

**Langtree PP & Panattoni**

# **Six 56 Warrington**

## **Replacement Planning Statement**

Revision C – October 2021



## Revision Record

Revision Reference	Date of Revision	Nature of Revision	Author	Checked By
A	27/03/2019	Minor amendments as result of review	Stephen Courcier	GW and DR
B	01/04/2019	Revisions to reflect Legal Review	Stephen Courcier	DR
C	20/09/2021	Replacement	Gavin Winter	DR

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<b>Report Date</b>	Oct 2021
<b>Project No.</b>	4055
<b>Document Ref.</b>	P0-TP-SPA-RP-P4055-0020-C
<b>Revision</b>	C

## Contents

<b>1.</b>	<b>Introduction .....</b>	<b>5</b>
<b>2.</b>	<b>Site Context and Development Proposals .....</b>	<b>11</b>
	Development Description.....	16
<b>3.</b>	<b>Relevant Planning History .....</b>	<b>34</b>
<b>4.</b>	<b>Stakeholder Engagement Summary .....</b>	<b>35</b>
	Overview .....	35
	Engagement with the Local Planning Authority and Statutory Bodies .....	37
<b>5.</b>	<b>Statutory Policy Context and Other Relevant Policies .....</b>	<b>41</b>
<b>6.</b>	<b>Planning Assessment and Justification.....</b>	<b>68</b>
<b>A)</b>	<b>Compliance with National Planning Policy Framework (NPPF 19)</b>	<b>70</b>
	I) National Policy on the Green Belt.....	70
	II) National Policy on the Historic Environment.....	126
	III) Overall Compliance with National Planning Policy .....	129
<b>B)</b>	<b>Compliance with the Warrington Local Plan Core Strategy (July 2014) .....</b>	<b>130</b>
<b>C)</b>	<b>Material Considerations .....</b>	<b>145</b>
<b>D)</b>	<b>Non-Compliance with the Development Plan.....</b>	<b>150</b>
<b>7.</b>	<b>Potential Conditions and Section 106 Heads of Terms .....</b>	<b>151</b>
<b>8.</b>	<b>Conclusions .....</b>	<b>156</b>
<b>9.</b>	<b>Appendices.....</b>	<b>158</b>

### Table of Figures

Figure 1 – National Context Plan.....	10
Figure 2 – Regional Context Plan.....	11
Figure 3 – Application Site Boundary.....	12
Figure 4 – Relevant Planning Considerations.....	14

Figure 5 – Illustrative Masterplan.....15  
Figure 6 – Relevant Planning Applications.....29  
Figure 7 – Extract from Warrington Local Plan Core Strategy Proposals Map.....35  
Figure 8 – Relevant Core Strategy Policies.....37  
Figure 9 – Relevant Appleton Thorn Neighbourhood Plan Policies. ....39

## I. Introduction

- I.1. This Planning Statement is a replacement of the original Planning Statement prepared by Spawforths (dated 1<sup>st</sup> April 2019). The Replacement Planning Statement has been prepared in response to a request by Warrington MBC Planning Officers to update the planning justification for the Application Proposals. To avoid confusion, the Replacement Planning Statement supersedes the original document, which no longer forms part of the Planning Application.
- I.2. Spawforths have been instructed by Langtree and Panattoni to prepare and submit an outline planning application for warehouse development (Use Class B8 with ancillary B1(a) offices) and associated infrastructure on land adjacent to Junction 20 of the M6 Motorway and Junction 9 of the M56 Motorway (referred to as Six 56 Warrington). The application description has been updated since it was submitted and it can now be described as follows:

*The outline application (all matters reserved except for means of access) comprises the construction of up to 287,909m<sup>2</sup> (3,099,025ft<sup>2</sup>) (gross internal) of employment floorspace (Use Class B8 and B1(a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure including car parking and vehicle and pedestrian circulation, alteration of existing access road into site including works to the M6 J20 dumbbell roundabouts and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station, and ecological works.*

- I.3. The application is in outline and reserves all matters except Means of Access. Permission is sought in detail for alterations to the existing access road into the Site including relocation of the A50 Cliff Lane roundabout, the M6 J20 dumbbell roundabouts, realignment of the existing A50 junction and widening of the M6 Northbound off-slip.
- I.4. The application is submitted to Warrington Borough Council. It is considered to be EIA development and as such, in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017) (as amended by the temporary 2020 Regulations), is accompanied by an Environmental Statement (ES) and ES Addendums. This includes a First Addendum submitted in October 2020 and a more recent Second Addendum submitted in

November 2021, in response to consultee responses and subsequent amendments which have been made to the proposals.

- I.5. The application is submitted in the context of a significant identified need for employment development, particularly to serve the logistics market. The Site is located close to the confluence of the M56 and M6 Motorways and lies adjacent to an existing key strategic location for employment-related development in the Core Strategy.
- I.6. The Applicants have taken professional advice from a development team and supplementary information has been prepared in support of the application by the following consultants. This Statement should be read in conjunction with these reports. The ES Chapters are also set out below.

#### **Planning**

- Spawforths – Replacement Planning & Regeneration Statement (this statement)
- Spawforths – Alternative Sites Assessment (appended to the ES Part I Report)
- Model Logic Ltd – Independent Logistics Study Report (appended to the Replacement Planning Statement)
- Newgate Communications – Consultation Report

#### **Plans and Design Documents**

- Site Context Plan (regional)
- Location Plan
- Updated Illustrative Masterplan
- Updated Earthworks Cut and Fill Analysis
- Updated Proposed Finish Levels Including Mounds
- Updated Illustrative Sections
- Design and Access Statement
- Updated Means of Access Plans -
  - Eastern Site Access
  - Western Site Access
  - M6 J20 and Cliff Lane Mitigation Works
  - Pedestrian Cycle Improvements
- Noise Mitigation Details Plan

- SP Energy Networks Existing Electric Record Drawings
- Transco Existing Gas Record Drawings
- United Utilities Existing Water Record Drawings
- Proposed Electric Point of Connection
- Proposed Gas Point of Connection
- Proposed Water Point of Connection 1
- Proposed Water Point of Connection 2

#### **Parameters Plans**

- Updated Development Cells
- Updated Disposition
- Updated Building Heights (including reduced building heights)
- Updated Green Infrastructure
- Updated Access and Circulation
- Updated Drainage
- Updated Noise
- Updated Heritage
- Updated Demolition

#### **Technical Reports**

- Whole Life Carbon Assessment 1015524-RPT-SY-001 Rev B
- Updated Lighting Assessment
- *Appended to the ES 1 Second Addendum*)
- Phase I Geotechnical and Geoenvironmental Assessment. Report reference 1015524.RPT.GL.002. (Cundall) September 2017,
- Baseline Geotechnical and Geoenvironmental Assessment, Report reference 1015524.RPT.GL.003. (Cundall) September 2017
- Geotechnical and Environmental Ltd, Warrington Interchange Factual Report, report reference M518, (Dunelm) June 2018,
- Ground Investigation Report, reference 1015524.RPT.GL.004 Rev A. (Cundall), July 2018
- *(All Appended to ES Part 2 Geology & Ground Conditions Technical Paper 1)*
- Updated Transport Assessment and Travel Plan (Curtins)

- *(All Appended to ES Addendum Part 2 Traffic & Transport Technical Paper 2)*
- Updated Flood Risk Assessment (FRA) and Drainage Strategy (Cundall) *(Appended to ES Addendum Part 2 Drainage & Flood Technical Paper 3)*
- Arboriculture Survey and Impact Assessment Rev A (Landscape Science Consultancy Ltd) *(Appended to ES Addendum Part 2 LVIA Technical Paper 4)*
- Badger Survey Methodology and Results (Tyler Grange) CONFIDENTIAL
- Bat Survey Methodology and Results (Tyler Grange)
- Breeding Bird and Barn Owl Survey Methodology and Results (Tyler Grange)
- Wintering Bird Survey Methodology and Results (Tyler Grange)
- Great Crested Newt Survey Methodology and Results (Tyler Grange)
- Water Vole and Otter Survey Methodology and Results (Tyler Grange)
- *(All Appended to ES Part 2 Addendum Ecology & Nature Conservation Technical Paper 5)*
- Biodiversity Net Gain Assessment (Tyler Grange)
- Residential Visual Amenity Assessment (RVAA)
- *(Appended to ES Addendum Part 2 Landscape & Visual Impact Assessment (LVIA) Technical Paper 4)*
- Baseline Noise Survey Results (Cundall) *(Appended to ES Addendum Part 2 Noise & Vibration Technical Paper 7)*
- Air Quality Model Verification (RPS Group) *(Appended to ES Part 2 Air Quality Dust & Odour Technical Paper 8)*
- Archaeological Geophysical Survey Report, January 2019 (Phase Site Investigations) *(Appended to ES Addendum Part 2 Cultural Heritage Technical Paper 9)*
- Letter report prepared by Cundall detailing the condition of the Bradley Hall Farm Agricultural Buildings
- *(Appended to ES Addendum Part 2 Cultural Heritage Technical Paper 9)*
- Outline Site Waste Management Plan (RPS Group) *(Appended to ES Part 2 Waste Technical Paper 11)*
- Outline Operational Waste Management Strategy (RPS Group) *(Appended to ES Part 2 Waste Technical Paper 11)*
- Agricultural Land Classification Survey (Patrick Stephenson Arable Advisor) *(Appended to ES Part 2 Agricultural Land & Soils Technical Paper 13)*
- Framework Construction Environmental Management Plan (Ridge) *(Appended to the ES Part 1 Report)*



- Updated Light Spill Assessment – Technical Assessment (Cundall) (*Appended to the ES Addendum Part 1 Report*)

**Environmental Statement and Addendums:**

- Non-Technical Summary Second Addendum
- Environmental Statement Part 1 and Second Addendum
- Environmental Statement Part 2 (including Addendum Technical Papers):
  - Paper 1 Ground Conditions and Contamination
  - Paper 2 Traffic and Transport First Addendum
  - Paper 3 Drainage and Flood Risk First Addendum
  - Paper 4 LVIA Second Addendum
  - Paper 5 Ecology and Nature Conservation First Addendum
  - Paper 6 Socio Economic First Addendum
  - Paper 7 Noise and Vibration First Addendum
  - Paper 8 Air Quality and Dust
  - Paper 9 Cultural Heritage and Archaeology First Addendum
  - Paper 10 Utilities
  - Paper 11 Waste
  - Paper 12 Energy
  - Paper 13 Agricultural Land & Soils

1.7. The Replacement Planning Statement is structured as follows:

- **Section 2** sets out the Site context and the Development Proposals;
- **Section 3** identifies the relevant planning history and designations;
- **Section 4** provides a summary of stakeholder engagement undertaken in formulating the Development Proposals;
- **Section 5** provides details of the Statutory Planning Policy context and Other Material Considerations that are relevant to the assessment of this application;
- **Section 6** identifies an analysis of the Planning Justification of the Proposed Development including its potential compliance with National Guidance and the Development Plan;

- **Section 7** identifies potential conditions and any proposed planning obligations that may be attached to a planning permission for the Application Proposals;
- **Section 8** summarises the findings of the Replacement Planning Statement and concludes the overall Planning Balance.

## 2. Site Context and Development Proposals

### Site Location and Context

- 2.1. The Application Site is located in the North West of England, predominately within the local authority of Warrington with a small section in the south-eastern part of the Site located within the Cheshire East administrative boundary. The Site is located to the southeast of the town of Warrington (approximately 6 km (3.5 miles) from the town centre) and between the cities of Liverpool and Manchester (approximately 22km (13 miles) and 31km (19 miles) respectively). It is also located approximately 16km (10 miles) from Manchester Airport.
- 2.2. The M56 Motorway and M6 Motorway interchange (Junction 20 and 20A of the M6 and Junction 9 of the M56 Motorways) is located adjacent to the south east of the Site, with the M56 Motorway running east-west to the south of the Site, providing links to Cheshire and Greater Manchester; and the M6 Motorway running north-south to the east of the Site, provide links to Lancashire, Staffordshire and Greater Manchester, as well as the M62 Motorway at Junction 22A of the M6 Motorway to the north, which provides links east-west to Liverpool, Greater Manchester and Yorkshire. The Site location is shown on the national and regional context plans below:

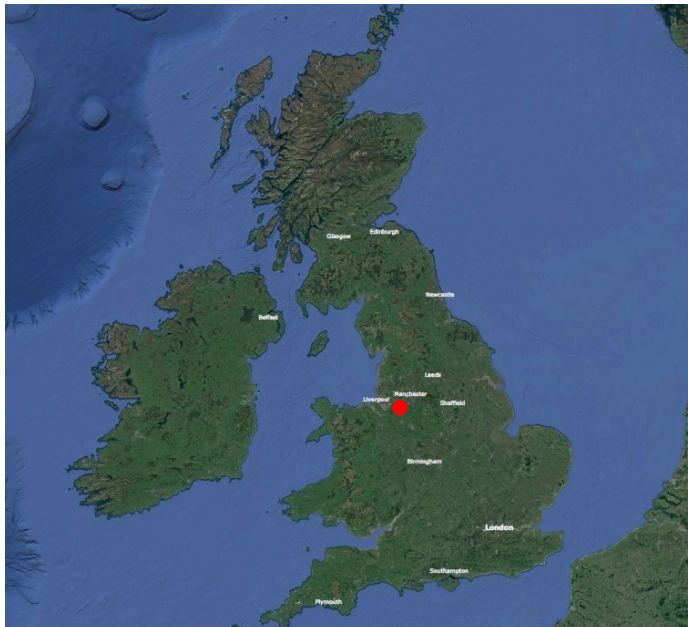


Figure 1 – National Context Plan

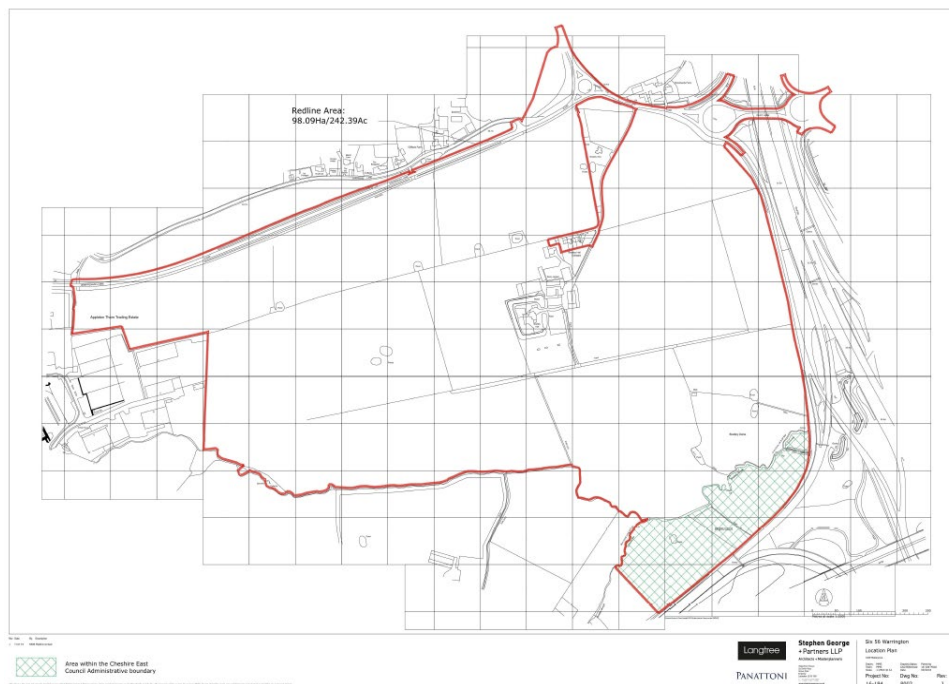


Figure 2 – Regional Context Plan (yellow line representing the boundaries of Cheshire)

- 2.3. The Site relates to an area of land of approximately 98 hectares (242 acres) in extent and is irregular in shape. It is bound by the B5356 Grappenhall Lane and the A50 Cliff Lane to the north and motorway slip road to the east. Appleton Thorn Trading Estate, Barleycastle Trading Estate and Stretton Green Distribution Park are located to the west and Bradley Brook runs east-west to the southern boundary. The Site is predominantly farm land (arable and pastoral), with a series of hedges and trees to field boundaries. Bradley Hall Farm consists of a farm house and a series of farm buildings as well as a further residential property. There are a number of other neighbouring residential properties that are adjacent to, but outside the Application Site, including the Bradley Hall Cottages, which are all retained. The farm buildings adjacent to the Bradley Hall Farmhouse will be demolished as part of the proposals (as shown on the Demolition Parameter Plan Ref: 16-184-PI 18 Rev E). Bradley Hall moated site is a Scheduled Monument (SM) located within the Site boundary in the eastern part of the Site, adjacent to the farm buildings. It comprises of the buried and earthwork remains of a medieval moated site for a medieval manor house, which is to be retained. The moated island is partly occupied by the farm house associated with Bradley Hall Farm, which is excluded from the Scheduling, but the building will be retained as part of the Proposed Development.
- 2.4. Beyond the northern boundary of the Site (within the triangle of land outside of the Application Site to the south of Cliff Lane) is a residential property and associated outbuildings, which is accessed from the A50 Cliff Lane via the same access as Bradley Hall Farm. There is a Grade II\* and a Grade II Listed Building located beyond the south of the Site and to the

north of Barleycastle Lane (Tanyard Farm Building and Barleycastle Farm House). There are other listed buildings within the wider area.

- 2.5. There are some wooded areas and wooded outcrops within the Site, including Bradley Gorse and Wrights Covert within the south east of the Site. A series of field boundaries consisting of hedgerows and trees and a number of ponds (ten in total) and ditches are located across the Site.
- 2.6. The character of the area is generally rural, with farms and agricultural land beyond the boundaries of the Site, predominantly to the north and south. However, this is interrupted by the Strategic Highway Network and further industrial/logistic uses, most notably those beyond the Site boundary to the south, south west and east.
- 2.7. The Site in its local context is shown on the plan below:



**Figure 3: Application Site Boundary**

- 2.8. Vehicular access to the Site is currently via Bradley Hall Farm from the A50 Cliff Lane, which has direct access to Junction 20 of the M6 Motorway, as well as Junction 9 of the M56 Motorway. There are also four field access points available from the Site's 1.15km long frontage on to the B5356 Grappenhall Lane.

2.9. There are three designated Public Rights of Way across the Site, all of which are Footpaths. Footpath No 28 runs between the residential properties adjacent to Bradley Hall Farm in the east and Appleton Thorn Trading Estate in the west, however no actual connection is available on foot into the trading estate at its western end. Also, Footpath No's 31 and 23 run north-south across the Site along the route of the main site access between Howshoots Farm to the north-east and Barleycastle Lane to the south of the Site. These PROW's are shown on the Constraints Plan below.

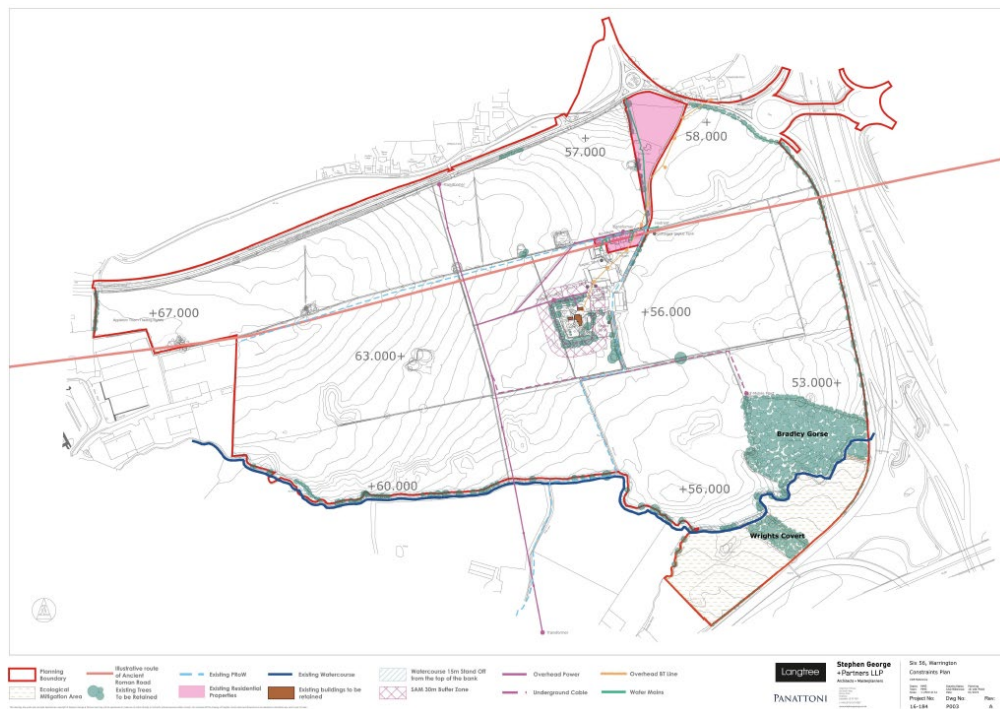


Figure 4: Constraints Plan

2.10. The Site's topography is generally level, although it has two distinct areas of topography that are separated by a ridgeline running east to west. The northern plateau is a relatively flat area and the southern plateau becomes more undulating, with occasional ponds and depressions.

2.11. The Site is currently designated as Green Belt within the adopted Local Plan Core Strategy (July 2014) and Saved Proposals Map. The Site is however proposed to be an employment allocation (known as South East Warrington Employment Area – policy ref MD6) within the Warrington Updated Proposed Submission Version Local Plan 2021-2038 (September 2021).

2.12. The various planning designations and considerations are summarised in the table below:

Planning Designations / Considerations	Site Address / Proximity to the Site
Conservation Areas	The Site is not in or adjacent to a Conservation Area
Listed Buildings	Grade II Listed Barleycastle Farmhouse and Grade II* Tanyard Farm building are located approximately 650m to the south of the Site.
Locally Listed Buildings	Bradley Hall and Barn are locally listed buildings located at the centre of the Site.
Scheduled Monuments (SMs)	Bradley Hall Moated Site is Scheduled Monument located at the centre of the Site (list entry number 1011924).
Tree Preservation Orders	There are no Tree Preservation Orders on the Site
AONB or Landscape Designation	None
SSIs/SSSIs	None
Ecological Designations	There are no statutory ecological designations on or neighbouring the Site. Rixton Clay Pits Special Area of Conservation (SAC) is the nearest, located 5.5km northeast
Flood Risk Zone	The Site is located within Flood Risk Zone I (Low Risk of Flooding)
Air Quality Management Area (AQMA)	AQMA No. 1 is partly located within the Site, with a 50 m continuous strip running along both sides of the M6, M62 and M56 Motorway corridors
Rights of Way (including PROW, bridleways etc.)	PROW Appleton 3L, Appleton 28, and Appleton 3 run through the Site from the north, west, and south respectively, meeting at the north-east corner of Bradley Hall Farm toward the centre of the Site.

Figure 5 – Relevant Planning Considerations

## Development Description

2.13. The application is an Outline Planning Application as described below:

*The outline application (all matters reserved except for means of access) comprises the construction of up to 287,909m<sup>2</sup> (3,099,025ft<sup>2</sup>) (gross internal) of employment floorspace (Use Class B8 and B1(a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure including car parking and vehicle and pedestrian circulation, alteration of existing access road into site including works to the M6 J20 dumbbell roundabouts and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station, and ecological works.*

2.14. All matters, except for the Means of Access are reserved for consideration at a later date.

The figure below shows the updated illustrative masterplan for the Proposed Development



Figure 5 – Updated Illustrative Masterplan

2.15. The Use Class B8 and ancillary B1 a office development will consist of a series of large footplate buildings accessed from the internal road network. A minimum unit size will be secured by condition. The indicative layout shows the smallest unit to be approximately 8,918.7 m<sup>2</sup>.



However, the purpose of this unit is to make best use of the residual land within the Proposed Development and therefore it is not representative of the units on the remainder of the Site. The second smallest unit size is 20,503.69 m<sup>2</sup>. The minimum floor plate has been identified to distinguish the Site offer from other more traditional and secondary employment sites and to meet an identified need for sites that can accommodate large scale logistics and distribution operators within the borough as well as the wider region. The Proposed Development will be able to capitalise on the unique site characteristics (large and level) and location (close to the M56/M6 interchange, close to the built up area of Warrington) that can accommodate large employment units. The application is supported by an Independent Logistics Study (2020) undertaken by Model Logic, JLL Evidence to the Parkside, St Helens Call In Inquiry (2020) and it also draws heavily on the Economic Development Needs Assessment (EDNA) which was produced by BE Group (August 2021) on behalf of Warrington Council to support the Warrington Updated Proposed Submission Version Local Plan 2021-2038. It identifies that there is a significant shortage of Grade A distribution space within the North West and particularly in Cheshire. Six 56 is a key opportunity to meet the demand for local large-scale industrial and logistics schemes.

#### Parameters

- 2.16. Since the submission of the planning application, consultation responses have been received from key consultees and further discussions have taken place with the Council and their key consultees (namely WBC Highway Officers, National Highways (formerly Highways England (HE)) and their consultants Atkins, WBC Environmental Protection Officers, Historic England and WBC Conservation Officer and Ramboll landscape designers acting on behalf of WBC).
- 2.17. Further clarification and information has been provided in line with requests by National Highways (formerly Highways England) and WBC Highways Officer relating to the design of the mitigation and the WMMTM traffic model.
- 2.18. WBC Environmental Protection raised concerns with exposure to high noise levels that will be experienced at existing properties on Cartridge Lane and sensitive receptors within the site comprising Bradley Hall Cottages and Bradley View to potentially unacceptably high noise levels, even with mitigation in place, based on the worst case estimates of the proposals as illustrated on the submitted masterplan and parameters plans.

- 2.19. Consequently, the illustrative masterplan and parameters plans have evolved to address comments raised by these key consultees to reduce the noise impacts on sensitive receptors within the site through the realignment of estate roads and other amendments including provision of bunding and details of the highway access into the Site with minor changes to the location of the first roundabout into the site from the east to reflect the alignment of the estate road into the site were made and submitted as part of an ES Addendum.
- 2.20. Further assessments have also been undertaken in respect of noise and vibration and landscape and visual impacts and cultural heritage. The ES Addendum therefore included additional and updated information to address the comments raised by key consultees.
- 2.21. The Council's Environmental Protection Services Manager subsequently confirmed that the parameters (including details of bunds and acoustic fencing) detailed in the Addendum Noise and Vibration ES Technical Paper 7 now gives a greater level of reassurance that the Proposed Development could occur without incurring unacceptable adverse impacts on amenity. Detailed acoustic assessment and mitigation proposals will still need to be submitted at any and every reserved matters stages to clearly identify activities and associated necessary mitigation which would form part of any reserved matters development going forward. Subject to the imposition of planning conditions on the outline planning permission to ensure that detailed acoustic assessments are provided which identify all necessary mitigation with any reserved matters application submitted, the Council's Environmental Protection Services Manager confirmed they have no objection.
- 2.22. Landscape Consultants Ramboll's acting on behalf of the Council have also recommended further supplementary information, including an assessment of potential effects on the visual amenity of properties in the vicinity, in order to provide greater transparency to the LVIA and its findings and to aid WBC in its determination of the application.
- 2.23. Other updates to the Parameters Plan include minor amendments to the location of the surface water drainage features and minor amendments the location of landscape bunds and attenuation barriers. These are described in the following sections below.
- 2.24. Since the submission of the ES Addendum, further consultation responses have been received from Landscape Consultants Ramboll's acting on behalf of the Council. This raised concerns regarding the scale of some the proposed buildings. Notwithstanding these comments, this

consultee response did also outline information and requirements for inclusion in any future reserved matters applications, which could be controlled through planning conditions.

- 2.25. Following this consultee response, the Applicant has given consideration to the comments and concerns pertaining to the scale and massing of proposed buildings and has agreed to reduce some of the building heights outlined in the building zones illustrated on the Building Heights Parameters Plan, which are the highest and most dominant features of the proposals. A revised Heights Parameters Plan Drawing No. 16-194 P115 Rev H reduces the maximum building height in Zone B2 from 43.5m to ridge (40m clear internal height) to 30m to ridge (26.5m clear internal height), which relates to Plot 4 of the Illustrative Masterplan and Zone D1 and D2 from 24.5m to ridge (21m clear internal height) to 22m to ridge (18.5m clear internal height), which relates to Plots 2 and 3 of the Illustrative Masterplan. The Applicant considers this will help address any effects on landscape character or visual amenity and minimise any significant effects, alongside proposed landscaping which will also soften and screen development from neighbouring residential receptors and the wider landscape.
- 2.26. A Second ES Addendum has now been prepared and submitted to incorporate the reduction in the building heights within certain building zones illustrated on the Building Heights Parameters Plan. All ES Papers have therefore considered revisions to the project description and re-assessed the environmental impacts. This Second Addendum provides a further assessment included in the LVIA ES Technical Paper 4 to consider the landscape and visual impacts of reducing building heights on the Proposed Development and address representations received since the submission of the First Addendum.
- 2.27. Following the design evolution of the Proposed Development (post submission of the planning application), the parameters are now fixed, and formed the basis of the Environmental Assessment and its Addendum.
- 2.28. The updated Illustrative Masterplan shows how the Site could be developed, taking account of the Site Parameters. This has been updated as part of the ES Addendum submission.
- 2.29. The updated parameters that inform the proposals for the Site have also been generated from the key drivers originally identified within the South Warrington Urban Framework Plan Document (SWUEFP) and Warrington Garden Suburb Development Framework Document (March 2019). From this starting point, the arrangement of the Site has been heavily influenced by the presence of the Scheduled Monument, the neighbouring land uses, including the

sensitive residential receptors, the strong transport links and facilities that establish a series of hard boundary conditions, site topography and geological features, and substantial landscape features including Bradley Gorse and Bradley Brook to the immediate South East of the Site.

2.30. The Proposed Development's evolution has been influenced by a sequence of development plateaus relating to their immediate and wider context arranged around access routes through the Site. The scope of development of each of the plateaus is directly related to that of its immediate neighbours and the associated boundaries of that plateau. Environmental testing has also influenced the scheme evolution.

2.31. These fixed parameters are grouped into a series of themes and are identified across the suite of accompanying Parameter Plans. These themes are as follows:

- Development Cells – Developable areas across the Site areas.
- Disposition – Land use and disposition of uses across the Site, number of units, floor space and car parking provision.
- Building Heights – zonal areas identifying maximum building heights across the Site.
- Green Infrastructure – strategic landscaping, open green corridor, ecological mitigation, buffers and bunds and retained vegetation.
- Access and Circulation – points of access into the Site, improvements to A50 junction and M6 J20 dumbbell roundabouts including existing, proposed and diverted footpaths and cycleways and areas safeguarded for potential highway improvements.
- Drainage – including detailed proposed drainage strategy.
- Noise – including areas identified for noise mitigation.
- Heritage – buffers to Heritage Assets.
- Demolition – buildings proposed for demolition.

#### Development Cells

2.32. As part of the Environmental Statement (ES) testing of the Development Proposals, maximum heights and floorspace are being tested. The application is in outline but is supported by a

number of parameter plans that identify four individual development cells (Ref: 16-184-PI 10 Rev G).

2.33. The Proposed Development is to provide a maximum developable area of 64.94 hectares (160.49 acres) This will be provided across 4 development cells, located west to east across the site, as follows:

- Zone A – 2.33 hectares (5.76 acres)
- Zone B – 32.84 hectares (81.14 acres)
- Zone C – 5.06 hectares (12.51 acres)
- Zone D – 22.67 hectares (56.02 acres)

2.34. The cells have been created through a constraints exercise and following consideration of landscaping and ground levels. The cells inform the limits of development in terms of the buildings and on-site infrastructure.

#### Disposition

2.35. The Proposed Development will provide up to 287,909m<sup>2</sup> (3,099,025ft<sup>2</sup>) of floor space across the site. This will be accommodated within 7 to 13 new buildings across the site, covering B8 uses with ancillary B1 (a) office use, with retention of the existing Bradley Hall Farm house and cessation of its use for residential purposes. Only new buildings are proposed within these development cells.

2.36. The disposition of the uses within the Site is shown on the Disposition Parameters Plan (Ref: 16-184-PI 16 Rev I). The largest cell (Zone B) is shown as delivering three large buildings on the illustrative masterplan (Ref: 16-184-F013-001). However, the disposition parameters plan identifies that Zone B could deliver between 1 and 6 units, subject to minimum unit size. Zones A is shown as delivering 1 building, whilst C and D are shown as respectively delivering 1 and 2 buildings, on the updated illustrative masterplan. However, disposition parameters plan identifies that Zone A could deliver between 1 and 3 units, Zone C only 1 unit, and Zone D could provide between 1 and 3 units. The actual number of units delivered on the Site will depend on market demand.

2.37. Finished Floor Levels (FFL) will fluctuate across the site to reflect the cut and fill exercise that will create the development platforms, illustrated on the finished levels contour plan with a

suggested FFL in Zone C (60.25 AOD) and D (D2: 55.50 AOD and D1: 56.50 AOD) to the east of the site, compared to Zone A (65.50 AOD) and B (B1: 63.50-65.50 AOD, B2: 61.50 AOD) to the centre and east of the site.

#### Building Heights

- 2.38. The Building Heights Parameters Plan (16-184 P115 Rev H), has been updated as part of a Second ES Addendum to reflect concerns regarding the scale of some of the proposed buildings, with a reduction in some of the building heights outlined in the building zones illustrated on the Building Heights Parameters Plan. This will help address any effects on landscape character or visual amenity and minimise any significant effects, alongside proposed landscaping which will also soften and screen development from neighbouring residential receptors and the wider landscape.
- 2.39. Across the Site, built form will now range from 12.5m to 26.5m to haunch and 16m to 30m to ridge. The upper range of building heights will be located to the east and south of the site and the lower range to the north and west of the site. Zone A will have a maximum of 16m (to ridge) above FFL. In Zone C and the northern part of Zone B there will be a maximum of 18.5m (to ridge) above FFL. In the southern part of Zone B there will be buildings ranging from a maximum of 30m (reduced from 43.5m) to 22m-(to ridge) (reduced from 24.5m) above FFL and in Zone D a maximum of 22m (to ridge) (reduced from 24.5m) above FFL.
- 2.40. These are maximum unit heights, but the final unit heights will ultimately be determined by end user requirements that are driven by commercial demand.

#### Green Infrastructure / Biodiversity

- 2.41. The Proposed Development has been carefully designed to incorporate areas of soft and hard landscaping. The Site is subject to a Landscape Visual Impact Assessment (LVIA) that considers how the Proposed Development may be implemented and what measures may be required. The LVIA can be viewed within the accompanying Technical Paper 4 of the ES and its Second Addendum.
- 2.42. Strategic landscaping will be provided around the boundaries of the Site. This will involve the retention and enhancement of the existing woodland blocks, trees and vegetation on the outer Site boundaries. In addition, new woodland belts on earth mounding will be introduced along the Site boundaries and internal roads.

- 2.43. Bradley Gorse and Wright Covert to the south eastern extent of the Site are to be retained, as are the trees within and around the Bradley Hall moated site to the centre of the application Site. A green corridor will be provided from north to south to retain an open corridor around the Bradley Hall moated site and through the Site. Any proposed estates roads through this Green Corridor will be constructed to minimize any impact of views through this corridor and impacts on the setting of the SAM.
- 2.44. A 15m standoff from built development will be retained to Bradley Brook, which runs east to west along the southern boundary of the Site. No new buildings are proposed within these areas of green infrastructure identified on the updated Parameters Plan. Bradley Hall Farm House and curtilage buildings, located within the SAM will all be retained. The Applicant will agree through the grant of any outline planning permission to cease use of these buildings for residential purposes on the commencement of any proposed development on the site, to remove any impact on residential amenity. Further change of use applications will be required to determine future uses of these buildings and ensure uses are complementary to the setting of these locally listed buildings and the setting of the SAM.
- 2.45. The Site has been extensively surveyed in terms of biodiversity. These surveys are included as part of this submission and considered in Technical Paper 5 of the ES and its Addendum. An area of ecological mitigation is to be provided to the south of Bradley Brook, around Wrights Covert. These landscape features will create new wildlife corridors and enhance biodiversity across the whole of Site. The extent and form of the landscaping and habitats will be guided by the Green Infrastructure Parameters Plan (Ref: I6-184-P111 Rev I).
- 2.46. An area of ecological mitigation is to be provided to the south of Bradley Brook, around Wrights Covert. The ecological mitigation area can accommodate total of seven replacement ponds, based on the principle of 2:1 replacement of GCN breeding ponds, and 1:1 replacement of other ponds to enhance aquatic breeding habitat for Great Crested Newts (GCN).
- 2.47. To raise the provision of new wetland habitat towards a 2:1 replacement of all ponds, a number of the proposed attenuation basins in locations identified on the updated Drainage Parameters Plan can be designed so that they will permanently hold water. Where possible, ponds selected for this treatment will be those closely linked to the proposed Green Infrastructure and Bradley Brook watercourse corridor and will be landscaped to maximise benefits for wildlife. Other attenuation features included across the scheme which are likely

to be dry most of the time will be appropriately landscaped to provide a contribution towards additional terrestrial habitat for GCN and other wildlife using the site.

- 2.48. Habitat within the ecological mitigation area will include rough grassland for foraging with hedgerows and scattered scrub for cover and hibernation. It is likely that the existing grassland habitat can mostly be enhanced through an appropriate management regime of periodic cutting, rather than habitat creation. New hedgerow and scattered scrub (throughout the site) will include native species such and those which provide flowers or fruit resources through the year to also provide benefit for other wildlife.

#### Access and Circulation

- 2.49. The application is in outline with all matters reserved except for Means of Access. The application seeks detailed consideration of the works to create the new access points via two roundabouts on Grappenhall Lane (B5356) as well as mitigation works to the A50/Cliff Lane roundabout and Junction 20 of the M6 Motorway (plan ref: 16-184 P113 Rev G). Minor changes have been made to the realignment of the first access point as you approach from the Cliff Lane roundabout, as illustrated on the updated Access and Circulation Parameters Plan. This is to reflect the alignment of the estate road into the site and has moved c. 45.5m to the east and will alleviate noise impacts on residential properties.

- 2.50. The package of works includes:
- Relocation of the A50 Cliff Lane roundabout to the west of its existing location to enhance the storage capacity of the link between the roundabout and the motorway;
  - Full signalisation of a new realigned A50 Cliff Lane roundabout with widening of all approach arms and reduction of the exit arm onto the A50 to one lane;
  - Widening of the A50 link between the A50 Cliff Lane roundabout to provide two lanes for much of the links length;
  - Partial signalisation of the two M6 J20 dumbbell roundabouts;
  - Widening of the M6 Northbound off-slip;
  - Widening of the circulatory carriageway on the two M6 J20 dumbbell roundabouts and rationalisation of the lane markings / directional arrows; implementation of a yellow box and installation of queue detectors; and



- Widening on the eastern approach to the dumbbell roundabouts.

- 2.51. A footway and cycleway is proposed along the length of the Site's northern boundary and frontage with the B5356 Grappenhall Lane. This should be a 3.5m shared cycleway/footway 1.2km in length along this road corridor. Following comments raised by WBC Highways in their consultee response the Applicant has agreed to commit to providing a commuted sum towards continuing this shared cycleway/footway beyond the Application boundary extending the footway to the Grappenhall Lane / Broad Lane roundabout to provide better pedestrian permeability and connections. This would necessitate an additional 175m of footpath on existing highway land to the south of Grappenhall Lane to continue the pedestrian/cycle infrastructure to the Broad Lane roundabout. The presence of street furniture and vegetation in this area and the width of the adopted verge may require a reduction of the 3.5m width to achieve this. It is understood that WBC would also like to see a new pedestrian/cycle crossing facility at the Broad Lane roundabout. This would further enhance connectivity with Broad Lane in the north and/or the southern section of Grappenhall Lane connecting it with Barleycastle Lane. The Applicant is able to commit towards providing a commuted sum towards these improvements. The delivery of circa 1.5km of new pedestrian and cycle infrastructure and upgrades to the existing PROW network, would offer significant benefits over the existing situation. This infrastructure will enhance connectivity between the site and existing/proposed residential areas to the west, connectivity to Broad Lane. The enhanced PROW connections through the site and existing infrastructure at J20 does also provide a continuous link connectivity to the M6 Junction 20 and beyond in the east and connectivity to the A50 Knutsford Road.
- 2.52. The Applicant has also agreed with WBC to safeguard a section of their land, which will be landscaped within the Application boundary extending from Grappenhall Lane to facilitate any future road widening and improvements required on Grappenhall Lane. This will ensure the protection of a 25m corridor along Grappenhall Lane can be achieved utilizing the existing adopted highway and a small part of the Applicant's land.
- 2.53. Footpath 31 follows the line of the current farm access into the Site from the A50 Cliff Lane and continues past the Bradley Hall moated site and to the south of the Site as Footpath 23. It is proposed to retain Footpath 31 in its general extent, but it may require a minor variation to the alignment to provide a safe crossing point across an internal estate road.

2.54. Footpath 28 runs east-west across the site from Footpath 23 and 31, to the north of the Bradley Hall cottages, across the fields, before terminating at the field boundary to the western extent of the Site. Footpath 28 will be diverted as part of the Proposed Development. Its diverted route will run along the northern boundary of the Site, parallel with the B5356 Grappenhall Lane at the point of the proposed eastern access point. It will then re-enter the Site alongside an internal estate road and re-join Footpath 23.

2.55. Circulation within the Site is to be detailed at the Reserved Matters stage.

#### Drainage

2.56. A Drainage Strategy has been prepared and submitted as part of this application. Ultimately, each development plot will have its own surface water drainage strategy as well as attenuation of the associated and immediate public realm. A strategy is being developed for plot level and Site wide drainage.

2.57. Sustainable drainage systems will be used along with greenfield runoff rates for surface water drainage. The proposed storm water drainage strategy will see the Site with eventual discharge direct to Bradley Brook at a Greenfield Runoff Rate (GRR). Storm water will be restricted to GRR from each plot and conveyed to a central SuDS corridor where discharge from the road network will also discharge. Treatment levels will be provided both on plot and in the public realm.

2.58. In order to provide flood risk protection to the Site and to the surrounding neighbourhood to manage the limited storm water discharge, onsite attenuation will be provided both in the main infrastructure and within the plots. Proposed detention basins, ponds and surface water features are included within the scheme.

2.59. Minor changes have been made to the location of these attenuation basins and swales which have been revised to reflect the updated earthworks model.

2.60. To raise the provision of new wetland habitat towards a 2:1 replacement of all ponds, two of the proposed attenuation basins, adjacent to Plot 1 and Plot 2 on the updated Illustrative Masterplan and Updated Drainage Parameters Plan are now designed so that they will permanently hold water. This has been requested to satisfy comments raised by GMEU during the planning application consultation process.

- 2.61. Foul water will be pumped to meet United Utilities sewers from a new pumping station within the site.
- 2.62. The proposals are subject to Drainage Parameter Plan (Ref: I6-I84-PI I7 Rev H).

Noise

- 2.63. The updated Acoustics Parameter Plan (Ref: I6-I84 PI I4 Rev G) has been prepared based on the findings of the Noise Baseline Assessment. The Plan identifies areas closest to boundaries with residential properties and where external service plant or other noise generating equipment should not be placed, unless it can be demonstrated that appropriate mitigation can be put in place to avoid significant adverse effects on the noise receptors. It also details that in these areas, delivery/loading bays should be orientated away from the Site boundaries and the neighbouring residential properties.
- 2.64. The updated Acoustics Parameter Plan will ensure appropriate noise mitigation is in place to attenuate noise levels that will be experienced during the operational phase of the development at existing properties on Cartridge Lane and sensitive receptors within the site comprising Bradley Hall Cottages and Bradley View. The realignment of the proposed roundabout access into the site shown on the updated Access and Circulation Parameters Plan, including the proposed location of bunds illustrated on the updated Acoustics Parameter Plan will reduce noise levels from road traffic and proposed service yards and docking bays to an acceptable level. The removal and realignment of any proposed estate road on the site carrying operational traffic away from Bradley Hall Cottages will also reduce noise levels adjacent to the Cottages to an acceptable noise level. The reconfiguration of landscape bunds will also retain some sense of openness around the Cottages and green corridor. This also results in revisions to the number and location of bunds adjacent to Bradley Hall illustrated on the updated Acoustic Parameter Plan.
- 2.65. Additional acoustic barrier screening has also been carefully considered at roadside and bund locations adjacent to Bradley Hall Cottages. The bunds will have maximum 1:3 gradient slopes, facing the cottages with 2.5-3m high acoustic fencing on parts of the bunds separating Bradley Hall cottages and Zone C and D. The side of the bund facing the proposed industrial units will be almost vertical, formed from Gabion walls or similar. The gabion wall will be within 1m of the car park edge and will continue around the perimeter of the car park to accommodate the bund. These bunds will be created during the site enabling phase of construction works.

The details of this Noise Mitigation is now shown on the Noise Mitigation Plan (Ref: 16-184 PI 14 Rev L).

- 2.66. As outlined in paragraph 2.21, the Council's Environmental Protection Services Manager has confirmed that the parameters (including details of bunds and acoustic fencing) detailed in the Addendum Noise and Vibration ES Technical Paper 7 now gives a greater level of reassurance that the Proposed Development could occur without incurring unacceptable adverse impacts on amenity, subject to detailed acoustic assessment mitigation proposals being submitted with any reserved matters application.

#### Heritage

- 2.67. Matters of cultural heritage and archaeology are considered within the ES and its Addendum. As part of this, a corpus of work has been undertaken to understand the Cultural Heritage context of the Site including the historic built form i.e. listed buildings, conservation areas, the archaeological resource and historic landscape.
- 2.68. This work has identified a number of archaeological sites and spots within the proximity of the Site. In addition, Bradley Hall moated site is a Scheduled Monument (SM) located within the Site boundary, to the eastern part of the Site, adjacent to the farm buildings. It comprises the buried and earthwork remains of a medieval moated site for a medieval manor house, which is to be retained. The moated island is partly occupied by the farm house associated with Bradley Hall Farm, which is excluded from the Scheduling.
- 2.69. The Heritage Parameter Plan (Ref: 16-184-PI 14 Rev G) seeks to identify a 30m stand-off and buffer between any built development and the moat which is a heritage asset. The existing Bradley Hall Farm building, which is a locally listed building (non-designated heritage asset), will be retained.
- 2.70. Any estate road which transverses the green corridor should be built into the levels of the site and not have street lighting to reduce impacts on the setting of the green corridor and SAM.
- 2.71. Comments have also been raised since the submission of the planning application by the Conservation Officer regarding the historical and architectural merit of the existing agricultural buildings that lie to the east of the Scheduled Monument, proposed for demolition. Further information has subsequently been submitted with the Cultural Heritage and

Archaeology ES Addendum Paper, which assesses the setting, condition, context and architectural detailing of these buildings and their relationship to the Scheduled Ancient Monument. The Conservation Officer has subsequently confirmed that she does not object to the removal of these buildings and that the buildings should be recorded in accordance with a planning condition on any outline planning permission.

- 2.72. The Applicant will also agree through the grant of any outline planning permission to cease use of the existing Bradley Hall Farm building, for residential purposes on the occupation of any proposed B2, B8 industrial units on the site, to remove any impact on residential amenity. Further change of use applications will be required to determine future uses of these buildings and ensure uses are complementary to the setting of these locally listed buildings and the setting of the SAM.

#### Demolition

- 2.73. This Demolition Parameters Plan (Ref: I6-I84-PI I8 Rev E) identifies the extent of the existing buildings on the Site proposed for demolition. These comprise of the complex of farm outbuildings associated with Bradley Hall Farm.

#### Ground Contamination & Contamination

- 2.74. The application is accompanied by a range of information relating to matters of ground. The Preliminary Geo-environmental Assessment that accompanies this submission has considered risks relating to development of the Site. The Site is recorded as being undeveloped historically, with the exception of Bradley Hall. However, it is understood from the Unexploded Ordnance (UXO) Assessment that part of the Site was used as a decoy during World War II.
- 2.75. Nevertheless, the Ground Assessment concludes that as the Site is greenfield with no significant sources of contamination identified, and there is no requirement for a significant import of materials to form finished levels, the Site is considered to not represent a significant environmental risk during either the construction or operational phases.
- 2.76. The proposed Site levels will be formed by a cut and fill balancing exercise across the Site and will tie in to existing boundary levels where possible. Cut and fill will be required to create the unit development platforms.

### Trees

- 2.77. There are a number of trees on the Site. A baseline Arboricultural Survey and Assessment has been submitted as part of this application (which is appended to the Landscape and Visual Impact ES Addendum Technical Paper 4). It has established that the tree stock across the Site is broadly made up of either moderate (Category B) or high landscape value (Category A) trees, which are generally in a good condition. The report recommends that buffer zones should be placed between new development and landscape features including Wrights Covert, Bradley Gorse and Bradley Hall moated site. Managed hedgerows both within and along the boundaries of the Site are generally mature and appear to be in a good condition.
- 2.78. The existing trees and mature hedgerows within the Site will be retained and enhanced where possible. Retained trees and woodlands blocks, particularly along the Site boundaries, will form an important part of mitigating the potential impacts of the new development. The landscape proposals will include new woodland belts on earth mounding along the Site boundaries and internal roads which with the SuDs will aim to enhance site-wide biodiversity and create new wildlife corridors.

### Lighting

- 2.79. An updated Baseline Lighting Assessment undertaken post submission at the request of statutory consultees has been undertaken and is included within Appendix 16 of the ES and its Addendum. It identifies how the Proposed Development will need to respond to lighting requirements (day and night) whilst also having regard to the impact within and outside of the Site and considers the night time impact of operational lighting. It is considered that this can be achieved at the detailed design strategy stage and secured by condition.

### Socio-Economic

- 2.80. The socio-economic case for Six 56 is set out in ES Technical Paper 6 and its Addendum. We set out details of this later in this Planning Statement, but the below are some of the key economic impacts:

#### *Construction Impacts*

- It is estimated that the Proposed Development will involve £180 million of construction expenditure, generating 1,762 gross direct person years of employment.

This would equate to 271 gross jobs on average per year over the construction period (6.5 years), or 139 net additional jobs in the Cheshire and Warrington LEP area.

#### *Operational Impacts*

- Once the Proposed Development has been fully occupied, the scheme could create some 4,113 gross direct FTE jobs. After allowing for leakage, displacement, deadweight and multiplier effects, it is anticipated that the net additional impact at the Cheshire and Warrington LEP level will be 2,342 FTE jobs.
- A moderate adjustments of between 10% and 15% may be required for future developments over the next 10 to 15 years to reflect continued investment in automation across the sector, however for the time being, the assessment of gross FTE jobs is still based on the most up-to-date employment density benchmarks published by the former HCA.
- Evidence suggests that the occupations with the highest estimated automation potential typically only require basic to low level of education. On this basis, higher skilled activities are likely to be largely retained. The investment in automation could also hav positive effect on employment volume as a larger workforce (e.g. drivers and other staff) is needed to dispatch the greater number of parcels sorted per hour.
- The Proposed Development could generate £210 million of net additional GVA per annum within the Cheshire and Warrington LEP area.

2.81. The Addendum Socio economic ES Technical Paper 6 seeks to respond to comments raised by consultees regarding the longer-term employment prospects and the socio-economic impacts within the logistics sector, given the role of expected increased automation in the logistics sector in future years.

2.82. In terms of automation, the findings of an empirical review into wider research concludes that 'It may be reasonable to apply a moderate adjustment of between 10% and 15% future developments over the next 10 to 15 years to reflect continued investment in automation across the sector. From the point of full employment, this would equate to an annual reduction in onsite jobs of between 30 and 60 per annum over the period.

- 2.83. The evidence suggests that local productivity / income effects are significant and sufficient to at least compensate for the loss of employment in part. On this basis, any future reduction in the level of GVA as a result of automation would not be equivalent to decline in direct onsite employment.
- 2.84. Although this has not been reassessed within the Addendum Socio economic Technical Paper overall results show no major discernible differences in the levels of significance claimed in the Socio-economic Paper and the Application Proposals will still deliver a Moderate Positive impact during construction and a High / Substantial Positive impact when operational.

#### Air Quality

- 2.85. An Air Quality Assessment has been undertaken in respect of the Site and consideration given to the impacts of the Proposed Development during both during the construction and operational phases. Consideration is also given to odour and dust. This is considered in the ES Technical Paper 8.

#### Utilities

- 2.86. As part of the Site constraints and opportunities exercise, existing and proposed utilities requirements were identified. There are numerous cables and other infrastructure within the ground that cross the Site. However, none are envisaged to represent a significant constraint on development. The service arrangements are considered within ES Technical Paper 10.

#### Waste

- 2.87. Matters of waste are set out within ES Technical Paper 12. It considers potential impacts arising from both the construction and operational phases of the development.

#### Energy

- 2.88. Matters of energy are considered in the ES Technical Paper 11. New infrastructure requirements such as capacity and on-plot substations have been considered. Discussions have been held with the relevant energy providers regarding energy requirements and Site connectivity.



- 2.89. A separate standalone Greenhouse Gas (GHG) assessment for the Proposed Development has now also been undertaken at the request of the Council and has regard the NPPF which calls for projects to take a proactive approach to climate change mitigation and adaptation, to help reduce greenhouse gas emissions, such as through its location, orientation and design.
- 2.90. This Assessment undertaken by Cundall quantifies the likely GHG emissions associated with operation of the Proposed Development consistent with the requirements of Section 14 of the Framework, proposing a series of best practice materials and potential changes to the construction methods that could reduce the proposals embodied carbon and would support a transition to a low carbon future and reductions in greenhouse gas emissions, thereby reducing its environmental impact.

### **3. Relevant Planning History**

- 3.1. There are no planning applications on the Application Site which are directly relevant to the Proposed Development. However there are two planning applications (2017/31757 and 2019/34739) for a National Distribution Centre submitted by Liberty Properties Development Ltd & Eddie Stobart in 2017 and 2019, on land neighbouring the Application Site which were dismissed by the Secretary of State in November 2020. The relevance of these decisions is considered in more detail in Section 6 of this Replacement Planning Statement.

## 4. Stakeholder Engagement Summary

### Overview

- 4.1. This section sets out the statutory and non-statutory consultation undertaken, including consultation with the local community, local stakeholders and pre-application discussions with the local authority. This is known as the Statement of Community Involvement document.
- 4.2. The National Planning Policy Framework, 2019 (NPPF (19)) sets out the Government's approach to engagement with stakeholders with an increased emphasis on the role of community involvement in the planning process and the importance of quality early engagement with the Local Planning Authority as essential to good planning and improved outcomes for the community.
- 4.3. Encouragement to engage with the Local Planning Authority and local community before a planning application is submitted is provided at Paragraph 40 of NPPF (19). Paragraph 41 advises that the more issues that can be resolved at the pre-application stage, the greater the benefit. Therefore, for the process to be effective and positive, statutory consultees are advised by NPPF (19) to take an early, pro-active approach and provide advice in a timely manner.
- 4.4. The NPPF (19) states at Paragraph 40 that:

*[Local Planning Authorities] should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications.*

- 4.5. The NPPF goes on to explain in paragraph 132 that “*applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*”.

## **Warrington Borough Council Statement of Community Involvement**

- 4.6. The Statement of Community Involvement (SCI), 2014 (including factual amendments (2016)) explains how the community and organisations can take part in the planning process. It sets out how the Council will engage with people and organisations involved in the preparation and review of the Local Plan and in considering planning applications for the area of Warrington Borough Council.

### **Engagement Objectives**

- 4.7. The following engagement objectives were identified:

To undertake early engagement with the Local Planning Authority

To provide an opportunity for the Local Planning Authority to feedback on emerging proposals for the Site to address any matters prior to submission

To provide an opportunity for members of the local community to feedback on emerging proposals for the Site

- 4.8. The application proposals have been subject to significant consultation with both public and statutory undertakers. The consultant team have been liaising with Warrington Council and surrounding authorities in formulating the proposals. The consultant team has been facilitated by a specialist communications company Newgate who have produced a Statement of Community Involvement which supports this application.
- 4.9. Engagement has continued throughout the application process following consultee responses and issues raised.
- 4.10. The application is subject to EIA and a formal ES Scoping Opinion was sought from Warrington Council. A formal response was received from them. This is set out in more detail within the ES itself.

## Engagement with the Local Planning Authority and Statutory Bodies

- 4.11. Extensive engagement has been undertaken with all levels of Warrington Council. This has included a number of meetings and close liaison with the Planning Team. The meetings have considered the principles for development as well as highlighting concerns and agreeing approaches to collating supporting information.
- 4.12. As indicated above, a formal ES Scoping submission was submitted to Warrington Council and a wide range of relevant statutory bodies were actively engaged and consulted by both the consultant team and the Council. Details of this approach are contained within the relevant chapters of the ES.
- 4.13. In formulating the development proposals, extensive consultation has also been undertaken with a range of statutory and non-statutory bodies.
- 4.14. The Applicant has also met with the Leader and Deputy Leader and Chief Executive of the Council and a range of stakeholders including the Cheshire and Warrington LEP, Warrington and Co. and the Construction Industry Training Board (CITB) to discuss the proposals in advance of the submission of this planning application.
- 4.15. Since the application has been submitted, most consultee responses have been received. The ES Addendum and updated package of information (including this Replacement Planning Statement) responds to the issues raised by consultees.
- 4.16. Since the submission of the planning application, consultation responses have been received from key consultees and further discussions have taken place with the Council and their key consultees (namely WBC Highway Officers, National Highways (formerly Highways England (HE)) and their consultants Atkins, WBC Environmental Protection Officers, Historic England and WBC Conservation Officer and Ramboll landscape designers acting on behalf of WBC).
- 4.17. Further clarification and information has been provided in line with requests by National Highways (formerly Highways England) and WBC Highway's Officer relating to the design of the mitigation and the WMMTM traffic model.
- 4.18. WBC Environmental Protection expressed concerns with exposure to high noise levels that will be experienced at existing properties on Cartridge Lane and sensitive receptors within

the site comprising Bradley Hall Cottages and Bradley View to potentially unacceptably high noise levels, even with mitigation in place, based on the worst case estimates of the proposals as illustrated on the submitted masterplan and parameters plans.

- 4.19. Landscape Consultants Ramboll's acting on behalf of the Council have also recommended further supplementary information, including an assessment of potential effects on the visual amenity of properties in the vicinity, in order to provide greater transparency to the LVIA and its findings and to aid WBC in its determination of the application.
- 4.20. Consequently, the illustrative masterplan and parameters plans have evolved to address comments raised by these key consultees and reduce the noise impacts on sensitive receptors within the site with realignment of estate roads and other minor amendments including details of the highway access into the Site.
- 4.21. Further assessments have also been undertaken in respect of noise and vibration and landscape and visual impacts and cultural heritage. The ES First and Second Addendum therefore includes additional and updated information to address these comments raised by key consultees. The Council's Environmental Protection team have subsequently confirmed that this resolves their previous concerns.
- 4.22. In respect of landscape character and visual impact, the Applicant has now reduced some of the building heights outlined in the building zones illustrated on the Building Heights Parameters Plan, which are the highest and most dominant features of the proposals. A revised Heights Parameters Plan Drawing No. 16-194 P115 Rev H reduces the maximum building height in Zone B2 from 43.5m to ridge (40m clear internal height) to 30m to ridge (26.5m clear internal height), which relates to Plot 4 of the Illustrative Masterplan and Zone D1 and D2 from 24.5m to ridge (21m clear internal height) to 22m to ridge (18.5m clear internal height), which relates to Plots 2 and 3 of the Illustrative Masterplan. This should now address any effects on landscape character or visual amenity and minimise any significant effects.
- 4.23. The outline planning application description of development now includes the removal of any change of use of Bradley Farmhouse to B1 (a) office use. Any change of use of this building will be dealt with separately at a later following the grant of any outline permission, once prospective uses of this building have been fixed. To mitigate any impact on any residential amenity associated with noise emanating as a result of the proposed Six 56 employment

development, the applicant will agree to cease use of this building for residential purposes on commencement of development.

- 4.24. Amendments have now been made to the detailed design of the mitigation package of works to junction 20 of the M6, including rationalisation of lane markings; works to carriageway widths on the Grappenhall Lane/A50 roundabout and updates to the M6 Junction 20 Base Model to reflect discussions with HE and WBC Highways.
- 4.25. Minor amendments have been made to the Parameters Plan and updates to relevant sections of the ES First Addendum to reflect agreements to provide a commuted sum towards continuing shared cycleway/footway beyond the Application boundary and safeguarding a section of the Applicants land, adjacent to Grappenhall Lane to facilitate any future road widening and improvements required on Grappenhall Lane. Agreement has also been reached with WBC Highways on a commuted sum of £600,000 towards improve bus services via a S106 financial obligation.
- 4.26. Minor amendments have been made to the illustrative masterplan and Cut and Fill Finished Levels Contour Plan to illustrate amendments to location of landscape bunds and proposed Parameter Plans have now been made to reduce noise levels adjacent to the Cottages to an acceptable noise level and consequential changes to other plans, including the green infrastructure, drainage and noise parameter plans to reflect concerns raised by the Council's Environmental Protection team and comments raised by GMEU regarding ecological mitigation and the number and function of replacement ponds.
- 1.1. A green corridor and view corridor will also now be maintained from north to south within the Site to retain an open corridor around the Bradley Hall moated site and through the Site and the updated illustrative masterplan and updated parameters plans highlights the need for proposed estates roads through this green corridor to be constructed to minimise any impact of views through this corridor and impacts on the setting of the SAM.

## Community Engagement

- 4.27. This section identifies the community consultation undertaken. A more detailed summary of the Community Engagement undertaken is provided within the Statement of Community Involvement (SCI) included with this planning submission.

- 4.28. The first workshop events were held over two days at Grappenhall Community Centre in October 2018. The two workshops were attended by around 180 people. The workshops were extremely helpful in highlighting the issues that are most important to local people. The Applicant have also worked with Warrington Borough Council Officers and other consultees to ensure that the solutions developed for the Site work for the whole of Warrington and the surrounding area.
- 4.29. Following the consultation events in October 2018, further technical and design work was undertaken to consider those key matters and evolve the scheme. This included addressing the highways impacts, landscaping, maximum building heights (the specific design details of the buildings is not being applied for, but the scheme is guided by parameters, which set a maximum building height). Further detailed traffic modelling and design work has been undertaken to address and mitigate off site highway capacity concerns.
- 4.30. The second events were held on Thursday 7th March, 2-7pm at Grappenhall Community Centre and Friday 8th March, 12-5.30pm at the Customer Information Point, Golden Square Shopping Centre, Warrington. Further information regarding the proposals and the technical information supporting the proposals was displayed, providing the opportunity for members of the community to discuss any issues and provide feedback, which would be considered by the Applicants consultant team and where appropriate inform any changes to the proposals prior to submission of the planning application. Many people recognised the additional highways, environmental and technical mitigation that has been brought forward since the October 2018 consultation.
- 4.31. A record of all the comments and issues raised during the consultation events is included within the SCI submitted with the Application.
- 4.32. In summary, the consultation strategy adopted has given an opportunity for the development team to explain and present information to the community concerning the proposals and allowed the needs of Langtree PP and Panattoni, Warrington Borough Council and the local community to be considered in a balanced manner. The feedback from the community has been valuable and has directly influenced the scheme evolution as identified above.



## 5. Statutory Policy Context and Other Relevant Policies

- 5.1. Section 38 of the Planning and Compulsory Purchase Act 2004, states that applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2. The National Planning Policy Framework (NPPF (21)) is a material consideration in the determination of applications and this establishes at paragraph 219, that weight should be given to relevant policies in existing Development Plans according to their degree of consistency with The Framework (the closer the policies in the plan to the policies in NPPF (21), the greater the weight that may be given).

### Statutory Development Plan

- 5.3. The statutory Development Plan for the consideration of this application comprises:

- Adopted Local Plan Core Strategy (July 2014) (CS)
- Appleton Thorn Ward Neighbourhood Development Plan (June 2017) (NP)

The High Court Challenge to the adoption of parts of the Warrington Local Plan Core Strategy was heard on 3 and 4 February 2015 with judgement given on 19 February 2015 by Mr Justice Stewart. The Judge ruled in favour of the Council on six of the nine issues that the claimant challenged on. The outcome resulted in the removal of elements of the housing policies from the Local Plan. The parts of the Plan which have been overturned are:

- The housing target of 10,500 new homes (equating to 500 per year) between 2006 and 2027; and
  - References to 1,100 new homes at the Omega Strategic Proposal.
- 5.4. Not all of the Local Plan Core Strategy has been overturned. All other policies within the plan remain unaltered

**Site Specific Allocation**

5.5. The Adopted Core Strategy (2014) Proposals Map currently identifies the Site as Green Belt land, shown on the extract below by the green wash. It also identifies that there is a public right of way (PROW) running through the Site, which is shown by the dark green dashed line. Further to the centre of the Site is the Bradley Hall ancient monument.

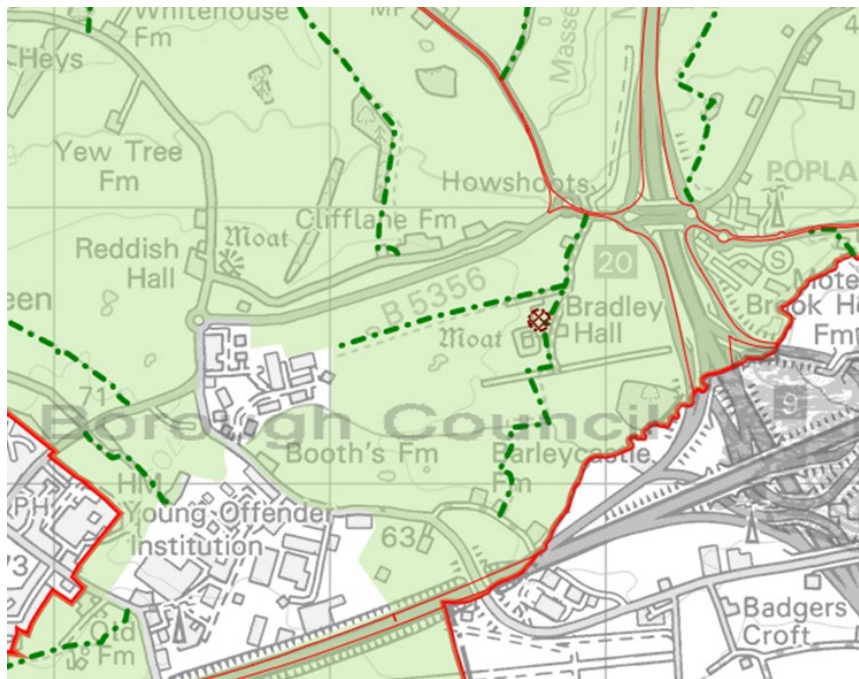


Figure 7 – Extract from the Warrington Local Plan: Core Strategy Proposals Map

5.6. The Site is adjacent to the Appleton & Stretton Trading Estates (collectively known as Barley Castle Trading Estate, which located to the west and south west of the Site). These Trading Estates are identified within the Core Strategy as a preferred location for major warehousing and distribution development (Key Diagram - below). The Core Strategy Policy PVI identifies that the borough has three main major warehousing and distribution locations at Appleton & Stretton Trading Estates, Omega and Woolston Grange and that it is appropriate to continue to direct such development towards these locations due to their proximity to the motorway.

- 5.7. Appleton & Stretton Trading Estates are specifically recognised within the Core Strategy as a key distribution location as it is ‘ideally located approximately 1.5 miles from Junction 20 of the M6 motorway and Junction 9 of the M56 motorway’ (Core Strategy P139). Nevertheless, the Core Strategy identifies that few development opportunities remain within Barley Castle Trading Estate.



**Figure 8 – Extract from the Warrington Local Plan: Core Strategy Key Diagram**

- 5.8. As a result, there is a clear recognition within the Core Strategy of the strategic importance of the land around the M6 and M56 interchange for accommodating major warehousing and distribution developments within the Borough.

### **The Warrington Local Plan Core Strategy, July 2014**

- 5.9. The Warrington Local Plan Core Strategy was adopted in July 2014 and provides the spatial context from which more detailed policies and site allocations should follow. In October 2016 Warrington Council agreed to carry out a comprehensive review of the Local Plan Core Strategy in response to the results of the High Court Challenge and the emerging evidence which set out the Borough’s growth ambitions and housing and employment needs to reflect these aspirations. The revised evidence base and the commitment of the Council to review

their Core Strategy are material considerations in the context of this application, but the Core Strategy remains the statutory development plan in the context of Section 38 of the Act until such time as it is replaced.

5.10. The Core Strategy sets out the problems, issues and challenges facing Warrington in particular the high levels of deprivation in some parts of the borough. The Core Strategy states that the 2010 Indices of Multiple Deprivation (IMD) identify that there are 11 Warrington Super Output Areas (SOAs) which fall into the 10% most deprived nationally - a figure which has not changed from 2007.

5.11. The Core Strategy also recognises that Warrington has a strong and resilient economy and it is a highly performing location on a national basis. The Vision states:

*'The town continues to be a key economic driver for the surrounding area and its pivotal location within the 'Atlantic Gateway' is an advantage to residents and businesses and gives them unrivalled access to both the Manchester and Liverpool conurbations and national transport infrastructure.*

*The borough is home to a highly skilled workforce that serves the local economy well and the town continues to be a focus for employment for a wide area - reinforced by the development of significant sites in and immediately surrounding the borough.'*

5.12. In line with the Strategic Vision, the strategic objectives include supporting growth in the local and sub-regional economy, maintaining the permanence of the Green Belt, securing high quality design and minimizing the impact on the environment.

5.13. Policy CSI: Overall Spatial Strategy – Delivering Sustainable Development sets out that development proposals that are sustainable will be welcomed and approved without delay. It goes on to say that in order to be sustainable, a development must accord with national and local planning policy, taking into account other material considerations, and must have regard to a number of principles. These principles include providing for recognised and identified development needs, the protection of the Green Belt and the character of the countryside, the need to sustain and enhance the borough's built heritage, biodiversity and geodiversity, the need to safeguard environmental standards, public safety, residential amenity, the delivery of high standards of design and construction, and the need to improve equality of access and opportunity.

- 5.14. Policy CS2: Overall Spatial Strategy - Quantity and Distribution of Development set outs the principles behind the distribution of development within the borough. It stipulates that the main focus for other business, general industrial and storage/distribution development (B1/B2/B8) will continue to be the existing employment areas of the town principally Birchwood Park, Gemini and Winwick Quay, together with further sites at Woolston Grange and the strategic location of Omega and Lingley Mere. It also states that within the Green Belt area, development will only be allowed where it is considered to be appropriate in accordance with National Policy. Nevertheless, the policy also highlights that major warehousing and distribution developments will be located away from areas sensitive to heavy vehicle movements, with direct access to the primary road network, where possible with access to rail and/or the Ship Canal. The planning application is seeking permission for a major warehousing and distribution development (B8 with ancillary B1(a)) on land adjacent to the Barleycastle and Stretton Green Trading Estates. The Application Site and has direct access onto the primary network and is not in an area sensitive to heavy vehicle movements.
- 5.15. Policy CS 4: Overall Spatial Strategy – Transport importantly recognises Warrington’s role as a regional transport gateway/interchange. The policy requires development to be located in areas where there is an opportunity to reduce travel especially by car as well as enable people as far as possible to meet needs locally. A Framework Travel Plan accompanies this application, which seeks to minimise the level of traffic associated with staff trips, single occupancy trips and to promote sustainable modes of travel. Measures detailed in the Travel Plan will help to mitigate the impacts of the traffic associated with the Development Proposals.
- 5.16. Policy CS 5: Overall Spatial Strategy – Green Belt states that the integrity of the Green Belt is to be preserved across the entirety of the plan period and beyond. The policy considers that there are sufficient contingencies in place within the Local Plan Core Strategy to ensure that the protection of Green Belt is sustainable in the long-term and therefore there is no need to review the Green Belt during the plan period. It stresses that this approach does not compromise growth aspirations during or beyond the plan period. However, it does go on to say that development proposals within the Green Belt will be approved where they accord with relevant national policy.

5.17. The Core Strategy also contains various general policies that relate to a range of planning issues, these include:

Policy	Summary
Policy PV 1 Development in Existing Employment Areas.	The policy states that sustainable development within other areas (outside of existing employment areas) will be supported.
Policy PV3 Strengthening the Borough's Workforce	The policy states that Council will support developments which assist in strengthening the boroughs workforce and enhancing training opportunities for its residents by maximising the social benefits from proposals which contribute to the Council's "Closing the Gap" agenda by securing local employment opportunities associated with the construction and subsequent operation of new development (amongst other things).
Policy SN6 Sustaining the Local Economy and Services	The policy states that the Council will assist the continued viability and growth of the local economy and support the sustainability of local communities.
Policy SN7 Enhancing Health and Wellbeing	The policy seeks to reduce health inequalities and promote healthy lifestyles. It requires that proposals address health and wellbeing inequalities through a number of different initiatives such as employment and training, maximizing opportunities for exercise and active lifestyles and deterring crime and increasing resilience to climate change.
Policy QE1 Decentralised Energy Networks and Low Carbon Development	The policy seeks to encourage proposals that maximise opportunities for the use of decentralised renewable and low carbon energy.
Policy QE 3 Green Infrastructure	The policy seeks to develop and adopt an integrated approach to the provision, care and management of the borough's Green Infrastructure. This will involve protecting and enhancing the functionality and quality of existing provision and securing new provision where possible.
Policy QE4 Flood Risk	The policy states that the Council will only support development proposals where the risk of flooding has been fully assessed and justified by an agreed Flood Risk Assessment. The policy goes on to state a preference for the use of Sustainable Drainage Systems.
Policy QE5 Biodiversity and Geodiversity	The policy seeks to protect and where possible enhance sites of recognised nature and geological value. It goes on to say that development proposals affecting protected sites, wildlife corridors, key habitats or priority species (as identified in Local Biodiversity Action Plans) should be accompanied by information proportionate to their nature conservation value.

<p>Policy QE6 Environment and Amenity Protection</p>	<p>The policy states that the Council will only support development which would not lead to an adverse impact on the environment or amenity of future occupiers or those currently occupying adjoining or nearby properties, or does not have an unacceptable impact on the surrounding area. It goes on to state the consideration will be given to a number of matters including quality of water bodies, groundwater resources, land quality, air quality, noise and vibration levels, light pollution, amongst other matters.</p>
<p>Policy QE7 Ensuring a High-Quality Place</p>	<p>The policy states that the Council will look positively upon proposals that are designed to be sustainable, durable, and adaptable and energy efficient; create inclusive, accessible and safe environments; and are visually attractive as a result of good architecture and the inclusion of appropriate public space, amongst other things.</p>
<p>Policy QE8 Historic Environment</p>	<p>The policy seeks to protect the fabric and setting of heritage assets.</p>
<p>Policy MP1 General Transport Principles</p>	<p>The policy states that the Council will support proposals where they mitigate the impact of development or improve the performance of Warrington's Transport Network, including the Strategic Road Network, by delivering site specific infrastructure which will support the proposed level of development.</p>
<p>Policy MP3 Active Travel</p>	<p>The policy requires high priority to be given to the needs and safety of pedestrians and cyclists in new development. It goes on to state that new development should contribute to enhancing and developing integrated networks of continuous, attractive and safe routes for walking and cycling including improvements to roads, Rights of Way and the Greenway Network.</p>
<p>Policy MP4 Public Transport</p>	<p>The policy requires high priority to be given to the needs and safety of pedestrians and cyclists in new development. It goes on to state that new development should contribute to enhancing and developing integrated networks of continuous, attractive and safe routes for walking and cycling including improvements to roads, Rights of Way and the Greenway Network.</p>
<p>Policy MP5 Freight Transport</p>	<p>The policy states that proposals for freight related development will be supported where they achieve a reduction in road traffic kilometres through their location and/or where they reduce the impact of freight traffic on local or inappropriate route. It goes on to state that proposals should demonstrate that they would not have an adverse impact in terms of heavy goods vehicles using local or residential roads or congested central areas as well as unacceptable problems of noise, vibration, lighting, emissions, or other pollution for neighbouring occupiers.</p>

<p>Policy MP7 Transport Assessments and Travel Plans</p>	<p>The policy requires that all developments demonstrate they will not harm highway safety and identify any significant effects on the transport network. It goes onto state that proposals which would prejudice the primary function of the Strategic Road Network will not be allowed unless improvements are designed and carried out. Finally it says that all major developments need to be accompanied by a Transport Assessment and Travel Plan.</p>
<p>Policy CC2 Protecting the Countryside</p>	<p>The policy states that development proposals in the countryside which accord with Green Belt policies set out in national planning policy subject to a number of considerations.</p>

Figure 9 – Relevant Core Strategy Policies

### The Appleton Thorn Neighbourhood Development Plan to 2027, June 2017

- 5.18. The Site lies within the boundaries of the Appleton Thorn Neighbourhood Plan. The designated area includes Appleton Thorn, Wrights Green, Appleton Cross, Bradley Hall area, Barleycastle and Stretton Trading Estates, and H.M.P. Thorn Cross.
- 5.19. The Neighbourhood Plan states that the ward is rural in character and is constrained with limited capacity to develop the services and the infrastructure requirements to support significant development. It also identifies that the local road network struggles to cope with the traffic coming and going to the trading estates and nearby motorways. The Neighbourhood Plan recognises within paragraph 6.1.4 that the Council is unable to identify sufficient land to meet its likely housing need in accordance with NPPF (19) and hence that “The Council will need to undertake a more fundamental review of the Plan ....to enable the Council to assess the options for and implications of meeting its housing needs in full”. This paragraph was inserted in response to the Examiners conclusions and hence shows that the Neighbourhood Plan was “made” within a context of reduced development requirements within Warrington and on the understanding that such requirements could be significantly increased.
- 5.20. The Neighbourhood Plan identifies a number of objectives that are relevant to the Proposed Development, which are:



- To ensure that all new development is high quality and sustainable as well as that it reflects the character and heritage of the designated area;
- To protect the heritage assets of the designated area;
- To protect and enhance the landscape and setting of the designated area;
- To ensure that all traffic and transport issues are addressed especially with respect to safety, speed and congestion;
- To promote safe walking and cycle routes both within the designated area and to nearby towns and villages;
- To support services and other businesses providing employment opportunities.

5.21. The most relevant policies within the Neighbourhood Plan are:

Policy	Summary
Policy AT-D1	Design of Development in Appleton Parish Thorn Ward
Policy AT-D2	Protecting and enhancing local landscape character and views
Policy AT-D3	Flood Risk, Water Management and Surface Water Run-Off
Policy AT-TH1	Traffic Management and Transport Improvements
Policy AT-TH2	Sustainable Transport Measures
Policy AT-E1	New Local Employment Opportunities

Figure 10 – Relevant Appleton Thorn Neighbourhood Plan Policies

### National Planning Policy Framework, July 2021

5.22. The three overarching objectives of the planning system (paragraph 8) comprise balancing of economic, social and environmental objectives. The economic objective seeks to ensure that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

- 5.23. The economic objective is supported by the need to create the conditions in which businesses can invest, expand and adapt (paragraph 81). The same paragraph confirms that significant weight should be placed on the need to support economic growth and productivity and that each area should build on its strengths, counter any weaknesses and address the challenges of the future. The specific locational requirements of different sectors should be recognised and addressed by both planning policies and decisions which includes making provision for “*storage and distribution operations at a variety of scales and in suitably accessible locations*” (paragraph 83).
- 5.24. In terms of accessible locations, paragraphs 104 and 105 promote sustainable transport and require that “*significant development should be focused on locations which are or can be made sustainable*”. Proposals for new or expanded distribution facilities should make provision for lorry parking facilities (paragraph 109) and appropriate opportunities should be taken to promote sustainable transport modes (paragraph 110). Development should only be refused on highways grounds where it would have an unacceptable impact on highway safety or the residual cumulative impacts on the road network will be severe (paragraph 111).
- 5.25. In terms of “*Protecting Green Belt land*” (Chapter 13), the fundamental aim of Green Belt policy is “*to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*”. Paragraph 138 confirms the five purposes which Green Belt serves and paragraph 147 states that by definition, inappropriate development is harmful to the Green Belt and should “*not be approved except in very special circumstances*”. Paragraph 148 advises that local planning authorities should give substantial weight to any harm to the Green Belt. It notes that “*very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations*”.
- 5.26. The Natural Environment is addressed in Chapter 15. Paragraph 174 seeks to protect and enhance “*valued landscapes*”; minimise impacts upon biodiversity; prevent new development from contributing to unacceptable levels of pollution; and remediate despoiled, degraded, derelict and contaminated land.
- 5.27. Paragraph 179 seeks to promote the conservation, restoration, and re-creation of priority habitats and identify and pursue measurable net gains for biodiversity. Paragraphs 179-182 set out the principles that should be applied when determining planning applications, including biodiversity, noise, and land stability.

- 5.28. Paragraphs 189-208 set out the position with regard to Heritage assets. Paragraph 194 outlines that the applicant should sufficiently describe the significance of any heritage asset affected, including any contribution made by their setting as part of a planning application. It notes that the heritage assets should be assessed using heritage expertise where necessary. Paragraph 194 and paragraph 195 relate to the approach local planning authorities should take when identifying and assessing the significance of heritage assets and the contribution of new development to the local character and distinctiveness of the heritage asset. Paragraph 199 attaches great weight to the asset's conservation when considering the impact of development on the significance of the designated heritage asset. It notes the *"more important the asset, the greater the weight should be"*. Paragraph 200 indicates that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. Paragraph 202 outlines the approach to take where harm is considered to be less than substantial, *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*
- 5.29. In respect of the process for determination of a planning application, the 2021 Framework explains in paragraph 9 that the planning system should play an active role in guiding development to sustainable solutions and in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area, whilst paragraph 10 states that *"at the heart of the Framework is a presumption in favour of sustainable development"*.
- 5.30. Paragraph 11 sets out that in relation to decision taking this means:

- *Approving development proposals that accord with an up-to-date development plan without delay; and*
- *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 
  - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

- 1.2. Footnote 7 sets out those specific policies which indicate development should be restricted.
- 1.3. In relation to decision making, paragraph 38 states that “*Local planning authorities should approach decisions on proposed development in a positive and creative way*”, and that “*decision makes at every level should seek to approve applications for sustainable development where possible*”. This includes working proactively with applicants to “*secure developments that improve the economic, social, and environmental conditions of the area*”.
- 1.4. In determining applications, paragraph 47 requires that “*applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise*”. Paragraph 49 confirms that “*arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:*
- *The development proposed is so substantial, or its cumulative effect would be so significant, that to grant planning permission would undermine the plan-making process by predetermining decisions about the scale, location and phasing of new development that are central to an emerging plan; and*
  - *The emerging plan is at an advanced stage but is not yet formally part of the development plan for the area*”.
- 1.5. Paragraph 219 states that “*Existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given*

*to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)."*

- 5.31. The NPPF (21) is a key material consideration as the statement of national policy and should be taken into account and given appropriate weight when assessing this application.

### **National Planning Practice Guidance (PPG)**

- 5.32. The National Planning Practice Guidance (PPG) provides guidance to support the policies within NPPF (21), and in that sense does not provide additional policy but rather more detailed consideration of how policies within The Framework should be approached and met. The guidance covers all relevant planning policy areas under separate topics and will be updated online as and when required.
- 5.33. The follow sections are particularly relevant to the application proposal:-

#### **What is the role of parameter plans in achieving well-designed places?**

Parameter plans can include information on the proposed land use, building heights, areas of potential built development, structure of landscape and green infrastructure, access and movement and other key structuring and placemaking components. They can be prepared to inform an environmental impact assessment, where one is required to accompany an outline application.

Parameter plans can provide elements of the framework within which more detailed design proposals are generated, but they are not a substitute for a clear design vision and masterplan, and need to be used in a way that does not inhibit the evolution of detailed proposals. For example, setting maximum parameters for aspects such as building heights can still allow flexibility in determining the detailed design of a scheme.

Paragraph: 011 Reference ID: 26-011-20191001

Revision date: 01 10 2019

#### **What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?**

Assessing the impact of a proposal on the [openness of the Green Belt](#), where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;

- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

Paragraph: 001 Reference ID: 64-001-20190722

Revision date: 22 07 2019

### **How can authorities assess need and allocate space for logistics?**

The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:

- engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
- analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;
- analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and
- engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.

Strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).

Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of ‘last mile’ facilities serving local markets. A range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability.

Paragraph: 031 Reference ID: 2a-031-20190722

Revision date: 22 07 2019

### **How can the specific locational requirements of specialist or new sectors be addressed?**

When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies. For example, this might include the need for greater studio capacity, co-working spaces or research facilities.

These needs are often more qualitative in nature and will have to be informed by engagement with businesses and occupiers within relevant sectors.

Paragraph: 032 Reference ID: 2a-032-20190722

Revision date: 22 07 2019

## **Other Relevant Policies**

### **Emerging Local Policy – Warrington Updated Proposed Submission Version Local Plan 2021 – 2038, September 2021**

- 5.34. Warrington Council consulted on their Local Plan Preferred Development Option Regulation 18 documents in September 2017. The Preferred Development Option identified four main areas of growth – the City Centre, the Waterfront, a Garden Suburb in the south east of the Borough and a South West Urban Extension. The south eastern extension of Warrington sought to create a new Garden Suburb, providing the potential development of around 7,400 new homes, and a major new employment area as an extension of the existing Appleton Thorn / Barleycastle estates at the intersection of the M6 and M56 which included the Application Site which was identified for employment use.
- 5.35. The Proposed Submission Version Local Plan (April 2019) continued to identify a new Garden Suburb to the south east of the main urban area, and the Garden Suburb Employment Area (116ha), which included the Proposed Development Site.
- 5.36. The Updated Proposed Submission Version Local Plan (2021-38) (Update Local Plan) was issued in September 2021 and is being consulted upon during October and November. The Council updated its evidence base to re-establish Warrington’s future development needs and

subsequently re-assessed the Plan's spatial strategy and potential allocation sites. It is the most recent statement of the council's intentions with regard to the scale and disposition of development required to meet the objectively assessed needs to the period up to 2038.

- 5.37. The Update Local Plan identifies a need for 316.26 ha of employment land between 2021 and 2038 based upon an updated Economic Development Needs Assessment (EDNA) completed in August 2021. The Update Local Plan confirms that a detailed assessment of urban capacity has been undertaken and that there is a realistic urban supply of employment land of 38.87 ha. Taking account of an agreement with St Helens Council that a 31.22 ha extension to the west of Omega is counted towards Warrington's employment supply (even though it is within St Helens), then this leaves a residual shortfall of 246.17 ha.
- 5.38. The Update Local Plan confirms in paragraph 3.3.22 that all potential employment sites were assessed "with regard to their ability to meet market demands and against a range of detailed site and sustainability criteria, including location, means of access and Green Belt performance. A further key consideration was how the sites related to the emerging spatial strategy of the Plan and to planned infrastructure".
- 5.39. In light of this assessment the Update Local Plan confirms:-
- 3.3.23 The main employment sites have been allocated at:
- Fiddlers Ferry Power Station (101.0 ha Gross) – Redevelopment of the former brownfield Power Station site to the west of the borough, to provide for a mix of industrial and distribution uses.
  - South East Warrington Employment Area (136.92 ha Gross) – this is located at the junction of the M6 and M56 and will meet a large proportion of the Borough's identified B8 requirement.
- 5.40. This confirms the Application site remains an allocated site and forms part of the South East Warrington Employment Area (137 ha).



5.41. The Update Local Plan confirms that in light of a recently updated evidence base which includes both an assessment of the overall need for employment and the suitability of alternative sites, that the application Site is one of only two key draft employment allocations to meet that need. These two draft allocations are shown on the Local Plan Key Diagram below:

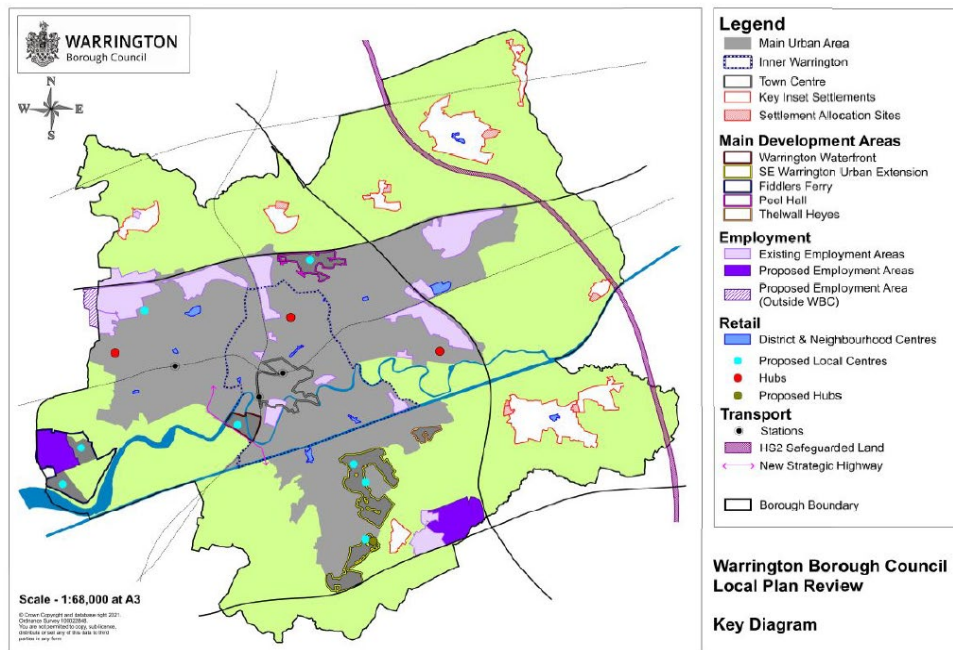


Figure 3 – Local Plan Key Diagram 46

5.42. Other changes include: a reduction of the Plan’s housing requirement and the removal of some of the previous Green Belt allocation sites; and the reduction in size of the South East Warrington Urban Extension (previously known as the Garden Suburb), which will deliver around 2,400 homes in the Plan period up to 2038, with a potential for a further 1,800 homes beyond the Plan period.

5.43. The Council expect to review the implications of these matters following consultation and expect to progress their Local Plan to Submission stage in March 2022.

5.44. A more detailed assessment of the justification for this conclusion will be provided in Section 6 of this Replacement Planning Statement but it is clear from the above that the application Site has formed part of the proposed employment supply within each version of the emerging Warrington Local Plan since 2017 and hence that it is a fundamental element of the future strategy for Warrington to meet its employment needs.

- 5.45. The adopted Core Strategy remains the statutory development plan until such time as the new Local Plan is adopted, however it is clear from the emerging Local Plan and its very recent evidence base that the urban area is no longer able to accommodate Warrington's full housing and employment needs and that the application Site forms a key component of the future employment land supply.

#### **Relevant Local Supplementary Planning Guidance Documents**

- 5.46. Warrington Borough Council has produced a number of Supplementary Planning Documents some of which are considered relevant to this application:
- Parking Standards SPD (March 2015) – this SPD sets out the Council's parking standards policy.
  - Environmental Protection SPD (May 2013) – this SPD sets out the approach in respect to environmental protection including, amongst other things, contaminated land, air quality, light pollution, noise and vibration.
  - Design and Construction SPD (October 2010 – amended February 2016) – this SPD sets out the approach to design and construction.
  - Planning Obligations SPD (January 2017) - the SPD sets out the Council's approach to seeking planning obligations for the provision of biodiversity, education, flood risk, green infrastructure/open space, health, local job/employment opportunities, and transport/travel infrastructure required as a result of new development (amongst other matters).
- 5.47. The majority of the matters raised in the SPDs relate to matters that will be dealt with at detailed design stage or via condition and S106 Agreement.

#### **Other Relevant Policy**

##### **Cheshire and Warrington Local Enterprise Partnership Strategic Economic Plan, Second Edition 2018**

- 5.48. The Strategic Economic Plan was prepared by the Cheshire and Warrington Local Enterprise Partnership. It sets out the overall context and priorities for other detailed plans and strategies for economic growth and is crucial to securing funding from Central Government and in particular Local Growth Funding.

5.49. The LEP's refreshed Strategic Economic Plan confirms the revised growth ambitions for the Cheshire and Warrington sub-region, which is to grow the economy's GVA by £50 billion per annum by 2040 and create 120,000 jobs (net additional). The SEP sets out the key opportunities that will drive the growth ambitions which include the Cheshire Science Corridor, Constellation Partnership, the Mersey Dee Economic Axis and Warrington New City. The SEP also identifies logistics and distribution as one of the key sectors within the sub-region accounting for 18% of GVA and 5% of employment.

**Warrington Council's Economic Development Needs Assessment Refresh Report, August 2021.**

5.50. The purpose of the Refresh to the Economic Development Needs Assessment (EDNA) was to provide a robust evidence base to inform the emerging Local Plan in respect to identifying the future quantity of land required for economic development uses and to analyse the alternative site opportunities to meet that need.

5.51. The EDNA confirms that the growth in e-commerce has boosted an already strong logistics market and that the North West reflects this high demand but that it has significant supply problems. It confirms that the employment land supply within Warrington has reduced from 104.53 ha in 2019 to 38.87 ha in nine sites in March 2021 and of that 38.87 ha of supply, 26.17 ha (8 sites) form local supply and hence only one site (12.7 ha) is strategic supply.

5.52. The EDNA establishes an Objectively Assessment Need of 316.26 ha based upon past take up rates which equates to an additional requirement of 277.39 ha (in addition to the existing supply of 38.87 ha).

5.53. The EDNA confirms in paragraph 4.7 that “nearly two thirds of the Local Supply and all the remaining Strategic Supply are likely to have been developed within five years.....Omega Phases 1 and 2 Remainder (Mountpark Phase 2) has commenced and this last parcel of employment land in Omega South could be completed within a year”.

**Table 9 – Use Class Assessment (Realistic Supply)**

Location	Use Class					Total, ha
	E(g)(i)	E(g)(iii)/B2	B8	E(g), B2, B8	Strategic B2/B8	
Appleton	-	-	1.79	4.69	-	6.48
Birchwood	-	1.87	-	8.71	-	10.58
Lingley Mere	1.15	-	3.62	-	-	4.77
Warrington Central/ Town Centre	-	-	-	-	-	-
Westbrook	-	-	-	4.34	-	4.34
<b>Local, Sub-Total</b>	<b>1.15</b>	<b>1.87</b>	<b>5.41</b>	<b>17.74</b>	<b>-</b>	<b>26.17</b>
<i>Strategic (Omega)</i>	-	-	-	-	12.70	12.70
<b>Total, ha</b>	<b>1.15</b>	<b>1.87</b>	<b>5.41</b>	<b>17.74</b>	<b>12.70</b>	<b>38.87</b>

Source: BE Group, 2021

5.54. The EDNA confirms in paragraph 5.9 that from their detailed, evidence based assessment of all potential sites that could form allocations within the draft Local Plan, only the application Site receives an A+ grading meaning it has limited constraints and could be developed immediately to meet strategic needs.

- Only one site receives an initial A+ grade meaning it has limited constraints and could be made available almost immediately, subject to planning, to meet primarily/exclusively strategic needs. This is the **92.0 ha (gross)** Land at Bradley Hall Farm, Cliff Road (Six56) scheme, where development planning for a strategic B2/B8 scheme is at an advanced stage

5.55. The ranking of sites within the EDNA is set out below:-

**Table 16 – Site Submissions Appraisal by Category (Based on Current Grading)**

Category	Number of Sites	Land Supply, ha	Comments
A+ Unconstrained/Limited Constraints – Strategic Development Options	1	92.00	Land at Bradley Hall Farm, Cliff Road (Six56) – based on this modelling the strongest strategic option being put forward.
A+/B+ Unconstrained/Limited Constraints – Strategic and Local Development Options	6	44.92	Land around Barleycastle Lane, Barleycastle which could be developed for a mixture of local and strategic schemes, with limited constraints evident. Includes one smaller parcel, more suited to local uses, graded B+.
A- Constrained – Strategic Development Options	1	70.00	Six56 Phase II – Further strategic growth option in SE Warrington, but subject to further planning on deliverability, access, etc.
A-/B- Constrained – Strategic and Local Development Options	9	244.68	Including Fiddlers Ferry (101 ha), Port Warrington (60 ha) and seven sites in Rixton. Options for further growth subject to a range of constraints being addressed.
B- Constrained –Local Development Options	2	44.50	Constrained, local only development Options.
C Local Scale Mixed Use Sites/Proposed to Meet Specific Business Needs	8	137.72	By settlement: <ul style="list-style-type: none"> <li>• Burtonwood – 1 site (3.9 ha)</li> <li>• Lymm – 3 sites (124.13 ha)</li> <li>• Stretton – 2 sites (7.29 ha)</li> <li>• Winwick – 2 sites (2.40 ha).</li> </ul> Most are mixed-use proposals, so the impact of the other uses will need to be reviewed separately.
C-D Local Scale Mixed Use Sites (but with greater deliverability questions)	3	33.87	-
D Limited suitability for B-Class Uses	21	102.67	Based on market fit/deliverability, sites are poorly suited for employment development. This does not preclude the possibility that they are suited for other uses.
E Unlikely to be deliverable development site	2	5.94	Assumed undeliverable for most uses.
<b>TOTAL</b>	<b>53</b>	<b>776.30</b>	

Source: BE Group, 2021

5.56. The EDNA therefore endorses the application Site as the most suitable employment opportunity to meet strategic needs within Warrington.

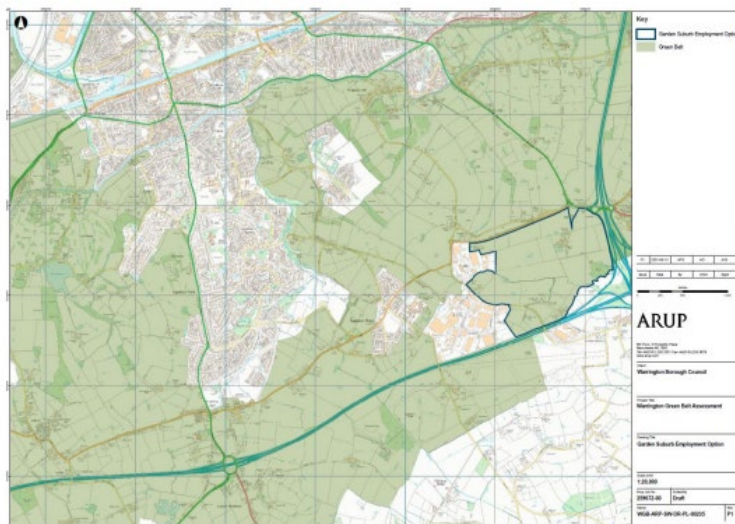
5.57. The EDNA also assesses Warrington’s wider economic geography and concludes in paragraph 6.130 that “against the scale of potential needs from the growing Port of Liverpool, the programmed strategic supply in the Liverpool City Region remains modest, creating ongoing opportunities for sites in Warrington”. It also confirms that “sites in neighbouring authority areas, even when of a strategic scale, will ultimately meet the OAN of those authorities rather

than Warrington. The only exception to this is the proposed Omega South Western Extension, noted above, which is to meet cross boundary requirements”.

**Warrington Borough Council Green Belt Assessment Site Selection – Implications of Green Belt Release (August 2021) and Green Belt Assessment – Garden Suburbs Options (April 2021).**

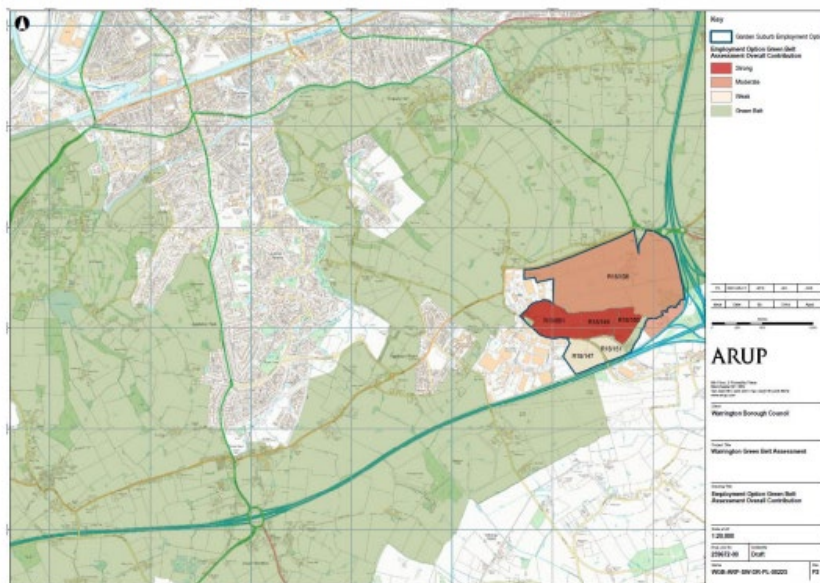
5.58. The Proposed Submission Version Local Plan (2021) was supported by updated Green Belt assessments. Of relevance to the Application proposals are the “Green Belt Assessment – Garden Suburb Options” (April 2021) and the “Green Belt Site Selection – Implications of Green Belt Release” (August 2021) documents. Both documents specifically assess the Green Belt implications of the Application site in the context of the wider proposed employment allocation.

Figure 5. Garden Suburb Employment Option

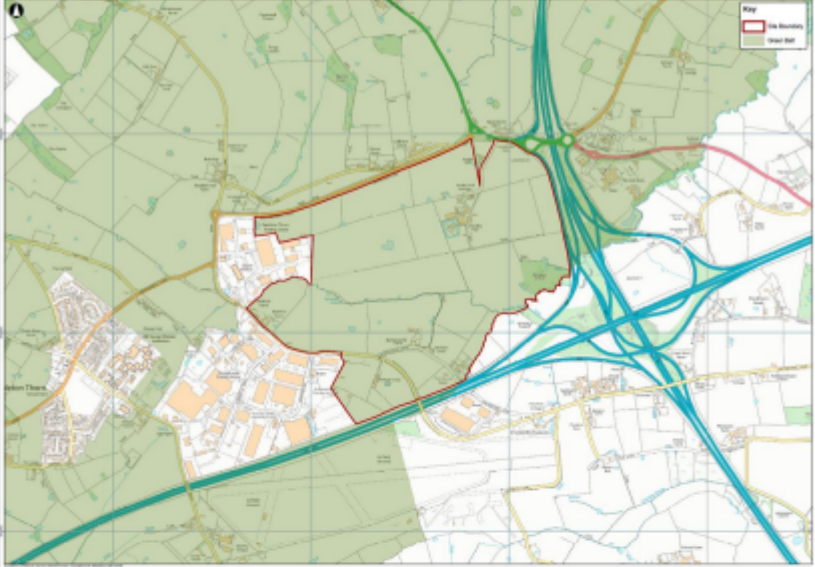


5.59. The “Green Belt Assessment – Garden Suburbs Option” (April 2021) assesses the draft allocation land parcels in terms of their “overall contribution” to the Green Belt. The plan below confirms that the Application site (referred to as R18/106) has a “moderate” overall contribution to the Green Belt which is a lesser impact than the Eddie Stobart / Liberty site (which was the subject of a Secretary of State decision in November 2020) and which has a “strong” overall contribution to the Green Belt.

Figure 10. Sites within the Employment Option



5.60. The “Green Belt Site Selection – Implications of Green Belt Release” (August 2021) document considers the implications on the Green Belt of releasing the draft employment allocation from the Green Belt. This is set out in tabular form in the table over the page:-

South East Warrington Employment Allocation	
	
<p><b>Context:</b> The Green Belt Assessment Garden Suburb Options Report (April 2021) considered this allocation alongside an extended version of the site and assessed the existing contribution to Green Belt purposes. The cumulative impact of releasing this site alongside the housing allocation options was also considered. The boundary shown above remains unchanged from the Options Report.</p>	
Key Question to Consider	Assessment
<p>What is the site's existing contribution to Green Belt purposes?</p>	<p>The proposed allocation encompasses a number of submitted sites which were all assessed for their individual contribution to Green Belt purposes. As set out in the Green Belt Assessment Garden Suburb Options Report (April 2021), the allocation includes the following sites: R18/061, R18/106, R18/147, R18/148, R18/150 and R18/151. These sites made a strong, moderate and weak contribution to Green Belt purposes.</p> <p>As it is proposed to release the entire area as an urban extension, the allocation boundary shown above has been used to undertake this assessment rather than the individual submitted sites.</p>
<p>What is the impact on Green Belt function and purposes of removing the site from the Green Belt?</p>	<p>Purpose 1 – Whilst entailing growth of the Warrington urban area, development would not represent unrestricted sprawl. Development would form an extension to the Appleton Thorn Trading Estate which is inset within the Green Belt. As an urban extension it would be reasonably contained and well</p>



	<p>defined along strong permanent boundaries to the north, east and south (the M6, M56 and the B5356).</p> <p>Purpose 2 – Development of the site would have no impact on preventing neighbouring towns from merging.</p> <p>Purpose 3 – Development of the site would entail an incursion into undeveloped countryside.</p> <p>Purpose 4 – Warrington is a historic town however the site is not near to the Warrington Town Centre Conservation Areas nor does it cross an important viewpoint of the Parish Church.</p>
Are there any cumulative impacts (due to release of adjacent sites)?	<p>There are four allocations in total proposed for release around the Warrington urban area (South East Warrington Urban Extension, South East Warrington Employment Allocation, Fiddlers Ferry Site Allocation and Thelwall Heys Allocation).</p> <p>The South East Warrington Urban Extension and the Thelwall Heys Allocation are both also located to the south east of Warrington. Both of these allocations would be reasonably contained by strong permanent boundaries. Collectively, the release of these sites alongside this allocation would have a similar impact as set out above however it would represent a larger incursion into undeveloped countryside in this location. The remaining surrounding Green Belt could continue to perform its Green Belt function. Development would not harm the overall function and integrity of the Warrington Green Belt.</p>
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	<p>The new Green Belt boundary would be defined by the M6 to the east, the M56 to the south and the B5356 to the north which all represent recognisable and permanent boundaries.</p>
Conclusion	<p>The sites which comprise this allocation made a weak, moderate and strong contribution to Green Belt purposes. Development of this allocation would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it would be reasonably contained and well defined along strong permanent boundaries to the north, east and south (the M6, M56 and the B5356). The remaining surrounding Green Belt could continue to perform its Green Belt function. The removal of this site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the north, east and south by the B5356, M6, and M56 respectively.</p>

5.61. The Assessment concludes that the release of the wider employment site would result in some encroachment into the countryside but that it would not represent unrestricted sprawl; would have no impact on preventing neighbouring towns from merging; and have no impact on historic towns. It is concluded that the site is reasonably well contained and that removal

of the draft allocation area “*will not harm the overall function and integrity of the Warrington Green Belt*”.

- 5.62. These conclusions are considered within section 6 of this Replacement Planning Statement but it worth noting that the above conclusions relate to the whole draft allocation of which the Application Site forms part; and that the Application site has a “moderate” impact on the Green Belt as opposed to other parcels that have a “strong” overall contribution to the Green Belt.

#### **Warrington Means Business 2020**

- 5.63. Warrington Means Business is the Council’s economic growth and regeneration programme. It has been updated and is dated 2020. It confirms the need for new employment land and confirms on page 9 that “Omega, Gemini, Woolston and Birchwood are major successes as employment areas – however these sites are almost full and there is a realisation that Warrington will run out of suitable new sites for business development”. It assesses the opportunities to achieve this and includes on page 23, Six56 (the Proposed Development) as one of its “Priorities – Connected Business locations”. It confirms that “this new business area will be one of the best located new logistics and business destinations in the UK straddling two key motorways and centrally located mid-way between the Liverpool and Manchester conurbations. Subject to the Local Plan’s progress and the planning process, this extended site will come on stream in 2020”.

#### **Warrington Statement of Common Ground (Sept 2021)**

- 5.64. The NPPF (2021) requires Statements of Common Ground to be prepared as part of the Local Plan process. The Warrington Statement of Common Ground (Sept 2021) addresses cross boundary working. It confirms the scale of employment need within the Submission Draft Warrington Local Plan and also the Land at M56 Junction 9 employment allocation (including the Application Site). It confirms in respect of Green Belt (paragraphs 4.15 – 4.17) that Warrington shares its Green Belt boundaries with Cheshire East, Cheshire West and Chester, Halton, Salford, St Helens, Trafford and Wigan Councils. All adjacent Authorities were consulted in respect of the Warrington Green Belt review and raised no objections other than Halton.

- 5.65. The Liverpool City Region Statement of Common Ground (October 2019) covers the Authorities of Halton, Knowsley, Liverpool, Sefton, St Helens, West Lancashire, Wirral as well as the Liverpool City Region (LCR) Metro Mayor and LCR Combined Authority. A new LCR Spatial Development Strategy is being prepared. The Draft Statement of Common Ground confirms in paragraph 4.8 that “the key identified employment land issue for the LCR is the need for strategic B8 sites. The LCR SHELMA indicated that the city region authorities need to identify sites with a combined capacity of at least 397 hectares to be developed for large scale B8 (storage and distribution) before 2037”. It also confirms in paragraph 4.10 that “Knowsley, Sefton and West Lancashire Councils have undertaken reviews of Green Belt boundaries which have formed key evidence for adopted Local Plan documents. St Helens and Halton Councils have undertaken draft Green Belt reviews to inform their emerging Local Plans and Wirral Council consulted on the findings of an initial review of Green Belt in autumn 2018. It will be necessary for the LCR local authorities to continue to consider this matter by responding to development needs and pressures as considered appropriate locally”.
- 5.66. It is evident from both Statements of Common Ground that all authorities within Liverpool City Region and Warrington have recognised the importance of delivering new employment land especially for B8 logistics uses and that each one has had to review their Green Belt boundaries to meet the identified needs.

## 6. Planning Assessment and Justification

- 6.1. We have structured this section of the Replacement Planning Statement to firstly address compliance of the Proposed Development with Green Belt guidance as set out within the National Planning Policy Framework (NPPF 21). This will include consideration of:-
- Whether or not the Proposed Development would represent “inappropriate” development within the Green Belt;
  - The effect of the Proposed Development upon the “openness” of the Green Belt;
  - The effect of the Proposed Development on the “purposes” of including land within the Green Belt;
  - Whether there is any other (non-Green Belt) harm resulting from the Proposed Development;
  - Whether there are any “other considerations” that outweigh the Green Belt and non-Green Belt harm; and hence
  - Whether “very special circumstances” exist in relation to the Proposed Development.
- 6.2. We will then go on to assess the Proposed Development in respect of policy guidance on the Historic Environment (heritage) and hence its overall compliance with National Policy.
- 6.3. Having drawn conclusions in respect of the above, we then go on to assess the compliance of the Proposed Development with the Development Plan. The Development Plan for the Application comprises of the Warrington Local Plan Core Strategy (July 2014) and the Appleton Thorn Neighbourhood Plan (2017). In line with the High Court Judgement *Tivot Way Investments Ltd v Secretary of State for Communities and Local Government, Stockton-on-Tees Borough Council* (CO/774/2015 EWHC 2489 (Admin)) dated 21st July 2015, we consider whether conflict with any individual policy in the Development Plan means that the Application Proposals are or are not in accordance with the Development Plan “as a whole”.
- 6.4. Having reached conclusions in respect of national policy compliance and Development Plan policy compliance, we then consider whether there are any other material considerations that

weigh against the Proposed Development or rather in this case whether these other material considerations actually weigh in favour and hence add support to the Proposed Development.

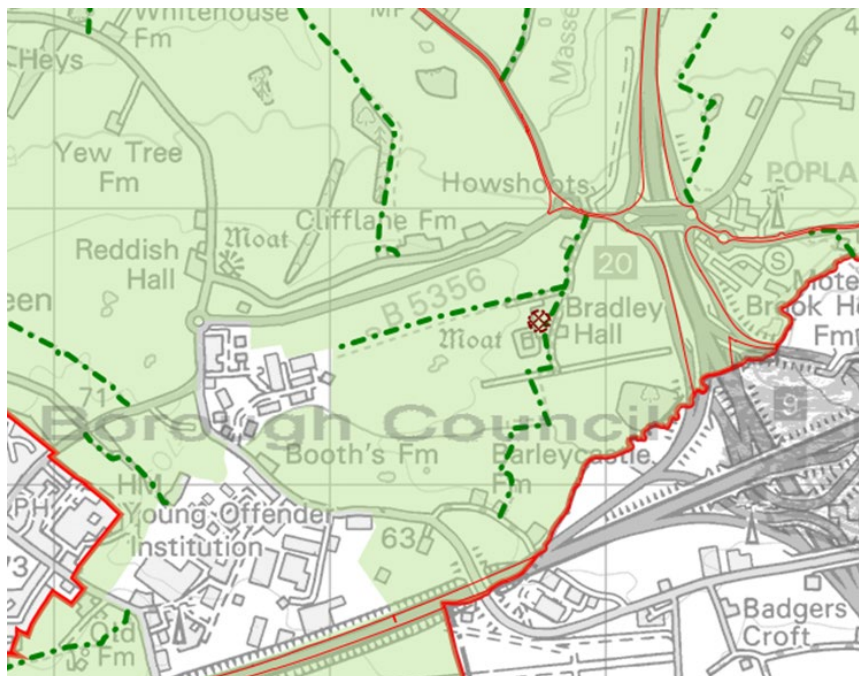
- 6.5. Finally we set out our conclusions in the event that the Local Planning Authority do not support our principle conclusion that we comply with the Development Plan as a whole. In this regard we consider the weight to be applied to any non-compliance with policies and whether there are other material considerations that would outweigh this non-compliance.

## **A) Compliance with National Planning Policy Framework (NPPF 19)**

### **I) National Policy on the Green Belt**

#### **Whether or not the proposed development would represent inappropriate development within the Green Belt**

- 6.6. As noted in Section 5 of the Replacement Planning Statement, the Development Plan relevant to the Proposed Development comprises of the adopted Warrington Local Plan Core Strategy (July 2014) and the Appleton Thorn Neighbourhood Plan. A High Court Challenge to the adoption of parts of the Warrington Local Plan Core Strategy (February 2015) resulted in removal of elements of the housing policies from the Local Plan but all other policies within the plan remain unaltered.
- 6.7. The Application Site is shown as Green Belt within the adopted Core Strategy (2014) Proposals Map which is illustrated by the green wash on the plan below. It is therefore accepted that the Application Site lies within the Green Belt.



6.8. The National Planning Policy Framework (NPPF 21) Paragraph 137 indicates that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The NPPF (21) goes on to state that inappropriate development within the Green Belt, is by definition harmful and should not be approved except in very special circumstances. Except for a small number of exceptions set out in the NPPF paragraphs 149 and 150, development within the Green Belt should be regarded as inappropriate development. The Proposed Development does not fit within any of the exceptions listed and the Applicant accepts that it would represent inappropriate development in the Green Belt.

6.9. In line with paragraph 147 of the NPPF (21), it is acknowledged that the Application Proposals are “by definition, harmful to the Green Belt”, and that they should not be approved “except in very special circumstances”. Paragraph 148 of NPPF (21) states that “substantial weight is given to any harm to the Green Belt”. We accept therefore that there is “definitional harm” to the Green Belt, and we now consider the Proposed Development against the Policy considerations of “openness” and the five “purposes” of including land within the Green Belt as set out by NPPF (21) paragraph 138.

### **The effect of the Proposal on the openness of the Green Belt**

6.10. The NPPF (21) does not specify a precise definition of “openness”. However, the Planning Practice Guidance has clarified the factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. Paragraph 001 Reference ID: 64-001-20190722 of the PPG states:

*“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”*

- 6.11. In light of the above guidance and a number of legal judgements, we will evaluate the impact of the Application proposals on the “openness” of the Green Belt as follows:-
- factors relevant to how built up the Green Belt is now;
  - how built up it would be if redevelopment occurs; and
  - factors relevant to the visual impact on the aspect of “openness” which the Green Belt presents.
- 6.12. The Application Site itself is predominantly rural in character and consists of a number of medium-sized agricultural fields. The site also contains Bradley Hall farm which consists of farm house and a series of outbuildings. Therefore, the Site is largely devoid of development. Nevertheless, the presence of the neighbouring industrial parks to the west (located outside the Green Belt) has a strong visual influence on the character of the Site. In addition, the M56 and M6 motorways are strongly defining man made features in this area, which also fragment the rural character of the area.
- 6.13. The Application Proposals would introduce large footplate buildings into the Site and the wider Green Belt locality along with associated infrastructure, external yards, and car and lorry parking. These elements can be controlled by the Parameters Plans that form an integral part of the application. It is accepted however that the introduction of these built elements will have an adverse impact upon the openness of the Green Belt in this location.
- 6.14. The Environmental Statement and its Second Addendum that accompanies the Application includes an assessment of the visual impact of the Proposed Development. This assessment is based on the LVIA study area of 2.0 km measured from the centre of the Site. Consistent with the LVIA, any impacts on openness are assessed based on the envelope set by the LVIA ZTV study area. Of relevance to the issue of openness, is the topography and nature of long distance views and how they would affect the Green Belt openness rather than whether there is a visual impact upon adjoining dwellings. To the north, the land slopes gently towards Grappenhall and consists of largely attractive rural countryside, which from certain locations offers longer distance views towards the north and east. Views and landscape to the south are similarly rural in nature but are largely screened from extending beyond the M56 motorway. Views east are also generally contained by vegetation associated with the M6 motorway and the woodland blocks within the Site. Views from south of the M56 are generally



not available due to the density of hedgerow vegetation, woodland blocks and copses, as well as mature vegetation along the M56. Areas west and east of the Site are more visually contained by the industrial parks to the west and dense vegetation around the M6 and the slip roads associated with it and the M56. On this basis we consider that whilst the existing site features would limit the impact of new buildings and structures in terms of visual impact on the locality, they also serve to “contain” the development in terms of the impact on openness of the Green Belt.

- 6.15. The Warrington “Green Belt Site Selection – Implications of Green Belt Release” (August 2021) document which supports the Draft Submission Local Plan confirms this “containment” wherein it notes that the wider draft allocation “would be reasonably contained and well defined along strong permanent boundaries to the north, east and south..” The Application Site forms part of this wider draft allocation which includes land identified as having a “strong”, “moderate” and weak” contribution to the Green Belt. The Application site is identified as have a “moderate” contribution within this context and hence it is reasonable to conclude that the containment referred to in the document is applicable to the Application Site.
- 6.16. Notwithstanding the existing urbanising influences within close proximity to the Application Site and the degree of “containment” of the Site by existing landscape features which punctuate the Green Belt, we recognise that the Site forms part of a wider parcel of the Green Belt and therefore accept that the scale of the new buildings and structures will have an impact upon the Green Belt openness due to their scale and height. We equate the nature of this impact to be “major harm”.

#### **Green Belt Context**

- 6.17. The Local Plan Green Belt Assessment Final Report (October 2016) was produced to inform the Local Plan Review. The assessment was made in the context of the significant employment and housing land need identified earlier in the Report. It identified that the Warrington Green Belt is contiguous with the Green Belt in Merseyside, Greater Manchester and North Cheshire. It also identifies that Lymm and Culcheth are the largest of the outlying settlements that are surrounded by the Green Belt.
- 6.18. The Report identifies that the Warrington New Town Outline Plan was approved in 1973, which set out the extent of the area covered by the New Town Designation, including the existing town and the land to be developed as part of the four new districts. The Plan set out

the strategy to expand the town's population from 120,000 to 200,000 by the year 2000 and planning policies of restraint were applied to the villages and rural areas of the borough to support this. The Warrington and Runcorn Development Corporation was wound up in 1989 and the full level of development envisaged in south Warrington was not fully realised.

- 6.19. The Green Belt around Warrington was first formally introduced in the Cheshire Structure Plan 1977 (adopted 1979). The Structure Plan set out the areas outside of the New Town Designation as being within the Green Belt. As a result, the current Green Belt boundaries are still based upon the designation established in 1979.
- 6.20. The Council's Green Belt Assessment carried out an assessment of the Borough's Green Belt to understand how it performs against the role and function of the Green Belt as set out in national policy. The assessment divided the entire Green Belt within the borough into a number of large parcels of land, defined as General Areas. These General Areas are then subdivided into a number of small parcels of land, which are then individually assessed against the five purposes of the Green Belt set out in paragraph 138 of the NPPF. The Application Site is located within General Area (GA) 10.
- 6.21. The Stage I Assessment confirmed that GA10 made a weak contribution to purpose 1 of the Green Belt purposes, recognising that there could be potential for rounding off of the settlement pattern if this land was released from the Green Belt. It also recognised that the parcel is within a wide gap between the Warrington urban area and Lymm which is already separated by the M6 and therefore does not make any significant contribution to preventing towns from merging (purpose 2). It also acknowledges that the M56 and M6 provided more durable boundaries which would prevent encroachment beyond the GA if this land was to be released from the Green Belt (purpose 3). It went onto say that the GA makes a weak contribution to purpose 4, given there is a large separation between Warrington Parish Church and the GA and it provides a moderate contribution to purpose 5 due to the small percentage of brownfield land which assists in urban regeneration.
- 6.22. In line with the Stage I Green Belt assessment, the Submission Draft Local Plan proposed that that the Site should come forward as an employment allocation and that it should be released from the Green Belt and a new long term defensive Green Belt boundary be created in this location.

- 6.23. This 2017 Green Belt Assessment has been updated as set out in Section 5 of this Replacement Planning Statement. The updated Green Belt Assessment (Green Belt Site Selection – Implications of Green belt Release” (August 2021) concludes that the release of the wider employment site would result in some encroachment into the countryside but that it would not represent unrestricted sprawl; would have no impact on preventing neighbouring towns from merging; and have no impact on historic towns. It is concluded that the draft allocation site is reasonably well contained and that removal of the draft allocation area “*will not harm the overall function and integrity of the Warrington Green Belt*”.
- 6.24. It is clear that the emerging Local Plan envisages that the Site can be removed from the Green Belt and that the purposes of Green Belt policy in this locality would be maintained by land outside of this Application Site.
- 6.25. Notwithstanding the Council’s commitment to release this Site from the Green Belt in their emerging Local Plan evidenced and justified through the preparation of the Plan, it is yet to be adopted therefore we have undertaken our own assessment of the Application Site against national Green Belt policy as set out below. Later in this Replacement Planning Statement we outline our case that Very Special Circumstances exist to justify the Proposed Development within the Green Belt.

### **The effect of the Proposal on the purposes of the Green Belt**

- 6.26. We now consider the Proposed Development against the five purposes of including land in Green Belt.

#### **Check the unrestricted sprawl of large built-up areas**

- 6.27. The Application Site is not immediately adjacent to the Warrington urban area, and the development of the Site will introduce new development of a significant scale that will extend the built form of the Trading Estate eastwards. Nevertheless, the Proposed Development would not represent the outward expansion of the Warrington urban area and a significant area of Green Belt would remain undeveloped between the Site and Warrington. Therefore the Proposed Development is not in conflict with this purpose. The updated Green Belt Assessment (Green Belt Site Selection – Implications of Green Belt Release” (August 2021) confirms our conclusion, noting that “whilst entailing growth of the Warrington urban area, development would not represent unrestricted sprawl”.

**Prevent neighbouring towns from merging into one another**

- 6.28. This Site is identified as forming a less essential gap between the Warrington urban area and Lymm, which is a settlement to the north east, separated by the M6 motorway. The boundaries of the Application Site are a significant distance from Lymm. The development of this Site would not result in the towns merging and would not narrow the gap between these settlements. The Proposed Development would not have any impact upon the Green Belt “purpose” of preventing neighbouring towns merging into one another. The Proposals are not in conflict with this purpose. The updated Green Belt Assessment (Green Belt Site Selection – Implications of Green Belt Release” (August 2021) confirms our conclusion, noting that “development of this site would have no impact on preventing neighbouring towns from merging”.

**Assist in safeguarding the countryside from encroachment**

- 6.29. We accept that the Application Proposal will lead to encroachment into the countryside. However as previously identified, the Application Site already has significant urbanised influences by virtue of the adjacent trading estate and motorways. Equally, the land is also enclosed by durable boundaries to the north with Cliff Road, to the east by the M6 and visually to the south by the M56. These features help to mitigate the extent of the encroachment.
- 6.30. We consider that development of the Application Site will help to meet identified development needs and hence preclude the need to bring forward other sites that may result in encroachment into more sensitive areas of countryside elsewhere within the borough. The Proposal does however conflict with this purpose. The updated Green Belt Assessment (Green Belt Site Selection – Implications of Green Belt Release” (August 2021) confirms that “development of this site would entail an incursion into undeveloped countryside” but it notes that the “remaining surrounding Green Belt could continue to perform its Green Belt function. Development would not harm the overall function and integrity of the Warrington Green Belt”. We concur with this conclusion.

**Preserve the setting and special character of historic towns**

- 6.31. The Application Site is not adjacent to the historic town of Warrington and does not cross any important view point of the Warrington Parish Church and hence has no effect upon the setting and special character of historic towns. This is also the position the Council took in

the updated Green Belt Assessment (Green Belt Site Selection – Implications of Green Belt Release” (August 2021).

- 6.32. Overall this parcel makes a negligible contribution to purpose 4 of the Green Belt, which is to preserve the setting and special character of historic towns. Therefore, it is considered that the proposals do not conflict with this purpose.

**Assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

- 6.33. The Council’s 2017 Green Belt Assessment highlights that there is no single correct method for assessing purpose 5 and some other Local Authority assessments choose to screen this purpose from their assessments. Warrington’s Green Belt Assessment has adopted a pragmatic approach to this issue, given this provides a high-level view of the role of the Green Belt in encouraging the recycling of derelict and other urban land. The Assessment takes a uniform approach to the assessment of this purpose and confirms all parcels assessed make a moderate contribution to this purpose, based on the brownfield urban capacity across the whole Borough as defined in their SHMA.

- 6.34. Nevertheless, it is evident that there is insufficient previously developed land to accommodate the future needs of the Borough. As such, there are no sites within the older parts of Warrington that could accommodate the Proposed Development and neither would it be desirable from an infrastructure and environmental standpoint for the Proposed Development to be located within these areas. The Alternative Site Assessment submitted with this outline planning application also confirms the lack of alternative sites to accommodate the Proposed Development outside of the Green Belt. Therefore, the Proposed Development will not harm any urban regeneration initiatives and importantly will not prejudice the use of derelict and other urban land. Furthermore, as identified earlier in this Replacement Planning Statement, the provision of logistics development acts as a significant enabler for encouraging and stimulating growth within the other parts of the economy in the Borough. Therefore, in our view, the Proposed Development will have a neutral impact on this purpose and hence are not in conflict with it.

**Summary**

- 6.35. In respect of potential Green Belt harm, the above assessment shows that in line with paragraph 147 of NPPF (21), the application proposals are “by definition, harmful to the Green

Belt” and as set out in paragraph 148 of ‘NPPF (21)’ “substantial weight is given to any harm to the Green Belt”.

- 6.36. There is also “major” harm to the “openness” of the Green Belt from the Proposed Development.
- 6.37. We consider that in terms of the “purposes” of including land within the Green Belt, the application Proposals demonstrate only “limited” harm to the Green Belt Purposes overall.

### **Whether there is “any other harm” resulting from the Proposed Development**

- 6.38. We now consider whether there is “any other harm” which we take to be non-Green Belt harm. We therefore now consider whether there is any potential environmental or technical (non-Green Belt) harm that could arise from the Proposed Development.

#### Ground

- 6.39. A Preliminary Geo-Environmental Assessment and ES Technical Paper 1 sets out the details of the ground conditions on the Site.
- 6.40. The reports identified that only very limited negative impacts have been identified, and, even if these do manifest then they are likely to be minor and only short-term effects. The natural soils and rock immediately underlying the Site do not provide a strategic water resource and are therefore are much less sensitive to contamination from the surface. The Bradley Brook adjacent to the southern boundary of the Site is a sensitive environmental receptor, however risks are likely to be restricted to silt run-off during construction as no contamination has been identified on the Site. There are risks associated with dust generation, particularly during construction. However, as the soils are not identified as contaminated then simple dust control measures (such as damping / wetting of soils) should be enough to mitigate any residual risk.
- 6.41. Any soils re-used on Site or imported onto the Site during construction will have to be tested to demonstrate that they are not contaminated and do not represent a risk to future Site users and the wider environment. Soils used in landscaping will be tested to demonstrate that they minimise any zootoxic or phytotoxic effects.

6.42. It is therefore considered that based on the above, **NEUTRAL** weight should be ascribed to this matter in the planning balance.

Landscape Character and Visual Amenity

6.43. Whilst, we have considered the impact of the proposals against Green Belt purposes and on openness, it also important to consider landscape and visual amenity matters in this application. The ES Technical Paper 4 and its Second Addendum comprises of a Landscape Visual Impact Assessment (LVIA).

6.44. The Landscape and Visual Impact Assessment (LVIA) updated to address comments raised by consultees, which has resulted in a reduction in the more prominent building heights from 43.5m to 30m (to ridge) focuses on assessing the potential effects of the development in two key areas:

- Assessing the potential effects of development upon the physical nature and features of the receiving landscape as well as landscape character and quality; and
- Assessing the potential visual effects of developments upon the visual amenity of people (referred to as visual receptors) in terms of the properties and locations to which the public has access. In the case of private properties (e.g. residential) the assessment is made judged from the best publicly available location.
- Further supplementary information has been included as part of the LVIA First and Second Addendums, including an assessment of potential effects on the visual amenity of properties in the vicinity, in order to provide greater transparency to the LVIA and its findings, intended to aid WBC in its determination of the application.

6.45. The Warrington Landscape Character Assessment identifies the Site as being located within the Undulating Enclosed Farmland and more specifically Sub Type 1B Appleton Thorn. This character type is considered to contain a broad expansive agricultural landscape lacking hedgerows with a strong visual and audible presence made by the M56, with existing commercial developments imposing upon the skyline of the ridgeline at Appleton Thorn. The assessment considers that substantial changes have occurred within the area including: a substantial reduction of hedgerows and hedgerow trees within the area; decline in the management of the remaining hedgerow and hedgerow tree species; and the encroachment of housing and other developments imposing onto the skyline of the character area.

- 6.46. The Site is currently contained within Green Belt land although the Councils Submission Draft Local Plan has identified the Site as a potential employment allocation within the Garden Suburb. A Scheduled Monument (SM) is present in the form of a moat surrounding the farm building and the Appleton FP23 and Appleton FP28 public footpaths move through the Site.
- 6.47. The LVIA assesses the character area as being of Medium sensitivity to change and recognises that a development of the nature proposed will result in a major change to the landscape of the Site, and its immediate vicinity as well as the wider landscape type and to the adjacent character types to the north of the Site, which are inter-visible. Landscape effects with mitigation have been assessed as being Moderate/Major, adverse, direct and significant due to the degree of change that will occur with the Proposed Development.
- 6.48. Visual effects have determined where some or all of the Proposed Development is likely to be visible through a combination of desktop, digital modelling and field surveying. A Zone of Theoretical Visibility (ZTV) has been identified and to assist the assessment a series of photographs have been taken from viewpoints, which have been agreed with the Warrington Borough Council. For a selection of viewpoints, wireframe images of the Proposed Development have been superimposed to show the proposals as accurately as possible. It has been assessed that visual receptors within the Site or closest to the perimeter, particularly the residential receptors to the north and south of the Site will experience the greatest effect by the Proposed Development. Further away from the Site's boundary significant effects are experienced by views predominantly from the north. Views to the south are limited due to the distance from the Site and the dense overlapping vegetation screening the Proposed Development. Steps to reduce the visual impact of the more prominent buildings on the site have been taken following consultation with the Council, resulting in a reduction of the 43.5m high building from 43.5m to 30m and other buildings from 24.5m to 22m, which is now reflected in an updated Heights Parameter Plan which can be approved with the outline planning permission to control building heights.
- 6.49. There are a number of residential receptors that will experience significant adverse effects. These include: Bradley View, which is encompassed by the Proposed Development; the properties located along Cartridge Lane to the north of the Site; and the properties along Barleycastle Lane to the south of the Site. Road users of the B5356 Grappenhall Lane and Cartridge Lane, to the north of the Site, will be affected along with users of Cliff Lane. Other roads to the north travelling southbound towards the Site will have varying visibility of the



Proposed Development. Views to the south of the Site are limited especially to the west of the M6 and south of the M56 motorways due to the presence of mature tree vegetation within and surrounding Bradley Gorse. Views from Public Rights of Way's (PROW), especially users of Appleton FP23, Appleton FP28, Grappenhall & Thelwall FP05 and Grappenhall & Thelwall FP17 will experience significant adverse effects to the view due to the Proposed Development. The Proposed Development will affect views from other PROW's within the area, but these have generally been assessed as not significant, particularly where dense overlapping field vegetation screens either fully or the majority of the Proposed Development.

- 6.50. Mitigation for adverse landscape and visual effects has been incorporated into the Proposed Development. Where feasible this has included the retention of boundary vegetation. In addition, the building heights have been lowered in order to respect the setting of the Scheduled Monument (SM) and the longer distance views into the Site. Building cladding will also be carefully chosen and muted and non-reflective surfaces will be utilised. The opportunity has also been taken to combine landscape and ecological mitigation through the retention of Bradley Gorse and the incorporation of an ecological mitigation area as well as the establishment of natural woodland mixes and various habitat creation measures to provide additional screening as well as to support species diversity.
- 6.51. The nature and scale of the Proposed Development will result in adverse landscape and visual effects, which cannot be fully mitigated for at the completion of construction and the commencement of operations. The landscape masterplan for the Proposed Development incorporates areas of tree planting around the perimeter of the Proposed Development, which over time, will establish and mature to provide improved screening of the large proposed buildings. The LVIA includes an assessment comparing the effects of the development at year 1 and year 10. Whilst certain effects are not fully reversible, proposed planting will provide some limited reduction to the severity of effects, particularly to the north of the Site where the disturbance is initially likely to be the greatest with further reduction likely for some receptors over a longer time frame as planting continues to mature.
- 6.52. A Residential Visual Amenity Assessment (RVAA) has also been undertaken in response to the request of Warrington Borough Council (WBC). A RVAA is an additional stage beyond what is normally considered within a Landscape and Visual Impact Assessment (LVIA) and focuses exclusively on private views and private visual amenity. An RVAA may be used by the

LPA when determining the appropriate weighting of potential effects on Residential Amenity in consideration of the overall planning balance

- 6.53. The RVAA has assessed that there are a number of properties, which are predicted will experience substantial adverse visual effects as a result of the development. In determining whether the RVA Threshold has been reached, the focus has been on whether the visual intrusion is of such a magnitude as to render the property an unattractive place to live as distinct from whether the development can be seen and results in significant adverse visual effects.
- 6.54. Planning precedent is established through a number of planning inquiry and appeal decisions and with respect to RVAA, the LI Technical Guidance Note 2/19 provides a useful reference point to a number of previous decisions. There is no 'right to a view' but the judgement regarding the RVA Threshold is based on whether the proposal would affect the outlook of the resident to such an extent that it was unpleasant and overwhelming rendering the property an unattractive place to live.
- 6.55. Based on the above criteria the assessment concludes that none of the properties assessed would reach the RVA Threshold.
- 6.56. As a result of the findings of the LVIA, we ascribe **MODERATE/MAJOR HARM** to this element of the application.

#### Heritage

- 6.57. The ES Technical Paper 9 and its Addendum assesses in detail the impact of the Proposed Development on the significance of those heritage assets affected. It determined that there are a number of heritage assets within the 1 km study area, some of which are recorded within the Site including the Scheduled Monument Bradley Hall Moat, the locally listed Bradley Hall and associated barn and the course of a Roman Road, which heads through the northern margins of the Site in an east west direction. Those assets that will experience a direct/ indirect impact on their setting include the Scheduled Moat and associated Bradley Hall and Barn, the Roman Road and the site of a medieval cross.
- 6.58. Technical Paper 9 and its Addendum identifies that the landscape surrounding the Site is characterised by post-medieval and later agricultural fields interspersed with farmsteads. Evident are later intrusions including the M6 and M56 and various trading estates which form

a dominant aspect of the area to the east, west and south of the Site. Set within this conflicting landscape are a number of farms, and a number of which are listed including those on Barleycastle Lane. Whilst these have been in part blighted by modern development they do retain their post-medieval character. Integral to this are the fields within which they sit which form an important part of their setting. The Proposed Development will see some further erosion of the agrarian landscape, but not to the full detriment of the significance of the assets as sufficient landscape character will remain around these assets to gain a sense of their original context. The setting will, however, be in part affected by the Proposed Development but sympathetic design has been incorporated in to the illustrative masterplan and parameters plan to limit the impact on setting including the retention of hedgerows and trees along the northern and southern edge of the Proposed Development and the provision of an extensive buffer set back from these boundaries to further screen the development proposals, which help maintain key viewpoints and preserve the open setting and special character of this heritage asset.

- 6.59. The Technical Paper and its Addendum concludes that with mitigation in place the Proposed Development will only result in one Moderate Adverse Impact. This is as a result of the erosion of the landscape character of the Scheduled Moat and effects on its setting. Whilst this is considered to be a moderate adverse impact, the Proposed Development scheme has been designed to reduce the impact on setting as much as possible. Therefore, having regard to the provisions of the NPPF (paragraph 196) the Cultural Heritage & Archaeology Technical Paper and its Addendum concludes that these effects and the extent of harm to the heritage value of adjacent locally listed and listed building and the Scheduled Ancient Monument is considered to be less than substantial (paragraph 3.11 of the Heritage Statement – Appendix 9.4 of the Cultural Heritage & Archaeology Technical Paper and its Addendum). As a consequence, this harm should however be balanced against the wider public benefits of the scheme.
- 6.60. The mitigation measures that been applied to alleviate this impact are through scheme design including a 30m standoff from the moat; retention of trees and vegetation around its edge; the provision of a green corridor to preserve views to and from the moat; demolition of farm buildings to return the landscape in this locality to its original form and thus improve the historical integrity of the moat; and re-alignment of the PROW to aid heritage interpretation and public engagement for a monument that has largely been closed off to the public. Any

estate road which transverses the green corridor should be built into the levels of the site and not have street lighting to reduce impacts on the setting of the green corridor and SAM.

- 6.61. In addition, a programme of archaeological evaluation and mitigation will be undertaken to further investigate the Roman road and the site of the medieval cross. A number of the anomalies identified by the geophysical survey will also be assessed in line with NPPF (19) and Local Plan Policies. In addition to this, archaeological recording of Bradley Hall and barn prior to any alterations will be undertaken. A number of the farm buildings to be demolished will also be recorded. The resultant impact on the archaeological resource is considered to be negligible.
- 6.62. Comments have also been raised since the submission of the planning application by the Conservation Officer regarding the historical and architectural merit of the existing agricultural buildings that lie to the east of the Scheduled Monument, proposed for demolition. Further information has subsequently been submitted with the Cultural Heritage and Archaeology ES Addendum Paper, which assesses the setting, condition, context and architectural detailing of these buildings and their relationship to the Scheduled Ancient Monument. The Conservation Officer has subsequently confirmed that she does not object to the removal of these buildings and that the buildings should be recorded in accordance with a planning condition on any outline planning permission.
- 6.63. It is concluded that in the context of Para 196 of the NPPF (19) the Proposed Development constitute less than substantial harm in this regard. As the overall conclusion is that the Proposed Development will have a negative impact on their setting, the harm is therefore **MODERATE** in respect to this element.

#### Ecology

- 6.64. The Site has been considered in detail in terms of ecology and biodiversity. This is set out within Technical Paper 5 and its Addendum of the ES. This has included a range of species-specific survey work in addition to an ecological appraisal.
- 6.65. These studies highlight that the Proposed Development will mainly result in losses of arable land, improved pasture buildings and hardstanding of negligible ecological importance. There will be some small-scale loss of ponds of local ecological importance and scrub of Site ecological importance which will be mitigated through the provision of an ecological area of

approximately 10 ha containing rough grassland, scrub and ponds. In response to the GMEU statutory consultee response, further biodiversity enhancements have been made, with are reported in the Addendum to Technical Paper 5. The ecological mitigation area can now accommodate total of seven replacement ponds, based on the principle of 2:1 replacement of GCN breeding ponds, and 1:1 replacement of other ponds to enhance aquatic breeding habitat for Great Crested Newts (GCN).

- 6.66. To raise the provision of new wetland habitat towards a 2:1 replacement of all ponds, a number of the proposed attenuation basins in locations identified on the updated Drainage Parameters Plan can be designed so that they will permanently hold water. Where possible, ponds selected for this treatment will be those closely linked to the proposed Green Infrastructure and Bradley Brook watercourse corridor and will be landscaped to maximise benefits for wildlife. Other attenuation features included across the scheme which are likely to be dry most of the time will be appropriately landscaped to provide a contribution towards additional terrestrial habitat for GCN and other wildlife using the site. A 15m stand off and buffer from Bradley Brook to the south of the site will also form an important wildlife corridor.
- 6.67. It concludes that the ecological area together with the retained habitats will provide suitable mitigation for habitat loss for; bats, most bird species (both breeding and wintering) and Great Crested Newts (GCN). Mitigation for the loss of bat roosts in buildings has also been provided together with measures avoiding killing / injury of bats and GCN. The Technical Paper and its Addendum concludes that *“collectively the measures reduce to negligible the potential negative effects of the proposed development on the above habitats and species.”*
- 6.68. Management and Maintenance of these areas on site will be agreed through a Landscape and Ecological Management Plan, which will provide a commitment to manage these areas over a 20 year period.
- 6.69. Loss of farmland habitat which is suitable for breeding skylark and overwintering birds such as lapwing and starling cannot be mitigated entirely within the scheme boundary. Following discussions with statutory consultees, GMEU the principle of an off-site mitigation strategy has been agreed to ensure that mitigation for such losses will be provided as a financial contribution to an off-site habitat management scheme. The off-site mitigation should be located within the local area (within WBC area). The exact details of the proposal will be agreed with WBC (and their statutory consultee GMEU) and can be secured via a Section 106 agreement. At the time of writing of this Replacement Planning Statement, the Applicant can

confirm that discussions regarding the off-site habitat management scheme have advanced. The Applicants consultants have been in positive discussions with Mersey Gateway Environmental Trust (MGET) who are undertaking a grazing scheme to benefit farmland birds (notably lapwing and skylark) at Upper Moss Side in Warrington, MGET have now identified a cost to be paid via a commuted sum towards the continued funding of this project over a 20 year period which will off-set the impacts on the site as a result of the loss of this farmland habitat, which has been agreed with the Applicant.

- 6.70. Notwithstanding this financial contribution to the off-site habitat management scheme, the Technical Paper and its Addendum confirms that Proposed Development does still result some limited impacts on site which cannot be fully mitigated given there will still be a loss of breeding and wintering habitat for farmland bird species on site which require open ground.
- 6.71. Consistent with the requirements of paragraph 175 of the Framework, which states proposals should seek to secure measurable net gains for biodiversity, GMEU have also stated that the Defra metric should also be used to provide the baseline position and to ultimately demonstrate that there would be no net loss in biodiversity value within the site as a result of Proposed Development. This calculation using the Defra Metric has now been undertaken by Tyler Grange and the results of this Biodiversity Net Gain (BNG) have been submitted to the Council to supplement this Application. In summary, the calculator demonstrates an overall net gain in biodiversity on site for area habitats of 10.49% and for hedgerows (and other linear habitats) of 6.55% which complies with paragraph 175 of the Framework and GMEU's request for 'no net loss' on Site.
- 6.72. In overall conclusion, whilst the proposals will have a negative impact with a loss of open ground used by wintering birds, the harm is therefore **LIMITED** and off-set by the measurable gains associated with the contribution to an off-site habitat management scheme and the fact that areas of the site which are either retained or newly created habits ensure there is no net loss in biodiversity, resulting in positive environmental impact.

#### Residential Amenity

- 6.73. Careful consideration has been given to matters of residential amenity. There is a Noise assessment submitted as part of this application alongside a Technical Paper 7 and its Addendum on Noise and Vibration within the ES. Positive steps have been taken within the ES Addendum to address concerns raised in respect of residential amenity outlined in

consultee responses from the Council's appointed landscape consultants acting as statutory consultees and the Council's Environmental Protection team.

- 6.74. The location and height of bunds have been refined to provide effective mitigation to attenuate noise egress from the site during the operational phase and reduce any perception that these bunds confine these buildings within a barricade by opening up more space around Bradley Hall cottages. The updated Acoustics Parameter Plan now ensures appropriate noise mitigation is in place to attenuate noise levels that will be experienced during the operational phase of the development at existing properties on Cartridge Lane and sensitive receptors within the site comprising Bradley Hall Cottages and Bradley View. The realignment of the proposed roundabout access into the site shown on the updated Access and Circulation Parameters Plan, including the proposed location of bunds illustrated on the updated Acoustics Parameter Plan will reduce noise levels from road traffic and proposed service yards and docking bays to an acceptable level. The removal and realignment of any proposed estate road on the site carrying operational traffic away from Bradley Hall Cottages will also reduce noise levels adjacent to the Cottages to an acceptable noise level. The reconfiguration of landscape bunds will also retain some sense of openness around the Cottages and green corridor.
- 6.75. Additional acoustic barrier screening has also been carefully considered at roadside and bund locations adjacent to Bradley Hall Cottages. The bunds will have maximum 1:3 gradient slopes, facing the cottages with 2.5-3m high acoustic fencing on parts of the bunds separating Bradley Hall cottages and Zone C and D. The side of the bund facing the proposed industrial units will be almost vertical, formed from Gabion walls or similar. The gabion wall will be within 1m of the car park edge and will continue around the perimeter of the car park to accommodate the bund. This noise mitigation detail has now been submitted on the updated Acoustic Parameters Plan to be approved with this Application and the Council's Environmental Protection team have removed their previous objection, subject to the imposition of appropriately worded planning conditions.
- 6.76. A Residential Visual Amenity Assessment (RVAA) has also been undertaken in response to the request of Warrington Borough Council (WBC). The RVAA has assessed that there are a number of properties, which are predicted will experience substantial adverse visual effects as a result of the development. In determining whether the RVA Threshold has been reached, the focus has been on whether the visual intrusion is of such a magnitude as to render the

property an unattractive place to live as distinct from whether the development can be seen and results in significant adverse visual effects. There is no 'right to a view' but the judgement regarding the RVA Threshold is based on whether the proposal would affect the outlook of the resident to such an extent that it was unpleasant and overwhelming rendering the property an unattractive place to live. Based on the above criteria the assessment concludes that none of the properties assessed would reach the RVA Threshold.

6.77. In addition, an updated Technical Light Spill Assessment has been produced which is contained within the ES Addendum Part I Report. The Updated document provides an assessment of the likely residual effects of construction and operational lighting and includes a night time analysis to provide an indication of how operational lighting would appear. Whilst the Application Proposals are only in outline and not yet subject to detailed design, the Light Spill Assessment makes a number of recommended mitigation measures which if incorporated into detailed design stages in accordance with planning conditions will comply with ILP Guidance on the reduction of obtrusive light during both pre-curfew and post-curfew time slots.

6.78. The Noise and Vibration Technical Report and its Addendum now highlights that the Proposed Development is expected to have a Minor adverse impact on all sensitive receptors (including Bradley View and Bradley Hall Cottages). However, the assessments, in respect of both the Noise and Vibration and Lighting indicate that through appropriate mitigation described above and subject to further assessment at detailed design stage, then potential impacts on residential amenity can be sufficiently mitigated to have a negligible impact both during construction and operation. It is considered that through appropriate measures, there will be **LIMITED** harm.

#### Air Quality

6.79. An Air Quality Assessment has been undertaken in respect of the Proposed Development. ES Technical Paper 8 concludes that,



“Pollutant concentrations are predicted to be within the relevant health-based air quality objectives at the façades of existing receptors. Therefore, air quality is acceptable at the development site, making it suitable for its proposed uses. The operational impact of the Proposed Development on existing receptors is predicted to be “negligible” taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for this assessment together with professional judgement, the operational air quality effects are considered to be ‘not significant’ overall.

The Six 56 Warrington development does not, in air quality terms, conflict with national or local policies, or with measures set out in WBC’s Air Quality Action Plan. There are no constraints to the development in the context of air quality.”

6.81. The Council’s Public Protection Services Manager has subsequently confirmed following review of the Air Quality Assessment that the Proposed Development will not have significant impacts in air quality terms and not cause any exceedance in the national standards, and therefore supports the proposals subject to an appropriate planning condition requiring a Construction, Highways and Environmental Management Plan to be required and implemented.

6.82. It is considered that through appropriate measures, there will be **LIMITED** harm.

Utilities, Waste & Energy

6.83. Matters of Utilities, Waste and Energy are considered by ES Technical Papers 10, 11 and 12 respectively. Each of the papers identifies that there will be certain effects, but that these are not significant and therefore in terms of harm would be considered as **LIMITED** harm.

### Very Special Circumstances – Considerations that weigh in favour of the Proposed Development

6.84. We now consider whether there are “other considerations” in favour of the Proposed Development that could outweigh any harm to the Green Belt, and any other harm, and hence constitute “very special circumstances” in accordance with paragraph 148 of the NPPF (21).

6.85. There is a significant amount of case law on the issue on what constitutes very special circumstances. R (Wildie) v Wakefield Metropolitan BC [2013] provides some guidance on this matter:

*“First, the correct approach to the very special circumstances test is to ask the following question (adapting the wording of §70 in [Doncaster Metropolitan Borough Council v Secretary of State for the Environment, Transport and the Regions [2002] EWHC 808 (Admin)] (as approved by Carnwath LJ in [Wychavon District Council v Secretary of State for Communities and Local Government [2008] EWCA Civ 692 [2009] PTSR 19] §26)):*

*“Given that inappropriate development is by definition harmful, the proper approach [is] whether the harm by reason of inappropriateness and the further harm, albeit limited, caused to the openness and purpose of the Green Belt was clearly outweighed by the [countervailing benefit arising from the development] so as to amount to very special circumstances justifying an exception to the Green Belt policy”*

*“Thus, in considering whether to allow development in the Green Belt, the decision maker must consider, first, the “definitional” harm arising from the inappropriate development as well as such further harm to the Green Belt as is identified as being caused by the development in that case, and then secondly consider countervailing benefits said to be served by the development; and then consider whether those benefits clearly outweigh the harm so as to amount to very special circumstances. Secondly, in order to qualify as “very special”, circumstances do not have to be other than “commonplace” i.e. they do not have to be rarely occurring. Thirdly, the test is not one of whether the harm to the Green Belt (definitional or specific) is “significant or unacceptable”, either of itself or following the balancing exercise. S74 and 75.”*

6.86. As such, it is evident that a balancing exercise should take place and the benefits of the Proposed Development must clearly outweigh the harm in order to constitute ‘very special circumstances’. Mrs Jean Timmins, A W Lymn (The Family Funeral Service) Limited v Gedling Borough Council v Westerleigh Group Limited [2014] established that “in practice the very

*special circumstances will invariably be much more affected by issues of ‘need’ and the availability of alternative sites than visual amenity”.*

6.87. It is relevant to note that the different considerations that go towards reaching a conclusion that very special circumstances exist do not of themselves need to be very special.

6.88. In respect of this application, the ‘very special circumstances’ considerations comprise the following:-

- 1) The Policy support for the Proposed Development;
- 2) The general employment need for the Proposed Development;
- 3) The urgent Occupier led need for the Proposed Development;
- 4) Whether there are any other sites to meet the need that do not lie within the Green Belt
- 5) Whether the Proposed Development is suitable / deliverable;
- 6) The employment created by the Proposed Development;
- 7) The training, skills and jobs created by the Proposed Development;
- 8) The investment in the local economy;
- 9) The recreational and health benefits;
- 10) The significant tree planting associated with the Proposed Development;
- 11) The improvements to surface water drainage;
- 12) Net-Biodiversity Gain; and
- 13) The benefits to traffic and transport

**Consideration 1: The policy support for the Proposed Development**

6.89. The Core Strategy’s (CS) ‘Vision in 2027’ seeks to ensure that the town continues to be a key economic driver and the focus for employment for the surrounding area. However, based on the low growth expectations, the CS also seeks to limit the outward growth of the town and protect the Green Belt in its current form.

6.90. These ambitions are reflected in the CS Strategic Objectives W1 and W2, which seeks to secure the regeneration of the older areas of the town, strengthen existing neighbourhoods (by tackling issues of deprivation and worklessness), safeguard the permanence of the Green Belt, and support the growth in the local and sub-regional economy by the provision of 277

hectares of employment land between 2006 and 2027. Critically the strategy is premised on the following assumptions:

- There is sufficient land outside of the Green Belt to meet the demand for employment land within the Borough during the plan period;
- Warrington's economy would continue to grow and prosper without the need for any new strategic employment sites; and
- Any employment development that took place outside of the urban area and the existing employment areas would draw investment away from those older areas of the town in need of regeneration.

6.91. The evidence produced to support the review of the Local Plan demonstrates that these assumptions are not justified and highlights a significantly higher employment land requirement than previously envisaged within the CS.

6.92. Since the adoption of the CS, as part of their bid for a devolution deal with the Government, the Cheshire and Warrington LEP proposed that through their interventions that employment would grow in Warrington by 31,000 to 2040, alongside an additional 24,000 jobs in its immediate economic hinterland in the Liverpool City Region. This objective is embedded in the 'Warrington New City' concept which in turn has been incorporated into Cheshire and Warrington LEP's Refreshed Strategic Economic Plan and 'Warrington Means Business'.

6.93. The Warrington Means Business document has been updated in 2020. It is the Council's Economic Growth and Regeneration Programme and it re-confirms the scale of the need for new employment land and that *"Omega, Gemini, Woolston and Birchwood are major successes as employment areas – however these sites are almost full and there is a realisation that Warrington will run out of suitable new sites for business development"*. It assesses the opportunities to achieve this and it specifically includes (on page 23) Six56 (the Proposed Development) as one of its *"Priorities – Connected Business locations"*. It confirms that *"this new business area will be one of the best located new logistics and business destinations in the UK straddling two key motorways and centrally located mid-way between the Liverpool and Manchester conurbations. Subject to the Local Plan's progress and the planning process, this extended site will come on stream in 2020"*. This latest statement of the Council's economic strategy can be given weight in the planning assessment of this Application Proposal.

- 6.94. The Council commissioned an Economic Development Needs Study (EDNA) (August 2021) to provide a robust evidence base to inform the emerging Local Plan in respect to identifying the future quantity of land required for economic development uses and to analyse the alternative site opportunities to meet that need.
- 6.95. The EDNA confirms that the growth in e-commerce has boosted an already strong logistics market and that the North West reflects this high demand but that it has significant supply problems. It confirms that the employment land supply within Warrington has reduced from 104.53 ha in 2019 to 38.87 ha in nine sites in March 2021 and of that 38.87 ha of supply, 26.17 ha (8 sites) form local supply and hence only one site (12.7 ha) is strategic supply.
- 6.96. The EDNA establishes an Objectively Assessed Need of 316.26 ha based upon past take up rates which equates to an additional requirement of 277.39 ha (in addition to the existing supply of 38.87 ha) which must come from the Green Belt.
- 6.97. The EDNA confirms in paragraph 5.9 that from their detailed, evidence based assessment of all potential sites that could form allocations within the draft Local Plan, only the Application Site receives an A+ grading meaning it has limited constraints and could be developed immediately to meet strategic needs. It therefore ranks the Application site as the Number 1 potential strategic employment site in Warrington. The EDNA therefore endorses the Application Site as the most suitable employment opportunity to meet strategic needs within Warrington.
- 6.98. Based upon this evidence, the Proposed Submission Version Local Plan (Sept 2021) identifies that Warrington's new 'objectively assessed employment land need' is 316.26 ha in order to ensure that supply meets demand. Based on a robust assessment of the capacity of the existing urban area, the Proposed Submission Version Local Plan identifies a need for 227.39 ha of Green Belt release to meet the employment need to 2038 of which the South East Warrington Employment Area (which includes the Application Site) will provide 136 ha. As such, the most recent evidence base demonstrates that the employment land requirement is exponentially more than previously calculated and cannot be satisfied by sites within the Urban Area and the Existing Employment Areas.
- 6.99. CS Strategy Policy CSI establishes some general principles to which new development 'must have regard'. It reflects paragraph 11 of NPPF (21), stating that where relevant policies are out-of-date at the time of making a decision then permission will be granted unless material

considerations indicate otherwise, and taking into account whether any adverse impacts would significantly and demonstrably outweigh the benefits. Policy CS2 then sets out the broad locations to which new development should be directed, seeking to prioritise brownfield land and maintain the Green Belt. The policy stipulates that the main focus for business (non-town centre uses), general industrial and storage/distribution developments will continue to be the existing employment areas of the town principally Birchwood Park, Gemini and Winwick Quay (within the wider A49 corridor), together with further sites at Woolston Grange and the strategic location at Omega and Lingley Mere. It also highlights that Major Warehousing and Distribution developments will be located away from areas sensitive to heavy vehicle movements, with direct access to the Primary Road Network, and where possible with access to rail and /or Ship Canal.

- 6.100. The Warrington Proposed Submission Version Local Plan is clear that the Council can only demonstrate a realistic supply of 38.87 ha of employment land in the urban area and a further 31.80 ha in St Helens Omega Extension i.e. a total of supply of 70.66 ha. Therefore, it is evident that there is insufficient capacity within the urban area and existing employment areas to meet the current level of demand for employment land set out in the updated EDNA (2021).
- 6.101. The Council's evidence base (EDNA 2021); economic strategy (Warrington Means Business 2020); and planning policy approach (Submission Draft Local Plan) all show that:-
- The scale of employment and logistics need has been evidenced and quantified;
  - The urban capacity to meet this need has been assessed;
  - That additional land is required to meet the need and that this land must be found from within the Green Belt; and
  - That the Application Site is the preferred location to meet the need for B8 development.
- 6.102. The above conclusions are supported by the regional and sub-regional studies relating to the Northern Powerhouse, Atlantic Gateway and through the Statements of Common Ground between Authorities. The Warrington Statement of Common Ground (Sept 2021) addresses cross boundary working. It confirms the scale of employment need within the Submission Draft Warrington Local Plan and also the Land at M56 Junction 9 employment allocation (including the Application Site). It confirms in respect of Green Belt (paragraphs 4.15 – 4.17)

that Warrington shares its Green Belt boundaries with Cheshire East, Cheshire West and Chester, Halton, Salford, St Helens, Trafford and Wigan Councils. All adjacent Authorities were consulted in respect of the Warrington Green Belt review and raised no objections other than Halton.

- 6.103. This conclusion is supported in the Liverpool City Region Statement of Common Ground (October 2019) which covers the Authorities of Halton, Knowsley, Liverpool, Sefton, St Helens, West Lancashire, Wirral as well as the Liverpool City Region (LCR) Metro Mayor and LCR Combined Authority. A new LCR Spatial Development Strategy is being prepared. The Statement of Common Ground confirms in paragraph 4.8 that *“the key identified employment land issue for the LCR is the need for strategic B8 sites. The LCR SHELMA indicated that the city region authorities need to identify sites with a combined capacity of at least 397 hectares to be developed for large scale B8 (storage and distribution) before 2037”*. It also confirms in paragraph 4.10 that *“Knowsley, Sefton and West Lancashire Councils have undertaken reviews of Green Belt boundaries which have formed key evidence for adopted Local Plan documents. St Helens and Halton Councils have undertaken draft Green Belt reviews to inform their emerging Local Plans and Wirral Council consulted on the findings of an initial review of Green belt in autumn 2018. It will be necessary for the LCR local authorities to continue to consider this matter by responding to development needs and pressures as considered appropriate locally”*.
- 6.104. It is evident from both Statements of Common Ground that all authorities within Liverpool City Region and Warrington have recognised the importance of delivering new employment land especially for B8 logistics uses and that each one has had to review their Green Belt boundaries to meet the identified needs.
- 6.105. As will be demonstrated in the next section, there is an over-riding need to deliver new employment sites both within Warrington and the Liverpool City Region to meet the scale of demand that exists NOW in this location. The EDNA (August 2021) confirms that the available land at Omega could be taken up within one year and that there are delivery challenges with the draft employment allocation at Fiddlers Ferry in Warrington, meaning that the Application Site must be brought forward now to allow existing demand to be met within Warrington.
- 6.106. The above conclusions of the Council’s evidence base are supported by the findings of the Market Report produced by JLL (dated 2019) to supplement the Alternative Site Assessment appended to the original ES Part I Report commissioned by the Applicant. This has been

updated further by evidence contained in JLL Proof's of Evidence relating to logistics proposals on the former Parkside Colliery site, which lies in St Helen's but on Warrington border and the Omega West site which also lies in St Helens, but is on the border of Warrington. This evidence has been presented at the Called-In inquiries and remains relevant to the Application Proposals as it contains evidence on the need and demands for employment land and premises.

- 6.107. Its detailed conclusions are set out in "consideration 3" of this Replacement Planning Statement but it confirms that there are a significant number of current occupier requirements that cannot be accommodated by the current supply of employment land. It also identifies that take-up of new employment sites has been strong in recent years, but there is the growing imbalance with a chronic lack of supply and high demand, which has resulted in large occupiers struggling to find open ready sites to accommodate their expansion within Cheshire. In addition, the lack of supply is also affecting small to medium-sized (SME's) occupiers hindering their growth plans which in turn stifles potential employment growth.
- 6.108. This conclusion is also confirmed in the Secretary of State (SoS) decision for Wingates, Bolton (ref: 3253244) and Symmetry Park, Wigan (ref: 3253242) which were issued in June 2021 and more recently in the SoS's decision to grant planning permission at the former Parkside Colliery site (ref: 3253194) and Omega West (ref: 3265899) confirmed recently on the 11<sup>th</sup> November 2021. These are considered in more detail in "consideration 2" but it is worthy of note here that the Secretary of State granted planning permission for all three schemes in the Green Belt due to the *"evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally."* (paragraph 22 of Symmetry Park) and *"pressing commercial need for new logistics floorspace at a local, Liverpool City Region (LCR) and North West level and an evident need for development of the type proposed, and that the need for employment land has to be afforded very substantial weight."* (Paragraph 28 of former Parkside Colliery).
- 6.109. As shown, the new evidence base provides a clear impetus to bring forward the Proposed Development to meet an identified need for employment land that can accommodate large floorplate B8 warehousing and logistics uses. The emerging Policy direction supports this approach and also specifically supports the allocation of the Application Site for employment purposes.
- 6.110. This is consistent with the requirements of the NPPF (21) which in its economic objectives seeks to *"build a strong, responsive and competitive economy"* (Para 8). It also confirms at Paragraph 81 that *"significant weight should be placed on the need to support economic growth and*



*productivity, taking into account of local business needs and wider opportunities for development” and “the approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of future”.*

- 6.111. Of particular relevance in this application is Paragraph 83, which requires planning decisions to “recognise and address the specific locational requirements of different sectors. This includes making provision for... storage and distribution operations at a variety of scales and in suitably accessible locations”. This is a clear statement from Government that planning decisions need to take account of the specific locational requirements of the storage and distribution sector particularly its need for locations near to existing motorway junctions in order to ensure the fast transit of goods and to minimise the impact on local highway networks and local communities.
- 6.112. We have set out in the Alternative Sites Assessment what those locational requirements are and why the application is sequentially the best site to meet these requirements within Warrington. The location of the Proposed Development is clearly compliant with the requirements of bullet point 8 of Policy CS 2 that stipulates that major warehousing and distribution developments should be located away from areas sensitive to heavy vehicle movements and in locations with direct access to the Primary Road Network. In addition, the Application Site meets the ‘locational land needs’ for strategic B8 uses set out in the EDNA, which identifies that immediate motorway access on to the M6 and M56 Corridors is essential as is the capacity for 24-hour operation (amongst other things). As such, the Application Site has specific characteristics which meet all these locational requirements.
- 6.113. As identified within the Core Strategy, the problems of deprivation and worklessness are present within Warrington. The opportunities provided by sites such as the Application Site deliver economic multipliers as they are strategically located to be attractive to regional and national employment/logistics operators, which in turn enables and stimulates other sectors of the economy (The Northern Powerhouse Independent Economic Review). Whilst the EDNA does identify sites within the urban area that could accommodate employment development, it confirms that these do not meet the requirements for large scale logistics occupier’s i.e. strategic sites. For the reasons outlined in CS Policy CS2 and the EDNA these urban sites are not suitable to accommodate major warehousing and distribution developments because of the strain they would place on existing neighbourhoods, local infrastructure and the highway network. Whilst SME’s are a vital component for the local

economy, they do not have the ability to expand to meet exponential economic growth requirements. Sites that are capable of accommodating larger units close to motorway junctions are therefore vital to achieve this vision in accordance with paragraph 83 of the NPPF (21).

- 6.114. The Appleton Thorn Neighbourhood Plan does not allocate sites for large scale employment development. However, Policy AT-E1 notes that development will be permitted were the option for conversion has been considered and the proposal is an appropriate scale to the area. In addition, the policy also states that development should not have a detrimental impact on surrounding residential character and amenity, should not lead to loss of open space or green infrastructure, and the development should have a good connection to the highway network and is acceptable in terms of highway safety and parking.
- 6.115. The Application Site is located adjacent to the Barleycastle Trading Estate which the Core Strategy recognises as an appropriate location for warehouse and distribution uses and is an area where large industrial buildings are already present. The Application Site is strategically located close to the M56/M6 Junction and would deliver significant improvements to the local and strategic highway network. There are no buildings that are capable of conversion that would meet the space requirements of the Proposed Development in whole or part in Appleton Thorn or the wider Borough.
- 6.116. Warrington Council recognise the need to positively plan for economic growth for the benefit of the Borough and to capture the economic benefits of the logistics sector. This is an established economic policy requirement which has grown significantly since the adoption of the Core Strategy. The Proposed Development is supported by the Local Plan evidence base; Warrington Means Business (2020); the Submission Draft Local Plan (Sept 2021); the Northern Powerhouse and Atlantic Gateway; and the NPPF (2021). We consider that this over-riding policy support for employment development in this location is a significant material consideration in favour of the planning application. As such, we therefore attach **SIGNIFICANT** weight to this policy direction which is in line with the weight ascribed to such conclusions by the Secretary of State in the Symmetry Park decision (paragraph 29).

### **Consideration 2: The general employment need for the Proposed Development**

- 6.117. The application is made in the context of a considerable shift in economic evidence that it is informing the emerging Local Plan for Warrington. The context to this Application Proposal

in economic terms is set out in greater detail within the Socio-Economic Technical Paper 6 of the ES Part 2 and its Addendum. This highlights the various initiatives that are taking place in the City Region and across the Northern Powerhouse, that recognise the importance of the employment and especially the logistics sector (The Atlantic Gateway Strategic Plan and Northern Powerhouse Independent Economic Review). The Northern Powerhouse logistics strategy predicts that the logistics sector will grow by 83% between 2013 and 2035. In addition, the latest research into the Port of Liverpool predicts that, due to the increase in port trade, there is a need for 400 ha of land for logistics uses in the sub region over the next 20 years (EDNA: Table ES2-Areas of Search for Employment Land).

- 6.118. Significant evidence on the need for logistics sites has been presented to the Called-In inquiries in respect of five sites across the North West region. Spawforths presented evidence with respect to the former Parkside Colliery site which is in St Helens but which lies on the Warrington border. Further evidence has also been presented with regard to the site at Omega West which is also within St Helens but which also lies adjacent to Warrington. The Secretary of State has now granted planning permission for four of the call-in schemes at Wingates, Bolton, Symmetry Park, Wigan, former Parkside Colliery, St Helens and Omega West, St Helens. The Secretary of State confirmed in the Symmetry Park decision (paragraph 23) that he “agrees with the Inspectors’ finding that due to the attraction of the M6 corridor for logistics operators, employment land supply has been unable to keep pace with demand and is now critically low”. Furthermore, the Inspector’s Report to the SoS in respect of the former Parkside Colliery site highlighted the critical shortage of supply in the North-West expressed by witnesses at the inquiry with the Inspector confirming there is therefore a pressing commercial need for new logistics floorspace at a local, LCR, and North-West level, therefore the need for employment land has to be afforded very substantial weight.
- 6.119. The Inspectors Report for the Parkside decision confirmed “*Evidence to the Inquiry confirms that national and regional distribution markets are subject to high levels of demand brought about by the change in shopping habits, particularly the strong growth in e-commerce. This trend was well established prior to the Covid-19 pandemic, which has served to accelerate the growth of the logistics sector. This is demonstrated by the fact that Grade A take-up in 2020 for the Greater Warrington Market Area was not the highest in the last ten years.*”
- 6.120. *There is extensive market evidence of robust growth in the warehousing and logistics sector of the economy of the North West, with a strong and rapidly expanding need for large-scale storage and*

*distribution and industrial units of the kind proposed in this case. In the context of this demand, there was a strong consensus between the professional land supply witnesses that there is a critical shortage of supply in the North-West. Current Grade A supply is only 154,712m<sup>2</sup> in nine units. Based on the ten-year average take up this equates to approximately eight months' supply. At that level of supply and given lead in times, the reality is there is very little, or no, immediately available supply."*

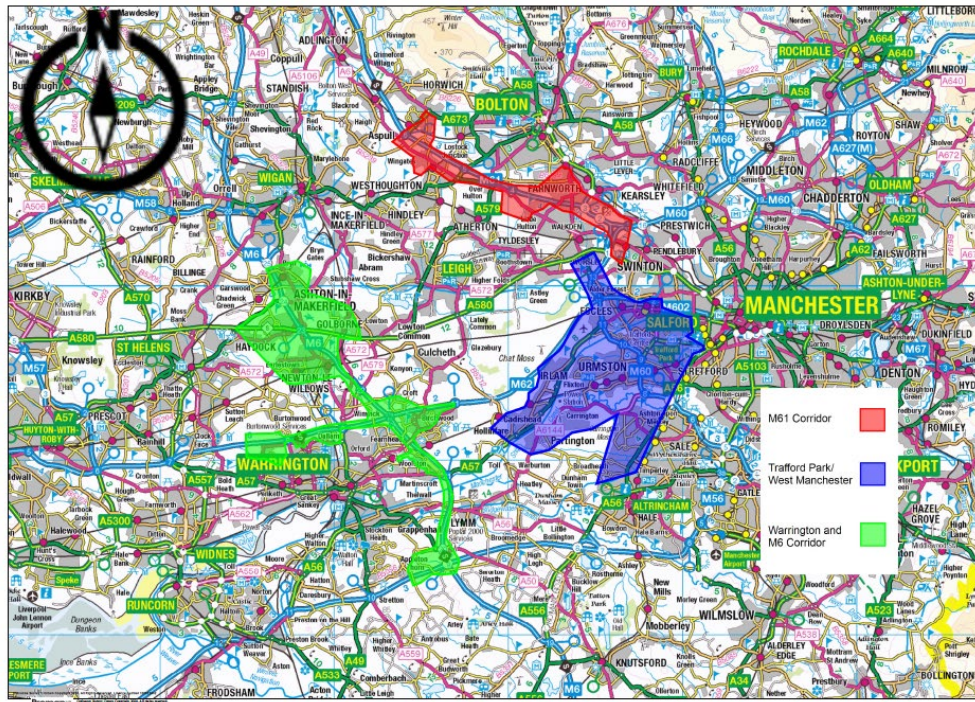
6.121. As part of the Parkside evidence, Langtree commissioned JLL to produce evidence on the need and demand for employment land and premises. This proof of evidence and appendix is included as **Appendix I** to this Replacement Planning Statement. The JLL evidence sets out a detailed analysis of the national regional and local market for logistics; market trends; demand; supply; and employment land within Boroughs that adjoin St Helens (including Warrington). JLL's conclusions were that:-

- The logistics sector has developed from traditional storage and distribution uses expanding to include multi-channel retail which has caused an increase in demand for warehouse premises.
- The impact of Covid 19 on the sector nationally has accelerated the move from High Street retail to internet purchases among the general public with the e-commerce sector accounting for over 34% of the national take up of Grade A warehouses in Q1 – Q3 2020. It has increased occupier requirements due to social distancing. When combined with Brexit it has increased the need for resilience in the supply chain for all sectors.
- Regional Grade A take up to date in 2020 is 274,765 sq. m. This has exceeded both the five- and ten-year regional averages of 209,000 sq. m and 231,000 sq. m respectively. This is not the highest annual take up over the last ten years suggesting this is not a one-year spike.
- There are only 10 logistics buildings available or under construction totalling 171,026 sq. m in the North West - one of these is under offer. This equates to approximately 9 - 10 month's supply based on the ten- and five-year average take up respectively. There is an extremely limited development pipeline of units and suitable development sites. This is already having an adverse effect on the market with a lack of buildings going forward and will cause a lag in the availability of buildings to the market.
- There are approximately 49 industrial and logistics requirements currently in the North West for units over 9,292 sq. m. The total floor area requirement is between 1.043m<sup>2</sup>

to 1.341m<sup>2</sup>. The requirements are for a mixture of existing buildings or build to suit. There is a large imbalance between building supply and demand where current supply cannot satisfy demand. This is to the detriment of the economy.

- Quantitatively and qualitatively there is a shortage of suitable development sites capable of accommodating the requirements within the region.
- Model Logic, a logistics consultancy has prepared an Independent Logistics Study confirming Parkside as one of the prime locations in the North West for a regional distribution centre in terms of motorway access, population density/catchment area and last mile delivery. This confirms its suitability for development for the logistics sector.
- Parkside is located in the wider Warrington/M6 corridor (junctions 20 – 25) market sector. This is a popular market location given the motorway intersections/connectivity. The majority of requirements in the North West are for buildings and sites in this market location. There have been four lettings of large floorplate units over 27,870 sq.m in this market sector totalling 149,067 sq. m in the last three years.
- In addition to Parkside there are three additional sites being considered at Call-In. There is sufficient demand and a need for a suitable land supply to develop all four sites which have a combined floor area of 452,423m<sup>2</sup>
- In summary there is an extreme shortage of available and deliverable sites to satisfy demand in the North West. If this planning consent was to be refused it will have an adverse impact on the regional economy. Companies will relocate to other regions where there is supply or operate inefficiently from existing facilities which will potentially put their businesses at risk. Parkside is located in an attractive location along the M6 corridor which is in demand and is deliverable in a realistic timescale.

6.122. JLL's conclusions in respect of Parkside are equally valid for the Application Site. JLL set out a plan of the key logistics locations within the appendices of their Proof of Evidence. They reference the "Warrington and M6 Corridor" as a key locational corridor which is attractive to the logistics market. Both Parkside and the Application Site lie within this market corridor as shown below:-



6.123. Similar evidence was presented to the other Call-in inquiries as each developer (and local authority) agreed with the broad conclusions that there is a chronic shortage of large scale strategic logistics sites to meet the demand. The Secretary of State accepted in the Parkside, Wingates and Symmetry Park decisions that supply is critically low. All Inspectors' Reports confirmed the over-riding need for employment land which the Symmetry Park Inspector noted in paragraph 10.26 as "based upon the foregoing, there is an evident and compelling planning policy imperative for high quality, logistics floorspace regionally, sub-regionally and locally". The "sub-regionally" reference is the subject of a footnote which confirms that this relates to the "M6 sub-market area is defined as the area between Junctions 20 and 26 and includes the local authority areas of Wigan, St Helens and Warrington". He also notes in paragraph 10.28 that "The M6 corridor is centrally located to supply chains and markets and has seen unprecedented levels of inward investment in the logistics sector over the last decade". With regard to supply, the Inspector confirms JLL's conclusion, noting in paragraph 10.31 that "due to the attraction of the M6 corridor for logistics operators, employment land supply has been unable to keep pace with demand and is now critically low, amounting to only around six months of supply based on annual average take-up rates. There is a similar situation in the wider North West region, with approximately nine months of supply".

6.124. It clear from the above that there is a significant need for more strategic employment sites within the North West and within the M6 corridor (including Warrington) in particular and that this conclusion has been recently endorsed by Planning Inspectors and the Secretary of State.

6.125. JLL made reference to a Model Logic report for Parkside. A similar Independent Report has been undertaken by Model Logic Ltd for the Application Site. It is included as **Appendix 2** to this Replacement Planning Statement. Model Logic is a supply chain and logistics consultancy with a 30 year track record of delivering complex strategic supply chain projects to a wide range of Blue Chip organisations across numerous industry sectors. They provide a range of strategic and operational modelling tools to provide a framework for evaluating optimal locations for Blue Chip Logistics operators to locate their distribution hubs and warehouses. In effect they look at the location of key sites from an operator point of view.

6.126. The Model Logic assessment sets out retail network configurations and assesses a range of parameters for strategic sites as follows:-

Although the shape and size of an operator's network will vary dependent upon the nature and size of the business, the principles of network design remain the same. A range of parameters are included within an analysis, including:

- Location and demand of customers, either Business-to-Consumer (B2C) or Business-to-Business (B2B)
- Required service offering to customers in terms of supply lead time
- Source location of products together with their characteristics in terms of size, weight, stock levels and value
- Primary and secondary transport parameters, including vehicle capacities and operating costs
- Warehouse parameters, in terms of size, operating methods and costs, both development and operational
- Motorways, regional and local road network, including road speeds
- Availability of local labour and ease of travel to work

6.127. They then model the supply chain in respect of these parameters and rank sites / locations based upon a balance between service, cost and sustainability. Sites / locations are categorised into gold, silver and bronze locations. They assess drive times to population centres and conclude that the Application Site benefits from its proximity to the high population densities of Liverpool, Manchester and Warrington. They assess 90 min and 45 min drive time catchments. For the 90 min catchment they note that the North West region is bettered only by the South East and that Junction 20 of the M6 can reach a population of 14,881,952 which ranks highly. For the 45 min catchment they conclude that J20 of the M6 (the Application Site) is the best performing location, capable of accessing a population of 6,354,293. They also evaluate locations as an Import Centre (via Liverpool2) and show junction 20 of the M6 as a “gold” location.

6.128. Model Logic outline the types of companies who may be attracted to the Application Site:-

## Client Considerations – Types of Companies

This section of the Study describes some of the likely types of end users who should be attracted to the Six 56 site.

### Companies with a Network of Regional Warehouses (90 minutes stem drive time)

- Grocery retailers (eg Asda, Tesco, Waitrose)
- Non grocery retailers, including electrical and fashion (eg John Lewis)
- Food and drink wholesalers
- General wholesalers
- Parcels hub (eg DPD, Parcelforce, UPS)
- E Commerce hub (eg Amazon, DHL, Hermes)
- If national, could have 6-10 sites around the country

### North West Manufacturing Companies wishing to Operate a National Distribution

- Local food and drink producers (eg Kelloggs, Heinz, Princes, Halewood, Interbrew, Diageo)
- Local non food manufacturers (eg Astra-Zeneca, Unilever)

### Importers (via Liverpool)

- Irish food and drink producers (eg Diageo, Glanbia, Oaklands)
- Imports from USA, Canada and S America
- Raw materials and ingredient suppliers
- Imports on behalf of retailers (eg Adidas, Asda, Asos, John Lewis, Primark)

### Companies undertaking Local deliveries (45 minutes stem drive time)

- Any company undertaking "last-mile" deliveries
- Home grocery delivery (eg Amazon Fresh, Ocado, Waitrose)
- Home non grocery delivery (eg Amazon, John Lewis)
- Parcels depot (eg DPD, Parcelforce, UPS)
- If national, could have 20-25 sites around the country

Model Logic

20

- 6.129. The Model Logic assessment confirms that from a Logistics operator point of view, the Application Site ranks highly when compared to other sites and locations as set out over the page:



## Conclusions

Based upon the detailed modelling and analysis undertaken within the Study, Six 56 ranks highly when compared to other sites and locations. The main observations are:

1. Six 56 is located near the centre of the North West's motorway network, which means that the geographical area that can be covered within a particular drive time zone is large, when compared to other locations
2. Six 56 is located near the centre of the high population belt of Liverpool, Warrington and Manchester. This means that the extensive drive time area contains a large population of potential customers
3. With the exception of South East England, the North West has the highest level of population accessible within a 90 minute drive time. This makes it a prime location for regional distribution centres. Within the North West region, Six 56 is one of the top locations
4. Six 56 is a prime site to locate an Import Centre linked to Liverpool2 docks. The Import Centre could be considered as a stand alone site or its role could be combined with providing regional distribution
5. When compared to other deep sea ports, Liverpool2 has the minimum road transport costs to a network of regional distribution centres supporting their individual customer bases. This should add to the credentials of Six 56 as a good location in terms of sustainability
6. Six 56 is an excellent location to operate local or "last-mile" distribution and utilise sustainable electric vehicles
7. Given its location, Six 56 has an excellent catchment area for recruiting staff

Model Logic

22

- 6.130. There is a significant need for new employment floorspace particularly for logistics in the Borough, region and the wider UK. The logistics sector is a key growth area for the region and will be an important catalyst for further economic development. By expanding the logistics sector in Warrington, which has a strong history of successful logistics investments due to its proximity to the motorway network and its strategic location between Liverpool and Manchester, the Application Proposals will make an important contribution in achieving the Government's Northern Powerhouse ambitions.
- 6.131. There is a significant need for logistics floorspace to serve the North West and the Cheshire and Warrington sub-region, which occupies a strategic location with close links to Manchester, Liverpool and the Midlands, with unique cross border opportunities with the Mersey Dee Economic axis (connecting with North Wales). The area is also well positioned to take advantage of the continued major investment in the Port of Liverpool, including the new Panamax container terminal as well as the significant investment and growth in the Cheshire Science Corridor.
- 6.132. The locational advantage of Warrington to the logistics sector is also evidenced by the proven success of Omega, which enhances Warrington's reputation as a centre for logistics and distribution. Omega North is now substantially complete and occupied, therefore there is a

need for new large-scale sites, with similar locational advantages in the South of the Borough to meet the needs of logistics operators in the sub-region. The logistics sector has consistently driven growth in the Borough, and the forecasts set out in the Local Plan evidence base forecast high jobs growth in distribution, transport and storage sectors. Warrington is the premier North West M6 centric location. Omega has been one of the most successful industrial and logistics development sites in the North West with over 5 million ft<sup>2</sup> being built out at Omega.

- 6.133. The Warrington EDNA (August 2021) confirms in paragraph 4.7 that “nearly two thirds of the Local Supply and all the remaining Strategic Supply are likely to have been developed within five years.....Omega Phases 1 and 2 Remainder (Mountpark Phase 2) has commenced and this last parcel of employment land in Omega South could be completed within a year”.

**Table 9 – Use Class Assessment (Realistic Supply)**

Location	Use Class					Total, ha
	E(g)(i)	E(g)(iii)/B2	B8	E(g), B2, B8	Strategic B2/B8	
Appleton	-	-	1.79	4.69	-	6.48
Birchwood	-	1.87	-	8.71	-	10.58
Lingley Mere	1.15	-	3.62	-	-	4.77
Warrington Central/ Town Centre	-	-	-	-	-	-
Westbrook	-	-	-	4.34	-	4.34
<b>Local, Sub-Total</b>	<b>1.15</b>	<b>1.87</b>	<b>5.41</b>	<b>17.74</b>	<b>-</b>	<b>26.17</b>
<i>Strategic (Omega)</i>	-	-	-	-	12.70	12.70
<b>Total, ha</b>	<b>1.15</b>	<b>1.87</b>	<b>5.41</b>	<b>17.74</b>	<b>12.70</b>	<b>38.87</b>

Source: BE Group, 2021

- 6.134. This means that there is currently only 12.7 ha of land available to meet the need for large scale (strategic) logistics demand within Warrington. It also confirms that this land could be taken up with a year.
- 6.135. The EDNA confirms in paragraph 5.9 that from their detailed, evidence based assessment of all potential sites that could form allocations within the draft Local Plan, only the Application Site receives an A+ grading meaning it has limited constraints and could be developed immediately to meet strategic needs.

- Only one site receives an initial A+ grade meaning it has limited constraints and could be made available almost immediately, subject to planning, to meet primarily/exclusively strategic needs. This is the **92.0 ha (gross)** Land at Bradley Hall Farm, Cliff Road (Six56) scheme, where development planning for a strategic B2/B8 scheme is at an advanced stage

6.136. The ranking of sites within the EDNA is set out below:-

**Table 16 – Site Submissions Appraisal by Category (Based on Current Grading)**

Category	Number of Sites	Land Supply, ha	Comments
<b>A+</b> Unconstrained/Limited Constraints – Strategic Development Options	1	92.00	Land at Bradley Hall Farm, Cliff Road (Six56) – based on this modelling the strongest strategic option being put forward.
<b>A+/B+</b> Unconstrained/Limited Constraints – Strategic and Local Development Options	6	44.92	Land around Barleycastle Lane, Barleycastle which could be developed for a mixture of local and strategic schemes, with limited constraints evident. Includes one smaller parcel, more suited to local uses, graded B+.
<b>A-</b> Constrained – Strategic Development Options	1	70.00	Six56 Phase II – Further strategic growth option in SE Warrington, but subject to further planning on deliverability, access, etc.
<b>A-/B-</b> Constrained – Strategic and Local Development Options	9	244.68	Including Fiddlers Ferry (101 ha), Port Warrington (60 ha) and seven sites in Rixton. Options for further growth subject to a range of constraints being addressed.
<b>B-</b> Constrained –Local Development Options	2	44.50	Constrained, local only development Options.
<b>C</b> Local Scale Mixed Use Sites/Proposed to Meet Specific Business Needs	8	137.72	By settlement: <ul style="list-style-type: none"> <li>• Burtonwood – 1 site (3.9 ha)</li> <li>• Lymm – 3 sites (124.13 ha)</li> <li>• Stretton – 2 sites (7.29 ha)</li> <li>• Winwick – 2 sites (2.40 ha).</li> </ul> Most are mixed-use proposals, so the impact of the other uses will need to be reviewed separately.
<b>C-D</b> Local Scale Mixed Use Sites (but with greater deliverability questions)	3	33.87	-
<b>D</b> Limited suitability for B-Class Uses	21	102.67	Based on market fit/deliverability, sites are poorly suited for employment development. This does not preclude the possibility that they are suited for other uses.
<b>E</b> Unlikely to be deliverable development site	2	5.94	Assumed undeliverable for most uses.
<b>TOTAL</b>	<b>53</b>	<b>776.30</b>	

Source: BE Group, 2021

6.137. The EDNA therefore endorses the Application Site as the most suitable employment opportunity to meet strategic needs within Warrington.

- 6.138. The EDNA also assesses Warrington's wider economic geography and concludes in paragraph 6.130 that "against the scale of potential needs from the growing Port of Liverpool, the programmed strategic supply in the Liverpool city Region remains modest, creating ongoing opportunities for sites in Warrington". It also confirms that "*sites in neighbouring authority areas, even when of a strategic scale, will ultimately meet the OAN of those authorities rather than Warrington. The only exception to this is the proposed Omega South Western Extension, noted above, which is to meet cross boundary requirements*".
- 6.139. This confirms that there is a chronic imbalance between supply and demand within Warrington (as well as the sub region and region) as logistics operators continue to seek sites for distribution and warehouse facilities in strategic locations with easy access to the region's major transport networks.
- 6.140. This demand for large scale employment sites in strategic locations within the Borough corresponds with the ambitions of the Council's Economic Growth and Regeneration Programme (Warrington Means Business) (2020).
- 6.141. The Application Site meets with the locational requirements and site requirements for logistics operators. These locational characteristics and site requirements cannot currently be fully met at any other locations within the Borough. The Application Site is flat and expansive with no overriding 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. All these attributes are key drivers for logistics operators when making decisions on locations for new employment space. It is logical therefore for employment land to be brought forward in this location which is attractive to the employment market and will continue the success in the Borough provided by Omega.
- 6.142. The Policy context for economic development has changed with the significant uplift in the employment land requirement to benefit Warrington. The Local Plan Core Strategy's need for up employment land is considered to be superseded by the latest evidence base. We consider that the need for employment sites is a significant material consideration in favour of the proposals. We attached **SIGNIFICANT** weight to it.

**Consideration 3: The urgent Occupier led need for the Proposed Development.**

- 6.143. The JLL Proof of Evidence confirms that in the North West there are 49 live requirements in excess of 9,292 sq. m with a total size range of 1.043m sq. m to 1.341m sq. m. There are 15 requirements where the search parameters are over 27,870 sq. m totaling 873,260 sq. m (this includes the TJ Morris requirement which was the subject of the Call-in inquiry at Omega West).
- 6.144. The JLL evidence notes that ten of these requirements are focused on the Greater Warrington market area and that this equates to a floor area requirement of 548,327 sq. m. This confirms the imbalance between supply and demand and provides direct evidence of current unmet occupier need within the North West and within the M6 corridor (Greater Warrington) in particular.
- 6.145. JLL note that *“there is a shortage of deliverable sites in the North West and specifically along the M6 corridor in the Warrington/St. Helens area. This is having an adverse effect on occupiers who are now in the situation where the available supply and pipeline are severely restricted. This will depress demand as companies will have to consider relocating part or all of their business to an alternative location where there is a suitable building or greater supply”*. They also note that *“market failure”* will occur. This has been brought about by a number of factors which include - local authorities not being able to bring sites through the employment allocation process/local plan quickly enough in relation to employment land take up, the change in market requirements outpacing local plans and a reliance on older employment sites which could never satisfy modern occupier requirements”.
- 6.146. Similar conclusions were supported by the Planning Inspectors and Secretary of State in respect of the, Parkside, Wingates and Symmetry Park Call in decisions.
- 6.147. As has been shown in relation to ‘consideration 2’, the Application Site is the best performing site assessed within the EDNA to meet these urgent occupier needs as there is only 12.7 ha of strategic supply available at Omega (which will be taken up within a year) and there are short term delivery constraints at Fiddlers Ferry. The Application Site is therefore urgently required to maintain a continuity of supply within Warrington to ensure that these occupier requirements can be met within the Borough to deliver the economic benefits to the Borough.

- 6.148. This Replacement Planning Statement has confirmed that each Local Authority within the sub-regional is also releasing land from the Green Belt to meet the need for logistics and that through Statements of Common Ground, this has been done in a coordinated way such that it is recognised that all Green Belt releases are required to meet the scale of need. The Omega West site (which was the subject of a Call-in inquiry) lies within St Helens but it has been agreed between St Helens and Warrington that it will count towards Warrington's need (not St Helens). This however is already committed by TJ Hughes who are a large Liverpool based employer and hence the land is not available to meet wider occupier requirements.
- 6.149. The Model Logic Logistics Report appended to this Replacement Planning Statement and summarized in 'consideration 2' also confirms that the Application Site meets with the locational and site requirements for logistics operators and end users and has all the site characteristics that are key drivers for logistics operators when making decisions on locations for new employment space. It is logical therefore for employment land to be brought forward in this location which is attractive to the employment market.
- 6.150. The urgent need to meet occupier requirements is therefore a significant material consideration in favour of the proposals. We attached **SIGNIFICANT** weight to it.

**Consideration 4: The lack of alternative sites to accommodate the Proposed Development outside of the Green Belt**

- 6.151. The Alternative Site Assessment submitted with the Application Proposals considers the availability of sites to accommodate the Proposed Development. This Assessment considered a number of sites and concluded that there are no sequentially preferable sites available to deliver the Proposed Development in part or in whole and the assessment of regional, sub-regional. As set out in 'considerations 2 and 3', this conclusion has been endorsed by the EDNA (August 2021) which considered both existing urban capacity and the availability of other potential sites that lie within the Green Belt. It concluded that there was only 12.7 ha of currently available land to meet the strategic logistics need (which will be taken up within a year) and that the Application Site is the best performing Green Belt alternative. This further supports the need for the development of the Application Site for employment development to help meet the employment need in the Borough.
- 6.152. For robustness, we undertook an assessment of the potential other sites which accompanies this planning submission and forms an appendix to the ES Part I Addendum. Our study

considered the availability of sites to accommodate the Proposed Development. It considered both urban and Green Belt sites and applied a scope for disaggregation to determine if sites may be available to accommodate component parts of the Application Proposal. The smallest development cell (Zone A) within the Application Site is 2.33 Ha. However, this cell has been included to make best use of the residual land and is below the 5 ha minimum criteria for meeting the B8 Strategic Need identified in the EDNA (2016). For robustness the study has considered the potential for sites below that threshold, although clearly the general approach of the Application Site is for provision of large floorplate units.

- 6.153. Sites with permission for employment development and built out with unoccupied units and sites that have been promoted and are identified in the emerging Local Plan are also considered. In addition, a number of existing employment sites identified in both the adopted Core Strategy and referenced as available in the EDNA (2019) have been considered and discounted. The Alternative Sites Assessment report provides further commentary outlining the reasons these were discarded and discounted.
- 6.154. The assessment takes a series of stages. **Stage 1** is to establish whether the identified sites meet the minimum requirements for logistics development, namely proximity to the motorway network, good access to this via A roads, public transport connectivity and ability to mitigate for sensitive uses where these are present.
- 6.155. **Stage 2** then considers a range of additional factors to establish the suitability of development such as site shape and proximity to workforce.
- 6.156. **Stage 3** then assesses the remaining sites and considers the approach taken by the Local Plan and Green Belt Assessment in 2016 and 2017. This approach has been agreed and accepted by the Council as it has assessed the Application Site in the Green Belt Assessment and concluded that it is suitable to take forward for development in the emerging Local Plan.
- 6.157. The Assessment considered nine sites. A plan of the sites is included within the Appendices of the Alternative Site Assessment. This Alternative Site Assessment demonstrates that the Application Site is the most appropriate site in overall planning terms and as such the Proposed Development should be directed here and not elsewhere. Nevertheless, it is clear that all the sites considered as part of the ASA are required to meet the employment needs of the borough over the plan period.

Following review of the Alternative Sites Assessment, the Council requested that we consider further alternative sites extending the geographical area of search, including Fiddlers Ferry and those outside the Borough on a regional and sub-regional level, along principal motorway corridors, to support the Application.

In terms of Fiddlers Ferry, despite its proposed allocation in the Submission Version Local Plan, there is an acknowledgement from the Council that the former power station site will need to be decommissioned and remediated, therefore there will be a long lead in time prior to any redevelopment. Furthermore, the site has poor motorway connectivity for use as a logistic sites, therefore this is limited competition when compared to the Application Site, based on its location and deliverability, given the need is now.

In terms of the regional and sub-regional level, evidence already commissioned by Langtree and prepared by JLL as part of a proof of evidence for the Parkside Call-In inquiry, already set out in paragraph's 6.123 and 6.124 of this Replacement Planning Statement sets out a detailed analysis of the national regional and local market for logistics; market trends; demand; supply; and employment land within Boroughs that adjoin St Helens (including Warrington). This confirmed that there are only 10 logistics buildings available or under construction totalling 171,026 sq. m in the North West - one of these is under offer. This equates to approximately 9 - 10 month's supply based on the ten- and five-year average take up respectively. There is an extremely limited development pipeline of units and suitable development sites. There are approximately 49 industrial and logistics requirements currently in the North West for units over 9,292 sq. m. The total floor area requirement is between 1.043m<sup>2</sup> to 1.341m<sup>2</sup>. The requirements are for a mixture of existing buildings or build to suit.

In addition to the Application Site, there are four additional sites which have or are being considered at Call-In and the JLL evidence confirms there is sufficient demand and a need for a suitable land supply to develop all these sites. In summary, other than those sites already referenced that have been subject to Call-In inquiries, there are no other locations within the Warrington sub-market or M6 corridor that can be developed immediately or if granted consent offer a large-scale development for the logistics sector. In terms of Warrington, there is Omega South, Barley Castle Lane (Eddie Stobart site subject of refusal), and Fiddlers Ferry. With the exception of Barley Castle Lane, Warrington Borough Council does not have any sites capable of providing a large building footprint with reasonable motorway access, other than the Application Site.



6.158. Both our independent assessment and the recent assessment by the Council as part of their evidence based (EDNA – August 2021) to support the Update Local Plan demonstrate that there are no non-Green Belt sites to meet the need. We consider that the lack of alternative (non-Green Belt sites) is a significant material planning consideration in favour of the proposals. We attach **SIGNIFICANT** weight to it.

**Consideration 5 – Whether the Proposed Development is suitable / deliverable**

6.159. Both the EDNA (August 2021) and Submission Draft Local Plan (Sept 2021) endorse our conclusion that the Application Site is the most suitable site to meet the strategic employment needs and also that is deliverable.

6.160. The location of the Application Site is supported by the EDNA (August 2021) which recognises the significant locational advantages of providing greater employment opportunities in the south of the Borough, particularly to meet the locational requirements for strategic B8 users. The EDNA sets out a robust methodology for considering the alternative sites put forward to meet this need. It sets out grading of sites on a sliding scale. It confirms the Application Site as being an A+ which it defines as “site has no large-scale constraints. It is well placed, and of a size, to meet strategic demand and attract inward investment. Site is in developer control, or has other strong indications of deliverability early in the Plan Period”.

6.161. A detailed assessment of the Application Site is included within the EDNA in Table 13 which confirms that:-

- *“Plans for development are well established here. The land is under the control, although not yet ownership, of an experienced developer who is supported by Panattoni, a developer of international experience delivering strategic B2 / B8. The scheme has financial backing for both land acquisition and delivery. An Outline Planning Application has been submitted and while there is no guarantee that this will be approved; it does show an advanced level of planning for both the scheme and associated infrastructure”.*
- *“As noted for R18.061, R18/P2/100 above, stakeholders were clear that with Omega now largely full, South East Warrington is where they expect the new Strategic B2/B8 site for Warrington Borough to be delivered. Its direct motorway access is a key feature, making it more attractive to the market than more isolated sites. More generally the market for larger B2 and particularly B8 premises remains very strong and has only benefitted from the growth*

*of e-commerce in 2020/21. The proposal has already generated some occupier interest and partners see no reason why it cannot be delivered by 2027”.*

- 6.162. The Applicant can confirm that the Application Site is fully funded and is available for immediate development once planning permission is granted. It fully meets the locational requirements of B8/Logistics operators. It 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. It is also midway between Liverpool and Manchester and within 10 miles of Manchester Airport and presents an excellent opportunity to become a major Northwest logistics location.
- 6.163. As has been noted in respect of ‘consideration 2’, the Applicant commissioned a report from Model Logic which re-affirmed that the Application Site ranks highly when compared to other sites and locations and that it has an excellent catchment area and hence is a prime location for a regional distribution centre and also for “last-mile” distribution.
- 6.164. New warehouse and distribution sites should be able to accommodate large regional and national production/distribution facilities of a minimum of 5-10 ha in size and equally be able to accommodate the very largest logistic operators who potentially require sites above 43 ha in size (gross). The Application Site will provide 64.74 ha of employment land and can accommodate a range of distribution facilities of 5 to 10 ha in size and would also be able to accommodate a single operator wanting a site above 43 hectares in size. The Site has the potential to deliver approx. 3 million sq. ft. of high quality logistics floor space and become a major employment site for the Borough of Warrington, replicating the success of the Omega site to the north of the Borough.
- 6.165. The Application Site will have direct and convenient access to the motorway which will be facilitated by the highway works being proposed to Grappenhall Lane (B5356) as well as mitigation works to the A50/Cliff Lane roundabout and Junction 20 of the M6 Motorway. The location of the Site also has the benefit of ensuring that freight traffic would be directed away from any sensitive receptors such as residential properties and away from the local highway network.
- 6.166. The Application Site is flat and expansive with no overriding topographic constraints and is capable providing large and level plots suitable for large footprint B8 uses. A detailed

constraints and opportunities exercise has been carried out to confirm that the development cells can be delivered.

- 6.167. The Application Site is accessible to the supporting supply chain and it will be close to an established employment area and an area of population growth through the expansion of south Warrington proposed in the Submission draft Local Plan. The Site's proximity to a suitable population centre is important from a labour force perspective with some of the largest logistics facilities requiring over 3,000 warehouse staff to run efficiently in various shift patterns.
- 6.168. The Site 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.
- 6.169. We consider that the suitability and deliverability of the Application Site is a significant material planning consideration in favour of the proposals. We attach **SIGNIFICANT** weight to it.

#### **Consideration 6 – The employment created by the Proposed Development**

- 6.170. As set out in the Socio-Economic Addendum Technical Report 6 that forms part of the ES Part 2, the Application Proposals will have a significant positive economic benefit to Warrington.
- 6.171. Through the redevelopment of the Application Site for new B8 floorspace, the Proposed Development will create 1,762 person years of construction employment (the equivalent of 271 jobs being supported over a 6.5-year construction period). Further jobs will be created during the construction phase due to supply chain expenditure and workers on the development spending money in local shops and facilities. The overall economic impact of the construction phase is estimated to be approximately £11 million per annum.
- 6.172. Other impacts during the construction phase will include the provision of new training and apprenticeship opportunities. It is envisaged that the construction phase could provide the opportunity for at least 180 new trainee placements. In addition, the construction phase will provide employment opportunities for residents living in deprived communities. Based on employment construction contracts data from Omega, the Proposed Development could

create around 100 job vacancies for local unemployed people during the construction phase.

- 6.173. There is the potential for adverse impacts as a result of the proposed construction works, including increased demand for local services and facilities and the disruption to local residents and businesses. However, the scale of these adverse impacts is not expected to be significant. It is unlikely that the construction phase will result in many new people moving into the area, thereby limiting the additional demand placed on services such as Primary and Secondary schools and GP surgeries. A Framework Construction Environmental Management Plan will also be put in place to limit any disturbances caused during the construction phase.
- 6.174. After the development has been completed, it is estimated that 4,113 jobs could be created on-site through the attraction of new businesses from the logistics sector, along with further new employment opportunities in the local economy due to additional economic activity being generated off-site. In total, once the Application Site has been fully occupied, it is estimated that the economic impact of the Application Proposals will be around £210 million per annum. In addition, the Proposed Development will lead to an increase in business rates within Warrington, estimated to be approximately £7.1 million per annum.
- 6.175. A key principle of the Application Proposals will continue to be that the benefits to local people are maximised. This will involve work with local partners to raise the awareness of future opportunities and equip local people with the necessary skills to access the new jobs that will be created by virtue of the Proposed Development. Discussions have been held with Warrington and Co. and Cheshire and Warrington LEP in relation to raising the awareness of future opportunities and the methods through which local people can best be engaged, particularly those in areas suffering from deprivation and higher levels of unemployed.
- 6.176. Due to the nature of the employment created, the Proposed Development will offer accessible route ways into work for those who are currently unemployed. Roles within the logistics sector are recognised as being accessible to those with low skills but with the real possibility to start at a lower level and 'work their way up'. At the same time, technological change within the logistics sector is driving a requirement for more complex work roles and a greater need for specialised technical skills, generating demand for a range of roles including operations managers, engineers and HR and IT specialists.

- 6.177. More generally, beyond the direct impacts associated with the Proposed Development, the provision of new logistics space will also play an important role in supporting the economic growth of the wider economy of Cheshire and Warrington LEP. The logistics sector is recognised as key enabler of growth in terms of its relationships with other sectors, such as manufacturing and the wider transport sector. Cost-effective and efficient logistic operations have cross-sector benefits, helping to improve the productivity and competitiveness of other businesses in the region. The sector itself is seen as providing an opportunity to drive growth in Warrington and neighbouring areas, with the Borough enjoying a competitive advantage as a result of its location and strong transport links.
- 6.178. We consider that the social and economic benefits of the Application Proposal are significant material planning consideration in favour of the proposals, and we attach **MODERATE** weight to them.

**Consideration 7 – The Training, Skills and Jobs opportunities created by the Proposed Development**

- 6.179. Other impacts during the construction phase will include the provision of new training and apprenticeship opportunities. A common benchmark used in construction frameworks is to assume 52 person-weeks of paid employment for ‘new entrant trainees’ per £1 million in contract value. If 52 weeks is assumed to equate to one full-time equivalent (FTE) training or apprenticeship opportunity, then the Proposed Development will support 180 new trainees over the 6.5 year construction period, based on approximately £180 million of construction expenditure. This would result in an average of approximately 27 new trainees per annum during the construction phase. During the operational phase Langtree PP and Panattoni will look to develop bespoke training schemes to provide young people with apprenticeships, work experience and opportunities for graduates. Langtree PP and Panattoni will engage with organisations such as Warrington & Co., the CITB and Jobcentre Plus to provide these local training and apprenticeship opportunities.
- 6.180. The Proposed Development will offer an accessible route into work for those who are currently unemployed. Based on the skills-mix typically associated with the logistics sector, it is anticipated that close to 70% of jobs provided by the development will be at NVQ level 2 or lower. Consequently, the employment created would match well with the skills profile of the unemployed in Warrington and, in particular, help to provide opportunities to those people with relatively low level skills that suffer from long-term unemployment.

- 6.181. The largest former occupation of long-term unemployed is elementary occupations, which corresponds to the warehouse and storage sector. Roles within the logistics sector are therefore recognised as being accessible to those with low skills but with the real possibility to start at a lower level and ‘work your way up’. Despite the relatively low level skill requirements that have typically been associated with the logistics sector, technological change is driving a requirement for more complex work roles and a greater need for specialised technical skills. Research back in 2014 by the UK Commission for Employment and Skills (UKCES) identified an increasing need for individuals within the logistics sector to be multi-skilled in many areas, including management roles, drivers, port operatives, warehouse operatives, transport office, IT professionals and trainers. This trend has continued, with a recent example being Amazon’s new distribution fulfilment centre at Omega, which generated demand for a range of roles including operations managers, engineers and HR and IT specialists. The growing demand for higher level and a broader range of skills within the logistics sector presents opportunities for improving the pathways to work and career advancement, supporting people into decent, secure and well-paid jobs, and helping to tackle the barriers to both gaining employment and progression to higher wage occupations.
- 6.182. A moderate adjustment to employment numbers of between 10% and 15% may be required for future developments over the next 10 to 15 years to reflect continued investment in automation across the sector, however for the time being, the assessment of gross FTE jobs is still based on the most up-to-date employment density benchmarks published by the former HCA.
- 6.183. Evidence suggests that the occupations with the highest estimated automation potential typically only require basic to low level of education. On this basis, higher skilled activities are likely to be largely retained. The investment in automation could also have a positive effect on employment volume as a larger workforce (e.g. drivers and other staff) is needed to dispatch the greater number of parcels sorted per hour.
- 6.184. We consider that the training, skills and job benefits of the proposal are significant material planning consideration in favour of the proposals, and we attach **MODERATE** weight to them.

#### **Consideration 8 – The investment in to the local economy**

- 6.185. In terms of the overall economic impact of the construction phase, the Proposed Development will involve approximately £180 million of construction related expenditure. This expenditure will support a range of temporary employment opportunities in the local economy. Alongside directly supporting employment through the design and delivery of construction works, the construction phase will also result in supply side (indirect) benefits, including through, for example, the purchase of construction equipment and supplies. In addition, the redevelopment proposals will lead to induced effects through construction employee spend on goods and services within Warrington, the wider surrounding area including Wigan, Halton and St Helens and the Cheshire and Warrington LEP area as a whole. Overall, it is estimated that the Proposed Development would generate net additional GVA of around £74 million within the Cheshire and Warrington LEP area. This would equate to an average of £11.3 million per annum over the 6.5 year construction period.
- 6.186. The Proposed Development would help to stimulate economic growth in the wider local and sub-regional economy and complement development elsewhere, helping to attract additional investment and businesses. For example, the attraction and retention of new businesses has associated consequences in terms of generating additional employment through the supply chain (indirect effects). The direct and indirect effects of new investment also generates additional employee spend on local goods and services, supporting further job creation (induced effects).
- 6.187. It is estimated that the Proposed Development, once fully operational, could generate net additional GVA of around £210 million per annum within the Cheshire and Warrington LEP area. Once fully developed, it is estimated that the Proposed Development will generate approximately £7.1 million of business rates revenue per annum.
- 6.188. The increase in economic activity and investment will have knock-on effects in terms of the local supply chain, as well as supporting the growth of local services and facilities through the attraction of additional expenditure. It is estimated that the Proposed Development, once fully occupied, could generate £122 million of net additional supply chain and employee spend per annum in Warrington. Based on ONS business population data, this would be enough to sustain around 205 local businesses. This will help to encourage further investment, as well as enabling existing businesses to expand, attract new businesses, and retain and create further jobs for local residents.

- 6.189. More generally, beyond the direct impacts associated with the Proposed Development, the provision of new logistics space will also play an important role in supporting the economic growth of the wider economy of Cheshire and Warrington LEP. The logistics sector is recognised as key enabler of growth in terms of its relationships with other sectors, such as manufacturing and the wider transport sector. Cost-effective and efficient logistic operations have cross-sector benefits, helping to improve the productivity and competitiveness of other businesses in the region. The sector itself is seen as providing an opportunity to drive growth in Warrington and neighbouring areas, with the Borough enjoying a competitive advantage as a result of its location and strong transport links.
- 6.190. We consider that the benefits from the investment resulting from the proposal are significant material planning consideration in favour of the proposals, and we attach **MODERATE** weight to them.

**Consideration 9 - Recreational Opportunities created by the Proposed Development**

- 6.191. In addition to the economic impacts that will be created during the operational phase, the Proposed Development will generate a range of important wider socio-economic benefits that are suspected to be sustained for a number of years.
- 6.192. Specific measures are proposed to help integrate the development with its surrounding environment. These include the retention of existing boundary vegetation and enhancing the green edge through bunding and new tree planting. The updated Parameters Plans which set the parameters for future development of the Application Site, include measures that are designed to protect the setting of the scheduled monument (and interpretation boards to improve awareness of the monument) whilst enhancing the surrounding green space. The updated Illustrative Masterplan shows how these measures may be incorporated into the final design. The lowering of estate roads that traverse the the green corridor through this part of the Site combined with the proposed bunding and boundary tree planting will help screen the lower half of the development from view and will increase coverage as the tree planting matures. Recreational opportunities will be incorporated through the retention of the existing public footpath and the incorporation of a new walking route through the wildflower meadow, encompassing the scheduled monument.



- 6.193. We consider that the recreation benefits of the proposal are significant material planning consideration in favour of the proposals, and we attach **MODERATE** weight to them.

**Consideration 10: Environmental – woodland; biodiversity; habitat**

- 6.194. The Proposed Development will deliver a new ecological mitigation area in the south eastern extent of the Site. It will also safeguard Bradley Gorse Woodland and provide two green wildlife corridors running through the Site.
- 6.195. The ecological mitigation area can accommodate total of seven replacement ponds, based on the principle of 2:1 replacement of GCN breeding ponds, and 1:1 replacement of other ponds to enhance aquatic breeding habitat for Great Crested Newts (GCN).
- 6.196. To raise the provision of new wetland habitat towards a 2:1 replacement of all ponds, a number of the proposed attenuation basins in locations identified on the updated Drainage Parameters Plan can be designed so that they will permanently hold water. Where possible, ponds selected for this treatment will be those closely linked to the proposed Green Infrastructure and Bradley Brook watercourse corridor and will be landscaped to maximise benefits for wildlife. Other attenuation features included across the scheme which are likely to be dry most of the time will be appropriately landscaped to provide a contribution towards additional terrestrial habitat for GCN and other wildlife using the site.
- 6.197. Habitat within the ecological mitigation area will include rough grassland for foraging with hedgerows and scattered scrub for cover and hibernation. It is likely that the existing grassland habitat can mostly be enhanced through an appropriate management regime of periodic cutting, rather than habitat creation. New hedgerow and scattered scrub (throughout the site) will include native species such and those which provide flowers or fruit resources through the year to also provide benefit for other wildlife.
- 6.198. The applicant will commit to a long term management of these areas through the implementation of an Ecological and Landscape Management Plan which will benefit both Site users and the local area. Whilst the proposal will lead to the loss of some habitats of local importance, the ecological mitigation area and the retained habitats on the site, including the

off-site mitigation strategy to mitigate such losses through a financial contribution to an off-site habitat management scheme for wintering birds will provide suitable mitigation for the habitat loss to the protected species. It is considered that the new managed habitats will be beneficial to biodiversity in the longer-term.

- 6.199. Consistent with the requirements of paragraph 175 of the Framework, which states proposals should seek to secure measurable net gains for biodiversity, the applicant has used the Defra metric to provide the baseline position and to ultimately demonstrate that there would be no net loss in biodiversity value within the site as a result of Proposed Development. In summary, the calculator demonstrates an overall net gain in biodiversity on site which complies with paragraph 175 of the Framework.
- 6.200. We consider that the environmental benefits of the proposal provide measurable gains associated with the contribution to an off-site habitat management scheme for wintering birds and areas of the site are either retained or provide newly created habits which ensure there is no net loss in biodiversity. On this basis, there are a significant material planning consideration in favour of the proposals and we attach **MODERATE** weight to them.

#### **Consideration 11: Traffic and Transportation**

- 6.201. Consideration of traffic and transport matters relates to potential impacts arising from movements of vehicles and people within the Site and on the external highway network. The Application Proposals will generate HGV, LGV, public transport and private car movements as well as pedestrian and cycle movements.
- 6.202. It is proposed that the Site will be accessed via two new roundabouts onto Grappenhall Lane with one towards the western extent of the Site and one in a more central location. Minor changes have been made to the realignment of the first access point as you approach from the Cliff Lane roundabout, as illustrated on the updated Access and Circulation Parameters Plan. This is to reflect the alignment of the estate road into the site and has moved c. 45.5m to the east and will alleviate noise impacts on residential properties.
- 6.203. The primary pedestrian and cycle access points into the development will be via the two new roundabouts. A new 3.5m shared pedestrian/cycle route will link the two roundabouts and provide connections to the west and east of the Site and will extend for a distance of circa 1.2km, with a commitment to provide a commuted sum towards continuing this shared

cycleway/footway beyond the Application boundary extending the footway to the Grappenhall Lane / Broad Lane roundabout to provide better pedestrian permeability and connections. This would necessitate an additional 175m of footpath on existing highway land to the south of Grappenhall Lane to continue the pedestrian/cycle infrastructure to the Broad Lane roundabout. The scheme will also involve the retention of a Footpath 31, which runs north to south through the site and the diversion of Footpaths 23 and 28 which currently runs east-west across the Site. The delivery of new pedestrian and cycle infrastructure and upgrades to the existing PROW network, would offer significant benefits over the existing footpaths connections within and adjacent to the Site.

- 6.204. The updated Transport Assessment (TA) that accompanies this Application indicates that, with current infrastructure, the Site is not ideally located to attract trips by non-car modes of transport. However, the updated TA identifies that there are several proposals to enhance the situation, both as part of the future development itself and by benefitting from other infrastructure that is likely to come forward from nearby committed developments and/or the potential future developments set out in the Update Local Plan. The TA states that the infrastructure to be implemented or funded by the Application Proposals includes a new 1.2km shared pedestrian/cycle route along the northern boundary of the Site, PROW improvements, and funding towards new public transport services, including seeking the delivery of a new bus service. A Travel Plan Framework is also provided as part of the planning application which considers how the public transport and non-vehicle measures may be implemented in respect of the site to reduce reliance on the private car.
- 6.205. Based on the results, a comprehensive improvement scheme for the A50 Cliff Lane / B5356 Grappenhall Lane roundabout and the M6 J20 dumbbell roundabouts has been developed by the highway consultant's Curtins. The scheme features the following works:
- Relocation of the A50 Cliff Lane roundabout to the west of its existing location to enhance the storage capacity of the link between the roundabout and the motorway;
  - Full signalisation of the new realigned A50 Cliff Lane roundabout with widening of all approach arms and reduction of the exit arm onto the A50 to one lane;
  - Widening of the A50 link between the A50 Cliff Lane roundabout to provide two lanes for much of the links length;

- Partial signalisation of the two M6 J20 dumbbell roundabouts;
- Widening of the M6 Northbound off-slip;
- Widening of the circulatory carriageway on the two M6 J20 dumbbell roundabouts and rationalisation of the lane markings / directional arrows; implementation of a yellow box and installation of queue detectors; and
- Widening on the eastern approach to the dumbbell roundabouts.

6.206. The capacity assessment result of the proposed improvements indicates that overall the scheme is forecast to result “*in betterment and balancing of traffic queues when compared to the 2021 / 2029 without development / improvement scenarios*”. The Assessment also tested the other local junctions and concluded that the impact of the development is not considered to be severe.

6.207. Both Warrington Borough Council Highway’s Officers and National Highways (formerly Highways England) have now confirmed that they have no highway objections to the Proposed Development, subject to conditions and S106 Agreement.

6.208. We consider that highway impact is an important consideration in this Application owing to the nature of the proposals i.e. Use Class B8 Storage and Distribution. Given that mitigation measures are proposed and that the conclusion is that the Application Proposals can be accommodated on the highway network and deliver a betterment in traffic queues, we consider that the proposals would have a **NEUTRAL** or even **POSITIVE** benefits to the highway network

**Conclusions on whether very special circumstances exist in favour of the proposed development.**

6.209. It is accepted that the Proposed Development is “inappropriate” development within the Green Belt and hence there is substantial “definitional” harm to the Green Belt. It is also accepted that there is harm to the “openness” of the Green Belt and that there is harm to one of the “purposes” of including land within the Green Belt. In accordance with national policy, this Green Belt harm overall carries substantial weight against the Application Proposal.

6.210. We have identified some environmental issues that need to be addressed and mitigated at detailed design stage, some of which are minor adverse effects which need to be balanced against the significant benefits that the scheme will deliver. There is minor harm to landscape, heritage and loss of agricultural land (BMV), but this harm can be largely mitigated through appropriately worded conditions and if required through a Section 106 Agreement.

6.211. In terms of weighing matters in favour of the Application Proposals (“other material considerations”) we conclude:-

- The policy support for employment development within Warrington through the emerging evidence base is a significant material planning consideration in favour of the proposals. We attach **significant** weight to it.
- The need for new employment sites is a significant material planning consideration in favour of the Application Proposals. There is a significant need for the Proposed Development as confirmed by the Warrington EDNA (August 2021); JLL evidence to the Parkside Call-In inquiry; and the Inspector and Secretary of State decisions at Wingates and Symmetry Park. South Warrington has been consistently promoted and recognised by Local Plan evidence as a key strategic location for logistics development. We consider that the need for employment sites is a significant material planning consideration in favour of the Application Proposals. We attach **significant** weight to it.
- There are no alternative sites either outside of the Green Belt or on land in Green Belt that performs better than the Application Site in locational or deliverability terms. We consider that the lack of other alternative sites to meet the need for employment is a significant material planning consideration in favour of the Application Proposals. We attach **significant** weight to them.
- The Site is a suitable and deliverable development site that will form an important part of Warrington’s employment land requirements. We consider that the suitability and deliverability of the Site is a significant material planning consideration in favour of the Application Proposals. We attach **significant** weight to it.

- The Application Proposals will provide a range of significant Economic, Social and Environmental benefits for Warrington and neighbouring authorities and the wider City Region (the ES Socio- Economic Technical Paper and its Addendum). We attach **significant** weight to them.
- We consider that the economic and social benefits of the Application Proposal are a significant material planning consideration in favour of the proposals. We attach **significant** weight to them.
- We consider that highway impact is an important consideration in this Application owing to the nature of the proposals i.e. Use Class B8 Storage and Distribution. Given that mitigation measures are proposed and that the conclusion is that the Application Proposals can be accommodated on the highway network and deliver a betterment in traffic queues, with improvement, we attach **moderate** weight to these benefits.
- We consider that the environmental benefits of the Application Proposal are a significant material planning consideration in favour of the application proposals. We attach **moderate** weight to these benefits.

6.212. In light of the above, we conclude that the substantial harm to Green Belt by reason of inappropriateness and the limited harm to openness and one purpose of the Green Belt, along with the other harm identified arising from the Proposed Development would be clearly outweighed by the above identified benefits of the Application Proposal which when taken together constitute ‘very special circumstances’. In line with paragraph 148 of the NPPF (21), “very special circumstances” have been shown to support the Application Proposals.

## II) National Policy on the Historic Environment

6.213. The ES Technical Paper 9 and its Addendum identifies that there are a number of designated and non-designated heritage assets within close proximity of the Application Site which are recorded on the Cheshire Historic Environment Record. Four of these are recorded within the site including Bradley Hall Moat, which is classed as a Scheduled Monument. At the heart of this is the locally listed Bradley Hall and associated barn.

- 6.214. The NPPF requires proper consideration of the impacts on heritage assets and where there is any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), this should require ‘*clear and convincing justification*’ (Paragraph 200). If the harm is considered to be substantial then in respect of listed buildings this should be exceptional and in terms of Scheduled Monuments, this should be wholly exceptional. However, where it is concluded that the harm is less than substantial then it is necessary to identify those public benefits that outweigh that harm.
- 6.215. In the case of non-designated heritage assets, the NPPF (21) states “*the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*” (Paragraph 203 of the NPPF (21)).
- 6.216. The NPPF (21) seeks to protect heritage assets from harm. Paragraph 194 seeks to ensure that proper consideration is given to the heritage asset including assessing its significance and undertaking both desk and field-based work. This has been undertaken on behalf of the applicant with a particular focus on the Scheduled Monument. The assessment is included as part of the ES Technical Paper 9 and its Addendum. Other heritage assets are also identified and an assessment is made.
- 6.217. In preparation of this planning application, Historic England (HE) was consulted in May 2017 in March 2018 relating to the ES Scoping and more recently in Autumn 2019 regarding the updated Illustrative Masterplan and the impact realignment of estate roads have on the setting of the SAM. HE broadly endorsed the approach that was adopted in the scheme in terms of providing a significant landscape buffer around the Scheduled Monument and the retention of the mature trees and vegetation surrounding the moat to maintain its character and protect its setting. However, HE stressed that development within vicinity of Bradley Hall Moat needs particular consideration in terms of physical impact and impacts on its setting and the planning application should be accompanied by a geophysical survey. Any estate road which traverses the green corridor should also be built into the levels of the site and not have street lighting to reduce impacts on the setting of the green corridor and SAM.
- 6.218. The impact that the Proposed Development would have on the designated and non-designated heritage assets is considered in detail within the within the Addendum ES Technical Paper 9 Cultural Heritage and Archaeology and its appendices. This document concluded that:

- *“The resultant effect of the Proposed Scheme on the Grade II\* Listed Tanyard Farm building (113963), Grade II Listed Barley Castle Farmhouse (1329741), Grade II Listed Booth Farm House (1329740) and Shippon (1139362) and Barn at Manor House (DCH1934) will be Minor Adverse due the impact on setting. However, it is recognised that landscape mitigation will to some degree alleviate this” (Para 9.8).*
- *“The extent of harm to the heritage value of the Scheduled Monument is considered to be less than substantial” (para 11.4).*
- *Other than Mitigation by design a programme of archaeological evaluation and mitigation will be undertaken to further investigate the Roman road and the site of the medieval cross. A number of the anomalies identified by the geophysical survey will also be assessed in line with NPPF (19) and Local Plan Policies. In addition to this archaeological recording of Bradley Hall and barn prior to any alterations will be undertaken. A number of the farm buildings to be demolished will also be recorded. These works will be discussed and agreed with Mr. Mark Leah (Historic England) and will be undertaken prior to all groundworks. The resultant impact on the archaeological resource will be negligible” (para 11.6).*

6.219. Since we have concluded (in line with the evidence) that the harm is “less than substantial” then in accordance with paragraph 202 of NPPF (21) we now consider the public benefits accruing from the application proposal and whether they outweigh that harm.

#### **Public Benefits**

6.220. Section 6 of this Replacement Planning Statement sets out needs for the development; the policy support for it; and the significant economic, social and environmental benefits of the application proposals. The “Benefits” set out within section 6 of this Replacement Planning Statement equate to the “Public Benefits” required within the context of paragraph 202 of the NPPF (21). We do not propose to restate these “Benefits” here (as they can be read in full in Section 6 of the Replacement Planning Statement) but we confirm that we consider that each of the “Benefits” assessed in Section 6 are “Public Benefits” for the purposes of the heritage assessment. We ascribe weight to each of the “Public Benefits” within Section 6, and hence we consider that there are significant “Public Benefits” to the Application Proposals.

#### **Conclusions on Heritage Policy Considerations**



- 6.221. In drawing together these “Public Benefits” we have reached the conclusion that the “less that substantial harm” to the heritage assets is outweighed by these “Public Benefits” and hence that the requirements of paragraph 202 of NPPF (21) is met.

### **III) Overall Compliance with National Planning Policy**

- 6.222. As demonstrated in the above sections, the Proposed Development is consistent with the NPPF (21).
- 6.223. At the heart of the NPPF is the presumption in favour of sustainable development. Paragraph 8 of the NPPF (21) explains that there are three dimensions to sustainable development, which are economic, social and environmental. The paragraph goes onto state that these three objectives are interdependent and need to be supported in mutually supportive ways.
- 6.224. As outlined earlier in this section, the Proposed Development will deliver significant benefits across all three aspects of sustainability. Therefore, the application proposals accord with the requirements in the NPPF (21) and constitutes sustainable development.

## B) Compliance with the Warrington Local Plan Core Strategy (July 2014)

- 6.225. The Local Plan Core Strategy (CS) replaced the previously adopted Unitary Development Plan. The CS sets out a planning framework for guiding the distribution and scale of development in the borough up to 2027. Both the CS and its predecessor (the UDP) sought to halt the outward growth of the town and instead focus on regenerating and restructuring the older core of Warrington town.
- 6.226. The CS recognises that Warrington has strong and resilient economy. It also claims that the current land take-up is good, and the borough has a strong and diverse land and premises offer. Nevertheless, it acknowledges that there are areas in Warrington which suffer from high levels of deprivation and worklessness and have not benefited equally from the prosperity within the borough.
- 6.227. The Key diagram on Page 21 of the CS identifies the Application Site as being within the Green Belt but also identifies Barleycastle and Stretton Green Trading Estates as being preferred distribution locations.
- 6.228. The CS sets out the 2027 Vision for the borough, which states that the “*town continues to be a key economic driver for the surrounding area*” and that “*the town has grown by strengthening its existing neighbourhoods especially in areas around the town centre and that the focus on regeneration has limited outward growth of the town and is unable to continued protection of the Green Belt.*” The Proposed Development would support this Vision by contributing significantly to the economic growth of the borough as well as tackling issues of deprivation and worklessness. As set out in the Framework Travel Plan a number of interventions are proposed to improve accessibility to the site for local residents such as new bus services as well as pedestrian and cycle links. Nevertheless, it is acknowledged that the Application Proposal would conflict with a blanket protection of Green Belt.
- 6.229. The 2027 Vision goes on to state that “*the borough is home to a highly skilled workforce that serves global economy well and the town continues to be a focus for employment for wide area – reinforced by the development of significant sites in and immediately surrounding the borough.*” The Proposed Development would support 1,762-person years of construction employment (the equivalent of 271 jobs being supported over a 6.5 year construction period). Once operational, the Proposed Development will create in the region of 4,113 FTE jobs. Research

by the UK Commission for Employment and Skills identifies an increasing need for individuals in the logistics sector to be multi-skilled in many areas, including management roles, drivers, part operatives, warehouse operatives, transport office, IT professionals and trainers. The Vision also appears to recognise the need to bring forward significant employment sites within the borough during the plan. Therefore, it is considered that the Application Proposal fully complies with this element of the Vision.

- 6.230. **Policy CS1** sets out some general principles to which new development must have regard. Not unsurprisingly given the date of the adoption of the Core Strategy, Policy CS1 is based on approach set out in the previous draft of the National Planning Policy Framework published in 2012, in particular paragraph 14. However there are now elements of Policy CS1 which are no longer consistent with the new approach set on in paragraph 11 of the NPPF (21) in particular the reference to “relevant policies are out of date”, which has now been replaced by a new test of “most important [policies] for determining the application are out of date”. Therefore there is now a requirement to consider whether [any of] of the policies which are most important for the determining the application are out of date. The NPPF (21) paragraph 219 makes clear that due weight should be given to policies that are made or adopted prior to the publication of the latest NPPF (21) according to the degree of consistency with this Framework.
- 6.231. Nevertheless, the fundamental premise of Policy CS1 that proposals that accord with the development plan should be approved without delay is consistent with NPPF (21). It will be shown later within this Section of this Replacement Planning Statement that the Proposed Development accords with the development plan and therefore constitutes ‘sustainable development’ and as a result planning permission should be granted without delay.
- 6.232. **Policy CS2** stipulates that the main focus for other business, general industrial and storage/distribution development (B1/B2/B8) will continue to be the existing employment areas of the town principally Birchwood Park, Gemini and Winwick Quay, together with further sites at Woolston Grange and the strategic location of Omega and Lingley Mere. It also states that within the Green Belt area, development will only be allowed where it is considered to be appropriate in accordance with National Policy. Nevertheless, the policy also highlights that major warehousing and distribution developments will be located away from areas sensitive to heavy vehicle movements, with direct access to the primary road network, where possible with access to rail and/or the Ship Canal.

- 6.233. The planning application is seeking permission for a major warehousing and distribution development (B8 with ancillary BI (a)) on land adjacent to the Barleycastle and Stretton Green Trading Estates. The Application Site and has direct access onto the primary network and is not in an area sensitive to heavy vehicle movements. Therefore, the proposal accords with the main locational requirements of Policy CS2. Whilst the proposal would not constitute ‘appropriate development’ in accordance with the NPPF (paragraph 147), it is considered that there are very special circumstances for allowing the Proposed Development in accordance with Paragraph 148 of the NPPF, which are set out in this Planning Statement. Therefore, it is considered that Application Proposal does not conflict with the broad thrust of Policy CS2.
- 6.234. The Application Proposal conforms with **Policy CS4** which requires development to be located in in areas where there is an opportunity to reduce travel especially by car as well as enable people as far as possible to meet needs locally. A Framework Travel Plan accompanies this Application, which seeks to minimise the level of traffic associated with staff trips, single occupancy trips and to promote sustainable modes of travel. Measures detailed in the Travel Plan and those set out below will help to mitigate the impacts of the traffic associated with the development proposals.
- More than 1.2km of new pedestrian/cycle infrastructure will be provided on Grappenhall Lane to the north of the development;
  - Significant upgrades are proposed to the existing Public Right of Way network that exists within the Site; and
  - Funding for new Public Transport services will be provided, including the provision of new infrastructure within the site itself.
- 6.235. The supporting text to **Policy CS5** states that the integrity of the Green Belt is to be preserved across the entirety of the plan period and beyond. It also states that the “*Council will maintain the general extent of the Green Belt*”. The policy considers that there are sufficient contingencies in place within the Local Plan Core Strategy to ensure that the protection of Green Belt is sustainable in the long-term and therefore there is no need to review the Green Belt during the plan period. It stresses that this approach does not compromise growth aspirations during or beyond the plan period. However, it does go on to say that development proposals within the Green Belt will be approved where they accord with relevant national policy.

- 6.236. The evidence underpinning **Policy CS5** has clearly been superseded by more recent evidence that demonstrates that land is required to be released from the Green Belt to meet the housing and employment needs of the borough, therefore elements of this policy referencing the Green Belt boundaries are out-of-date and hence we apply limited weight to these aspects of the policy. Nonetheless, the Application Proposal complies with Policy CS5 as we demonstrate in this Replacement Planning Statement that there are “very special circumstances” to justify the Proposed Development within the Green Belt and hence it is in line with national Green Belt policy.
- 6.237. **Policy PVI** states that subject to assessment of local transport impacts, major warehousing and distribution developments will be primarily directed towards preferred locations at Appleton and Stretton Trading Estates, Omega and Woolston Grange. It goes on to state that where major warehousing and distribution developments are proposed outside of these areas, proposals should seek to locate development away from areas sensitive to heavy vehicle movement and with direct access to the primary road network and preferably with access to rail or the Ship Canal where possible. Finally, it states sustainable development creating employment in other areas of the borough will also be supported. The policy clearly allows major warehousing and distribution developments to come forward outside the existing employment areas subject to meeting the locational requirements of the policy. The Application Site clearly meets the locational requirements of Policy PVI and therefore does not conflict with the requirements of this policy.
- 6.238. **Policy PV3.** The Socio-Economic Technical Paper 6 of the ES clearly sets out how the Proposed Development would strengthen the borough’s workforce and enhance training opportunities for its residents. Therefore, Application Proposal complies with the requirements of Policy PV3.
- 6.239. **Policy SN6** states that the Council will seek to assist the continued viability and growth of the local economy and support the sustainability of communities by ensuring development proposals support sustainable growth of existing businesses, amongst other things. As outlined in this Replacement Planning Statement, the large logistics occupiers are now struggling to find open ready sites to accommodate their expansion within Warrington and Cheshire and that the 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. Furthermore, as identified within the Northern Powerhouse IER, the logistics industry is a key

enabler within the wider economy in terms of supporting the growth of other industries. Therefore, the Application Proposal does not conflict with the requirements of Policy SN6.

- 6.240. **Policy SN7** seeks to reduce health inequalities within the borough by supporting proposals that promote healthy lifestyles. The Application Proposal involves the provision of more than 1.2km of new pedestrian/cycle infrastructure and significant upgrades to the existing Public Right of Way network that exists within the Site as well as the provision of significant new areas of green infrastructure. Therefore, the Application Proposal does not conflict with the requirements of Policy SN7.
- 6.241. Energy Technical Paper 12 of the ES Part 2 sets out how the Application Proposal complies with the requirements of Policy QE1 in regard to maximising renewable and low carbon energy. However, these detailed matters will be dealt with at the reserved matters stages in the consideration of the detailed design of the warehouses. Therefore, the Application Proposal does not conflict with the requirements of **Policy QE1**.
- 6.242. **Policy QE3** seeks to support the provision of well managed Green Infrastructure. The Application Proposals have been carefully designed to incorporate areas of soft and hard landscaping. Strategic landscaping will be provided around the boundaries of the Site including the retention and enhancement of the existing woodland blocks, trees and vegetation on the outer site boundaries. In addition, new woodland belts will be introduced along the Site boundaries and internal roads. Bradley Gorse and Wright Covert in the south eastern extent of the Site are to be retained, as are the trees within and around the Bradley Hall moated site to the centre of the Application Site. A green corridor will be provided from north to south to retain an open corridor around the Bradley Hall moated site and through the Site. A 15m stand-off from built development will be retained to Bradley Brook, which runs east to west along the southern boundary of the Site. As such, the Proposed Development includes a significant amount of Green Infrastructure and therefore the Application Proposal does not conflict with the requirements of Policy QE3.
- 6.243. **Policy QE 4** seeks to ensure that issues of flood risk are fully assessed. The planning application includes a Flood Risk Assessment that identifies that the Site lies within Flood Zone 1. Equally, the Application Proposal is an appropriate distance away and height above Bradley Brook to ensure there is no risk of surface water flooding. These issues are dealt within in detail within the accompanying Flood Risk & Drainage Technical Paper 3 in the ES Part 2. Therefore, the Application Proposal does not conflict with the requirements of Policy QE4.

- 6.244. **Policies QE5 and QE6** seek to protect sites of Biodiversity and Geodiversity value and states that “the Council will only support development which will not lead to an adverse impact on the environment or amenity of future occupiers or those currently occupying adjoining or nearby properties or does not have an unacceptable impact on the surrounding area.”
- 6.245. The Ecology and Nature Conservation ES Technical Paper 5 and its Addendum of the ES Part 2 includes an Ecological Impact Assessment which assesses the potential impact of the Application Proposal on the ecology and nature conservation interests on the Site and in the surrounding area. It concludes that there no statutory and non-statutory conservation designated sites within a reasonable distance of the Site. In addition, a suite of ecological surveys was also carried out which identifies that a number of protected species are potentially present on the Site. However, the reports conclude that habitat loss can be mitigated through the provision of an ecological mitigation area approximately 9 ha in area that will contain a mixture of grassland and scrub mosaic and seven ponds.
- 6.246. Loss of farmland habitat which is suitable for breeding skylark and overwintering birds such as lapwing and starling cannot be mitigated entirely within the scheme boundary. It is proposed that mitigation for such losses will be provided as a financial contribution to an off-site habitat management scheme as outlined earlier in this Replacement Planning Statement. The off-site mitigation will be located within the local area (within WBC area) and discussions are at an advanced stage with Mersey Gateway Environmental Trust regarding a site at Upper Moss Side, Warrington. The exact details of the proposal is currently being agreed with WBC (and their statutory consultee GMEU) at the time of writing this Replacement Planning Statement and can be secured via a Section 106 Agreement.
- 6.247. Careful consideration has been given to the potential impact on residential amenity and the environment. Noise and Air Quality Assessments have been submitted as part of the Application Proposal alongside Technical Papers 7 and its Addendum and 8 on these subjects within the ES as well as a the updated Light Spill Assessment in Appendix 16 of the ES Second Addendum. These assessments indicated that through appropriate mitigation and subject to further assessment at detailed design stage, the potential impacts on the environment and the amenity of nearby residential properties can be sufficiently mitigated both during the construction and operation stages of the development. Therefore, the Application Proposal does not conflict with the requirements of **Policies QE5 and QE6**.

- 6.248. **Policy QE7** states that the Council will look positively upon proposals that are sustainable, durable, adaptable and energy efficient; create inclusive, accessible and safe environments; function well in relation to existing patterns of movement and activity; and, amongst other things, are visually attractive as a result of good architecture and the inclusion of appropriate public space. The details of the proposed materials and building design will ultimately be controlled via planning conditions and future reserved matters applications. However, the Illustrative Masterplan and associated Parameter Plans identify that the Application Proposal will result in a high-quality scheme that will deliver a significant public open space benefit. Therefore, the Application Proposal does not conflict with the requirements of Policies QE7.
- 6.249. **Policy QE8** seeks to ensure that the fabric and setting of heritage assets are appropriately protected and enhanced in accordance with the principles set out in National Planning Policy.
- 6.250. A number of designated and non-designated have been identified within the study area which are recorded on the Cheshire Historic Environment Record. Four of these are recorded within the site including Bradley Hall Moat which is classed as a Scheduled Monument. At the heart of this is the locally listed Bradley Hall and associated barn. Immediately to the north of the Scheduled Monument is the course of a Roman Road. The impact on of the Proposed Development on these heritage assets is considered in the Cultural Heritage ES Technical Paper and its Addendum and the Heritage Impact Assessment appended to the Paper in Appendix 2, which considers that the harm to the heritage assets to be 'less than substantial' and therefore in accordance with Paragraph 202 of the NPPF, this harm should be weighed against the public benefits of the proposal, which are substantial. Therefore, the proposal does not conflict with the requirements of Policies QE8.
- 6.251. **Policies MPI, MP3, and MP4 and MP7** seek to reduce the need for the use of private vehicles and seeks to encourage walking and cycling and the use of public transport, especially providing linkages between residential and employment areas. They also require all developments to demonstrate that they will not significantly harm highway safety and efficiency. In the case of major development, the planning application should be accompanied by Transport Assessment and Travel Plan.
- 6.252. In respect to accessibility, a footway and cycleway is proposed along the length of the Site's northern boundary and frontage with the B5356 Grappenhall Lane. In addition, suitable pedestrian and cycle provision will be provided within the internal site layout as part of the development of a detailed scheme layout. It is also envisaged that the Application Proposal



will provide new bus infrastructure and funding for a new or enhanced service to connect the logistics site with the existing parts of the urban area.

- 6.253. The Proposed Development includes a number of highway works that will mitigate the impacts of the Proposed Development on the local and strategic highway network. The Planning Application is accompanied by a Full Transport Assessment and Travel Plan Framework, which provides further details in respect to the proposed accessibility and highway measures. Therefore, the Application Proposal does not conflict with the requirements of Policies MPI, MP3, and MP4 and MP7.
- 6.254. **Policy MP5** highlights that proposals for freight related development will be supported where they achieve a reduction in road traffic kilometres through their location and/or where they reduce the impact of freight traffic on local or inappropriate routes. The Application Proposal is located with convenient access to Junction 20 of the M6 and therefore any freight traffic would be directed away from local and residential roads. Furthermore, the Application Proposal involves a number of highway works that will improve the local highway network and improve capacity between the Site and Junction 20. Therefore, the Application Proposal does not conflict with the requirements of Policy MP5.
- 6.255. **Policy CC2** seeks control of development in the countryside and states that proposals in the countryside which accord with Green Belt policies set out in national planning policy will be supported provided that; the detailed siting and design of the development relates satisfactorily to its rural setting, in terms of its scale, layout and use of materials; they respect local landscape character, both in terms of immediate impact, or from distant views; unobtrusive provision can be made for any associated servicing and parking facilities or plant, equipment and storage; they relate to local enterprise and farm diversification; and it can be demonstrated that there would be no detrimental impact on agricultural interests. The Landscape and Visual Impact Second Addendum Technical Paper 4 of the ES Part 2 identifies that whilst every effort has been taken to mitigate for adverse landscape and visual effects, for any development of this scale and density adverse significant adverse landscape and visual effects occur.
- 6.256. ES Part 2 – Agricultural Land & Soils Technical Paper 13 of the ES identifies that there will be some loss of some ‘best and most versatile’ agricultural land. Therefore, the Application Proposal is not entirely consistent with the requirements of Policy CC2, which has been

drafted on the premise that no significant development needs will be met within the countryside/Green Belt during the CS plan period.

- 6.257. Nevertheless, Policy CC2 does not wholly reflect the approach within section 6 (Supporting a prosperous rural economy) of the NPPF (21). The NPPF (21) does not seek to limit development to those that solely relate to ‘local enterprise and farm diversification’, but instead also allows the sustainable growth and expansion of all types of business, sustainable rural tourism and leisure developments, and accessible local services and community facilities. It is also not consistent with paragraph 83 of the NPPF (21), which makes clear that planning policies should recognise the specific locational requirements of different sectors including those for storage and distribution. Therefore, it is considered that bullet point 4 of Policy CC 2 is not consistent with the NPPF (21) and therefore limited weight can be attached to this part of the policy.
- 6.258. The Proposed Development is generally consistent with the requirements of Policy CC2, though it is recognised that there will be some limited non-compliance in respect of detrimental impact on agricultural interests and that the Application Proposal does not relate to a local enterprise and farm diversification. However it considered that only limited weight can be attached to these part of the policy because they are not consistent with the NPPF (21).
- 6.259. It is considered that the Application Proposals accord with the relevant policies of the Core Strategy other than in respect of some elements of CS Policies CS5 and CC2. However, both policies support proposals that accord with national policies on Green Belt i.e. where very special circumstances are demonstrated and therefore any conflict is relatively minor. We therefore consider that when taken as a whole, the Application Proposals accord with the Core Strategy.

### **Appleton Parish Thorn Ward Neighbourhood Development Plan to 2027 (Amended Version to February 2017)**

- 6.260. The Appleton Parish Thorn Ward Neighbourhood Development Plan (NP) was adopted in 2017. It stated aim is to “influence considered, sympathetic growth while also protecting our environment” and “ensure development meets the needs of the local community and the environment around is protected and where possible, enhanced.” The Application Proposal has been designed to protect the amenity of the residents of Appleton Thorn as it would seek to ensure that

freight traffic is directed away from the village. Furthermore, the planning application is accompanied by a full ES which contains a suite of studies and surveys, which demonstrate that the Application Proposal would not have an unacceptable impact on the environment.

- 6.261. It is noted that the objectives of NP include ensuring that all traffic and transport issues are addressed especially in respect to safety, speed and congestion (6) and to support services and other businesses providing employment opportunities (8). The Application Proposal is accompanied by a Transport Assessment that addresses the traffic and transport issues raised in the objectives. It is welcomed that the NP seeks to support business.
- 6.262. **Policy AT-D1** states that new development within the area will be permitted where it makes a positive contribution to the distinctive character of the area and be of good quality design. It goes on to set out a number of measures that proposals should take account of which includes local distinctiveness, setting of heritage assets, landscape design, sustainable drainage systems, appropriate lighting etc. We can confirm that these issues where relevant have been taken in to account in the formulation of the Application Proposal and addressed in the ES. Therefore, the application Proposal does not conflict with the requirements of Policy AT-D1.
- 6.263. **Policy AT-D2** states that development will be required to incorporate a number of landscape design principles. These measures have been considered within the landscape design and where possible reflected in the Green Infrastructure Parameters Plan (Ref: I6-184-PI11) i.e. preserving the character of farmsteads and historic buildings, enhancing local habitats and wildlife corridors, conserving important landscape features where possible, avoiding whenever possible the siting of development in highly visible and intrusive positions and conserving traditional farm buildings. Therefore, the Application Proposal does not conflict with the requirements of Policy AT-D2.
- 6.264. **Policy AT-D3** sets out the preferred approach to flood risk, water management and surface water runoff. As explained in the accompanying Flood Risk Assessment, the Application Site is located within Flood Zone 1 and therefore has a low risk of pluvial flooding. These issues are dealt with in detail within the accompanying Flood Risk & Drainage Technical Paper 3 in the ES Part 2. Therefore, the Application Proposal does not conflict with the requirements of Policy AT-D3.
- 6.265. **Policies AT-TH1 and AT-TH2** states that developer contributions where appropriate, will be sought towards the highway improvement schemes to promote the safety of pedestrians

and cycle users; traffic calming measures, pedestrian priority schemes and the reduction in traffic speeds on routes through the village centre; and increasing public and community transport. In addition, proposals should, where appropriate, make provision for sustainable transport measures. As detailed within the accompanying Framework Travel Plan, the Proposed Development will be providing a number of these measures, including cycleways, enhanced pedestrian routes, and extended bus services to serve the Proposed Development. Therefore, the Application Proposal does not conflict with the requirements of Policies AT-TH1 and AT-TH2.

- 6.266. **Policy AT-E1** states that development will be permitted where the option for conversion has been considered and is of a scale appropriate to the area. In addition, the policy also requires that development should not have a detrimental impact on surrounding residential character and amenity, should not lead to loss of open space or green infrastructure, and the development should have a good connection to the highway network and is acceptable in terms of highway safety and parking.
- 6.267. The Site is located adjacent to the Barleycastle Trading Estate which the Core Strategy recognises as an appropriate location for warehouse and distribution uses and is an area where large industrial buildings are already present. The Application Site is strategically located close to the M56/M6 Junction and would deliver significant improvements to the local and strategic highway network. There are no buildings that are capable of conversion that would meet the space requirements of the Proposed Development in whole or part in Appleton Thorn or the wider Borough. Furthermore, the suite of documents contained within the ES demonstrates that the Application Proposal would not have a significant adverse impact on surrounding residential character and amenity. Therefore, the Application Proposal is compliant with the requirements of Policy AT-E1.
- 6.268. The Neighbourhood Plan recognises within paragraph 6.1.4 that the Council is unable to identify sufficient land to meet its likely housing need in accordance with the NPPF and hence that “The Council will need to undertake a more fundamental review of the Plan ....to enable the Council to assess the options for and implications of meeting its housing needs in full”. This paragraph was inserted in response to the Examiners conclusions and hence shows that the Neighbourhood Plan was “made” within a context of reduced development requirements within Warrington and on the understanding that such requirements could be significantly increased. This is clear recognition that the Neighbourhood Plan was “made” at a point in

time where the full objectively assessed needs were not fully determined and hence that should these needs require further sites to be accommodated then the Neighbourhood Plan would become out of date and need to be reviewed. This inherent recognition within the Neighbourhood Plan of the evolving strategic development needs provides an appropriate context for the detailed policies of the Neighbourhood Plan and hence we therefore consider that when taken as a whole, the Application Proposals accord with the Neighbourhood Plan.

### Conclusion on compliance with the Development Plan

6.269. With regards to compliance with the Development Plan, it is considered that whilst there is a need to assess compliance with individual policies, as set out at the start of this section, case law identifies that the test of compliance should be in the context of whether the Application Proposals are in accordance with the development plan “as a whole”. The Judgement (CO/774/2015 EWHC 2489 (Admin) (2015)) sets out in paragraph 30 the basis on which a decision maker may consider the issue, stating “*that is not just in relation to one policy but against the development plan as a whole*”. This is reconfirmed in paragraph 31 “*to determine whether a proposal is in accordance with the plan the decision maker needs to have regard to all of the relevant policies and not just one*”. Furthermore given the age of the Core Strategy, paragraphs 218 and 219 of the NPPF (21) apply and the weight that should be afforded to the policies in each of these components of the Statutory Development Plan is dependent on their degree of consistency with the NPPF (21).

6.270. We have considered the compliance of the Proposed Development with the Policy requirements of the Core Strategy and conclude that the Application Proposal is compliant with the Core Strategy as a whole. The table below summaries the Proposed Development compliance with the most relevant Local Plan Core strategy policies:

Most Relevant Policies in Core Strategy	Proposed Development Compliance with Policy
Policy CSI - Overall Spatial Strategy - Delivering Sustainable Development	Fully Comply
Policy CS 2 - Overall Spatial Strategy - Quantity and Distribution of Development	Fully Comply
Policy CS 4 - Overall Spatial Strategy – Transport	Fully Comply

Most Relevant Policies in Core Strategy	Proposed Development Compliance with Policy
Policy CS 5 Overall Spatial Strategy - Green Belt	Generally Comply. However the part of the policy that the proposal conflicts with does not accord with the NPPF (21). Therefore it is considered limited weight can be given to this conflict with this part of the policy.
Policy CS6 Overall Spatial Strategy – Strategic Green Links	Fully Comply
Policy PV 1 Development in Existing Employment Areas	Fully Comply
Policy PV 3 Strengthening the Borough's Workforce	Fully Comply
Policy PV 4 Retail Development within the Town Centre and Primary Shopping Area	Fully Comply
Policy PV 5 Enhancing the Town Centre Economy	Fully Comply.
Policy SN 4 Hierarchy of Centres	Fully Comply
Policy SN 5 New Retail and Leisure Development Within Defined Centres	Fully comply
Policy SN 7 Enhancing Health and Well-being	Fully comply
Policy QE 1 Decentralised Energy Networks and Low Carbon Development	Fully comply.
Policy QE 3 Green Infrastructure	Fully comply
Policy QE 4 Flood Risk	Fully comply
Policy QE 5 Biodiversity and Geodiversity	Fully comply
Policy QE 6 Environment and Amenity Protection	Fully comply
Policy QE 7 Ensuring a High Quality Place	Fully comply.
Policy QE 8 Historic Environment	Fully comply.
Policy MP 1 General Transport Principles	Fully comply
Policy MP 3 Active Travel	Fully comply
Policy MP 4 Public Transport	Fully comply
Policy MP 5 Freight Transport	Fully comply.
Policy MP 7 Transport Assessments and Travel Plans	Fully comply

Most Relevant Policies in Core Strategy	Proposed Development Compliance with Policy
Policy CC 2 Protecting the Countryside	Partial compliance. However the part of the policy that the proposal conflicts with does not accord with the NPPF (21). Therefore it is considered limited weight can be given to this conflict with this part of the policy.

6.271. Whilst the Site is in Green Belt, the policies state that development proposals within the Green Belt will be approved / supported where they accord with national policy i.e. for ‘appropriate development’ or where ‘very special circumstances’ are demonstrated for ‘inappropriate’ development. We have set out the case for ‘very special circumstances’ in the Replacement Planning Statement and concluded that the Proposed Development does indeed meet this test. As indicated above, when taken as a whole, the Application Proposals will deliver economic development in a sustainable location which is the principle tenet that underpins the Core Strategy.

6.272. It is considered that the Application Proposals provide major warehousing and distribution development in a location already broadly identified as one of the ‘Preferred Distribution Locations’ within the borough (CS Key Diagram) and in a location away from areas sensitive to heavy vehicle movements, with direct access to the primary road network (CS Policy CS2 Overall Spatial Strategy – Quantity and Distribution of Development), and as such this goes to the heart of the development plan approach of supporting the growth of the local and sub-regional economy.

6.273. We have considered the compliance of the Proposed Development with the Policy requirements of the Appleton Thorn Neighbourhood Plan and conclude that the Application Proposal is compliant with the Neighbourhood Plan as a whole. The table below summaries the Proposed Development compliance with the most relevant Neighbourhood Plan policies:-

Most Relevant Policies in Neighbourhood Plan	Proposed Development Compliance with Policy
Policy AT-D1 Design of Development in Appleton Parish Thorn Ward	Fully Comply
Policy AT-D2 Protecting and enhancing local landscape character and views	Fully Comply

Most Relevant Policies in Neighbourhood Plan	Proposed Development Compliance with Policy
Policy At-D3 Flood Risk, Water Management and Surface Water Run-Off	Fully Comply
Policy AT-TH1 Traffic Management and Transport Improvements	Fully Comply
Policy AT-TH2 Sustainable Transport Measures	Fully Comply
Policy At-E1 New Local Employment Opportunities	Fully Comply

6.274. We have considered the compliance of the Application Proposals with the Policy requirements of both the Core Strategy and the Appleton Parish Thorn Ward Neighbourhood Plan and conclude that the only non-compliance is in respect of certain aspects of Policies of CS Policies CS5 and CC2. In this regard however we consider that this non-compliance does not render the Application Proposals non-compliant as a whole with the Development Plan as they support the general thrust of the Policy requirements to deliver employment and regeneration.

6.275. The Application Proposals therefore comply with the Development Plan “as a whole” and hence there is a Section 38(6) presumption in their favour and also, they benefit from support from NPPF (21) paragraph 11(c) relating to approving development proposals that accord with the Development Plan without delay.

6.276. Section 38 provides that development that accords with the Development Plan should go ahead unless material considerations indicate otherwise. The Applicant considers that the Application Proposals comply with the Development Plan for the reasons set out above. We now go on to consider whether there are any “material considerations” that would weigh against our conclusions above.



## C) Material Considerations

- 6.277. The previous section demonstrates that the Proposed Development complies with the Development Plan and therefore in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 11 (c) of the NPPF there is a presumption (both statutory and policy) that the Application Proposal should be granted permission. As a consequence, it is necessary to assess whether there are any material considerations which indicate the permission should not be granted.
- 6.278. As identified in the earlier sections of this Replacement Planning Statement, the key material considerations relevant to the Application Proposal are:
- The policy on Need,
  - National Green Belt policy and whether very special circumstances exist to outweigh the harm to the Green Belt and any other harm;
  - Impact on Landscape Character and Visual Amenity;
  - Ground;
  - Heritage;
  - Traffic and Transport;
  - Ecology;
  - Air Quality; and
  - Utilities, Waste and Water.
- 6.279. It is clear from our assessment in Section 6 of this Replacement Planning Statement that none of these material considerations indicate that permission should be withheld, as any residual harm arising, if any, from these elements can be mitigated by suitably worded planning conditions and/or a Section 106 Agreement.
- 6.280. Other material considerations could also relate to:-
- Other Secretary of State decisions; and
  - Prematurity

- 6.281. The Secretary of State issued a decision on 2<sup>nd</sup> November 2020 in respect of Applications referenced 2017/31757 and 2019/34739 in relation to a proposed employment development for Eddie Stobart Ltd at land at Barleycastle Lane, Appleton Thorn, Warrington. The Secretary of State dismissed the appeal and refused the planning application. The Secretary of State found that the benefits of the proposal were not sufficient to outweigh the harm to the Green Belt such that the very special circumstances required to justify granting planning permission for inappropriate development in the Green Belt did not exist in this case.
- 6.282. The Eddie Stobart applicant's case was predicated upon the benefits of co-locating a proposed National Distribution Centre for Eddie Stobart Ltd with their existing ESL facility adjacent to their site. The Secretary of State ascribed "limited weight" to these benefits. The Applicant did not put forward evidence on the overall need and demand for logistics space nor an assessment of alternative sites to meet this need both outside of and within the Green Belt. The Secretary of State was therefore not asked to consider these matters which is a fundamental difference between the Eddie Stobart case and the Secretary of States decisions at Parkside (St Helens), Wingates (Bolton) and Symmetry Park (Wigan) which have been referenced elsewhere within this Replacement Planning Statement. This is also a fundamental difference between the Eddie Stobart case and the current Application Proposal.
- 6.283. In the Eddie Stobart case, the Secretary of State confirmed that the application was not "premature" to the emerging Warrington Local Plan and he also ascribed "significant weight" to the economic benefits of job creation and additional value added. These conclusions are directly applicable to the current Application Proposals.
- 6.284. The Secretary of State identified significant harm to the purposes and openness of Green Belt arising from the Eddie Stobart application scheme. As has been noted earlier within this Replacement Planning Statement, the Eddie Stobart land is identified as having a "strong" overall contribution to the Green Belt in the Council Local Plan Green Belt assessments whereas the Application Site has a "moderate" overall contribution. There is therefore a clear difference in the value of the Green Belt between the two pieces of land.
- 6.285. It is a clear part of planning practice that each application should be considered on its own merits. Whilst the Secretary of State's decisions in respect of the Eddie Stobart applications are informative there are clear differences between the Eddie Stobart scheme and the current Application Proposals in relation to both the value of the Green Belt between the two sites and the nature of the beneficial considerations that need to be weighed in the Planning Balance.

The three more recent Secretary of State decisions at Parkside (St Helens), Wingates (Bolton) and Symmetry Park (Wigan) are more representative of the Application Proposal beneficial considerations in respect of meeting an urgent and identified logistics need in the absence of alternative non-Green Belt sites. All of these applications were supported by the Secretary of State.

6.286. We have also given consideration as to whether the Application Proposals could be considered to be “premature”. The relevant policy approach is set out within the NPPF (21) within paragraphs 49 and 50:

*“49. However in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:*

- a) The development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) The emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*

*50. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting planning permission for the development concerned would prejudice the outcome of the plan-making process”.*

6.287. The Applicants have taken advice from Gateley Solicitors in this matter. Gateleys confirm that it is very important to pay close regard to the actual wording of National Policy in applying it. Paragraph 49 makes it clear that a refusal of permission on the grounds of prematurity is only justified in limited circumstances where both criterion (a) and criterion (b) are satisfied. The application of criterion (a) involves looking at the nature of the development proposed itself and how substantial it is or its cumulative effect and whether that would undermine the plan making process by pre-determining decisions about scale, location or phasing of new

development that are central to an emerging plan. Further, it is also necessary that the emerging plan is at an advanced stage. Paragraph 50 goes on to indicate that an ‘*advanced stage*’ means a plan that has been submitted for examination and provides that refusal on grounds of prematurity will seldom be justified if that has not occurred. Refusal on prematurity grounds is possible even if the plan has not been submitted for examination but will “*seldom*” arise and will clearly need additional justification. If refusal is to be brought forward on the ground of prematurity, the Local Planning Authority will need to indicate clearly what the prejudice is to the outcome of the plan making process.

- 6.288. Paragraph 49 has two limbs, both of which have to be satisfied. Paragraph 49 uses the word “both” to introduce the two criteria (a) and (b) which are linked by the conjunction “and”. There is no doubt that both tests have to be satisfied.
- 6.289. The first test looks at the scale of the proposal and asks whether or not it is substantial. The Application Proposal is of a substantial scale – 98ha. of land. The need for this scale of employment development in this location is justified by market information provided by JLL which shows that there is significant demand in the market place for B8 development in this locality, and that if the Site is made ready, it will come forward because there are no better alternative sites. The need for this scale of development in this location is justified by the Councils EDNA (August 2021).
- 6.290. In respect of paragraph 49(a), it is the case that the Application Proposals comprise a substantial proportion of the employment aspect of the South Warrington Employment Allocation. Given the B8 nature of the need for such development to be located adjacent to motorway junctions, and the lack of alternatives that are potentially available as shown within the EDNA (August 2021), it is the case that decisions about the location of future B8 development in the Local Plan are not being prejudiced. That is to say there is inevitability in the evidence base that B8 development has to be allocated here.
- 6.291. Criterion (b) poses the question as to whether or not the emerging plan is at an advanced stage. Further explanation is given for this in paragraph 50, where it is stated that refusal of planning permission on prematurity grounds will seldom be justified where the draft plan has yet to be submitted to examination. The Warrington Local Plan has not yet been submitted for examination. The proposed Submission Draft Local Plan has been the subject of consultation, and the Council will consider any objections and bring forward any modifications, although the nature of those is wholly unknown. It follows that the Plan is not at an advanced

stage and therefore criterion (b) in paragraph 49 is not met. The Courts have been clear that the development control process of processing and determining applications needs to carry on.

6.292. The position on prematurity is that under the NPPF (21) paragraph 49, both criterion (a) and (b) must be satisfied. The Warrington local Plan is not at an advanced stage as it has not been submitted for examination. Criterion (b) is therefore not satisfied and paragraph 49 prematurity does not apply at the present point in time. Consequently, the test within paragraph 49 for giving weight to prematurity as a potential reason for refusal is not satisfied in this instance.

6.293. Whilst the emerging Warrington Local Plan is a material consideration to which only limited weight can be given having regard to the stage of preparation, it is clear from the above analysis that the Application Proposals are not premature in policy terms. Whilst prematurity is capable of being a material consideration, it is clear in this case that the Application Proposals are not premature and hence prematurity is not therefore an issue that should be counted against the Application. This conclusion is in line with the Secretary of State's conclusion on prematurity in respect of the Eddie Stobart case.

## D) Non-Compliance with the Development Plan

- 6.294. For the reasons set out above, it is evident that the Application Proposals fully accord with the Development Plan. However, if contrary to this position, the Local Planning Authority decides that breaches of certain policies in the Development Plan mean that overall the Proposed Development is not in compliance with the Development Plan, then we consider that planning permission should still be granted because material considerations indicate that permission should be granted despite such a breach of the Development Plan.
- 6.295. We have identified within Section 6 that several policies within the Core Strategy do not fully accord with the guidance in NPPF (21) and hence that the weight to be attached to them should be reduced.
- 6.296. We consider that in this context, the “planning balance” weights significant in favour of the Proposed Development as the planning benefits set out in the “very special circumstances” section of the Replacement Planning Statement clearly outweigh any perceived policy and non-policy harm. In this situation we consider that in line with Paragraph 12 of the NPPF (21) there are very clear “material considerations” which would support the Local Planning Authority in departing from the Development Plan.

## 7. Potential Conditions and Section 106 Heads of Terms

7.1. The Proposed Development, given the scale and nature of the scheme, and the relevant planning policies set out below, is required to consider necessary planning contributions in order to render the proposals acceptable. As part of this process the applicant has considered the relevant policies and requirements in various areas of developer contributions, as well as the implications on the viability of scheme of making such contributions, as set out within The Framework. At this stage in the application determination process, following responses from relevant consultees, a number of obligations have been identified to off-set impacts identified and which will be required to form part of a S106. These are outlined below.

7.2. The proposed development will be subject to a range of conditions. These may include:

- The timing of the commencement of development.
- The requirements for and timing of reserved matters submissions.
- The requirement for reserved matters submissions to accord with the approved “parameters” relating to the amount of floorspace, scale, height, disposition of uses, green infrastructure, heritage, access and circulation, drainage and acoustic considerations.
- A minimum floor area requirement
- A requirement for a Local Employment Agreement
- Requirements for appearance/ materials.
- Highways, access and Travel Plan including timing and phasing (with triggers) for off-site highway improvements.
- HGV and car parking provision.
- Landscaping, boundary treatment and its management including bunding and planting.

- Habitat Creation, Enhancement and Management Plan, including a Landscape and Ecological Management Plan, which will provide a commitment to manage these areas over a circa 20 year period.
- Requirements for any further archaeological investigation or watching briefs.
- Details of the PROW diversion and related PROW boards
- Ground investigations and remediation.
- Foul and surface water drainage schemes.
- Details of a full Construction Environmental Management Plan.
- Details of further Noise Assessments required with each reserved matters and Noise Management Plans.
- Details of site and finished floor levels.
- Details of energy efficiency and renewable energy measures.
- Requirements for waste management (construction and operational).

## Section 106 Issues

- 7.3. Given the scale and nature of the Application Proposals and the relevant planning policies, there are several issues that the Applicant considers should form part of the provisions of a Section 106 Agreement, based on discussions which have taken place with Officers at the time of writing this Replacement Planning Statement.

### **Travel Plan**

- 7.4. Mechanisms to ensure the delivery of the initiatives within the Framework Travel Plan in respect of modal shift. The Framework Travel Plan will seek to minimise the level of traffic associated with staff trips, single occupancy trips and to promote sustainable modes of travel. Measures detailed in the Travel Plan and those set out below, including improvements to the



foot and cycle ways will help to mitigate the impacts of the traffic associated with the development proposals.

- 7.5. The Applicant and Council has agreed that a commuted sum of £600,000 towards improved bus services via a S106 financial obligation would be acceptable. This level of funding is comparable to the contribution Stobart agreed on their application which was to fund three shuttle buses from different directions (Warrington, Runcorn and Cadishead). There will also be a requirement to establish a Travel Plan Steering Group.

### **Highway and Footpath Improvements**

- 7.6. Improvements to the off-site road and footpath network. Following extensive discussions with Highways Officers at Warrington BC, and National Highways (formerly Highways England (HE)) an extensive package of mitigation works is proposed at the A50/Cliff Lane roundabout and M6 J20. The package which will be agreed via planning condition or S106 Agreement includes:

- Relocation of the A50 Cliff Lane roundabout to the west of its existing location to enhance the storage capacity of the link between the roundabout and the motorway;
- Full signalisation of the new realigned A50 Cliff Lane roundabout with widening of all approach arms and reduction of the exit arm onto the A50 to one lane;
- Widening of the A50 link between the A50 Cliff Lane roundabout to provide two lanes for much of the links length;
- Partial signalisation of the two M6 J20 dumbbell roundabouts;
- Widening of the M6 Northbound off-slip;
- Widening of the circulatory carriageway on the two M6 J20 dumbbell roundabouts and rationalisation of the lane markings / directional arrows; implementation of a yellow box and installation of queue detectors; and
- Widening on the eastern approach to the dumbbell roundabouts.

- 7.7. A footway and cycle way is proposed along the length of the Site's northern boundary and frontage with the B5356 Grappenhall Lane. This will be a 3.5m shared cycle way/footway 1.2km in length along this road corridor. Suitable pedestrian and cycle provision will be catered for within the internal Site layout as part of the development of a detailed scheme layout.

- 7.8. The Applicant has also agreed to commit to providing a commuted sum towards continuing this shared cycleway/footway beyond the Application boundary extending the footway to the Grappenhall Lane / Broad Lane roundabout to provide better pedestrian permeability and

connections. This would necessitate an additional 175m of footpath on existing highway land to the south of Grappenhall Lane to continue the pedestrian/cycle infrastructure to the Broad Lane roundabout.

7.9. It is understood that WBC would also like to see a new pedestrian/cycle crossing facility at the Broad Lane roundabout. This would further enhance connectivity with Broad Lane in the north and/or the southern section of Grappenhall Lane to connect with Barleycastle Lane. The Applicant is able to commit towards providing a commuted sum towards these improvements. The delivery of circa 1.5km of new pedestrian and cycle infrastructure and upgrades to the existing PROW network, would offer significant benefits over the existing situation. This infrastructure will enhance connectivity between the site and existing/proposed residential areas to the west, connectivity to Broad Lane. The enhanced PROW connections through the site and existing infrastructure at J20 does also provide a continuous link of connectivity to the M6 Junction 20 and beyond in the east and connectivity to the A50 Knutsford Road.

7.10. The Applicant has also agreed with WBC to safeguard a section of their land, which will be landscaped within the Application boundary extending from Grappenhall Lane to facilitate any future road widening and improvements required on Grappenhall Lane. This will ensure the protection of a 25m corridor along Grappenhall Lane can be achieved utilizing the existing adopted highway and a small part of the Applicant's land.

#### **Ecological enhancements**

7.11. Financial contributions towards off-site ecological mitigation. Loss of farmland habitat which is suitable for breeding skylark and overwintering birds such as lapwing and starling cannot be mitigated entirely within the scheme boundary. Following discussions with statutory consultees, GMEU the principle of an off-site mitigation strategy has been agreed to ensure that mitigation for such losses will be provided as a financial contribution to an off-site habitat management scheme. The off-site mitigation should be located within the local area (within WBC area). The exact details of the proposal will be agreed with WBC (and their statutory consultee GMEU) and can be secured via a Section 106 agreement. At the time of writing of this Replacement Planning Statement, the Applicant can confirm that discussions regarding the off-site habitat management scheme have advanced. The Applicants consultants have been in positive discussions with Mersey Gateway Environmental Trust (MGET) who are undertaking a grazing scheme to benefit farmland birds (notably lapwing and skylark) at Upper Moss Side

in Warrington, MGET have now identified a sum of £232,096.48 to be paid via a commuted sum towards the continued funding of this project over a 20 year period which will off-set the impacts on the site as a result of the loss of this farmland habitat, which has been agreed with the Applicant.

## 8. Conclusions

- 8.1. This Replacement Planning Statement has considered the Application Proposals which have been formulated in the context of an understanding of the constraints and opportunities which have resulted in the parameters plans that accompany this Application. The Application is supported by a range of technical and non-technical reports and information that identifies potential impacts and appropriate mitigation.
- 8.2. The Replacement Planning Statement concludes that the Application Proposals comply with the provisions of the Development Plan when considered as a whole and hence they should be approved “without delay”. Further the Replacement Planning Statement also concludes that the Application Proposals are in full compliance with the emerging Local Plan which seeks to allocate the Application Site as an employment allocation and hence remove it from the Green Belt. It is acknowledged that the weight ascribed to the emerging Local Plan is limited at this stage, however it also clear that Warrington Council recognise the need to release the Site from the Green Belt to meet the need for employment development.
- 8.3. The Replacement Planning Statement shows that there is “definitional” harm to the Green Belt, and harm to the “openness” and the “purposes” of the Green Belt. It is accepted that this harm to the Green Belt has substantial weight.
- 8.4. It also shows that there is “neutral impact” on ground; “Neutral/Positive Impact” on traffic and transport; “limited” impact to air quality, residential amenity, ecology and utilities and waste; “moderate harm” to heritage, and “moderate/major” harm to landscape character and visual amenity and agricultural land and soils.
- 8.5. The Replacement Planning Statement then assesses the significant benefits arising from the Application Proposals:
- The policy support for employment development within Warrington through the emerging evidence base is a significant material planning consideration in favour of the Application Proposals. We attach **SIGNIFICANT** weight to it.
  - The need for employment sites is a significant material planning consideration in favour of the Application Proposals. There is a significant need for the Proposed Development as confirmed by the recent EDNA (August 2021) produced on

behalf of the Council. South Warrington has been consistently promoted and recognised by Local Plan evidence as a key strategic location for logistics development. We consider that the need for employment sites is a significant material planning consideration in favour of the Application Proposals. We attach **SIGNIFICANT** weight to it.

- The Site is a suitable and deliverable development site that will form an important part of Warrington's employment land requirements. We consider that the suitability and deliverability of the Site is a significant material planning consideration in favour of the Application Proposals. We attach **SIGNIFICANT** weight to it.
- There are no alternative sites either outside of the Green Belt or on land in Green Belt that performs better than the Application Proposals in locational or deliverability terms. We consider that the lack of other alternative, available sites to meet the need for employment is a significant material planning consideration in favour of the Application Proposals. We attach **SIGNIFICANT** weight to them.
- The Application Proposals will provide a range of significant Economic, Social and Environmental benefits for Warrington and neighbouring authorities and the wider City Region (the ES Socio- Economic Technical Paper and its Addendum). We attach **SIGNIFICANT** weight to them.
- We consider that the environmental benefits of the Application Proposals are a significant material planning consideration in their favour. We attach **MODERATE** weight to these benefits.

8.6. In light of the above conclusions, the Replacement Planning Statement concludes that “very special circumstances” have been shown to exist in favour of the Proposed Development. In accordance with Section 38(6) of the Planning Acts, it is concluded therefore that the Application Proposals accords with the provisions of the Development Plan as “very special circumstances” have been shown to exist and hence planning permission should be granted as material considerations do not indicate otherwise.

## 9. Appendices

## **Appendix I – JLL Proof of Evidence**

**PROOF OF EVIDENCE OF ANDREW PEXTON IN RELATION TO NEED AND  
DEMAND FOR EMPLOYMENT LAND AND PREMISES**

**FOR**

**PARKSIDE REGENERATION LLP RELATING TO THE CALLED-IN  
PLANNING APPLICATION FOR THE FORMER PARKSIDE COLLIERY,  
PHASE 1, WINWICK ROAD, NEWTON LE WILLOWS**

**LOCAL PLANNING AUTHORITY REFERENCE: P/2018/0048/OUP**

**SECRETARY OF STATES REF: PCU/CONS/H4315/324468**

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**TOWN AND COUNTRY PLANNING ACT 1990 SECTION 77**

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT  
PROCEDURE) (ENGLAND) ORDER 2015**

**TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND)  
RULES 2000**

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## Contents

<b>1</b>	<b>Qualifications and Experience.....</b>	<b>1</b>
<b>2</b>	<b>Introduction .....</b>	<b>3</b>
<b>3</b>	<b>Executive Summary.....</b>	<b>4</b>
<b>4</b>	<b>Parkside Proposal.....</b>	<b>7</b>
<b>5</b>	<b>Market Overview .....</b>	<b>8</b>
<b>6</b>	<b>Market Trends .....</b>	<b>20</b>
<b>7</b>	<b>Demand.....</b>	<b>24</b>
<b>8</b>	<b>Supply .....</b>	<b>28</b>
<b>9</b>	<b>Employment Land – Adjoining Boroughs Qualitative and Quantitative Assessment .....</b>	<b>34</b>
<b>10</b>	<b>St Helens Council Employment Land – Qualitative and Quantitative Assessment .....</b>	<b>40</b>
<b>11</b>	<b>Logistics Study .....</b>	<b>49</b>
<b>12</b>	<b>Subject Site.....</b>	<b>51</b>
<b>13</b>	<b>Conclusions.....</b>	<b>53</b>

## **1 Qualifications and Experience**

I am Andrew Pexton, BSc (Hons) MRICS, a member of the Royal Institution of Chartered Surveyors, and I commenced working in the profession in 1988.

I have worked in the Industrial Agency and Development sector since 1988. I have acted for occupiers, investors and developers advising on aspects of industrial development and agency.

I am the Lead Director in the North West Industrial and Logistics Team, based in the Manchester office of Jones Lang LaSalle.

In the Manchester office the Industrial and Logistics team currently advise on over 185,800 sq. m of built stock and over 162 hectares of development land. Examples of my work include

- Advice to B&M Retail on the acquisition of 56,762 sq. m, Speke.
- Development advice to IPIF on letting a 23,225 sq. m unit and the development of a 3.44-hectare site in Trafford Park.
- Advice to Miller Developments at Omega, Warrington on the 237 hectare development site.
- Letting and development advice to Mountpark on the development of 68,280 sq. m of logistics buildings.
- Acting on behalf of Exeter Property Group / Panattoni on the letting of 34,950 sq. m to Dixons Retail Group.
- Acquisition advice to LSE Retail Group on the letting of 12,654 sq. m new build.
- Disposal advice to Stoford Developments at Icon, Manchester Airport for over 65,055 sq. m of both build to suit and speculative units.

I confirm that my report has drawn attention to all material facts which are relevant and have affected my professional opinion.

I confirm that I understand and have complied with my duty as an expert witness which overrides any duty to those instructing or paying me, that I have given my evidence impartially and objectively, and that I will continue to comply with that duty as required.

I confirm that I am not instructed under any conditional or other success-based fee arrangement.

I confirm that I have no conflicts of interest.

I confirm that I am aware of and have complied with the requirements of the rules, protocols and directions of the appeal.

I confirm that my report complies with the requirements of RICS – Royal Institution of Chartered Surveyors, as set down in the RICS practice statement ‘Surveyors acting as expert witnesses’.

Signed 

Date 3<sup>rd</sup> December 2020

## **2 Introduction**

- 2.1 I am instructed by Parkside Regeneration Ltd to provide expert witness evidence in relation to employment land and market need for the development of the former Parkside Colliery Phase 1, Newton le Willows as identified in planning application reference P/2018/0048/OUP.
- 2.2 The outline application (all matters reserved except for means of access) comprises the construction of up to 92,900 sq. m of employment floorspace (Use Class B8 with ancillary B1(a) offices) and associated servicing and infrastructure
- 2.3 The application site is 45.9 hectares in area. The application site is part of a wider development proposal for the colliery that will provide an additional 43 hectares of land for logistics and manufacturing as part of a Phase 2.

### **3 Executive Summary**

- 3.1 The logistics sector has developed from traditional storage and distribution uses expanding to include multi-channel retail which has caused an increase in demand for warehouse premises.
- 3.2 The impact of Covid 19 on the sector nationally has accelerated the move from High Street retail to internet purchases among the general public with the e-commerce sector accounting for over 34% of the national take up of Grade A warehouses in Q1 – Q3 2020. It has increased occupier requirements due to social distancing. When combined with Brexit it has increased the need for resilience in the supply chain for all sectors.
- 3.3 Regional Grade A take up to date in 2020 is 274,800 sq. m. This has exceeded both the five- and ten-year regional averages of 209,000 sq. m and 231,000 sq. m respectively. This is not the highest annual take up over the last ten years suggesting this is not a one-year spike.
- 3.4 There are only 10 logistics buildings available or under construction totalling 168,541 sq. m in the North West - two of these are under offer. Excluding the two units that are under offer this equates to approximately 9 - 10 month's supply based on the ten- and five-year average take up respectively. There is an extremely limited development pipeline of units and suitable development sites. This is already having an adverse effect on the market with a lack of buildings going forward and will cause a lag in the availability of buildings to the market.

- 3.5 There are approximately 50 industrial and logistics requirements currently in the North West for units over 9,292 sq. m. The total floor area requirement is between 1.043m sq. to 1.341m sq. The requirements are for a mixture of existing buildings or build to suit. There is a large imbalance between building supply and demand where current supply cannot satisfy demand. This is to the detriment of the economy.
- 3.6 Quantitatively and qualitatively there is a shortage of suitable development sites capable of accommodating the requirements within the region.
- 3.7 Quantitatively and qualitatively there are no development sites with a valid planning consent capable of satisfying the requirements listed in 3.8 within the St. Helens administrative area. The only suitable sites that could be considered are Omega West (St. Helens resolution to grant consent) and Parkside (subject to call-in). Assuming the planning consent is validated for Omega West the allocation in the draft local plan has already been taken up by TJ Morris. The Omega West site should be discounted as it is to meet the needs of Warrington Borough Council employment land supply. The Draft Local Plan, if approved will provide two immediately available sites suitable for logistics development on the M6 and M62 corridors. One of these sites is Parkside, the other Omega West.
- 3.8 Parkside satisfies the criteria for being able to accommodate the larger floorplate buildings in excess of 27,870 sq. m. The criteria are
- Large Footprint
  - Physical Characteristics- flat, regular shaped serviced sites
  - Motorway access
  - Land Ownership
  - Deliverability
  - Adequate Labour Supply

- Access to Port and Rail

- 3.9 Model Logic, a logistics consultancy has prepared a logistics report confirming Parkside as one of the prime locations in the North West for a regional distribution centre in terms of motorway access, population density/catchment area and last mile delivery. This confirms its suitability for development for the logistics sector.
- 3.10 Parkside is located in the wider Warrington/M6 corridor (junctions 20 – 25) market sector. This is a popular market location given the motorway intersections/connectivity. The majority of requirements in the North West are for buildings and sites in this market location. There have been four lettings of large floorplate units over 27,870 sq.m in this market sector totalling 149,067 sq. m in the last three years.
- 3.11 In addition to Parkside there are three additional sites being considered at Call-In. There is sufficient demand and a need for a suitable land supply to develop all four sites which have a combined floor area of 452,423 sq. m.
- 3.12 In summary there is an extreme shortage of available and deliverable sites to satisfy demand in the North West. If this planning consent is refused this will have an adverse impact on the regional economy. Companies will relocate to other regions where there is supply or operate inefficiently from existing facilities which will potentially put their businesses at risk. Parkside is located in an attractive location along the M6 corridor which is in demand and is deliverable in a realistic timescale.

## **4 Parkside Proposal**

- 4.1 The proposed development at Parkside will provide 92,900 sq.m of B8 with ancillary B1a (warehouse and ancillary offices) in three plots and will be accessed off the A49 (Winwick Road). The site can be accessed off junction 9 of the M62 and junction 22 of the M6.
- 4.2 The 45.9 ha site can offer three development plots, the indicative masterplan shows units of 52,024 sqm, 21,544 sq. m and 19,123 sq. m. The site can offer a range of units that are in demand to satisfy the regional logistics market.



## 5 Market Overview

### National Overview

- 5.1 In an unprecedented situation caused by Covid 19 the national industrial and logistics market has had a strong performance in the first nine months in 2020. 2019 was also a strong year with confidence in the sector brought about predominantly in the last quarter of the year due to the certainty generated by the General Election and Brexit.
- 5.2 The logistics sector has seen a rapidly changing market with the impact of Covid 19 on the UK. This generated an immediate need for short term storage from supermarkets and government related contracts This subsequently changed with a large number of requirements for 12 – 18 month leases which generally relate to goods that were in transit from China and the Far East and needed storage space until they could be sold.
- 5.3 Throughout this period there has been a consistent number of requirements from companies needing to undertake structural relocations for their businesses. At the height of the Covid 19 crisis these requirements became less important as the focus of the companies were operational matters. These requirements have become live again as they are driven by lease events and operational changes.
- 5.4 The main impact has been in response to the Covid 19. There have been changes in the market which have resulted in the need for more warehouse space. These have included
- shopping patterns have changed with an increase in internet sales, home working has made home delivery more convenient this increases the demand for warehousing – both in terms of supplying goods but also product returns

- supply chains are adapting to carry more stock to prevent future shortages for manufacturers and consumers
- manufacturers are re-shoring elements of production to ensure that they have resilience in their network should a further spike occur
- diversification of production (to avoid over reliance on a single supplier) will increase manufacturing and storage requirements
- workspace distancing – especially for product picking will increase the floor area required to carry out the same pre Covid task.
- automation will place less reliance on the workforce in terms of the impact of an outbreak of Covid and increase the resilience of the business.
- The majority of the above issues are equally applicable to the impact and future proofing that companies are undertaking with regard to Brexit

5.5 The main sectors for demand have been from e-commerce, retailers and third-party logistics providers. The requirements are mainly to enable the occupier to operate an automated/part automated facility and for taller buildings with larger floorplates to give economies of scale that are necessary for the level of investment required in the handling systems.

5.6 A number of recent research publications have highlighted the expansion of the logistics sector by e-commerce.

5.7 **Delivering the Goods in 2020** (Turley for the British Property Federation [BPF]) highlights that online sales are expected to grow from 11 pence in the retail pound to 19 pence by 2028. (Core Document Ref 4.157, page 5 para 8)

- 5.8 The BPF report **What Warehousing Where 2018** concluded that the average household required 6.41 sq. m of warehouse space for its e-commerce requirements. (Core Document Ref 4.155 page 29). Based on the relationship between the government’s target of 300,000 new homes per annum this creates an increased need of 1.95m sq.m of warehousing per annum. This would create the equivalent of 25,000 Full Time Equivalent jobs. The report acknowledges that the ratio of warehouse area to households has been increasing with the growth of e-commerce. The report also concludes that there will be market saturation for the online sector by 2035.
- 5.9 The national Grade A take-up totalled 2.05 m sq. m in January to September 2020 and 1.85m sq. m in 2019. The 2019 take-up matched the five-year historic average and 2020 will exceed these levels.

5.10 The national take up can be summarised below

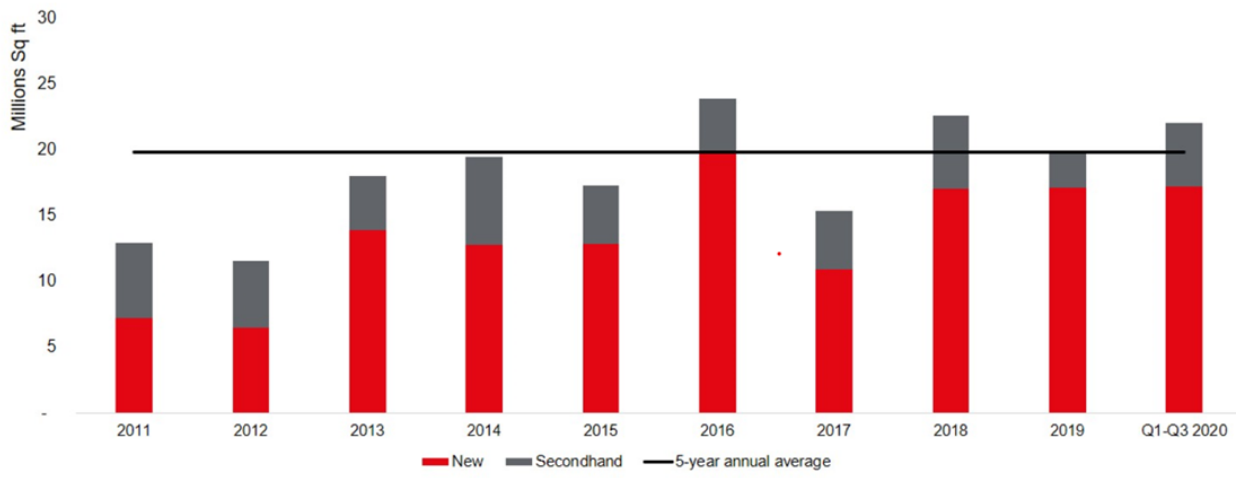
**2019**

Grade A take Up	1.85m sq. m
Take up by e commerce	24%
Grade A supply	2.7 m sq. m
Vacancy Rate	9%

**2020 Q1 – Q3**

Grade A take up	2.05m sq. m
Grade A take Up >12 mths	0.9 m sq. m
Grade A take up <12 mths	0.22 m sq. m
Take up by e-commerce	34%
Grade A supply	2.09 m sq. m
Vacancy Rate	7%

Take up in 2019 and the projected full year figures for 2020 will exceed the ten-year average of c 1.766 m sq. m as shown in Table 1 below:



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Table 1

5.11 Historically take up was focussed on build to suit units rather than speculatively built units. This has been consistent since 2012 as shown in Table 2 below. With the impact of Covid 19 this will likely result in an increase in the number of existing buildings that have been occupied due to the immediacy of requirements, but the overall floor area occupied will still show a focus on build to suit due to floorplate sizes.

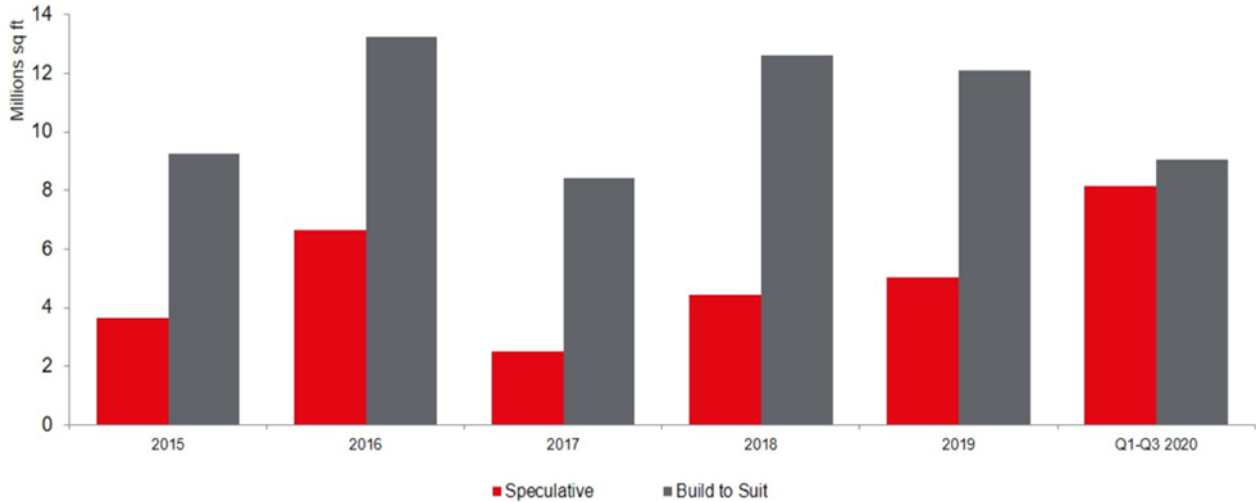


Table 2

5.12 Retailers were the most active sector accounting for 58% of all grade A take up in Q1-Q3 2020 and 40% of the annual take up in 2019. This is consistent with 2018 reflecting the change in shopping habits. The internet/e-commerce sector has continued to expand with High Street retailers changing their sales platforms to compete on-line. In 2019 approximately 24% of all Grade A related logistics take up was for dedicated internet fulfilment and in Q1 – Q3 of 2020 this has increased to 34% of take up.

5.13 Table 3 shows the projected internet sales (pre COVID 19) and take up of logistics space for this sector. This shows an increase given the effects of COVID 19 on shopping habits.

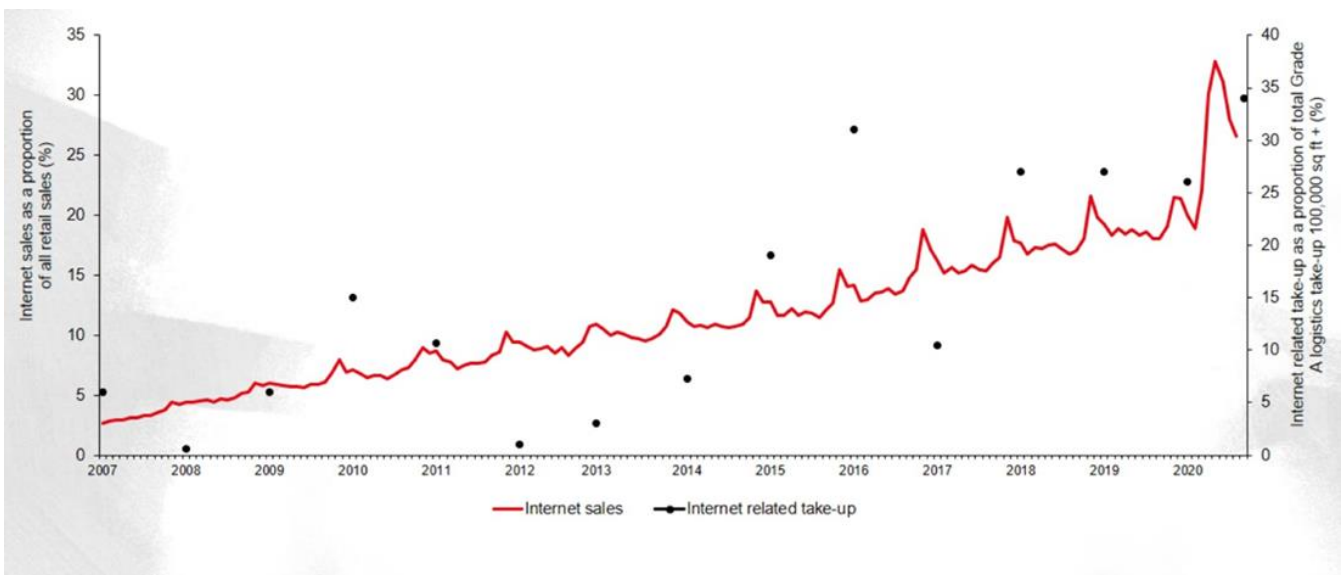


Table 3

5.14 In terms of take up by region the East Midlands and Greater South East had the highest take up with a combined figure of 65%.

- 5.15 The Grade A supply at the end of Q3 2020 was 2.09m sq. m, at the end of 2019 it was 2.65m sq. m – a reduction of 17%. The North West had approximately 10% of the national supply, the South East had the largest supply with 21% with the East and West Midlands with 26% and 20% respectively.
- 5.16 Nationally, JLL’s vacancy rate for modern logistics stock is 7% at the end of Q3 2020 and was 9% at the end of 2019.
- 5.17 In summary the lockdown from March 2020 accelerated the change in market dynamics. Urgent demand for warehouse capacity in health, online and supermarket retailing sectors has meant that demand has continued. This has resulted in a reduction in the national supply to a vacancy rate of 7% at the end of Q3 2020.

### **Regional Overview**

- 5.18 The North West market is an attractive location for the industrial and logistics sector. The area has excellent motorway access, demographics and catchment population.
- 5.19 Covid 19 has had a similar impact on the regional market as discussed in paragraphs 5.2 –5.5 in the national overview.
- 5.20 The average five- and ten-year annual take up of Grade A accommodation is 209,000 sq. m and 231,000 sq. m respectively.
- 5.21 In 2020 the take up to the end of Q3 is 274,800 sq. m. This is in excess of both the five- and ten-year average for a full year.

- 5.22 The availability of Grade A accommodation at Q3 2020 is 168,541 sq. m. in ten buildings, one of these is under offer. There are six speculatively constructed buildings, two units under construction and two existing buildings available.
- 5.23 There has been a dominance of transactions to retailers in the region mainly with e-commerce activity. Recent transactions in Q3 2020 include: Dixons Retail Group 34,950 sq. m – 375 @Logistics North, Bolton and a major North West internet based company has taken 55,461 sq. m – Icon, Manchester Airport
- 5.24 The North West regional market can be defined along the main motorway corridors of
- M6 Crewe to Preston;
  - M62 Liverpool to Manchester and
  - M60 Manchester Orbital motorway
- 5.25 At Appendix One is a regional map highlighting the main market sectors.
- 5.26 Within these three corridors there are more defined sub-regions/markets
- M6 - This can be divided into three main sectors
    - J16 – 18 Crewe to Middlewich/Winsford
    - J19 – 21 Specific Warrington market/J20 – 25 The wider M6 corridor including Haydock, St. Helens and Wigan
    - J28 – 31 Chorley/Leyland and Preston
  - M62 - This can be divided into
    - J1 – J3/M57 corridor – the core Liverpool market
    - J8 – J11 – the main Warrington market
    - J12 – J21 – the west/north Manchester market



M60 - This can be divided into

J12 – 15 - M60(W)/M61 Salford/Bolton

J17 – 21 – North/NE Manchester – Bury/Oldham/Rochdale

J23 – 2 – East/SE - Stockport/Ashton

J4 – 10 – M56/ West Manchester/Trafford Park

5.27 The relevant market areas to this call in are highlighted on the plan at Appendix 1 and are discussed below. There is some overlap in certain areas of the market, but the main sectors are centred along the M6, Warrington to Wigan; M60, Trafford Park and M60/M61, north west Manchester.

5.28 **M6, Warrington to Wigan** - The M6/M62 intersection is generally regarded as the prime location as it connects the two main motorway corridors. The surrounding area benefits from access to the motorways (M62 J8 – J11 and M6 J20 – 25) and A road network including the A580 (East Lancs. Road) and A49. Omega Warrington is located at junction 8 of the M62, 3 miles from the M6 intersection. The M6 corridor between junctions 20 – 25 has historically had a mixture of manufacturing and more latterly distribution companies locating in the area. The redevelopment of former manufacturing sites has enabled development for distribution use (Poundland DC – 32,500 sq. m unit at Three Sisters, Wigan and 37,160 sq. m built for Nice-Pak at Westwood Park, Wigan).

Within the last three years there have been four buildings of over 27,870 sq. m developed and let along this corridor totalling 149,067 sq. m.

5.29 **M60/Trafford Park** – The area is an established industrial and distribution location, serving the Greater Manchester conurbation. The estate is mainly built out, infill development/redevelopment limits the opportunities for large scale redevelopment. At present there are only two sites available for new build in the area, Grand Central which has planning consent for c 18,208 sq. m and t150, a site which can accommodate 13,935 sq. m. Trafford Park is a popular location but there are limited opportunities for development. Confirming the limited supply there have been two lettings of units still under construction at Carrington (Unit 1 Carrington Gateway - 9,661 sq. m.) and Irlam (Eclipse 138 – 12,820 sq. m), both occupiers preferred Trafford Park, but no suitable units were immediately available.

5.30 **M60/M61/ Salford/Bolton** – This area has excellent motorway access to the region via the M61, M60, M62 and A580 (East Lancs. Road). It has strong connectivity to the local boroughs which provide the workforce and has been a successful sub-market with the take up at Logistics North, Bolton.

The main reasons for the growth in these locations is a mixture of excellent motorway access, labour supply and being able to offer large floorplate sites capable of accommodating requirements of between 13,935 sq. m – 46,450 sq. m.

## **Major Regional Development Sites**

- 5.31 The main development sites for major logistics development over the last 5 – 10 years have been Omega, Warrington; Logistics North, Bolton, and latterly M6 Major/North Florida Farm, Haydock. Omega and M6 Major/North Florida Farm are located in the market area that is relevant to Parkside.
- 5.32 Omega, Warrington has been developed out since 2012 with over 407,831 sq. m having been built out and a further 47,379 sq. m currently under construction. The site is located at junction 8 of the M62 and has been developed by Omega Warrington Ltd. There are currently thirteen buildings over 9,292 sq. m that have been built out with a further two units under construction. The average unit size is 30,493 sq. m. There is one plot left with a detailed planning consent for a unit of 20,902 sq. m, with construction due to commence in January 2021. The remainder of the site is built out.
- 5.33 Logistics North was granted planning consent in 2014 and has subsequently built out over 185,800 sq. m with a site purchase for a plot for 90,577 sq. m distribution facility for Lidl. The development is located at Junction 4, M61 and was developed by Harworth Group. There are seven buildings over 9,292 sq. m. The average unit size is 27,664 sq. m.

- 5.34 M6 Major/North Florida Farm, Haydock was granted consent in late 2018, part was pre let to Amazon 33,444 sq. m and a speculative unit of 48,828 sq. m was let within 8 months of practical completion to Kellogg's. The development was undertaken by Bericote Properties, the average unit size was 41,136 sq. m. The site was built out and occupied by April 2020 – 19 months from the grant of planning consent, showing the demand in the area.
- 5.35 The sites have excellent access to a motorway junction. Omega and Logistics North are located adjacent to motorway junctions and M6 Major/North Florida Farm is within 1.5 miles of junction 23, M6.
- 5.36 All sites could offer large floorplates with the average built unit size being 30,570 sq. m This confirms the demand for large footprint buildings in these locations.
- 5.37 In summary there is a strong market for logistics in the North West. Over 652,462 sq.m of predominantly logistics floorspace has been developed in the Greater Warrington submarket area since 2011. The successful developments are all located in proximity to the sites that are subject to the Secretary of State's determination confirming that these are acceptable locations for logistics operations. M6 Major/Florida Farm and Omega are both located within the core M6 market area and show the level of take up and attractiveness of the specific location to the market.

## 6 Market Trends

6.1 The logistics sector is adapting to the current requirements of both occupiers and customers. There have been a consistent number of requirements from companies needing to undertake structural relocations for their businesses. These requirements are driven by lease events and operational changes. In contrast in response to the Covid 19 there have also been structural changes in the market which have resulted in the need for more warehouse space. These have been outlined in Paragraph 5.4 above.

6.2 The main trends are

- taller buildings, 15 m to the underside of the steel frame was regarded as the industry standard but this is being increased to 18 – 24m by the requirements of automation. This is resulting in more build to suit facilities due to the specification.
- larger building floorplates offer the economies of scale and enable centralisation of storage into regional or national distribution centres. Typical building sizes are increasing with the needs of automation.
- warehouses which are automated require larger power requirements for both the handling systems and the IT needed to run the facility. Combined with the move to electric vehicles and the need for charging points, this increases the power requirements.

6.3 Large-scale distribution developments should therefore satisfy the following criteria to provide development sites

- Large footprint
- Physical Characteristics- flat, regular shaped serviced sites
- Motorway access
- Land Ownership
- Deliverability
- Labour Supply
- Access to Ports and Rail

6.4 Large footprint – the site should have the ability to offer a range of building sizes from 27,670 sq. m to 46,450 sq. with appropriate yard areas and parking facilities.

6.5 Physical Characteristics – there should be no site-specific barriers to development such as

- Topography/Shape of site – delivery of regular shaped plots capable of accommodating a range of building sizes
- Service provision – the availability of adequate utility services and drainage or ability to deliver within a reasonable timescale
- Environmental – no on-site constraints, flood risk, ecology, trees
- Proximity to sensitive uses- ensuring 24/7 operation.

6.6 Motorway/Strategic Road Access – the uses require access to motorway junctions and the strategic road network. This is supported in the latest NPPF at paragraph 82.

6.7 Land Ownership – sites should be optioned or in the control of a single party to ensure deliverability. Public rights of way should be capable of diversion.

- 6.8 Deliverability – sites should not be affected by issues outside the owners/developer’s control.
- 6.9 Labour Supply – access to workforce, availability of public transport. Previously employment in warehousing had a perception of low pay. By contrast the average salaries in the logistics sector are now higher than the average in all other sectors in the Northern Powerhouse - £30,500 per annum as opposed to £27,800 per annum for all sectors. (BPF [Economic Contribution of Logistics in the Northern Powerhouse](#)). (Core Document Ref. 4.156 Page 7)
- 6.10 Access to Ports and Rail – the ability to offer multi-modal transport is becoming an important factor for logistics companies and their clients. The impact of the Green Agenda and requirements for reduced emissions from vehicles by 2040 all add to the need for distribution centres to be in accessible locations. This is supported by the Liverpool City Region Growth Strategy where logistics has been established as a key growth sector linked to the development of the Superport concept. The Superport Market Analysis report emphasised the importance of establishing a pipeline of strategic sites as logistics clusters. Parkside represents a strategic opportunity at the sub-regional level, due to its strategic location and scale of opportunity.

- 6.11 The effect of the above on the sector will create further demand for warehousing and have a greater impact on the functionally obsolescent buildings. Occupiers will need to relocate to more efficient facilities for their own purposes or as part of a corporate or contractual requirement with the end user. Immediate requirements will focus on a speculative development whilst longer term requirements can consider units on a build to suit basis.
- 6.12 Parkside can satisfy these criteria as it offers large floorplates, is deliverable, has a large labour supply, motorway access and proximity to both rail terminals and the Port of Liverpool/Liverpool 2. It is supported by the Liverpool City Region Growth Strategy which would establish the site as part of a logistics cluster.



## 7 Demand

7.1 The average five- and ten-year annual take up of Grade A accommodation in the North West is 209,000 sq. m and 231,000 sq. m respectively.

7.2 In 2020 the take up to the end of Q3 is 274,786 sq. m. This is in excess of both the five- and ten-year average for a full year.

7.3 The last ten year take up is shown in the Table 4 below

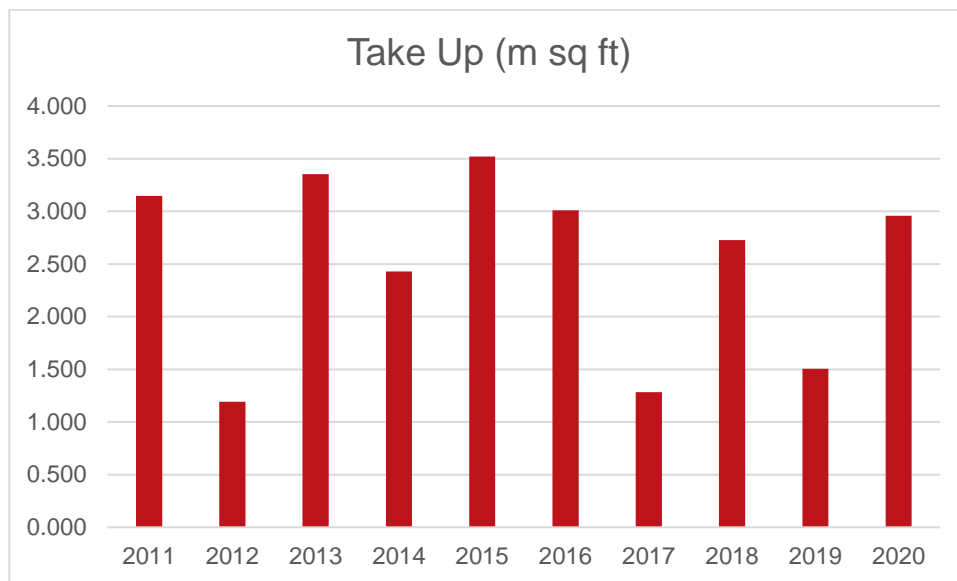


Table 4

7.4 At Appendix Two the annual take up 2011 – 2020 and requirements are listed as agreed between the employment land expert witnesses.

7.5 The take up from 2015 to Q3 2020 has been analysed between existing, speculatively built and build to suit as shown in Table 5 below

<b>Year</b>	<b>Existing (Grade A)</b>	<b>Speculative Build</b>	<b>Build to Suit</b>
2015	35%	14%	51%
2016	13%	56%	31%
2017	0%	40%	60%
2018	33%	37%	30%
2019	39%	40%	21%
Annual Average	24%	37.4%	38.6%
2020 (Q1-Q3)	0%	75%	25%

Table 5

7.6 Speculative build and build to suit have been the dominant sectors. The existing stock will generally be older and of a poorer specification. This highlights the availability of types of stock, occupier requirements and timescales for occupation.

7.7 In the North West there are 50 live requirements in excess of 9,292 sq. m that are listed at Appendix Three with a total size range of 1.043m sq. m to 1.341m sq. m.

7.8 The searches are for a mixture of existing and build to suit requirements. The requirements for existing buildings are more immediate, with few options available.

- 7.9 There are 20 requirements where the search parameters are 27,870 sq. m or over totalling 826,810 sq. m (this includes the TJ Morris requirement where planning consent has been granted at Omega West). Eleven of these requirements are focussed in the Greater Warrington market area this equates to a floor area requirement of 501,660 sq. m.
- 7.10 The larger requirements are generally for either existing or build to suit options. Several of the requirements are considered below:
- 7.11 RGD Consulting 23,225 – 32,515 sq. m - the requirement is for a food production company looking to find a building with a large power and water supply. Preference is for the Warrington area subject to being able to satisfy the above criteria.
- 7.12 CBRE - 17,166 sq. m - now a satisfied enquiry, looking to consolidate onto a single site and vacate four other properties. The company is based in Warrington and wanted to stay in the vicinity.
- 7.13 CBRE – 18,000 sq. m - seeking a unit for a specific parcel delivery company. Large land requirement due to length of the unit considering locations with good motorway access.
- 7.14 Kinney Green 37,160 sq. m - instructed to search for a site within 30 miles of the Port of Liverpool. Will ideally purchase a build to suit but will consider existing buildings.
- 7.15 The table of requirements shows a strong demand in the market. Based on the available supply in Section 8 it is clear that current demand exceeds supply with between 1.043m sq. m to 1.341m sq.m of active requirements against a built supply of 168,541 sq. m.

7.16 In summary the wider Warrington/M6 market is a strong location with 4 lettings of large floorplate units totalling 149,067 sq. m in the last three years. This shows the demand for a popular location. In terms of demand there are twenty enquiries for units of 27,870 sq. m or over, eleven of these totalling 501,660 sq. m are focussed on the wider Warrington area. This confirms the need for the subject site. If Parkside was developed specifically for these requirements it can only satisfy 18.5% of the demand further highlighting the lack of supply.

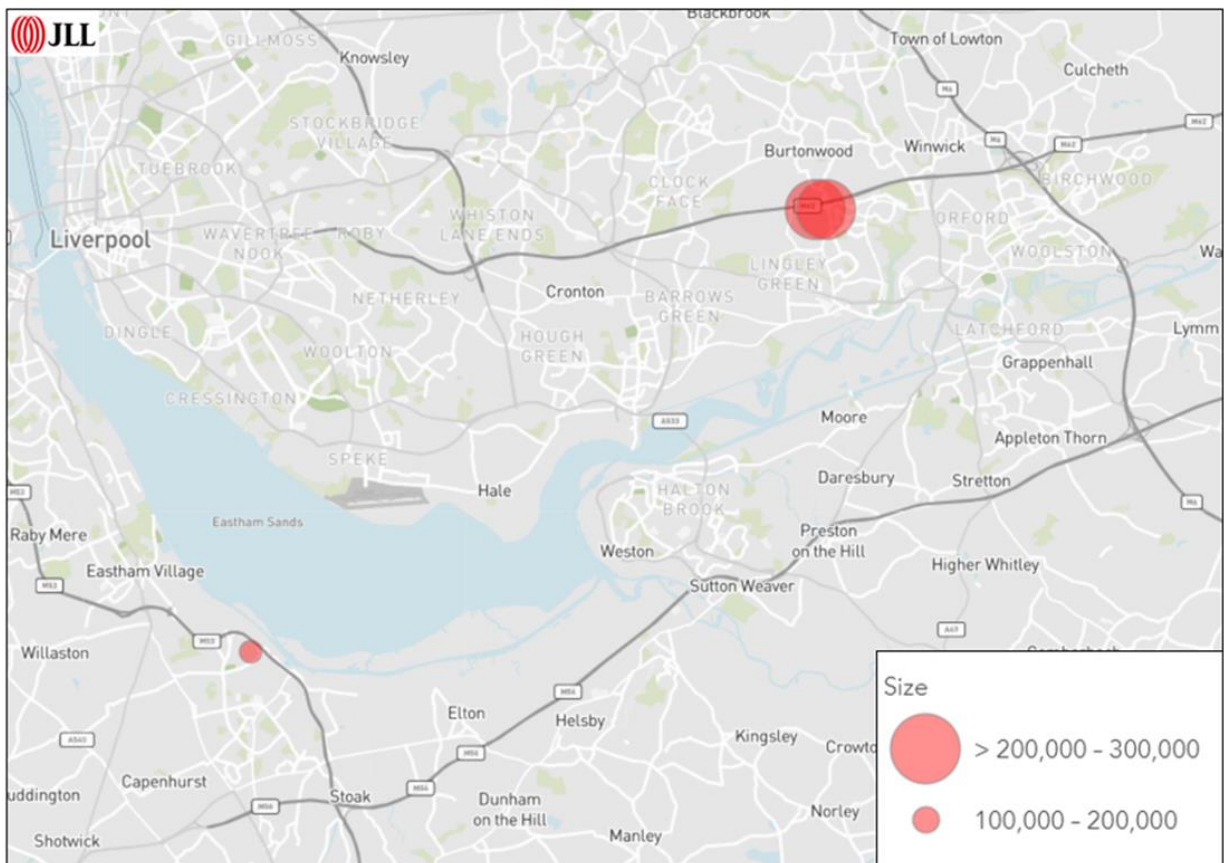
## 8 Supply

8.1 The availability of existing Grade A, speculative build and units under construction which are over 9,292 sq. m is summarised below. This has been agreed between the employment witnesses for Wingates, J25 Symmetry Park, Haydock Point and Parkside.

### Speculative build units under construction

8.2 There are 3 units currently under construction totalling 60,290 sq. m, one of these units 28,595 sq. m or 47% of the total floor area has been let prior to completion.

8.3 The unit was let to Gousto – an online food retailer. There is 31,695 sq. m available in the 2 remaining units as shown in Map 1 and Table 6 below



Map 1

<b>Under Construction</b>	<b>Sq. m</b>
<i>Unit 3 Mountpark Omega, Warrington Phase 2 (discounted as start on site Jan 2021)</i>	20,932
Unit 2 Mountpark Omega, Warrington Phase 2	18,875
PLP Ellesmere Port	12,820
<b>Total</b>	<b>31,695</b>

Table 6

## Speculative Build

8.4 There are six speculative build units available with a total floor area of 88,284 sq. m.

<b>Existing Speculative Build</b>	<b>sq.m</b>
Venus 217, Knowsley Industrial Estate (under offer)	20,230
Kingsway 216, Kingsway Business Park, Rochdale	20,104
F2/G Multiply Logistics North, Bolton	13,860
H2 Heywood Distribution Park, Heywood (under offer)	13,829
Academy, Knowsley	10,219
Liberty Park, Widnes	10,042
<b>Total</b>	<b>88,284</b>

Table 7

## Existing Buildings

8.5 The supply of Grade A existing stock is limited there are only two buildings available totalling 48,562 sq. m.

Unit	Size sq.m
L175, Liverpool	16,357
Martland 350, Wigan	32,205
<b>Total</b>	<b>48,562</b>

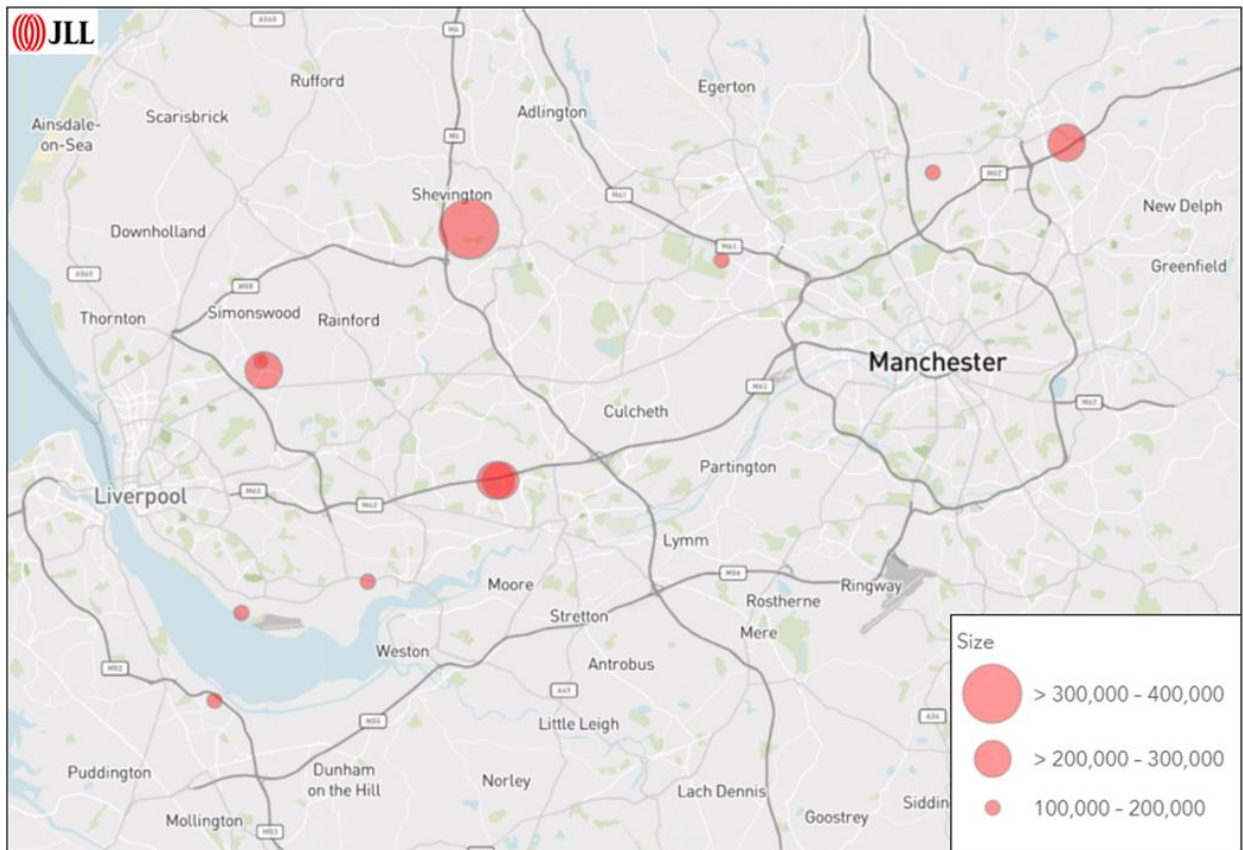
Table 8

8.6 The total available supply is broken down below in Table 9 and shown on Map 2 below.

Type	No. of Units	
Units under construction	2	31,695 sq. m.
New speculative build	6	88,284 sq. m.
Existing Grade A units	2	48,562 sq. m
<b>Total</b>	<b>10</b>	<b>168,541 sq. m</b>

Table 9





Map 2

- 8.7 Based on the 5-year average annual take up of 209,000 sq. m there is 10 months' supply. Based on the 10-year average annual take up of 231,000 sq. m there is 9 months' supply.
- 8.8 If the acquisition of the units that are under offer (H2 Heywood and Venus 217) complete this year, the annual take up for 2020 will be 308,859 sq. m. The available supply will be 134,482 sq. m. This equates to 8 months' supply on the 5-year average or 7 months' supply on the 10-year average.
- 8.9 The major issue is that there is no pipeline behind this and in reality, it takes between 15 – 24 months to secure and implement a planning consent on a site. This is therefore a major concern as when the 9 – 10 months' supply is taken up even if sites have submitted planning applications now there will be a period where there could be no grade A supply immediately available.

- 8.10 This could cause issues for occupiers not being able to satisfy demand. An example of this is a recent letting to AO.com who are based in Crewe and were looking for a unit of c 27,670 sq. m north of Crewe with immediate availability. Due to a lack of availability they acquired a unit in Stoke. Long term demand in terms of regional take up show the strength of the North West logistics and industrial sectors and the need for a substantial and deliverable supply.
- 8.11 In summary the North West distribution market has an extremely limited supply of buildings providing between 9- and 10-months' supply based on the 5- and 10-year average take up. The lack of suitable buildings and sites will be to the economic detriment of the region. This will lead to the potential loss of new employment if there are no suitable properties or sites and at worst the loss of employment if occupiers are displaced to locations where such premises/sites are available outside of the region. To some extent this reflects the lack of forward thinking when local authorities have relied on less suitable sites incapable of satisfying the needs of modern occupiers that were highlighted in Section 6.

## 9 Employment Land – Adjoining Boroughs Qualitative and Quantitative Assessment

- 9.1 The Inspector has requested that sites in adjoining boroughs are considered. Each site has been considered on its ability to accommodate a single unit of 13,935 sq. m. This assumes a minimum site area of 3.7 hectares.
- 9.2 Sites capable of accommodating this unit size are therefore considered in the adjoining authorities of Halton, Knowsley, West Lancashire, Wigan and Warrington.
- 9.3 In the table below there is a review of comparable employment sites which are subject to an allocation in an adopted statutory development plan or have a planning permission in place.

<b>Authority</b>	<b>Site</b>	<b>Area</b>	<b>Comment</b>
Wigan	Chaddock Lane, Astley	13.37 ha	Located close to the Manchester conurbation and c 15km from the M6. The site has access through a residential area and is not suited to large scale B8 use. The site serves the west Manchester market.

	South Lincs Industrial Estate	34.01 ha	Accessed off j23 – 25 M6. A large site with a long-term allocation. The site requires a new bypass route before large scale B8 use. The site has land ownership issues. The site is not deliverable in the short term.
	Westwood Park, Wigan	4.8 ha	Accessed off j 25 and 26, M6. The site requires completion of a new access road and is located close to Wigan town centre. It is irregular in shape.
	North Leigh Park	8 ha	Application submitted for housing. The site has poor motorway access and is not suitable for large scale B8 use.
	South of Hindley	12 ha	The site is a long-term strategic site with poor road access through urban areas. The site has poor motorway access and is not suitable for large scale B8 use.

	East of Atherton	9 ha	The site has poor road access, is distant from the motorway network. The site is not suitable for large scale B8 use.
	Landgate, Bryn	5.51 ha	Accessed off j23 – j25, M6. Poor micro access through a residential scheme. Not suitable for large scale B8 use.
Knowsley	K800	14.98 ha	Accessed off j 4/5 M57. The site has a detailed planning consent, the developer is in detailed negotiations with a single occupier. The site can accommodate a building of up to 74,520 sq. m and has a large power supply. The site is too far from the subject site to be direct competition as its focus is the Mersey conurbation.
	Halsnead Garden Village Extension/ Cronton Colliery	22.5 ha	Accessed off j6, M62/j1, M57. Planning has been submitted for part of the site for employment use. The site is too far from the subject site to be competition.

Halton	Gorse Point Gorse Lane, Widnes	17.9 ha	Accessed off j7, M62 (3.5 miles) or j12 M56 (5 miles). A consented site for 74,520 sq. m. The site has poor motorway access and is distant from the motorway. The site is too far from Parkside to be competition.
	HBC Fields, Gorse Lane, Widnes	11.09 ha	The site is in close proximity to Gorse Point and is allocated for employment use. The site is too far from Parkside to be competition.
	Liberty Park, Widnes.	7 ha	Accessed of j9, M62 via the A5300 Knowsley Expressway. The site is part built out with a 10,042 sq. m unit and can accommodate a unit of up to 33,476 sq. m. The site is too far from Parkside to be competition.

	Viking Park, Widnes	15 ha	Accessed off j7, M62 or j12, M56. 18 ha have been developed for a biomass plant and distribution unit. The site adjoins a rail-freight terminal. The site can accommodate a unit of up to c 18,580 sq. m. The site has poor motorway access and is too far from Parkside to be competition.
Warrington	Fiddlers Ferry Power Station	330 ha	The former power station site will need to be decommissioned and remediated. This will have a long lead in time prior to any redevelopment. The site has poor motorway connectivity and cannot be considered as competition due to road/motorway access and delivery timescales.

West Lancs	G Park, Skelmersdale	17 ha	Accessed of j4, M58 and 5 miles from j26, M6. Available in 3 plots, maximum unit size 23,890 sq. m. The site is too small to accommodate a unit of 27,870 sq. m but can accommodate units of over 13,935 sq. m. It is too far north and has poorer access to the M6 to be competition.
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Table 10

9.4 In summary Table 10 shows that in the boroughs adjacent to St. Helens there is no competition to Parkside. Parkside is uniquely placed with excellent access to the Liverpool City Region and the benefits of Liverpool 2 whilst having access to the M6 and M62. It has excellent access to the major motorways linking Liverpool City Region to the North West region.



## **10 St Helens Council Employment Land – Qualitative and Quantitative Assessment**

- 10.1 Within the St. Helens Council administrative area there are currently no available sites with either an allocation or implementable planning consent capable of accommodating a unit in excess of 13,935 sq. m, or 3.7 hectares which would be the size of the smallest unit/plot at Phase 1 of Parkside
- 10.2 The St. Helens Local Plan Submission Draft at Policy LPA04 states the aim to deliver a minimum of 215.4 hectares between 1st April 2018 and 31st March 2035.
- 10.3 Table 4.1 of the Local Plan Submission Draft lists the allocations for employment development totalling 265.3 hectares as outlined below in Table 11.
- 10.4 The site assessment undertaken by Spawforths submitted with the 2018 planning application is based on a minimum site area of 3.7 hectares with a travel distance of 2.5 km from a motorway intersection to reflect the smallest plot at Parkside. These criteria have been used to assess the plots of land.

10.5 The only sites which fit the two criteria are 1EA Omega South Extension, 6EA Millfield Lane, 5EA land to the West of Haydock Industrial Estate, and 8EA Parkside.

Table 11

<b>LPA Ref*</b>	<b>Site Name*</b>	<b>Indicative Site area (hectares)*</b>	<b>Remaining Area (hectares)</b>	<b>Status / Comments</b>
1EA	Omega South Western Extension, (to meet employment land needs arising in Warrington)	31.22	31.22	The greenfield site is to the west of Omega South with access from J8 M62. The site was subject to a hybrid planning application for 205,500 sqm. It is proposed that there will be a 30% B2 (Manufacturing)/70% B8 (Logistics) split within this total floorspace. The application site is in the Green Belt, but it includes part emerging employment allocation (31.22 ha) and part retained

LPA Ref*	Site Name*	Indicative Site area (hectares)*	Remaining Area (hectares)	Status / Comments
				Green Belt site. Total 75.43 ha. There was a resolution to grant consent on 27 <sup>th</sup> October 2020 subject to referral to the Secretary of State. The site is regarded as Warrington BC employment land.
2EA	Florida Farm North, Slag Lane, Haydock	36.67	0	Built out for occupiers - Amazon and Kellogg's. Remaining plot too small to be considered.
3EA	Land North of Penny Lane, Haydock	11.05 ha	2.65 ha	The site is located adjacent to j23, M6. The main plot has been built out for Movianto, the smaller plot is available for a unit of up to 11,689 sq.m.

LPA Ref*	Site Name*	Indicative Site area (hectares)*	Remaining Area (hectares)	Status / Comments
				2.65 ha remains available – too small to be considered.
4EA	Land South of Penny Lane, Haydock	2.16	2.16	Too small to be considered.
5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	7.75	A greenfield site which adjoins site 6EA and existing units on Haydock Industrial Estate. Access to the site from j23 or j24 M6 (j24 is only northbound on /southbound off. Micro access is through an industrial estate with on road parking. The site area is irregular in shape.

<b>LPA Ref*</b>	<b>Site Name*</b>	<b>Indicative Site area (hectares)*</b>	<b>Remaining Area (hectares)</b>	<b>Status / Comments</b>
				Planning consent was refused in 2019
6EA	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	20.58	20.58	A greenfield site adjacent to 5EA forming the infill between Liverpool Rd, Florida Farm Nth and Haydock Industrial Estate. Access is the same as 5EA.
7EA	Parkside East, Newton-le-Willows	64.55	See Policy LPA10*	The site is allocated for a Strategic Rail Freight Interchange and will need considerable investment prior to being brought forward into employment use.

<b>LPA Ref*</b>	<b>Site Name*</b>	<b>Indicative Site area (hectares)*</b>	<b>Remaining Area (hectares)</b>	<b>Status / Comments</b>
8EA	Parkside West, Newton-le-Willows	79.57	79.57	<p>A part brownfield/part greenfield site. The subject site will be accessed off j22, M6 and j9, M62.</p> <p>Parkside Phase 1 (47.90 ha) is subject to the Call-In Inquiry.</p> <p>Part of site (27.67 ha) comprises Parkside Phase 2, which will require a new access road.</p>
9EA	Land to the West of Sandwash Close, Rainford	6.96	6.96	<p>Secondary location with poor access. 11.2km from J23 M6 and 10.6km from the A580/M57 intersection.</p>

<b>LPA Ref*</b>	<b>Site Name*</b>	<b>Indicative Site area (hectares)*</b>	<b>Remaining Area (hectares)</b>	<b>Status / Comments</b>
10EA	Land at Lea Green Farm West, Thatto Heath	3.84	0	Built out by Network Space as Mere Grange for a number of smaller industrial units.
11EA	Gerards Park, College Street, St. Helens	0.95	0.95	Too small to be considered.
<b>TOTAL</b>		<b>265.3</b>		

\*(St Helens Submission Draft Local Plan Jan 2019)

- 10.6 All the developments that have been undertaken have had excellent motorway access and the two larger sites (2EA and 3EA) have both been developed for large floorplate requirements.
- 10.7 All available sites are greenfield with the exception of Parkside West, the subject site.
- 10.8 The level of interest for large scale floorplates and take up confirm the boroughs excellent motorway access. Qualitatively the two most suitable sites in the table are Parkside and Omega West.

## Quantitative Assessment

- 10.9 From the allocations proposed in the St. Helens Submission Draft Local Plan as outlined in the table above 48.91 hectares in the following sites has been developed in part or as a whole. The 11 proposed sites are not representative of the current land supply.
- 10.10 The take up of employment land from the above sites within the borough is 48.91 hectares. Parkside East is planned as a Strategic Rail Freight Interchange which will target rail related uses, this would reduce the amount of employment land available to the marketplace which is non-rail related and available in the short to medium term.
- 10.11 The take up of land has included 45.07 hectares built out for three large distribution warehouses for Kellogg's 48,865 sq. m, Movianto 35,023 sq. m and Amazon 33,537 sq. m. The remaining 3.84 hectares was built out for a multi-unit scheme totalling 8,384 sq. m in the size range 1,718 – 4,812 sq. m. These locations are listed below.
- 10.12 Plot 2EA - 36.67 ha has already been built out for Kellogg's and Amazon.
- 10.13 Plot 3EA - 8.4 ha has been built out for Movianto with 2.65 ha remaining available
- 10.14 Plot 10EA - 3.84 ha has been built out for a speculative multi-unit scheme
- 10.15 Based on the Council's target employment land supply of 215.4 hectares in the Local Plan Submission Draft, 48.91 hectares of the proposed supply has already been developed between 2017 and 2019. This represents 23% of the Council's employment land supply for the period 2018 – 2035. This would result in a residual supply of 166.49 hectares



- 10.16 If the total employment land supply figure of 265.3 hectares in Table 4.1 of the Local Plan Submission Draft is used the take up equates to 18% of the total supply for the period 2018 – 2035. The residual supply would be 216.39 hectares.
- 10.17 The two residual supply totals would be able to satisfy an annual take up of between 11.1 hectares or 14.43 hectares per annum.
- 10.18 The Omega West land allocation (31.22 ha) needs to be removed from this as it is an allocation for Warrington Borough Council. This would reduce the supply to 185.17 ha based on a gross supply of 265.3 ha (as Table 11) or 12.35 ha per annum.
- 10.19 Omega West has a resolution to grant consent and if validated will provide 75.43 ha of employment land. 35.91 ha will be removed from the land supply by the disposal to TJ Morris for an 81,570 sq. m distribution facility but an additional 39.52 hectares will be released from the Green Belt. This whole area should be regarded as a Warrington Borough Council employment allocation.
- 10.20 In summary the subject site at Parkside West is the only part brownfield site being promoted in the local plan. 45.07 hectares of the Draft Local Plan allocations within the borough which are capable of accommodating large floorplate buildings have been built out. Assuming planning consent is granted at Omega West site this will remove 31.22 ha of employment land from the St. Helens allocation as the Omega West land is being assessed as Warrington BC employment land supply and should be discounted from the St. Helens supply.
- 10.21 On this basis the borough does not have any large sites capable of immediate development for distribution use in an accessible location unless planning permission is granted at Parkside.

## 11 Logistics Study

### Model Logic Report

11.1 Model Logic a supply chain and logistics consultancy were commissioned to prepare a logistics study to assess the locational characteristics of the Parkside site based on operator and user requirements for an effective distribution network as compared to real estate requirement. The report is attached at Appendix Three.

There is an area of crossover in resolving the location of the facility as similar factors affect both the commercial and real estate element of choosing a suitable site / facility.

Operations want to configure a network of facilities of the correct size in the right locations.

11.2 Model Logic have analysed the Parkside sites theoretical performance against other sites based on the parameters at page 5 of the report. They have also analysed the site as part of a national network based on a 90-minute drive time, based on a seven or eight warehouse network, including Parkside there would be 90.2 to 91.5% coverage of the population.

11.3 Given the need to reduce the carbon footprint, the site has also been considered on a 45-minute stem time using electric vehicles (EVs). This is considered the ideal practical working day for a driver of 9.5 hours within the logistics.

Based on this analysis, the map at page 13 of the report shows the area that can be served within the 45-minute drive time.

11.4 The table on page 14 of the report shows that Parkside has the fourth largest catchment area when assessed against competing sites.

When compared against other motorway junctions Junction 22(Parkside) has the joint second largest population in the region (page 15) out of 19 junctions.

When considering the drive time between 30-120 minutes, the site is ranked sixth out of the 23 competing sites and by motorway junction ranks fifth.

11.5 The report considers transport from the key deep-water port locations, based on the regional distribution network of eight RDC's. The table at page 20 highlights that Liverpool has lowest road-based cost through which to bring imported goods. The benefit of this on cost and carbon footprint could therefore have a positive impact on the NW and Parkside as a logistics location.

11.6 The report concludes that:

- Parkside's location close to the centre of the North West's motorway network enables it to cover a large drive time area, serving a large population including Liverpool, Manchester and Warrington.
- Parkside is an optimal location to form part of a national network of RDC's, it can also operate as a local or last mile distribution site and can operate electric vehicles effectively from the location
- Parkside has excellent access to Liverpool 2 docks. Liverpool 2 has the minimum road transport costs of any of the main UK ports.
- Parkside has a large catchment area from which to recruit labour.

11.7 The report highlights the site's suitability from an operational rather than a real estate perspective. Model Logistics conclusion is that the site performs well for both local and regional transport.

## 12 Subject Site

- 12.1 The subject site has been assessed on the criteria for large scale development discussed on Section 7. The Parkside site satisfies the criteria as discussed below.
- 12.2 Large footprint – Parkside can offer three development plots, the indicative masterplan shows units of 52,024 sq. m, 21,544 sq. m and 19,123 sq. m. The site can offer a range of units that are in demand to satisfy the regional market.
- 12.3 Physical characteristics –
- the topography/shape of the site does not prevent its development
  - there is an adequate timescale to provide utility/service provision to the site
  - the site is part brownfield/part greenfield and has no physical barriers to development.
  - The site can be operated on a 24/7 basis
- 12.4 Motorway/strategic road access - Parkside has access to j22 M6 and j9 M62 via the A49. The M6 and M62 are the main trunking motorways in the north west for logistics. Parkside’s location provides excellent access to the Liverpool City Region, Liverpool 2 docks, Warrington and the Greater Manchester conurbation.
- 12.5 Land ownership – the site is in the control of the developer.
- 12.6 Deliverability – the site has no impediments on delivering distribution units to the market.

- 12.7 Labour supply – the areas demographics provide a large catchment area as supported in the Model Logic report discussed in Section 8, and Parkside Phase 1 Socio-Economic Support Document (Nov 2020).
- 12.8 In summary Parkside satisfies all the criteria for large scale floorplate development.

## 13 Conclusions

- 13.1 The national and regional distribution markets are subject to high levels of demand brought about by the change in shopping habits. This has been accelerated with the impact of Covid 19.
- 13.2 The current supply of Grade A buildings in the North West is 168,541 sq. m in 10 units. This represents 10- or 9-months' supply based on the five- and ten-year average take up respectively. If the units that are under offer are let this will reduce the supply to 8- or 7-months' supply.
- 13.3 In the North West there are 50 requirements in excess of 9,292 sq. m with a total size range of 1.043m sq. m to 1.341m sq. m. There are 20 requirements where the search parameters are 27,870 sq. m or over totalling 826,810 sq. m (this includes the TJ Morris requirement where planning consent has been granted at Omega West).
- 13.4 Eleven of these requirements are focussed on the Greater Warrington market area this equates to a floor area requirement of 501,660 sq. m. This confirms the imbalance between supply and demand.
- 13.5 There are 5 sites in the adjoining boroughs capable of accommodating a unit with a 27,8780 sq. m floorplate. In relation to the Parkside the sites are in geographically diverse locations and can be discounted in terms of location, the sites are therefore not competition to Parkside.
- 13.6 There is a shortage of deliverable sites in the North West and specifically along the M6 corridor in the Warrington/St. Helens area. This is having an adverse effect on occupiers who are now in the situation where the available supply and pipeline are severely restricted. This will depress demand as companies will have to consider relocating part or all of their business to an alternative location where there is a suitable building/site or greater supply.

- 13.7 Market failure will occur. This has been brought about by a number of factors which include - local authorities not being able to bring sites through the employment allocation process/local plan quickly enough in relation to employment land take up, the change in market requirements outpacing local plans and a reliance on older employment sites which could never satisfy modern occupier requirements.
- 13.8 Over 652,462 sq. m of predominantly logistics floorspace has been developed in the Greater Warrington sub-market area since 2011. This confirms the suitability of the location for logistics and the change in the size and specification of occupier requirements.
- 13.9 The market for the subject site is focussed on the wider Warrington market predominantly along the M6 corridor between junctions 20 – 25. Parkside benefits from access to junction 22 of the M6 and junction 9, M62 and is located close to the M6/M62 intersection. This confirms it has a strong locational advantage for M6/M62 corridor focussed enquiries.
- 13.10 The changing logistics requirements are driving a need for larger, taller distribution units to enable automation. This requires larger regular shaped sites with good motorway access capable of accommodating unit sizes from 27,870 sq., m. Parkside can offer a number of plots; the largest plot can accommodate a single unit of up to 52,024 sq. m.
- 13.11 The Model Logic report confirms from a logistics perspective that the site is a strong location for a regional distribution centre. It is ranked joint second in terms of access to the largest population density by motorway junction. The report highlights the proximity to Liverpool 2 and the cost effectiveness of importing goods through this location.

- 13.12 The sites location enables access to the Liverpool and Manchester conurbations for last mile delivery and can support the use of electric delivery vehicles to undertake this.
- 13.13 Distribution companies still need access to a large labour pool, Parkside can offer a plentiful labour supply within its catchment area and logistics offers a range of jobs with a higher than average salary.
- 13.14 The St Helens Local Plan Submission Draft references 11 sites totalling 265.3 hectares for the plan period 2018 – 2035. Four sites have been developed comprising 48.91 hectares. 79.57 hectares are reserved for a Strategic Rail Freight Interchange. There are only three remaining sites including Parkside which are capable of accommodating a unit of 27,870 sq. m or above. Parkside is the only part brownfield site.
- 13.15 There are currently four sites being considered in the Call-In. The sites would provide an additional 452,423 sq. m of supply to the marketplace. Given the imbalance between supply and demand and the timescale for delivery of the sites this would not create an oversupply of employment land.
- 13.16 In summary the North West has an extremely limited supply of available buildings and land capable of delivering modern logistics facilities with motorway access. Parkside can offer large scale development plots deliverable in an acceptable timescale in close proximity to the M6 and M62, in a location that has proved attractive to the logistics sector. There are currently no plots immediately deliverable within the surrounding area. If the planning consent is withdrawn this will have a major impact on site availability for the expanding logistics sector in St. Helens and the North West.



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Junction 10

**APPENDICES TO**

**PROOF OF EVIDENCE OF ANDREW PEXTON IN RELATION TO NEED AND  
DEMAND FOR EMPLOYMENT LAND AND PREMISES**

**FOR**

**PARKSIDE REGENERATION LLP RELATING TO THE CALLED-IN  
PLANNING APPLICATION FOR THE FORMER PARKSIDE COLLIERY,  
PHASE 1, WINWICK ROAD, NEWTON LE WILLOWS**

**LOCAL PLANNING AUTHORITY REFERENCE: P/2018/0048/OUP**

**SECRETARY OF STATES REF: PCU/CONS/H4315/324468**

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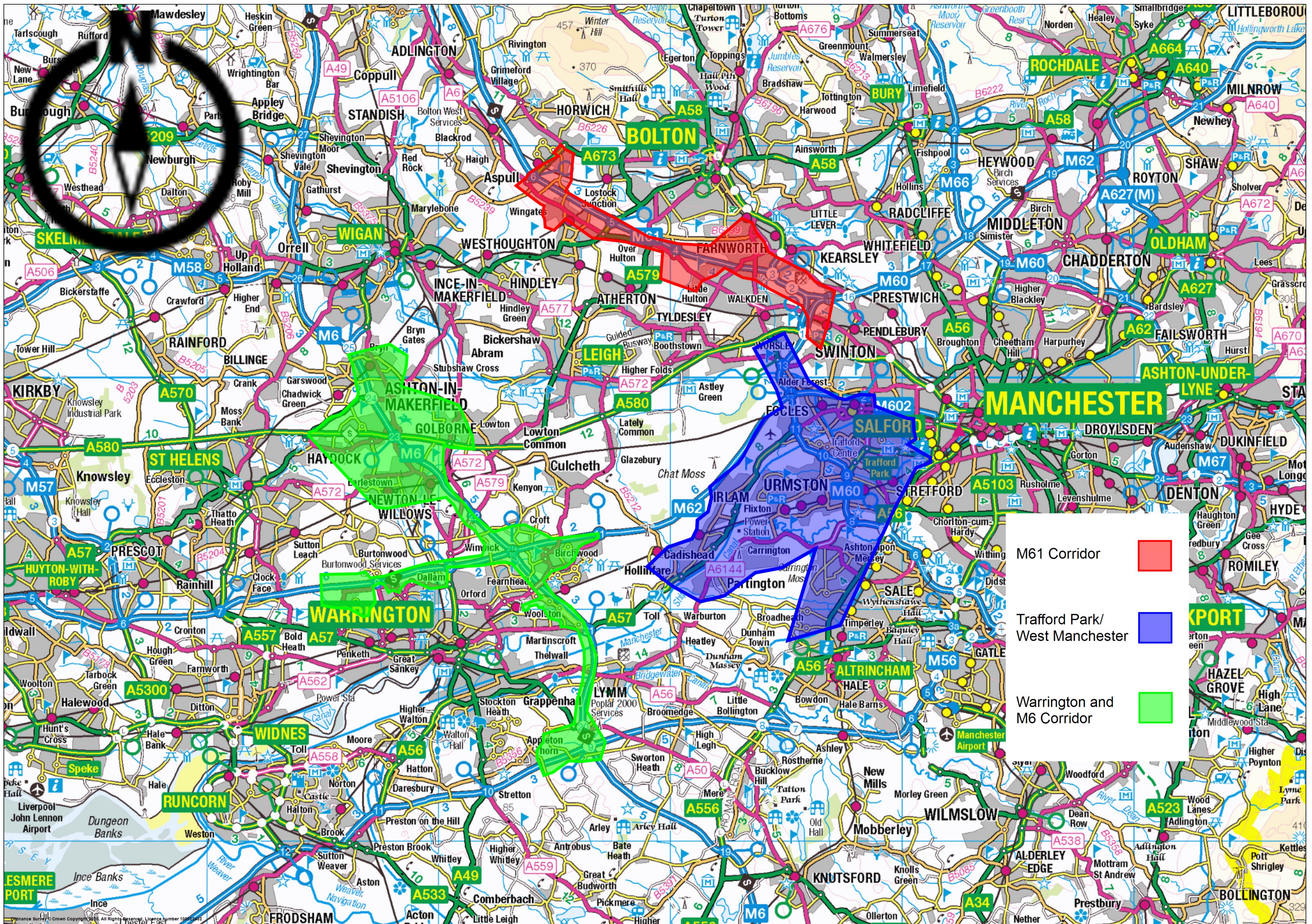
**TOWN AND COUNTRY PLANNING ACT 1990 SECTION 77**

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT  
PROCEDURE) (ENGLAND) ORDER 2015**

**TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND)  
RULES 2000**

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**APPENDIX ONE - MARKET SECTORS MAP**



M61 Corridor

Trafford Park/  
West Manchester

Warrington and  
M6 Corridor

## **APPENDIX TWO - TAKE UP, SUPPLY AND REQUIREMENTS**

## Appendix Two: Grade A Take Up

Annual Grade A Take Up 2011 – 2020 (agreed by all witnesses Oct 2020)

Year	Sq.m	Sq.ft (million)
2011	292,263	3.146
2012	110,830	1.193
2013	311,566	3.354
2014	225,747	2.43
2015	327,608	3.52
2016	279,556	3.009
2017	119,058	1.282
2018	253,245	2.726
2019	139,967	1.506
2020	257,578*	2.772*
Total	2,316,526	24.94

\*this figure excludes the letting to Jungheinrich of Unit 3 Mountpark Omega Warrington I 17,222, the revised figure should be 274,786 sq m (2,957,868 sq ft).

Grade A is defined as

- Minimum 9,292 sq m unit size
- Minimum 10 m eaves
- Units less than approximately 20 years old

## Availability

<b>Under Construction</b>	<b>Sq. m</b>
Unit 2 Mountpark Omega, Warrington Phase 2	18,875
PLP Ellesmere Port	12,820
<b>Total</b>	<b>31,695</b>
<b>Existing Speculative Build</b>	
Venus 217, Knowsley Industrial Estate	20,230
Kingsway 216, Kingsway Business Park, Rochdale	20,104
F2/G Multiply Logistics North, Bolton	13,860
H2 Heywood Distribution Park, Heywood ( <i>under offer 24.11.20</i> )	13,829
Academy, Knowsley	10,219
Liberty Park, Widnes	10,042
<b>Total</b>	<b>88,284</b>
<b>Existing Buildings</b>	
L175, Liverpool	16,357
Martland 350, Wigan	32,205
<b>Total</b>	<b>48,562</b>

## Availability

Type	No. of Units	
Units under construction	2	31,695 sq. m.
New speculative build	6	88,284 sq. m.
Existing Grade A units	2	48,562 sq. m
<b>Total</b>	<b>10</b>	<b>168,541 sq. m</b>



## Appendix Two: Current Requirements

<b>Occupier/Agent</b>	<b>Min Size</b>	<b>Max Size</b>	<b>Area</b>
TJ Morris	83,610	83,610	M6/Liverpool
Eddie Stobart	60,385	60,385	M6
Colliers	55,740	55,740	Greater Manchester
JLL	32,515	46,450	M6
LSH	46,450	46,450	NW
3PLRE	41,805	46,450	Greater Manchester
Kinney Green	37,160	46,450	Liverpool + 30 miles
Savills	37,160	46,450	North
Mason Owen	37,160	46,450	Merseyside M6 corridor
Vail Williams	32,515	37,160	Wigan
CBRE	32,515	37,160	North Manchester
Savills	27,870	27,870	20 miles of Crewe
JLL	27,870	27,870	M6 Middlewich to Warrington
CBRE	18,580	37,160	Greater Manchester
RGD Consulting	23,225	32,515	15 mile radius of Warrington
Avison Young	18,580	32,515	North Manchester
Savills	32,515	32,515	Greater Manchester
Gerald Eve	16,722	27,870	Greater Manchester
Legat Owen	9,290	27,870	M56 Corridor
C&W	18,580	27,870	Greater Manchester
Aherne Consult	18,580	27,870	M6 north
Savills	9,290	23,225	Lancs/Cheshire/Staffs
Burbage Realty	23,225	23,225	Within Wigan.
JLL	13,535	23,225	Manchester & surrounds
Montagu Evans	13,535	23,225	Liverpool to Manchester and Leeds
Cushman & Wakefield	16,257	20,902	Skelmersdale and surrounds
DTRE	9,292	18,580	Merseyside with good access to Port of Liverpool
CBRE	9,292	18,580	NW (M6/M62 Corridor)
Avison Young	18,580	18,580	Manchester and surrounds
Louch Shacklock	11,148	18,580	Greater Manchester (Wigan/Warrington/Manchester/Rochdale)
Prop Search	9,292	18,580	Manchester + 20 Miles
Savills	13,535	16,257	15 mile radius of Haydock
C & W	11,148	15,793	1 hr drive from Wigan
C & W	13,535	13,535	M6 corridor
Davies Harrison	13,535	13,535	M6 & M1 Corridors north of Nottingham

## Appendix Two: Current Requirements

Avison Young	7,432	13,535	M6 Corridor above J20
Alder King	9,292	13,535	Warrington + 15 Miles
CBRE	8,361	13,535	Greater Manchester
LSH	9,292	13,535	NW
JLL	9,292	13,535	Warrington & 90 minute drive
Vail Williams	7,432	11,148	Within 10 miles of Wigan
Matthews & Goodman	7,432	11,148	A580/M6 Corridor
Christopher Dee	9,292	9,292	Manchester and surrounds
Confidential Occupier	9,292	9,292	Manchester and Surrounds
LSH	4,645	9,292	M6 Manchester and surrounds to Stoke
JLL	9,292	9,292	NW
BCRE	6,503	9,292	NW
Wigan Inward Investment	7,432	9,292	Wigan
Confidential occupier	9,292	9,292	Wigan
<b>Total (sq ft)</b>	<b>1,042,802</b>	<b>1,341,011</b>	

Note all highlighted enquiries are focussed on the Greater Warrington market (Parkside) area.

Enquiries as agreed by witnesses October 2020

## **APPENDIX THREE - MODEL LOGIC LOGISTICS REPORT**

## **Appendix 2 – Model Logic Ltd Six 56 Logistics Study Report**

**Model Logic Ltd**

**Parkside**

**Logistics Study**

**Report**

**August 2020**

# Introduction to the Parkside Logistics Study

## Background

Model Logic has been instructed by Langtree PP to prepare an independent Logistics Study to support the Public Enquiry for the redevelopment of the former Parkside Colliery. The outline application is for the construction of 90,000 sqm of employment space and the creation of a logistics hub. The application also includes the construction of a single carriageway road that would link the A49 Winwick Road to the A579 Winwick Lane, providing a short route to the M6 motorway. This report does not assume that the link road is constructed.

This Study assesses the locational characteristics of the Parkside site and whether this would be an optimal location for a Logistics Park based on operator and end user requirements. In the absence of a named end user for the site at this stage in the planning process, this report has been undertaken to determine an identified need from large scale logistics and distribution end users to operate in this location within the Borough as well as the wider region.

This Study should also be read in conjunction with the Jones Lang LaSalle (JLL) report “Employment, Land and Market Report”

**Model Logic** is a supply chain and logistics consultancy with a 30 year track record of delivering complex strategic supply chain projects to a wide range of Blue Chip organisations across numerous industry sectors – from grocery, food and drink, pharmaceuticals, media and entertainment, through to DIY, building and gardening supplies.

Model Logic offers extensive supply chain knowledge and experience, supported by a range of strategic and operational modelling tools and have worked with a number of Blue Chip Logistics Operators to provide a framework for evaluating optimum locations for their distribution hubs and warehouses.

# Definition of Terms (1)

A **Supply Chain Network** is a configuration of facilities arranged to allow the movement of materials from their source locations to their final customers. A network can take many different forms dependent upon the nature of the company's business, its role in the supply chain and its size. The diagrams below show three alternative networks for a retail company.

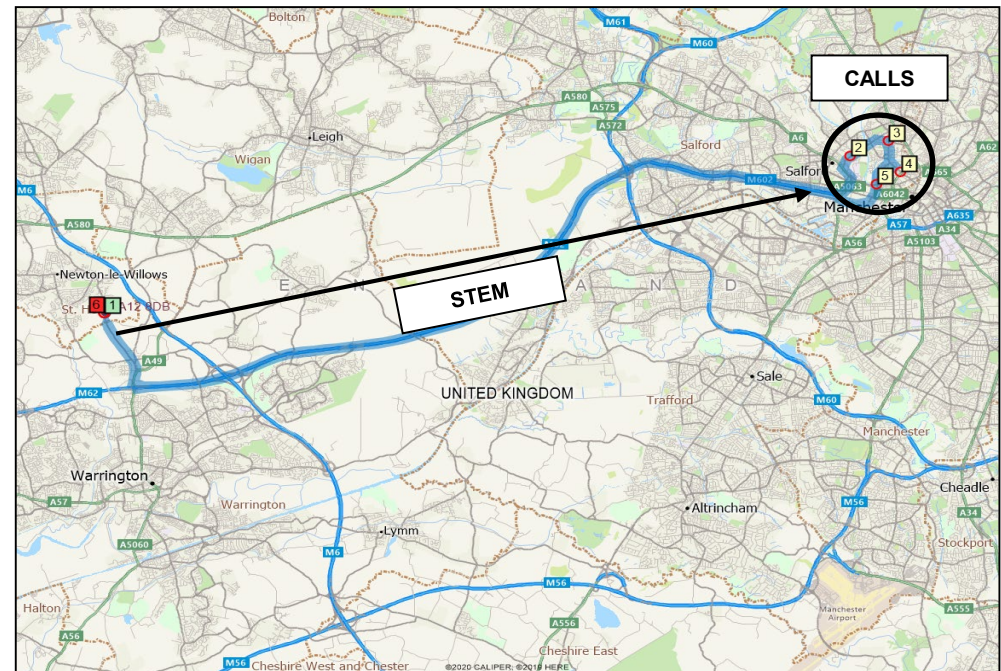
**Network Design** is the process of evaluating alternative configurations of facilities, in terms of their number, size and roles. The design process is usually supported by using computer models together with digital maps and road networks to evaluate a range of options. The objective of the modelling has historically been to identify the minimum cost network, but can be extended to include other parameters including service level and carbon footprint.



Example Retail Network Configurations

## Definition of Terms (2)

A transport route can be described as a combination of a **Stem** element and a series of **Calls** (petal element). In the example, a vehicle is planned to travel from Parkside to make four calls in the Salford area. The distance from the start to the first call is described as the **Stem Distance** and the time to travel is the **Stem Time**. The distance between each of the calls is described as the **Inter-drop Distance** and the time between calls is the **Inter-drop Time**.



An **Import Centre** is a facility, usually a warehouse, where goods are received from a port or an airport. Goods are received in bulk form, typically by container or airline unit load device (ULD). The containers or ULDs are emptied (de-stuffed) and the products are either re-stacked onto pallets or fed into an automated storage system. The Import Centre either supplies directly to end customers or feeds a number of regional or local warehouses across the country. An **Export Centre** is a facility that prepares goods for export and involves filling (stuffing) containers or airline ULDs.



# Introduction to Network Design and Warehouse Location

This report has been prepared through the eyes of an end user or operator who may be a retailer, manufacturer, wholesaler or service provider and identifies the steps taken by these operators when undertaking a search to identify an optimum location. A third party logistics company may be contracted to operate a specific site, however the principles of network design will still apply. Designing an effective distribution network is one of the key elements of an end user's sustainability strategy. Configuring a network of warehouses of the correct size in their ideal locations determines the efficiency of transport routes both of a primary and secondary nature. Locating warehouses in the wrong configuration can lead to inefficient routes and incurring excess mileage and carbon usage.

Although the shape and size of an operator's network will vary dependent upon the nature and size of the business, the principles of network design remain the same. A range of parameters are included within an analysis, including:

- Location and demand of customers, either Business-to-Consumer (B2C) or Business-to-Business (B2B)
- Required service offering to customers in terms of supply lead time
- Source location of products together with their characteristics in terms of size, weight, stock levels and value
- Primary and secondary transport parameters, including vehicle capacities and operating costs
- Warehouse parameters, in terms of size, operating methods and costs, both development and operational
- Motorways, regional and local road network, including road speeds
- Availability of local labour and ease of travel to work

To evaluate the ideal network for an end user it is usual to construct a network computer model of the supply chain which takes into account all of the parameters described above. Where the location and sizing of new facilities is being evaluated the model will provide a ranking of possible locations based upon the required balance between service, cost and sustainability. The ranking can be categorised into gold, silver and bronze locations in order to provide a brief to commercial agents to undertake a search.

Evaluating the potential of specific development sites in order to attract end users turns the objective of the exercise on its head. The question becomes how well suited is the location and size of the site to synchronise with the network strategies of a range of end users. The methodology used in this report is to analyse the theoretical performance of the Parkside site against other locations using end user objectives as a guide.

# Parkside Location and Motorway Links

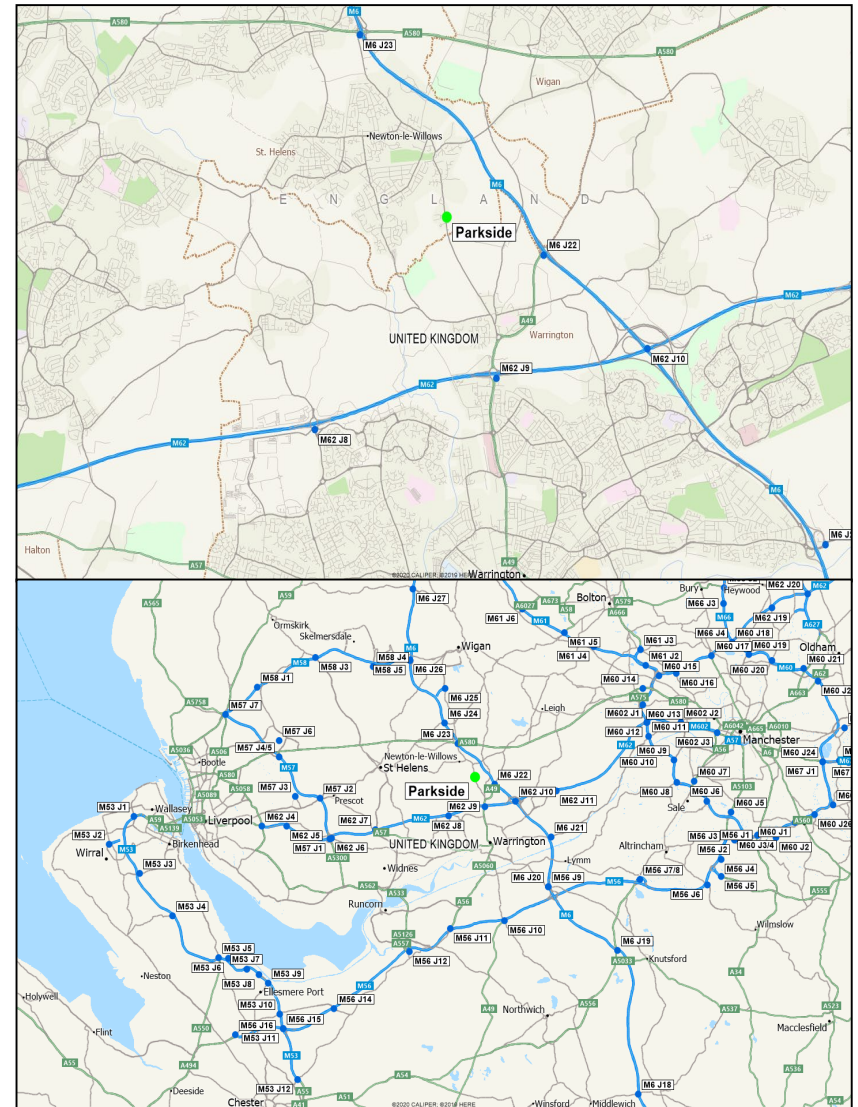
Parkside (postcode WA12 8DB) is situated in a prime location to service the North West (NW) of England. Parkside is located to the east of the town of St Helens and to the north of Warrington, and between the cities of Liverpool and Manchester (approximately 19 miles and 17 miles respectively). It is also located approximately 19 miles from Manchester Airport and 24 miles from Liverpool Port.

The site is currently linked by the A49 to M6 Motorway Junction 23 in the north, M6 Motorway Junction 22 to the east and M62 Motorway Junction 9 in the south. The drive times to each junction from Parkside are estimated to be:

- M6 Motorway Junction 22 – 5 minutes
- M6 Motorway Junction 23 – 5 minutes
- M62 Motorway Junction 9 – 4 minutes

As part of the plans for development, St Helens Council has brought forward plans for a Parkside Link Road (PLR) linking the A49 to an improved Junction 22 of the M6. This report does not assume the PLR is constructed.

The M6 Motorway running north-south to the east of the Site, provide links to Lancashire, Staffordshire and Greater Manchester, as well as the M62 Motorway at Junction 22A of the M6 Motorway to the north, which provides links east-west to Liverpool, Greater Manchester and Yorkshire.



# Parkside Location and Population Centres

The Drive Time to Population Centres Table shows the population by postcode area (PCA), ranked by the closest PCA. This shows that within a 1 hour drive time a population of over 7.5 million can be reached and within 2 hours the catchment is 21.3 million (based upon the latest 2011 census).

The NW has a dense network of connected motorways which means that a high proportion of business journeys over 10 miles will involve using a motorway. This is reflected in the large area that can be covered within a drive time zone of 45 mins or one hour. Given the high population densities of Liverpool, Manchester, St Helens and Warrington the drive time area yields an attractive local customer base for business development.

Drive Time to Population Centres					
Postcode Area (PCA)	Postcode Area Name	Population	Distance from Parkside (miles)	Time from Parkside (mins)	Cumulative Population
WA	Warrington	616,482	4	11	616,482
WN	Wigan	309,156	8	13	925,638
M	Manchester	1,167,414	17	24	2,093,052
L	Liverpool	856,675	19	29	2,949,727
BL	Bolton	379,929	21	31	3,329,656
PR	Preston	520,366	26	31	3,850,022
SK	Stockport	603,540	29	34	4,453,562
CW	Crewe	309,487	29	36	4,763,049
BB	Blackburn	488,564	38	39	5,251,613
CH	Chester	659,880	36	40	5,911,493
OL	Oldham	462,590	29	40	6,374,083
FY	Blackpool	276,593	44	50	6,650,676
ST	Stoke-on-Trent	644,416	45	52	7,295,092
HX	Halifax	160,137	43	59	7,455,229
HD	Huddersfield	262,843	44	60	7,718,072
WF	Wakefield	512,784	62	72	8,230,856
LS	Leeds	774,677	60	72	9,005,533
BD	Bradford	578,374	56	76	9,583,907
LA	Lancaster	328,926	74	78	9,912,833
WS	Walsall	449,728	75	81	10,362,561
TF	Telford	212,536	67	84	10,575,097
DE	Derby	730,125	77	85	11,305,222
LL	Llandudno	537,252	75	87	11,842,474
WV	Wolverhampton	396,187	74	89	12,238,661
S	Sheffield	1,358,186	84	93	13,596,847
SY	Shrewsbury	341,952	78	94	13,938,799
B	Birmingham	1,904,293	86	95	15,843,092
HG	Harrogate	138,214	90	101	15,981,306
DY	Dudley	410,847	87	108	16,392,153
YO	York	562,761	99	109	16,954,914
CA	Carlisle	318,114	111	112	17,273,028
LE	Leicester	985,352	102	113	18,258,380
DN	Doncaster	756,058	103	114	19,014,438
CV	Coventry	821,033	105	116	19,835,471
WR	Worcester	287,838	106	116	20,123,309
NG	Nottingham	1,163,617	101	120	21,286,926

# Principles of Drive Time Analysis

## Digital Maps and the Road Network

Digital maps, including the latest road network have been used to calculate the distances and travel times between selected points.

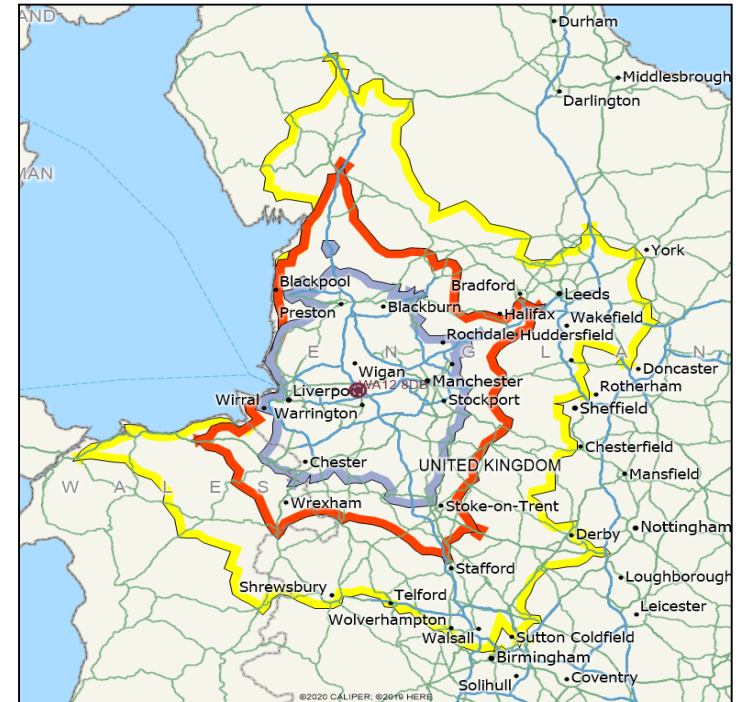
## Population Data

Where information on specific end users' business isn't available the most robust method of analysis is to use population as an indicator of consumer or customer demand. The last national census took place in 2011 and this information is used as the basis of analysis. In addition to population the census data that has been used also includes the number of households and the weekly income per household.

## Drive Time Analysis

A key aspect of using digital maps is the ability to undertake drive time analysis which creates drive time zones from a selected start point. The shapes of the zones that are created depend upon where the roads are located and the driving speeds for the different road types. There can be a choice of whether the quickest or shortest route is taken. For this Study the quickest route is used.

Once the drive time zone has been established it is then possible to summarise the population characteristics within it and also calculate its area, in square miles.



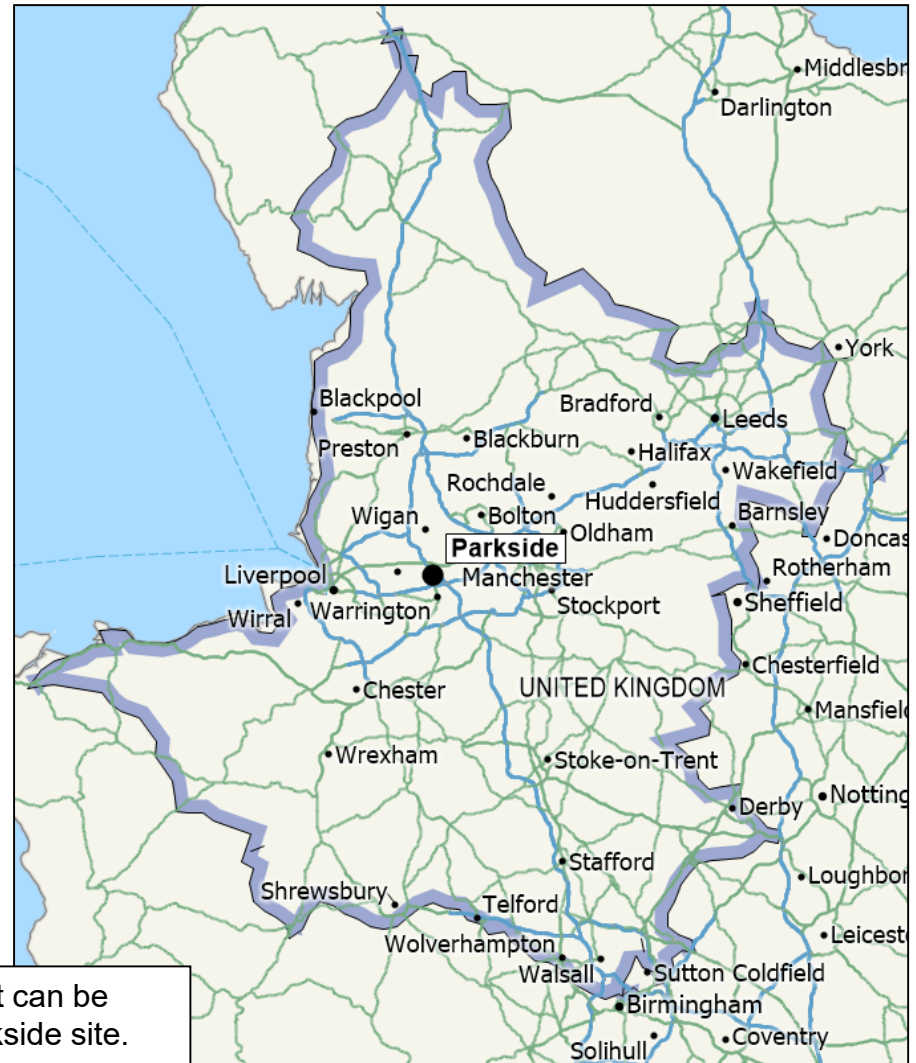
The map shows the boundaries of the zones that can be reached within 45, 60 and 90 minutes drive from the Parkside site. Based upon average drive speeds.

# Parkside – 90 mins Drive Time Zone

## Regional Warehouse

A 90 minutes stem drive time is a useful guide for a warehouse that is to have regional coverage. Typically a large retailer or wholesaler may have seven to ten regional sites covering the UK.

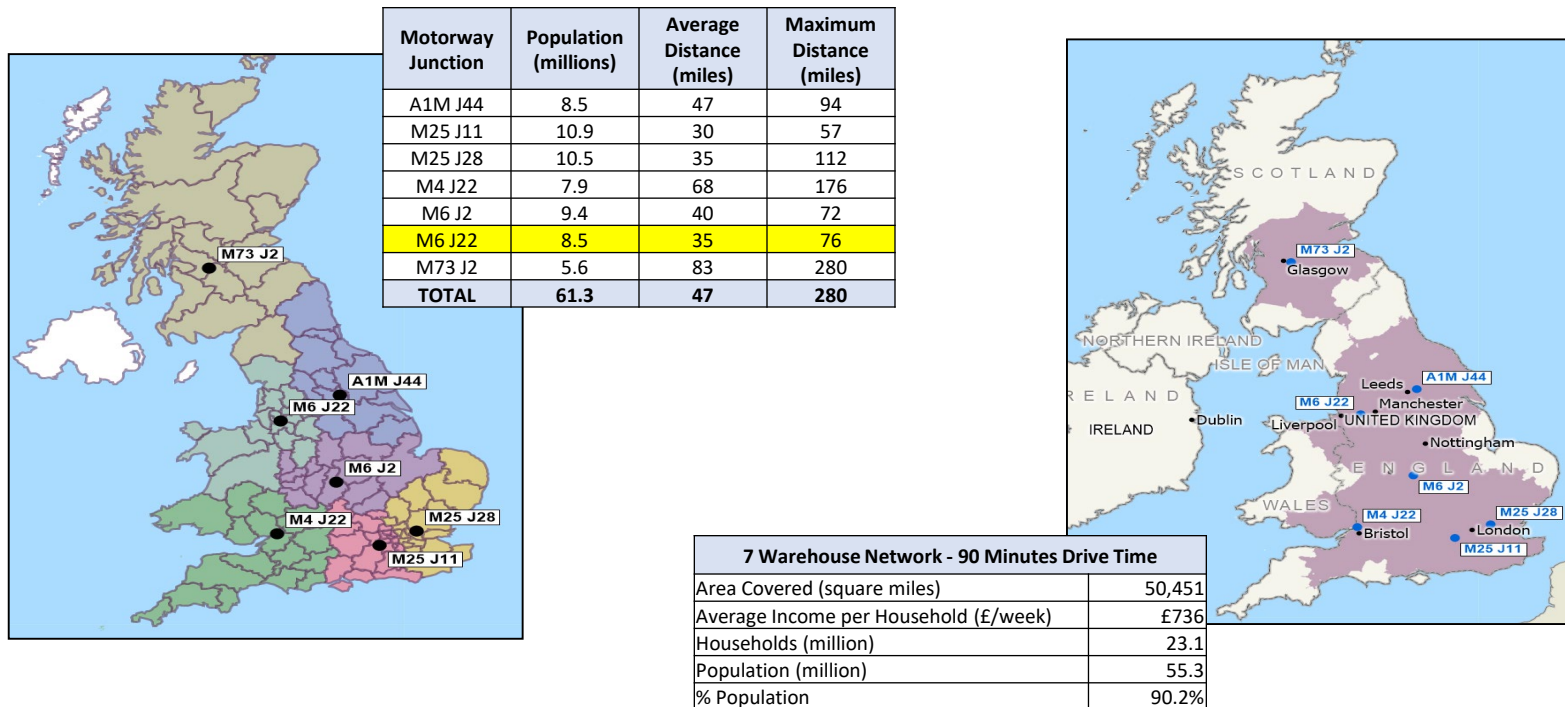
The following sections show the results of using a computer network model to identify the ideal combination of seven and eight warehouses so as to minimise the total distance travelled to centres of population.



The map shows the boundary of the zone that can be reached within 90 minutes drive from the Parkside site. Based upon average drive speeds.

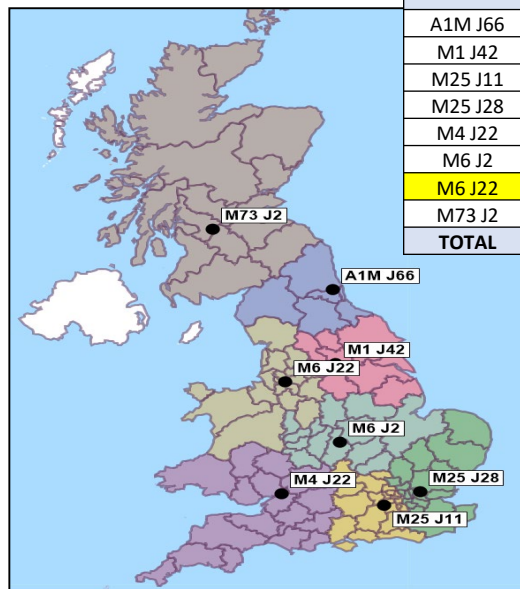
# Regional Analysis – 7 Warehouse Network

Using a database of all of the motorway junctions in Britain, a network model was used to identify the best combination of seven junctions that minimised the total travel distance to each postcode area, weighted by population. The results of the analysis are shown in the map below, which shows the optimum combination of seven sites located at motorway junctions with the coloured territories that they would serve. The table shows the motorway junctions selected, the population allocated to each site, together with the average and maximum distance to customers. This highlights that the motorway junction M6 J22 features in an optimum eight warehouse network. The second map shows the territory that can be covered from these locations based upon a 90 minutes drive time, indicating that 90.2% of the population can be reached in this time frame.

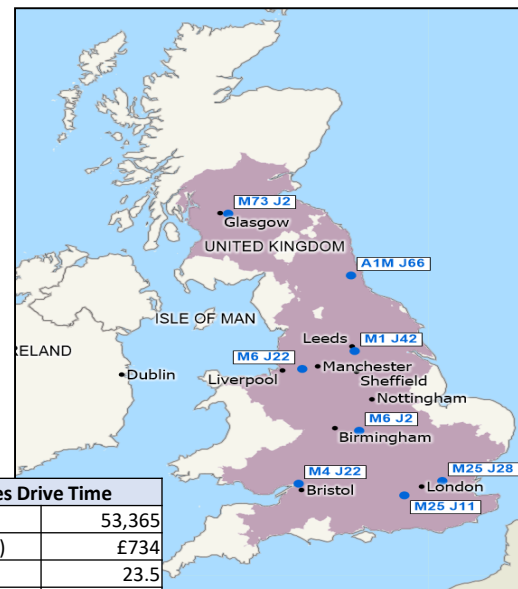


# Regional Analysis – 8 Warehouse Network

Using a database of all of the motorway junctions in Britain, a network model was used to identify the best combination of eight junctions that minimised the total travel distance to each postcode area, weighted by population. The results of the analysis are shown in the map below, which shows the optimum combination of eight sites located at motorway junctions with the coloured territories that they would serve. The table shows the motorway junctions selected, the population allocated to each site, together with the average and maximum distance to customers. This highlights that the motorway junction M6 J22 features in an optimum seven warehouse network. The second map shows the territory that can be covered from these locations based upon a 90 minutes drive time, indicating that 91.5% of the population can be reached in this time frame.



Motorway Junction	Population (millions)	Average Distance (miles)	Maximum Distance (miles)
A1M J66	3.0	30	78
M1 J42	5.8	32	74
M25 J11	10.9	30	57
M25 J28	10.5	35	112
M4 J22	7.9	68	176
M6 J2	9.4	40	72
<b>M6 J22</b>	<b>8.5</b>	<b>35</b>	<b>76</b>
M73 J2	5.3	81	280
<b>TOTAL</b>	<b>61.3</b>	<b>44</b>	<b>280</b>



8 Warehouse Network - 90 Minutes Drive Time	
Area Covered (square miles)	53,365
Average Income per Household (£/week)	£734
Households (million)	23.5
Population (million)	56.1
% Population	91.5%

# Why use 45 minutes for the Drive Time for Local Analysis?

In order to emphasise the green credentials of the Parkside site it is assumed that local deliveries are made using Electric Vehicles (EVs). The use of EVs is not a pre-requirement for undertaking local deliveries but a desire to reduce the site's carbon footprint.

EVs currently have a maximum driving distance of 110 miles, which could be less in cold weather. From a sample of routes the average speed for the stem element of the delivery route is approximately 47 mph (see table Sample Stem Journeys from Parkside).

Using the route parameters for a typical local delivery operation (eg grocery home delivery) the ideal stem time is 45 minutes (see table Typical Local Delivery Route), which provides a practical working day for the driver of 9.5 hours. Increasing the stem drive time to 60 minutes reduces the effective time for making deliveries and produces a working day of only 5.25 hours.

Based upon this high level analysis, the 45 minutes stem time is deemed as the best basis for comparing catchment areas for siting a local delivery facility within the vicinity of Parkside.

Sample Stem Journeys from Parkside				
From	To	Distance (miles)	Time (mins)	Speed (mph)
Parkside	Altrincham	18.2	24	46
Parkside	Blackburn	32.6	39	50
Parkside	Blackpool	44.5	51	52
Parkside	Bootle	22.9	31	44
Parkside	Burnley	41.3	45	55
Parkside	Flint	40.2	45	54
Parkside	Liverpool Centre	16.9	24	42
Parkside	Manchester Centre	25.5	32	48
Parkside	Oldham	32.7	46	43
Parkside	Sefton	26.2	34	46
Parkside	Stockport	29.4	38	46
Parkside	Stoke-on-Trent	42.2	50	51
Parkside	Wallasey	23.1	38	36
Parkside	Warrington	4.6	11	25
Parkside	Wigan	7.9	20	24
Parkside	Wrexham	49.0	55	53
	<b>Total</b>	<b>457.2</b>	<b>583</b>	<b>47</b>

Typical Local Delivery Route				
Stem time	30	45	60	min
Stem speed	47	47	47	mph
Stem distance	24	35	47	miles
Two way stem distance	48	70	94	miles
Max EV Distance	110	110	110	miles
Two way stem time	60	90	120	mins
Non Stem Distance	62	40	16	miles
One interdrop time	5	5	5	mins
One drop time	10	10	10	mins
Interdrop speed	15	15	15	mph
Interdrop distance	1.25	1.25	1.25	miles
Max number of drops	50	32	13	
Total drop time	500	320	130	mins
Total interdrop time	250	160	65	mins
Total Non Stem Time	750	480	195	mins
Total time (mins)	810	570	315	mins
Total time (hours)	13.50	9.50	5.25	hours





# Competition Site Comparison – 45 minutes Drive Time

This section of the Study assesses how the Parkside site performs against other competing sites when considering a 45 minutes drive time.

The table shows the population within a 45 minutes drive time from a selection of competitor sites in close proximity to Parkside. The results show that Parkside has the fourth largest population catchment within a 45 minutes drive time. The table is ranked in order of largest population within the 45 minutes drive time.

The table also shows, for each competitor site, the area in square miles that can be reached, the number of households and their average weekly income.

Figures are based upon the latest 2011 census.

Site	Area (square miles)	Weekly Household Income	Households (million)	Population (million)	% Difference
Six56	2,456	£625	2.69	6.35	0.0%
Haydock Point	2,195	£622	2.59	6.17	2.9%
Barley Castle Lane, Warrington	2,173	£624	2.54	6.02	5.2%
<b>Parkside, St Helens</b>	<b>1,986</b>	<b>£622</b>	<b>2.47</b>	<b>5.87</b>	<b>7.6%</b>
Haydock Green	1,990	£621	2.45	5.84	8.0%
Haydock 525	1,922	£621	2.40	5.72	10.0%
Eclipse, Irlam	1,921	£626	2.39	5.68	10.6%
M6 Major, Haydock	1,875	£621	2.35	5.61	11.7%
Omega, Warrington	1,754	£625	2.29	5.47	13.9%
H2 Heywood Distribution Park	1,646	£625	2.20	5.41	14.8%
Icon 138, Manchester Airport	2,058	£628	2.29	5.39	15.1%
Carrington Gateway, Carrington	1,650	£625	2.13	5.05	20.6%
Matrix/Revolution, Chorley	1,875	£611	2.13	5.03	20.9%
Logistics North, Bolton	1,664	£624	2.10	4.99	21.5%
Liberty Park, Widnes	1,634	£631	1.93	4.61	27.4%
Fiddlers Ferry Power Station	1,392	£632	1.76	4.22	33.6%
Venus 217, Knowsley	1,362	£632	1.75	4.20	33.9%
Academy BP, Knowsley	1,362	£632	1.75	4.20	33.9%
Magnitude, Middlewich	1,839	£635	1.69	4.04	36.5%
K800, Knowsley	1,110	£628	1.44	3.38	46.8%
Aviator Park, Ellesmere Port	1,491	£644	1.24	2.88	54.7%
J16 Business Park, Radway Green	1,734	£671	0.92	2.16	65.9%
Q110, Crewe	1,707	£675	0.84	1.98	68.8%

# Motorway Junction Comparison – 45 minutes Drive Time

This section of the Study assesses how the Parkside site performs against a selection of other motorway junctions when considering a 45 minutes drive time.

The table shows the population within a 45 minute drive time from a selection of motorway junctions in close proximity to Parkside. The results show that Parkside close to M6 J22 has a good population catchment within a 45 minutes drive time. The table is ranked in order of largest population within the 45 minutes drive time.

The table also shows, for each motorway junction, the area in square miles that can be reached, the number of households and their average weekly income.

Figures are based upon the latest 2011 census.

Motorway Junction	Area (square miles)	Weekly Household Income	Households (million)	Population (million)	%Diff
M6 J20	2,456	£625	2.69	6.35	0.00%
M6 J22	2,297	£624	2.67	6.33	0.34%
M6 J21	2,336	£625	2.67	6.33	0.36%
M62 J11	2,224	£626	2.66	6.30	0.83%
M6 J23	2,195	£622	2.59	6.17	2.94%
M62 J9	2,128	£625	2.58	6.13	3.57%
M56 J10	2,371	£625	2.57	6.08	4.33%
M6 J19	2,354	£625	2.56	6.03	5.03%
M56 J7/8	2,288	£625	2.54	6.00	5.51%
M62 J8	2,033	£625	2.51	5.98	5.96%
M56 J11	2,273	£624	2.46	5.84	8.17%
M6 J24	2,000	£619	2.43	5.81	8.63%
M6 J26	2,052	£619	2.43	5.78	9.00%
M56 J6	2,191	£627	2.43	5.73	9.77%
M6 J25	1,955	£620	2.39	5.71	10.11%
M62 J7	1,955	£625	2.38	5.66	10.96%
M56 J12	2,184	£626	2.27	5.39	15.23%
M62 J6	1,778	£627	2.17	5.18	18.56%
M6 J18	2,102	£629	2.00	4.76	25.03%

# Competitive Site Comparison – 30-120 minutes Drive Time Rankings

Ranking by Drive Time Zone								
Site Location	30mins	45mins	60mins	75mins	90mins	105mins	120mins	Average Ranking
Six56	1	1	4	4	3	1	4	2.6
Eclipse, Irlam	3	7	1	7	7	7	5	5.3
Icon 138, Manchester Airport	4	11	9	3	5	6	6	6.3
Haydock Point	2	2	5	10	9	8	8	6.3
Barley Castle Lane, Warrington	9	3	10	8	6	5	7	6.9
<b>Parkside, St Helens</b>	<b>5</b>	<b>4</b>	<b>6</b>	<b>12</b>	<b>10</b>	<b>9</b>	<b>9</b>	<b>7.9</b>
H2 Heywood Distribution Park	7	10	2	2	11	16	15	9.0
Magnitude, Middlewich	20	19	14	5	1	2	3	9.1
Haydock Green	8	5	7	13	12	10	11	9.4
J16 Business Park, Radway Green	22	22	15	1	2	3	1	9.4
Carrington Gateway, Carrington	10	12	8	9	8	11	10	9.7
Haydock 525	11	6	11	14	14	12	12	11.4
Logistics North, Bolton	6	14	3	11	13	17	16	11.4
Q110, Crewe	23	23	21	6	4	4	2	11.9
Omega, Warrington	13	9	13	15	15	13	13	13.0
M6 Major, Haydock	12	8	12	17	16	14	14	13.3
Liberty Park, Widnes	16	15	17	18	17	15	17	16.4
Matrix/Revolution, Chorley	17	13	16	16	18	21	21	17.4
Venus 217, Knowsley	14	17	18	20	20	19	19	18.1
Fiddlers Ferry Power Station	19	16	20	19	19	18	18	18.4
Academy BP, Knowsley	15	18	19	21	21	20	20	19.1
K800, Knowsley	18	20	22	22	22	23	23	21.4
Aviator Park, Ellesmere Port	21	21	23	23	23	22	22	22.1

This section of the Study assesses how the site performs against other competitive sites when considering a range of drive times between 30 minutes and 120 minutes.

The table shows the ranking against each of the competitor sites for different drive times. The final column shows the average of the rankings.

The results indicate that Parkside is in the top 6 site locations out of the sample of 23. The conclusion is that the Parkside site performs well for both local and regional transport.

# Motorway Junction Comparison – 30-120 minutes Drive Time Rankings

Ranking by Drive Time Zone								
Motorway Junction	30mins	45mins	60mins	75mins	90mins	105mins	120mins	Average
M6 J20	5	1	5	5	4	4	4	4.0
M62 J11	1	4	1	7	8	8	2	4.4
M6 J21	4	3	3	6	6	5	5	4.6
M6 J19	11	8	13	2	2	1	3	5.7
M6 J22	2	2	2	8	10	9	8	5.9
M56 J7/8	9	9	10	4	3	3	6	6.3
M56 J6	7	14	8	3	5	7	7	7.3
M6 J18	19	19	9	1	1	2	1	7.4
M62 J9	3	6	4	10	11	11	9	7.7
M56 J10	10	7	11	9	7	6	10	8.6
M6 J23	6	5	6	11	14	12	11	9.3
M62 J8	8	10	7	12	12	13	12	10.6
M56 J11	12	11	17	13	9	10	13	12.1
M6 J25	15	15	12	14	15	15	15	14.4
M62 J7	14	16	15	15	16	16	16	15.4
M56 J12	13	17	19	19	13	14	14	15.6
M6 J24	16	12	14	16	17	17	17	15.6
M6 J26	17	13	16	17	18	18	18	16.7
M62 J6	18	18	18	18	19	19	19	18.4

This section of the Study assesses how the site performs against other motorway junctions when considering a range of drive times between 30 minutes and 120 minutes.

The table shows the ranking against each of the local motorway junctions for different drive times. The final column shows the average of the rankings.

The results indicate that M6 J22 is in the top 5 junctions out of the sample of 19. The conclusion is that M6 J22 performs well for both local and regional transport.

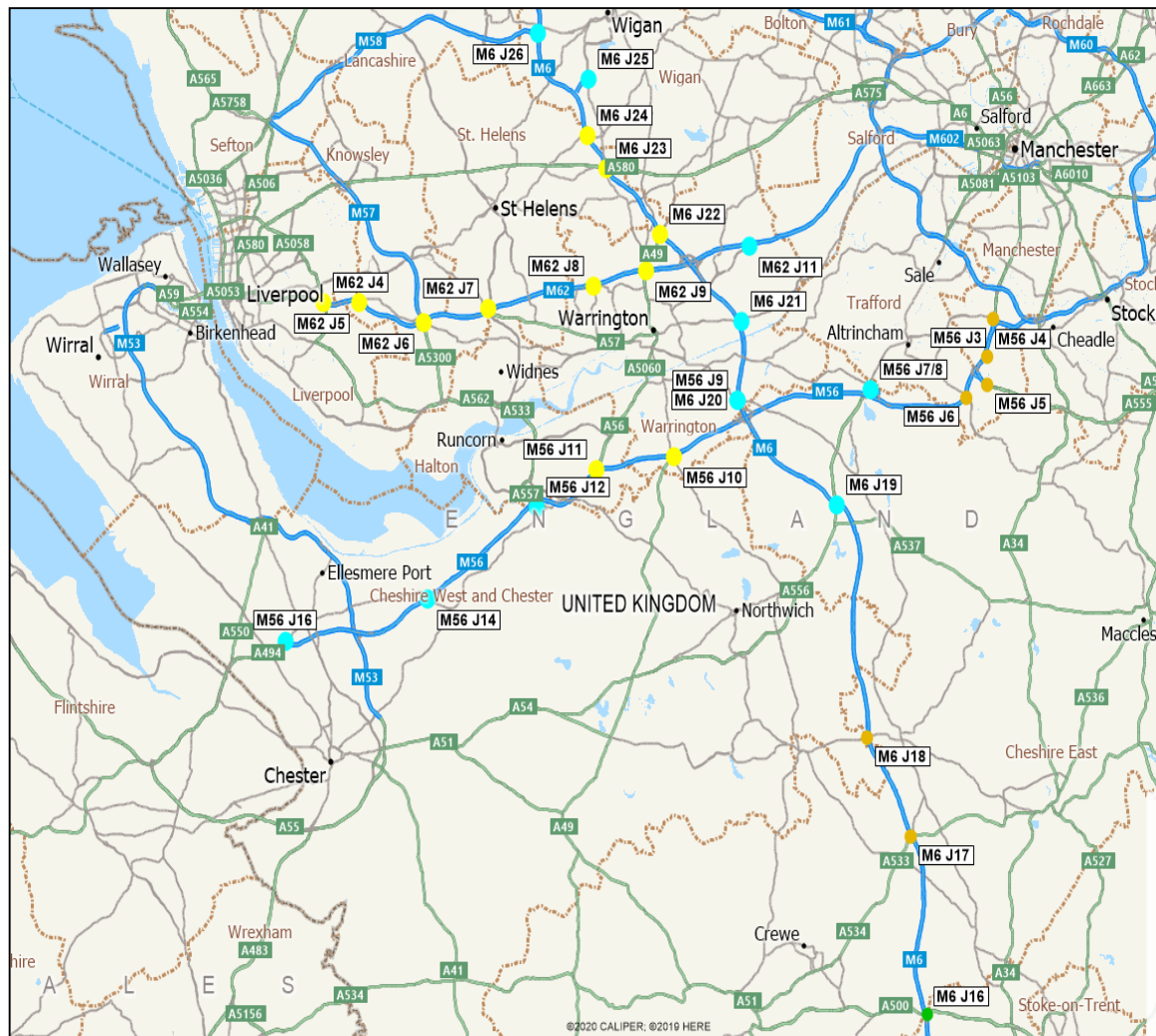
# Evaluation of Sites as an Import Centre (via Liverpool2)

Junction	M73 J2	A1M J66	M6 J22	M1 J42	M6 J2	M4 J22	M25 J28	M25 J11	Liverpool2	Total	Outbound
M62 J6	70,803	28,183	6,082	24,377	62,277	77,603	136,825	137,690	39,874	583,714	543,840
M62 J5	71,120	28,364	7,459	25,160	63,913	78,963	138,642	139,581	30,797	583,999	553,202
M62 J7	70,211	27,675	4,408	23,233	61,075	76,975	135,491	136,302	49,422	584,792	535,371
M6 J23	68,291	26,276	1,827	20,541	60,489	78,702	134,841	135,625	58,634	585,225	526,591
M62 J4	71,237	28,716	8,458	25,843	64,508	79,458	139,302	140,269	28,471	586,261	557,789
M6 J22	69,343	26,200	0	20,313	58,617	77,413	132,762	133,460	68,891	586,999	518,108
M62 J8	70,131	26,916	2,164	21,700	59,401	77,409	133,632	134,366	62,566	588,285	525,719
M62 J9	69,702	26,510	1,015	20,914	58,471	76,637	132,600	133,292	69,646	588,787	519,141
M6 J24	67,843	26,139	2,661	21,107	61,741	79,597	136,231	137,072	57,330	589,721	532,390
M56 J11	72,279	27,979	5,180	23,347	56,035	73,513	129,894	130,476	74,292	592,994	518,702
M56 J10	71,976	27,806	4,690	22,565	54,547	73,210	128,242	128,756	83,503	595,295	511,792
M6 J20	71,733	27,198	3,835	21,265	54,384	75,332	128,062	128,568	85,883	596,262	510,379
M56 J9	71,733	27,198	3,835	21,265	54,384	75,332	128,062	128,568	85,883	596,262	510,379
M56 J12	73,047	28,668	7,135	24,684	57,135	72,620	131,116	131,748	70,914	597,066	526,152
M6 J21	70,974	26,612	2,608	20,299	56,138	76,803	130,009	130,595	83,296	597,333	514,038
M6 J26	66,508	25,861	5,111	21,601	64,455	82,094	139,244	140,208	53,404	598,487	545,084
M6 J25	67,313	25,968	3,491	21,123	62,661	80,361	137,252	138,135	63,223	599,527	536,304
M62 J11	70,608	26,124	2,228	19,399	58,405	78,248	132,526	133,216	82,188	602,944	520,756
M6 J19	73,557	27,019	6,783	20,741	51,195	73,998	124,520	124,881	102,594	605,287	502,694
M56 J14	74,813	29,608	9,802	26,507	57,838	71,978	131,897	132,263	72,558	607,264	534,707
M56 J16	75424.3	30753.6	13051.4	28727.1	59693.8	71713.1	133957.3	132788.3	62286.5	608,395	546,109
M56 J7/8	72,632	26,180	6,622	19,114	53,662	76,136	127,260	127,734	102,809	612,149	509,340
M6 J18	76,347	28,614	11,293	23,464	46,123	69,870	118,889	119,020	128,359	621,979	493,620
M56 J6	73,084	25,889	8,613	18,350	53,518	76,159	127,099	127,566	117,393	627,672	510,279
M6 J17	77,619	29,048	13,348	24,247	43,781	67,923	116,288	116,312	140,746	629,313	488,567
M56 J4	72,566	25,541	9,023	17,666	54,305	76,814	127,681	128,476	121,066	633,138	512,072
M56 J5	73,039	25,788	9,310	17,973	54,000	76,560	127,530	128,124	121,825	634,149	512,324
M56 J3	72,082	25,265	9,173	17,141	55,209	77,469	128,556	129,521	122,034	636,451	514,417
M6 J16	79,710	30,129	16,767	26,228	40,888	65,159	113,075	112,802	159,253	644,012	484,759

This analysis assumes that an Import Centre is located at each of the sample motorway junctions, one at a time. The figures show a calculation of the annual one-way mileage travelled from the Import Centre location to each of eight regional distribution centres in proportion to population. Product is assumed to be imported by container through Liverpool2 docks. The example assumes 100,000 delivered pallets per year and a vehicle fill of 25 pallets.

# Categorisation of Sites as an Import Centre (via Liverpool2)

Junction	Var%	Category
M62 J6	0.00%	GOLD
M62 J5	0.05%	GOLD
M62 J7	0.18%	GOLD
M6 J23	0.26%	GOLD
M62 J4	0.44%	GOLD
M6 J22	0.56%	GOLD
M62 J8	0.78%	GOLD
M62 J9	0.87%	GOLD
M6 J24	1.03%	GOLD
M56 J11	1.59%	GOLD
M56 J10	1.98%	GOLD
M6 J20	2.15%	SILVER
M56 J9	2.15%	SILVER
M56 J12	2.29%	SILVER
M6 J21	2.33%	SILVER
M6 J26	2.53%	SILVER
M6 J25	2.71%	SILVER
M62 J11	3.29%	SILVER
M6 J19	3.70%	SILVER
M56 J14	4.03%	SILVER
M56 J16	4.23%	SILVER
M56 J7/8	4.87%	SILVER
M6 J18	6.56%	BRONZE
M56 J6	7.53%	BRONZE
M6 J17	7.81%	BRONZE
M56 J4	8.47%	BRONZE
M56 J5	8.64%	BRONZE
M56 J3	9.03%	BRONZE
M6 J16	10.33%	OTHER



Categorisation compared to Best: GOLD < 2%, SILVER < 5%, BRONZE < 10%, OTHER > 10%

# Comparison of Distance Travelled from Key Ports to RDCs

Number of Miles Travelled from Port to RDCs									
Port	RDC Location								
	M73 J2	A1M J66	M6 J22	M1 J42	M6 J2	M4 J22	M25 J28	M25 J11	Total
	9%	6%	14%	10%	15%	12%	16%	17%	100%
Liverpool	79,439	42,785	14,619	32,982	76,308	84,318	143,305	146,685	620,441
Bristol	137,441	74,284	93,382	83,667	68,527	3,098	98,655	71,511	630,565
London Gateway	153,772	73,500	127,388	84,715	74,226	76,199	9,542	39,659	639,000
Southampton	160,520	82,329	128,671	96,700	80,555	48,996	73,533	40,763	712,068
Teesport	71,288	10,955	75,936	31,826	108,801	122,836	156,424	174,859	752,926
Felixstowe	156,412	75,302	140,192	87,635	87,872	101,952	41,340	81,843	772,548
Newcastle	59,693	3,075	92,195	43,584	126,128	135,775	174,032	193,424	827,906

The figures in the table show a calculation of the annual one-way mileage travelled from each deep water port location to each of eight regional distribution centres within an optimised network. Product is assumed to be imported by container through each port and transported to each RDC in proportion to population. The example assumes 100,000 delivered pallets per year and a vehicle fill of 25 pallets.

The analysis shows that Liverpool has the lowest road based cost for national distribution from the UK's deep water ports. Given the attractiveness of Liverpool as a port to feed into a national distribution network, the benefits in terms of cost and carbon footprint will reflect positively on the Parkside site and enhance its potential role as an import centre.



# Client Considerations – Types of Companies

This section of the Study describes some of the likely types of end users who should be attracted to the Parkside site.

Companies with a Network of Regional Warehouses (90 minutes stem drive time)

- Grocery retailers (eg Asda, Tesco, Waitrose)
- Non grocery retailers, including electrical and fashion (eg John Lewis)
- Food and drink wholesalers
- General wholesalers
- Parcels hub (eg DPD, Parcelforce, UPS)
- E Commerce hub (eg Amazon, DHL, Hermes)
- If national, could have 6-10 sites around the country

North West Manufacturing Companies wishing to Operate a National Distribution

- Local food and drink producers (eg Kelloggs, Heinz, Princes, Halewood, Interbrew, Diageo)
- Local non food manufacturers (eg Astra-Zeneca, Unilever)

Importers (via Liverpool)

- Irish food and drink producers (eg Diageo, Glanbia, Oaklands)
- Imports from USA, Canada and S America
- Raw materials and ingredient suppliers
- Imports on behalf of retailers (eg Adidas, Asda, Asos, John Lewis, Primark)

Companies undertaking Local deliveries (45 minutes stem drive time)

- Any company undertaking “last-mile” deliveries
- Home grocery delivery (eg Amazon Fresh, Ocado, Waitrose)
- Home non grocery delivery (eg Amazon, John Lewis)
- Parcels depot (eg DPD, Parcelforce, UPS)
- If national, could have 20-25 sites around the country

# Client Considerations – Sizing of Facilities

The ideal sizing of a client or end user facility will depend upon the scale and type of business. Some general estimates are:

## Regional Warehouse or Hub

- 150,000 – 300,000 sqft (14,000 – 28,000sqm)
- 10 – 15 acres (4 – 6 hectares)
- 10-20 metres high

## Large Regional / National Warehouse or Hub

- 250,000 – 800,000 sqft (24,000 – 75,000sqm)
- > 15 acres ( > 6 hectares)
- 10-40 metres high, dependent upon the level of automation

## Local Warehouse or Fulfilment Hub

- 50,000 – 150,000 sqft (5,000 – 14,000sqm)
- 5 – 10 acres (2 – 4 hectares)
- 8-10 metres high
- For small fulfilment hubs there is a proportionately larger requirement for vehicle parking

# Conclusions

Based upon the detailed modelling and analysis undertaken within the Study, Parkside ranks highly when compared to other sites and locations. The main observations are:

1. Parkside is located near the centre of the North West's motorway network, which means that the geographical area that can be covered within a particular drive time zone is large, when compared to other locations
2. Parkside is located near the centre of the high population belt of Liverpool, Warrington and Manchester. This means that the extensive drive time area contains a large population of potential customers
3. Parkside, near to Motorway M6 Junction 22, is one of the regional locations forming the optimal network for configurations of seven and eight warehouse networks
4. Parkside is a prime site to locate an Import Centre linked to Liverpool2 docks. The Import Centre could be considered as a stand alone site or its role could be combined with providing regional distribution
5. When compared to other deep sea ports, Liverpool2 has the minimum road transport costs to a network of regional distribution centres supporting their individual customer bases. This should add to the credentials of Parkside as a good location in terms of sustainability
6. Parkside is an excellent location to operate local or "last-mile" distribution and utilise sustainable electric vehicles
7. Given its location in relation to population centres, Parkside has an excellent catchment area for recruiting staff

**Model Logic Ltd**

**Six 56**

**Logistics Study**

**Report**

**17 July 2020**

# Introduction to the Six 56 Logistics Study

## Background

Model Logic have been instructed by Langtree PP and Pannatoni to prepare an independent Logistics Study to support the outline planning application for a warehouse development (Use Class B8 with ancillary B1(a) offices) and associated infrastructure on land adjacent to Junction 20 of the M6 Motorway and Junction 9 of the M56 Motorway (referred to as Six 56 Warrington).

This Study will assess the locational characteristics of the Six 56 site and whether this would be an optimal location for a Logistics Park based on operator and end user requirements. In the absence of a named end user for this site at this stage in the planning process, this report has been undertaken to determine an identified need from large scale logistics and distribution end users to operate in this location within the Borough as well as the wider region.

This Study should also be read in conjunction with the Jones Lang LaSalle (JLL) Marketing Report (2020) which focuses on the current need and supply and provides an up-to-date market overview and assessment of alternative employment sites including those within Warrington and outside the Borough on a regional and sub-regional level, along principal motorway corridors, including sites to the west of Manchester along principal motorway corridors, the M6 corridor between junctions 23 and 16, which is approximately 36 miles, which covers the market areas of North to Mid Cheshire and South Cheshire respectively. The report considers the current market for logistics and industrial buildings in excess of 100,000 square feet.

**Model Logic** is a supply chain and logistics consultancy with a 30 year track record of delivering complex strategic supply chain projects to a wide range of Blue Chip organisations across numerous industry sectors – from grocery, food and drink, pharmaceuticals, media and entertainment, through to DIY, building and gardening supplies.

Model Logic offers extensive supply chain knowledge and experience, supported by a range of strategic and operational modelling tools and have worked with a number of Blue Chip Logistics Operators to provide a framework for evaluating optimum locations for their distribution hubs and warehouses.

# Definition of Terms (1)

A **Supply Chain Network** is a configuration of facilities arranged to allow the movement of materials from their source locations to their final customers. A network can take many different forms dependent upon the nature of the company's business, its role in the supply chain and its size. The diagrams below show three alternative networks for a retail company.

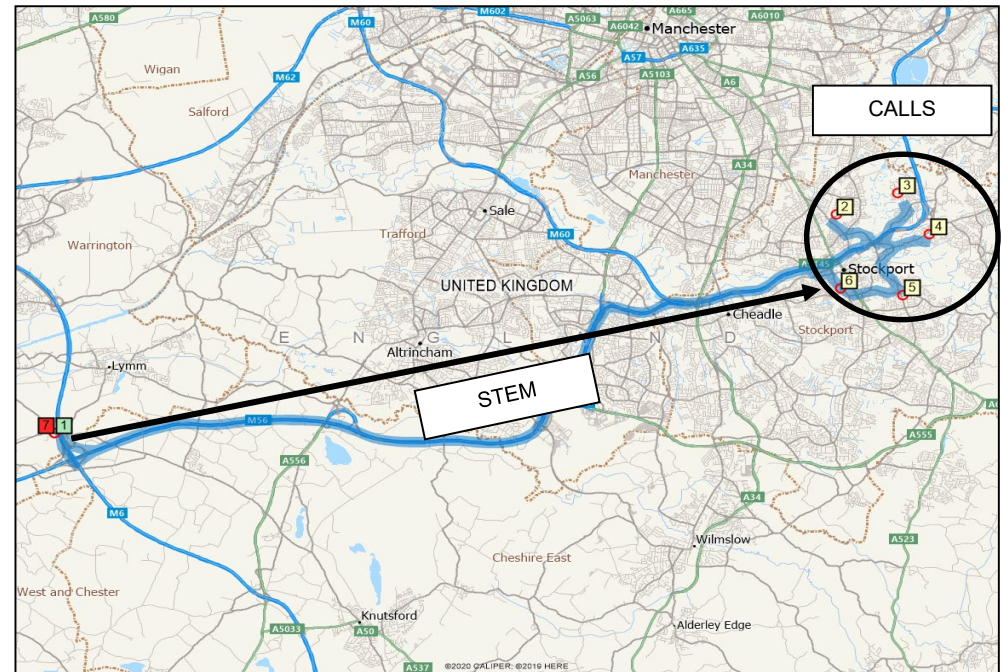
**Network Design** is the process of evaluating alternative configurations of facilities, in terms of their number, size and roles. The design process is usually supported by using computer models together with digital maps and road networks to evaluate a range of options. The objective of the modelling has historically been to identify the minimum cost network, but can be extended to include other parameters including service level and carbon footprint.



Example Retail Network Configurations

## Definition of Terms (2)

A transport route can be described as a combination of a **Stem** element and a series of **Calls** (petal element). In the example, a vehicle is planned to travel from Six 56 to make five calls in the Stockport area. The distance from the start to the first call is described as the **Stem Distance** and the time to travel is the **Stem Time**. The distance between each of the calls is described as the **Inter-drop Distance** and the time between calls is the **Inter-drop Time**.



An **Import Centre** is a facility, usually a warehouse, where goods are received from a port or an airport. Goods are received in bulk form, typically by container or airline unit load device (ULD). The containers or ULDs are emptied (de-stuffed) and the products are either re-stacked onto pallets or fed into an automated storage system. The Import Centre either supplies directly to end customers or feeds a number of regional or local warehouses across the country. An **Export Centre** is a facility that prepares goods for export and involves filling (stuffing) containers or airline ULDs.

# Introduction to Network Design and Warehouse Location

This report has been prepared through the eyes of an end user or operator who may be a retailer, manufacturer, wholesaler or service provider and identifies the steps taken by these operators when undertaking a search to identify an optimum location. A third party logistics company may be contracted to operate a specific site, however the principles of network design will still apply. Designing an effective distribution network is one of the key elements of an end user's sustainability strategy. Configuring a network of warehouses of the correct size in their ideal locations determines the efficiency of transport routes both of a primary and secondary nature. Locating warehouses in the wrong configuration can lead to inefficient routes and incurring excess mileage and carbon usage.

Although the shape and size of an operator's network will vary dependent upon the nature and size of the business, the principles of network design remain the same. A range of parameters are included within an analysis, including:

- Location and demand of customers, either Business-to-Consumer (B2C) or Business-to-Business (B2B)
- Required service offering to customers in terms of supply lead time
- Source location of products together with their characteristics in terms of size, weight, stock levels and value
- Primary and secondary transport parameters, including vehicle capacities and operating costs
- Warehouse parameters, in terms of size, operating methods and costs, both development and operational
- Motorways, regional and local road network, including road speeds
- Availability of local labour and ease of travel to work

To evaluate the ideal network for an end user it is usual to construct a network computer model of the supply chain which takes into account all of the parameters described above. Where the location and sizing of new facilities is being evaluated the model will provide a ranking of possible locations based upon the required balance between service, cost and sustainability. The ranking can be categorised into gold, silver and bronze locations in order to provide a brief to commercial agents to undertake a search.

Evaluating the potential of specific development sites in order to attract end users turns the objective of the exercise on its head. The question becomes how well suited is the location and size of the site to synchronise with the network strategies of a range of end users. The methodology used in this report is to analyse the theoretical performance of the Six 56 site against other locations using end user objectives as a guide.



# Six 56 Location

Six 56 is situated in a prime location to service the North West (NW) of England. Six 56 is located to the southeast of the town of Warrington (approximately 3.5 miles from the town centre) and between the cities of Liverpool and Manchester (approximately 13 miles and 19 miles respectively). It is also located approximately 10 miles from Manchester Airport.

The M56 Motorway and M6 Motorway interchange (Junction 20 and 20A of the M6 and Junction 9 of the M56 Motorways) is located adjacent to the south east of the Site, with the M56 Motorway running east-west to the south of the Site, providing links to Cheshire and Greater Manchester; and the M6 Motorway running north-south to the east of the Site, provide links to Lancashire, Staffordshire and Greater Manchester, as well as the M62 Motorway at Junction 22A of the M6 Motorway to the north, which provides links east-west to Liverpool, Greater Manchester and Yorkshire.

The Drive Time to Population Centres Table shows the population by postcode area (PCA), ranked by the closest PCA. This shows that within a 1 hour drive time a population of over 7 million can be reached and within 2 hours the catchment is 20 million (based upon the latest 2011 census). The NW has a dense network of connected motorways which means that a high proportion of business journeys over 10 miles will involve using a motorway. This is reflected in the large area that can be covered within a drive time zone of 45 mins or one hour. Given the high population densities of Liverpool, Manchester and Warrington the drive time area yields an attractive local customer base for business development.

Drive Time to Population Centres					
Postcode Area (PCA)	Postcode Area Name	2011 Population	Distance from Six56 (miles)	Time from Six56 (mins)	Cumulative Population
WA	Warrington	616,180	18	20	616,180
SK	Stockport	603,795	15	24	1,219,975
M	Manchester	1,167,402	18	25	2,387,377
WN	Wigan	308,483	21	26	2,695,860
L	Liverpool	857,079	24	28	3,552,939
BL	Bolton	380,259	25	34	3,933,198
PR	Preston	520,556	33	37	4,453,754
CH	Chester	659,743	38	40	5,113,497
CW	Crewe	309,489	40	49	5,422,986
FY	Blackpool	276,623	52	53	5,699,609
OL	Oldham	462,833	39	53	6,162,442
HX	Halifax	160,378	43	53	6,322,820
ST	Stoke-on-Trent	644,068	39	56	6,966,888
HD	Huddersfield	262,814	48	57	7,229,702
TF	Telford	212,061	50	65	7,441,763
LL	Llandudno	537,467	54	67	7,979,230
BB	Blackburn	488,917	53	68	8,468,147
LS	Leeds	774,180	61	69	9,242,327
WS	Walsall	449,687	69	73	9,692,014
S	Sheffield	1,358,507	49	73	11,050,521
DE	Derby	730,620	53	82	11,781,141
B	Birmingham	1,904,658	82	85	13,685,799
WF	Wakefield	512,657	80	87	14,198,456
DY	Dudley	410,598	74	89	14,609,054
CV	Coventry	821,807	81	89	15,430,861
LE	Leicester	985,795	88	89	16,416,656
SY	Shrewsbury	342,140	78	95	16,758,796
HG	Harrogate	138,343	84	98	16,897,139
YO	York	562,439	101	102	17,459,578
WV	Wolverhampton	395,857	83	106	17,855,435
DL	Darlington	360,975	109	107	18,216,410
CA	Carlisle	318,244	115	107	18,534,654
LA	Lancaster	328,704	103	114	18,863,358
DN	Doncaster	755,713	90	118	19,619,071

# Principles of Drive Time Analysis

## Digital Maps and the Road Network

Digital maps, including the latest road network have been used to calculate the distances and travel times between selected points.

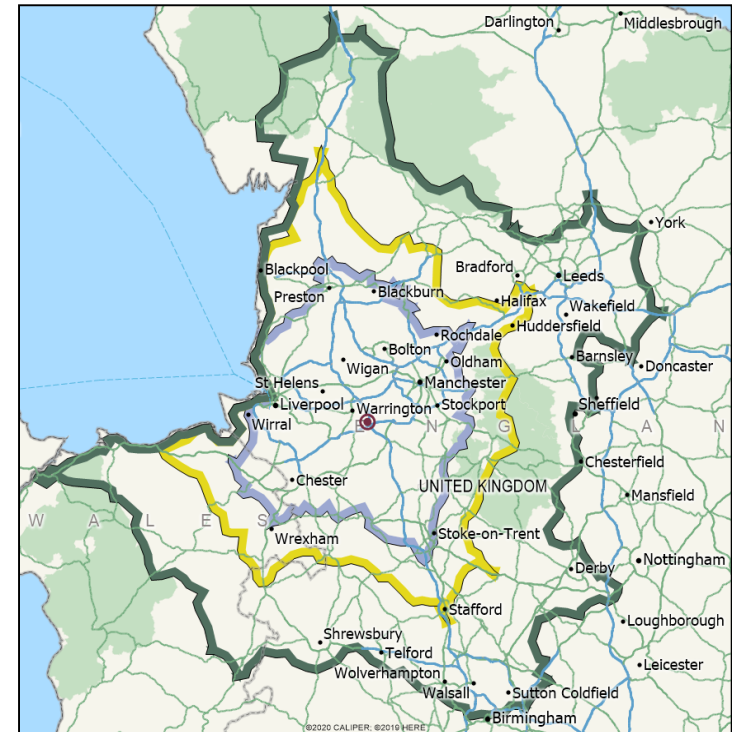
## Population Data

Where information on specific end users' business isn't available the most robust method of analysis is to use population as an indicator of consumer or customer demand. The last national census took place in 2011 and this information is used as the basis of analysis. In addition to population the census data that has been used also includes the number of households and the weekly income per household.

## Drive Time Analysis

A key aspect of using digital maps is the ability to undertake drive time analysis which creates drive time zones from a selected start point. The shapes of the zones that are created depend upon where the roads are located and the driving speeds for the different road types. There can be a choice of whether the quickest or shortest route is taken. For this Study the quickest route is used.

Once the drive time zone has been established it is then possible to summarise the population characteristics within it and also calculate its area, in square miles.



The map shows the boundaries of the zones that can be reached within 45, 60 and 90 minutes drive from the Six 56 site. Based upon average drive speeds.

# Motorway Junction Comparison – 90 minutes Drive Time

This section of the Study assesses how the site performs against a selection of other motorway junctions when considering a 90 minutes drive time.

A 90 minutes stem drive time is a useful guide for a warehouse that is to have regional coverage. Typically a large retailer or wholesaler may have eight to ten regional sites covering the UK.

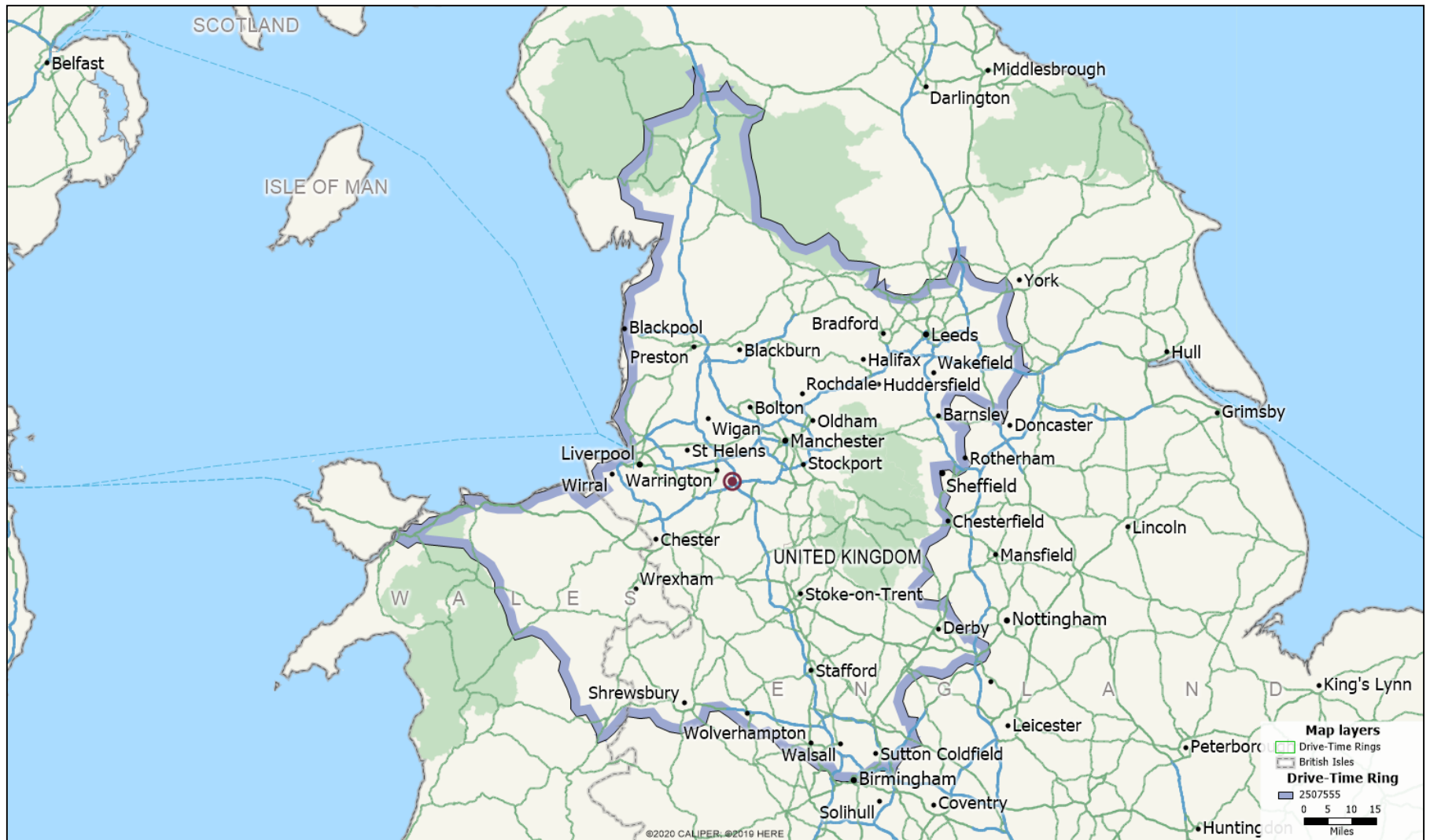
The table shows the population within a 90 minutes drive time from a selection of motorway junctions in close proximity to Six 56. The results show that Six 56 has one of the largest population catchment within a 90 minutes drive time.

The table also shows, for each motorway junction, the area in square miles that can be reached, the number of households and their average weekly income.

Figures are based upon the latest 2011 census.

Motorway Junction	Area (square miles)	Weekly Household Income	Households	Population
M6 J19	9,544	£632	6,538,621	15,677,081
M56 J7/8	9,407	£632	6,325,101	15,145,679
M6 J20	9,723	£633	6,213,413	14,881,952
M6 J21	9,513	£634	6,009,304	14,398,435
M56 J10	9,482	£632	5,972,574	14,335,468
M62 J11	9,506	£637	5,892,743	14,096,130
M56 J11	9,188	£633	5,709,460	13,705,074
M62 J9	9,054	£637	5,607,570	13,306,843
M6 J22	8,858	£637	5,460,502	12,927,316
M62 J8	8,809	£637	5,391,079	12,748,939
M56 J12	8,829	£633	5,355,472	12,747,718
M62 J7	8,479	£637	5,021,163	11,827,537

# M6 J20 – 90 mins Drive Time Zone



The map shows the boundary of the zone that can be reached within 90 minutes drive from the Six 56 site. Based upon average drive speeds.

# Competitor Site Comparison – 90 minutes Drive Time

This section of the Study assesses how the site performs against other competing sites when considering a 90 minutes drive time.

The table shows the population within a 90 minutes drive time from a selection of competitor sites in close proximity to Six 56. The results show that Six 56 has one of the largest population catchment within a 90 minutes drive time.

The table also shows, for each competitor site, the area in square miles that can be reached, the number of households and their average weekly income.

Figures are based upon the latest 2011 census.

Site	Area (square miles)	Weekly Household Income	Households	Population
Magnitude, Middlewich	8,620	£629	6,321,206	15,202,698
J16 Business Park, Radway Green	8,665	£630	6,322,783	15,074,508
Six56	9,723	£633	6,213,413	14,881,952
Q110, Crewe	8,506	£629	6,089,951	14,510,664
Icon 138, Manchester Airport	8,962	£634	6,048,188	14,397,965
Barley Castle Lane, Warrington	9,098	£633	5,871,216	14,094,323
Eclipse, Irlam	8,947	£637	5,636,995	13,420,133
Carrington Gateway, Carrington	8,287	£637	5,471,314	12,913,536
Parkside, St Helens	8,652	£637	5,268,721	12,429,628
H2 Heywood Distribution Park	8,723	£643	5,250,580	12,356,138
Haydock Green	8,616	£637	5,152,528	12,135,309
Logistics North, Bolton	8,294	£641	5,045,255	11,915,369
Haydock 525	8,409	£637	5,019,147	11,813,380
Omega, Warrington	8,148	£637	4,986,666	11,740,923
M6 Major, Haydock	8,240	£637	4,897,648	11,529,007
Liberty Park, Widnes	7,506	£633	4,612,668	10,884,212
Matrix/Revolution, Chorley	7,760	£639	4,583,682	10,753,988
Fiddlers Ferry Power Station	7,040	£633	4,418,762	10,432,169
Venus 217, Knowsley	6,895	£633	4,296,990	10,167,903
Academy BP, Knowsley	6,895	£633	4,296,990	10,167,903
K800, Knowsley	6,277	£629	4,108,853	9,763,160
Aviator Park, Ellesmere Port	7,067	£629	3,872,300	9,105,731

# Regional DC – 90 mins – National Comparison

This section of the Study assesses how the site could perform as a Regional Distribution Centre against a selection of other motorway junctions nationally across England when considering a 90 mins drive time.

The table shows the population within a 90 minute drive time from a selection of motorway junctions across England. The results show that the main population catchment areas are in SE England, however NW England has the next best coverage, with Six 56 featuring highly.

The table also shows, for each motorway junction, the area in square miles that can be reached, the number of households and their average weekly income.

Figures are based upon the latest 2011 census.

Motorway Junction	Area (square miles)	Weekly Household Income	Households	Population
M40 J4	11,513	£863	8,480,487	21,261,803
M40 J8	11,504	£832	8,278,344	21,148,235
M40 J1	11,714	£874	8,356,309	20,909,481
M25 J14	11,867	£874	8,333,754	20,807,642
M1 J6	11,748	£872	8,288,307	20,775,093
M1 J14	11,319	£816	8,063,497	20,773,277
M25 J18	11,829	£877	8,289,467	20,754,525
M4 J5	11,630	£876	8,228,720	20,581,793
M1 J10	11,320	£868	8,118,828	20,443,368
M25 J10	10,950	£872	8,166,563	20,322,897
M25 J22	11,729	£876	8,070,596	20,237,041
M3 J3	11,251	£873	8,071,858	20,135,945
M25 J26	11,085	£882	7,794,424	19,504,163
M23 J7	8,950	£875	7,719,783	19,239,911
M4 J1	9,610	£887	7,581,971	19,077,371
M25 J30	9,702	£879	7,608,667	18,914,800
M25 J2	9,161	£878	7,604,082	18,911,611
M25 J5	8,662	£878	7,524,210	18,757,851
M1 J2	9,341	£889	7,303,893	18,429,353
M4 J11	10,532	£876	7,246,183	18,282,952
M11 J12	10,907	£830	6,357,301	16,239,013
M6 J16	9,512	£631	6,666,870	15,955,723
M1 J18	12,140	£736	6,482,201	15,760,220
M6 J12	11,501	£642	6,482,106	15,579,468
M1 J29	10,984	£644	6,409,835	15,435,511
M6 J20	9,723	£633	6,213,413	14,881,952
M40 J15	12,442	£728	6,045,968	14,840,297
M621 J3	11,066	£637	6,180,852	14,616,233
M62 J25	10,593	£637	6,172,746	14,560,610
M62 J28	11,313	£638	6,158,146	14,555,011
M1 J25	11,884	£659	6,000,724	14,480,655
M1 J41	11,360	£638	6,110,335	14,431,720
M56 J2	9,253	£636	6,064,457	14,428,634
M1 J33	10,995	£645	5,974,177	14,336,213
M6 J2	12,883	£707	5,903,070	14,322,897
M1 J45	11,069	£637	6,013,782	14,172,751
M62 J11	9,506	£637	5,892,743	14,096,130
M1 J37	10,888	£644	5,885,346	13,967,770
M62 J32	11,399	£639	5,896,688	13,901,165
M60 J26/27	9,076	£638	5,821,736	13,729,904
M6 J9	11,719	£659	5,674,586	13,706,615
M1 J21A	11,904	£685	5,681,487	13,675,251
M42 J10	12,208	£669	5,518,678	13,330,910
M6 J4	12,612	£687	5,452,967	13,187,688
M62 J21	9,442	£642	5,472,467	12,892,431
M4 J15	10,804	£819	5,278,330	12,806,344
M6 J23	9,115	£637	5,393,108	12,741,329
M60 J17	9,572	£643	5,388,377	12,676,015
M60 J22	8,892	£642	5,357,379	12,587,659
M5 J2	11,740	£674	5,172,436	12,552,262

# Why use 45 minutes for Drive Time for Local Analysis?

In order to emphasise the green credentials of the Six 56 site it is assumed that local deliveries are made using Electric Vehicles (EVs). EVs currently have a maximum driving distance of 110 miles, which could be less in cold weather. From a sample of routes the average speed for the stem element of the delivery route is approximately 50 mph (see table Sample Stem Journeys from Six 56).

Using the route parameters for a typical local delivery operation (eg grocery home delivery) the ideal stem time is 45 minutes (see table Typical Local Delivery Route), which provides a practical working day for the driver of 8.5 hours. Increasing the stem drive time to 60 minutes reduces the effective time for making deliveries and produces a working day of only 4 hours.

Based upon this high level analysis, the 45 minutes stem time is deemed as the best basis for comparing catchment areas for siting a local delivery facility within the vicinity of Six 56.

Sample Stem Journeys from Six56				
From	To	Distance (miles)	Time (mins)	Speed (mph)
M6 J20	Stockport	17	19	54
M6 J20	Oldham	29	36	48
M6 J20	Stoke-on-Trent	33	37	54
M6 J20	Wrexham	37	40	56
M6 J20	Flint	45	45	60
M6 J20	Wallasey	24	32	45
M6 J20	Liverpool Centre	39	40	59
M6 J20	Bootle	26	35	45
M6 J20	Warrington	6	12	32
M6 J20	Manchester Centre	18	28	39
<b>Total</b>		<b>274</b>	<b>324</b>	<b>51</b>

Typical Local Delivery Route				
Stem time	30	45	60	mins
Stem speed	50	50	50	mph
Stem distance	25	37.5	50	miles
Two way	50	75	100	miles
Max EV Distance	110	110	110	miles
Two way stem time	60	90	120	mins
Non Stem Distance	60	35	10	miles
One interdrop time	5	5	5	mins
One drop time	10	10	10	mins
Interdrop speed	15	15	15	mph
Interdrop Distance	1.25	1.25	1.25	miles
Max No Drops	48	28	8	
Total drop time	480	280	80	mins
Total interdrop time	240	140	40	mins
Total Non Stem Time	720	420	120	mins
Total time (mins)	780	510	240	mins
Total time (hours)	13	8.5	4	hours

# Motorway Junction Comparison – 45 minutes Drive Time

This section of the Study assesses how the site performs against a selection of other motorway junctions when considering a 45 minutes drive time.

The table shows the population within a 45 minute drive time from a selection of motorway junctions in close proximity to Six 56. The results show that Six 56 has the largest population catchment within a 45 minutes drive time.

The table also shows, for each motorway junction, the area in square miles that can be reached, the number of households and their average weekly income.

Figures are based upon the latest 2011 census.

Motorway Junction	Area (square miles)	Weekly Household Income	Households	Population
M6 J20	2,456	£625	2,691,240	6,354,293
M6 J21	2,336	£625	2,673,518	6,331,202
M62 J11	2,224	£626	2,659,608	6,301,551
M62 J9	2,128	£625	2,577,990	6,127,599
M56 J10	2,371	£625	2,570,812	6,079,312
M6 J19	2,354	£625	2,556,034	6,034,769
M56 J7/8	2,288	£625	2,544,778	6,004,181
M6 J22	2,058	£624	2,523,265	6,002,236
M62 J8	2,033	£625	2,514,266	5,975,652
M56 J11	2,273	£624	2,458,869	5,835,232
M62 J7	1,955	£625	2,377,176	5,657,876
M56 J12	2,184	£626	2,268,963	5,386,675





# Competition Site Comparison – 45 minutes Drive Time

This section of the Study assesses how the site performs against other competing sites when considering a 45 minutes drive time.

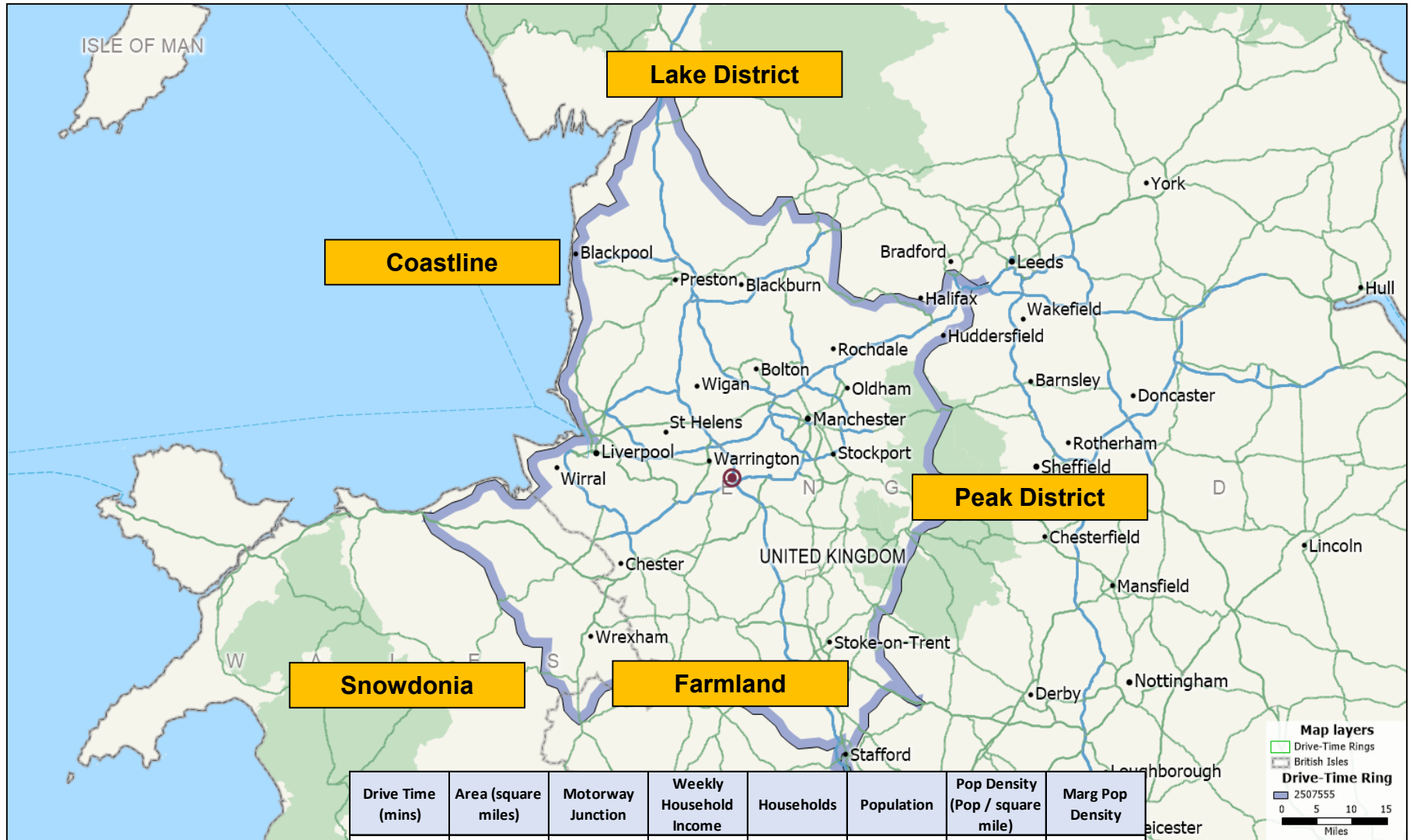
The table shows the population within a 45 minutes drive time from a selection of competitor sites in close proximity to Six 56. The results show that Six 56 has the largest population catchment within a 45 minutes drive time.

The table also shows, for each competitor site, the area in square miles that can be reached, the number of households and their average weekly income.

Figures are based upon the latest 2011 census.

Site	Area (square miles)	Weekly Household Income	Households	Population
Six56	2,456	£625	2,691,240	6,354,293
Barley Castle Lane, Warrington	2,173	£624	2,539,317	6,022,103
Parkside, St Helens	1,986	£622	2,465,697	5,870,325
Haydock Green	1,990	£621	2,452,269	5,843,650
Haydock 525	1,922	£621	2,396,722	5,720,319
Eclipse, Irlam	1,921	£626	2,390,133	5,682,301
M6 Major, Haydock	1,875	£621	2,347,709	5,611,023
Omega, Warrington	1,754	£625	2,291,535	5,469,294
H2 Heywood Distribution Park	1,646	£625	2,199,221	5,414,692
Icon 138, Manchester Airport	2,058	£628	2,288,433	5,394,899
Carrington Gateway, Carrington	1,650	£625	2,134,370	5,047,511
Matrix/Revolution, Chorley	1,875	£611	2,125,093	5,027,492
Logistics North, Bolton	1,664	£624	2,096,200	4,985,221
Liberty Park, Widnes	1,634	£631	1,931,560	4,610,143
Fiddlers Ferry Power Station	1,392	£632	1,756,650	4,216,894
Venus 217, Knowsley	1,362	£632	1,748,335	4,197,748
Academy BP, Knowsley	1,362	£632	1,748,335	4,197,748
Magnitude, Middlewich	1,839	£635	1,689,001	4,037,873
K800, Knowsley	1,110	£628	1,444,126	3,377,696
Aviator Park, Ellesmere Port	1,491	£644	1,242,405	2,879,038
J16 Business Park, Radway Green	1,734	£671	915,970	2,164,401
Q110, Crewe	1,707	£675	843,098	1,984,960

# Catchment Area Considerations



Drive Time (mins)	Area (square miles)	Motorway Junction	Weekly Household Income	Households	Population	Pop Density (Pop / square mile)	Marg Pop Density
45	2,456	M6 J20	£625	2,691,240	6,354,293	2,588	2,588
60	4,444	M6 J20	£627	3,407,984	7,973,584	1,794	814
90	9,723	M6 J20	£633	6,213,413	14,881,952	1,531	1,173

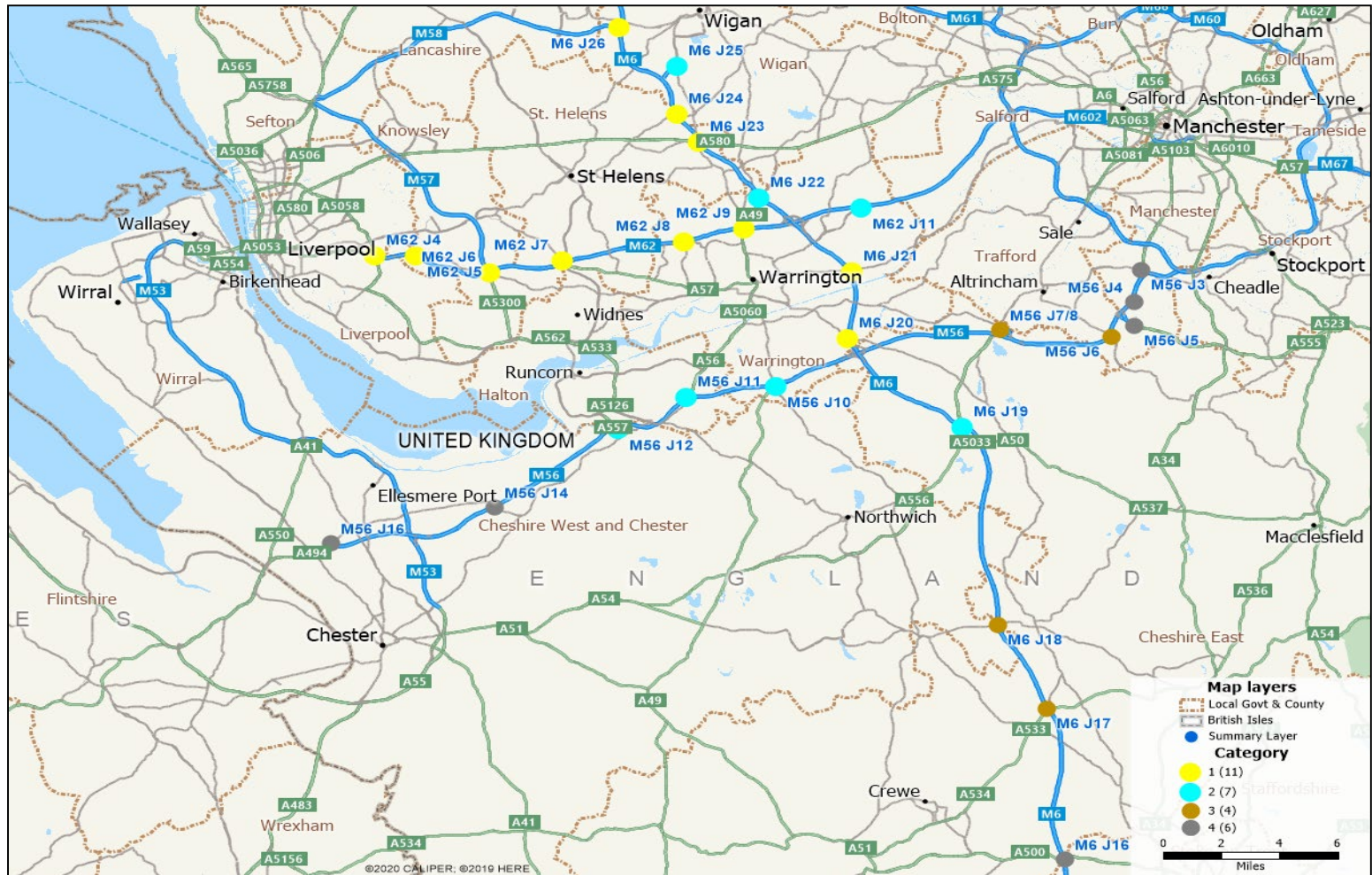
# Evaluation of Sites as an Import Centre (via Liverpool2)

Junction	Cambridge	Portbury	Stretton	Leatherhead	Birmingham	Pontefract	Glasgow	Washington	Liverpool Dock	Total	Outbound
M6 J23	113,980	43,259	6,896	190,310	44,830	40,624	44,936	21,787	71,697	578,322	506,624
M62 J5	120,028	45,660	13,060	198,507	49,767	48,526	48,869	23,643	31,562	579,622	548,061
M6 J24	114,967	43,651	7,902	191,648	45,636	41,546	44,644	22,381	67,357	579,734	512,377
M62 J9	112,432	42,645	5,319	188,212	43,567	41,374	45,976	21,963	78,979	580,467	501,488
M6 J21	109,342	41,418	2,169	184,024	41,044	40,357	46,669	21,724	95,034	581,780	486,746
M62 J8	113,775	43,178	6,687	190,032	44,663	42,639	46,734	22,260	71,899	581,867	509,969
M6 J26	117,858	44,799	10,849	195,566	47,995	46,683	43,775	21,818	53,404	582,746	529,343
M62 J7	116,425	44,230	9,388	193,623	46,825	45,133	47,639	22,846	58,755	584,864	526,109
M62 J6	118,401	45,014	11,402	196,301	48,439	46,994	48,313	23,283	47,028	585,176	538,149
M6 J20	107,473	40,676	0	181,491	39,518	43,932	47,164	22,564	102,391	585,209	482,818
M62 J4	121,359	46,189	14,417	200,310	50,853	49,779	49,323	23,938	29,236	585,404	556,168
M62 J11	112,188	42,548	5,070	187,881	43,367	38,767	46,516	21,351	92,724	590,411	497,687
M6 J22	113,280	42,981	6,183	189,361	44,259	42,372	46,064	22,198	84,006	590,704	506,698
M56 J11	111,010	42,080	4,404	186,285	42,406	47,972	48,629	23,513	85,684	591,982	506,299
M56 J10	109,106	41,324	2,464	183,704	40,851	46,179	47,979	23,092	100,367	595,066	494,699
M6 J25	116,185	44,135	9,144	193,299	46,630	45,108	45,138	22,840	74,691	597,169	522,478
M6 J19	104,072	39,326	3,602	176,883	36,743	47,073	48,352	23,302	120,060	599,414	479,353
M56 J12	113,334	43,003	6,773	189,435	44,303	50,161	49,422	24,027	80,340	600,798	520,458
M56 J7/8	106,703	40,370	4,150	180,448	38,890	44,603	48,541	22,722	122,861	609,287	486,426
M6 J18	98,667	37,180	9,030	169,557	32,331	52,102	50,171	24,483	147,098	620,619	473,521
M6 J17	96,170	36,188	11,504	166,174	30,293	54,388	50,999	25,020	159,420	630,156	470,736
M56 J6	109,590	41,516	6,612	184,361	41,247	41,992	48,469	22,108	135,127	631,022	495,895
M56 J14	116,446	44,238	9,944	193,651	46,842	53,090	50,485	24,715	96,806	636,217	539,412
M56 J5	110,463	41,863	7,502	185,544	41,959	41,744	48,379	22,050	139,559	639,064	499,505
M56 J3	111,430	42,247	8,488	186,854	42,749	40,025	47,756	21,646	144,467	645,661	501,194
M6 J16	92,150	34,592	15,619	160,726	27,012	58,190	52,378	25,913	179,920	646,501	466,581
M56 J16	120,619	45,895	14,198	199,307	50,249	57,020	51,909	25,638	81,998	646,834	564,835
M56 J4	112,365	42,618	9,440	188,121	43,512	40,893	48,071	21,850	149,214	656,085	506,871

Figures show a calculation of the annual one-way mileage travelled from the Import Centre location to each of eight regional distribution centres in proportion to population. Product is assumed to be imported by container through Liverpool2 docks. The example assumes 100,000 delivered pallets per year .

# Categorisation of Sites as an Import Centre (via Liverpool2)

Junction	Category
M6 J23	GOLD
M62 J5	GOLD
M6 J24	GOLD
M62 J9	GOLD
M6 J21	GOLD
M62 J8	GOLD
M6 J26	GOLD
M62 J7	GOLD
M62 J6	GOLD
M6 J20	GOLD
M62 J4	GOLD
M62 J11	SILVER
M6 J22	SILVER
M56 J11	SILVER
M56 J10	SILVER
M6 J25	SILVER
M6 J19	SILVER
M56 J12	SILVER
M56 J7/8	BRONZE
M6 J18	BRONZE
M6 J17	BRONZE
M56 J6	BRONZE
M56 J14	OTHER
M56 J5	OTHER
M56 J3	OTHER
M6 J16	OTHER
M56 J16	OTHER
M56 J4	OTHER



Categorisation compared to Best: GOLD < 2%, SILVER < 5%, BRONZE < 10%, OTHER > 10%

# Comparison of Distance Travelled from Key Ports to RDCs

Number of Miles Travelled from Port to RDCs									
Port	RDC Location								Total
	Cambridge	Portbury	Stretton	Leatherhead	Birmingham	Pontefract	Glasgow	Washington	
Liverpool	127,464	48,612	20,638	208,583	55,836	55,527	47,437	24,191	588,288
London Gateway	43,281	43,993	142,926	44,196	76,659	118,346	91,519	41,479	602,398
Bristol	117,398	949	103,554	107,229	51,395	120,225	81,834	41,920	624,504
Southampton	88,602	28,577	144,412	65,772	77,614	139,502	95,520	46,449	686,447
Felixstowe	48,111	58,588	157,750	101,071	88,532	122,664	93,085	42,493	712,294
Teesport	131,560	70,441	90,306	246,570	96,720	46,105	42,603	5,934	730,237
Newcastle	150,029	77,774	109,129	271,600	111,795	63,494	35,727	1,640	821,188

Parameters	Based upon total volume of 100,000 pallets / year								
RDC Factor	16.42%	6.52%	16.73%	22.25%	13.40%	15.46%	5.60%	3.63%	
Pallets / Trip	25	25	25	25	25	25	25	25	
Pallets / Year	16,416	6,517	16,730	22,246	13,399	15,456	5,604	3,630	100,000

Figures show a calculation of the annual one-way mileage travelled from each deep water port location to each of eight regional distribution centres. Product is assumed to be imported by container through each port and transported to each RDC in proportion to population. The example assumes 100,000 delivered pallets per year .

The analysis shows that Liverpool has the lowest road based cost for national distribution from the UK's deep water ports. Given the attractiveness of Liverpool as a port to feed into a national distribution network, the benefits in terms of cost and carbon footprint will reflect positively on the Six 56 site and enhance its potential role as an import centre.

# Client Considerations – Types of Companies

This section of the Study describes some of the likely types of end users who should be attracted to the Six 56 site.

## Companies with a Network of Regional Warehouses (90 minutes stem drive time)

- Grocery retailers (eg Asda, Tesco, Waitrose)
- Non grocery retailers, including electrical and fashion (eg John Lewis)
- Food and drink wholesalers
- General wholesalers
- Parcels hub (eg DPD, Parcelforce, UPS)
- E Commerce hub (eg Amazon, DHL, Hermes)
- If national, could have 6-10 sites around the country

## North West Manufacturing Companies wishing to Operate a National Distribution

- Local food and drink producers (eg Kelloggs, Heinz, Princes, Halewood, Interbrew, Diageo)
- Local non food manufacturers (eg Astra-Zeneca, Unilever)

## Importers (via Liverpool)

- Irish food and drink producers (eg Diageo, Glanbia, Oaklands)
- Imports from USA, Canada and S America
- Raw materials and ingredient suppliers
- Imports on behalf of retailers (eg Adidas, Asda, Asos, John Lewis, Primark)

## Companies undertaking Local deliveries (45 minutes stem drive time)

- Any company undertaking “last-mile” deliveries
- Home grocery delivery (eg Amazon Fresh, Ocado, Waitrose)
- Home non grocery delivery (eg Amazon, John Lewis)
- Parcels depot (eg DPD, Parcelforce, UPS)
- If national, could have 20-25 sites around the country

# Client Considerations – Sizing of Facilities

The ideal sizing of a client or end user facility will depend upon the scale and type of business. Some general estimates are:

## Regional Warehouse or Hub

- 150,000 – 300,000 sqft (14,000 – 28,000sqm)
- 10 – 15 acres (4 – 6 hectares)
- 10-20 metres high

## Large Regional / National Warehouse or Hub

- 250,000 – 800,000 sqft (24,000 – 75,000sqm)
- > 15 acres ( > 6 hectares)
- 10-40 metres high, dependent upon the level of automation

## Local Warehouse or Fulfilment Hub

- 50,000 – 150,000 sqft (5,000 – 14,000sqm)
- 5 – 10 acres (2 – 4 hectares)
- 8-10 metres high
- For small fulfilment hubs there is a proportionately larger requirement for vehicle parking



# Conclusions

Based upon the detailed modelling and analysis undertaken within the Study, Six 56 ranks highly when compared to other sites and locations. The main observations are:

1. Six 56 is located near the centre of the North West's motorway network, which means that the geographical area that can be covered within a particular drive time zone is large, when compared to other locations
2. Six 56 is located near the centre of the high population belt of Liverpool, Warrington and Manchester. This means that the extensive drive time area contains a large population of potential customers
3. With the exception of South East England, the North West has the highest level of population accessible within a 90 minute drive time. This makes it a prime location for regional distribution centres. Within the North West region, Six 56 is one of the top locations
4. Six 56 is a prime site to locate an Import Centre linked to Liverpool2 docks. The Import Centre could be considered as a stand alone site or its role could be combined with providing regional distribution
5. When compared to other deep sea ports, Liverpool2 has the minimum road transport costs to a network of regional distribution centres supporting their individual customer bases. This should add to the credentials of Six 56 as a good location in terms of sustainability
6. Six 56 is an excellent location to operate local or "last-mile" distribution and utilise sustainable electric vehicles
7. Given its location, Six 56 has an excellent catchment area for recruiting staff