

Langtree Property Partners

# Warrington Local Plan Examination

Hearing Statement – Matter 3

July 2022



# 01 Introduction

## Introduction

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- 1.1 This is a Hearing Statement prepared by Spawforths on behalf of Langtree Property Partners (Langtree) in respect of:
  - Matter 3: The Spatial Strategy
- 1.2 Langtree has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- 1.3 The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Langtree's comments upon the Warrington Local Plan 2021-2038 Submission Version, dated November 2021.
- 1.4 Langtree has also expressed a desire to attend and participate in Matter 3 of the Examination in Public.

# 02 Matter 3 – The Spatial Strategy

## Issue

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- 2.1 Whether the Spatial Strategy is justified, effective and consistent with national policy, including in terms of the distribution of development across the Borough, site selection, the overall approach to the Green Belt and the overall approaches to infrastructure provision and viability.

## Questions

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### Housing: Overall Spatial Strategy for housing

**Question 1: Is the strategy to maximise the development potential of the existing urban area for new housing appropriate and justified?**

- 2.2 Langtree do not have any comments on this particular issue.

**Question 2: Is the Council's assessment of urban capacity for the plan period (11,785 homes) realistic and justified by evidence? Has the development potential of the existing urban area been maximised, for example in terms of specific identified sites, an allowance for smaller sites and optimising densities?**

- 2.3 Langtree do not have any comments on this particular issue.

**Question 3: On a strategic, Borough wide level, does the scale of housing growth required, the capacity of the existing urban area and the inability of neighbouring authorities to accommodate any of Warrington's housing needs provide the exceptional circumstances to justify altering the Green Belt in principle?**

2.4 Langtree considers the level of housing required within the Borough and that neighbouring authorities are unable to accommodate any of Warrington's housing need is sufficient justification in demonstrating exceptional circumstances for altering the Green Belt.

**Question 4: What is the basis for a flexibility allowance of 10% in terms of the housing requirement? Is this justified?**

2.5 Langtree considers 10% flexibility allowance is entirely appropriate and reflects Best Practice. Such an allowance provides the flexibility required to allow for potential slippages in site delivery and changes in circumstance and to still plan robustly for the long term.

**Question 5: What is the basis for the removal of land from the Green Belt to accommodate at least 4,821 homes in the plan period (see Policy DEV1) given the figure of 4,372 in Table 1 of the Local Plan, particularly as 10% flexibility has already been factored in?**

2.6 Langtree do not have any comments on this particular issue.

**Question 6: In terms of high level options for Green Belt release, what is the basis for the chosen approach i.e. the majority of Green Belt release adjacent to the main urban area with incremental growth in outlying settlements? Why was this chosen ahead of other options? Is this justified?**

2.7 Langtree is concerned that Appleton Thorn, as a significant Outlying Settlement, has not received any new housing allocations within the Local Plan. Appleton Thorn is adjacent to significant existing and proposed employment, however the supporting evidence does not indicate the reasoning or what alternatives have been considered to support the housing need and housing provision in Appleton Thorn up to 2038.

**Question 7: What is the basis for the overall split of housing allocations and Green Belt release between land adjacent to the main urban area (at least 4,020 homes in Policy DEV1) and outlying settlements (at least 801 homes in Policy DEV1)? Is this justified?**

- 2.8 Similar to Langtree's response to Question 6, Langtree consider there should be new housing identified within Appleton Thorn, which is the only Outlying Settlement within the Borough to not receive any new housing.

## **Housing: Outlying Settlements**

**Question 8: How were the site allocations in the outlying settlements selected, what factors were used to assess potential sites and what criteria were used?**

**Question 9: What evidence fed into this process e.g. Green Belt Assessment, flood risk data etc?**

- 2.9 As stated earlier, Langtree is concerned that Appleton Thorn as a significant Outlying Settlement, which is in a sustainable location adjacent to employment parks but that it has not been identified to accommodate any new housing. The supporting evidence to the Plan does not indicate the reasoning or what alternatives have been considered to support the housing need and housing provision in Appleton Thorn up to 2038.

**Question 10: How has the process been recorded and documented? What role did the SA have?**

- 2.10 Langtree do not have any comments on this particular issue.

**Question 11: Which options were considered, why were alternative options discounted and why were the site allocations chosen?**

- 2.11 Langtree's response to Question 11 and the site selection process for the Outlying Settlements is provided in response to Question 12 below.

**Question 12: Was the methodology applied to site selection appropriate and were the conclusions of the process justified?**

- 2.12 Within Langtree's original representations, Langtree highlighted issues with housing land supply, spatial distribution of housing and that Appleton Thorn as an appropriate sustainable settlement adjacent to significant employment should accommodate some new housing. Langtree's site at Appleton Thorn should therefore be identified and released from the Green Belt.
- 2.13 Appleton Thorn is one of the larger settlements in Warrington. However there is no proposed new housing within it in the emerging Local Plan. Appleton Thorn was included when the Garden Suburb was larger, however when this was revised to the smaller South East Warrington Urban Extension any new housing within the settlement was removed. Langtree's site at Arley Road, Appleton Thorn was removed from the Plan along with any new housing within the settlement.
- 2.14 Appleton Thorn is an eminently sustainable Outlying Settlement. The settlement has significant employment opportunities with Appleton Thorn Trading Estate, Barley Castle Trading Estate and HM Prison Thorn Cross all within or immediately adjacent to the settlement. Appleton Thorn has schools and some services and facilities, including public transport routes.
- 2.15 Furthermore, the proposed allocations for settlements should consider the functional role of settlements and the location of the site. The Arley Road site is within an area close to employment opportunities, services and facilities. It is a very sustainable location for new housing being adjacent to new employment opportunities and being able to co-locate jobs and homes.
- 2.16 The range and choice of new housing within Appleton Thorn should be addressed given the significant employment opportunities nearby. To not identify any new housing within Appleton Thorn could be detrimental to the area, particularly with the ability to bring forward a proportion of new affordable housing within the settlement.
- 2.17 Langtree therefore consider that their site at Arley Road, Appleton Thorn should be identified for housing to address this disparity.

**Question 13: Is the scale of housing growth in each of the outlying settlements justified?**

- 2.18 Langtree considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.
- 2.19 Langtree is concerned that Appleton Thorn as a significant Outlying Settlement, which is in a sustainable location adjacent to employment parks but that it has not been identified to accommodate any new housing. The supporting evidence to the Plan does not indicate the reasoning or what alternatives have been considered to support the housing need and housing provision in Appleton Thorn up to 2038.

- 2.20 Langtree suggests that their site at Appleton Thorn should be identified as a housing allocation given its sustainable location and proximity to services and facilities, including significant employment opportunities and jobs.

## Employment land

**Question 19: What is the basis for the calculation of the existing supply of employment land within the Borough? What was included and excluded? Is the approach robust and justified?**

- 2.21 Langtree do not have any comments on this particular issue.

**Question 20: Is it justified to include 31.80ha from the Omega Extension in St Helens in the supply for Warrington? Should a greater area be included given that consent has now been granted for 75ha?**

- 2.22 As stated in response to Matter 2, the April 2022 updated Duty to Cooperate Statement (SP7a) explains on page 4 that “both authorities will continue to have dialogue as appropriate about the additional employment land available at Omega west, and the SoCG will be updated to reflect this”.

- 2.23 The April 2022 Statement of Common Ground (SP10) states in paragraph 4.11 and 4.12 that in principle the westward extension of Omega that is within the St Helens administrative boundary will contribute to meeting Warrington’s employment land needs, subject to resolving access issues.

- 2.24 Agreement 3 and 11 state:

*WBC has agreed, in principle that the western 31.2 hectare extension of Omega in St Helens, as defined in the St Helens Local Plan Submission Draft (site 1EA, Omega South Western Extension, land north of Finches Plantation, Bold), will contribute to meeting Warrington’s employment needs.*

*WBC will continue to liaise with St Helens over the apportionment of the element of employment land at Omega west, which benefits from the planning consent issued by the Secretary of State in November 2021, but is above and beyond the 31.2ha proposed to be allocated in the St Helens Borough Local Plan.*

- 2.25 Langtree considers that this agreed position reaffirms that there needs to be flexibility in the Plan. Langtree considers that this flexibility can be provided through the identification of Six 56 Phase II as safeguarded land for long term development.



**Question 21: On a strategic, Borough wide level, does the scale of employment land required and the existing supply (within Warrington and at the Omega Extension in St Helens) provide the exceptional circumstances to justify altering the Green Belt in principle?**

- 2.26 As stated in response to Matter 5, Langtree consider that there is a national imperative to facilitate and deliver economic growth in the United Kingdom. This economic imperative is embedded within national planning policy through The Framework. Paragraph 8 of The Framework establishes the three overarching objectives of the Planning system, economic, social and environmental. The economic objective is concerned with ensuring 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. Paragraph 80 seeks to ensure that policies and decisions create the right conditions in which businesses can invest, expand and adapt. The Framework considers that an area should build on its strengths, counter any weaknesses and address the challenges of the future. Furthermore, The Framework confirms that the specific locational requirements of different sectors should be recognised and addressed by policies and decisions, this includes making provision for “storage and distribution operations at a variety of scales and in suitably accessible locations”.
- 2.27 The Government is also committed to a rebalancing agenda whereby it is seeking to “level up” economic growth and overcome regional disparities in order to allow the North of England to realise its potential. The Industrial Strategy – Building a Britain Fit for the Future, aims to create an economy that boosts productivity and earning power throughout the UK. The Northern Powerhouse forms part of the Government’s Industrial Strategy and has an objective to achieve a sustained increase in productivity across the whole of the North of England. The Northern Powerhouse Strategy seeks to achieve this aim through improvements in connectivity; addressing the disparity in skills; ensuring that the north is an excellent place to start and grow a business; and promoting trade and investment across the north.
- 2.28 Warrington continues to be one of the UK’s most successful economic engines and a driver of growth at the heart of the Northern Powerhouse. Warrington Means Business (2020) the economic growth strategy for the area highlights 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. Although the Town Centre will meet some of this demand, there is still a need to provide in excess of 350 ha of new large scale employment areas for the future”.
- 2.29 Warrington, unlike other Authorities in the area, has had a proactive approach to the release of strategic sites to meet logistics and employment need. The Omega site is testament to this approach, which has come forward steadily since 2013 with a combination of speculative and built to order units and is now effectively complete within 8 years and permission granted by Secretary of State for the Omega West extension. This strategic site has meant that the market has been less constrained in Warrington compared to other Authorities where land supply was constrained by planning policy. In this context the take up rates are an appropriate starting basis within Warrington to reflect future need for employment land.



- 2.30 The Economic Development Needs Assessment for Warrington has been undertaken by BE Group, who also undertook the Employment Land Needs Study for St Helens. The methodology BE Group followed in St Helens is similar to that adopted in Warrington. The Inspector in St Helens endorsed the approach for utilising take up rates in deriving the employment land requirement recognising that when sites are available they come forward for development.
- 2.31 Furthermore, the St Helens Inspector also recognised that the PPG refers to the need to allocate space for logistics, and the specific needs of the logistics sector, such as the requirement for a significant amount of land at suitably accessible locations. The Inspector also highlighted that the continued interest from developers for large scale sites suitable for logistics warehousing near the M6 and M62 motorway intersection, is anticipated to sustain this demand, with further growth in the sector during the Plan period. The two planning applications at Haydock that have been granted, along with the two applications at Omega and Parkside recently granted by the Secretary of State, all reinforce the picture of strong developer interest for large scale sites suitable for logistic warehousing in St Helens that are close to the strategic motorway network. This is anticipated to fuel a period of further growth in demand and that given that parts of the strategic motorway and rail network pass through the area, it is well placed to meet this demand.
- 2.32 Appended to the hearing statement is an Economic Need and Demand update prepared by B8 Real Estate (Appendix 1) which shows that take up rates within the region have been increasing and there is no sign of this abating. The assessment highlights the latest CBRE research, take-up in H1 of all Grade A facilities above 100,000 sq. ft. reached 22.56M sq. ft. across 80 deals to 64 different occupiers which shows a wider mix of occupiers securing units. This represented a 10% increase on the previous record of 20.5M sq. ft. achieved in H1 2021.
- 2.33 Langtree consider that the employment land need provides exceptional circumstances to justify altering the Green Belt.

**Question 22: How were the Main Development Areas for employment (SE Warrington Employment Area and Fiddlers Ferry) selected, what factors were used to assess potential options and what criteria were used?**

- 2.34 Langtree consider that it is reasonable to identify large scale sites to meet the identified employment land needs as the need is for logistics and storage and distribution, which have specific site requirements. As stated earlier, the appendix to the Six 56 Planning Statement includes a JLL and Model Logic report, which includes an analysis of need and motorway junctions shows that there is a critical need for these sites. This evidence also shows that within the right locations the market will take up a site.
- 2.35 Furthermore, the Core Strategy sets out the key growth locations which include the South East Warrington Employment Area (Barley Castle) and therefore this area already is the next logical location now that Omega allocation is complete.
- 2.36 Therefore, with Omega West being delivered and Six 56 being deliverable and having a resolution to grant planning permission this endorses the analysis in the Economic Development Needs Assessment.

- 2.37 The site is controlled by Langtree and is therefore **available** for development. The technical information and Environmental Impact Assessment that accompanies the planning application, which has a resolution to grant planning permission, demonstrates that the site is **achievable**.
- 2.38 The **suitability** of the site is supported by the Council's evidence, which identifies the locational needs of the B8 strategic sector as being in South East Warrington. The Council's 2021 Economic Development Needs Assessment grades the site A+ and is the highest ranked employment site within the study.
- 2.39 The EDNA explains that the site's "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 benefited 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." This analysis flows through the study highlighting that the site has limited constraints and is available immediately. The site is therefore suggested to be Option One for a new allocation to meet the identified employment need.
- 2.40 Six 56 has all the attributes and 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.
- 2.41 The EDNA is clear that any new warehouse and distribution sites should be able to accommodate large regional and national production/distribution facilities of 5-10 ha in size and equally be able to accommodate the very largest logistic operators. From the Council's evidence base, it is evident that there are no sites outside of the Green Belt that could meet this requirement.
- 2.42 In comparison to other potential sites, Six 56 scores strongly. It will provide 64.74 ha of employment land and can accommodate a range of distribution facilities. The site has the potential to deliver nearly 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.
- 2.43 The Six 56 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.
- 2.44 The proposed site is generally flat and expansive with no topographic constraints and is capable of 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. The planning application seeks to establish means of access and is guided by a series of parameters.
- 2.45 The site is accessible to the supporting supply chain and is close to an established employment area and an area of population and is also close to the proposed new South Warrington Urban

Extension. The site's proximity to a suitable population centre is critical 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.

- 2.46 The land is also readily available and is under the control of willing landowners. All these attributes are key drivers for businesses when making decisions on locations for new employment space, in particular logistics operators. The allocation of the South East Warrington Employment Area is therefore available, suitable and achievable and is therefore deliverable and attractive to the employment market.

**Question 23: What evidence fed into this process e.g. Economic Development Needs Assessment, Green Belt Assessment etc?**

- 2.47 Langtree do not have any comments on this particular issue.

**Question 24: How has the process been recorded and documented? What role did the SA have?**

- 2.48 Langtree do not have any comments on this particular issue.

**Question 25: Which options were considered, why were alternative options discounted and why were the Main Development Areas for employment chosen?**

- 2.49 As highlighted in response to Question 22, Matter 5 and Matter 6f the South East Warrington Employment Area stems from the Core Strategy and scores highly in the Economic Development Needs Assessment as the next location for employment growth in the Borough. This is supported by significant evidence on need and the site is available, suitable and achievable with an accompanying planning application and resolution to grant planning permission for the northern parcel known as Six 56.

**Question 26: Was the methodology applied appropriate and were the conclusions of the process justified?**

- 2.50 Langtree consider that the process in identifying the South East Warrington Employment Area is entirely appropriate. As highlighted in response to Question 22, Matter 5 and Matter 6f the Core Strategy sets out the key growth locations which include the South East Warrington Employment Area (Barley Castle) and therefore this area already is the next logical location now that the Omega allocation is complete. Furthermore, the Economic Development Needs Assessment grades the site A+ and is the highest ranked employment site within the study. A planning application has been submitted on the northern portion of the site (Six 56), which has a resolution to grant planning permission and Cheshire East has granted planning permission for the ecological mitigation.

- 2.51 The site is available, suitable and achievable and is able to be delivered. The conclusions of the site allocation process are therefore entirely reasonable and justified.

## The Green Belt

### Question 27: Should the Local Plan identify safeguarded land? If so, where and for what purpose?

- 2.52 Langtree consider that safeguarded land should be identified in the Local Plan. Langtree question whether the Local Plan is looking too short term rather than as the Vision states beyond 2038, as the Council is not identifying future locations for growth for long term employment land.
- 2.53 The Council acknowledges within the supporting justification that insufficient employment land is being identified for the Plan period with an 8 hectare shortfall. The Council seek to address this through the Omega Phase 2 scheme, which is located in St Helens and was allowed by the Secretary of State in their Call-In decision on 11<sup>th</sup> November 2021. The Council indicate that if this were approved they would seek an agreement with St Helens that some of that scheme is meeting the needs of Warrington. Part of the Omega site is the subject to the Duty to Cooperate Agreement between St Helens and Warrington but part is not. There is no guarantee that this additional land will count towards Warrington's supply (as it is located within St Helens).
- 2.54 As stated in response to Matter 2 the April 2022 updated Duty to Cooperate Statement (SP7a) explains on page 4 that "both authorities will continue to have dialogue as appropriate about the additional employment land available at Omega west, and the SoCG will be updated to reflect this".
- 2.55 The April 2022 Statement of Common Ground (SP10) states in paragraph 4.11 and 4.12 that in principle the westward extension of Omega that is within the St Helens administrative boundary will contribute to meeting Warrington's employment land needs, subject to resolving access issues.
- 2.56 Agreement 3 and 11 state:
- WBC has agreed, in principle that the western 31.2 hectare extension of Omega in St Helens, as defined in the St Helens Local Plan Submission Draft (site 1EA, Omega South Western Extension, land north of Finches Plantation, Bold), will contribute to meeting Warrington's employment needs.*
- WBC will continue to liaise with St Helens over the apportionment of the element of employment land at Omega west, which benefits from the planning consent issued by the Secretary of State in November 2021, but is above and beyond the 31.2ha proposed to be allocated in the St Helens Borough Local Plan.*
- 2.57 Langtree considers that this agreed position reaffirms that there needs to be flexibility in the Plan and the identification of Six 56 Phase II as safeguarded land for long term development to provide flexibility within the Plan give this scenario

- 2.58 Local Plans should be planned positively and should meet identified needs now. The Plan strategy explains that a review of Warrington’s employment land will be undertaken before the end of the Plan period to identify future locations of growth. The Plan is therefore not identifying sites to come forward later on in the Plan, or safeguarded sites. However, there is no explanation or justification for this approach, especially as there is a perfectly reasonable site at Six 56 Phase II which could be safeguarded for long term employment land.
- 2.59 The Framework states that safeguarded land should be identified to meet longer term development needs well beyond the Plan period. The Council states within the Local Plan that other areas for employment land within the Borough have been considered but will not be allocated or safeguarded at this stage, but will be considered through an early review of the Plan. Langtree does not consider this addresses the Framework in relation to long term permanent Green Belt boundaries and demonstrating that Green Belt boundaries will not need to be altered at the end of the Plan period.
- 2.60 Langtree has highlighted in their original representations and in response to Matter 6c some delivery timescale concerns with regards to Fiddlers Ferry. The EDNA highlights these concerns scoring the site as only B- and as the fourth option, below Six 56 Phase II, to accommodate the future employment growth of the Borough. The Council’s own evidence shows the site constraints and that the site is not broadly available until 2027. Nevertheless, the Council’s evidence indicates this is ambitious and that the site is not likely to be available until 2030, which is considered more likely. Langtree understands that this site is a regeneration opportunity and that Peel Group are now involved, however there should be a fall back alternative position (Six 56 safeguarded land site) if this site does not come forward as expected.
- 2.61 It is Best Practice therefore to have sites in reserve, such as safeguarded land, which can be brought forward to address any shortfalls in provision. It would seem a logical starting point in the absence of clear guidance to ensure that the level of safeguarded land is sufficient to ensure that development needs can be met for a period of at least 15 years post adoption, this necessitates the need for safeguarded land to provide for an appropriate buffer. The PAS ‘good plan making guide - question and answers’ section<sup>1</sup> states that safeguarded land should be ‘considered beyond the 15 years of the plan... the notion is to make any changes to the Green Belt more permanent, i.e. probably two plan lifespans’. This approach aligns with the current Framework which recognises the need for longer term visions. It would appear sensible given the Framework’s requirements for permanence well beyond the Plan period to consider the merits of safeguarding sufficient land for two Plan periods (30 years).
- 2.62 The Cheshire East Local Plan Strategy identifies circa 200 hectares of safeguarded land across a range of towns. The Inspector’s report concluded:

*“Policy PG4 sets out the CEC’s approach to identifying Safeguarded Land, confirming that development will not be permitted in such areas unless it is justified through a review of the CELPS, and designated the sites identified as Safeguarded Land...The CELPS-PC proposed*

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<sup>1</sup> Good Plan Making Guide - PAS <https://www.local.gov.uk/sites/default/files/documents/principle-2-95a.pdf>

*to release some 200 ha of land from the Green Belt for Safeguarded Land in the north of the Borough, which is justified in the supporting evidence (STA) [PS/E031a5]; various options for the distribution of Safeguarded Land were also considered by CEC. The overall amount of proposed Safeguarded Land is intended to meet longer-term development needs stretching well beyond the end of the current plan period; in fact, taking account of other sources of land, it should be sufficient for another full 15-year period beyond 2030, so that the Green Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045.*

*Some participants are concerned that the overall amount of proposed safeguarded Land is inadequate to meet future development needs, but as confirmed in my Further Interim Views (appendix 2), I consider CEC has taken a balanced and cautious approach to the amount of Safeguarded Land to be identified which seems to be logical, rational, effective and justified by the supporting evidence; CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land. Since then, no new evidence has been presented to alter this conclusion”*

- 2.63 This is also reinforced recently in St Helens, which is an adjacent authority with a similar need, where the Inspector states with regards to safeguarded land that “the Plan needs to achieve a balance between protecting Green Belt and ensuring that Green Belt boundaries do not need to be altered again at the end of the Plan period”. The Inspector concludes that the 85ha of safeguarded employment land “achieves an appropriate quantum of safeguarded land and demonstrates exceptional circumstances”.
- 2.64 This conclusion was reached in an authority (St Helens) which does not presently have a shortfall in employment land against the identified need. Furthermore, St Helens has not stated within its Plan that it will undertake a review in the short term with regards to employment land and in response to suggested sites that can address the shortfall that it will be undertaking a short term employment land review. This highlights and further reinforces the need for safeguarded land and enduring Green Belt boundaries in Warrington.
- 2.65 Langtree considers that sufficient safeguarded land should be identified in the Local Plan to ensure that Green Belt boundaries will endure and provide permanence in the long term. In line with the PAS guidance this should constitute at least 15 years’ worth of employment and housing provision. Although safeguarded from development, safeguarded sites are generally considered to be the next pool of sites for consideration as they are excluded from the Green Belt. As such they can also be considered reserve sites, if allocations do not proceed as expected, as they have already been considered through a Green Belt Review and site assessment.
- 2.66 Furthermore, as highlighted earlier the Council states in response to Langtree’s suggestion for safeguarded land to be identified for employment land that the Council is “committed to undertaking a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land”. Given the Council’s commitment to the review of employment land supply safeguarded land should be identified immediately.
- 2.67 However, there is no trigger mechanism through Policy M1 to undertake an early review of employment land, if necessary. This will be explored further in response to Matter 14. This also reinforces Langtree’s concern that there is no safeguarded land for employment within the emerging Local Plan.

- 2.68 Langtree therefore suggest the Six 56 Phase II, as shown on the attached plan (Appendix 2), should be safeguarded for long term development. A slightly larger site was reviewed through the EDNA and was the second most suitable site for employment, scoring A-. The only reason for rejection was that the site was in multiple landownerships. This slightly smaller site is controlled by Langtree and should be identified for the second phase of Six 56.
- 2.69 The Council incorrectly state in the assessment of the site in the Local Plan Omission Sites document that “The development of the site could not be supported by current highways access arrangements and would require supporting infrastructure to mitigate the impacts on the local and strategic road network”. The attached Curtins report (Appendix 3) demonstrates that the highway improvements planned as part of the South East Warrington Employment Area and with a resolution to grant through the Six 56 planning application and the wider highway improvements planned with WBC highways and National Highway at M6 Junction 20 that these will all benefit Six 56 Phase II. There are therefore no highway constraints that preclude the site from being identified as safeguarded land.
- 2.70 The Council state that the site will be considered through the employment land review before the end of the Plan period. Langtree consider the site is available, suitable and achievable and is therefore deliverable, in accordance with national policy and guidance and should be identified as safeguarded land for long term development immediately.

**Question 28: What is the basis for the inset settlements (excluded from the Green Belt) and Green Belt settlements (washed over)? Is the list of settlements in each category justified in each case?**

- 2.71 Langtree do not have any comments on this particular issue.

**Question 29: In other respects, is the approach in Policy GB1 justified, effective and consistent with national policy? Are any main modifications necessary for soundness?**

- 2.72 Within the context of Langtree’s response to Question 27 the approach of Policy GB1 is incorrect. Part 1 of Policy GB1 states that the general extent of the Green Belt is set through the Plan to at least 2050. However, as highlighted earlier the Plan states that the employment land will be reviewed before the end of the Plan period, which is currently 2038. This statement is inconsistent and does not reflect the strategy or evidence of the Plan.
- 2.73 This is reflected in the reasoned justification paragraph 5.1.19 which recognises the uncertainties over the longer term employment land supply and that an early review of the Plan is likely to be required.
- 2.74 Langtree therefore considers that Six 56 Phase II should be safeguarded for long term employment development within this Local Plan Review.



## The overall approach to infrastructure

**Question 30: What are the overall infrastructure requirements as a result of the proposals in the Local Plan? How have these been established and in particular how has the Council worked with other organisations?**

2.75 Langtree do not have any comments on this particular issue.

**Question 31: What role does the Infrastructure Development Plan have and how does it relate to the Local Plan? How will the Infrastructure Development Plan evolve over time?**

2.76 Langtree do not have any comments on this particular issue.

**Question 32: Is there a distinction between infrastructure which is essential for the proposed development to take place and desirable infrastructure?**

2.77 Langtree do not have any comments on this particular issue.

**Question 33: How have costs for infrastructure been established? What are the sources of funding and is this sufficiently clear? Where there is a significant funding gap, how will this be met, is this clear and is it realistic?**

2.78 Langtree do not have any comments on this particular issue.

**Question 34: In overall terms, is it sufficiently clear that essential infrastructure will be provided and delivered at the right time?**

2.79 Langtree do not have any comments on this particular issue.

## Viability

**Question 35: Is the methodology used for the Viability Assessment of the Local Plan appropriate and robust?**

2.80 Langtree raised some queries in relation to the Viability Appraisal in their original representation. Langtree support the overall conclusions, however in relation to the South East Warrington Employment Area there is an over emphasis on additional utilities and strategic infrastructure costs, which does not reflect the proposals.

**Question 36: Does it provide a realistic and comprehensive assessment of revenue and costs for the Main Development Areas and site allocations over the plan period?**

2.81 As stated in response to Question 35, Langtree support the overall conclusions of the Viability Appraisal, however in relation to the South East Warrington Employment Area there is an over emphasis on additional utilities and strategic infrastructure costs, which does not reflect the proposals.

**Question 37: Are all costs included and are the estimates of these justified? How have infrastructure requirements been factored in and how do these correspond to the Infrastructure Development Plan and costs identified in that?**

2.82 Langtree do not have any comments on this particular issue.

**Question 38: What is the basis for the assumptions regarding the phasing of development and the timing of the need for and costs of infrastructure and are these realistic and justified?**

2.83 Langtree do not have any comments on this particular issue.

**Question 39: How do the assumptions on housing delivery compare with the housing trajectory?**

2.84 Langtree do not have any comments on this particular issue.

## Proposed Change

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**2.85** To overcome the soundness matters Langtree proposes the following changes:-

- Identify Six 56 Phase II as safeguarded land for long term development.
- Allocate Arley Road, Appleton Thorn for residential development.

# Appendix 1

A Rose Esq.  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

13 July 2022

SJ/RD

**By email:** [REDACTED]

Dear Andy

### **Six 56, Warrington – Economic Need & Demand**

Further to our recent conversation, I write to provide you with an occupational update on the logistics and industrial market covering Warrington and the wider North West region following on from the JLL Proof of Evidence dated December 2020.

#### **Take-Up**

2021 saw continued strong demand across the North West region for all units above 90,000 sq ft with a record take-up of 6.20M sq ft across 31 transactions. Compared to the 5 year average of 4.51M sq ft, this represented a 38% increase and a 16% increase on the total take-up recorded in 2020. Design and build along with speculative new build units accounted for 3.9M sq ft across 18 transactions representing 52% of overall take-up.

Over the year, the largest proportion of transactions were in the 90-200,000 sq ft size range (18 transactions/58%) and 50% of speculative new build units were let before practical completion highlighting the strong demand for new build accommodation. E-commerce/logistics were the dominant sector within the North West big box market accounting for 70% of overall take-up. However the manufacturing sector increased to 1.88M sq ft (8 transactions) and totalled 30% of all activity, a notable rise from 2020 figures of just 5% which in our opinion is a consequence of Brexit with occupiers looking to guarantee their future supply chain.

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Notable transactions during 2021 included the following:

- K800, Knowsley Industrial Park – 650,000 sq ft design and build let to Amazon
- Academy, Knowsley Industrial Park – 110,000 sq ft spec unit let to Unilin
- Unit 2 Mount Park II Omega, Warrington – 203,180 sq ft spec unit let to Amazon
- Panattoni Park, Wingates, Bolton – 280,700 sq ft spec unit let to EUS
- Omega 88, Warrington – 88,200 sq ft spec unit let to UPS
- Panattoni Park, Crewe – 305,360 sq ft spec unit let to AO.com
- Unit 3 Mountpark II Omega, Warrington – 225,180 sq ft spec unit let to Amazon
- Metro 190, Trafford Park – 190,000 sq ft spec unit let to the Fragrance Shop
- Liberty Park, Widnes – 108,091 sq ft spec unit let to Intertape Packaging

The take-up figures up to the end of H1 2022 have seen a further increase with 6 month take-up of 4.19M sq ft which represents a 25% increase on H1 2021. Speculative new build and design and build transactions accounted for nearly 80% of all take-up totalling 3.57M sq ft across 11 transactions signifying a clear shift to quality with occupiers looking to modernise their real estate. There were a number of notable characteristics to the H1 2022 take-up compared to previous years highlighted by the following:-

- There were 3 large-scale transactions between 505,000 sq ft and 878,000 sq ft showing an increased trend towards larger 'super sheds' procured on a design and build basis.
- All bar one of the spec lettings achieved were exchanged prior to units being completed.
- None of the transactions concluded where to Amazon, reinforcing the diverse nature of the sector and not being dominated by Amazon compared to previous years.

The regional position is very similar to the National picture where according to the latest CBRE research, take-up in H1 of all Grade A facilities above 100,000 sq ft reached 22.56M sq ft across 80 deals to 64 different occupiers which shows a wider mix of occupiers securing units. This represented a 10% increase on the previous record of 20.5M sq ft achieved in H1 2021.

Similar to the regional picture, 42% of national take-up in H1 2021 was to on-line retailers (with the vast majority of that accounted for by Amazon) whereas in H1 2022 this has reduced significantly to 13.6%. Manufacturing accounted for 15%.

## **Pipeline**

Given the unprecedented levels of take-up, there are currently only 2 fully available spec buildings across the whole of the North West regional totalling 382,000 sq ft one of which has recently gone under offer (Super W in Warrington 244,000 sq ft)

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Notable North West transactions during H1 2022 have included the following

- Omega, Warrington – 878,000 sq ft land sale to Home Bargains
- Omega, Warrington – 505,000 sq ft design and build let to Iceland
- Widnes 400, Gorsey Point – 393,000 sq ft spec unit let to the NHS
- Stakehill 185, Manchester – 185,000 sq ft spec unit let Fanatics
- Monarch 330, Kingsway Business Park, Rochdale – 328,000 sq ft spec unit let to Danish Crown
- Hooton Park, Ellesmere Port – 668,000 sq ft design and build to Stellantis
- Pioneer Point, Ellesmere Port – 92,000 sq ft spec unit let to Bargain Max
- Widnes 258, Gorsey Point, Widnes – 258,000 sq ft spec unit let to Kammac
- Alpha 167, Lingley Mere, Warrington – 168,159 sq ft spec unit let to Sykes Seafood

With the aforementioned recent transactions to Home Bargains and Iceland at Omega (St Helens) there are now only 2 plots remaining . One plot of 315,000 sq ft is reportedly under offer to The Hut Group on a design and build basis which leaves one final plot of 420,000 sq ft where initial feasibility for a speculative unit is being considered.

7 units totalling 2.06M sq ft are currently under construction and due to complete before the year end. These range in size between 107,000 sq ft and 655,000 sq ft none of which are in the Warrington Borough. 2 of these units are already under offer with advanced discussions under way on another 3. A further 4 units totalling 941,000 sq ft which have yet to PC have already exchanged.

Looking ahead, 13 units totalling just under 3M sq ft and ranging in size between 105,000 sq ft and 557,000 sq ft have either secured detailed planning or are looking to achieve in the near future with a view to commencing construction in Q3/4 2022. Again none of these are in the Warrington Borough.

The fact that none of the 7 units under construction and 13 proposed are in Warrington highlight the need for further land to be brought forward to cater for the current demand in the North West's prime location.

### **Future Land Supply**

As detailed in the previous JLL Proof of Evidence, whilst a number of key strategic sites are now in the process of being brought forward, there is in our opinion more than sufficient occupier demand to satisfy the majority of those schemes suitable for industrial and logistics development.

We conservatively estimate that there is currently circa 10M sq ft of occupier led requirements looking for warehousing and industrial space across the region between 100,000 – 500,000 sq ft. The majority of these are seeking Grade A speculative space and therefore given the proposed current pipeline there is a significant imbalance between this anticipated demand and current supply particularly bearing in the lack of stock in the Warrington Borough.



Warrington has consistently been regarded as the North West's prime location for logistics and distribution being at the epicentre of the region located midway between the commercial centres of Liverpool and Manchester and intersected by to the regional motorway network of the M6 and M62. This has been further reinforced by the success of Omega which has seen over 4.2M sq ft developed over the last 10 years. We are therefore of the opinion that Warrington Borough will benefit tremendously from a further key strategic site, as in the majority of cases occupiers will look to be positioned in a prime location.

As has been illustrated in a number of recent transactions over 500,000 sq ft, there are an increasing number of occupiers looking for larger facilities to consolidate operations and benefit from economies of scale. A number of the sites in neighbouring authorities can only offer single buildings up to a certain size limit of 300 – 400,000 sq ft. Six 56 is potentially able to offer a single unit of 1M sq ft and a further unit of 866,000 sq ft which places it in a relatively unique position.

### **Six 56 – Masterplan**

The current masterplan for Six 56 illustrates a proposed scheme of 7 units totalling just under 3.1M sq ft ranging in size from 96,000 sq ft to 1,001,325 sq ft. The scheme has been designed with current occupier requirements in mind by providing cross docked layouts on units 2 and 4 with 50m yards on the remaining buildings; ample loading doors and trailer parking; industry standard car parking requirements; flexible office content and appropriate building ratios to maximise internal layout.

Furthermore we assume that appropriate ESG will be implemented as part of any proposed development.

We believe that Six 56 offers an ideal range of unit sizes covering not only the traditional core demand between 100,000 – 350,000 sq ft but also large scale requirements which as detailed previously are becoming increasingly relevant.

### **Conclusion**

The key points which we believe highlight the need and justification for Six 56 are as follows:-

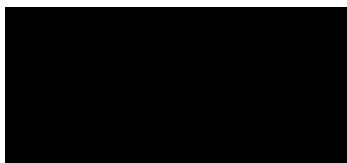
- Increasing demand for logistics and industrial space which has seen record levels of take-up year on year
- On-line shopping still only represents less than 30% of all retail spend and therefore we predict this market will continue to grow along with increasing demand from the manufacturing sector as a result of Brexit and occupiers wishing to safeguard future supply chain.
- Warrington is regarded as the prime location for industrial and logistics throughout the North West region proven by the success of Omega.
- Occupier requirements are growing and therefore whereas previously 100,000 sq ft would have been considered a large scale development, we are now seeing transactions between 500,000 – 800,000 sq

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ft. These larger buildings clearly have an increased footprint and there are a limited number of sites capable of accommodating units of this size.

Kind regards

Yours sincerely

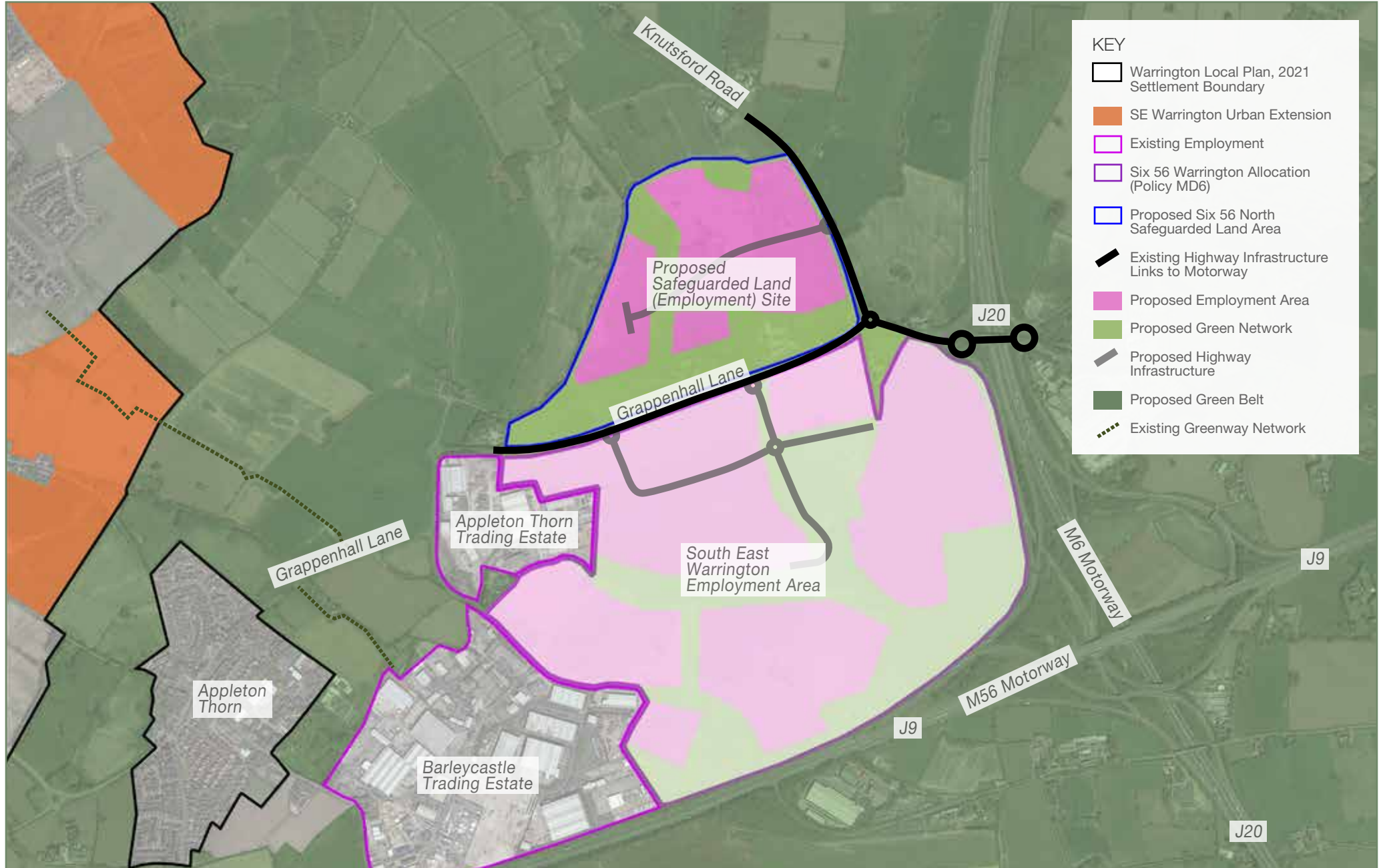


**Steve Johnson BSc (Hons) MRICS  
Director**

**cc: J Downes Esq. Langtree**

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# Appendix 2



# Six 56 Phase II

# Appendix 3

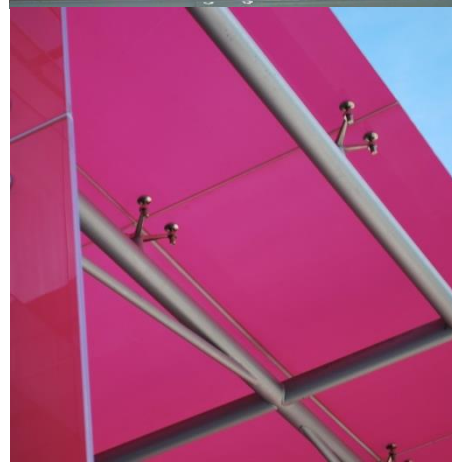
# Six56 Phase II

## Transport Hearing Statement

Curtins Ref: 082023-CUR-XX-XX-T-TP-00002

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## Control Sheet

Rev	Description	Issued	Checked	Date
P01	First issue	AV	AV	08 July 2022
P02	Final issue	AV	AV	20 July 2022

This report has been prepared for the sole benefit, use, and information for the client. The liability of Curtins with respect to the information contained in the report will not extend to any third party.

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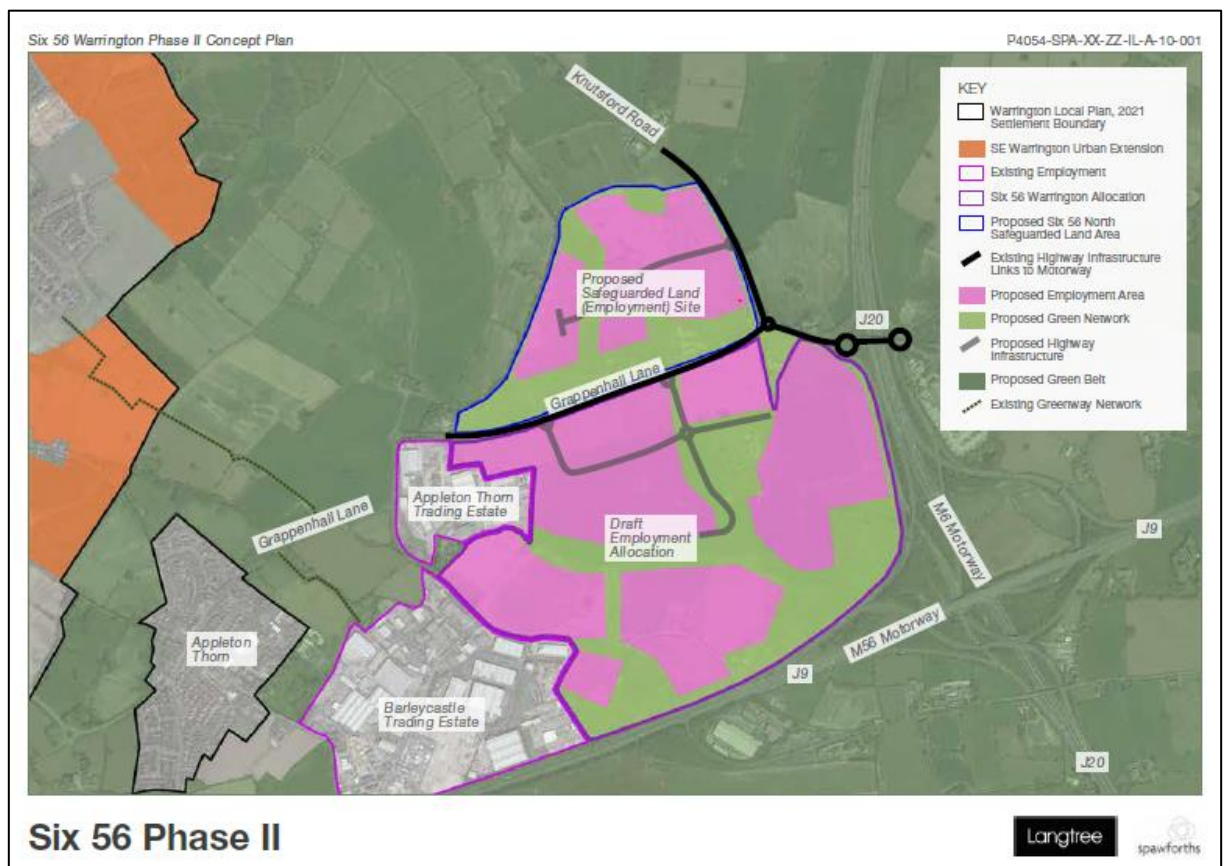
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## 1.0 Introduction

### 1.1 Introduction

1.1.1 Curtins has been appointed on behalf of Langtree PP to provide traffic and transportation advice in relation to the site that is included as Policy MD6 in the Warrington Updated Proposed Submission Version Local Plan 2021-2038. This is considered in Curtins' report, document reference: 082023-CUR-XX-XX-T-TP-00001-P02\_FR.

1.1.2 In addition, Curtins are instructed to assist in relation to the promotion of land immediately to the north of the South East Warrington Employment Area, as shown in blue on the below plan. The site is known as Six 56 Phase 2.



**Figure 1.1 – Six 56 Phase 2 Site Location Plan**  
(Source: Langtree, 2022)

### 1.2 Purpose of the Report

1.2.1 This document is a Hearing Statement, prepared for the Local Plan Examination, which focuses solely on traffic and transport matters relating to Six 56 Phase 2.

1.2.2 It seeks to respond to the Warrington Borough Council (WBC) response on the Omission Site Profile which states the following:

*“The development of the site could not be supported by current highways access arrangements and would require supporting infrastructure to mitigate the impacts on the local and strategic road network.”*

### 1.3 Background

1.3.1 Curtins was first commissioned by Langtree PP in 2016, to consider the feasibility of development of a site known as Six 56 as shown indicatively below.



**Figure 1.2** – Six 56 Site Location Plan  
(Source: Google Maps, 2016)

1.3.2 In 2019, an outline planning application (2019/34799) was submitted as per the below description:

*‘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.’*

1.3.3 The application was supported by a Transport Assessment, Framework Travel Plan, and Traffic and Transport ES Chapter that considered all highways matters in a comprehensive manner. No objections were received from either WBC Highways or National Highways (formerly known as Highways England), subject to mitigation.

- 1.3.4 The application was considered by Warrington Borough Council (WBC) on 10<sup>th</sup> March 2022 and received resolution to grant approval subject to signing of a Section 106 Agreement and a review by the Secretary of State. At the time of writing, the decision still sits with the Secretary of State.
- 1.3.5 The remainder of the Site is known as Land at Barleycastle Lane (the ‘Liberty’ site), which was subject to a separate planning application for 59,010m<sup>2</sup> of logistics development (2017/31757 & 2019/34739). The Liberty site is shown indicatively below:



**Figure 1.3** – Liberty Site Location Plan  
(Source: Google Maps, 2016)

- 1.3.6 The Six 56 transport documentation considered the Liberty application site as a sensitivity test.
- 1.3.7 This Statement draws on the Six 56 transport documentation, consultation response, and committee report to demonstrate the suitability and deliverability of the Site.

## 2.0 Deliverability of Six 56 Phase 2

### 2.1 Introduction

- 2.1.1 As set out in the introduction, planning applications for both the Six 56 site and the Liberty site have been prepared and submitted. Neither received any objection from either WBC Highways or National Highways, subject to mitigation secured by planning condition or obligation.
- 2.1.2 The Six 56 application was the most recent, and this considered the highway impact of both applications as a sensitivity assessment.
- 2.1.3 A summary of the transport analysis which supported the Six 56 application is provided below to demonstrate that traffic and transport matters in the vicinity of Six 56 Phase 2 have already been considered in detail, and many of the same conclusions would apply.

### 2.2 Site Location and Highway Network

- 2.2.1 The Six 56 Phase 2 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.
- 2.2.2 The M56 motorway and M6 motorway interchange (Junction 20 and 20A of the M6 and Junction 9 of the M56) 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, providing 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.
- 2.2.3 Having a major motorway interchange providing access to the north, east, south, and west adjacent to the Site, makes the site ideally suited to serve the logistics industry and the movement of goods across the North West, Midlands, and further afield.
- 2.2.4 The Six 56 Phase 2 site is considered to benefit from the same locational advantages as the South East Warrington Employment Area.

### 2.3 Accessibility by Sustainable Modes

- 2.3.1 A key element of the National and Local policy is to ensure that new developments are located in areas where sustainable modes of travel are available. In this instance, the primary complementary land uses are residential areas where the local labour force is likely to reside.



- 2.3.2 It is acknowledged as part of the Six 56 application that the site has limited potential to attract trips by non-car modes of transport based on existing infrastructure. However, there were 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 development linked to the Local Plan.
- 2.3.3 A comprehensive Travel Plan was also proposed along with a Steering Group comprising of public and private sector representation to address transportation issues and maximise sustainable transport initiatives through the development build-out period and beyond. Agreement was reached for the Council's Smarter Travel Choices Manager to operate the plan, which allows a co-ordinated approach to securing appropriate, successful, and sustainable transport solutions throughout the area. Individual units would also be required to produce bespoke plans that would tie into this wider approach; this can be ensured by condition.
- 2.3.4 With regard to accessibility and sustainability, it was concluded that the Six 56 site represents sustainable development in accordance with policies MP1, MP3 and MP4 of the Local Plan, Paragraph 11 of the NPPF and the 'presumption in favour of sustainable development', Paragraphs 102, 108, 110 of the NPPF, and Policy MD6 in the Submission Draft of the Local Plan.
- 2.3.5 Given the location of the Six 56 Phase 2 site immediately to the north of the Six 56 site, it is considered that the site would benefit from many of the sustainable transport improvements that are to be delivered by the Six 56 site and the wider South East Warrington Employment Area. This includes new pedestrian and cycle infrastructure, new bus infrastructure, new bus services, and the establishment of a Transport Steering group and Travel Plan.
- 2.3.6 Additional improvements could also be secured by the Six Phase 2 development itself, based on the results of any Transport Assessment. As the landowner controls land that abuts the adopted highway on the A50 Knutsford Road / Cliff Road, there are numerous opportunities for carriageway widening and / or the provision of new pedestrian / cycle infrastructure.

## **2.4 Means of Access**

- 2.4.1 It is proposed that the Six 56 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. WBC offered no objection to the proposals; therefore the access is considered to be realistic, deliverable, and compliant with Para 108 of the NPPF and Policy MD6.
- 2.4.2 The same form of access arrangement could easily be accommodated along the circa 500m frontage that exists on the eastern boundary of the Six Phase 2 site. There is also ample space for a priority-controlled junction, traffic signals, or multiple access points.

2.4.3 Based on a site visit and the findings of the Six 56 Transport Assessment, there is nothing to suggest that access from the east would not be deliverable.

## 2.5 Highway Safety

2.5.1 The Six 56 TA considered highway safety in the vicinity of the site for the period 2013 to 2018. This review concluded that:

*“there does not appear to be a common pattern of contributory factors of accidents recorded in this area.....None of the contributory factors recorded relate to the features of the highway, instead it is mainly environmental factors and driver errors/impairment which are recorded as causes. It can be concluded that features of the highway at these junctions do not represent a specific safety issue.”*

2.5.2 The TA went on to acknowledge that:

*‘WBC Highways and HE reached the same conclusion when considering the adjacent Liberty development, as they offered no objection to the application.’*

2.5.3 WBC and National Highways both offered no objection to the application, and neither raised highways safety as a concern that would prevent deliverability of the Site.

2.5.4 The highway safety assessment considered the same area that would need to be considered for Six 56 Phase 2, therefore it is logical that the same conclusion would apply.

## 2.6 Traffic Forecasting

2.6.1 Section 6 of the Six 56 TA provides detail on how the traffic forecasts have been developed in a conventional manner. It states that:

*“As a result of scoping discussions with WBC Highways Officers and HE, a forecasting methodology has been agreed which utilises independent traffic surveys and stand-alone junction modelling software to consider key junctions in the immediate vicinity of the Site.”*

*This section of the report provides an estimate of the vehicular trips that might be generated by the development of the Site during the weekday AM and PM peak hours and over a normal weekday.*

*The chapter also sets out the methodology used to estimate the distribution of development-related traffic throughout the local road network and the assignment of trips in the appropriate assessment years.”*

2.6.2 It goes on to provide detail regarding traffic generation associated with both the Six 56 site and the Liberty application site, which was included as a sensitivity test. It also provides details of the traffic



surveys used to determine baseline flows, committed development, background traffic growth, distribution, and assignment.

2.6.3 The WBC final Highways consultation response states under the traffic forecasting section that:

*“The trip generation forecasts are based on traffic surveys undertaken at Omega North and are considered appropriate. The inclusion of the committed development sites and the background growth rates are also considered appropriate.*

*Traffic distribution of staff-related trips is based on journey-to-work data from the 2011 census and is considered appropriate.*

*The HGV traffic distribution assumptions are considered appropriate. It is noted that all HGV movements are assigned towards the M6 J20 which may mean that some localised movements to/from Warrington via the A50 are excluded; this is not considered material given the limited number of HGV movements that currently follow this routing and also allows for a more robust assessment of the locally critical junctions.*

*The even distribution of HGV movements between the two access points may not be realistic and will very much depend on the final internal layout, however, given that the modelling results of each access point highlights a free flow level of service and significant spare capacity it considered that the access principles are appropriate.”*

2.6.4 The above demonstrates that there is a well-defined methodology for agreeing parameters and determining future year traffic forecasts that is acceptable to both WBC Highways and National Highways. It is logical that this same methodology could be applied to Six 56 Phase 2 and should be acceptable all parties.

## **2.7 Capacity Assessments**

2.7.1 The parameters set out in Section 6 of the Six 56 TA were used to undertake junction modelling at six key locations. The full results are set out in detail in Section 8 of the Six 56 TA.

2.7.2 It is considered that the same approved traffic models could be used to consider the impact of Six 56 Phase 2, and this approach should be acceptable to both WBC Highways and National Highways.

2.7.3 The modelling results for Six 56 helped to inform the development of a mitigation strategy which primarily focused on the A50 / Cliff Lane roundabout and M6 Junction 20.

2.7.4 The proposals are shown on Drawing 64076-CUR-00-XX-DR-TP-75011/06 in the Six 56 TA and are summarised below:

- Relocation of the A50 Cliff Lane roundabout 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.
- Widening of the A50 link between the A50 Cliff Lane roundabout.
- Partial signalisation of the two M6 J20 dumbbell roundabouts.
- Widening of the M6 Northbound off-slip.
- Widening and improvement of the circulatory carriageway on the two M6 J20 dumbbell roundabouts.

2.7.5 An extract from Section 8.3 of the TA concludes that:

*“The results of the assessments demonstrate that the Site access points operate well within capacity in a future year of 2021 and 2029.*

*With regard to the M6 Junction 20, the results of the assessments demonstrate that there is appropriate mitigation for the A50 / Cliff Lane roundabout and M6 Junction 20 that achieves betterment when compared to the do-nothing scenario.”*

2.7.6 The above concludes that the mitigation proposed for Six 56 (which also considered the Liberty application) was sufficient to mitigate impacts at the key M6 Junction 20 and A50 / Cliff Lane roundabouts. The results even suggested the possibility of some limited betterment which may accommodate an element of the Six 56 Phase 2 site traffic.

## 2.8 Six 56 Mitigation

2.8.1 The committee report summarises the final WBC highways position for Six 56 and states in Section 6 that:

*“no objections subject to a S106 obligation requiring the following:*

- *Contribution of £400k to deliver a Council-led scheme to provide foot/cycleway infrastructure linking the site with Broad Lane and Barleycastle Lane*
- *Contribution of £600k to deliver a public transport service meeting the needs of the site and connecting with the wider area*
- *Contribution of £50k to deliver the operation of a Council-led strategic travel plan covering the entire site to promote and support sustainable travel initiatives for future occupiers*

*along with a number of conditions requiring off-site highway improvement works, further detailed highways specifications, road phasing, maintenance, highway improvement works, prevention of surface water discharge onto the highway, road gradients, parking and servicing, public transport*

*infrastructure, a construction management plan, travel plan coordinators and individual unit travel plans, a transportation steering group, servicing and waste management and electric vehicle charging.”*

2.8.2 The final National Highways consultation response also offered no objection subject to mitigation to be secured via condition. This position was also summarised in Section 6 of the committee report:

*“no objections subject to conditions requiring the submission of full details of improvements to junction 20 of the M6/A50/B51 158, including the provision of yellow box marking, full signing and lighting details, signal phasing, compliance with DMRB and a road safety audit and for those works to be implemented prior to first occupation, a detailed design and construction plan, details of fencing along the eastern boundary of the site to prevent pedestrian and vehicular access to the M6 and for no drainage to connect to the motorway drainage system.”*

2.8.3 On the basis that the Six 56 assessment captured the likely traffic associated with development of the Liberty application site, it is concluded that the identified Six 56 mitigation will offer benefit to the highway network and will ensure it operates in a safe and suitable manner without a severe impact in accordance with para 109 of the NPPF.

2.8.4 It is considered that this mitigation is likely to offer benefits for Six 56 Phase 2, especially from a sustainable transport perspective.

## **2.9 Additional Mitigation**

2.9.1 In addition to the Six 56 mitigation, it is understood that WBC Highways and National Highways are working on a larger and more comprehensive scheme of improvements for the M6 Junction 20 and associated A50 / Cliff Lane roundabout.

2.9.2 These improvements are listed on Page 12 of the WBC Infrastructure Delivery Plan prepared in 2019. There is limited detail, but there is reference to a £50,000,000 highways scheme.

2.9.3 As part of the Six 56 planning application discussions, Curtins is aware that WBC has been developing this scheme of works in conjunction with National Highways, and the works are intended to provide capacity on the network that far exceeds that delivered by the Six 56 mitigation.

2.9.4 It is understood that the package of works is likely to be delivered within the life of the Local Plan. The conceptual scheme is included in the Local Plan Evidence Base Document – *“Transport Model Testing of the WBC Local Plan August 2021”*, and this improvement coupled with improvements set out in Local Transport Plan 4 are predicted to enable further development in the area.

2.9.5 The mitigation may have potential to provide sufficient capacity to accommodate Six 56 Phase 2.

2.9.6 Furthermore, additional mitigation could be secured as part of any Phase 2 planning application.

## 2.10 Conclusion

2.10.1 In conclusion, the Six 56 planning application has demonstrated that there are a range of highway and sustainable transport infrastructure improvements that mitigate the impact of the development and offer benefits to the highway network.

2.10.2 Given the location of Six 56 Phase 2 site immediately adjacent to the Six 56 site, it is considered that many of the improvements will also benefit Phase 2.

2.10.3 In addition, it is clear that WBC Highways and National Highways are pursuing highway improvements at the M6 Junction 20, and this has the potential to benefit Six 56 Phase 2.

2.10.4 Highway mitigation could also be secured as part of any planning application for Six 56 Phase 2.

2.10.5 On the above basis, Curtins would disagree with the WBC statement set out in the introduction and reproduced below.

*“The development of the site could not be supported by current highways access arrangements and would require supporting infrastructure to mitigate the impacts on the local and strategic road network.”*

2.10.6 Whilst current infrastructure in the vicinity of Phase 2 may be constrained, there is a significant package of mitigation proposed as part of Six 56, with further enhancements planned by the Local Highway Authority and potentially National Highways. All of this will benefit Six 56 Phase 2, and there is nothing from the Six 56 planning application to suggest that mitigation could not be delivered to accommodate Six 56 Phase 2.

# Our Locations

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## Kendal

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## Leeds

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## Liverpool

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## London

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## Manchester

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## Nottingham

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