopted Local Plan Core Strategy, with Birchwood, Omega and Woolston continuing as strategic employment locations and to deliver the programme of infrastructure improvements to the road and public transport network. We support the principle of this approach which demonstrates consolidation of employment in existing urban areas in addition to proposed new strategic employment sites at key sustainable locations, as proposed as part of the South Warrington Urban Extension / Garden City Suburb.

Question 10: Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

We have no comments in response to this question.

Question 11: Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

We support the Warrington Garden City Suburb concept, including the general principles of this sustainable urban extension and the extent of land required, which will deliver a significant part of Warrington's overall employment and housing requirement and need over the plan period. This will deliver 7,274 houses (around 6,324 of these from land currently within the Green Belt (based on the Council's development trajectory) and 116.80 ha of new employment space.

It is clear that to deliver this level of development within the Borough, this will require incursion into the Green Belt. This location to the south east of the Warrington urban area has been assessed as part of the Council's Green Belt Assessment, which confirms that large areas of this land currently only make a moderate / weak contribution to the five purposes of the Green Belt and the new proposed Green Belt boundaries will provide a more permanent defensible boundary which will endure. A detailed appraisal of the Green Belt Assessment and the five purposes of the Green Belt in the context of this development option is provided in our response to Question 3.

Langtree has significant land interests in the south east of Warrington on the land which comprises part of the Warrington Garden City Suburb. We would welcome the opportunity to work in collaboration with the Council and other key landowners to evolve the detail of the development concept and masterplan contained within the Local Plan Preferred Options Document and South Warrington Urban Extension Framework Plan prepared by AECOM on behalf of the Council.

This will enable the Council to continue to evolve the development principles of this urban extension consistent with good practice for masterplanning and delivering garden city suburbs, built on a cogent planning case and a development trajectory which is deliverable and based on market realities to ensure that the urban extension reaches its full development potential. It is imperative that the necessary infrastructure is in place to deliver sustainable levels of growth and equally that sufficient land is made available to help fund this infrastructure.

We support the scale and location of the strategic employment allocation identified with the Garden City Suburb Concept referenced in the Council's Local Plan Preferred Options

Local Plan and supporting Framework Plan. The location of this site is also supported by the Council evidence base in the form of the Economic Development Needs Study (EDNA) (October 2016) undertaken on by Mickledore & BE Group. This Study recognises the significant locational advantages to providing greater employment opportunities in the south of the Borough, particularly to meet these locational requirements for B8 users, given the links to the Manchester-North Wales Corridor.

The site is strategically located midway between Liverpool and Manchester and within 10 miles of Manchester Airport on the M56 motorway and presents an excellent opportunity to become a major Northwest logistics location. The site has the potential to deliver up to 3 million sq. ft. of high quality logistics floor space and become a major employment site for the Borough of Warrington, replacing the successful Omega site to the north of the Borough.

There are certain drivers which dictate the locational requirements for strategic employment sites, in particular B8/Logistics operators. These locational characteristics and drivers to meet the need identified by the Council cannot currently be met at any other location within the Borough. The site is a flat and expansive with no topographic constraints. It is accessible to the supporting supply chain and it will be close to an established employment area and an area of population growth, given it forms part of a Garden City Suburb in which 6000 additional houses are proposed. The land is also readily available and is under the control of willing landowners. All these attributes are key drivers for businesses when making decisions on locations for new employment space, in particular logistics operators. It is logical therefore for employment land to be allocated in locations which are attractive to the employment market to continue the success in the Borough provided by Omega.

This site is therefore the most suitable and has all these attributes and locational requirements of a B8/Logistics operator and lies within one of the UK's most efficient locations for this sector, in close proximity to the strategic motorway network and the M56/M6 Interchange.

The Economic Development Needs Study (EDNA) (October 2016) undertaken by Mickledore & BE Group also recognizes the positive locational benefits of this site and the surrounding area for B8 users and that future B8 land allocations should look to build on

these established locations in and around this M56/M6 corridor for logistics use. This Study also confirms there is market interest and support for new strategic site(s) along the M56 Corridor.

We have instructed commercial agents Jones Long LaSalle (JLL) to advise on the North West industrial market and the merits of the site as an industrial and logistics location in both a local and regional context. This confirms their support for this site and confirmation that this site is a suitable location benefiting from excellent national motorway links and is the optimal size to accommodate local and regional large scale industrial and logistics operators. See Appendix I for JLL's supporting statement in support of the sites identification as an employment allocation in the Preferred Options Local Plan.

A robust Green Belt review and Assessment must balance maintaining the openness of Green Belt areas with the need for sustainable development. We consider the allocation of this site for employment use as part of the wider Garden City Suburb has provided an appropriate balance of the functions of the Green Belt with the need to allocate land for development in suitable and sustainable locations for development to meet the Council's employment and housing needs.

Whilst we support the broad concept of the Warrington Garden City Suburb as a preferred development option we have a number of comments regarding the phasing of the employment development which is provided in the South Warrington Urban Extension Framework Plan prepared by AECOM on behalf of the Council. We also seek further clarification as to the status of this Framework as it is unclear whether this forms part of the Regulation 18 Consultation Document or whether this is supporting evidence base?

We support the amount of employment development identified for delivery in this development option, however we object to the trajectory set out in Table 20 of the Preferred Options Local Plan Document and the Phasing Plan in the (SWUE) Framework Plan. We consider that more employment land can be made available within the first five years than is currently identified in the trajectory.

We do not consider that it is appropriate to phase the release of the employment land. Large scale employment schemes require significant investment in infrastructure and hence the developers of such schemes need the certainty that in making such investment decisions,

they can develop out a site in response to market requirements rather than being fettered by any planning restrictions on phasing.

The South Warrington Urban Extension (SWUE) Framework Plan (page 36) indicates that the initial phase of the proposed strategic road planned in years 0-5, known as the 'Howshoots Link Road' connecting the western end of Grappenhall Lane to the eastern end of Witherwin Avenue will only be necessary to help deliver residential development on land currently identified as Green Belt and not employment development. On this basis there should be no restrictions placed on the delivery of any employment land currently identified as Green Belt land in the first five years. The development trajectory and phasing plan currently only proposes 22 ha of employment land in the first phase (years 0-5). This only includes land served from Barley Castle Lane, which puts increased pressure on the highway network, given this additional traffic will use the Grappenhall Lane / Broad Lane roundabout to access the site from the M6 (junction 20) and M56 (junction 9).

The whole of the proposed strategic employment land at M6/M56 Interchange, Warrington, is capable of being delivered in the first five years of the plan period to take advantage of its strategic location. This will take the majority of the traffic from the site via Grappenhall Lane, onto the motorway via the M6/M56 Interchange, without putting significant increased traffic on existing highway junctions. The completion of the first phase of the 'Howshoots Link Road' at the Grappenhall Lane / Broad Lane roundabout is therefore not relevant or required for the employment development.

Our site is currently phased to be delivered in years 6-10 (Phase 2 - 30.3 ha) and the remaining land in years 11-15 (45.9 ha). This is entirely inappropriate and no such planning restrictions should be placed on this site.

In summary, the delivery of this strategic employment site should not be unduly restricted by a rigid phasing strategy and should be come forward in response to market forces consistent with paragraph 21 of the NPPF.

On this basis, we consider that this employment trajectory and phasing strategy should be amended to allow all employment land to come forward in response to market requirements. We accept that some localized highway improvements may be necessary to accommodate the employment development but at present there has currently been no

Multi-Modal Transport Model to enable the Council to understand local and Borough wide transport impacts arising from all the development planned. Only once this is completed will the Council be able to confirm the infrastructure required to support the employment development.

We are undertaking a Transport Assessment at present to inform the need for any highway improvements and would be willing to work collaboratively with the Council to agree such improvements. Subject to delivery of any such improvements it is imperative that the development can react to market forces and is responsive to occupier demand and employment need.

We consider that the current level of detail is too prescribed for this stage of the Plan process. We would expect any detail associated with the trajectory to be developed at Draft Plan stage with the development of detailed policies.

Notwithstanding the comments and objections regarding the phasing of this employment land, the broad design principles associated with the concept are supported.

We support the broad disposition of uses within the development concept, illustrated in Figure 7 of the Local Plan Preferred Options Document and the conceptual approach underpinned by good practice development principles and guidance on Garden City design which seeks to encourage low density sustainable urban extensions embedded in a strong landscape framework which balances built development with greenspace.

We agree with the broad location and amount of safeguarded employment land between Cliff Lane and the existing defensible boundary formed by the M6 road corridor. The green corridor created alongside Massey Brook illustrated on the Council's Framework Plan acts as an important view cone which provides an open aspect and clear longer distance views through the proposed employment site, which protects the landscape and visual setting of the Bradley Hall Moat Scheduled Ancient Monument (SAM). The masterplan and parameters plan that we are preparing for the strategic employment site has had regard to this north-south axis and visual and landscaped corridor and seeks to retain the setting of this SAM heritage asset within the proposals for the site, allowing the sense of historic openness to remain where appropriate, to limit visual intrusion. This Masterplan appended to these representations illustrates the relationship this site has with the wider Garden City

Suburb and has regard to the design principles currently advocated on the Council's Concept Approach Masterplan Figure 3.5 of the Framework Plan. See Appendix 2.

In summary, we consider that further detailed highways assessment needs to be undertaken to support the Council with the next stage of their plan. This will inform a revised development trajectory for delivery of the employment land in the Garden City Suburb. This should form part of a criteria based policy in the Draft Plan which relates to the Garden City Suburb strategic urban extension site, which requires the land to be developed in accordance with a detailed masterplan and any triggers if necessary regarding the delivery of important infrastructure. Each planning application or the delivery of each development area will need to be supported by a Transport Assessment which will confirm the impact of this level of development on the highway network and where necessary any mitigation or highway improvements which will be required to support this level of development.

Question 12: Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

We have made further representations in response to Question 12 as part of a separate submission.

Question 13: Do you have any comments to make about our Preferred Development Option for the development in the Outlying Settlements?

We have made further representations in response to Question 13 as part of a separate submission.

Question 14: Do you agree with our approach to providing new employment land?

We support the approach to providing new employment land in the Borough to meet the need to provide an employment land target of 381 ha over the next 20 years. The Plan rightly seeks to maximize the capacity within the existing urban area with a supply of 130 ha in existing areas, however there is still a requirement to provide 251 ha on land currently within the Green Belt.

We support the broad locations for future employment development identified in table 9 of the Preferred Options Local Plan. This has had regard to existing employment sites and their extension including land adjacent to Omega, the expansion of Port Warrington, already identified within the Core Strategy, but also draws on the qualitative assessment of preferred employment locations in the Council's EDNA against the locational requirements for specific B2/B8 distribution uses. This confirms a specific locational requirement for these uses in close proximity to a strategic road network, on a scale which cannot be met at Omega and Woolston Grange.

Land at the M6 Junction 20 / M56 junction 9 performs strongly against criteria set out in the EDNA and recognizes the need to align job growth and employment with a new strategic employment site which is also a key component of the wider Garden City Suburb concept forming a sustainable mixed use community. We support the preferred location of employment land to be safeguarded in the plan, which ensures the M56 and M6 now provide long term durable and defensible Green Belt boundaries.

Question 15: Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

No further comments to make.

Appendix I – JLL Supporting Statement



25 September 2017

Mr [REDACTED]
Spawforths
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Wakefield
WF3 2AB

Dear Mr [REDACTED]

Land off Cliff Lane, Warrington- A site for Logistics and Distribution

Introduction

Many thanks for giving us the opportunity to provide our thoughts and recommendations for the strategic land holding off Cliff Lane, Warrington in support of representations made to Warrington Borough Council. This report supports its recent identification as a strategic employment allocation in the Council's emerging Preferred Options Local Plan Regulation 18 Consultation document and considers the North West industrial market and the merits of the site as an industrial and logistics location in both a local and regional context.

Executive Summary

- Significant take up over the past 3 years and on-going high occupational demand has meant the steady uptake of readily available development sites and existing buildings.
- Large occupiers are now struggling to find over ready sites to accommodate their expansion within Cheshire.
- The growing imbalance between a chronic lack of supply and high demand is also affecting small to medium sized occupiers and hindering their growth plans which stifles potential employment growth.
- High quality industrial, advanced manufacturing and logistics uses generate significant long term employment.
- The additional benefit would see manufacturing/ logistics operators act as a catalyst for urban regeneration being integral to creating a well-balanced community with a mix of complimentary uses (residential, retail, educational and amenity).
- The Cliff Lane site has the ability of creating the critical mass required to attract complimentary businesses.

North West Market Overview

The main driver of the national industrial and logistics market over recent years has been the growth of the e-commerce sector. The need to satisfy consumer demand across multiple channels is forcing retailers to ask more of their supply chains which is having a consequential effect on the sector. E-commerce in the UK is not just growing rapidly, but it is evolving as retailers have to cope with a more extensive product variety, higher inventory, larger outbound delivery movements and increased reverse logistics (returns). Parcel couriers have expanded their delivery networks to meet consumer's demands for ever more convenient delivery times and traditional retailers continue to invest in 'click and collect' and 'ship from store'.

Over the last 18 months the majority of major industrial and logistics transactions have been with ecommerce operators:

- Amazon have acquired five buildings totalling 1,080,000 sq. ft. - 110,000 sq. ft. in Knowsley, 168,000 sq. ft. in Leyland, 175,000 sq. ft. in Trafford Park, 271,000 sq. ft. at Manchester Airport, 350,000 sq. ft. at Omega Warrington and 360,000 sq. ft. unit at Logistics North, with further requirements in North East Manchester (100,000 sq. ft.), Chester/Deeside/Ellesmere Port (100,000 sq. ft.).

- The Hut Group acquired a new 685,000 sq. ft. facility at Omega.
- Missguided Plc have taken a purpose built 250,000 sq. ft. distribution facility in Trafford Park which is operated by their third party logistics provider, XPO Logistics.
- Boohoo have extended their existing facility in Burnley by 150,000 sq. ft. to accommodate future growth and have submitted a planning application for a further 160,000 sq. ft. on an adjacent site and are understood to have a requirement for an additional 700,000 sq. ft.
- B&M Bargains acquired 390,000 sq. ft. and 460,000 sq. ft. at Runcorn and Middlewich.
- AO.com acquired the 380,000 sq. ft. former Tesco Direct facility on Weston Road in Crewe.

Whilst e-commerce has been the main driver for the logistics market over the last 18 months, there have been a number of other significant deals involving manufacturers and specialist products providers in the last 12 months including, but not limited to:

- Domino Printers (170,000 sq. ft. Design and Build at Senate Business Park Liverpool).
- Nice Pak Wet Wipes (400,000 sq. ft. at Westwood Park, Wigan).
- Domino's Pizza (117,000 sq. ft. at Omega).
- Alstom self-building Phase 1 of a projected 600,000 sq. ft. train manufacturing facility at HBC Fields, Widnes.
- GA Pet Food Partners (185,000 sq. ft. at Revolution Park, Chorley).
- SIG (140,000 sq. ft. at Trafford Point, Trafford Park).
- Accrol Papers (180,000 sq. ft. at Lancs Business Park and 390,000 sq. ft. at the former Matalan facility, Skelmersdale).

More recently in the first half of 2017, there was approximately 1.65 million sq ft of take up;

- M58 Distribution Centre, Skelmersdale (390,000 sq ft), let to Accrol Papers
- Aquila 120, Huyton (120,000 sq ft) let to Grupo Antolin
- M1 Heywood (101,000 sq ft) let to Kleenzee
- Logistics North 225 (225,000 sq ft) let to Whistl
- JD Sports Design & Build extension at Kingsway, Rochdale (366,000 sq ft).
- Fusion 62, Stakehill Industrial Estate (150,000 sq ft) let to Foot Asylum
- Target 62, Stakehill Industrial Estate (150,000 sq ft) let to Toolstation
- R150, Winsford (150,000 sq ft) let to Henkel

Market Dynamics – Existing Supply

Despite the construction of over 3m sq. ft. of speculative distribution space in the North West market over the last two years, there continues to be a significant shortage of supply of Grade A units in all locations across the region. Approximately 2.9m sq. ft. of space was acquired in 2016 and as a result of lack of readily available development sites, we do not expect to see significantly more in the short to medium term putting further pressure on supply / demand dynamics. To date, all speculative units have been let during the first 12 months post construction.

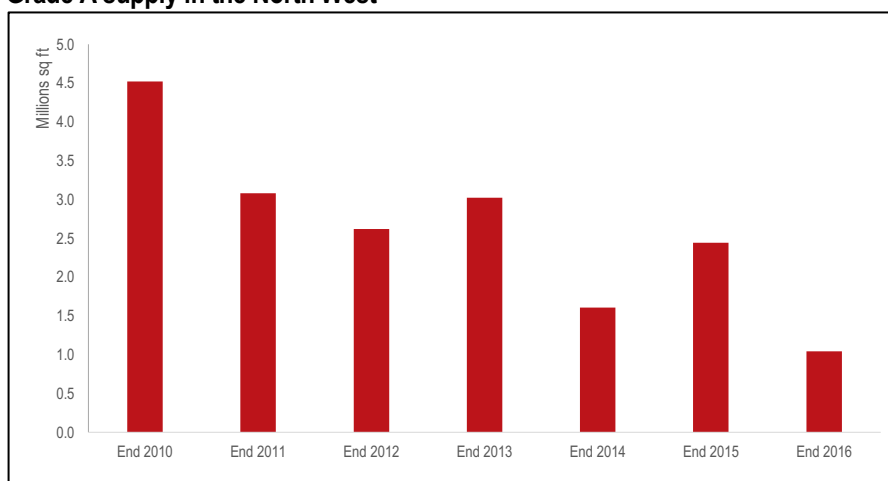
The schedule below highlights the current supply of Grade A warehouses (150,000 sq. ft.+) that have been recently completed and remain available, as you can see none are located in Cheshire further highlighting the severe lack of supply in the area.

Address	Size	Terms	Comments
Heywood Distribution Park Heywood	148,000 sq. ft.	Leasehold £6.25	<ul style="list-style-type: none"> Harbert Asset Management / XLB
Kingsway Business Park Rochdale	216,000 sq. ft.	Leasehold £5.75	<ul style="list-style-type: none"> Wilson Bowden/Standard Life
Logistics North Bolton	175,000 sq. ft.	Leasehold £6.25	<ul style="list-style-type: none"> Harworth Estates / M&G Investments
L175 Liverpool International Business Park Speke	175,000 sq. ft.	Leasehold £5.50	<ul style="list-style-type: none"> Peel Logistics / Macquarie

Supply

At the end of December 2016 there was approximately 1 million sq. ft. of total Grade A floor space available in the North West which accounted for approximately 8% of national supply. Supply at the end of 2016 was approximately 57% lower than the end of 2015 (2.4 million sq. ft).

Grade A supply in the North West



Source: JLL

There is currently no floor space over 110,000 sq ft speculatively under construction in the North West and very little floor space in the pipeline for further speculative development this year which will keep supply levels low.

All of the above confirms that there is a significant imbalance between supply and demand, as increasing numbers of businesses seek sites for distribution and warehouse facilities in strategic locations, with easy access to the region's major transport networks.

Time and again the delivery to the market place of oven ready fully serviced sites has delivered spectacular results in enhanced take up. Examples include:

- Logistics North, Bolton;
- Omega Warrington;
- Kingsway Business Park, Rochdale;
- Matrix and Revolution Park at Leyland/Chorley;
- Statham Lane, Skelmersdale;
- Midpoint 18, Middlewich; and
- Liverpool International Business Park, Speke.

It is interesting to note that there have been a number of planning applications for large sites to the North near to Junction 23 of the M6 motorway at Haydock, notably the former Parkside Colliery site in Newton-Le-Willows. Peel Logistics have lodged a planning application to bring the 300 acre site they own immediately adjacent to the M6/A580 junction. 50 acres at Cuerden, Bamber Bridge whilst Bericote have been successful in obtaining planning for a 50 acre site at Florida Farm, Haydock.

The Site – Cliff Lane

The site is situated in Warrington Borough close to the M56/M6 intersection. The site extends to a net developable area of approximately 126 acres (51.99ha). The site is currently used for agricultural purposes and is designated as Green Belt land.

Attributes

- Large site area capable of extensive design & build options up to 1,000,000 sq ft.
- Proximity to the Stretton and Appleton Thorn Industrial Estates, two well established industrial and logistics business locations.
- This size and scale of the site makes it not only important on a local level but also within context of the wider North West industrial market.
- Adjacent to junction 20 of the M6 motorway enabling it to benefit from existing road infrastructure.

Restrictions

- Not yet designated for employment use

Target Market/Delivery – Occupational Demand

Cliff Lane can offer a large scale logistics and manufacturing solution. It is capable of responding to the needs from operators looking for units up to 1,000,000 sq. ft.

Easily accessible to wider motorway network with direct access to Junction 20 of the M6 motorway providing easy access to the regional motorway network as well as the key ports in England.

We consider the following to largely encompass the target audience:

- National and regional logistics / distribution companies (3PLS)
- All national retailers and e-retailers
- National parcel delivery companies
- Major occupiers already located within the region
- Major national and regional manufacturers
- JLR Supply chain

Delivery

We believe the site needs to be made 'oven ready' to attract suitable occupiers.

- There is a 'drive / commercial imperative' to provide same day delivery as opposed to next day delivery.
- Key businesses are seeking unit sizes of in excess of 100,000 sq. ft. in size.
- The site has to be level.
- The site has to be located in close proximity to social economic employees with a high proportion of process, plant machine operatives and elementary occupations.
- The site needs to be located within a 1 to 10 miles distance of key motorway junctions.

The delivery to the market place of 'oven ready' fully serviced sites has delivered spectacular results and enhanced take up in the area. Notable recent examples include the following occupiers who have had or who currently have live requirements looking in Cheshire which if Cliff Lane had been deliverable at that point in time would have requested design and build terms.

2015/2016

- B&M Bargains - Acquired 460,000 sq ft in Middlewich
- Amazon – 350,000 sq ft at Omega, Warrington
- Dunelm - 500,000 sq ft prelet at Sideway, Stoke
- Whistl - 225,000 sq ft at Logistics North, Bolton
- Lidl- 950,000 sq dt RDC – Logistics North, Bolton
- Poundland – 350, 000 sq ft – M6 Epic, Wigan

2016/2017- Current suitable active requirements

- JLR- Car distribution facility- Under offer – Stowe.
- Wincanton- Feasibility study for new 500,000 sq ft facility
- NSV –400,000 sqft
- AO.com – Potential consolidation from Crewe – 500,000 sq ft +
- Pets At Home – Potential expansion from Trentham Lakes
- Conviviality PLC- 450,000 sq ft Relocation
- BooHoo- 700,000 sq ft- New HQ Distribution facility
- Ocado- 600,000 sq ft – Regional Distribution facility
- L'Oreal- 750,000 sq ft – Regional Distribution facility
- Movianto: 250,000 sq ft in Warrington
- Swizzles Matlow: 200,000 – 300,000 sq ft FH D&B

All of the above companies are increasingly putting a reliance on cost effective labour supply, affordable land and shorter journey to work areas, which Cliff Lane can offer compared to sites located in the South and Midlands where fierce competition for prime/ core sites has resulted in significant land value increases and in turn higher rents as landlords struggle to make development appraisals stack up.

In terms of anticipated employment generation, the examples below show employee numbers in various distribution centres in the North West:

Occupier	Location	Size (sq ft)	Job Numbers
Aldi	Logistics North, Bolton	600,000	700
DPD Geopost	Chadderton	70,000	230



The Hut Group	Warrington	685,000	1000
Amazon	Three Fulfilment Centres	3,000,000 (inc mezzanines)	3000 (permanent)
Lidl	Logistics North, Bolton	500,000	400
Martin Brower	Ongoing requirement	380,000	650
Ocado	Ongoing requirement	400,000	650
Missguided	Trafford Park	250,000	400

Proposed future scheme

The wider North West market continues to be driven by units ranging between 125,000 - 400,000 sq. ft. However we are seeing evidence of increased demand from retailers for large national and regional distribution centres of upwards on 700,000 sq ft. Therefore at the planning stage it is imperative that the whole scheme is granted outline planning permission to avoid unnecessary phasing which could be restrictive in attracting larger enquiries as the result of the increased land take from such requirements. If we look at Omega Warrington and Logistics North, Bolton two schemes in particular which have a comparable strategic location to the Land at Cliff lane. Take up since 2012 has totalled 3,000,000 and 2,000,000 sq ft respectively.

Conclusion

Cliff Lane should be considered as a "Key Opportunity Site" in a location benefiting from excellent national motorway links. Cliff Lane is the optimal size to accommodate local and regional large scale industrial and logistics projects.

The site is also suitable for other growth industries such as engineering, advanced manufacturing, automotive and energy & environment businesses due to its location and local labour supply.

The majority of occupiers (both footloose and indigenous) now want to see built out industrial product and immediately deliverable bespoke design and build options of new large units to address their operational needs.

There is a chronic imbalance between supply and demand as increasing numbers of businesses seek sites for distribution and warehouse facilities in strategic locations with easy access to the region's major transport networks, which means that the Cliff Lane will provide a compelling business case for the majority of occupiers.

This coupled with Langtree Property Partners, First Pannatoni and PGIM's proven track record, makes Cliff Lane one of the most important site's within Cheshire. With all of the above factors combined we are of the opinion that the Cliff Lane site has the potential to be not only a significant local site but also a significant regional site within the logistics and industrial market and should therefore be allocated as an employment site in the Council's emerging Local Plan to meet both the employment land requirements of the Council and operational needs of the logistics industry.

We trust this letter is sufficiently comprehensive and look forward to discussing the contents of it with you further in due course.

Yours Sincerely,



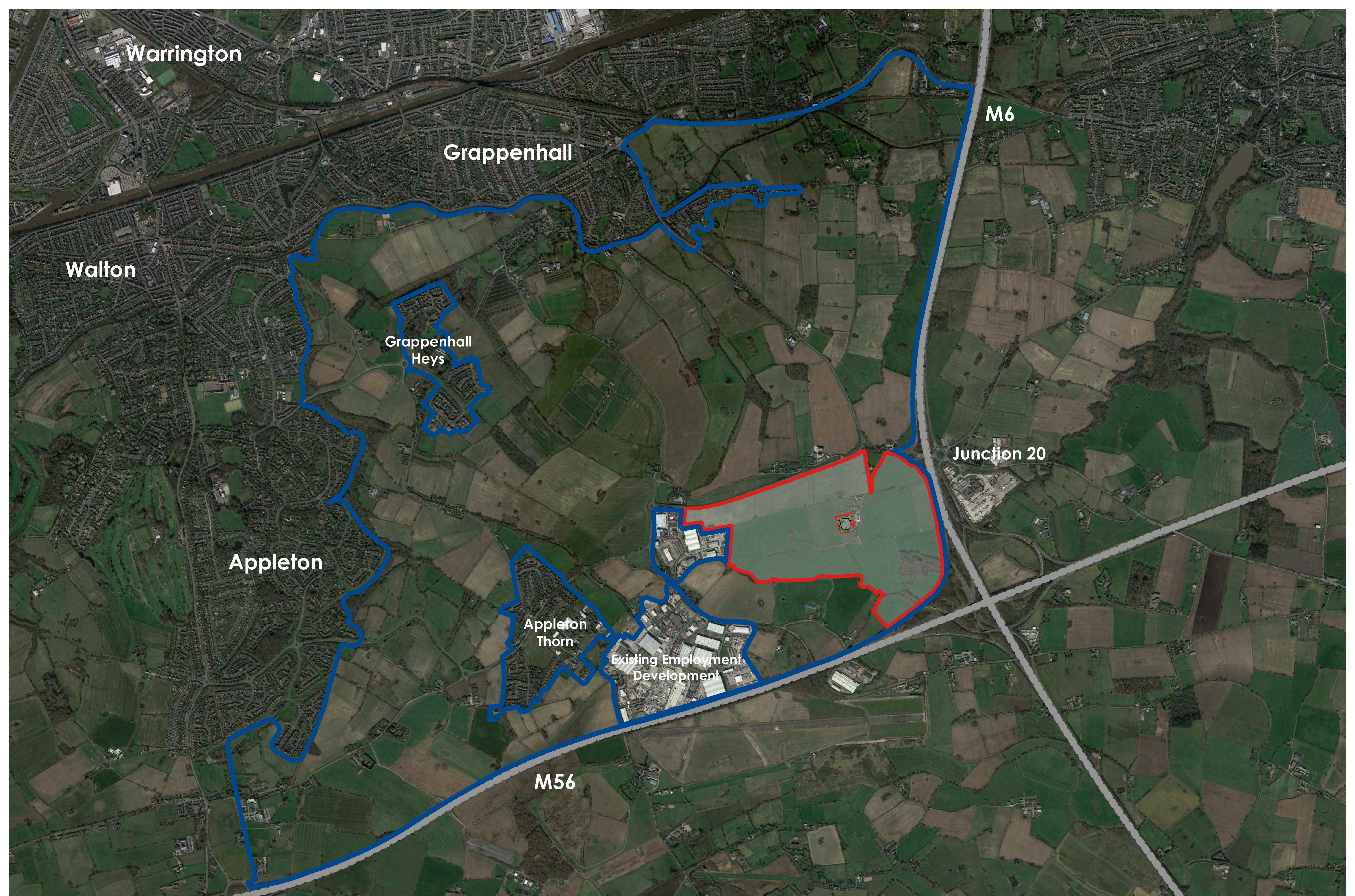


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Appendix 2 – Masterplan Concept for the M6/M56 Interchange site



Warrington

Walton

Grappenhall

Grappenhall Heys

Appleton

Appleton Thorn

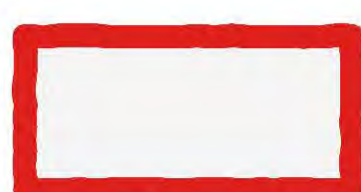
Existing Employment Development

M6

Junction 20

M56

Rev: Date: By: Decision:



Employment Development Area



South Warrington Urban Extension Area

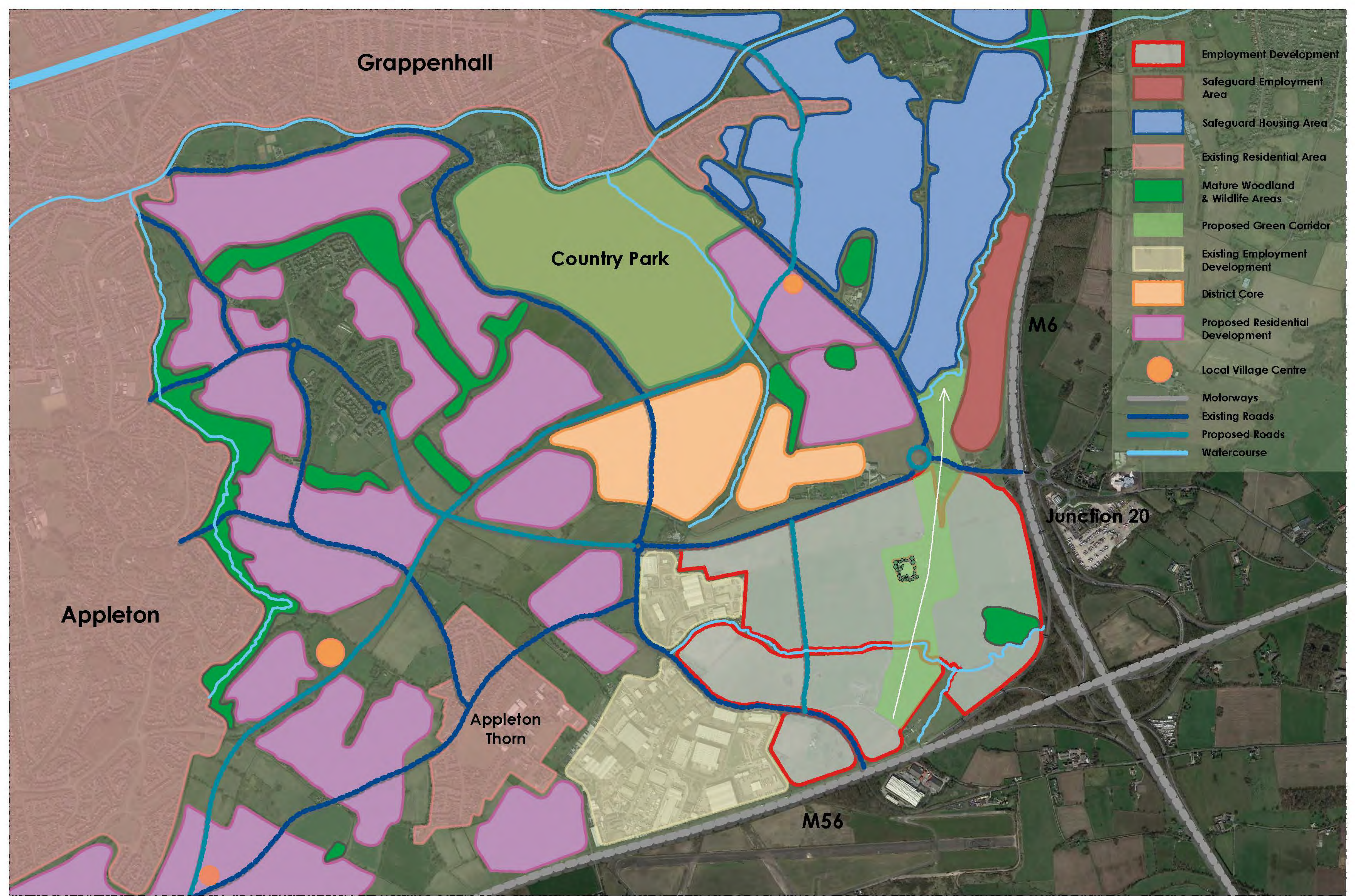


Motorways



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Cliff Lane, Warrington
Location Plan
CDE Reference
Drawn: JG
Date: 15/06/20
Scale: 1:5000 @ A0
Project No: 16-184
Dwg No: K006
Rev: -



- Employment Development
- Safeguard Employment Area
- Safeguard Housing Area
- Existing Residential Area
- Mature Woodland & Wildlife Areas
- Proposed Green Corridor
- Existing Employment Development
- District Core
- Proposed Residential Development
- Local Village Centre
- Motorways
- Existing Roads
- Proposed Roads
- Watercourse

Grappenhall

Country Park

M6

Junction 20

Appleton

Appleton Thorn

M56



- Motorways
- Proposed Roads
- Public Right of Way
- Development Links
- Existing Roads
- Watercourse

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Cliff Lane, Warrington
 Masterplan Concept Development
 CDE Reference
 Drawn By: [blank] Drawing Status: Preliminary
 Date: 1/25/20 @ 40 Date: 22/06/2017
 Project No: Dwg No: Rev:
 16-184 K004