PROOF OF EVIDENCE

OF

DAVID ROLINSON

PLANNING MATTERS

Langtree Property Partners LLP

Called-In planning application for the Land to the west of Junction 20 of the M6 Motorway and Junction 9 of the M56 Motorway and south of Grappenhall Lane and Cliff Lane, Grappenhall, Warrington

LOCAL PLANNING AUTHORITY APPLICATION REFERENCE: 2019/34799

SECRETARY OF STATE'S REFERENCE: PCU/CONS/H4315/3244681

PLANNING INSPECTORATE'S REFERENCE: APP/M0655/V/22/3311877

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

Report Author	D Rolinson
Report Date	March 2023
Project No.	4055
Document Ref.	P4055-SPA-RP-TP-0030
Revision	C

Contents

1. Qualifications and Experience 4

2. Factual background 6

3. Approach to my Evidence 8

4. Compliance with the Development Plan 12

'*Most Important*' CS Policies 15
Other '*Relevant*' CS Policies 22
Appleton Thorn Neighbourhood Plan (ATNP) '*relevant*' policies 31
Conclusion 36

5. The Material Considerations 38

MC1 – The urgent need and demand for significant additional B8 land. 38
MC2 – The lack of alternative sites to meet the urgent need and demand. 45
MC3 – The locational advantages and deliverability. 46
MC4 – The economic benefits. 48
MC5 – The social benefits. 52
MC6 – The visual impact and effects on landscape character. 54
MC7 – The effect on ecology and bio-diversity. 56
MC9 – The effect on heritage assets. 60
MC10 – The effect on drainage and flood risk. 61
MC11 – The effect on air quality. 62
MC12 – The effect on residential amenity (noise and outlook). 62
MC13 – The effect on agricultural land. 63
MC14 – The effect upon Climate Change and Energy. 64
MC15 – The other North West Called in cases. 66
MC16 – The emerging Local Plan. 67
MC17 – The position of the Councils and Third parties. 70
MC18 – Planning conditions and section 106 agreement. 72

6. The Green Belt balancing assessment and "*very special circumstances*" 76

7. The Heritage balance. 90

8. Conclusions 92

9. Appendices 98

1. Qualifications and Experience

1.1. I am David Rolinson, and I am a Chartered Town Planner. I hold a BA Honours Degree in Town and Country Planning from Newcastle University and I am a Member of the Royal Town Planning Institute. I have also been awarded a Diploma in Planning and Environmental Law from Leeds University. I have over 35 years' experience in the planning profession. I have worked for the Public sector and in 1988, I joined Spawforths who are a multi-disciplinary consultancy (planning, architecture and masterplanning) and where I am now the Chairman and in charge of the Planning function.

1.2. My experience relevant to the Application proposals includes working as lead consultant on behalf of many employment and logistics developers in pursuing planning applications and appeals including in the North West, Yorkshire, and the North Midlands. On behalf of Langtree PP, I led the planning application and gave planning evidence at the Call-In Inquiry for the Parkside employment scheme in St Helens (CD4.126) which the Secretary of State granted on 11th November 2021, and I am now pursuing reserved matters applications and an application for phase 2 of this 2.7m ft. sq logistics scheme. I have also secured planning permission for other large scale employment developments in proximity to the Application Site at Basford West in Crewe and at the former Shell Complex in Carrington, Manchester. I also have extensive experience of working in Warrington, having recently secured planning permission (via appeal) for a new Motorway Service Area and separately for the residential redevelopment of the former Warrington rugby league stadium. I have also appeared as an Expert Witness in over 140 Development Plan, Section 78 Inquiries/ Hearings and CPO Inquiries.

1.3. I have been instructed by Langtree Property Partners LLP (the Applicant) regarding the Application Site since 2016. I was lead Planning Consultant for

the Outline Planning Application (OPA) for the Application Site (application reference: 2019/34799). I have visited the Application Site on numerous occasions since my instruction.

1.4. I understand my duty to the Inquiry and have complied with, and will continue to comply with, that duty. I confirm that this Evidence identifies all the facts which I regard as being relevant to the opinions that I have expressed and that the Inspector's attention has been drawn to any matter which would affect the validity of those opinions. I believe that the facts stated within this Evidence to be true and that the opinions expressed are correct.

1.5. I include my Summary Proof of Evidence as Appendix DR01.

2. Factual background

2.1. The details of the Application Site location, context and characteristics are set out in the Statement of Common Ground (SoCG) (paragraphs 2.1 – 2.4) (CD4.149) and my Factual Statement (CD6.10).

2.2. The Application proposals are made in outline with the description of development set out below.

> Outline application (all matters reserved except for access) comprising the construction of up to 287,909m² (gross internal) of employment floorspace (Use Class B8 and ancillary 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, accompanied by an Environmental Statement.

2.3. Details of the "*parameters*" which will control the nature of the Application proposals are set out in the SoCG (paras 3.1 to 3.5) (CD4.149) and my Factual Statement (CD6.10). My Appendix DR02 sets out the process of the consideration of the Application by the Local Planning Authority, which was thorough and comprehensive.

2.4. The statutory Development Plan for this Application comprises the Warrington Local Plan Core Strategy *('adopted'* July 2014) ('*CS*') (CD2.1) and the Appleton Thorn Ward Neighbourhood Plan ('*made*' June 2017) ('*ATNP*')

(CD2.3). The relevant CS and ATNP policies are agreed in the SoCG (CD 4.149) and I address compliance with them in Section 4 of my Evidence. I consider the compliance with the NPPF (21) (CD1.1) in Section 8 of my Evidence.

2.5. The Secretary of State called in the Application proposals by letter dated 22nd November 2022 (CD4.150). I assess the issues raised by the Secretary of State in Section 8 of my Evidence.

2.6. The key points from the Factual background that I wish to draw to the attention of the Inspector are:

- The Application Site is large (98 hectares), generally level and located adjacent to Junction 20 the M6 and Junction 9 of the M56.
- It is in an "*optimal*" location for logistics equi-distant from the key conurbations of Liverpool and Manchester and near Warrington and also located on the key north / south motorway corridor (M6).
- The OPA is the subject of "*parameters*" plans which control the quantum and distribution of development, and which minimise its impact upon environmental, heritage and technical matters along with minimising the impact upon its limited number of nearby residents. In this context, for a Site of its scale, it is free from delivery constraints.
- It is under the direct control of experienced Developers and hence it is capable of being delivered in the short term to meet identified need and demand.

3. Approach to my Evidence

3.1. In Section 4 of my Evidence I confirm that the Application proposals should be considered in line with the approach established by Section 70 of the Town and Country Planning Act 1990 (the determining authority should have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations); and to Section 38(6) of the Planning and Compulsory Purchase Act 2004 (determination must be made in accordance with the plan unless material considerations indicate otherwise). I therefore assess compliance with the '*relevant*' policies of both the CS (CD2.1) and the ATNP (CD2.3) and conclude that whilst there is some non-compliance with a limited number of policies, this non-compliance does not render the Application proposals non-compliant with the Development Plan '*as a whole*' as they accord with the majority of the '*relevant*' policies including the "*most important*" policies within the Development Plan. The Application proposals therefore comply with the Development Plan "*as a whole*" and hence there is a Section 38(6) presumption in their favour.

3.2. In Section 5 of my Evidence, I assess and ascribe weight to the *'material considerations'* (*'MC'*) which are relevant to the Application proposals, and I also consider whether any of them could outweigh this Section 38(6) presumption. These are as follows:

- MC1 – The urgent need and demand for significant additional B8 land in this area, sub-region and region.
- MC2 – The lack of alternative sites to meet the urgent need and demand.
- MC3 – The locational advantages and deliverability of the Site.
- MC4 – The economic benefits of the Application proposal.
- MC5 – The social benefits of the Application proposal.

- MC6 – The visual impact of the Application proposal and its effect on landscape character of the surrounding area.
- MC7 – The effect on ecology and bio-diversity.
- MC8 – The effect on traffic and transport.
- MC9 – The effect on heritage assets.
- MC10 – The effect on drainage and flood risk.
- MC11 – The effect on air quality.
- MC12 – The effect on residential amenity of nearby occupiers (noise and outlook).
- MC13 – The effect on agricultural land.
- MC14 – The effect upon Climate Change including waste, lighting and energy.
- MC15 – The other Secretary of State employment decisions in the North West.
- MC16 – The emerging Local Plan.
- MC17 – The position of the Councils and Third Parties.
- MC18 – Planning conditions and section 106 agreement.

3.3. I conclude that the need and demand for B8 warehouses and distribution and the lack of alternative sites to meet that need outside of the Green Belt are very significant and weighty considerations. Further I conclude that the locational advantages of the Application Site and its genuine delivery credentials are also very significant and weighty considerations. These are reinforced by the economic benefits of job creation (construction and operation), expenditure and valued added which are also very significant and weighty considerations. The Application proposals also deliver socio-economic benefits for the people of Warrington which are also very significant

and weighty and environmental benefits that are moderate positive considerations.

3.4. I consider that any non-Green Belt harm which relates to landscape, heritage, agriculture and air quality matters is in the range of "*limited*" to *"moderate / substantial*" in nature and of "*moderate"* weight in my overall assessment and that much of this harm can be reduced to *'limited'* at detailed design stage.

3.5. In Section 6 of my Evidence, I consider the "*Green Belt balance*" in which I assess of the effects of the Application proposals on the Green Belt. Within this assessment I accept that the Application proposals are "*inappropriate*" development and that there is harm to "*openness*" and one Green Belt "*purpose*" but that the harm to the Green Belt and any "*other harm*" are "*clearly outweighed*" by "*other considerations*" (benefits) which when taken together constitute *'very special circumstances'*. The "*other considerations*" (benefits) are those that I set out in Section 5. In line with paragraph 148 of the NPPF (21) I therefore consider that "*very special circumstances*" have been demonstrated to support the Application proposals.

3.6. In Section 7 of my Evidence, I consider the *"Heritage balance*" which comprises my assessment of the effects of the Application proposals on heritage matters. Within that assessment I accept that there will be harm to designated and non-designated heritage assets but that this will be "*less than substantial*" in nature. I consider that the "*other considerations"* that I set out in my Green Belt assessment equate to the "*public benefits*" and I conclude that the *"public benefits"* tests for both designated and non-designated assets are passed within the context of paragraphs 202 and 203 of the NPPF (21).

3.7. In Section 8 of my Evidence, I consider that in line with my assessments of the above key '*balancing*' exercises I conclude that the case in favour of the

Application proposal is compelling. I consider that meeting the needs of employment occupiers in the M6 corridor is fundamentally important to the regional and Warrington economy and that the location and scale of the Application proposals along with dearth of other alternative sites to meet these needs means that in my opinion, the Application proposals should be granted planning permission in line with the decisions of the Secretary of State in 2021 on four other key employment sites in the North West. I directly address the matters which are raised by the Inspector and Secretary of State, and I conclude that none of them undermine my conclusion.

3.8. I draw together my conclusions and confirm regarding Section 70 of the TCPA 1990 and Section 38(6) of the PCPA 2004 that the Application proposals comply with the Development Plan "*as a whole*" and that there are no other "*material considerations*" that would indicate that the Application proposals should not be determined in accordance with the Development Plan. I consider that because the Application proposals comply with the Development Plan then the "*presumption in favour of sustainable development*" as set out in NPPF (21) paragraph 11(c) applies. I further demonstrate compliance with NPPF (21) as a whole. I have also considered the "*Alternative Planning Balance*" if it is found that the Application proposals do not comply with the Development Plan, and I conclude that planning permission should still be granted because other "*material considerations*" outweigh any Development Plan breach.

4. Compliance with the Development Plan

4.1. The statutory framework for the consideration of the Application proposals is established by Section 70 of the Town and Country Planning Act 1990 (the determining authority should have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations); and by Section 38(6) of the Planning and Compulsory Purchase Act 2004 (determination must be made in accordance with the plan unless material considerations indicate otherwise).

4.2. I consider that whilst there is a need to assess compliance with individual '*relevant*' policies, 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, Tiviot Way Investments Ltd versus the Secretary of State for Communities and Local Government and Stockton-on-Tees Borough Council (CO/774/2015 EWHC 2489 (Admin) (2015)) (CD4.91) 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"*.

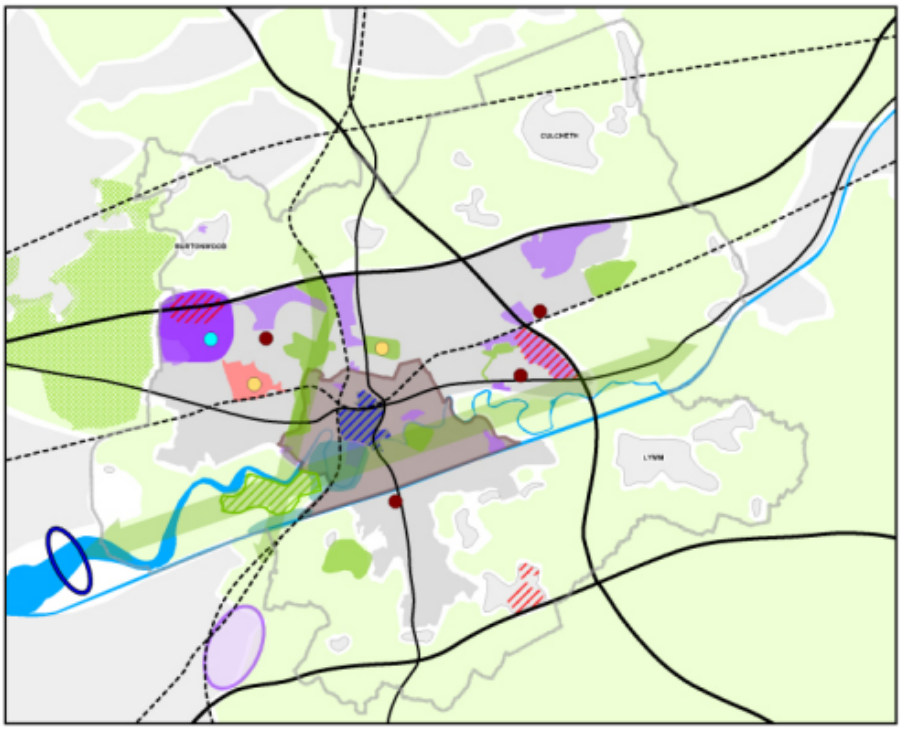
4.3. The concepts of '*relevant*' and '*most important*' policies are reinforced in the context of the presumption in favour of sustainable development NPPF (21) paragraph 11 (d). I consider that identifying a '*basket*' of policies that are the '*most important*' to the determination of an application is therefore essential when considering the application of the '*presumption*' and whether a Plan and its policies are '*up to date*'. Given the age of the Core Strategy (2014), I consider that paragraphs 218 and 219 of the NPPF (21) apply and hence I have also considered the degree of consistency of each Development Plan policy

with the NPPF (21) to allow me to ascribe what weight should be afforded to each of them. I do not regard the Core Strategy to be out of date as a whole, but I do assess each '*relevant*' policy individually.

4.4. The SoCG (CD4.149) sets out the "*relevant*" policies within both the CS (CD2.1) and ATNP (CD2.3). In my consideration of which are the '*most important*' policies, I have included those which relate to the economy and employment matters within Warrington. The Key Diagram on Page 21 of the CS (extract below) identifies the Application Site as being within the Green Belt (which is another '*most important*' policy), but it also identifies Barleycastle and Stretton Green Trading Estates which lie immediately adjacent to the Application Site as being "*preferred distribution locations*".

4.5. The Core Strategy sets out a series of '*Strategic Objectives'* which support the growth of the local and sub-regional economy (W1), maintenance of the permanence of the Green Belt (W2), accessibility (W4), and maintenance of the character of the countryside and protecting and enhancing the local distinctiveness (W5). In my opinion the Core Strategy policies that relate most closely to these '*Strategic Objectives*' in respect of the strategic needs for development, strategic distribution of development and locational characteristics should sit within the '*basket*' of '*most important'* policies. These comprise policy CS1 Overall Spatial Strategy - Delivering Sustainable Development; policy CS2 Overall Spatial Strategy - Quantity and Distribution of Development; policy CS4 Overall Spatial Strategy – Transport; policy CS5 Overall Spatial Strategy - Green Belt; policy PV3 Strengthening the Borough's Workforce; and policy CC2 Protecting the Countryside.

5 Key Diagram



- Suburban Areas
- Countryside Settlements
- Inner Warrington
- Town Centre
- Strategic Proposal: Omega & Lingley Mere
- Existing Employment Locations
- Preferred Office Location
- Preferred Distribution Locations
- Daresbury Employment Area (Outside Borough)
- Bold Forest Park (Outside Borough)
- Chapelford Urban Village
- Strategic Proposal: Waterfront & Strategic Opportunity: Port Warrington
- Mersey Gateway (Outside Borough)
- Potential Future Country Park
- Green Belt
- Major Parks / Green Infrastructure
- Strategic Green Links
- Existing Hubs and District Centres
- Proposed Hubs and Centres
- Potential Omega Hub

Figure 5.1 Warrington Local Plan Core Strategy Key Diagram

'*Most Important*' CS Policies

Policy CS1

4.6. Policy CS1 supports development proposals that are sustainable. The policy sets out a range of factors but there is no weighting or priority between them. Whilst the precise wording of the final paragraph of policy CS1 is not fully consistent with the NPPF (21) paragraph 11(d), I consider that the main approach of the policy is in conformity with NPPF (21) and hence I give full weight to this policy.

4.7. In Sections 5, 6 and 7 of my Evidence, I demonstrate that the Application proposals help to meet the provision for economic growth and help to meet identified development needs; and accord with national Green Belt and Heritage policy. The Officer's Report to Committee (ORC) (CD4.151) confirmed Green Belt compliance (paragraphs 10.22 and 10.367); compliance with biodiversity requirements (paragraph 10.171); heritage compliance (paragraph 10.362); and utility infrastructure compliance (paragraph 10.272). It confirmed in paragraph 10.368 that policy CS1 is one which the Application proposal accords with and which points in support of approval of the Application.

4.8. I agree with the conclusions of the ORC with respect to compliance with policy CS1. I accept that having regard to my analysis in respect of landscape (MC6), there will be partial non-compliance in respect of the impact upon the countryside (part of bullet point 3 of policy CS1) but I consider that subject to appropriate planning conditions to minimise that impact, the Application proposals comply with the provisions of policy CS1 as a whole.

Policy CS2

4.9. Policy CS2 establishes the Core Strategy's employment land requirement to 2027 (277 hectares) and the principles for the spatial distribution of development regarding employment. These principles include:

- Maintaining the general extent of the Green Belt "*for as long as can be seen ahead and at least until 2032.*"
- Development within the Green Belt will only be allowed where it is in accordance with national policy.
- Prioritisation of development on '*previously developed*' land.
- The main focus for other business, general industrial, storage and distribution will continue to be at existing employment areas.
- Major Warehousing and Distribution developments to 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.

4.10. I consider that policy CS2 is broadly consistent with NPPF (21) and with paragraph 83 of the NPPF (21) (CD1.1) as it recognises that major warehousing and distribution developments may come forward and it establishes the locational principles against which such applications will be determined. I ascribe full weight to these elements. In respect of Green Belt, the policy indicates that the detailed Green Belt boundaries will be maintained until at least until 2032 (i.e. five years beyond the Plan period) and it does not identify any Safeguarded sites. I consider that the aspects of the policy that relate to the maintenance of the general extent of the Green Belt boundaries to 2032 has limited weight, as the scale of need for new employment land

(Appendix DR03 and MC1), the lack of alternative sites to meet that need (Appendix DR05 and MC2), along with the locational advantages of the Application Site (MC3 and MC8) result in the need through the emerging Local Plan to change Green Belt boundaries to meet these employment needs.

4.11. With respect to the need for employment land the ORC (CD4.151) at paragraph 10.34 states that "*Adopted Policy CS2 considered that up to 277 ha of employment land would be sufficient over the plan period (2006 -2027). However the most recent evidence contained within the 2021 EDNA, as outlined above, demonstrates that this will be insufficient moving forward and there is only 38.87 ha of employment remaining in the borough, the strategic element of which is expected to be taken up imminently, In view of this and given that the adopted plan is only looking to 2027, it is considered that the content of Policy CS2, in this regard is not reflective of current employment land needs and that additional land is required to be brought forward to meet those needs*". In relation to the location of new employment sites away from areas sensitive to heavy vehicle movements with direct access to the Primary Road Network, the ORC considers compliance at paragraphs 10.104 and 10.105 and concludes that the Application proposals accord with policy CS2 in this respect.

4.12. I consider in Section 6 of my Evidence that '*very special circumstances*' exist to support the Application proposals and that they fully meet the locational requirements (MC8 and MC4) of policy CS2 as shown on the Key Diagram (for '*preferred distribution locations*'). I therefore conclude that the Application proposals are in general conformity with policy CS2 other than in respect of the timeframe for Green Belt change to which I ascribe limited weight.

Policy CS4

4.13. Policy CS4 identifies a range of transport initiatives and supports the need to reduce travel by car. It also refers to the distribution of development

established in policy CS2. I consider that the policy is compliant with the NPPF (21) and hence I ascribe full weight to it.

4.14. I consider matters related to traffic and transport, having regard to the evidence of Mr Alex Vogt (CD6.4) within my MC8, and the locational advantages of the Application Site within my MC3. I conclude that the Application site is extremely well located to meet the needs of employment occupiers. The SoCG (CD4.149) confirms that there were no objections to the Application proposals raised by the Local Highway Authority, or National Highways (subject to conditions and a section 106 obligation). Within the ORC (CD4.151) the Council concluded that there would not be a '*severe*' impact on the highway network, and that the Application proposals accord with policy CS4 subject to the conditions and the section 106 obligation (paragraph 10.105). I agree with these conclusions and confirm compliance with policy CS4.

Policy CS5

4.15. Policy CS5 confirms the same principle as with policy CS2 i.e. that the Council will maintain the general extent of the Green Belt until at least 2032. I have already considered this within my assessment of policy CS2 and for the reasons set out therein, I afford limited weight to this element of the policy. I have also demonstrated within my assessment of policy CS2 that the general extent of Green Belt will have to be altered before 2032.

4.16. Policy CS5 also confirms that development proposals within the Green Belt will be approved where they accord with relevant national policy, and I demonstrate within Section 6 of my Evidence that '*very special circumstances*' exist to support the Application proposals. This is supported in the ORC (paragraph 10.367) which concluded that the Application proposals accord

with policy CS5. I agree and conclude that the Application proposals comply with this policy as a whole.

Policy PV3

4.17. Policy PV3 provides policy support for developments that assist in strengthening the Borough's workforce and enhancing training opportunities for its residents. This is consistent with NPPF (21) (CD1.1) and accordingly the policy should be given full weight. I set out the significant benefits in terms of job creation, impact on the labour force and opportunities for training and apprenticeships and career progression that would be available to the local labour force (MC4 and MC5). At MC18 I set out the proposed measures to be included within the section 106 agreement that will maximise social benefits. I therefore conclude that the Application proposals comply with the requirements of Policy PV 3.

Policy CC2

4.18. Policy CC2 states that "*development proposals in the countryside which accord with Green Belt policies set out in national policy will be supported*" subject to criteria relating to: (1) to the siting, design, scale, layout and use of materials; (2) respecting the local landscape character (including on distant views and immediate impact); (3) unobtrusive provision for servicing, parking and equipment; (4) relationship to local enterprise and farm diversification; and (5) no detrimental impact on agricultural interests.

4.19. I consider that criteria 1-3 of policy CC2 are consistent with NPPF (21) and can be afforded full weight but that the fourth and fifth criteria are not wholly consistent with the NPPF (21), '*Section 6 – Supporting a prosperous rural economy*' as they are overly restrictive and do not fully reflect advice in paragraph 84 of the NPPF (21) (which supports the sustainable growth and

expansion of all types of business in rural areas) and hence which does not limit development only to local enterprise and farm diversification. Paragraph 83 of the NPPF (21) also seeks to ensure that planning policies recognise the specific locational requirements of different sectors, including storage and distribution. I therefore consider that limited weight should be afforded to the fourth and fifth criteria of policy CC2.

4.20. The ORC (paragraph 10.147) concludes that the Application proposals do not comply with the relevant criteria of policy CC2 relating to respecting local landscape character, given the significant adverse landscape effects that been identified. In respect of agricultural interests, the ORC concluded at paragraph 10.311 that the Application proposals would result in a loss of 24.65 ha of BMV and would not relate to local enterprise and farm diversification and that they would have a detrimental impact on agricultural interest due to the amount of agricultural land that would be lost. The ORC (CD4.151) therefore concluded that the Application proposals do not accord with the relevant criteria of policy CC2.

4.21. I consider policy CC2 in my evidence at MC6 with respect to the impact on landscape character, and at MC13, with respect to the effect on agricultural land. I consider that the Application proposals, subject to conditions, can comply with policy CC2 criteria 1 and 3 but I accept there would be some non-compliance with criteria 4 and 5 but I ascribe limited weight to these aspects of the policy. I also accept that the Application proposals do not fully comply with criterion 2 of policy CC2.

4.22. In conclusion on the compliance of the Application proposals with the "*most important*" policies of the Core Strategy, I summarise my position in my table below:

Most Relevant Policies in Core Strategy	Proposed Development Compliance with Policy	Weight
Policy CS1 - Overall Spatial Strategy - Delivering Sustainable Development	Fully Comply	Full
Policy CS2 - Overall Spatial Strategy - Quantity and Distribution of Development	General Compliance – the part of the policy that the Application proposal conflicts with does not accord with the NPPF (21) and hence limited weight is given to this conflict with this part of the policy.	Full – Limited in relation to Green Belt Boundary
Policy CS4 - Overall Spatial Strategy – Transport	Fully Comply	Full
Policy CS5 Overall Spatial Strategy - Green Belt	General Compliance - the part of the policy that the Application proposal conflicts with does not accord with the NPPF (21) and hence limited weight is given to this conflict with this part of the policy.	Full – Limited in relation to Green Belt Boundary
Policy PV3 Strengthening the Borough's Workforce	Fully Comply	Full
Policy CC2 Protecting the Countryside (Criterion 2)	Partial non-compliance.	Full

4.23. I consider that the Application proposals are generally compliant with the '*most important*' policies. Those policy strands which they are not fully compliant with relate to landscape and agriculture. Mr Taylor has confirmed that the landscape impact is localized as I set out in MC6. I cannot conceive how any large scale greenfield employment application could fully meet these policy strands. I therefore conclude that the Application proposals are compliant with the '*most important*' policies '*as a whole*' as they will deliver economic growth in a sustainable location, that is consistent with the provisions of policy CS2 and the Key Diagram relative to major distribution and warehousing. They also pass the '*very special circumstances*' test for '*inappropriate*' development in the Green Belt. Securing economic growth is a principal tenet that underpins the Core Strategy as set out in its Strategic Objectives and Green Belt land is required to achieve this.

Other '*Relevant*' CS Policies

Policy PV1

4.24. Policy PV1 sets out the approach to development within existing employment areas. The Core Strategy Key Diagram highlights the focus for major distribution and warehousing to be in the area adjacent to the Application Site and the policy also provides a criteria-based approach to supporting development of major warehousing and distribution developments outside of these areas. The policy directs such developments to Appleton & Stretton Trading Estates, Omega, and Woolston Grange and, where major warehousing and distribution developments are proposed outside these areas, they should be located away from areas sensitive to heavy vehicle movement and with direct access to the Primary Road Network. The Application proposals lie adjacent to the Appleton & Stretton Trading Estates and HGV traffic can be

directed onto the adjacent motorway and hence I consider that the Application proposals comply with policy PV1.

Policy SN7

4.25. Policy SN7 seeks to reduce health inequalities within the Borough and promote healthy lifestyles across all communities. The policy includes measures directly related to the town centre, inner Warrington and north Warrington which are not relevant to the Application proposals but the main thrust of the policy to reduce health inequalities is relevant and is consistent with the provisions of NPPF (21). I have considered the socio-economic benefits of the Application proposals and I have concluded that they will deliver significant positive benefits (MC4 and MC5) and an increase in employment and training opportunities. The ORC (CD4.151) concluded that the Application proposals would accord with Policy PV3 and SN7. I agree that the Application proposals comply with this policy.

Policy QE1

4.26. The main tenet of this policy is to maximise opportunities for the use of renewable and low carbon energy. I consider the effect on climate change and energy at MC14 and conclude that the Application proposals do minimise their effect upon climate change and their use of energy. The ORC considered compliance with these matters in paragraphs 10.283 -10.289 and confirmed that "*subject to the proposed conditions, the application is considered acceptable and in compliance with the relevant parts of the above policies".* I therefore conclude that subject to conditions, the Application proposals comply with policy QE1.

Policy QE3

4.27. Policy QE3 sets out the Councils approach to protecting and enhancing existing Green Infrastructure, including improvements to the functionality, quality and access and connectivity. The policy also seeks to secure the provision of new Green Infrastructure. The evidence of Mr. Taylor (landscape) (CD 6.2) and Ms. Seal (ecology) (CD6.6) consider the landscaping proposals and strategic landscaping to be delivered as part of the Application proposals which I consider at MC6 and MC7. The ORC at paragraph 10.147 states that "*it is considered that the proposal would not conflict with Policy QE3 and continued public access through the site would be facilitated via existing and diverted PRoWs.",* and at paragraph 10.171 *"subject to the above conditions and S106 obligation, it is considered that there would be no unacceptable impacts on ecological or biodiversity interests and the application accords with the above policies.".* I agree with the conclusions of the ORC and consider that subject to conditions and section 106 obligations, the Application proposals comply with policy QE3.

Policy QE4

4.28. Policy QE4 seeks to ensure that the Application proposals assess and take account of flood risk. The policy requires SuDS, compensatory and mitigation measures, flood resilience measures, and consideration of the impact of climate change. The Flood Risk Assessment and Flood Risk and Drainage Technical Paper 3 of the ES Part 2 (CD4.4) considers these matters in full. I consider Flood Risk and Drainage at MC10, and Climate Change at MC14. The SoCG (CD4.149) confirms in paragraphs 11.1 to 11.3 that the statutory consultees had no objections subject to conditions and that the Application proposals are acceptable. The ORC considered drainage and flood risk at paragraphs 10.106 to 10.120 and concluded at paragraph 10.120 that the Application proposals are in accordance with the relevant policies, including

policy QE4. I agree with this conclusion and consider that the Application proposals comply with policy QE4.

Policy QE5

4.29. Policy QE5 seeks to ensure that sites of recognised nature and geological value will be protected and enhanced, and it establishes the framework for assessing development proposals. Ms. Seal (CD6.6) addresses these matters which I consider at MC7. The ORC considered this at paragraphs 10.149 to 10.171 and concluded that *"subject to conditions and S106 obligation, it is considered that there would be no unacceptable impacts on ecological or biodiversity interests and the application accords with the above policies*". The SoCG confirms in paragraphs 12.1 that Natural England had no objections and that subject to conditions the Application proposals are acceptable. I concur with the conclusions of the ORC and the statutory consultee and conclude that subject to appropriate conditions and the section 106 obligation the Application proposals comply with policy QE5.

Policy QE6

4.30. Policy QE6 seeks to protect the environment and amenity of future occupiers or existing neighbouring occupiers. It sets out a series of environmental policy considerations which were fully assessed through the Environmental Assessment (CD4.1 and CD4.2) that supported the Application proposals and through the ORC. I consider that each environmental matters raised within the policy have been adequately considered and that suitable mitigation has been identified. I therefore conclude that the Application proposals, subject to suitable conditions and the section 106 obligation, comply with policy QE6.

Policy QE7

4.31. Policy QE7 seeks to secure high-quality places. The policy states that the Council will "*look positively*" at proposals designed to meet eight criteria but it does not indicate that applications will be refused where they do not fully meet all criteria. As the Application proposals are in outline form then several criteria identified within policy QE7 can only be fully satisfied through Reserved Matters applications. The submitted Design and Access Statement (CD4.36) addressed a number of these criteria and the evidence of Mr Taylor (CD6.2) addresses landscape matters (relative to bullet point 6). The ORC considered policy QE6 at paragraphs 10.123 to 10.148 and considered that "*the scheme is not considered to comply with the relevant criteria of Local Plan policy QE7 in respect of maintaining and respecting the landscape character of the surrounding countryside"*. I consider that subject to conditions, and subsequent Reserved Matters submissions, the Application proposals can comply with all bullet points except point 6 (landscape) for the reasons I set out in relation to policy CC2 and at MC6 of my Evidence. I therefore accept that the Application proposals are not in full compliance with policy QE7.

Policy QE 8

4.32. Policy QE8 aims to ensure the protection and enhancement of heritage assets. I consider the effect of the Application proposals on heritage having regard to the evidence by Mr McQueen (CD6.3) in my MC9. I also consider the '*Heritage balance'* in Section 7 of my Evidence and consider that it is passed.

4.33. The ORC considers compliance with policy QE8 at paragraphs 10.235 to 10.263 and confirms that there would be *'less than substantial'* harm to five heritage assets (paragraph 10.358). This remains the Councils position (SOCG, paragraph 8.4) (CD4.149). Page 24 of the ORC (CD4.151) confirms that Historic England raised no objections to the Application proposals and that

this remains the position as set out in the SOCG at paragraph 8.1 to 8.4. The ORC considers the '*heritage balance*' at paragraphs 10.358 to 10.362 and concludes that the weight of the '*public benefits*' outweighs the '*less than substantial harm*'. The effect on non-designated heritage assets is considered at paragraph 10.361, and the ORC concludes that the demolition of the agricultural building at Bradley Hall, is acceptable and "*the harm caused by its loss is outweighed by the benefits*". At paragraph 10.362, the ORC concludes that "*subject to the conditions mentioned in the heritage section of the report, the application is considered to accord with the Local Plan policies CS1, QE8 and Neighbourhood Plan Policy AT-D1.*" Mr MacQueen (CD6.3) sets out the justification for these conclusions in paragraph 8.7 of his evidence and I concur with this conclusion and consider that the Application proposals fully comply with this policy.

Policy MP1

4.34. Policy MP1 sets out general transport principles, seeking to reduce the need for private car use, and to ensure that the impact of development on the transport network is adequately mitigated. I consider transport matters at MC8 of my proof, having regard to the evidence of Mr Alex Vogt (CD6.4). The ORC confirms in paragraph 10.105 that subject to conditions and the section 106 obligation that the Application proposals comply with policy MP1. The SoCG confirms in paragraphs 7.1 – 7.2 that Warrington Council (as the Local Highway Authority) and National Highways had no objections subject to conditions and a section 106 obligation and that "*subject to conditions and S106 obligation there would not be a severe impact on the highway network*". Mr Vogt sets out the justification for these conclusions in detail in his evidence and I concur with this conclusion and consider that the Application proposals fully comply with this policy.

Policy MP3

4.35. Policy MP3 supports active travel and seeks to ensure that integrated networks of continuous attractive and safe routes for walking and cycling are enhanced and developed. The evidence of Mr Vogt (CD6.4) and my MC8 address this matter. The ORC considers compliance with policy MP1 and other transport policies in paragraphs 10.57 – 10.105, and with reference to active travel at paragraphs 10.80 – 10.81. It confirms in paragraph 10.105 that subject to conditions and the section 106 obligation that the Application proposal complies with policy MP3, and I concur with this conclusion.

Policy MP4

4.36. The intent of policy MP4 is to secure improvements to public transport infrastructure and services and consistent with the Spatial Strategy, to locate development in areas with easy access to public transport. The policy seeks to ensure that public transport is a viable option seeking developments to be integrated with the existing transport network, as far as possible, and providing additional public transport infrastructure. I have considered transport matters in MC8 having regard to the evidence by Mr Alex Vogt. The ORC considered transport policies at paragraphs 10.57 – 10.105 and considered public transport provision in paragraph 10.82. The ORC concluded at paragraph 10.105 that subject to conditions and the section 106 obligations, the Application proposals comply with policy MP4, and I concur with this conclusion.

Policy MP5

4.37. Proposals for freight related development are supported by policy MP5, where they achieve a reduction in road traffic and / or where they reduce the impact of freight traffic on local or inappropriate routes. The policy also encourages development which generates significant movement of freight to be located on

sites served by rail and or water, and where opportunities are not available the policy directs such development to be located where there is good access to the Primary Road Network. I consider the locational advantages of the Appeal proposals regarding the Primary Road Network at MC3, and I assess transport matters at MC8. I assess the lack of alternative sites in MC2 (and Appendix DR05), and I address the decarbonisation of freight in MC14 (and Appendix DR07). The ORC considers policy MP5 at paragraph 10.103. It is concluded that there are no sites available directly served by rail or water and that the Application proposals are located with excellent access to the Primary Road Network as considered by the ORC at paragraph 10.104. I therefore conclude that the Application proposals comply with policy MP5.

Policy MP7

4.38. Policy MP7 requires applications for major development uses to be accompanied by a Transport Assessment and Travel Plan. It considers that development proposals that prejudice the function of the Strategic Road Network will not be allowed, subject to suitable mitigation. I consider traffic and transport matters at MC8 and have regard to the evidence by Mr Alex Vogt (CD6.4). A Transport Assessment and Travel Plan accompanied the OPA as he sets out. The SoCG confirms that National Highways (paragraph 7.1) do not object to the Application proposals subject to conditions and the section 106 obligation. The ORC considers that the Application proposals comply with policy MP7 (paragraph 10.105). I agree with this conclusion.

Policy MP8

4.39. Policy MP8 promotes sustainable waste management in accordance with the waste hierarchy and it encourages waste minimization in new developments. Waste is considered in ES Technical Paper 11 (CD4.12) which includes appendices covering an outline site waste management plan and an outline

operation waste management strategy. Paragraph 10.282 of the ORC concludes that "*the submission of waste management plans/strategies can be controlled by condition and on this basis, the proposals is considered to accord with the above policies.*"[1] I agree with this conclusion.

4.40. I summarise my conclusions in the table below:

Relevant Policies in Core Strategy	**Proposed Development Compliance with Policy**	**Weight**
Policy PV1 Development in Existing Employment Areas	Fully comply	Full
Policy SN7 Enhancing Health and Well-being	Fully comply	Full
Policy QE1 Decentralised Energy Networks and Low Carbon Development	Fully comply	Full
Policy QE3 Green Infrastructure	Fully comply	Full
Policy QE4 Flood Risk	Fully comply	Full
Policy QE5 Biodiversity and Geodiversity	Fully comply	Full
Policy QE6 Environment and Amenity Protection	Fully comply	Full
Policy QE7 Ensuring a High Quality Place	Partial non-compliance (Criterion 6)	Full

[1] This includes policy MP8 as set out at paragraph 10.273.

Relevant Policies in Core Strategy	Proposed Development Compliance with Policy	Weight
Policy QE8 Historic Environment	Fully comply	Full
Policy MP1 General Transport Principles	Fully comply	Full
Policy MP3 Active Travel	Fully comply	Full
Policy MP4 Public Transport	Fully comply	Full
Policy MP5 Freight Transport	Fully comply	Full
Policy MP7 Transport Assessments and Travel Plans	Fully comply	Full
Policy MP8 Waste	Fully comply	Full

Appleton Thorn Neighbourhood Plan (ATNP) '*relevant*' policies

4.41. When considering whether any of the policies within the ATNP form part of the '*basket*' of '*most important*' polices, I have had regard to the relationship between the ATNP (CD2.3) and CS (CD2.1). The NPPF (21) (CD1.1) is clear that Neighbourhood Plans should support the delivery of Strategic Policies contained within Local Plans (paragraph 13); should not undermine those Strategic Policies (paragraph 29); and that they should just contain *'non-strategic'* policies (paragraph 18). Accordingly, the policies contained within the ATNP should be consistent with the Strategic Policies of the Core Strategy and be *'non-strategic'* in nature.

4.42. The Examiner's Report on the ATNP (CD4.96) at paragraph 40 accepted that at the time that the ATNP was being examined, the Council were undertaking

further work in relation to the review of the Core Strategy (emerging Local Plan) and that this could have implications for the ATNP. At the time of the Examination report, the Council were not able identify sufficient housing to meet identified needs. I consider that this shows that if there are changes in the strategic planning context since the ATNP was '*made*' then this will impact on whether the policies in the ATNP are still '*up to date*'. NPPG confirms that "*Policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after making of the neighbourhood plan. In such cases the more recent plan policies takes precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions as the evidence base for the plan policy becomes less robust" (my emphasis)* (paragraph 84 Reference ID 41-084-20190509).

4.43. Since the ATNP was '*made*' in February 2017, I consider that there have been significant changes to the context for employment requirements (the growth of e-commerce) and the strategic need for employment (especially logistics) as I set out at MC1, MC2 and MC3. These changes in circumstance since the ATNP was '*made*' are, in my view, a significant '*material considerations*' which reduce the weight to be attached to the ATNP policies as they do not fully reflect this evidence and hence the approach in the NPPF (21) especially paragraphs 81-83. Having regard to the reduced weight to be ascribed to the ATNP and the fact that its policies are *'non-strategic'* in nature then I do not consider that any of the policies contained therein are '*most important'* policies for the consideration of the Application proposals. Within this context I set out my detailed conclusions on compliance of the Application proposals with the ATNP.

Policy AT-D1

4.44. Policy AT-D1 relates to the design of development, and it seeks to ensure that new development makes a positive contribution to the distinctive character and for it to be of good quality design. This policy establishes a series of criteria against which new developments will be considered. I consider that the Application proposals are generally capable at Reserved Matters stage of complying with these criteria, but I accept that some of them relating to (e) impact upon character of the area; and (i) respecting local settings may be more difficult to achieve with the scale of the buildings proposed. The ORC considered compliance with AT-D1 criteria (g) (landscape design) and (i) (local settings) at paragraphs 10.147 and concluded that the Application proposals do not comply with them. I consider that the Application proposals comply with most elements of the policy, but I accept partial non-compliance with the criteria (e) and (i).

Policy AT-D2

4.45. The aim of Policy AT-D2 is to protect and enhance local landscape character and views. The ORC indicates in paragraph 10.147 that the Application proposals "*would not preserve the settings of open landscapes and would involve the siting of development where it would be unrelated to the majority of existing built development in the area or landscape features*". It also notes in paragraph 10.264 that the loss of agricultural buildings within the Application Site would be contrary to criterion (e). I do not accept that there will be a loss of traditional farm buildings (criteria (e)) as this element is linked to CS (CD2.1) policy QE8 and as Mr MacQueen (CD6.3) confirms in his paragraph 8.7, the relevant buildings have been substantially altered. I consider that the Application proposals will not adversely affect the character of Appleton Thorn village (criteria (a)); local habitats and wildlife corridors (criteria (b)); local landscape features (criteria (c)) or farm buildings (criteria (e)). I do however accept that

there will be an impact on '*open landscapes*' (criteria (d)) as the scale of the proposed buildings will affect the local landscape character as Mr Taylor (CD6.2) indicates. I therefore accept some non-compliance with respect to preserving open landscapes (criteria (d)).

Policy AT-D3

4.46. Policy AT-D3 relates to flood risk, water management and surface water run-off. The policy is broadly consistent with CS policy QE4. I have concluded that the Application proposals comply with policy QE4 and the ORC at paragraph 10.120 agrees. I therefore conclude that the Application proposals also comply with policy AT-D3.

Policy AT-TH1

4.47. Policy AT-TH1 relates to traffic management and transport improvements and seeks contributions towards highways improvements, pedestrian priority schemes, and increasing public and community transport. I have considered the impact on highways and need for improvements at my MC8 and through the evidence of Mr Vogt (CD6.4). The ORC confirms that the Application proposals comply with AT-TH1 at paragraph 10.105. I agree with this conclusion.

Policy AT-TH2

4.48. Policy AT-TH2 supports sustainable transport measures. The policy is consistent with NPPF (21). I have considered the Application proposals against the requirements for sustainable transport measures at MC8 and through the evidence of Mr Vogt (CD6.4). The ORC confirms that the Application proposals comply with AT-TH2 at paragraphs 10.105 and 10.171. I agree with this conclusion.

Policy AT-E1

4.49. Policy AT-E1 supports proposals for the development of employment opportunities, and it seeks to give priority to the conversion of existing buildings '*where this option exists'*. I consider the need for more employment land and buildings at MC1; the lack of alternatives sites at MC2; the impact on residential amenity at MC12; and connectivity to the highway at MC8 and MC3. The ORC at paragraph 10.34 considered that the Application proposals are not in conflict with the requirement to give priority to conversion of existing buildings as this option does not exist for the type and scale of development proposed. I consider that there is no conflict with this policy.

4.50. I summarise my conclusions on compliance with the "*relevant*" ATNP policies below:

Relevant Policies in Neighbourhood Plan	**Proposed Development Compliance with Policy**	**Weight**
Policy AT-D1 Design of Development in Appleton Parish Thorn Ward	Partial non-compliance with criteria (e) and (i)	Full
Policy AT-D2 Protecting and enhancing local landscape character and views	Partial non-compliance with criteria (d).	Full
Policy AT-D3 Flood Risk, Water Management and Surface Water Run-Off	Fully Comply	Full
Policy AT-TH1 Traffic Management and Transport Improvements	Fully Comply	Full

Relevant Policies in Neighbourhood Plan	Proposed Development Compliance with Policy	Weight
Policy AT-TH2 Sustainable Transport Measures	Fully Comply	Full
Policy AT-E1New Local Employment Opportunities	Fully Comply	Full

Conclusion

4.51. I have already concluded in my paragraph 4.23 that the Application proposals accord with the '*most important*' Development Plan policies '*as a whole*'. I have also considered compliance with the other '*relevant*' policies of the Core Strategy and the Appleton Thorn Neighbourhood Plan (ATNP) and have concluded that the only non-compliance is in respect of certain aspects of policies QE7 and AT-D1 and AT-D2. This non-compliance is in relation to agricultural land and matters relating to landscape character and distinctiveness which I have confirmed in my paragraph 4.23 are localized in nature. The Application proposals support the general thrust of the policy requirements to deliver employment and they also benefit from "*very special circumstances*" to support their development within the Green Belt. In this regard I do not consider that this limited non-compliance on landscape and agricultural matters renders the Application proposals non-compliant with the Development Plan "*as a whole*", as the non-compliance areas are specific development management issues rather than being fundamental tenets of the Development Plan. 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, they benefit from support from NPPF (21) paragraph 11(c)

relating to approving development proposals that accord with the Development Plan without delay.

5. The Material Considerations

5.1. In this section of my Evidence, I assess and ascribe weight to the *'material considerations'* (*'MC'*) that I identify in Section 3 and I also consider whether any of them could outweigh this Section 38(6) presumption. I shall now address these in turn.

MC1 – The urgent need and demand for significant additional B8 land.

Policy context

5.2. As part of the Call-In decisions in 2021 (see my Appendix DR04), the Secretary of State confirmed "*that there is an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally*". I include a Policy Imperative Summary as Appendix DR03 which sets out the policy basis for the Secretary of State's conclusion. In my Appendix DR03 I consider national policy in respect of the NPPF (21) support for storage and distribution operations; the Levelling Up agenda; regional policy and Liverpool City Region imperatives relating to the economic contribution of logistics; and the Warrington policy context supported by the Economic Development Needs Assessment (EDNA 2021) (CD4.93). I demonstrate in that Appendix that this is still the case as a significant scale of unmet employment need (and specifically logistics need) still exists within the region, sub-region and locally. The ORC assessed this planning policy imperative in paragraphs 10.331 – 10.335 and concluded "*alongside this local support is the national support for schemes of this nature lent by the NPPF and it is clear that sites that are capable of accommodating larger units close to motorway junctions are vital to achieving the government's vision in this regard. It is therefore considered that the evidence available should be afforded significant weight*". I concur with this view and consider that the planning policy imperative remains both evident and

compelling and that it should be afforded **substantial** weight in favour of the Application proposal.

The Need

5.3. The evidence of Mr Kinghan on the need for employment land (CD6.9) supports Mr Pexton's (CD6.7) view that changes in the market have resulted in an increase in the need for warehouse space and that market demand indicates a strong market for logistics premises in Warrington, the M6 market and the wider North West. Mr Kinghan confirms that there are a number of reasons for this recent and anticipated continual demand for new B8 space including the ongoing growth in online retailing, parcel returns, and the need for new units that are more sustainable, are taller, with larger footprints and access to more power.

5.4. Mt Kinghan sets out the process to establish the scale of need for employment land. He notes that the '*Planning Practice Guidance*' seeks the use of a number of market and economic indicators in the production of economic needs assessment and that in his opinion these need to be considered jointly to come to evidenced judgements. In terms of future land need, the Warrington 2021 EDNA (CD4.93) recommends a long-term historic trend from 1996 which it projects forward to establish the scale of employment need during the emerging Local Plan period. He confirms that with appropriate adjustments this requires around 300 ha of future employment land, which the Submission Version of the Local Plan (CD3.1) provides for in new allocations which include the South East Warrington Employment Allocation (SEWEA) with includes the Application Site.

5.5. He reviews the approach used by BE Group in the EDNA (CD4.93) and concludes that it is generally sound but he confirms that it is lacking in certain aspects including omitting any examination of historic losses and reflections on

the implications of using such a long '*look back*' period which leads to an over emphasis on office development seen prior to 2012. He notes that the lack of analysis of historic losses fails to unpack the differences in land delivered and land lost, which has a bearing on jobs growth and change.

5.6. He utilises alternative trend based periods as well as a model based on lease deals (net change in space occupied) to test the 2021 EDNA's findings. He confirms that his assessment finds the EDNA recommendations should be adjusted to take account of an over emphasis on office type future needs, leading to a limited reduction of the forecast need to around 280 ha. He confirms that all the Submission Version Warrington Local Plan employment allocations including the South East Warrington Employment Area (and hence the Application Site) are required to meet this scale of need.

5.7. He reviews the evaluation of employment matters through the Examination in Public (EiP) of the draft Local Plan and the approach of the Local Plan Inspectors specifically in respect of how the forecast employment land need will impact on the economy in terms of jobs demand, and how this can be reconciled with the anticipated labour supply. He confirms that in his opinion, the way in which the Council responded to these matters at the EiP was wholly inadequate in that they simply projected forward the historic pattern of land take up from 1996 which included a significant offices component, and calculated the gross capacity of that theoretical land identified within the draft Local Plan, resulting in a jobs figure that vastly exceeds the labour supply being generated in Warrington by future housing growth.

5.8. His alternative approach is to use Government guidance on assessing the net additional economic impact of development to undertake a robust assessment of the actual net additional jobs expected to be generated by the Local Plan employment allocations. He then combines this with non-employment land-

based jobs to come to a justified range in expected jobs growth. He confirms that this range is well aligned to the labour supply associated with Warrington's future housing growth as established in the Housing Needs Assessment.

5.9. He therefore concludes that the draft employment allocations including the SEWEA (and hence the Application Site) are required and will not have adverse impacts on the Council's labour supply.

5.10. He further confirms that based on the evidence provided to the draft Local Plan Inspectors at the EiP, they were unable to reconcile the labour demand for land allocations against the labour supply balance and as a result they went on to establish their own mechanism for determining Warrington's employment land needs. This relied on the historic relationship between total jobs change in the economy and total employment land delivery – a relationship which he concludes is flawed and overly simplistic. He confirms that it lacks any analysis of the Council's actual need or expected future employment make up and it also falls short of PPG requirements to properly consider market signals and a wider range of evidence to justify the need.

5.11. He therefore concludes that when proper consideration is given to the relationship between the proposed employment allocations (including the Application Site) and labour demand, that the Local Plan Inspectors' concerns about excessive labour market pressure can be resolved in full. He confirms that the minimum future employment land requirement is 280 hectares and hence that there is a strong and compelling need for the Application proposals. I therefore consider that this is a significant positive material consideration and that it should be afforded **substantial** weight in favour of the Application proposals.

Current Market Demand

5.12. The evidence of Mr Pexton (CD6.7) on employment demand matters confirms in his paragraphs 14.1 – 14.2 that the Application Site lies in an established distribution location, and that as a result of Covid 19 and Brexit there has been a change in shopping habits in the retail sector which has resulted in the logistics/warehousing sector expanding its property footprint creating a need for an increased need for larger buildings. He confirms that occupiers, investors, and developers all require buildings to be built to a more sustainable quality and that specifications are being driven by automation/technology and sustainability of the built product both in construction and operation.

5.13. In his paragraph 14.5 he confirms that he has analysed the current supply of Grade A buildings in the North West and concluded that it comprises 325,823 sq. m in eighteen units which represents only 12 or 13 months' supply based on the five and ten year average take up respectively. He notes that take up for 2022 was 573,907 sq. m which was an exceptional level of take up, and double the ten-year average of 284,844 sq. m. He concludes that this confirms the imbalance between supply and demand. He notes that take up has historically been led by new speculative build units or buildings being built on a build to suit basis which account for c 80% of the market over the last eight years. This shows the need for more land to enable development.

5.14. Mr Pexton confirms in his paragraph 14.7 that the Warrington market area has 63% of the market take up when compared against the seven submarkets and hence the Warrington submarket is the most successful location. He confirms that there is a shortage of deliverable sites in the North West and there are no sites available within the Warrington Council area and that this is having an adverse effect on occupiers who are now in the situation where the available supply and pipeline are severely restricted. He predicts that

market failure will occur in the region as companies will have a limited choice of sites and locations which may not be suitable for their business needs and hence these companies will locate elsewhere either in or outside of the Borough or region.

5.15. Mr Pexton confirms that the current situation has been brought about by a number of factors which include – a step change in the market, local authorities not being able to bring sites through the employment allocation/ local plan process quickly enough in relation to (1) employment land take up, (2) the change in market requirements outpacing local plans and (3) a reliance on older employment sites which could never satisfy modern occupier requirements or are poorly located. He confirms that this is precisely the issue that Warrington BC are creating by relying on the former Fiddlers Ferry power station site to meet the needs of the future logistics occupiers. He notes that the Fiddlers Ferry site is approximately 5.5 miles from J7 of the M62 and it is 8.6 or 11.8 miles from the M6/M62 intersection, compared to the Application Site which is located adjacent to a motorway intersection. He confirms that the market for the Application Site is focussed on the wider Warrington market predominantly along the M62 (j8 - j11), M56 (j9 – j11) and M6 (j20 – j25) corridors and hence that the Application proposals can offer a deliverable Site with direct motorway access within this core area.

5.16. In terms of demand Mr Pexton confirms that there are currently 121 enquiries that will consider the Application Site within their search area. Some 800,000 sq. m of requirements are focused on the Greater Warrington area, 2,834,312 sq. m of sub regional /regional requirements will consider the market area which confirms the scale of demand for the Application Site.

5.17. Quantitatively and qualitatively Mr Pexton considers that there are no other development sites within the Warrington Council area other than the

Application Site that could meet the locational and spatial requirements now required by occupiers in this sector. These requirements are driven by a need for larger, taller distribution units to enable automation on larger regular shaped sites with good motorway access capable of accommodating large unit sizes. He also confirms that the Model Logic study (which he appends to his evidence) confirms that the Application Site has an overall ranking of being the best site against the comparisons for logistics use in the North West.

5.18. I support Mr Pexton's conclusions which confirm that the North West has an extremely limited supply of available buildings and land capable of delivering modern logistics facilities with good motorway access. More specifically Warrington does not have a deliverable land supply and has relied on '*the duty to cooperate*' with St. Helens Council to provide Omega West which is 73% built out. The Application Site is needed now to help to satisfy the Borough's need and I therefore consider that this is a significant positive material consideration and that it should be afforded **substantial** weight in favour of the Application proposals.

Conclusion

5.19. I consider there to be "*an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally*" which was recognised by the Secretary of State in 2021 and which is still the case. Mr Kinghan indicates that when proper consideration is given to the relationship between the proposed employment allocations (including the Application Site) and labour demand, that the Local Plan Inspectors' concerns about excessive labour market pressure can be resolved in full. He confirms that the future employment land requirement should be a minimum of 280 hectares and hence that there is a strong and compelling need for the Application proposals. I also consider that Mr Pexton sets out a compelling demand side justification

for new employment sites to meet this need; that the Application Site is the most suited to meet this need; and that market failure could occur if such sites are not available. In light of the above I therefore consider that policy imperative coupled with the urgent need and demand for significant additional B8 land is a significant material consideration in support of the Application proposals and that it should be afforded **substantial** weight in favour of the Application proposal.

MC2 – The lack of alternative sites to meet the urgent need and demand.

5.20. The ORC considered the issue of alternative sites to meet the urgent need and demand for employment in paragraphs 10.30 and 10.339 – 10.344. In paragraph 10.344 the ORC concluded that "*the applicant has demonstrated that there are no non-Green Belt sites to meet the need identified within Warrington*" and that "*it is considered that Fiddlers Ferry does not offer a realistic alternative to the application site because it is dependent on significant demolition and remediation taking place*". It further notes in respect of the Application proposals that "*the lack of alternative sites in Warrington lends further weight to the role this site would play in meeting Warrington's evidenced employment land needs*".

5.21. The Council's EDNA (CD4.93) and Submission Draft Local Plan (CD3.1) 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; that this land must be found from within the Green Belt; and that the Application Site is one of three preferred locations to meet the need for B8 development.

5.22. I include as Appendix DR05 an updated Alternative Sites Assessment ('*update ASA*') prepared by my Company to reflect the current situation. It concludes that the original ASA methodology remains robust and that the only new site

for consideration as part of the '*update ASA*' is Omega West (which lies in St Helens) and which has planning permission and is under construction. I understand three out of the four units being delivered on that site are expected to be occupied during 2023. As such there is very limited availability remaining at Omega West and the other Omega sites (Omega South and Omega South Zone 1B) have now been delivered and as such are no longer available. The only non-Green Belt site capable of accommodating large scale employment units is Fiddlers Ferry Power Station, however this requires new build residential development in the Green Belt to cross enable the delivery of the employment development on the previously developed site, due to the high costs of demolition and remediation of the former power station site. Furthermore, this site is more remote from the motorways to render it a less preferrable option for logistics developers and more likely to meet local needs.

5.23. The '*update ASA*' confirms that the Application Site (Six 56) performs best within the Council's EDNA (CD4.93) categorisation and the draft Local Plan Green Belt review (CD4.98 – CD4.100) confirms the Site is suitable to be released to meet the critical need for employment land in the area. The '*update ASA*' concludes that there are no sites that are suitable to accommodate the Application proposals in the short to medium term on land outside of the Green Belt within Warrington or within the current Warrington Green Belt. I therefore consider that the lack of immediately available alternative sites to meet the needs of logistics operators to be a significant material consideration in support of the Application proposals and that it should be afforded **substantial** weight in favour of the Application proposal.

MC3 – The locational advantages and deliverability.

5.24. Mr Pexton in his evidence (CD6.7) has set out the key locational characteristics that B8 warehouse and distribution occupiers require. He

includes within his Appendices a Logistics Report by Model Logic (March 2023) who explain the nature of the supply chain network, how network design is undertaken and how an Import Centre operates. Model Logic conclude that the Application Site (Six56) is located within a range of drive time zones (60 mins – 240 mins) which is large when compared to other locations and which they rank as "*number 1*" when compared to other local competitor sites and motorway junctions. They also confirm that the Application Site is located near the centre of the high population belt of Liverpool, Warrington and Manchester which contain a large population of potential customers. They consider that it is a prime site within which to locate an Import Centre linked to Liverpool2 docks and that when compared to other deep seaports, the Port of Liverpool is ranked as the "*number 1*" port for potential port-centric logistics. Finally, they consider that it is an excellent location to operate local or "*last-mile*" distribution (utilising sustainable electric vehicles); and given its location in relation to population centres, the Application Site has an excellent catchment area for recruiting staff and has an overall ranking of being the best site against the comparisons for logistics use in the North West.

5.25. I agree with the assessment by Model Logic and consider that the Application Site benefits from strategic locational advantages in relation to the North West market and hence that it will be highly attractive to the B8 warehouse and distribution occupiers. The suitability of the Application Site is confirmed in the Local Plan EDNA (August 2021) (CD4.93) which 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. I can confirm that the Application Site is available, suitable, achievable, and hence deliverable.

5.26. I also consider in line with the conclusions of Mr Vogt (CD6.4) and those of Amion (my Appendix DR06) as I set out in more detail in my MC4and MC5, the Applicants are committed to implementing a transport strategy that enables the workforce to gain sustainable and affordable access to employment, with a financial contribution to pump-prime and establish a new bus service that would provide a connection between the Application Site and surrounding areas where the workforce live, with a particular focus on the most deprived areas.

5.27. I consider that the locational advantages of the Application Site along with its suitability and deliverability are significant positive considerations in favour of it and that they should be afforded **substantial** weight in favour of the Application proposals.

MC4 – The economic benefits.

5.28. Chapter 6 of the NPPF (21) and policies PV3 and SN7 of the CS seek to ensure that economic growth and benefits are supported. I include as my Appendix DR06 a Socio-Economic Supporting Document by Amion Consulting which evaluates the socio-economic context for the Application proposals and their economic impact. The Socio-Economic Supporting Document evaluates the nature of the socio-economic baseline for Warrington in terms of employment, local labour market, unemployment and worklessness, capacity of social infrastructure and deprivation. I note from the Amion assessment that whilst Warrington has a growing economy, there continue to be pockets of severe deprivation within the Borough and areas of relatively high unemployment. The Application proposals will help to support the regeneration of these neighbourhoods, providing a range of accessible jobs.

5.29. Amion have undertaken a detailed economic impact assessment of the Application proposals. In terms of construction phase impacts, Amion set out the expected construction phase employment and GVA output effects in Table 3.1 below and confirm that "*the employment and GVA benefits have been assessed as a minor positive impact at the Warrington and wider impact area level*". Amion estimate that investment in the construction phase will potentially support in the order of 180 apprenticeship trainees over a 6.5-year construction period (an average of approximately 27 new trainees per annum).

Table 3.1: Construction phase employment and GVA

	Warrington	Cheshire and Warrington LEP
Gross temporary jobs (person years)		
- Direct	183	183
- Direct, indirect and induced	46	84
Net additional temporary jobs	73	93
Net additional GVA (£m)	£81.75	£83.55
Net additional GVA (£m per annum over construction period)	£12.58	£12.58

5.30. Amion also set out the expected employment and GVA impacts in the operational phase in Table 3.4 below.

Table 3.4: Operational phase employment and GVA			
	ES Chapter	**Reduced density80 sqm per FTE job**	**Reduced density and 15% automation adjustment**
Warrington Level			
Gross operational jobs (FTE)			
- Direct	4,113	3,599	3,129
- Direct, indirect and induced	5,306	4,643	4,037
Net additional jobs	1,326	1,161	1,009
Net additional GVA per annum (£m)	£149.0	£130.4	£130.4
Cheshire & Warrington LEP Level			
Gross operational jobs (FTE)			
- Direct	4,113	3,599	3,129
- Direct, indirect and induced	6,005	5,254	4,569
Net additional jobs	1,441	1,261	1,097
Net additional GVA per annum (£m)	£134.9	£118.0	£118.0

5.31. This table reflects Amion's consideration of the potential impact of reduced employment density in terms of job numbers, but Amion confirm that the net economic output effects are all expected to be of a "*substantial positive magnitude*". They also undertake further sensitivity assessments in relation to employment density and displacement and confirm that under these sensitivity scenarios, the net additional employment impacts remain of a "*substantial positive magnitude*".

5.32. Amion also anticipate that other positive impacts are expected to arise from:

- Increased business rate revenue – estimated at £7.1 million per annum once fully developed, representing a substantial positive benefit.

- Training and apprenticeship opportunities – the potential to align operations with sector focused skills provision to ensure that local opportunities are maximised is considered an impact of minor positive magnitude.

- Labour market benefits – there will be significant opportunities for local residents to benefit from new employment with roles from the highly skilled to more basic opportunities. The Applicants are committed to implementing a transport strategy that enables the workforce to gain sustainable and affordable access to employment, with a financial contribution to pump-prime and establish a new bus service that would provide a connection between the Application Site and surrounding areas where the workforce live, with a particular focus on the most deprived areas.

5.33. I have considered Amion's conclusions, and I concur with them. The ORC assesses the socio-economic benefits in paragraphs 10.172 – 10.198 and concluded *"that the proposed development would have a significant positive impact and would accord with the above policies*". I agree and consider that the Application proposals will deliver significant economic benefits which are needed in Warrington. I therefore consider that this is a significant positive material consideration and that it should be afforded **substantial** weight in favour of the Application proposals.

MC5 – The social benefits.

5.34. The Amion Socio-Economic Supporting Document (Appendix DR06) also assesses the labour market effects of the Application proposals. Amion have assessed the types of jobs that will be created by the Application proposals against the nature of the current local labour market and those who are currently unemployed. Amion confirm that 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. They assess the local labour market profile and confirm that based on published data for occupations sought by claimants of Jobseeker's Allowance (February 2023), around 55% of claimants at the UK level seek elementary occupations. On this basis, they confirm that it is reasonable to assume that employment opportunities and labour market impacts would be significant for these groups. They go on to undertake a spatial analysis of employment effects within the local (Warrington) labour market, having regard to the level of available capacity (claimant count) alongside an analysis of existing employment trends at the local level. They confirm that more than 50% of Warrington residents claiming out-of-work benefits currently reside in five wards: Bewsey and Whitecross; Fairfield and Howley; Orford; Poplars and Hulme and Latchford East. Based on February 2023 data, they confirm that there were 1,800 residents claiming out-of-work benefits in these wards. They estimate that around 50% of the local labour requirement could be met by workers residing in these areas. They also note that based on data from the 2021 Census, there are high levels of household deprivation within the identified wards. In each area, more than 50% of households demonstrated at least one characteristic of household deprivation and the highest average number of characteristics of all wards within Warrington. They therefore confirm that this suggests that the labour market impacts of the Application proposals are likely to be most pronounced within areas experiencing relatively high levels of deprivation.

5.35. I consider that this is a very strong correlation between the skills and educational profile of the unemployed within Warrington with the opportunities afforded through the B8 warehousing sector. In order to maximise these opportunities for local people, the Applicant is fully committed through a '*Local Employment Agreement*' condition to support partnership working and skills and training with local organisations such as Warrington & Co to help to ensure that the uptake of employment by economically inactive residents can be optimised. Amion have set out how this can be achieved through Local Employment, Training and Supply Chain Opportunities. I consider that these initiatives will positively benefit the local communities and those in greatest need of new work opportunities.

5.36. In addition to the above, technological change is driving a requirement for more complex work roles and a greater need for specialized technical skills. There is 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. The growing demand for higher level and a broader range of skills within the logistics sector now 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. This demonstrates that the jobs within the B8 warehousing sector not only align with the skills and educational profile of Warrington but also allow for progression within the sector to achieve higher than average salaries.

5.37. The Application proposals will also deliver additional health and recreational benefits through enhancements to footpaths and the incorporation of a new walking route through the wildflower meadow, encompassing the scheduled monument and enhancements to public transport provision as set out in Mr

Vogt's evidence (CD6.4). I consider that the Application proposals will provide significant positive socio-economic benefits and significant jobs and skills opportunities in Warrington as well as the wider area. These opportunities correlate well with the existing skills and educational attainments of the local population and hence I consider that the social benefits in favour of the Application proposal are significant and should be afforded **substantial** weight in favour of the Application proposals.

MC6 – The visual impact and effects on landscape character.

5.38. Chapter 15 of the NPPF (21), policies CC2, QE3 and QE7 of the CS and policies AT-D1 and AT-D2 of the ATNP address matters of visual and landscape impact. The ORC considers compliance with visual and landscape matters in paragraphs 10.121 – 10.148. Paragraph 10.147 indicates that the Council consider that there will be no conflict with CS policy QE3 but that they do not comply with CS policy CC2 criterion 2 and policy QE7 criterion 6; and ATNP policy AT-D1 criterion i) and policy AT-D2 criterion d).

5.39. Mr Carl Taylor has provided landscape and visual impact evidence (CD 6.2) which sets out his analysis and assessment approach in more detail. He confirms in paragraph 9.51 that whilst the Application proposals do create some harm to the '*openness*' of the Green Belt (which I address in Section 6 of my Evidence), this is limited to within 1km from the centre of the Application Site and corresponds broadly with a zone of influence that is assessed as experiencing significant visual effects (within the ES).

5.40. Mr Taylor notes in paragraph 9.53 that landscape effects are greatest for the landscape character area that holds the majority of the Application Site and that this will lead to a change to this landscape character area (LCA) and hence be a '*Moderate/Substantial*' adverse effect. He notes that whilst there will be

landscape effects over the other adjoining landscape character areas, particularly those that experience direct change through holding a portion of the Application Site within the boundaries of the LCA, that these effects are not assessed as significant ranging from '*Slight-Moderate*' adverse to '*Slight-Negligible'* adverse.

5.41. Mr Taylor confirms that the landscape effects over the Scheduled Ancient Monument (SAM) heritage asset at Bradley Hall are assessed as '*Moderate/Substantial*' adverse and reflect the large-scale change proposed immediately adjacent to and around this Site. He also notes beneficial aspects of the Application proposals through the retention and protection of the SAM and its setting with a 30m buffer zone of undeveloped land around this as well as a re-routed public path and landscape planting. Mr Taylor considers the mitigation measures which will reduce these visual impacts and screen the Application proposals including landscape bunds and woodland planting, however Mr Taylor accepts these measures are not expected to remove all views of the Application proposals from affected receptors. He further notes that the landscape and ecological mitigation is extensive and includes a designated mitigation area, new ponds, wildflower meadow and grassland, hedgerow and woodland and scrub planting. This is alongside the retention of large areas of existing woodland and some hedgerow and individual trees. Mr Taylor's assessment in paragraph 9.56 confirms that overall, the Application proposal can demonstrate a bio-diversity net gain which is a beneficial aspect which should be balanced alongside the adverse effects.

5.42. Mr Taylor considers that no scheme of this scale and nature could expect to come forward without creating some adverse effects over the receiving landscape and visual resource. It is my experience that almost any scheme of this scale and magnitude would have similar effects. The Application proposal is no different but, in his view, the effects are clearly constrained to a local

area of influence. He therefore concludes that the landscape affects will be '*moderate / substantial*' adverse at worst and the visual effects will be '*substantial*' adverse at worst but that these will improve over time. I therefore accept that this is a negative material consideration and that it should be afforded **moderate / substantial** weight against the Application proposals.

MC7 – The effect on ecology and bio-diversity.

5.43. Chapter 15 of the NPPF (21), policies CS1, QE3 and QE5 of the CS and policies AT-D2 and AT-TH1 of the ATNP address matters of ecology and bio-diversity. The ORC considers compliance with ecology and nature conservation matters in paragraphs 10.149 – 10.171 and confirms in paragraph 10.170 that "*subject to conditions and S106 obligation, it is considered that there would be no unacceptable impacts on ecology or bio-diversity interests and the application accords with the above policies*". Paragraph 10.169 confirms that the Application proposals should result in a net gain for habitats on site which "*will be weighed in the planning balance*".

5.44. Ms. Liz Seal has provided ecology and bio-diversity evidence (CD6.6) which sets out her analysis and assessment approach in more detail. She has concluded in her paragraph 7.1 that the Application proposals fully comply with CS policy QE5 and can deliver a proposed net gain of at least 10%, on Site which provides a degree of net biodiversity enhancement which goes beyond current policy and legislative requirements.

5.45. She notes in her paragraph 7.2 that Ecological Surveys have been carried out and updated in accordance with good industry practice and CIEEM recommendations and that the Environmental Statement has been updated to incorporate the results of updated surveys. She further notes that the Local Authority is content with the ecological evidence base and the EIA and that it

advised on the proposed habitat creation measures. Neither Natural England nor the Council's nature conservation advisers (GMEU) have objected to the Application proposal. Insofar as Great Crested Newts (GCN), bat or badger licences may be required for the Application proposals, she notes that there is no reason to believe that Natural England might refuse such licences as favourable conservation status can be secured.

5.46. In her paragraph 7.4, she notes that NPPF (21) requires net gain, and that Planning Practice Guidance encourages the use of the Defra metric to assess this. She has applied metric 4.0 to the Application proposals and she confirms that on-site measures can be delivered to secure the stated level of gain in terms of habitat areas. In addition to the net gain for habitat areas, she confirms that the Application proposals will deliver hedgerow and pond gains and positive woodland management on Site and will also include on-Site enhancements for bats and birds. Additional planning conditions have been agreed with the Council that would secure BNG provisions and provide for submission and approval of a site wide BNG Strategy; and an updated BNG assessment prior to commencement of each phase of development.

5.47. She also notes that a funded section 106 agreement to deliver habitat management for the benefit of farmland birds elsewhere in Warrington Council's area will compensate for the predicted residual impacts on breeding skylark and overwintering lapwing and starling. She confirms that this demonstrates full compliance with NPPF (21), specifically paragraphs 174 (d) and 180 (d).

5.48. The Outline Planning Permission granted by Cheshire East Council (Application No: 19/1685M) (CD4.154) also includes a planning condition requiring a CEMP associated with the ecological mitigation area which falls within the Cheshire East Authority boundary. This CEMP requires details for

safeguarding Bradley Brook, a habitat creation specification detailing the types of habitats to be created, a habitat creation method statement, an ecological monitoring strategy and a 30-year habitat management plan for all the retained, enhanced and newly created habitats for the Ecological Mitigation Area.

5.49. The SoCG (CD4.149) confirms in paragraphs 10.1 – 10.4 that Natural England had no objections subject to conditions and that the Application proposals are acceptable (subject to conditions). I agree with these conclusions and consider that the net gain in bio-diversity set out above is a positive material consideration and that it should be afforded **moderate** weight in favour of the Application proposals.

MC8 – The effect on traffic and transport.

5.50. Chapter 9 of the NPPF (21), policies CS2, CS4, MP1, MP3, MP4 and MP7 of the CS and policies AT-D1, AT-TH1, AT-TH2, and AT-E1 of the ATNP address matters of traffic and transport. The ORC considers compliance with traffic and transport matters in paragraphs 10.57 – 10.105 and confirms in paragraph 10.104 that "*the proposed scheme would include a package of improvement measures to the highway network, including the Primary Road Network at Cliff Lane….It is recognised that there would be no access to the site by rail or water but it is important to note that this is not a requirement of the policy and is not considered to be a reason to refuse the application*". Paragraph 10.105 confirms that the Application proposals accord with the above policies and the NPPF (21).

5.51. Mr. Alex Vogt has provided traffic and transport evidence (CD 6.4) which sets out his analysis and assessment approach in more detail. He has concluded in his paragraph 9.1.10 that detailed modelling has been undertaken of the Application proposals which demonstrates that there would be no '*severe*'

impact on the operation of the highway network, subject to appropriate mitigation. He has described the mitigation package within his evidence and confirms in his paragraph 9.1.11 that it is in the form of a comprehensive improvement scheme for the A50 Cliff Lane / B5356 Grappenhall Lane roundabout and the M6 J20 dumbbell roundabouts. He notes that this mitigation scheme is to be the subject of conditions and he concludes it is deliverable. He also assesses the accessibility of the Site and concludes in his paragraph 9.1.9 that the mitigation package to enhance pedestrian, cycle and bus accessibility will ensure that the Application Site can be made sustainable. He confirms in his section 6.4 that the financial contribution towards enhanced bus services (a bespoke bus service) will benefit not just employees of buildings at the Application Site but also serve other destinations at the Barley Castle Trading Estate. He therefore concludes that there would be no '*severe*' residual cumulative impact arising from the traffic associated with the Application proposal and therefore in line with the NPPF (21), it should not be refused on transport grounds.

5.52. The SoCG confirms in paragraphs 7.1 – 7.2 that Warrington Borough, as the Local Highway Authority and National Highways had no objections subject to conditions and a section 106 obligation and that "*subject to conditions and S106 obligation there would not be a severe impact on the highway network*". I agree with these conclusions and consider that the enhancement to the accessibility of locality (via the bus provision) will benefit existing employees / occupiers at the Barley Castle Trading Estate (as well as employees on the Application Site) and hence this is a positive material consideration and that it should be afforded **moderate** weight in favour of the Application proposals.

MC9 – The effect on heritage assets.

5.53. Chapter 16 of the NPPF (21), policies CS1 and QE8 of the CS and policies AT-D1, AT-D2 of the ATNP address heritage matters. The ORC considers compliance with heritage matters in paragraphs 10.235 – 10.264 and confirms in paragraph 10.258 that "*Historic England have advised that there would be less than substantial harm to the setting of the scheduled Bradley Hall moated site and that it is for the Council to weigh such harm against the public benefits. Historic England also advised that the proposed development would not have a significant impact on the settings of listed buildings outside the application site*". Paragraph 10.259 notes that "*the Cheshire Archaeology Planning Advisory Service (APAS) has advised that the proposed development is acceptable subject to the implementation of a programme of archaeological work in accordance with a written scheme of investigation*".

5.54. Mr. Jim MacQueen has provided heritage evidence (CD 6.3) which sets out his analysis and assessment approach in more detail. In his section 8 he accepts that the Application proposals will result in harm to the setting of a number of designated and non-designated heritage assets. He summarises the level of harm in his Table 8.1 and he confirms that the harm to designated assets will be no greater than '*less than substantial*', whilst to non-designated assets it will be no higher than '*major harm*'.

5.55. Mr MacQueen concludes that the Application proposals are consistent with the aims of policy QE8 of the Core Strategy in assessing and acknowledging the significance of designated and non-designated heritage assets within and adjoining the Site. He notes that the Application proposals incorporate mitigation measures, including landscaping, the provision of development buffers and landscape corridors, archaeological evaluation and recording

designed to mitigate potential development impacts. As such he concludes that no conflict with policy QE8 will arise, and this is acknowledged in the ORC.

5.56. The SoCG confirms in paragraphs 8.1 – 8.4 that Historic England had no objections subject to conditions and that "*there would be less than substantial harm to Bradley Hall moated site scheduled ancient monument, Tanyard Farm, Barleycastle Farmhouse, Booths Farm shippon and Booths Farm farmhouse*". I consider the Heritage balance in the context of paragraphs 202 and 203 of the NPPF (21) and compliance with heritage policies within Section 7 of my Evidence. I demonstrate that the '*public benefits*' outweigh the harm, but I accept that there will be harm (in the planning balance) to heritage assets and hence it should be afforded **limited / moderate** weight against the Application proposals.

MC10 – The effect on drainage and flood risk.

5.57. Chapter 14 of the NPPF (21), policies QE4 and 6 of the CS and policies AT-D1 and AT-D3 of the ATNP addresses matters of drainage and flood risk. The ORC considers compliance with these matters in paragraphs 10.106 – 10.120 and it confirms in paragraph 10.118 that "*the SUDs would improve water quality prior to discharge by removing pollutants and solids*" and that "*existing uncontrolled drainage would be removed where possible or incorporated into the proposed drainage system*". The SoCG confirms in paragraphs 11.1 – 11.3 that the statutory consultees (United Utilities, Council as Lead Local Flood Authority, and the Environment Agency) had no objections subject to conditions and that the Application is acceptable (subject to conditions) and accords with the relevant policies. I agree with these conclusions and consider that the improvements set out above to water quality are a positive material consideration which should be afforded **limited** weight in favour of the Application proposals.

MC11 – The effect on air quality.

5.58. Chapter 15 of the NPPF (21) and policies CS4 and QE6 of the CS address matters of air quality, odour, and dust. The ORC considers compliance with these matters in paragraphs 10.219 – 10.234 and it confirms in paragraph 10.234 that "*the proposed development would not have significant impacts in air quality terms and would not cause any exceedance in the national standards. It is therefore advised that the application is acceptable in these terms and there are no grounds for refusal of the application based on air quality, subject to condition…*". The SoCG confirms this in paragraphs 15.1 – 15.2 that this remains the case.

5.59. Mr John Drabble has provided Air Quality evidence (CD 6.5) which sets out his analysis and assessment approach in more detail. He confirms in his paragraph 1.4 that the Application proposals of themselves or in combination with other relevant developments will not result in any exceedances of the Government's health-based air quality Objectives and that air quality within designated AQMAs will not be significantly affected. In his paragraph 1.5, he confirms that there will be '*very limited*' harm to air quality and that the Application proposals will therefore comply with the relevant requirements of the NPPF (21), UK AQ Strategy Objectives, the air quality PPG and Core Strategy policies.

5.60. I therefore conclude that subject to the conditions, air quality impacts can be adequately mitigated but I also accept that impact upon air quality is a negative material consideration and that it should be afforded **very limited** weight against the Application proposals.

MC12 – The effect on residential amenity (noise and outlook).

5.61. Chapter 15 of the NPPF (21), policy QE6 of the CS and policy AT-E1 of the ATNP address matters of noise and vibration and the potential impact upon

residential amenity. The ORC considers compliance with noise and vibration matters in paragraphs 10.199 – 10.218 and confirms in paragraph 10.218 that "*in view of the advice from the Council's EP team and the recommended conditions it is considered that the impacts can be adequately mitigated such that they would not be unacceptable. The proposal accords with the above policies*". It addresses impact upon residential amenity in paragraphs 10.319 – 10.329 and confirms in paragraph 10.329 that *"although there would be an impact upon residential amenity due to the scale and nature of the proposed scheme, subject to conditions the proposal could be developed without such impact being unacceptable and as such the application accords with the relevant parts of the above policies"*. The SoCG confirms in paragraphs 14.1 – 14.2 that this remains the case.

5.62. An '*Updated Expert Noise Report*' has been prepared by Mr Fiumicelli (CD 6.1) which sets out his analysis and assessment approach in more detail. He concludes in his paragraph 5.49 that subject to the proposed conditions set out in the ORC and additional conditions that he sets out, there will be no significant adverse effects on the amenity of residents at the nearest residential properties. He further confirms in his paragraph 5.50 that the Application proposals will comply with the requirements of National and Core Strategy policies and guidance in relation to noise and will minimize adverse effects on health and quality of life and protect amenity. I consider that this is therefore a **neutral** consideration for the Application proposals.

MC13 – The effect on agricultural land.

5.63. Chapters 6 and 15 of the NPPF (21) and policy CC2 of the CS address matters of agricultural land. The ORC considers compliance with these matters in paragraphs 10.299 – 10.311 and it confirms in paragraph 10.311 that "*the proposed development would result in the loss of a large amount of agricultural land, and…. 24.65ha of BMV agricultural land cannot be replaced once lost…As the*

proposal does not relate to local enterprise and farm diversification and has a detrimental impact upon agricultural interests due to the amount of agricultural land that would be lost, the application does not accord with the relevant criteria of Policy CC2". The ES Part 2 – Agricultural Land & Soils Technical Paper 13 (CD4.14) assessed this matter in detail and confirmed that the Application proposals result in the loss of BMV and hence I accept that they do not fully accord with policy CC2. I have set out in my analysis of policy CC2 that it does not wholly reflect the approach within Section 6 ('*Supporting a prosperous rural economy*') of the NPPF (21) which does not seek to limit development to those that solely relate to '*local enterprise and farm diversification*'. I have also shown that 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. I therefore consider that bullet point 4 of policy CC2 is not consistent with the NPPF (21) and therefore limited weight should be attached to this part of the policy. I do however accept that there will be a loss of agricultural land (bullet point 5), some of which is BMV and hence that this is a negative material consideration and that it should be afforded **limited** weight against the Application proposals.

MC14 – The effect upon Climate Change and Energy.

5.64. Chapter 14 of the NPPF (21), policy QE1 of the CS and policy AT-D1 of the ATNP address matters of climate change and energy. The ORC considers compliance with climate change and energy matters in paragraphs 10.283 – 10.298 and confirms in paragraph 10.298 that "*subject to the proposed conditions, the application is considered acceptable and in compliance with the relevant parts of the above policies*".

5.65. My Company has produced a Climate Change and Energy Statement which I include as my Appendix DR07 which sets out our analysis and assessment in more detail. It addresses matters relating to the suitability of road-based logistics; the locational characteristics of the Application Site; environmental matters; energy efficiency; and Warrington Sustainability Appraisal (August 2021) (CD4.97). Within my Appendix DR07, we have shown that road-based logistics continue to be a key part of the future of transport of freight and that the Government's focus is upon the decarbonisation of transport and not precluding road-based freight. Further we show that the Application proposals incorporate a series of measures that would assist to minimise greenhouse gas emissions, including carbon dioxide and the impacts of climate change on the environment. These include the following:

- The sustainable location of the Site, close to a potential future workforce whilst also delivering a package of enhancement measures to encourage the use of sustainable modes of transport.
- The Site's location close to the strategic highway network.
- The excellent location to maximise the accessibility to a large customer catchment by electric delivery vehicles.
- Provision of EV charging points as part of the detailed design.
- Remediation of the Site and a cut and fill balance to create the development platforms at the construction stage by reusing material on-Site and thereby reducing waste.
- Provision of a Sustainable Urban Drainage Systems on Site with an allowance for climate change.

- A suite of ecological mitigation (on-Site and off-Site), such as new planting and the creation of ponds to compensate the loss of habitats on Site, equating to delivery of biodiversity net gain.
- Energy efficient measures and renewable and low carbon measures to be considered further at detailed design stage.
- Buildings built to BREEAM '*Excellent*' standard; and
- Warrington SA consideration which demonstrates the suitability of the Site as an employment allocation in the emerging Local Plan in respect of the impacts on climate change and energy.

5.66. I therefore conclude that subject to the conditions, climate change and energy matters have been fully considered and I agree with the conclusion of the ORC above. I consider that this is therefore a **neutral** consideration for the Application proposals.

MC15 – The other North West Called in cases.

5.67. My Appendix DR04 is a summary of the Secretary of State's decisions regarding the five Called-In cases for large scale employment schemes in the North West. I consider that the Secretary of State's conclusions are important because they were made in 2021 and related to similar schemes to the current Application proposals. Within these decisions, the Secretary of State concluded that there was an "*evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally*"; that employment land supply in the M6 corridor is "*critically low*"; that the evidence base underpinning the emerging Local Plans should be afforded "*significant weight*"; that the need for new employment land carried "*very significant weight*"; that the "*locational benefits carry further significant weight*"; and that the "*socio-economic benefits carry further significant weight*". The Secretary of State granted

planning permission for four of the five Call-In schemes as he concluded that "*very special circumstances*" exist. I consider that consistency in decision making is important to the operation of the planning system and hence I consider that the conclusions of the Secretary of State are highly material to the current Application proposals and that they should weigh heavily in favour of granting planning permission for the Application proposals. I have already concluded within MC1 that substantial weight should be afforded to the planning policy considerations which include the Secretary of State's conclusions within these Call-In cases.

MC16 – The emerging Local Plan.

5.68. As I have set out in MC1, MC2 and MC3 I consider that "*significant*" weight should be attached to the evidence base documents that support the Submission Draft Local Plan. I consider that the EDNA (2021) (CD4.93) and the Green Belt Assessments (CD4.98 – CD4.100) are objective assessments undertaken by experienced consultants on behalf of the Council and which draw robust evidence-based conclusions. I consider that whilst the Submission Draft Local Plan itself is a "*material consideration*" relevant to the Application proposals, the weight to be attached to it should be '*limited*' as it is the subject of '*duly made*' objections which have been heard at the Examination in Public and which remain unresolved until the consequential Main Modifications consultation has finished and the Local Plan Inspectors' final report is received. I therefore attach "*limited*" weight to the Submission Draft Local Plan (CD3.1) itself.

5.69. The Local Plan Inspectors issued an Interim Letter dated 16th December 2022 (CD3.2) in which they concluded that the submitted Local Plan is not '*sound*' as it stands. They noted however that it can be made '*sound*' by Main Modifications and that subject to consultation on such Main Modifications they

can proceed with their main report. As Mr Kinghan of Iceni Projects has set out in his evidence (and I have summarised in my MC1), the Interim conclusions of the Local Plan Inspectors on employment land matters are based upon misconceptions and hence he considers that they are "*flawed and overly simplistic*". The Applicant is submitting detailed objections to the relevant Main Modifications on employment land and in relation to the South East Warrington Employment Area (which includes the Application Site) and the Applicant is requesting that the Main Modifications be subject to an Examination in Public session to consider these objections. I therefore consider that as the Inspectors letter (CD3.2) is their interim position only and not their final position and that as consultation on the Main Modifications is underway (at the time of completing this evidence) then definitive conclusions cannot be reached on the matter. In light of this I consider that only very "*limited* weight" can be applied to the Local Plan Inspectors Interim letter (CD3.2) in respect of the Application proposals at this time.

5.70. The evidence base that supports the Submission Draft Local Plan (CD3.1) demonstrated that *"exceptional circumstances"* do exist in Warrington to release land from the Green Belt to meet employment needs and that the Application Site was the only A+ site identified in the EDNA (CD4.93) to meet this need. The ORC confirmed this in paragraphs 10.23 – 10.34 and I have also confirmed it in my MCs 1, 2 and 3. I will also show in Section 6 of my Evidence that *"very special circumstances"* exist in this case to support the Application proposals and hence I consider that it is inevitable that some Green Belt land is required to be developed to meet the scale and nature of employment need in Warrington and that the Application Site is the most appropriate Site to meet that need.

5.71. The tests for prematurity are set out in paragraphs 49 and 50 of NPPF (21). Paragraph 49 indicates that an application is unlikely to be considered

premature to justify a reason refusal unless both the development is so substantial such that it would undermine the plan-making process by predetermining decisions about scale, location or phasing of new development that is central to an emerging local plan; and the emerging local plan is at an advance stage. I consider that whilst the draft Local Plan is at an advanced stage, and the Application proposals are central to this Plan, they do not predetermine decisions about scale, location and phasing but rather are entirely in accord with the draft Local Plan's approach to employment scale, location, and phasing. Rather than predetermining these decisions, the Application proposals deliver the draft Local Plan's own employment strategy. I therefore do not consider that the two tests are met and hence the Application proposals are not premature.

5.72. Practically if it is concluded that I am wrong in my conclusion then I consider that the Application proposals could be in front of the Secretary of State for his consideration (following the Call In Inquiry and Inspector's report) in Autumn 2023 by which time the draft Local Plan Inspectors will have received all responses to the Main Modifications consultation and formed a judgement on these matters (as set out in paragraph 5.13 of the Council's Statement of Case) (CD4.152). The Secretary of State will therefore be able to make a decision on the Application proposals alongside the outcome of the Local Plan Inspectors final report. As I attach '*limited*' weight to the draft Local Plan (which allocates the Application Site for employment development and hence would be in favour of the Application proposals); and I also attach very '*limited*' weight to the Local Plan Inspectors Interim conclusions (which propose the removal of the draft employment allocation) then I consider that this matter is '***neutral***' in the consideration of the Application proposals. I do however consider that the need and demand for new employment land confirmed by Mr Kinghan and Mr Pexton along with the employment evidence base which supports the

emerging Local Plan should be afforded '*significant*' weight in favour of the Application proposals as I set out in MC1.

MC17 – The position of the Councils and Third parties.

5.73. Warrington Borough Council Planning Committee supported the recommendation in the ORC to approve the Application subject to conditions, the completion of the section 106 agreement and the Secretary of State not wishing to intervene. I understand from the Council's Statement of Case (SoC) (CD4.152) that considering the Local Plan Inspectors' Interim letter dated 16th December 2022 (CD3.2) they have now taken a "*neutral*" stance in that they "*will not be producing evidence either in support of or in opposition to the proposed development at the public inquiry*" (para 6.3 of the SoC). The Council have completed a SoCG with the Applicant (CD4.149) which addresses factual matters. In light of this, I therefore ascribe "***neutral***" weight to the position of Warrington MBC.

Position of Cheshire East

5.74. The Applicant submitted a duplicate Application to Cheshire East Council as whilst the majority of the Application Site lies within Warrington, a small proportion (5.93 ha) in the southeast corner of the Application Site lies within Cheshire East. This relates to an area proposed for ecological mitigation. Cheshire East resolved to grant planning permission for the duplicate Application subject to referral to the Secretary of State. This demonstrates that Cheshire East Council were content with all facets of the application including traffic, landscape and visual impact as well as the ecological mitigation. On 16th May 2022 the Secretary of State advised (CD4.153) that he was content that both Applications should be determined by the Local Planning Authorities and that they would not be called in. Consequently, Cheshire East

Council granted planning permission for the duplicate Application on 19th May 2022 and that planning permission remains extant (CD4.154). As this permission is extant and hence shows the acceptability of the application to the Cheshire East Council, I consider it to be a positive material consideration to which I ascribe "***moderate***" weight in favour of the Application proposals.

Position of Third Parties

5.75. I have also had regard to whether any issues raised by Third Parties are '*material considerations*' that I have not addressed thus far in my Evidence. I am not aware of any statutory consultee who has an outstanding objection to the Appeal proposals. I am aware that objections have been submitted to the Call-In Inquiry, but most of the matters raised by the Rule 6 Party and Interested Parties are already addressed in my Evidence and that of other witnesses. These Third Party concerns relate to the need for the Appeal proposals and availability of other sites to meet the need; the extent of economic and social benefits; the impact upon landscape, ecology, traffic/ highways, heritage, drainage, air quality, residential amenity, agricultural land, climate change and Green Belt; and whether the Appeal proposals conflicts with the Development Plan and the NPPF (21).

5.76. The only matter raised by Third Party objectors that is not covered within my Evidence relates to a non-planning consideration i.e., the relationship between the Applicant and the Council who have a completely separate partnership (Wire Regeneration). The ORC addresses this concern in paragraph 10.370 and confirms that this partnership relates to the Southern Gateway of Warrington which is a separate site. I do not accept this is a valid concern in respect of the Application proposals and my conclusion is reinforced by the fact that the Secretary of State is the ultimate decision maker for this

Application. As a non-planning consideration, I therefore ascribe "***neutral***" weight to the position of Third Parties.

MC18 – Planning conditions and section 106 agreement.

5.77. The Application proposals were the subject of an Environmental Assessment (CD4.1) and detailed technical analysis and through detailed evaluation by the Council and its Consultees which resulted in a series of proposed conditions. I understand that the majority of the conditions are agreed between the Local Authority and the Applicant. I also understand that a limited number of additional conditions in relation to trees, ecology and noise are accepted by the Council in principle subject to confirmation from their consultees.

5.78. I understand that the Local Authority and the Applicant also agree that the matters for the section 106 agreement comprise:

Highways

1. Contribution to provide footway/cycleway infrastructure linking the site with Broad Lane and Barleycastle Lane. £400,000 (100% prior to first occupation)

2. Contribution to public transport service bespoke to needs of employees of final occupiers. £600,000 (50% (£300,000)) prior to commencement and 50% (£300,000 prior to occupation)

3. Contribution to operation of strategic Travel Plan covering entire site. £50,000. (100% prior to first occupation). To be applied to the annual monitoring of the Travel Plan for a period of five years from submission of the Travel Plan.

Cessation of use of residential property within the Site

4. No development, other than matters of highway detail shall commence until the use of Bradley Hall farmhouse and other curtilage buildings for residential purposes has ceased.

Ecology

5. Contribution of £232,096.48 applied to the Mersey Gateway Environmental Trust (MGET) for compensatory bird habitat at Upper Moss Side (or other alternative site agreed with the Council) comprising habitat creation/restoration on approximately 20ha, with a management and maintenance fee for 20 years by MGET. £116,048.24 (50%) prior to commencement of development and £116,048.24 (50%) prior to occupation.

6. Full details of the ecological mitigation area as shown on drawing number 16- 184 P111 Rev I (Green Infrastructure Parameters Plan), including timescales for implementation, to be submitted prior to commencement. Development of the area to be carried out in accordance with the approved details and timescales.

7. The submission of a Framework Landscape and Ecological Management Plan (LEMP) for those landscaped areas of the site defined on the Green Infrastructure Parameters Plan (drawing no. 16-184 P111 Rev I) to be submitted and approved prior to the commencement of the development.

i) Details of the legal and funding mechanism by which the long-term implementation of the plan, for a minimum of 30 years, will be secured by the developer with the management body responsible for its delivery.

j) Where the results from monitoring show that conservation aims and objectives of the LEMP are not being met, how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity and landscape objectives of the originally approved scheme.

Prior to the commencement of development on each phase or plot (as defined by the phasing plan required by condition 5), a LEMP for that phase or plot shall be submitted to and approved in writing by the Local Planning Authority. The content of such LEMPs shall be in accordance with the details set out in the Framework LEMP, or any revised details as prior approved in writing by the Local Planning Authority and include a timetable for their implementation and details of management, site maintenance and monitoring. The development of each phase or plot shall be carried out in accordance with the approved LEMP for that phase.

Employment

8. Submission of a Local Employment Scheme prior to commencement, to include:

a) Details of how the initial staff/employment opportunities at the development will be advertised and how liaison with the Council and other bodies will take place in relation to maximising the access of the local workforce to information about employment opportunities;

b) Details of how sustainable training opportunities will be provided for those recruited to fulfil staff/employment requirements including the provision of apprenticeships or an agreed alternative;

c) A procedure setting out criteria for employment, and for matching of candidates to the vacancies;

d) Measures to be taken to offer and provide college and/or work placement opportunities at the development to students within the locality;

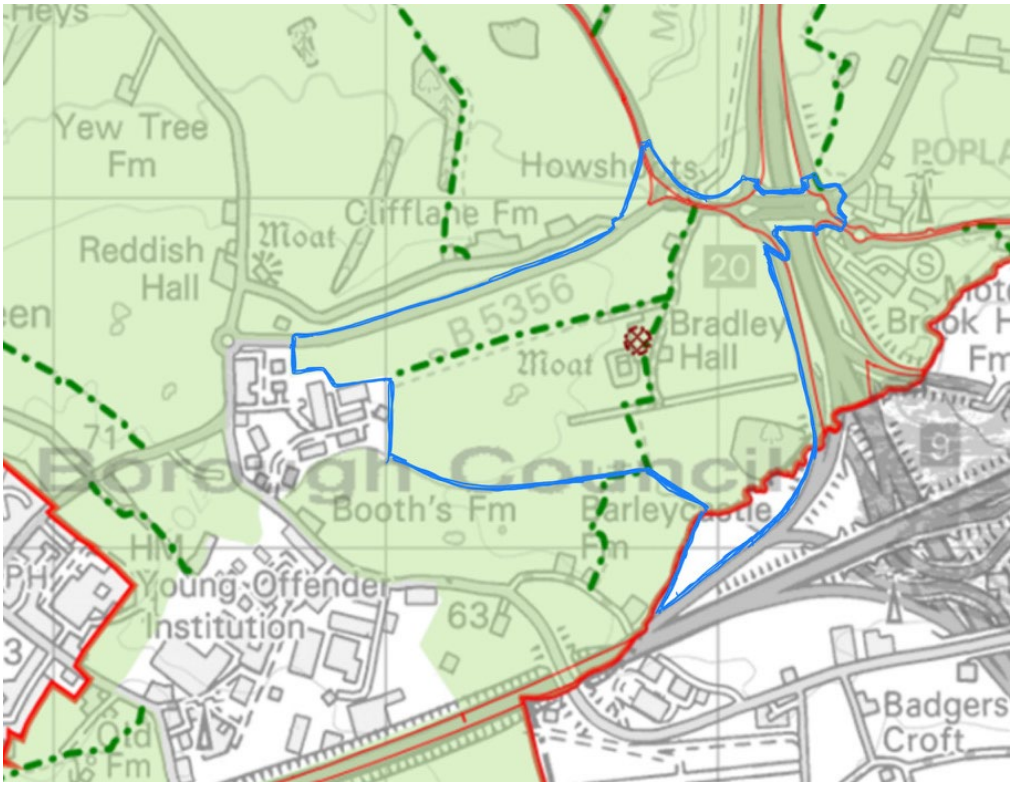
e) Details of the promotion of the Local Employment Scheme and liaison with contractors engaged in the construction of the development to ensure that they also apply the Local Employment Scheme so far as practicable having due regard to the need and availability for specialist skills and trades and the programme for constructing the development;

f) A procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the Local Planning Authority including details of the origins qualifications numbers and other details of candidates; and,

g) A timetable for the implementation of the Local Employment Scheme.

6. The Green Belt balancing assessment and "*very special circumstances*"

6.1. The Application Site is shown (edged blue) as Green Belt within the adopted CS Proposals Map (CD2.2) which is illustrated by the green wash on the extract below.



6.2. I set out in my Appendix DR09 a summary of the evolution of the Warrington Green Belt and how it was considered within the evidence base documents for the draft versions of the Warrington Local Plan. Within Appendix DR09, I show that the '*General Area*' of the Green Belt within which the Application Site sits was classified as making a "*weak*" contribution to Green Belt overall, one of only two '*General Areas*' to be categorised as such. It was proposed for release from the Green Belt and allocation for employment purposes in the Publication Draft Local Plan. Within a subsequent updated Green Belt

Assessment in 2021 (CD4.99), the Application Site was classified as making a "*moderate*" overall contribution to the Green Belt. The 2021 Assessment concluded 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 concluded that the Site is reasonably well contained and that removal of the draft allocation area from the Green Belt "*will not harm the overall function and integrity of the Warrington Green Belt*". Within this context, I set out below my own assessment.

6.3. 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'*. I accept that the Application proposals would represent "*inappropriate*" development in the Green Belt.

6.4. In line with paragraph 147 of the NPPF (21), I acknowledge 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*". I accept therefore that there is "*definitional harm*" to the Green Belt, and I now consider the Application proposals 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.

Green Belt "*openness*"

6.5. The NPPF (21) does not specify a precise definition of "*openness*", however, the Planning Practice Guidance has clarified the factors that can be considered, when assessing the potential impact of development on the '*openness'* of the Green Belt (paragraph 001 Reference ID: 64-001-20190722) 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."*

6.6. I am aware that in *R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3* (CD5.5) the Supreme Court held that visual quality of the landscape is not in itself an essential part of the *"openness"* for which the Green Belt is protected (paragraph 5) and that *"openness"* is the counterpart of urban sprawl (paragraph 22). The case of *Euro Garages Ltd v The Secretary of State for Communities and Local Government & ANOR [2018] EWHC 1753 (ADMIN) (11 July 2018)* (CD5.6) confirmed that when considering the impact of the development on the *"openness"* of the Green Belt, consideration must be given to the impact on the Green Belt not just on the Site itself (paragraph 21). Paragraph 29 confirmed that whether the *"openness"* of the

Green Belt is preserved, or conversely harmed, is not simply a question of whether something, which by definition has a spatial impact, is to be built. It will involve the question of whether the *"openness"* of the Green Belt is preserved and hence it will generally involve an assessment of the visual or perceived impact of the development. The impact of a development should therefore be judged on the wider Green Belt (not just the Site itself).

6.7. The Application Site itself is predominantly rural in character and consists of several medium-sized agricultural fields. The Site also contains Bradley Hall Farm which consists of a farmhouse and a series of outbuildings. Therefore, the Site is largely devoid of existing development. Nevertheless, in my view, 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 which is confirmed by Mr Taylor in his paragraph 7.6. In addition, he also confirms that the M56 and M6 motorways are strongly defining man-made features in this area, which also detract from the rural character of the area.

6.8. In "*spatial*" terms, the Application proposals would introduce large footplate and volume 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 proposals, but I accept that the introduction of these built elements will have a "*significant*" adverse impact upon the "*spatial*" aspect of "*openness*" of the Green Belt in this location. Mr Taylor agrees with my assessment in his paragraph 7.7.

6.9. In "*visual*" terms, Mr Taylor concludes (paragraph 7.9) that the visual effects are most pronounced within the Application Site boundaries and within 0.5km of the boundaries and that effects of '*Moderate/Substantial*' and above do not extend beyond 1km. He confirms that beyond 1km from the Application Site

centre the visual effects reduce to levels of '*Moderate*' through to '*negligible'* or '*none'* and this is true from locations to the south where the landscape is notably more enclosed, as well as from the north where views are to distance due to the elevated position over sloping topography. He confirms that "*For all the scale, massing and height of the proposed development, the actual area of visual influence is very local with only view locations in the immediate vicinity of this large site likely to experience significant effects. The Openness of the Green Belt will be harmed but this will be over a local area with the majority of the Green Belt remaining unaffected or else only experiencing visual change that is below Moderate adverse and typically between Slight and Negligible-None*".

6.10. As I have noted in Appendix DR09, the Warrington "*Green Belt Site Selection – Implications of Green Belt Release*" (August 2021) (CD4.99) document which supports the Draft Submission Local Plan confirmed 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.*" Despite this *"containment"* I accept that the Application proposals will have a "*significant*" adverse impact upon the "*visual*" aspect of "*openness*" of the local area of the Green Belt but that the majority of the Green Belt will be unaffected.

6.11. In terms of "*degree of activity*", I accept that as the operation of the Application proposals would be 24 hours per day and include significant vehicle movements, lighting, and activity then the *"degree of activity"* would be *"significant"*.

6.12. Notwithstanding the existing urbanising influences within close proximity to the Application Site and the degree of "*containment*" of the Site by existing landscape and man-made features which punctuate the Green Belt, I recognise that the Site forms part of a wider parcel of the Green Belt and therefore I

accept that the scale of the new buildings and structures will have an adverse impact upon the Green Belt *'openness'* due to their scale and height. I equate the nature of this impact to be "*significant harm*".

6.13. I have noted the analysis by Mr Taylor in section 1 of his evidence in relation to the other Called-In employment sites in the North West. He notes that the Secretary of State found that all of the considered developments would lead to an impact on '*openness*' that creates '*substantial*' weight and he confirms that "*I will be offering evidence to the Inspector in this appeal to demonstrate that this development proposal does create some harm to the openness of the Green Belt but that this is limited to within 1km from the centre of the proposal site and corresponds broadly with a zone of influence that is assessed as experiencing significant visual effects. I believe this is no greater a level of harm than that considered acceptable for the other approved logistics sites listed above*". I therefore consider that due to the level of containment confirmed by Mr Taylor, beyond the 1km area he refers to, there will be no impact whatsoever on the Green Belt's ability to perform its functions in relation to '*openness*' or '*purposes*'.

Green Belt "*purposes*"

6.14. As I have set out in Appendix DR09, the Local Plan Green Belt Assessments (2016 and 2021) (CD4.98 & CD4.99) concluded that the release of the Application Site from the Green Belt (as part of the wider draft employment allocation) would not represent unrestricted sprawl (*purpose* 1); would have no impact on preventing neighbouring towns from merging (*purpose* 2); would entail an incursion into undeveloped countryside (*purpose* 3); would not offend *purpose* 4; and would have a "*moderate*" impact on *purpose* 5 (which it notes would be the same for all Green Belt releases). It concluded that the draft employment allocation site is reasonably well contained and that removal of it from the Green Belt "*will not harm the overall function and integrity of the*

Warrington Green Belt". Within this context, I will now undertake my own assessment.

'*Check the unrestricted sprawl of large built-up areas'.*

6.15. The Application Site is not immediately adjacent to the Warrington urban area. The development of the Site will introduce new development of a significant scale that will extend the built form of the Trading Estate eastwards, but this would not represent the outward expansion of the Warrington urban area and a significant area of Green Belt between the Site and Warrington urban area would remain open and undeveloped. I therefore conclude that the Application proposals are not in conflict with this *'purpose'*. The updated Green Belt Assessment (Green Belt Site Selection – Implications of Green Belt Release" (August 2021) (CD4.99) confirms my conclusion, noting that "*whilst entailing growth of the Warrington urban area, development would not represent unrestricted sprawl*" and that "*as an urban extension it would be reasonably contained and well defined along strong permanent boundaries to the north, east and south (the M6, M56 and B5356)".*

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

6.16. This Application Site lies to the south of Warrington urban area and of Lymm (which is a settlement to the northeast, separated by the M6 motorway). The closest boundary of the Application Site is a significant distance from Grappenhall to the north (approx. 1.5 miles) and Lymm to the northeast (approx. 1.4 miles). The development of this Site would not result in the merging of Warrington with any other settlements as the large Green Belt swathe between the Application Site and Warrington urban area and these settlements will remain open. I consider therefore that the Application proposals would not have any adverse impact upon this Green Belt "*purpose*" and hence they are not in conflict with this '*purpose*'. The updated Green Belt

Assessment (Green Belt Site Selection – Implications of Green Belt Release" (August 2021) (CD4.99) confirms my conclusion, noting that "*development of this site would have no impact on preventing neighbouring towns from merging*".

'*Assist in safeguarding the countryside from encroachment*'.

6.17. As I have set out with regard to "*openness",* the Application Site is already affected by significant urbanised influences by virtue of the adjacent trading estate and motorways which could form durable boundaries, and which help to mitigate the extent of the encroachment, but I accept that the Application proposals will lead to encroachment into the countryside as the Application Site is principally undeveloped farmland. The Application proposals do therefore conflict with this '*purpose*'. The updated Green Belt Assessment (Green Belt Site Selection – Implications of Green Belt Release) (August 2021) (CD4.99) confirms that "*development of this site would entail an incursion into undeveloped countryside"* but it notes that the "*development would form an extension to the Appleton Thorn Trading Estate which is inset in the Green Belt".* It also confirms 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*". I agree with this conclusion and accept that due to the scale of the development proposed, the adverse impact upon this *"purpose"* is *"significant".*

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

6.18. The Application Site is not adjacent to the historic town of Warrington and does not cross any important viewpoint of the Warrington Parish Church and hence has no effect upon the setting and special character of historic towns. This position is confirmed in the updated Green Belt Assessment (Green Belt Site Selection – Implications of Green Belt Release) (August 2021) (CD4.99).

This parcel makes a negligible contribution to this '*purpose*', and therefore, I consider that the Application proposals do not conflict with this "*purpose*".

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

6.19. The Council's 2017 Green Belt Assessment (CD4.100) highlights that there is no single correct method for assessing this '*purpose*' and some other Local Authority assessments choose to screen this '*purpose*' from their assessments. Warrington's Green Belt Assessment has confirmed 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. My view from my assessments (MC1 and MC2) is that there is insufficient previously developed land to accommodate the future employment needs of the Borough, and as such, there are no sites within the urban areas of Warrington that could accommodate the Application proposals, and neither would it be desirable from an infrastructure and environmental standpoint for the Application proposal to be located within these areas. The '*Update Alternative Site Assessment*' (my Appendix DR05) confirms the lack of alternative sites to accommodate the Application proposal outside of the Green Belt. It also shows that only the Fiddlers Ferry site is previously developed in nature but that it will not be developed until the mid-2030s (at the earliest) and that it will not be prejudiced by the Application proposals as both are needed to meet the employment requirement and therefore, the Application proposals will not harm any urban regeneration initiatives and importantly will not prejudice the use of derelict and other urban land. Therefore, in my view, the Application proposals will have a neutral impact on this '*purpose*' and hence are not in conflict with it.

'*Very Special Circumstances'*

6.20. In line with the "*very special circumstances*" assessment set out in NPPF (21) paragraph 148, I have assessed the potential harm to the Green Belt and have concluded that the Application proposals are "*by definition, harmful to the Green Belt*" and hence "*substantial weight is given to any harm to the Green Belt*". I have also concluded that there will be "*significant*" harm to the "*openness*" of the Green Belt and "*significant*" harm to one "*purpose*", and no harm to the other four.

6.21. Within my assessment of '*Main Considerations*' (MCs), I have assessed whether there will be '*any other harm*' resulting from the Application proposals. I summarise my conclusions in a table below and note that in respect of the "*other harm"* associated with the Application proposal, the ORC in paragraph 10.366 concluded "*the landscape and visual impacts are considered to be significant and there would be a substantial loss of agricultural land, including BMV; however, the other impacts are considered to be more minor in nature".* This conclusion is very similar to my own and I categorise the other non-Green Belt harm as '*moderate*' overall, which could be reduced further at the detailed design stage.

Issue	**Positive or Negative**	**Weight**
Landscape / Visual impact (MC6)	Negative	Moderate / Substantial
Effect on Heritage (Ancient Monument and Listed Buildings) (MCs 9 and 18)	Negative	Limited / Moderate
Effect on Agricultural land (BMV) (MC13)	Negative	Limited
Effect on air quality (MC11)	Negative	Very limited

6.22. Also within my assessment of '*Material Considerations*' (MCs), I have assessed whether there will be any '*other considerations*' arising from the Application proposals that are beneficial in nature. I summarise my conclusions in the table below.

Issue	**Positive or Negative**	**Weight**
Policy support (MC1)	Positive	Significant
Need and demand for new employment land (MC1)	Positive	Significant
Lack of Alternative sites (MC2)	Positive	Significant
Locational advantages and deliverability of Site (MC3)	Positive	Significant
Economic benefits (MC4)	Positive	Significant
Social benefits (MC5)	Positive	Significant
Improvements to highway network (MC8)	Positive	Moderate
Environmental (ecology and drainage) benefits (MC7 and MC10)	Positive	Moderate / Limited
Planning permission within Cheshire East Council (MC17)	Positive	Moderate

6.23. I note that in respect of the "*other considerations*" associated with the Application proposals, the ORC in paragraph 10.366 summarised them as follows:

- "Evidence – significant weight
- Meeting an identified need – significant weight

- Absence of alternatives – moderate weight
- The deliverability of the application site – significant weight
- Socio-economic benefits – significant weight
- Long term ecological benefits – limited weight
- Traffic and transport benefits – limited weight"

6.24. The ORC conclusions are very similar to my own on these main matters.

6.25. In drawing together the "*very special circumstances*" assessment I acknowledge and accept that there is substantial "*definitional*" harm to the Green Belt and that the harm to the "*openness*" of the Green Belt is "*significant*", and that there is "*no harm*" to four of the "*purposes*" of the Green Belt and "*significant*" harm to one "*purpose*". I also consider that the "*other harm*" to be weighed in the assessment is "*limited*" to "*moderate / substantial*" in nature and of "*moderate"* weight in my overall assessment and that much of this harm can be reduced to '*limited*' at the detailed design stage.

6.26. In terms of the "*other considerations*" that need to be weighed against the Green Belt and "*other harm*", I have concluded that these "*other considerations*" relating to the need and demand for B8 warehouses and distribution and the lack of alternative sites to meet that need outside of the Green Belt are very significant and weighty considerations. Further I have concluded that the locational advantages of the Application Site and its genuine delivery credentials are also very significant and weighty considerations. These are reinforced by the economic benefits of job creation (construction and operation), expenditure and valued added which are also very significant and weighty considerations. The Application proposals also deliver socio-economic benefits to the people of Warrington which are also very significant

and weighty, and environmental benefits that are moderate positive considerations to be weighed in the assessment.

6.27. My summary table below sets out the positive considerations (with weighting) on the left and the negative considerations (with weighting) on the right.

Positive "*other considerations*"	**Weight**	**Negative "*harm*"**	**Weight**
Policy support	Significant	Green Belt "*Definitional*" harm	Significant
Urgent need and demand for additional B8 warehouses and distribution.	Significant	Green Belt "*openness*" and one "*purpose*"	Significant
Lack of alternatives to meet the urgent need and demand outside the Green Belt.	Significant	Landscape / Visual impact	Moderate / Substantial
Locational advantages and deliverability of the site.	Significant	Effect on Heritage (Ancient Monument and Listed Buildings)	Limited / Moderate
Economic benefits of job creation; construction expenditure; business rates; training schemes.	Significant	Effect on Agricultural land (BMV)	Limited
Social benefits of addressing deprivation; job schemes and partnerships; image / catalyst and blight; health and recreation; and public transport.	Significant	Effect on air quality	Very limited

Positive "*other considerations*"	**Weight**	**Negative "*harm*"**	**Weight**
Improvements to the Highway network	Moderate		
Environmental benefits of 10% Net Biodiversity Gain. Environmental benefits of remediation; flood risk and water quality.	Moderate / Limited		
Position of Cheshire East (planning permission granted)	Moderate		

6.28. In light of the above, I conclude that the "*substantial*" harm to Green Belt by reason of "*inappropriateness*" and the "*substantial*" harm to "*openness*" and to one "*purpose*" of the Green Belt, along with the "*other harm*" identified arising from the Application proposals would be "*clearly outweighed*" by the above "*other considerations*" (benefits) which demonstrates the existence of '*very special circumstances'*. I consider than in line with paragraph 148 of the NPPF (21), "*very special circumstances*" exist to support the Application proposals.

6.29. I therefore also consider that they comply with policies CS1, CS2 and CS5 of the Core Strategy for the same reasons. Paragraph 10.367 of the ORC agreed with this conclusion and confirmed that "*these other considerations are considered to be compelling and sufficient to clearly outweigh the harm caused to the Green Belt and the other harm resulting from the proposal. Very special circumstances are therefore considered to exist which justify the approval of this application and as a result, the proposal is considered to accord with Local Plan Policies CS1 and CS5 and the NPPF in this regard".*

7. The Heritage balance.

7.1. Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 states that when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses. Paragraph 10.358 of the ORC sets out the accepted levels of harm to designated and non-designated heritage assets which Mr MacQueen confirms in his evidence. I also accept that as a matter of principle, as set out in paragraph 199 of the NPPF (21), "*great weight*" should be given to the conservation of heritage assets.

7.2. In line with the requirements of paragraph 202 of the NPPF (21) the ORC balances this harm against the "*public benefits*" of the Application proposals in paragraphs 10.359 – 10.360 and concludes that "*the weight of benefits is considered to outweigh less than substantial harm to the designated heritage assets, in accordance with the NPPF and applying the statutory presumption in S66 of the LBCA*".

7.3. Paragraph 10.361 of the ORC applies the NPPF (21) paragraph 203 test for non-designated assets and concludes that the harm is outweighed by the public benefits of the Application proposals. In line with these conclusions, paragraph 10.362 of the ORC concludes that, subject to conditions, the Application proposals accord with policies CS1 and QE8 of the Core Strategy and ATNP policy AT-D1. It concludes that due to the demolition of the non-designated agricultural building at Bradley Hall Farm, the Application proposals do not accord with ATNP policy AT-D2 (e) but that "*it does however accord with NPPF with regard to heritage assets and it is considered that refusal of the proposed development would not be justified on the basis of harm to heritage assets*".

7.4. I agree with the conclusions that the *"public benefits"* tests for designated assets are passed as I consider that the "*material considerations"* that I have set out in Section 5 and summarised within my Green Belt consideration in Section 6 of my Evidence equate to the "*public benefits*" required within the context of paragraph 202 of the NPPF (21). In respect of non-designated assets, Mr MacQueen and I have undertaken the '*balanced judgement*' required by paragraph 203 of the NPPF (21) and we consider that the benefits of the Application proposals outweigh the heritage harm identified.

7.5. I agree with Mr MacQueen that the Application proposals comply with the relevant policies set out above. I do not accept that the Application proposals are not in accord with ATNP policy AT-D2 (e) as Mr MacQueen has confirmed that the Bradley Hall Farm building has been substantially altered and hence does not qualify as a "*substantially unaltered"* building as set out in CS policy QE8 which is referred to within ATNP policy AT-D2 (e).

8. Conclusions

8.1. As I have concluded that the Application proposals comply with the Development Plan "*as a whole*" and there are no other *'material considerations'* which weigh against the Application proposals, then I consider that there is a Section 38(6) presumption in their favour and they also benefit from support from the NPPF (21) paragraph 11(c) which confirms that planning decisions should apply a presumption in favour of '*sustainable development'* by "*approving development proposals that accord with an up-to-date development plan without delay*".

8.2. I consider that the Application proposals accord with the approach of the NPPF (21). In respect of Chapter 2, I consider that they comprise "*sustainable development*" as they satisfy the economic, social, and environmental objectives and the requirements of paragraph 11 of the NPPF (21). I have explained the economic, social, and environmental considerations earlier in my Evidence and from that I consider that the Application proposals fully satisfy the economic and social objectives of the NPPF (21). In relation to the environmental objective, whilst I accept that the Application proposals represent "*inappropriate*" development in the Green Belt and have an adverse impact on landscape character and loss of some Best and Most Versatile agricultural land, I consider that the benefits of ecology, bio-diversity, landscape / tree planting and flood / water quality mean that the Application proposals would satisfy the environmental objective of "*sustainable development*". In respect of Chapter 4 (Decision-making) I consider that the Application proposals accord with the Development Plan (paragraph 47) and are not premature (paragraphs 49 and 50). They fully accord with Chapter 6 (Building a strong, competitive economy) as I set out in my MC1; and they also accord with Chapter 13 (Protecting Green Belt land) as I set out in Section 6. I have also demonstrated that they accord with the other relevant chapters including addressing sustainable

transport (MC8); climate change and flooding (MC14 and MC10); the natural environment (MC6, MC7 and MC11); and the historic environment (MC9 and Section 7).

8.3. I therefore consider that the Application proposals should be granted planning permission in accord with Section 38(6) and NPPF (21) paragraph 11(c).

Alternative Planning Balance

8.4. If contrary to this position, the Secretary of State or Inspector decides that breaches of certain policies in the Development Plan mean that overall, the Application proposals are not in compliance with the Development Plan, then I consider that planning permission should still be granted because other "*material considerations*" outweigh such a breach. I consider that these *"material considerations"* are those that I set out in Section 5 of my Evidence, and I ascribe significant positive weight to them overall.

8.5. I am supported in my view by the ORC which whilst it concluded that the Application proposals were contrary to the Development Plan "*as a whole*", it confirmed in paragraph 12.2 that "*There are however compelling material considerations listed in paragraph 12.1 and support for the scheme in the NPPF, which are considered to outweigh the non-compliance with the development plan".* Paragraph 10.366 sumarised the Council's approach to these '*material considerations'* and paragraph 10.368 confirmed that "*the material considerations include the matters listed in paragraph 10.366, in addition to the support given to the proposal by paragraph 83 of the NPPF which, in the context of building a strong, competitive economy, states that planning decisions should recognise and address the specific locational requirements of different sectors, which includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations. These material considerations are compelling and sufficient to outweigh the scheme's non-compliance with the development plan".*

8.6. I consider that in this context, the "*planning balance*" is weighted significantly in favour of the Application proposals as the "*material considerations*" that I set out in Section 5 clearly outweigh any perceived policy and non-policy harm. I therefore consider that in line with paragraph 12 of the NPPF (21) there are very clear "*material considerations*" which would support departing from the Development Plan.

Secretary of State matters.

8.7. The Secretary of State has indicated that he wishes to be informed about the matters highlighted below for the purposes of his consideration of the Application proposals.

'Whether the proposal would be inappropriate development in the Green Belt having regard to the development plan and the National Planning Policy Framework (the Framework), including the effect on the openness of the Green Belt'.

8.8. I have fully addressed this matter in Section 6 of my Evidence.

'If the proposal is found to be inappropriate development, whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify the development'.

8.9. I have fully addressed this matter in Section 6 of my Evidence.

'Whether the proposal would preserve the setting and significance of a Scheduled Monument known as "Bradley Hall Moated Site"'.

8.10. I have fully addressed this matter in my MC9 and Section 7 of my Evidence.

'Whether the ES complies with Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 with

regard to cumulative impact, the ecological baseline and risks of major accidents or disasters'.

8.11. A letter was received from the Inspectorate dated 8th February 2023 (CD4.156) which raised three issues regarding the Applicant's Environmental Statement (ES). The Applicant responded in a letter dated 21st February 2023 to confirm that in respect of the first matter (cumulative development), the ES remains up to date. In respect of the second matter (ecological baseline information) the Applicant confirmed that work to update the ecological baseline is underway and in respect of the third matter (vulnerability to risks from major accidents/ disasters) the Applicant confirmed there are no relevant risk assessments to be taken account of. These letters are included in my Appendix DR08 which also includes a '*Further Information Statement*' which updates the situation with regard to cumulative matters and which confirms that the ecological conditions on Site remain unchanged since the earlier Phase I ecological surveys were undertaken and therefore, the environmental impacts, mitigation, residual effects, and conclusions reported in the ES Addendum Ecology and Nature Conservation Technical Paper all remain valid.

'The effect of the proposal on the safe and efficient operation of the highway network, local air quality and landscape character'.

8.12. I have fully addressed these matters in my MCs 8, 11 and 6.

'Whether the site is appropriate for development having regard to local and national planning policies that seek to manage the location of new development'.

8.13. I have fully addressed this matter in Section 4 of my Evidence especially regarding compliance with the policies which are *"most important"* to the consideration of the Application proposals.

8.14. I consider that I have fully addressed the issues raised by the Secretary of State within my evidence as set out above. I have set out in my Evidence the case for the Applicant regarding the Application proposals. I have assessed the key '*material considerations*' in my Evidence and I have concluded that the negative considerations are '*limited*' to '*moderate / substantial*' in nature and of '*moderate*' weight now and could reduce to '*limited*' at the detailed design stage, whilst the positive considerations are very '*significant*' and weighty.

8.15. I have concluded that the Application proposals comply with the Development Plan "*as a whole*" and hence there is a Section 38(6) presumption in their favour. I have concluded that the harm to Green Belt and other harm arising from the Application proposals would be "*clearly outweighed by other considerations*" and hence in line with paragraph 148 of the NPPF (21), I consider that "*very special circumstances*" have been shown in favour of the Application proposals.

8.16. In respect of heritage, I have concluded that there will be harm to heritage assets and '*great weight*' should be applied to this but that this harm is "*less than substantial*" and that the "*public benefits*" derived from the Application proposals outweighs this and hence that the requirements of paragraph 202 of the NPPF (21) are met. I have also demonstrated in respect of non-designated assets that in the '*balanced judgement*' required by paragraph 203 of the NPPF (21), the benefits of the Application proposals outweigh the heritage harm identified.

8.17. I have considered whether there are any other "*material considerations*" that may outweigh this Plan led presumption and concluded that this is not the case and hence the Section 38(6) presumption in favour of the Application proposals applies and they also benefit from support from NPPF (21) paragraph 11(c).

8.18. I have also assessed the situation if the Secretary of State / Planning Inspector does not agree with my conclusions regarding compliance with the Development Plan and I have concluded that "*other material considerations*" outweigh any non-compliance and that planning permission should still be granted for the Application proposals.

8.19. I therefore respectfully request that the Application proposals be supported by the Planning Inspector and Secretary of State and that planning permission be granted for them to allow their undoubted benefits to be realized.

9. Appendices

Proof Reference	Appendix
DR01	Summary Proof of Evidence
DR02	Summary of Consideration by Local Planning Authority.
DR03	Policy Imperative Statement
DR04	Summary of Secretary of State decisions on recent Employment sites in North West.
DR05	Employment Alternative Sites Assessment Update Statement
DR06	Amion Socio-Economic Benefits Update Report
DR07	Climate Change and Energy Statement
DR08	Environmental Assessment Compliance information (Environmental Statement Further Information Statement)
DR09	Local Green Belt Assessment Note

APPENDICES TO PROOF OF EVIDENCE

OF

DAVID ROLINSON

PLANNING MATTERS

Langtree Property Partners LLP

Called-In planning application for the Land to the west of Junction 20 of the M6 Motorway and Junction 9 of the M56 Motorway and south of Grappenhall Lane and Cliff Lane, Grappenhall, Warrington

LOCAL PLANNING AUTHORITY APPLICATION REFERENCE: 2019/34799

SECRETARY OF STATE'S REFERENCE: PCU/CONS/H4315/3244681
PLANNING INSPECTORATE'S REFERENCE: APP/M0655/V/22/3311877

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

Table of Contents

Proof Reference	Appendix
DR01	Summary Proof of Evidence
DR02	Summary of Consideration by Local Planning Authority.
DR03	Policy Imperative Statement
DR04	Summary of Secretary of State decisions on recent Employment sites in North West.
DR05	Employment Alternative Sites Assessment Update Statement
DR06	Amion Socio-Economic Benefits Update Report
DR07	Climate Change and Energy Statement
DR08	Environmental Assessment Compliance information (Environmental Statement Further Information Statement)
DR09	Local Green Belt Assessment Note

Appendix DR01 – Summary Proof of Evidence

SUMMARY PROOF OF EVIDENCE

OF

DAVID ROLINSON

PLANNING MATTERS

Langtree Property Partners LLP

Called-In planning application for the Land to the west of Junction 20 of the M6 Motorway and Junction 9 of the M56 Motorway and south of Grappenhall Lane and Cliff Lane, Grappenhall, Warrington

LOCAL PLANNING AUTHORITY APPLICATION REFERENCE: 2019/34799

SECRETARY OF STATE'S REFERENCE: PCU/CONS/H4315/3244681
PLANNING INSPECTORATE'S REFERENCE: APP/M0655/V/22/3311877

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

1. Summary

1.1. I am David Rolinson, and I am a Chartered Town Planner. I have worked on many employment and logistics schemes, as well as on various projects within Warrington. I am the lead Planning Consultant for the Application proposals.

1.2. The Application Site lies in the Green Belt in the '*adopted*' Warrington Core Strategy (2014) (CS) (CD2.1) and the '*made*' Appleton Thorn Ward Neighbourhood Plan (2017) (ATNP) (CD2.3). The relevant CS and ATNP policies are agreed in the SoCG (CD 4.149). I have concluded that whilst there is a need to assess compliance with individual '*relevant*' policies, 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*". I have set out which policies I consider should sit within the '*basket*' of '*most important*' policies and I have concluded that that the Application proposals accord with these policies '*as a whole*'. I have also considered compliance with the other '*relevant*' policies of the Core Strategy (CD2.1) and the Appleton Thorn Neighbourhood Plan (NP) (CD2.3) and have concluded that the only non-compliance is in respect of certain aspects of policies related to agricultural and landscape matters and that this does not render the Application proposals non-compliant with the Development Plan "*as a whole*". 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, they benefit from support from NPPF (21) paragraph 11(c) (CD1.1) relating to approving development proposals that accord with the Development Plan without delay.

1.3. I have set out the key '*material considerations*' that I consider are relevant to the Application proposals. I consider that the negative considerations relate to landscape, agriculture, heritage and air quality and that they are "*limited*" to

"*moderate / substantial*" in nature and of "*moderate"* weight in my overall assessment. I further consider that much of this harm could reduce to '*limited*' at detailed design stage and can be mitigated through conditions and the section 106 agreement.

1.4. The positive considerations relate to the need and demand for B8 warehouses and distribution and the lack of alternative sites to meet that need outside of the Green Belt; the locational advantages of the Application Site and its genuine delivery credentials; the socio-economic opportunities for the local community; the economic benefits of job creation (construction and operation), expenditure and valued added which are all very *'significant'* and weighty considerations. The Application proposals also delivers environmental benefits that are *'moderate'* positive considerations.

1.5. I have assessed the impact of the Application proposals on the Green Belt. I have concluded that there would be "*substantial*" harm to Green Belt by reason of "*inappropriateness*". I have also assessed the impact upon Green Belt "*openness*" and concluded that the harm would be "*substantial*" though the visual harm is '*localised*'. I have also assessed the potential harm to the Green Belt "*purposes*" and concluded that there is only harm to *"purpose c*" and not to any other Green Belt *"purposes*". I have shown that the draft Local Plan Green Belt Assessments (2016 and 2021) (CD4.98 and CD4.99) similarly concluded that there would be no harm to four of the *"purposes"* and that the draft Local Plan employment allocation site (which includes the Application Site) is reasonably well contained and that removal of it from the Green Belt "*will not harm the overall function and integrity of the Warrington Green Belt*".

1.6. I have weighed this Green Belt harm along with the "*other harm*" (non-Green Belt) and concluded that it would be "*clearly outweighed*" by the "*other considerations*" (benefits) which demonstrate the existence of '*very special*

circumstances' to support the Application proposals. I summarise this weighting in my table below.

Positive "*other considerations*"	**Weight**	**Negative "*harm*"**	**Weight**
Policy support	Significant	Green Belt "*Definitional*" harm	Significant
Urgent need and demand for additional B8 warehouses and distribution.	Significant	Green Belt "*openness*" and one "*purpose*"	Significant
Lack of alternatives to meet the urgent need and demand outside the Green Belt.	Significant	Landscape / Visual impact	Moderate / Substantial
Locational advantages and deliverability of the site.	Significant	Effect on Heritage (Ancient Monument and Listed Buildings)	Limited / Moderate
Economic benefits of job creation; construction expenditure; business rates; training schemes.	Significant	Effect on Agricultural land (BMV)	Limited
Social benefits of addressing deprivation; job schemes and partnerships; image / catalyst and blight; health and recreation; and public transport.	Significant	Effect on air quality	Very limited
Improvements to the Highway network	Moderate		

Positive "*other considerations*"	**Weight**	**Negative "*harm*"**	**Weight**
Environmental benefits of 10% Net Biodiversity Gain. Environmental benefits of remediation; flood risk and water quality.	Moderate / Limited		
Position of Cheshire East (planning permission granted)	Moderate		

1.7. I have undertaken a Heritage balance wherein I have concluded that whilst there will be harm to heritage assets and '*great weight*' should be applied to this, that this harm is "*less than substantial*" and that the "*public benefits*" derived from the Application proposals outweighs this "*less than substantial harm*" and hence that the requirements of paragraph 202 of the NPPF (21) (CD1.1) are met. I have also demonstrated in respect of non-designated assets that in the '*balanced judgement*' required by paragraph 203 of the NPPF (21 (CD1.1)), the benefits of the Application proposals outweigh the heritage harm identified.

1.8. I have therefore concluded that there are no other *"material considerations*" that outweigh the Section 38(6) presumption in favour of the Application proposals and hence they also benefit from support from NPPF (21) paragraph 11(c) (CD1.1). I have assessed whether the Application proposals accord with the approach of NPPF (21) and concluded that they do.

1.9. I have also assessed the situation if the Secretary of State / Planning Inspector does not agree with my conclusions regarding compliance with the Development Plan and I have concluded that other *"material considerations*"

outweigh any non-compliance and that planning permission should still be granted for the Application proposals.

1.10. I have considered the issues raised by the Secretary of State within my Evidence and consider that they are fully addressed within the Application proposals. I therefore respectfully request that the Application proposals be supported by the Planning Inspectors and Secretary of State and that planning permission be granted for them to allow their undoubted benefits to be realised.

Appendix DR02 – Summary of Consideration by the Local Planning Authority

Six 56 Chronology of Application

	Date	Event
1.	7th March 2017 6th December 2017 21st June 2018 30th July 2018 31st August 2018	Pre-application meetings.
2.	23rd February 2018	EIA Scoping Report submitted Warrington BC.
3.	6th April 2018	EIA Scoping Opinion issued by Warrington BC.
4.	15th October 2018 16th October 2018	1st Community Consultation workshops @ Grappenhall Community Centre.
5.	4th March 2018	Meeting held with 3 ward Councillors to discuss proposals in advance of 2nd consultation events.
6.	7th March 2018 2pm-7pm 8th March 2018 12pm-5.30pm	2nd Consultation events @ Grappenhall Community Centre and Golden Square Shopping Centre.
7.	15th May 2019	Outline Application with access (all other matters reserved) validated by Warrington BC.
8.	24th May 2019	Outline Application with access (all other matters reserved) validated by Cheshire East Council.
9.	9th May 2019	Planning Performance Agreement (PPA) signed.
10.	June 2019 – October 2019	Local Authority consultation on Application.
11.	12th September 2019	Curtins Consulting highway response to address comments raised by Warrington BC Highway Officer

	Date	Event
		consultee response dated 15th August 2019 and 30th August 2019.
12.	21st January 2020	Curtins Consulting highway response to address comments raised by National Highways response dated 20th December 2020.
13.	7th February 2020	Response to Warrington BC Conservation Officer consultee response addressing comments raised regarding re-use of Bradley Hall Farm and demolition of farm outbuildings.
14.	16th October 2020	Submission of further information including: -ES First Addendum -Updated Parameters Plan Document -BNG Summary (DEFRA Biodiversity Metric 2.0) -Whole Life-Cycle Carbon Assessment Updated Illustrative Masterplan Earthworks Cut and Fill Analysis Proposed Finish Levels Including Mounds Landscape General Arrangement Illustrative Sections Bund Sections to Show Noise Mitigation 01 Bund Sections to Show Noise Mitigation 02 Bund Sections to Show Noise Mitigation 03 Means of Access Plans – Eastern Site Access Western Site Access M6 J20 and Cliff Lane Mitigation Works Pedestrian Cycle Improvements.

	Date	Event
15.	October 2021 – November 2021	Local Authority consultation on ES First Addendum.
16.	17th November 2021	Submission of further information including: -ES Second Addendum Updated Parameters Plan Document Illustrative Sections Replacement Planning Statement (including appendices containing JLL update on employment need and demand and Model Logic Logistics Study Report).
17.	November 2021 – December 2021	Local Authority consultation on ES Second Addendum.
18.	27th February 2022	Submission of Cumulative Impact Assessment Note to Warrington BC.
19.	10th March 2022	Determination of Outline Planning Permission at Warrington BC Development Management Committee.
20.	April 2022	Application referred to Secretary of State.
21.	4th May 2022	Determination of Outline Planning Permission at Cheshire East Strategic Planning Board.
22.	16th May 2022	Secretary of State advised he was content that the Applications could be determined by the Local Planning Authorities.
23.	19th May 2022	Issue of Decision Notice by Cheshire East Council granting Outline Planning Permission.

	Date	Event
24.	26th May 2022	Secretary of State directed that the Local Planning Authority not to grant planning permission without specific authorisation.
25.	22nd November 2022	Letter from Ministry of Housing, Communities and Local Government confirming Secretary of State Call In to consider proposals at local inquiry.

Appendix DR03 – Policy Imperative Statement

Policy Imperative

The need for significant additional logistics land in the context of the policy approach and the extent and nature of the need for logistics development.

National Policy

1.1. This economic imperative is fully embedded in national planning policy through the National Planning Policy Framework 2021 (NPPF (21)) (CD1.1). The three overarching objectives of the planning system (paragraph 8) comprise balancing 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. 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. NPPF (21) further confirms that 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).

1.2. The planning system supports this national economic imperative, and it is fully appropriate for each region of the United Kingdom to identify and recognise its economic strengths and weaknesses and to plan positively to overcome these weaknesses in order to support growth, innovation and improve productivity.

Levelling up and The Northern Powerhouse

1.3. There is a national imperative to facilitate and deliver economic growth in the United Kingdom. This approach has been supported by all levels of Government, such as with the 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.

1.4. The Government published a long-term strategy called *"Industrial Strategy – Building a Britain Fit for the Future"* (November 2017) (CD4.104) which aims to create an economy that boosts productivity and earning power throughout the UK. Under that vision, there are five foundations:-

- Ideas – the world's most innovative economy;
- People – good jobs and earning power for all;
- Infrastructure – a major upgrade to the UK's infrastructure;
- Business environment – the best place to start and grow a business; and
- Places – prosperous communities across the UK.

1.5. The former Prime Minister, in his 30th June 2020 "*Build build build*" speech as Prime Minister, announced a "*New Deal*" which puts jobs and infrastructure at the centre of the Government's economic growth strategy.

1.6. The Government's '*The Build Back Better – Our Plan for Growth'* (2021) (CD4.102) comes after the pandemic and seeks to '*level up'* across the UK and "*unleash the potential*" of the whole country. It proposes to support business, deliver growth and create new jobs. In doing so it recognizes that "*economic*

growth is driven by increasing employment and productivity. The UK must return to growing employment and take action to address weak productivity in order to secure a sustainable increase in growth." There is a continued commitment to ensuring infrastructure investment delivers regional economic growth and in doing so, the Government confirmed its commitment to Freeports.

1.7. Liverpool is one of the eight Freeports in England which aim to create economic activity, investment and jobs. Goods imported to freeports are exempt from taxes paid to the UK Government. The benefits are expected to be wider than just for Liverpool City Region, also benefitting Warrington which lies on a key gateway to Liverpool. The Application Site (Six 56) is referenced by Invest Liverpool City Region (CD4.103) on their website in relation to the Liverpool Freeport, connected logistics and the expanding logistics landscape.

1.8. In 2021, the Department for Transport made a "*Written Ministerial Statement with the Department for Levelling Up, Housing and Communities*" (CD4.111). This made clear that in preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed by local planning authorities.

1.9. The White Paper *"Levelling Up the United Kingdom (2022)"* (CD4.112) sets out the Government's ambition to end the geographical inequality in the UK, beginning by improving economic dynamism and innovation to drive growth across the whole country. It is about realising and unlocking the potential of every place and spreading opportunity for business and individuals. Ongoing support is to be provided to existing partnerships, such as the Northern Powerhouse. It recognises e-Commerce as an existing specialism for the North West. Within this document, it is again recognised that the Freeports for the North West provide significant opportunities for the wider region.

1.10. The operational challenges of the COVID-19 pandemic, a transition to new challenges with Europe following Brexit, managing impacts of the Russia-Ukraine war and the global free-trade system have had implications for the economy and for the logistics industry. The Department for Transport's report, "*The Future of Freight, a long-term plan*" (2022) (CD4.113) has emerged in this context. It recognises the freight and logistics sector is a vital pillar of the UK economy, which enables "*UK prosperity, health, wellbeing and security by maintaining the smooth flow of goods into, out of and across the country.*" This states that *"the government is also keen to take opportunities to support wider strategic priorities that a successful freight and logistics sector will provide."*

1.11. In respect of the contribution the sector can make to the "*Levelling Up Agenda*", the report recognises that *"The freight and logistics sector is ideally placed to support levelling up. It is already a major contributor to economic activity, productivity, and employment across the whole of the UK and this contribution is growing."*

1.12. To ensure a strong freight and logistics sector supports wider strategic objectives, including "*Levelling Up*" the "*Future of Freight Plan*" (CD4.113) will "*ensure that the planning system provides appropriate support to enable logistics developers seeking to grow operations in all regions of the country to locate them where they need to be – near to the strategic road and rail network and close to an employment market."*

1.13. The plan (CD4.113) seeks to ensure that the planning system provides appropriate support to enable logistics developers seeking to grow operations in all regions of the country can locate them where they need to be – near to the strategic road and rail network and close to an employment market. Its recognises that planning has a crucial role to play with there being *"a clear role for the planning system in ensuring the country has a freight and logistics sector that*

is economically efficient, reliable, resilient, and environmentally sustainable and can meet current and future needs."

1.14. In setting a context for needing the planning system to support the Levelling Up agenda, the report states that *"Across 19 key industrial and logistics markets in England, demand for space was found to be above the supply of available land and floorspace in each area. With productivity in the sector expected to grow by 29% by 2039. The planning system will be key to enabling the growth and innovation of the freight sector to better meet current and future challenges. By ensuring the planning system can be more responsive to the needs of the sector, industry can be more engaged in planning, freight will be able to secure sufficient land of the right type in the right places and at the right time to support growth, innovation and improved productivity with the appropriate accompanying infrastructure."*

1.15. Transport for the North also have a strategy, "*Freight and Logistics Strategy*" (2022) (CD4.105), which identifies "*Levelling Up*" as crucial to the success of the UK. It recognises that the logistics sector has been growing at a slightly faster rate than in the wider economy and that the freight and logistics sector is a key part of the North of England's economy, providing a backbone for economic growth across a range of sectors. It also notes that "*The North has particular strengths in freight, logistics and warehousing. Reflecting its unique geography, the North is well served by seaports.*"

1.16. The Government is seeking to work in partnership with areas to develop long term *'local industrial strategies'* that will help to identify priorities to improve skills, increase innovation and enhance infrastructure and business growth. 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.

1.17. "*The Northern Powerhouse: One Agenda, One Economy, one North*" (2015) (CD4.106) recognises that logistics is a growth sector in the North and also looks to "*maximise the economic potential of the North*". Furthermore, "*Our Freight and Logistics Plan*" within the Strategy identifies the Northern Powerhouse being able to drive forward the freight and logistics industry and notes "*the rise of port-centric warehousing and the increasing portion of all freight traffic arriving in Northern ports means that the centre of gravity of the UK's freight and logistics industry is in the North*".

1.18. "*The Northern Powerhouse Strategy*" (2016) (CD4.110) sets out how the Government are seeking to achieve this through working with northern towns, counties, cities, LEPs, businesses and others to improve connectivity; address the disparity in skills between the North and the rest of the country; ensure that the North is an excellent place to start to grow a business; and promoting trade and investment across the North.

1.19. In 2020 Turley, on behalf of Tritax Symmetry, produced a report called '*The Economic Contribution of Logistics in the Northern Powerhouse*' (CD4.114) to demonstrate how further support for the logistics sector can assist in achieving aspirations for growth and *'levelling up of the regions'*. It confirms The British Property Federation (BPF) report findings in '*What Warehousing Where*' (2019) (CD4.115), that the North West currently contributes 31% of all warehouse properties and 32% of all warehouse floorspace in England, with the network of port, motorway, air and rail serving the industry. This shows that the logistics businesses tend to be slightly larger on average than elsewhere in the country, reflecting the geography of national and regional distribution networks.

1.20. Knight Frank's "*UK Logistics Market Outlook 2022*" (CD4.107) identifies a continued demand for last mile logistics and a continued rise in online sales

with further growth anticipated. All of these findings support the imperative for new logistics and warehouse sites.

1.21. '*Levelling Up – The Logic of Logistics*' by Savills on behalf of BPF (CD4.116) demonstrates the wider benefits of the industrial and logistics sector. This recognizes the UK planning system is restricting growth by not allocating sufficient land in the right locations for industrial and logistic uses. It suggests this "*has restricted ('suppressed') demand by 29% nationally*". It continues to confirm that 70% of industrial and logistic demand is generated in the North and the Midlands as opposed to 30% in the South. As such future jobs in these sectors could be important in bridging the GVA and productivity gap between the North and the South and enabling the sector to grow is essential in addressing the regional inequalities, a key aspiration of the Government.

1.22. It found that the UK planning system is restricting growth by not allocating enough land, despite the huge amount of growth in this sector in recent years, stating that "*If the industrial and logistics sector is to play its full part in levelling up, it is vital that we create a more agile planning system which is more responsive to the sector's needs.*"

1.23. Furthermore, The British Property Federation's (BPF) report "*Delivering the Goods in 2020 – The Economic Impact of the UK Logistics Sector*" (2020) (CD4.88) confirms that the logistics sector has gone from strength to strength and is "*an essential component of UK infrastructure.*" Its findings of 2020 showed the continued growth in the logistics sector, with 66% more logistics businesses since 2014, 56% growth in road freight businesses and land transport businesses by 76%. Its recommendations include ensuring the right quantity of space in the right place, in locations that match the market requirements and that where Green Belt reviews are required, the needs of logistics be considered.

1.24. This shows the importance of the logistics sector as well as its significant role in the "*Levelling Up Agenda*" and for the "*Northern Powerhouse*", thereby also assisting in addressing inequalities across the country, particularly in the North West. This demonstrates the imperative in the North West, where demand is high and growth can be achieved.

Atlantic Gateway

1.25. The Atlantic Gateway is a Partnership established in 2018 and provides a long-term vision for the areas within the North of England (Cheshire and Warrington, Greater Manchester and the Liverpool City Region) offering access to global markets and future opportunities for growth. "*The Atlantic Gateway Strategic Plan*" (2018) (CD4.108) confirms that the Atlantic Gateway has gained a global reputation for excellence in a number of sectors, including logistics, with this sector having potential to be even more successful and is one of the three priorities for accelerated growth in the Atlantic Gateway area. The priorities will strengthen and further economic potential across area. It has a "*vision to drive growth in the M62 and M56 corridors and boost the economic success of the North*".

Warrington context

1.26. In addition to the National imperative, there is also a significant regional and local imperative to facilitate and deliver logistics development. Warrington Council area lies between the Liverpool City Region and Greater Manchester.

1.27. The Cheshire and Warrington Local Enterprise Partnership (LEPs) is formed by Warrington, Cheshire East, Cheshire West and Chester Councils. The LEP produced a "*Delivery Plan 2022/23*" (CD4.109) with a vision for Cheshire and Warrington to be the most healthy, sustainable, inclusive and growing economy in the UK, and thereby making levelling up a reality.

1.28. The LEP's "*Strategic Economic Plan"* (SEP) (2018) (CD4.117) identifies a number of key sector strengths that will help provide the core to future growth within Cheshire and Warrington. This includes logistics and distribution as one of the strengths. With the area being recognised as being well positioned to take advantage of the ongoing major investments at the Port of Liverpool.

1.29. The LEP's "*Local Industrial Strategy*" (March 2019) (CD4.118) shows that the Cheshire and Warrington economy remains strong, but that there are potential challenges to be addressed in achieving the long-term economic objectives. The Local Industrial Strategy aims to deliver sustainable economic growth and in doing so, creating a more productive, resilient and inclusive economy.

1.30. Warrington's economic growth and regeneration programme is set out within "*Warrington Means Business*" (2020) (CD4.119). The Application Site (Six 56) is identified as one of the priorities for connected business locations, recognizing the location will be one of the best for new logistics and business in the UK with it straddling two key motorways and centrally located mid-way between Liverpool and Manchester conurbations.

1.31. The "*Warrington Economic Development Needs Assessment*" (EDNA 2021) (CD4.93), produced by BE Group confirms in terms of market findings that "*In response to the Covid-19 Pandemic and resulting national lockdowns, a greater part of the retail and wholesale market moved online. This growth in e-commerce has boosted an already strong logistics market and delivered record national take up for B8 uses in 2020."* It also notes the record year the UK logistics market saw in 2020, with lockdowns accelerating the shift to online and an increase in demand from ecommerce and Post and Parcel operators. Furthermore, it notes that, *"The North West reflects this high demand but lacks the supply to fully capitalise on this growth. This is reflected in Warrington where only 12.7 ha remains*

at Omega and that 12.7 ha will be taken up by 2022. Unsurprisingly, given this limited supply, stakeholders are clear that the Borough needs further land allocations."

1.32. It also highlights the role for Warrington in addressing the demand for logistics development that the Port of Liverpool provides, noting 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*".

1.33. The Council's evidence base (EDNA 2021); economic strategy (Warrington Means Business 2020); and planning policy approach (Submission Draft Local Plan) supports the policy imperative, showing 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.

1.34. The "*Warrington Local Plan Statement of Common Ground*" (Sept 2021) (CD4.155) addresses cross boundary working. It confirms the scale of employment need within the Submission Draft Warrington Local Plan (CD3.1) 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.

Liverpool City Region context

1.35. The Liverpool City Region (LCR) lies to the west of Warrington and comprises the Local Authorities of Halton, Knowsley, Liverpool, Sefton, St Helens, West Lancashire and Wirral.

1.36. The imperative for land for logistics and distribution is also supported by the "*Liverpool City Region Statement of Common Ground*" (October 2019) (CD4.120). The Statement of Common Ground is for 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."* 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".*

1.37. It is evident from both the Warrington Statements of Common Ground and the LCR's Statement 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. St Helens

has since gone on to adopt its Local Plan (July 2022) and within this has allocated Green Belt sites for employment development, including a large area of land at Parkside East and Parkside West and a further area at Omega West.

1.38. This demonstrates that here is an over-riding imperative to deliver new employment sites both within Warrington and the Liverpool City Region to meet the scale of demand that exists now in these locations.

1.39. All the Authorities in the LCR commissioned a Liverpool City Region "*Strategic Housing & Employment Land Market Assessment*" (SHELMA) (CD4.121) and the final report produced by GL Hearn, is dated March 2018. This document sets out the housing and functional economic market areas; assesses the Liverpool City Region's economy and property market; assesses the future economic growth potential; and sets out the need for both industrial land and specifically for large scale B8 warehousing development.

1.40. The aim of the SHELMA is *"to provide a consistent joint evidence base for housing and employment land needs over the period to 2037"* (paragraph 1.1) and *"particular consideration is given to the future strategic need for warehouse / distribution floorspace across the FEMA taking account of local demand drivers and the growth of the Port of Liverpool"* (paragraph 1.6). It also confirms that a separate *"Strategic Sites Assessment"* has been produced alongside the SHELMA which *"includes a review of sites capable of accommodating B8 warehouse / distribution units of over 9,290 sq.m together with candidate sites for future allocation"* and therefore it notes that this SHELMA should be read alongside *"up-to-date individual local authority employment land reviews"* (paragraph 1.7).

1.41. The Liverpool City Region (LCR) therefore produced an *"Assessment of the Supply of Large-Scale B8 Sites"* (June 2018) (CD4.122) and an *"Areas of Search Assessment"* dated August 2019 (CD4.123).

1.42. The SHELMA confirms in paragraph 3.25 that *"key sectors, particularly the warehouse / distribution sector operate across a wide geographic area. The 'area of search' for such uses is at a sub-regional or regional scale and relies on good links to the strategic transport network, good access to the labour force, and in the case of LCR good links to the Port of Liverpool"*. It further confirms that a key consideration in defining the FEMA and for policies for employment land is the potential growth of the Port of Liverpool and the SuperPort proposals and the need for additional warehouse and distribution floorspace to support this.

1.43. It also recognises there are broader economic inter-relationships with adjoining areas in particular with Warrington, and through into North Cheshire and North-East Wales. The need for B8 Warehousing has therefore been specifically addressed through the SHELMA process which shows that the supply of suitable sites has been low; and that demand is high and rising from Liverpool2 / SuperPort.

1.44. The conclusions of the SHELMA note that *"the market analysis undertaken points to a shortage of large sites capable of accommodating large-scale B8 development within the City Region. There is an evident need to identify additional land"*. Paragraph 12.4 confirms that for warehousing, new capacity will need new sites as *"many existing sites are poorly located in relation to the wider road network and residential areas or the plots cannot accommodate the larger warehouses that are usually required by the market"*.

Greater Manchester context

1.45. Similarly in Greater Manchester, there is a pressing need for more land for employment development. Nine Councils in Greater Manchester (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) have now submitted the "*Places for Everyone Plan*" (CD4.124) to the Secretary

of State for Levelling Up, Housing and Communities. This Plan emerges from the work originally undertaken for the Greater Manchester Spatial Framework (GMSF) in 2014.

1.46. The Plan recognises the increasing demand for logistics and warehousing and is becoming increasingly central to the economy and to everyday life. It also acknowledges that many of the logistic sites are reliant on road-based freight, taking advantage of strategic locations within the national highway network. In terms of employment land needs for Greater Manchester, the key evidence base documents include the '*Updated Note on Employment Land Needs in Greater Manchester*' (March 2021) (CD4.125). The assessment shows significant need for industrial and warehousing for the 16 year plan period. The "*Economic Forecasts for Great Manchester"* (February 2020) (CD4.126) identify a stronger jobs growth in some sectors, such as logistics. The *"Places for Everyone Employment Topic Paper*" (July 2021) (CD4.127) identifies a need to release selective Green Belt sites in key locations to help boost economic opportunities. These include sites on the M62 and M6 Motorway corridors to deliver economic activity and growth.

Recent Secretary of State Call In Decisions for Logistics developments

1.47. Appendix DR04 is a Summary of the recent Secretary of State decisions in the North West for large scale logistics development (through Call-In and S78 Appeals). These are as follows:

- Land at Junction 25 of the M6 Motorway in Wigan (allowed, June 2021) (Ref: APP/V4250/V/20/3253242 CD4.128)
- Land to West of Wingates Industrial Estate, in Bolton (allowed, June 2021) (Ref: APP/N4205/V/20/3253244 CD4.129)

- Land At Omega Zone 8, West Of Omega South And South Of The M62, St Helens (also known as Omega West) (allowed, November 2021) (Ref: APP/H4315/V/20/3265899 CD4.130)

- Former Parkside Colliery in Newton-le-Willows in St Helens (allowed, November 2021) (Ref: APP/H4315/V/20/3253194 CD4.131)

- Haydock Point, Land at A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens (dismissed, November 2021) (Ref: APP/H4315/W/20/3256871 CD4.132)

1.48. In the decision for the Land at Junction 25 of the M6 Motorway in Wigan, the Secretary of State endorsed the Inspectors conclusion on page 4 of his decision notice, which states "*that there is an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally*". He also agreed with "*the Inspectors' analysis of need for employment land*", along with their findings 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*". In footnote 86 of the decision "*sub-regionally*" is confirmed as "*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*".

1.49. The Inspectors further noted that "*demand for logistics floorspace is focused on the motorway corridors….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*" (paragraph 10.28).

1.50. For Land to West of Wingates Industrial Estate in Bolton, in the Secretary of State decision, he affirmed the Inspectors conclusion that the proposed development would contribute substantially to the national policy imperative, expressed in paragraphs 80 and 82 of the NPPF, to promote and support a

strong competitive economy, particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations.

1.51. For Omega West in St Helens, the Secretary of State reached the conclusion that it is clear from the evidence that "*there is a shortage in the supply of readily available sites to meet the needs of major logistics operators in the North West*".

1.52. In respect of the Former Parkside Colliery in Newton-le-Willows in St Helens, the Secretary of State concluded in paragraph 28 *"that there is clearly a pressing commercial need for new logistics floorspace at a local, Liverpool City Region 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".*

1.53. Whilst the Haydock Point proposals in St Helens were dismissed by the Secretary of State, in paragraph 35 he "*agreed that based upon the employment needs of St Helens Borough alone, there was no overriding need for the appeal site to provide employment. However, he further agrees that it is necessary to take into account that there exists an immediate, acute shortage of land for large-scale logistics employment in the sub regional Primary Market Area of St Helens, Wigan and Warrington, within the M6 corridor. He further resolved that this is particularly the case in regard to the need for storage and distribution facilities, at a variety of scales, including the largest scale, in accessible locations*". He gave "*significant weight*" in favour of this sub-regional need.

Conclusions

1.54. In light of the above, it is evident that the Secretary of State agreed in 2021 "*that there is an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally*". The above demonstrates that this is still the case as a significant scale of employment (and specifically logistics development) unmet need exists within Warrington, as well as within

the wider North West areas of the Liverpool City Region, and Greater Manchester.

1.55. It is clear that to accommodate this scale of need all of these bodies either have, or are proposing to release land from the Green Belt to meet it.

Appendix DR04 – Summary of Secretary of State Decisions on recent Employment sites in North West

1.1. During 2020/21, The Secretary of State for Housing, Communities and Local Government, in pursuance of Section 77 of the Town and Country Planning Act 1990, give direction requiring several planning applications for industrial and logistics development proposals, in Green Belt locations, within the North West of England to be referred to him, instead of being dealt with by local planning authorities.

1.2. In addition, the prospective developers of the Haydock Point scheme, (APP/H4315/W/20/3256871) (CD4.132) appealed against non-determination, so that their scheme could also be considered at the same time as the other schemes, by the Secretary of State.

1.3. These development proposals are set out below, along with a short summary of the key points raised by the Secretary of State and the Inspectors, with reference to each decision, along with a plan identifying the locations of these sites:-

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
1	APP/V4250/V/20/3253242 Land at Junction 25 of the M6 motorway, Wigan, bounded by the M6 slip road and A49 Warrington road junction to the east, agricultural land to the north and the M6 motorway to the west, Wigan.	Tritax Symmetry Ltd	Full planning permission for the erection of 27,871 square metres of employment floor space (Use Class B8 with ancillary integral Use Class B1a floor space), comprising two units and the provision of associated infrastructure including sub-station, car parking, landscaping, access from the A49 roundabout and internal estate road; and Outline planning permission for the erection of up to 106,095 square metres of employment floor space (Use Class B8 with ancillary integral	Green Belt in Wigan Local Plan Core Strategy 2013. The site was previously identified as part of a broad location for employment development during the preparation of the CS in 2011, which proposed to release 30ha from the Green Belt. This was considered via the Public Examination for the CS, with the examining Inspector	Approved 21 June 2021

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
			Use Class B1a floor space), including car parking, internal estate road and landscaping. All matters except for access are reserved, with access proposed from the A49 roundabout.	concluding that, in the absence of a developer-backed scheme and a lack of demonstrated need following the economic fallout of the 2009 financial crisis, there was no overriding imperative to release the site from the Green Belt. Emerging policy GMSF Publication Plan October 2020/28.	

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
				The site was identified as a key location for industrial/ warehousing and proposed to be released from the Green Belt and allocated for 'large-scale' employment use in accordance with GM Allocation 48, at the time of the decision.	
2	APP/N4205/V/20/3253244 Land to West of Wingates Industrial Estate, Wimberry	Harworth Group	Outline planning application [but with means of access in detail] for strategic employment development for industrial (Class B1c/B2), storage and distribution (Class B8) and/or	Green Belt in Bolton's Core Strategy 2011.	Approved 21 June 2021

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
	Hill Road, Westhoughton, Bolton		research and development (Class B1b) uses each with ancillary office space (Class B1a), yards, parking and associated facilities; associated education/training space (Class D1); ancillary food & drink (Class A3/A4/A5); and associated roads, drainage and utilities infrastructure; and landscape works and Full planning application for demolition of building/structures, upgrade to highway infrastructure, creation of new accesses to Wimberry Hill Road, drainage and	Emerging policy GMSF Publication Plan October 2020/28. The site was identified as Site Allocation 6, for around 440,000sqm of floorspace for Class B2 and B8 uses in a mix of large-scale distribution and advanced manufacturing. The site subject to the call in constitutes only a part of the proposed allocation, forming the closest part of the draft	

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
			utilities infrastructure, formation of development platforms, boundary landscaping and ecological enhancement area.	allocation site to the urban area, adjacent to the Westhoughton settlement boundary.	
3	APP/H4315/V/20/3265899 Land At Omega Zone 8, West Of Omega South And South Of The M62, St Helens, Merseyside	Omega St Helens Ltd & TJ Morris Ltd	Full planning permission for the erection of a B8 logistics warehouse with ancillary offices, associated car parking, infrastructure and landscaping; and outline planning permission for manufacturing B2 and logistics (B8) development with ancillary offices and associated access infrastructure works.	Green Belt in the St Helens Core Strategy, adopted in 2012 and St Helens Unitary Development Plan 1998. Emerging policy was the St Helens Local Plan, which was submitted for examination in October 2020. Now adopted.	Approved 11 November 2021

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
				Policy LPA04.1 allocates part of the call in site, around 31 ha, for employment development for B2 and B8 uses. Remainder is still Green Belt.	
4	APP/H4315/V/20/3253194 Former Parkside Colliery East of A49, Winwick Road, Newton Le Willows Wa12 8db	Parkside Regeneration LLP	The construction of up to 92,900m2 of employment floorspace (use class B8 with ancillary B1 (a)) and associated servicing and infrastructure including car parking; vehicle and pedestrian circulation space; alteration of existing access road including works to existing A49	Green Belt in the St Helens Core Strategy, adopted in 2012 and St Helens Unitary Development Plan 1998. Emerging policy was the St Helens Borough Local Plan	Approved 11 November 2021

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
			Junction; noise mitigation; earthworks to create development platforms and bunds; landscaping including buffers; works to existing spoil heap; creation of drainage features; substations and ecological works.	2020-2035, Submission Draft was taken to public consultation in 2019 and submitted for Examination in October 2020. The first Hearings were scheduled for May 2021. Now adopted, the eLP replaces the CS and the UDP in their entirety. Parkside west along with Parkside east was proposed to be removed from the Green Belt and allocated as B2/B8	

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
				employment land and a SRFI respectively, at the time of the decision.	
5	APP/H4315/V/20/3253230 & APP/M0655/V/20/3253232 Land Between A49 Winwick Road And A573 Parkside Road, Including A Proportion Of The Former Parkside Colliery Site And Land From The A573 Parkside Road To A579	St Helens Metropolitan Borough Council	Single carriageway link road between A49 Winwick Road (WA12 8EF) and A573 Parkside Road; at each location a signalised junction will be formed. The road then utilises the existing A573 Parkside Road to cross the M6 (via existing overbridge) before realigning Parkside Road to a new roundabout before heading east to A579 Winwick Lane to a newly formed roundabout. The section of	Site is within St Helens and Warrington Borough Council administrative areas. Part of the Site within St Helens is Green Belt in the St Helens Core Strategy, adopted in 2012 and St Helens Unitary Development Plan 1998.	Approved 11 November 2021

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
	Winwick Lane Connecting To M6 Junction 22		carriageway from the new Winwick Lane roundabout and the M6 Junction 22 will be a dual carriageway. The A573 and A579 will be realigned to the new roundabouts.	Part of the Site within Warrington is also located within the Green Belt as detailed in Warrington Local Plan Core Strategy, adopted in 2014. Emerging policy is the St Helens Borough Local Plan 2020-2035, Submission Draft, which was taken to public consultation in 2019 and submitted for Examination in October 2020. The first Hearings were scheduled for	

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
				May 2021. Now adopted, the eLP replaced the CS and the UDP in their entirety. Appendix 5 to the eLP sets out the specific requirements for the Parkside West allocation. This included reference to "Later phases of development should be served by a new link road from the east (linking to J22 of the M6)".	

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
				The Warrington Proposed Submission Version Local Plan 2017-203736 was published in March 2019. The Regulation 19 consultation period ended in June 2019. The draft plan at the time of the determination of the Call In, was yet to be submitted to the SoS for Examination. The plan was therefore not at a stage where material weight was attached to it.	

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
6	APP/H4315/W/20/3256871 Haydock Point - Land at A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens, WA12 0HL	Peel Investments (North) Limited	Outline planning permission with all matters other than means of access reserved for the development of up to 167,225sqm of B8/B2 (up to 20% B2 floorspace), ancillary office and associated site facilities, car parking, landscaping, site profiling and transport, drainage and utilities infrastructure.	Green Belt in the St Helens Core Strategy, adopted in 2012 and St Helens Unitary Development Plan 1998. Emerging policy is the St Helens Borough Local Plan 2020-2035, Submission Draft was taken to public consultation in 2019 and submitted for Examination in October 2020. The first Hearings were scheduled for May 2021. Now adopted, the	Dismissed 11 November 2021

Map Ref.	Reference Number & Site Location	Appellant	Proposal	Development Plan Allocation	Decision & Date of Decision
				eLP replaces the CS and the UDP in their entirety. Draft Policy LPA06 of the eLP, on Safeguarded Land, proposed the removal of land including the site from the Green Belt to meet long term development needs, well beyond the Plan period and subject to future review after 2035, at the time of the decision.	

Figure 1: Map of Locations of Appeal Sites Determined by Secretary of State

Map Ref 1;
Land at Junction 25 of the M6 Motorway, Wigan

Map Ref 2;
Land to West of Wingates Industrial Estate, Bolton

Map Ref 3;
Omega, St Helens

Map Ref 4 & 5;
Former Parkside Colliery 7 Link Road, Newton Le Willows

Map Ref 6:
Haydock Point, St Helens

Appeal Site;
Six 56, Warrington

Land at Junction 25 of the M6 Motorway, Wigan (Map Ref; 1)

1.4. The Secretary of State endorsed the Inspectors conclusion on page 4 of his decision notice, (CD4.128) which states "that there is an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally". He also agreed with "the Inspectors' analysis of need for employment land", along with their findings 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". The Secretary of State agreed in paragraph 12 (CD4.128) that no weight should be given to the Greater Manchester Spatial Framework but that "the evidence base underpinning it is a material consideration in this case". He further concurred with the Inspectors that this need cannot be met through existing or other non-Green Belt sites (paragraph 27 (CD4.128)). He noted that "it is highly material that the site is available now" (paragraph 25) and that the scheme will deliver much needed employment floorspace in a Borough that has consistently been unable to provide suitable and sufficient employment land and that "very substantial weight" should be accorded to the delivery of high-quality logistics floorspace (paragraph 27 (CD4.128). He confirmed that the development would accord with the objectives of the NPPF and address "the specific locational requirements" of the logistics sector and that "these locational benefits carry further significant weight" (paragraph 28 (CD4.128).

1.5. The Secretary of State confirmed that "weighing in favour of the proposal are the delivery of logistics floorspace which he accords very substantial weight. The locational benefits carry further significant weight. The socio-economic benefits also carry substantial weight. The biodiversity net gain and highway benefits collectively attract moderate weight" (paragraph 43 (CD4.128)) and hence that "overall the Secretary of State considers that the economic and

other benefits of the proposal are collectively sufficient to outweigh the harm to the Green Belt and to the landscape such that very special circumstances exist to justify permitting the development" (paragraph 44 (CD4.128)).

1.6. The Inspectors set out 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". They also noted on Page 40 of the decision (CD4.128) that "there is a similar situation within the wider North West region, with approximately nine months of supply". The Inspectors accorded significant weight to the up-to-date evidence base which "states that the M6 logistics hub in Wigan (extending into Warrington, St Helens and West Lancashire) provides a major cluster of warehousing and distribution activity with good accessibility to the motorway network" (paragraph 10.25 (CD4.128)) and that "there is an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally". In footnote 86 (CD4.128) "sub-regionally" is confirmed as "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". The Inspectors further noted that "demand for logistics floorspace is focused on the motorway corridors….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" (paragraph 10.28).

Land to West of Wingates Industrial Estate, Bolton (Map Ref; 2)

1.7. The Secretary of State, in his decision letter (CD4.129), agreed with the Inspectors that the proposed development would be '*inappropriate*' in its Green Belt location, giving rise to harm by definition, and that this harm carries substantial weight. However, he concurred (paragraph 15 (CD4.129) with the

Inspectors and concluded that "*there is persuasive evidence that a substantial planning need exists for major logistics and associated industrial development of the kind proposed in this application*" and hence this harm and any other harm is clearly outweighed by other considerations (paragraph 36 (CD4.129)).

1.8. The Secretary of the State further agreed (in paragraph 9 (CD4.129)) that whilst no weight can be given to the specific draft allocation in itself, the broad evidence of need for the type of employment land represented by the application site was material to the consideration of this application. He noted that the recorded deprivation level within Bolton is further evidence of need for the development and noted that there is evidence of unfulfilled enquiries for development of the kind proposed here. Overall the Secretary of State agreed with the Inspectors, that the evident need for development of the type proposed carried "*substantial weight*" in the planning balance and that the economic benefits of it carry "*very substantial weight in favour of the scheme*".

1.9. Furthermore, he affirmed the Inspectors conclusion that the proposed development would contribute substantially to the national policy imperative, expressed in paragraphs 80 and 82 of the NPPF, to promote and support a strong competitive economy, particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations.

1.10. The Secretary of State also agreed with the Inspectors that the development would contribute substantially to the supply of employment land evidently necessary to the economic recovery and well-being of Bolton. The Secretary of State also took into account the absence of any alternative sites of sufficient size and accessibility in the M61, and the fact that the development would directly and indirectly generate up to 2,500 jobs and other economic benefits in an area of severe economic deprivation and unemployment, encouraging business commitment and creating opportunities for enhancement of skills

among the workforce. The Secretary of State therefore concluded that '*very special circumstances*' exist to justify permitting the development.

Omega, St Helens (Map Ref; 3)

1.11. The Secretary of State agreed with the Inspector on Page 3 of his decision letter (CD4.130), that the proposal is '*inappropriate*' development in the Green Belt, which would cause '*significant harm to openness*', and would conflict with some of the '*purposes*' of including land in the Green Belt. Overall, he considered that these harms must carry substantial weight against the application in the overall Green Belt balance in accordance with paragraph 148 of the Framework.

1.12. The Secretary of State set out on Page 4 (CD4.130) that he agreed "that St Helens has an important role to play in the economic growth and regeneration of the Liverpool City Region, and that relying on previously developed land alone will not deliver the wider regeneration which the Core Strategy seeks to secure for St Helens". The Secretary of State agreed with the Inspector`s findings that "St Helens has fallen behind its immediate neighbours and other areas in the Liverpool City Region and beyond in its employment opportunities and deprivation scores, and that a major shift to bring forward new attractive employment sites is needed to halt or reverse this position".

1.13. The Secretary of State reached the conclusion that it is clear from the evidence that "*there is a shortage in the supply of readily available sites to meet the needs of major logistics operators in the North West*". He further agreed with the Inspector's analysis of the employment evidence, that there is a clear need for development of the type proposed, and that the supply of employment land carries significant weight in the planning balance. He attached "*very significant*

weight" to the socio-economic benefits delivered by the proposal (paragraph 25(CD4.130)).

1.14. The Secretary of State confirmed that "weighing in favour of the proposals are the supply of employment land which carries significant weight, the socio-economic benefits which also attract very significant weight and the construction jobs which carry moderate weight" (paragraph 42) (CD4.130). He notes that "weighing against the proposals are the Green Belt harm which carries substantial weight, the harm to character and appearance which carries significant weight and the loss of agricultural land which carries limited weight. Also weighing against the proposal is the 'less than substantial' harm to heritage assets which carries great weight". Overall the Secretary of State confirmed that "very special circumstances" exist and that the "material considerations in this case indicate a decision which is in line with the development plan – i.e. a grant of permission" (paragraph 46 (CD4.130)).

1.15. The site lies within St Helens Borough but the Inspector`s confirmed in paragraph 12.31 (CD4.130) that "the SHLP proposes that the outline part of the application site be allocated for employment to meet the employment needs of Warrington. I give little weight to this proposed allocation given that the plan is not adopted and is still in examination. I am however able to give weight to the evidence behind it, the evidence which is before me". He further noted in paragraph 12.33 (CD4.130) that "I can place more weight on the evidence supporting employment need and options which underpins it especially since that evidence is up to date and is not disputed".

1.16. The Inspector confirmed in paragraph 12.71(CD4.130) that "the applicant argues that there is no suggestion by the Climate Change Committee, an independent statutory body established under the Climate Change Act 2008,

that there should be a moratorium on road based logistics and I have no evidence to the contrary".

Former Parkside Colliery Newton Le Willows (Map Ref; 4 &5)

1.17. The Secretary of State agreed with the Inspectors that the proposed development constitutes *'inappropriate'* development in the Green Belt giving rise to harm by definition, which carries substantial weight. However, the Secretary of State concluded in paragraph 28 (CD4.131) *"that there is clearly a pressing commercial need for new logistics floorspace at a local, Liverpool City Region 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".*

1.18. The Secretary of State confirmed in paragraph 43 (CD4.131), that he agreed with the Inspectors' conclusion "that the development cannot be accommodated on a non-Green Belt site or a more preferable Green Belt site" and hence that "the lack of an alternative site carries significant weight".

1.19. The Secretary of State confirmed in paragraph 52 (CD4.131) that "weighing in favour of the proposal are the supply of employment land, which carries very substantial weight. The regeneration benefits also carry substantial weight and the locational benefits of the site carry significant weight. The lack of an alternative site carries significant weight…" The Secretary of State confirmed in paragraph 54 (CD4.131) that "very special circumstances" exist to justify permitting the development.

1.20. The Inspectors stated in paragraph 12.28 (CD4.131) that "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". They further noted that "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 154,712 m2 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.

1.21. In paragraph 12.40 (CD4.131) the Inspectors confirmed that "If the need identified above is not met, then it is likely that future investment as well as existing companies who want to expand would relocate to other areas". They also noted in paragraph 12.134 (CD4.131) that "the site boasts excellent accessibility to the strategic road network and is located in the M6/M62 'sweet-spot'" and in paragraph 12.172 (CD4.131) they noted the indisputable locational benefits of the site, being "roughly equi-distant from Liverpool and Manchester" as well as having convenient access "to the multi-modal supply chain facilities in the region, including the Port of Liverpool, Manchester and Liverpool Airports".

1.22. In paragraph 12.163 (CD4.131) the Inspectors concluded that "the economic evidence presented to the inquiry was unequivocal that there is sufficient commercial demand in the M6 sub-region to accommodate the PP1 scheme as well as Symmetry Park and Haydock Point. The scheme at Wingates, Bolton falls outside of the M6 sub-corridor. It should also be noted that the PP1

scheme is also geared towards satisfying an identified need for LCR rather than Greater Manchester which is the case for Symmetry Park".

1.23. The Inspectors also confirmed in paragraphs 12.104 – 12.108 (CD4.131) that "NPPF paragraphs 80 and 82 as well as the PPG make clear that the delivery of road-based logistics is 'critical' to the country's economic wellbeing. …In his decision letter, the SoS made it clear that a road-based freight proposal would not be unacceptable as a matter of principle. The Panel considers that this conclusion should apply with equal weight to the PP1 scheme".

1.24. The Inspectors ascribed "*great importance*" to the NPPF's requirement to build a strong, competitive economy; "*significant weight*" to the need to support economic growth; "*very substantial weight*" to the need for employment land; "*significant weight*" to the locational benefits; and "*significant weight*" to the lack of an alternative site.

1.25. With reference to the Parkside Link Road decision, the Secretary of State agreed with the Inspectors' conclusions that the development would cause moderate harm to '*openness*'(CD4.131). However, he also agreed that there is a demonstrable national policy support for the storage and distribution operations in suitably accessible locations. He further agreed that the economic evidence supporting the Parkside Link Road is inextricably linked with the need for the wider Parkside development for which there is a compelling need and there is undeniable policy support for the PLR at a local, regional and national level.

Haydock Point, St Helens (Map Ref; 6)

1.26. The Secretary of State dismissed the Haycock Point appeal which was not supported by the Local Authority. He considered that the appeal scheme would have very significant impact upon the "*openness*" of the Green Belt and

would have harm to two of the "*purposes*" of Green Belt (prevention of urban sprawl and merging of neighbouring towns) along with "*blatant*" encroachment into the countryside.

1.27. He considered that the appeal site is "optimally located for warehousing and logistics development …. and is strategically placed at the heart of the motorway network of the UK" (paragraph 24 (CD4.132)). In paragraph 35 (CD4.132) he "agreed that based upon the employment needs of St Helens Borough alone, there was no overriding need for the appeal site to provide employment. However, he further agrees that it is necessary to take into account that there exists an immediate, acute shortage of land for large-scale logistics employment in the sub regional Primary Market Area of St Helens, Wigan and Warrington, within the M6 corridor. He further resolved that this is particularly the case in regard to the need for storage and distribution facilities, at a variety of scales, including the largest scale, in accessible locations". He gave "significant weight" in favour of this sub-regional need.

1.28. He indicated that "weighing in favour of the proposal is the acute medium term sub-regional need which attracts significant weight" and "the economic benefits including job creation which also attracts significant weight" but he considered that "the benefits of the proposal are not collectively sufficient to clearly outweigh the harm to the Green Belt and other harms such that very special circumstances would exist to justify permitting the development".

Appendix DR05 – Alternative Sites Assessment Update Statement

Langtree PP & Panattoni

Six 56 Warrington

DR05 - Alternative Sites Assessment

Update Statement

Revision C 6 April 2023

Report Author	Jenny Ray
Report Date	6 April 2023
Project No.	4055
Document Ref.	P4055-SPA-RP-TP-0035
Revision	C

Contents

1. Introduction
2. Methodology
3. Assessment
4. Conclusions
5. Appendices

Appendix 1 – Plan of Identified Sites and Key
Appendix 2 – Summary Tables

1. Introduction

1.1. This is an Update Alternative Sites Assessment (update ASA) to the original Alternative Sites Assessment (original ASA) (CD4.101) and is produced to support David Rolinson's Planning Evidence for the Call-in Inquiry. This relates to the Outline Planning Application (OPA) for a strategic employment development on land adjacent to Junction 20 of the M6 Motorway and Junction 9 of the M56 Motorway (known as Six 56 Warrington).

1.2. The original ASA (CD4.101) was produced to consider whether there were potential alternative sites that could accommodate the Application proposal in whole or part. During the course of Warrington Council's consideration of the OPA, updated details associated with the original ASA (2018) were provided in the Replacement Planning Statement (October 2021) (CD4.34). Given the time that has lapsed since the production of the original ASA (2018), and the Replacement Planning Statement (2021), this Update ASA has been produced to consider any changes in circumstances that may affect the conclusions of the original ASA (2018).

1.3. This update ASA should therefore be read in conjunction with the original ASA (2018) (CD4.101) and the Replacement Planning Statement (October 2021) (CD4.34). It has been prepared to review the following matters:

- Whether the status or circumstances of any of the sites previously assessed has changed over the time that has lapsed;
- Whether there are any new sites that need to be included in the update ASA.

1.4. This update ASA is undertaken in the context that the emerging Local Plan (Updated Proposed Submission Version Local Plan (UPSVLP) 2021–2038)

(CD3.1) identified three strategic sites for employment allocation – the South East Warrington Employment Area (SEWEA) (which includes the Application Site - Six56), Fiddlers Ferry and Omega West (See **Appendix 1** for site location plan). The SEWEA (including the Application Site - Six 56) and Omega West are within the Green Belt. The employment development at Fiddlers Ferry is previously developed non-Green Belt land, however it requires new residential development within the Green Belt to cross fund / enable the delivery of this employment development, due to the costs of bringing forward a former power station for redevelopment.

1.5. The Application proposals were considered in the context of the emerging Local Plan which has identified the Application Site as part of a draft employment allocation (SEWEA) to be removed from Green Belt. The emerging Local Plan evidence base includes the Warrington Green Belt Review in 2021 (CD4.99), the Warrington Economic Development Needs Assessment (EDNA August 2021) (CD4.93), along with further site-specific documents. This Update ASA therefore has had regard to the approach taken in these documents.

2. Methodology

Approach

2.1. The original ASA (2018) considered the potential for alternative sites to accommodate a new logistics park to meet the employment needs of Warrington. This update ASA Statement utilises the same methodology as the original ASA (2018), which includes the scope for disaggregation, area of study, consideration of potential sites and the three-stage assessment of sites (see original ASA (2018) CD4.101 for the full methodology).

2.2. The summary table at **Appendix 2** provides a full summary of the current position of the sites considered within the original ASA (2018) to confirm any changes in circumstances.

2.3. One new site - Omega West (located within St Helens' authority area) has been identified for consideration, given its proposed allocation for strategic employment in the emerging local plan.

2.4. The assessment for the original ASA (2018) takes a series of stages.

2.5. **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. This is not considered to have changed in the time that has passed since the production of the original ASA (2018) and as such is not reassessed in this update ASA. Fiddlers Ferry was dismissed at this stage of the original ASA (2018) assessment due to its secondary location for logistics but further consideration is given to this site within this updated ASA as it is a proposed employment allocation within the emerging Local Plan. This is set out within Section 3 of

this Update ASA Statement and incorporates details from the Replacement Planning Statement produced in 2021.

2.6. **Stage 2** then considers a range of additional factors to establish the suitability of a site for logistics development such as site shape and proximity to workforce. These factors are not considered to have changed in the time that has passed since the production of the original ASA (2018) and as such are not reassessed in this update ASA.

2.7. **Stage 3** then assessed the remaining sites and considered the approach taken by the emerging Local Plan and Green Belt Assessment (2016 and 2017). The Stage 3 Green Belt Assessment has therefore been reviewed as part of this update ASA to ascertain whether the updated Green Belt Assessment (2021) that form the basis of the local plan evidence base have any effect on the assessment and conclusions derived in the original ASA (2018). The status of each of the sites have also been reviewed and any relevant updates provided.

3. Assessment

Identification of Stages

3.1. In line with the above methodology, a total of 9 sites had been identified in the original ASA (2018) (CD4.101), of which 7 progressed to Stage 2 of the Assessment and also to Stage 3 of the Assessment. The 9 sites are set out in the table below, and a Plan showing the location of all the sites is included at **Appendix 1**:

Site Ref	Site Address	Size (Ha)
1.	Omega North Extension.	13.5 ha
2.	Burtonwood Brewery & White House Farm	4.22 ha
3.	Port Warrington	74.19 ha
4.	Land North of Barley Castle Lane, Appleton (Stobart's proposed NDC site)	15.3 ha
5.	Land at Barley Castle Farm. (8.69 ha) Land at E end of Barleycastle Lane (North Parcel). Land at E end of Barleycastle Lane (South Parcel). *These sites are considered as one consistent with the emerging Local Plan	19.64 ha
6.	Land South of Barley Castle Lane Land at Barley Castle Lane (0.5 ha) *These sites are considered as one consistent with the emerging Local Plan	9.97 ha
7.	Omega South Plot 7E (Mount Park) / Omega South Plot 7F (Mount Park) Comprising: Unit 2 136,963 ft² (completed Dec 2018) Unit 3 90,771 ft² (completed Dec 2018) Unit 4 183,669 ft² (to be completed by Feb 2019)	18.27 ha
8.	Omega South Zone 1B	17.99 ha
9.	Fiddlers Ferry Power Station *includes main power station, ash lagoons, rail sidings, pump house and agricultural land	330 ha
10.	Six 56, Warrington (the Application Site)	96 ha

Table 1: Location of Sites

3.2. The summary table at **Appendix 2** provides a full summary of the current status of the sites taken to the Stage 3 assessment (i.e. sites 1, 4 5, 6, 7, 8 and 10).

3.3. In addition, **Appendix 2** considers Omega West in detail as the only new sites to be considered. This site is identified in the table below and shown on the plan at **Appendix 1** as site 11:

Site Ref	Site Address	Size (Ha)
11.	Omega West	75.22 ha

Table 2: Location of New Site

3.4. This assessment concludes that three of the four units are under construction with named end users expected to be occupied during 2023. These are therefore already "*committed*" and no longer available as a comparative site to the Application proposal. The fourth unit is the subject of a reserved matters application by St Helens Council, with marketing material suggesting this is available for construction in Q3 2023. A brook diversion required to facilitate the delivery of this unit is already in construction. Individually this unit would not be able to accommodate the full amount of employment development proposed at the Application proposals and as such is not a comparable site.

Stage 1 and 2 Assessment

3.5. As detailed within Section 2: Methodology, the assessment of Stages 1 and 2 for sites included within the original ASA (2018) have not been revisited, and as such the assessment within paragraphs 3.6 to 3.8 of the original ASA (2018)

remains relevant to the assessment of alternative sites. This is with the exception of Fiddlers Ferry which is given further consideration below, due to its proposed allocation as a strategic employment site within the emerging local plan.

Fiddlers Ferry

3.6. The current Fiddlers Ferry Power Station is identified within the Warrington Core Strategy (Adopted July 2014) as Policy PV2: Fiddlers Ferry (CD2.1). The main Fiddlers Ferry Power Station site is not within the Green Belt, however, the policy specifies that any additional land required within the Green Belt would be considered against national Green Belt policy.

3.7. The site at the former Fiddlers Ferry Power Station is allocated in the emerging Warrington Local Plan 2021-2038 as a mixed use employment and housing site through Policy MD3.1 (CD3.1). The site is anticipated to deliver 101ha of employment land and a minimum of 1,310 homes.

3.8. Policy MD3.1 identifies that 82ha of land from the Green Belt will be removed to accommodate the new housing areas of the site. The additional land for residential use is justified to facilitate the redevelopment of the Fiddlers Ferry Power Station site for employment. The Statement of Common Ground between Warrington Borough Council and Peel L&P (Holdings) UK Ltd (SG02: August 2022) (CD4.134) states in paragraph 3.21:

> "**Phase 1 – Full Scheme Appraisal: Commercial Only (Appendix 3):** This appraisal is based on assessing the full quantum of commercial development which is proposed to come forward on Phase 1 of the development area (land to the north of the railway line), but excludes the proposed residential development on the agricultural

land. This appraisal retains the same demolition, remediation, commercial abnormal costs and strategic infrastructure cost assumptions as the full phase appraisal other than the residential S106 contributions which are excluded. This appraisal demonstrates that the commercial development alone is not sufficiently viable to cross-subsidise the upfront demolition and remediation costs, as the residual land value – whilst still comfortably positive at c. £22m – does not exceed the BLV. This appraisal therefore demonstrates that the residential element of the scheme is required to generate the additional upfront surplus to cross-subsidise the demolition and remediation costs early in the development period."

3.9. This demonstrates and confirms that part of the '*exceptional circumstances'* for the residential element of the scheme is to cross subsidise the employment part of the scheme for viability reasons. It also confirms that this residential element is required "*to generate upfront surplus..*" to cross-subsidise the demolition and remediation costs. This demonstrates that the value from the residential development which lies within the Green Belt is required to fund the demolition and remediation. This will have implications upon the delivery of the employment element of the site.

3.10. The Local Plan Green Belt Assessment (August 2021) (CD4.99) highlights that the northern section of the site makes a '*strong*' contribution to Green Belt '*purposes*' and the southern section makes a '*moderate*' contribution to Green Belt '*purposes*'.

3.11. The Warrington Economic Development Needs Assessment (EDNA, August 2021) (CD4.93) states in Table 14 (page 99):

> "Located some five miles from the M62, Fiddlers Ferry would struggle to compete for major requirements with nearby locations which enjoy direct motorway access, including Six56, a western expansion of Omega and other schemes proposed in St Helens.
>
> It is likely that the employment uses will be dependent on the housing to provide an element of cross funding, particularly to support the large site clearance and remediation costs. Thus regardless of the stated masterplan timetable, it is likely that at least some of the housing will need to be developed before the employment and that the wider scheme will not be viable without a certain quantum of housing. As the housing is to be developed on Green Belt, releasing the Green Belt will likely be key to delivery of the brownfield land."

3.12. In relation to deliverability the EDNA considers that

> "the site has good A-Road access but its distance from the M62 makes it less desirable to major logistic occupiers than other locations which enjoy direct motorway access. This weaker position will likely have some impacts on the speed at which B2/B8 options are taken up but may mean that demand from local firms outweighs demand from strategic businesses. Given the constraints on demand and the time could take to fully decommission and clear the power station, it is unlikely the employment site will be fully developed by 2030, as stated in master planning".

3.13. The EDNA therefore grades Fiddlers Ferry as A-/B-, which is a constrained site with a range of constraints needing to be addressed, which is alongside a number of sites sitting in fourth place in relation to ranking of sites in the EDNA.

3.14. Local Plan reference CD31 (CD4.135) is an updated note on the masterplan delivery programme. This shows demolition of the power station through to December 2026 with the employment coming forward in three phases with the first phase being delivered by September 2026, assuming a planning application is submitted in the autumn of 2022. However, at present according to the Public Access System, no planning application has been submitted for redevelopment. A Screening Opinion was however sought in 2021 for the demolition of the power station buildings and a subsequent application submitted in September 2022 for the demolition, which is pending a decision. The consultation for the Development Framework for the site in autumn 2022 shows the first phase comprising four units totalling 1.35 million sq. ft. The developers website shows that consultation on Phase 1 closed in December 2022.

3.15. The programme assumes that each phase will come forward in a staged manner roughly two years apart with the third phase complete by March 2030.

3.16. The delivery programme assumes that planning permission for the northern parcel is granted by June 2024 and therefore that it commences delivery from July 2025 to July 2030. Given this application is yet to be submitted, it is reasonable to expect that these timescales will be delayed. Similarly no residential application has been submitted to allow the cross enabling of the residential to fund the demolition and remediation for the employment scheme.

3.17. The EDNA (CD4.93) confirms in Table 14 (page 99) that:-

> "It is noted that full decommissioning and clearance of the power station could take up to seven years from an approx. start date of spring 2020, based on experience elsewhere. Thus, to meet the

identified timetable it is assumed employment land will come forward on a phased basis, with the 56 ha Power Station Site possibly not fully available till 2027. If that proves the case, the masterplan assumption that the full completion of the employment land will occur by 2030 seems very ambitious, with completion in the 2030s more likely".

3.18. The residential element of the site lies in the Green Belt and hence will require the completion of the Warrington Local Plan process to secure its allocation prior to the grant of planning permission for it. Funding from this element is required for demolition and remediation of the employment land and hence this is a precursor to delivery of the employment land. The timescales for delivery of the employment land set out in the EDNA (completion in the 2030s) therefore may be optimistic.

Stage 3: Assessment Against Green Belt Purposes

3.19. As shown in **Appendix 2**, **Table 1,** Omega North, Omega South and Omega South 1B are no longer available due to having secured planning permission and either being developed out and occupied, or in the final stages of construction. As such, they have not been reconsidered through the Stage 3 Assessment as they are "*committed*" development rather than potential alternative sites to the Application proposal.

3.20. The additional new site to be considered through this Update ASA is Omega West. As shown in **Appendix 2**, **Table 2,** this site has three of the four units under construction (unit 1, 2 and 3) with known end users and these units are therefore already "*committed*" and no longer available as a comparative site to the Application proposal. The fourth unit (unit 4) is currently being marketed as a unit of up to 417,144sqft (38,755sqm) being available for development from Q3 2023, with a reserved matters submission currently under

consideration by St Helens Council. Furthermore, construction is underway for a brook diversion required to enable the construction of unit 4. However, this is a single unit and could not accommodate the full amount of development proposed at the Application proposal and as such is not considered further. The Plan extract below shows the units:

Figure 1: Omega West (extract from Omega Masterplan)

3.21. The remaining four sites have however been reconsidered against the criteria identified in Stage 3 of the methodology, taking account of the updated Green Belt Sites Selection Report (August 2021) and scored as follows:

Site Address		Green Belt Purpose					Score
		1	2	3	4	5	
1	Omega North						N/A
4	Land at Barley Castle Lane						
5	Land South of Barley Castle Farm.						
6	Land South of Barley Castle Lane						
7	Omega South						N/A
8	Omega South Zone 1B						N/A
10	Six 56 Warrington						

Table 3: Stage 3 Assessment

3.22. The results of Stage 3 indicate that of the four sites that were taken through to this stage for re-assessment, all of them scored sufficiently to be taken forward to a further level of scrutiny (all scored amber or neutral). It is therefore considered worthwhile considering these sites in more detail against the Warrington EDNA (2021) (CD4.93) and Green Belt Review (2021) (CD4.99). Whist NPPF (21) has been updated since the original ASA, it still states that (planning) decisions should help create the conditions in which businesses can invest, expand and adapt and goes on to say 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 (para 81). Importantly paragraph 83 is explicit that planning decisions should "*recognise and address the specific locational requirements of*

different sectors which includes… storage and distribution operations at a variety of scales and in suitably accessible locations."

3.23. The EDNA (2021) (CD4.93) recognises the part Covid-19 has had in the growth of e-commerce, which already had a strong logistics market, with record take up for B8 in 2020, 95% of which was in the big shed market. However it does note that the North West lacks the supply of sites to fully capitalise on the growth.

3.24. The EDNA identifies the Application Site (Six56) as A+ grade as it considered the site to have limited constraints and could be made available almost immediately, subject to planning. This is the only site that receives this ranking within the EDNA and is identified as Option One for an employment site in the EDNA recommendations.

3.25. If the Secretary of State grants planning permission for the Application proposal towards the end of 2023, reserved matters applications and condition discharges could be progressing during 2024 to allow enabling works to commence at the end of 2024. This would facilitate delivery of the employment units between 2025 and 2031.

3.26. As set out within the original ASA (2018), Sites 4, 5 and 6 (Barley Castle) do not benefit from immediate access to the motorway and therefore would be considered a secondary location in this respect. However these sites can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive SEWEA proposal. The Barleycastle sites (which are considered as six sites within the EDNA), are graded as A+/B+ or B+ within the EDNA. They are considered

to be relatively unconstrained and could be brought forward immediately, subject to planning. But these sites, either individually or as a whole, could not accommodate the full amount of development proposed at Application proposal. These sites are identified as Option Two in the EDNA recommendations.

3.27. The updated Green Belt Assessment (2021) (CD4.99) confirms that the removal of the SEWEA will not harm the overall function and integrity of the Green Belt in the area and is suitable for release to meet the critical need for employment land in the area. It states:

> "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."

3.28. As noted within the Council's Green Belt Assessment the new Green Belt boundary is along strong defined long term and permanent boundaries, in accordance with national policy and guidance. The SEWEA is therefore a suitable site to be released to meet the critical need for employment land in the area.

3.29. The EDNA confirms that the available land at Omega could be taken up within one year. The Omega West draft allocation site comprises 31.22ha which although in St Helens, has been agreed to count towards Warrington's employment needs. The remaining 44ha is in the Green Belt and is not however currently accounted for in either Warrington or St Helens' requirements.

3.30. In conclusion, the Application Site is the highest ranked site in the EDNA (CD4.93) in terms of meeting market needs and delivery. It can therefore meet the short and medium term employment (especially logistics) requirements. The Omega South and Omega South Zone 1B are built out and occupied, so "*committed*". The Omega West site has three out of the four units under construction and therefore these are already "*committed*" and is no longer available as a comparative site to the Application proposal. The fourth unit is currently being market as being available for development in Q3 2023, with a reserved matters submission under consideration by St Helens Council and a brook diversion to facilitate the unit under construction. However, individually, this site would not accommodate the Application proposals. The Fiddlers Ferry site is not as well located as the Application Site (or the rest of the SEWEA) to meet the needs of logistics operators and its site specific and policy constraints mean that it would only be available to meet medium to long term employment needs which are more likely (according to the EDNA) to be local in nature ("*Given this constraint, greater demand may come from the local market, with the scheme linking as much to the economy of Widnes as Warrington*").

3.31. Nevertheless, the Submission Draft Local Plan (CD3.1) makes clear it will be necessary to bring forward all the sites considered within the third part of the assessment to meet the employment land requirement within the borough over the plan period.

4. Conclusions

4.1. In conclusion, the original Alternative Sites Assessment (2018) (CD4.101) and this update ASA has considered whether development that is being proposed at the Application Site (Six56) could be accommodated on a more suitable site either within or outside of the Green Belt.

4.2. The update ASA has demonstrated that a number of sites at Omega have been developed and are now occupied or are in the process of being delivered for named end occupiers. The new Omega West site has three of the four units are under construction with named end users expected to be occupied during 2023. These are therefore already "*committed*" and no longer available as a comparative site to the Application proposal. The fourth unit is the subject of a reserved matters application by St Helens Council, with marketing material suggesting this is available for construction in Q3 2023. A brook diversion required to facilitate the delivery of this unit is already under construction. Individually this unit would not be able to accommodate the full amount of employment development proposed at the Application proposals and as such is not a comparable site.

4.3. There are therefore three remaining areas that have been considered through this update ASA. These are Fiddlers Ferry (site 9), sites at Barleycastle (sites 4, 5 and 6) and the Application Site (Six 56) (site 10).

4.4. Whilst Fiddlers Ferry was discounted at Stage 1 of the original ASA (2018) it has been considered further in this update ASA due to it being identified as one of the three proposed strategic employment site allocations within the Submission Draft Local Plan (CD3.1) and it is identified as a potential site for allocation within the EDNA (CD4.93). The EDNA grades Fiddlers Ferry as A-/B- as whilst the employment would be on previously developed land and has good A-Road access, it is distant from the Motorways and therefore less

desirable for logistics, which may affect its rate of delivery. The employment delivery also requires cross enabling by residential development, that is currently located within the Green Belt. Whilst the promotor's delivery programme suggests the first phase (1.35msqft) of employment coming forward in September 2026, this assumed a planning application would have been submitted in autumn of 2022, which has not yet occurred. The site specific and policy constraints mean that it would only be available to meet medium to long term employment needs which are more likely (according to the EDNA) to be local in nature.

4.5. The Barleycastle sites (which are considered as six sites within the EDNA), are graded as A+/B+ or B+ within the EDNA (CD4.93). The EDNA considered them be relatively unconstrained and that they could be brought forward immediately, subject to planning, but these sites, either individually, or as a whole could not accommodate the full amount of development proposed at the Application Site (Six 56) and they don't rank as highly in the EDNA as the Application site. The Barleycastle sites are identified as Option Two in the EDNA recommendations.

4.6. The Application site (Six 56) is the only site with the highest grading within the EDNA (CD4.93), with A+ grade. This was as a result of it having limited constraints, good accessibility to the motorways and that it could be made available almost immediately, subject to planning (i.e. this Call-In Inquiry). This site is identified as Option One in the EDNA recommendations. If the Secretary of State grants planning permission for the Application proposal towards the end of 2023, reserved matters applications and condition discharges could be progressing during 2024 to allow enabling works to commence at the end of 2024. This would facilitate delivery of the employment units between 2025 and 2031, thereby allowing the Application Site to meet short and medium term employment needs.

4.7. Both the original ASA (2018) and this update ASA have concluded that there are no sites that are suitable for either the development as a whole, or indeed its component parts (scope for disaggregation). The Council's EDNA (CD4.93) and Submission Draft Local Plan 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.

4.8. The original ASA (2018) and this update ASA have concluded that:

- The ASA methodology remains robust.
- The only new site for consideration as part of the update ASA is Omega West, which has three out of the four units being delivered and expected to be occupied during 2023. The fourth unit is currently the subject of a reserved matters under consideration by St Helens Council and as such could be under construction later in 2023, with the brook diversion required to accommodate this unit already under construction. As such there is limited availability remaining at Omega West, and could not deliver the level of development as a whole proposed at the Application Site.
- The other Omega sites (Omega South and Omega South Zone 1B) have now been delivered and as such, are no longer available.

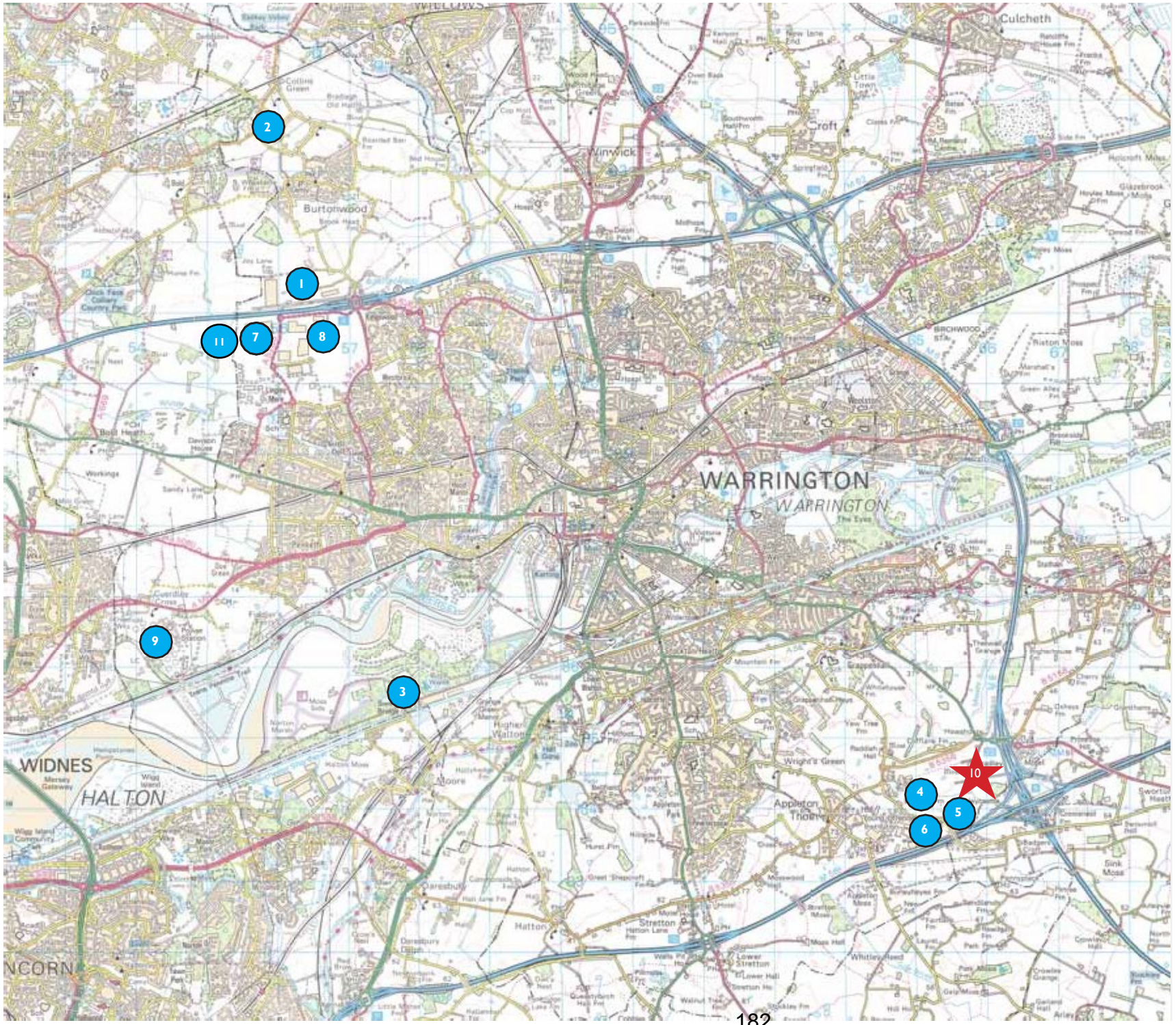
- The only non-Green Belt site capable of meeting some employment development is Fiddlers Ferry, however, this requires residential development in the Green Belt to cross enable the delivery of the employment development, due to the high costs of demolition and remediation of the former power station site. Furthermore, this site is more remote from the motorways to render it a less preferrable option for logistics developers and more likely to meet local needs.

- The Application Site (Six 56) performs best within the Council's EDNA and its Green Belt review confirms the site is a suitable site to be released to meet the critical need for employment land in the area.

- There are no sites that are suitable to accommodate either the development as a whole, or indeed its component parts (scope for disaggregation) on land outside of the Green Belt within Warrington or within the current Warrington Green Belt.

5. Appendices

Appendix 1 – Plan of Identified Sites



spawforths

architects | masterplanners | planners

KEY

1. Omega North Extension
2. Burtonwood Brewery & White House Farm
3. Port Warrington
4. Land North of Barley Castle Lane
5. Land at Barley Castle Lane
6. Land South of Barley Castle Lane
7. Omega South Plot 7E / 7 F
8. Omega South Zone 1B
9. Fiddlers Ferry Power Station
10. Six 56 (The Application Site)
11. Omega West

ALTERNATIVE SITES ASSESSMENT PLAN

Appendix 1 – Key

Sites considered within the original ASA (2018):

Site Ref	Site Address	Size (Ha)
1	Omega North Extension	13.5
2	Burtonwood Brewery & White House Farm	4.22
3	Port Warrington	74.19
4	Land at Barley Castle Lane, Appleton	15.3
5	Land South of Barley Castle Farm (including land at the east end of Barleycastle Lane)	19.64
6	Land South of Barley Castle Lane	9.97
7	Omega South	18.27
8	Omega South Zone 1B	17.99
9	Fiddlers Ferry Station	330
10	Six 56, Warrington	97

Additional sites considered in this ASA Update Statement:

Site Ref	Site Address	Size (Ha)
11	Omega West	75.22

Appendix 2 – Summary Tables

Appendix 2

Table 1 - Update for Sites within the update ASA (Stage 3 sites) that were previously considered in original ASA (2018)

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
1	**Omega North Extension**	13.5ha	This site would not be able to accommodate the full amount of employment development proposed for the Six 56 site.	Stage 3	Substantially completed.	N/A	Site no longer available.
4	**Land at Barley Castle Lane**	15.3ha	The site does not benefit from immediate access to the motorway and therefore would be considered a	Stage 3	Dismissed at Appeal (LPA Ref: 2017/31757 / PINs Ref; APP/M0655/W/19/3222603)		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			secondary location in this respect. However this site can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it was considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive Garden Suburb proposal.		for Green Belt reasons rather than any evidence of a lack of demand. Proposed Strategic Site Allocation in Submission Version of the Local Plan (Sept 2021) as part of South East Warrington Employment Area (SEWEA) allocation.		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			Individually, this site would not be able to accommodate the full amount of employment development proposed for the Six 56 site. This site was for a specific end user, for which the application was the subject of a planning appeal. The site was therefore not considered available.				
5	**Land South of Barley Castle Farm**	19.64ha	The site does not benefit from immediate access to the motorway and therefore would be considered a secondary location in this respect.	Stage 3	Proposed Strategic Site Allocation in Submission Version of the Local Plan (Sept 2021) as part of South		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			However this site can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it was considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive Garden Suburb proposal.		East Warrington Employment Area (SEWEA) allocation.		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			Individually, this site would not be able to accommodate the full amount of employment development proposed for the Six 56 site.				
6	**Land South of Barley Castle Lane**	9.97ha	The site does not benefit from immediate access to the motorway and therefore would be considered a secondary location in this respect. However this site can be accessed from the motorway network without the need for vehicles to pass through any built-up residential areas. Therefore, it	Stage 3	Proposed Strategic Site Allocation in Submission Version of the Local Plan (Sept 2021) as part of South East Warrington Employment Area (SEWEA) allocation.		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			was considered that the issue of lack of direct access to the motorway could be mitigated by improving the local highway network, especially as part of the comprehensive Garden Suburb proposal. Individually, this site would not be able to accommodate the full amount of employment development proposed for the Six 56 site.				

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
7	**Omega South (Plot 7E and 7F)**	18.27ha		N/A	Completed and occupied by Jung Heinrich, the Delivery Group and Royal Mail	N/A	Site no longer available.
8	**Omega South Zone 1B**	17.99ha		N/A	Completed and occupied, includes Gousto and Amazon.	N/A	Site no longer available.
10	**Six 56 Warrington**	96ha	The Site has direct access to the motorway network and is an optimal location. The only site that meets all the requirements of the Council's EDNA in terms of direct access to the motorway network, meeting the	Stage 3	The Application Site, the subject of this Call In Inquiry. Proposed Strategic Site Allocation in Submission Version of the Local Plan		

ASA ref no. (ASA 2018)	Site Address	Indicative Site area (hectares)	Summary of ASA (2018) Assessment	Site Score, ASA (2018)	Updates as at March 2023	Revised Score (Update ASA)	Comments on scoring
			demand for a new strategic site along the M58 and being able to accommodate the full range of employment requirements within the borough.		(Sept 2021) as part of South East Warrington Employment Area (SEWEA) allocation.		

Sites – Status Updates

Table 2 - Additional Sites not previous considered through the ASA (2018)

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
11	Omega West	Within St Helens Authority Area.	75.22ha	Part Green Belt / Part allocated for employment development	Hybrid Planning Permission (November 2021) (LPA Ref: P/2020/0061/HYBR, PINs Ref: APP/H4315/V/20/3265899). Full permission element is **under construction** - TJ Morris Ltd (trading as Home Bargains).	N/A	Three of the four units associated with this site are under construction and due for occupation during 2023 with known end users. The majority of this site is therefore no longer

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					Outline element - subsequent Reserved Matters for Units 2 and 3 approved 01-7-2022 (LPA Ref: P/2022/0091/RES and P/2022/0202/RES). **Under construction** with expectation to be occupied during 2023. Both have known occupiers, with Iceland Foods being named for Unit 3. Unit 4 is being marketed as 'Omega 400' for 38,755 sqm / 417,155sqft, and		available to meet wider market needs. With a reserved matters submission for the fourth unit under consideration by St Helens Council, construction could commence by Q3 2023.

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					ready for development in Q3 2023. A **Reserved Matters submission is currently under consideration** by St Helens Council (Ref: 2023/0189/RES). The brook diversion required to accommodate Unit 4 is under construction (approved through Reserved Matters LPA Ref: P2022/0748/RES in February 2023).		Individually, the remaining part of the site (Unit 4) would not be able to accommodate the full amount of employment development proposed for the Six 56 site.

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					31.22ha of this site's land is allocated for employment within St Helens adopted Local Plan (July 2022) and it is agreed through a Duty to Cooperate Agreement, that it is to contribute towards Warrington's employment need. The remaining 44ha is Green Belt and no agreement has been reached between St Helens and Warrington		

ASA ref no.	Site Address	Site Location	Indicative Site area (hectares)	Green Belt	Site Status Updates as at March 2023	Update ASA Assessment Score (March 2023)	Comments on scoring March 2023
					Councils to agree whether this is to meet either St Helen's or Warrington's employment need. St Helens indicate that they will not be able to make a decision on this until the Liverpool City Region Spatial Development Strategy and its supporting evidence base is further advanced.		

Appendix DR06 – Summary of Socio-Economic Benefits Update Report

AMION CONSULTING

Spawforths

Warrington SIX56

Socio-economic Supporting Document

April 2023

LIVERPOOL Winslow House > Rumford Court > 16 Rumford Place > Liverpool L3 9DG
www.amion.co.uk
AMION Consulting is the trading name of AMION Consulting Limited.
Registered Office: Langtons, The Plaza, 100 Old Hall Street, Liverpool L3 9QJ. Company No: 3909897

Contents

1 Introduction

1.1 Project overview

2 Economic context

2.1 Policy context

2.2 Socio-economic baseline

2.3 Ward profiles

2.4 Demand for distribution land and premises

3 Economic Impact Assessment

3.1 Methodology

3.2 Construction phase impacts

3.3 Operational phase impacts

4 Labour market effects

4.1 UK labour market conditions

4.2 Local labour market effects

4.3 Local employment agreement

5 Qualitative economic benefit

6 Conclusion

1 Introduction

This report sets out the results of analyses of the potential socio-economic effects of the proposed Warrington Six56 development. It draws upon the assessment previously reported within the Environmental Statement (ES) submitted in support of the planning application for the proposals.

Warrington Council resolved to grant planning permission in respect of the application. However, the Secretary of State has subsequently decided to call it in for determination and the application will therefore be the subject of an inquiry.

The analysis for the proposals will be outlined at the inquiry, supported by Proofs of Evidence. This report provides an overview of the expected socio-economic effects to inform the Planning Proof of Evidence by Spawforths.

The report summarises and updates the case presented within the ES report. It continues in five sections as follows:

- Section 2 sets out the economic context based on an updated review of alignment with the strategic policy framework, socio-economic conditions within the impact area and wards, a review of socio-economic implications of former colliery sites, and a brief review of the market and demand for logistics accommodation;
- Section 3 provides an overview of the methodology and summarises the results of the impact assessment;
- Section 4 outlines labour market conditions and expected requirements, having regard to local employment arrangements;
- Section 5 provides an overview of other wider socio-economic benefits; and
- Section 6 concludes the report.

1.1 Project overview

The Warrington Six56 project proposes the development of up to 287,909 m^2 (gross internal area) of new logistics (B8 use class) and ancillary office floorspace. The site is strategically positioned on Junction 20 of the M6 and Junction 9 of the M56, located on the south eastern border of Warrington and close to its boundary with neighbouring local authorities of Cheshire East and Cheshire West and Chester.

Through the construction and operation of these facilities, it is envisaged that the project will result in a range of economic effects within a defined area of impact. This report reviews and updates the assessment of gross and net additional employment and Gross Value Added (GVA) impacts arising temporarily from the construction of the new floorspace and the longer-term effects of the scheme when operational.

2 Economic context

2.1 Policy context

The 2019 ES set out a comprehensive review of relevant socio-economic policy at the national, regional, and local levels. The proposed scheme was shown to align strongly with key socio-economic objectives. The policy context was reviewed and updated within the July 2020 Addendum Report. This is summarised and updated (where appropriate) in respect of the identified policy documents as follows:

- **National Planning Policy Framework** – The National Planning Policy Framework (NPPF), set out by the Government and refreshed in 2019, describes the planning policies for England with the primary purpose of contributing to sustainable development. The Proposed Development is consistent with the Government's commitment to economic growth, job creation and prosperity, as outlined within the Framework and the priority of sustainable development, particularly in relation to "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation".
- **Northern Powerhouse Strategy** – published in 2016, the Northern Powerhouse strategy explains how the Government will work with local stakeholders to address key barriers to productivity in the region. The proposed development will contribute to rectifying the economic imbalance in England's regions. By expanding the logistics sector in Warrington, the proposed development will make an important contribution to achieving the aspirations of the NPS. The logistics sector is seen as a key enabler of growth for the North's other sectors (particularly linked to port and airport activity) and, while historically logistics has been associated with relatively low-level skill requirements, the sector has begun to move towards a higher skill business model, providing a routeway towards improved productivity. The logistics sector's economic productivity is projected to grow by 83% between 2013 and 2035.
- **Gateway to the Northern Powerhouse** - The Devolution Growth Deal Bid (DGDB) establishes an ambitious plan of development for the Cheshire and Warrington's sub-region, promoting the regions contribution to the Northern Powerhouse project. The economic ambition for the area is to create a "£50 billion economy, adding £27 billion per annum to our GVA and creating 127,000 new jobs and 139,000 new homes" by 2040. In order to realise these ambitions, the DGDB highlights the regions need to create "excellent transport connectivity" and a "skilled and productive workforce".

The main objectives of the DGDB such as 'increasing business productivity' and 'enabling business growth and investment' interlink with the objectives of the Proposed Development. Efficient supply chains are critical to economic competitiveness and productivity and logistics and transport will continue to be key economic drivers for a number of industries, 'improving the productivity of the supply-chain'.

- **Cheshire and Warrington SEP** - The Cheshire and Warrington Matters (CWM) paper is a strategic economic plan establishing the region's investment proposals to build additional housing and create "12,473 jobs over the next three years". CWM sets out the vision for growth within the area in the hope of creating "an economy of £26.6bn with GVA per head 110% of the UK average" by 2021. By 2030, Cheshire and Warrington sub-region hopes to become "an economy of £35bn with GVA per head 115% of the UK average. Home to an additional 100,000 residents, 75,000 new jobs and 70,000 new homes". The Proposed Development will directly contribute to realising the aims identified in the Cheshire and Warrington Strategic Economic Plan, including 'job creation and economic growth which benefits as many communities as possible'

- **Warrington's Economic Growth & Regeneration Programme (Warrington Means Business) (2017)** – Warrington Means Business (WMB) outlines the Council's significant ambitions for the borough to reinforce 'Warrington as a strong national driver of prosperity'. Acknowledging Warrington's economic success up to this point, WMB cites Warrington's 'skilled people', 'business clustering' and 'connectivity' as key drivers for the region's economic growth. Warrington is 'the largest catchment area in the UK outside of London', sitting at the 'heart of Northern Powerhouse' surrounded by neighbouring economic hubs such as Manchester and Liverpool. Future rail and development proposals such as HS2 and Northern Powerhouse Rail (HS3) will reinforce Warrington's strategic position.

- **Economic development needs study** - The Economic Development Needs Study for Warrington (EDNS) aims to identify future land allocation in the region, pursuing the national planning framework's aim of sustainable economic growth in the region. The assessment outlines the context which shaped the calculation of employment land and floorspace necessary, including the necessary expansion of 'offices, industrial spaces, warehouses and distribution sites' in the region.

  According to the EDNS, the expansion of Warrington's logistics sector 'would require an adjustment to Warrington's Green Belt boundaries' with a need for additional 'industrial and warehouse units of 2,000-5,000 sqm'. A forecast of future employment indicates an expanding logistics sector is likely to strengthen job creation in the area despite automation, translating into job numbers and additional employment floorspace requirements.

Subsequent to the submission of the ES and subsequent Addendum Report, relevant updates in policy and guidance include:

- **Levelling up white paper** – DLUHC published its flagship Levelling Up White Paper in February 2022. This contains detailed plans to improve equality of opportunity and prosperity across the whole of the UK. The White Paper contains a detailed diagnosis of geographical inequalities across the UK and captures these in a framework of six types of capital which interact and reinforce each other to determine the performance of an area: human, financial, social, physical, intangible and institution. Levelling up is ultimately about ensuring each part of the UK is richly endowed in these six capitals.

  The key objectives of levelling up include spreading opportunities and improving public services, and restoring a sense of community, local pride and belonging. Subsequently, education, well-being and pride in place are included as focus areas for the following levelling up missions which the government has announced that, by 2030:

  - the number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas;
  - well-being will have improved in every area of the UK, with the gap between top performing and other areas closing; and
  - pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.

- **Cheshire and Warrington Delivery Plan (2022)** – sets out a vision for Cheshire and Warrington to be the most healthy, sustainable, inclusive and growing economy in the UK, and thereby making levelling up a reality. The strategic recognizes the importance of supporting economic growth and maximizing localized impacts of investment – in terms of generating opportunities for employment and for skills growth.

- **Cheshire and Warrington LEP Local Industrial Strategy (LIS) (2021)** – Cheshire and Warrington LEP have been working to build a robust evidence base to develop its LIS. The priorities of the emerging LIS are to raise productivity, increase business resilience and increase the earning power of residents, where inclusive growth will ensure that all residents and businesses benefit from the sub-region's prosperity. Under the 'place' foundation of productivity, the LEP will build on priorities set out in the SEP to make Cheshire and Warrington a great place to live, work, invest and

visit. The LIS identified the sub-region's core 'super strengths' in energy and clean growth, life sciences, manufacturing, logistics and distribution, and finance and business services.

- **Warrington Draft Local Plan 2021 to 2038 (2021)** – The Plan contains a vision, a range of objectives and an overall strategy for development. The Local Plan will be used to guide decisions on planning applications and to identify areas where investment and growth should be prioritised. A key objective of the Plan is to support Warrington's ongoing economic success by ensuring provision is made to meet the need for employment land between 2021 and 2038.

2.2 Socio-economic baseline

2.2.1 Scope

This section of the report provides an update of the socio-economic baseline contained within the ES and Addendum Report. The baseline analysis focuses on geographical areas relevant to the site, including the Borough of Warrington, and the Cheshire and Warrington LEP, reflecting the location of the site and identified area of impact. Trends of key socio-economic indicators have been analysed compared to those for the Cheshire and Warrington LEP area, the North West and nationally.

The following indicator groups have been updated:

- Employment (economic activity rate and sectoral employment analysis);
- Local labour market (resident employment by occupation, resident earnings, and qualifications;
- Unemployment and worklessness;
- Capacity of social infrastructure (local education and health facilities); and
- Deprivation.

The report updates analysis to cover the period 2020-22 during which the Covid Pandemic and energy crisis impacted on economic activity across the UK. Nationally, the March 2023 Economic Outlook published by the OBR confirms that inflationary pressures and supply side factors - including within the labour market - are expected to continue to impact on economic growth prospects over the short to medium term.

2.2.2 Economic activity and employment

Between October 2021 and September 2022, economic activity rates were higher in Warrington (80.7%), than the LEP (80.2%) and the North West (76.3%) and the national average (78.4%).

Consistent with wider trends, economic activity rates have decreased in Warrington since 2019/20 as workers left the labour market during the pandemic and associated lockdown. Nevertheless, Table 2.1 shows that economic activity rates for Warrington have generally remained above those for Great Britain, the region and LEP areas.

The economic activity rates for Warrington and comparator areas are shown in Table 2.1. The resident based employment rate for Warrington was 78.1% in the period October 2021-September 2022, signalling that around 97% of the economically active population was in employment. This was broadly consistent with wider trends indicates that is relatively limited additional capacity within the local labour market.

Table 2.1: Economic Activity

Economic Activity (% of resident population aged 16-64)	Oct 2018-Sep 2019	Oct 2019-Sep 2020	Oct 2020-Sep 2021	Oct 2021-Sep 2022
Warrington	79.7%	84.8%	81.7%	80.7%
Cheshire and Warrington LEP	81.6%	81.3%	79.6%	80.2%
North West	77.4%	77.4%	77.0%	76.3%
Great Britain	78.9%	79.0%	78.5%	78.4%

Source: ONS annual population survey

In 2021, total workplace employment in Warrington stood at 144,900, representing an increase of approximately 1,900 jobs since 2018. This 7.3% change in total employment from 2018 to 2021 was higher than the change across all comparator areas over the same period (Table 2.2). This growth is in-spite of the impact of the pandemic on economic output over the period 2020-21.

Table 2.2: Employment

Change in total employment (2018-2021)	
Warrington	+9,800 jobs (7.3%)
Cheshire and Warrington LEP	+15,000 jobs (3.0%)
North West	+115,000 jobs (3.4%)
Great Britain	+600,000 jobs (2.0%)

Source: ONS Business Register and Employment Survey

A breakdown of sectoral employment is provided within Table 2.3, showing the absolute levels of employment by broad industry group for Warrington in 2021, together with the proportion of employment in each industrial group for comparator areas in 2021.

Table 2.3: Sectoral employment (2021)					
Breakdown of sectoral employment	**Warrington**	**Warrington (%)**	**Cheshire and Warrington LEP (%)**	**North West (%)**	**Great Britain (%)**
Agriculture, forestry & fishing	400	0.3%	1.7%	1.1%	1.5%
Mining, quarrying & utilities	2,500	1.7%	1.0%	1.0%	1.3%
Manufacturing	6,000	4.1%	7.6%	8.4%	7.4%
Construction	10,000	6.9%	5.5%	5.5%	5.0%
Motor trades	3,000	2.1%	1.9%	1.6%	1.7%
Wholesale	6,000	4.1%	3.6%	3.7%	3.5%
Retail	10,000	6.9%	9.0%	9.2%	9.2%
Transport & storage (inc postal)	12,000	8.3%	5.9%	5.4%	5.1%
Accommodation & food services	8,000	5.5%	7.5%	7.8%	7.5%
Information & communication	4,500	3.1%	3.1%	2.8%	4.3%
Financial & insurance	2,250	1.6%	5.7%	3.4%	3.5%
Property	2,250	1.6%	1.9%	2.1%	1.9%
Professional, scientific & technical	24,000	16.6%	11.7%	8.8%	8.9%
Business administration & support services	21,000	14.5%	9.4%	8.2%	8.7%
Public administration & defence	5,000	3.5%	2.9%	4.8%	4.5%
Education	7,000	4.8%	6.1%	7.7%	8.5%
Health	17,000	11.7%	11.9%	14.8%	13.3%
Arts, entertainment, recreation & other services	4,000	2.8%	3.6%	3.7%	4.3%
TOTAL	144,900	100.0%	100.0%	100.0%	100.0%

Source: ONS BRES

Consistent with the previous baseline report, in 2021 the highest proportions of employment in Warrington were in the business administration and support services, Professional, Scientific, and Technical sector, Business administration & support services and Health sectors. The proportion of total employment in the Transport & Storage (inc. postal) sector was also significant (8.3%) and higher than in all other comparator areas as was the case in 2018.

Overall job density in Warrington (as measured by the ratio of total jobs to resident population aged 16-64) was 1.17 in 2021. This represents a relatively high level of job density, with the figures for the LEP (0.96), North West (0.84) and Great Britain (0.85) all being significantly lower. This confirms the status of Warrington as an important focus for employment within the Cheshire and Warrington LEP and across a wider catchment along the M56 and M62 motorways.

2.2.3 Local labour market

(i) Occupations

The proportion of resident employment by occupation between October 2021 and September 2022 is set out in Table 2.4 for Warrington and comparator areas.

Table 2.4: Occupational profile (% of residents in employment, Oct 21 – Sep 22)

	Warrington	Cheshire and Warrington LEP	North West	Great Britain
Managers, directors, and senior officials	8.1%	11.6%	9.5%	10.5%
Professional occupations	27.2%	25.9%	24.6%	26.0%
Associate prof & tech occupations	12.9%	14.4%	15.0%	14.9%
Administrative and secretarial	8.9%	10.6%	10.9%	10.1%
Skilled trades occupations	6.8%	7.8%	8.0%	8.6%
Caring, leisure, other service	9.2%	8.5%	8.2%	8.0%
Sales and customer service occupations	8.0%	6.0%	7.3%	6.5%
Process, plant, and machine operatives	6.1%	6.9%	6.1%	5.5%
Elementary occupations	12.5%	7.9%	9.9%	9.5%

Source: ONS annual population survey

Warrington has a lower proportion of all residents in employment who were managers, directors, or senior officials than the LEP, regional or national figures. In addition, at the opposite end of the occupational data, a greater proportion of Warrington residents work in elementary occupations.

(ii) Earnings

From 2020 to 2022, resident earnings in Warrington increased by 12.3%, whilst there was an increase of approximately 7.5% across the LEP area, whilst the North West increased

by around 8.2%, an increase of 9.3% was seen across Great Britain.[1] As of 2022, median resident earnings were marginally higher in Warrington than the national average, but more significantly higher than the regional average (7.3%). This may be indicative of high labour demand within the local area.

Table 2.5: Median resident earnings (£ per week)

	2020	2021	2022	Change 2020-2022 (%)
Warrington	558.8	617.1	617.1	12.3%
Cheshire and Warrington LEP	601.2	617.9	617.9	7.5%
North West	558.1	575.2	575.2	8.2%
Great Britain	587.4	612.2	612.2	9.3%

Source: ONS annual survey of hours and earning – resident analysis

(iii) Qualifications

From January-December 2021, the proportion of 16–64-year old's with an NVQ4+ qualification in Warrington (41.6%) was slightly below the average for the wider Cheshire and Warrington LEP area and Great Britain as a whole. At the other end of the scale, Warrington had the lowest of all comparator areas with individuals aged 16-64 who held no qualifications. A relatively high proportion of residents aged 16-64 are qualified up to NVQ2 level.

Table 2.6: Qualification level (% of resident population aged 16-64, 2021)

	NVQ4+	NVQ3	NVQ2	NVQ1	Other quals.	No quals.
Warrington	41.6%	61.0%	82.4%	90.7%	4.7%	4.6%
Cheshire and Warrington LEP	43.9%	62.3%	82.1%	90.6%	4.3%	5.1%
North West	38.6%	58.2%	77.2%	87.2%	5.2%	7.5%
Great Britain	43.6%	61.5%	78.1%	87.5%	5.9%	6.6%

Source: ONS annual population survey

2.2.4 Unemployment

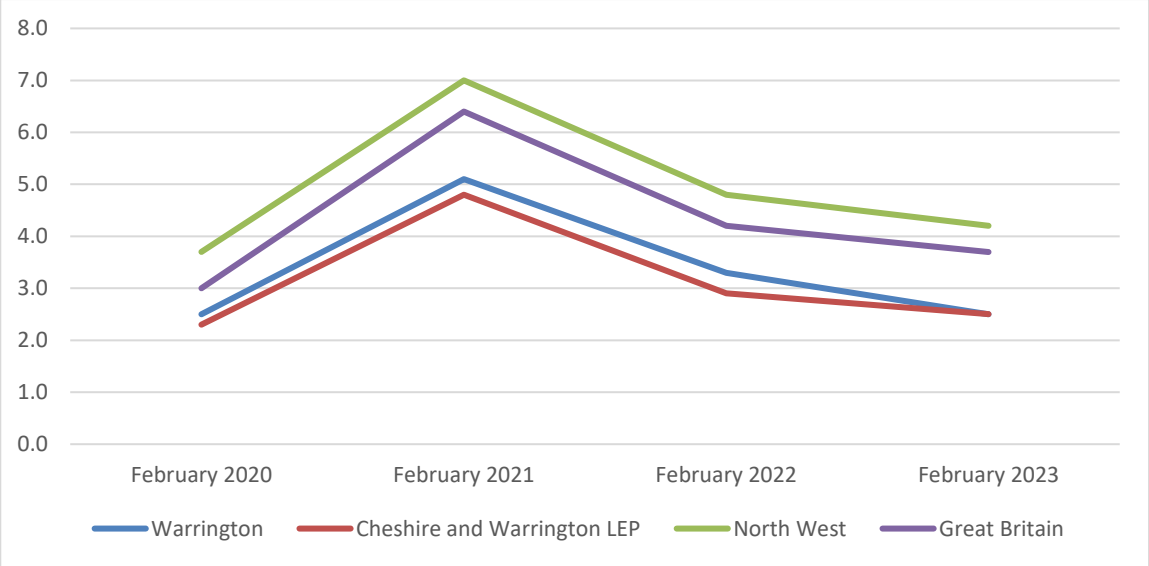
As of February 2023, the claimant count for Warrington was 3,370 persons, as measured by combining the number of people claiming Job Seeker's Allowance (JSA) and National Insurance credits with the number of people receiving Universal Credit principally for the reason of being unemployed. This represented 2.5% of the resident population aged 16-

[1] ONS (2020) 'Annual Survey of Hours and Earnings – resident analysis', Median weekly pay (gross), full time workers

64, which is consistent with the average for the LEP area and below regional and national averages.

Following the onset of the COVID-19 pandemic in March 2020, there was a significant increase in the number of claimants across the country. This is evidenced in Figure 2.1, showing a sharp increase across all comparators in between February 2020 and 2021. As restrictions have lifted, there has been a reduction in the claimant rate back to the levels recorded in 2019 prior to the pandemic.

Figure 2.1: Claimant count unemployment



Source: ONS Claimant Count (2020)

The unemployment claimant rate in February of each of the last four years is set out in Table 2.7 for each of the comparator areas.

Table 2.7: Unemployment - Claimant rate (% of resident population aged 16-64)

	February 2020	February 2021	February 2022	February 2023
Warrington	2.5%	5.1%	3.3%	2.5%
Cheshire and Warrington LEP	2.3%	4.8%	2.9%	2.5%
North West	3.7%	7.0%	4.8%	4.2%
Great Britain	3.0%	6.4%	4.2%	3.7%

Source: ONS claimant count

2.2.5 Deprivation

The Index of Multiple Deprivation (IMD) 2019 includes seven distinct domains of deprivation which are combined and weighted. The 2019 update replaced the IMD 2015,

and separate rankings have been produced for local authorities and Local Enterprise Partnership (LEP) areas. Out of the 317 local authorities across England, Warrington was ranked the 175th most deprived local authority in the country. Cheshire and Warrington is ranked as the 30th most deprived LEP area in England (out of 38).

Wider trends mask the presence of significant clusters of deprivation, focused particularly around the town of Warrington including suburbs to the south of the town centre – for example around Latchford – which includes LSOA areas ranked amongst the 10% most deprived nationally. This reflects evidence of deprivation across the income, employment, health and skills domains.

A map showing deprivation within Warrington is attached at Appendix A.

2.3 Ward profiles

A Ward profile has been prepared for Warrington (plan attached at Appendix B). Data has been collected from the following sources:

- 2021 Census;
- ONS Business Register and Employment Survey; and
- ONS Claimant Count.

Table 2.9 sets out the socio-economic profiles for each ward and the local authority averages. The Warrington Six56 site is predominantly located within the Grappenhall ward adjacent to the boundary with Cheshire East and to the south of the town of Warrington. Based on data from the above sources, the Grappenhall Ward has a job employment density, reflecting the presence of established employment locations along the M56. A high proportion of the resident population is qualified to NVQ4 (45.6%) and while the economic activity rate is low (58.8%), this reflects the relatively high proportion of retired residents as levels of unemployment (based on 2021 Census data and 2023 claimant data) are below the average for the local authority.

The wards which are adjacent to the Warrington Six56 site are Appleton, Lymm North and Thelwall and Lymm South. The profile of these wards is similar to that for Grappenhall, as illustrated in Table 2.9. Overall, data for the wards to the south of Warrington generally suggests the existing communities are relatively prosperous, consistent with data from the Index of Multiple Deprivation (2019, See Appendix A).

The analysis indicates that areas within Warrington Town have a different profile. Latchford East and Latchford West to the south of the town centre have a relatively low job density, with higher a higher proportion of residents identified as unemployed and generally lower qualification levels. Unemployment is particularly high in Bewsey and Whitecross (in-spite of the significant number of jobs based in this area), Poplars & Hulme and Orford.

	Population aged 16+	Employment	Job density	Claimant rate	Economic activity		Qualifications	
	(2021 Census)	(BRES, 2021)	(2021)	(Feb 2023)	Economic activity rate (2021)	Unemployment rate (2021)	Qualified to NVQ4 (2021)	No qualifications (2021)
Appleton (Warrington)	8,780	2,500	0.28	0.6%	55.9%	2.5%	48.4%	10.8%
Bewsey and Whitecross	9,684	42,000	4.34	5.0%	66.2%	5.7%	28.3%	21.5%
Birchwood (Warrington)	8,788	23,000	2.62	2.2%	58.9%	4.9%	30.6%	16.5%
Burtonwood and Winwick	5,242	5,000	0.95	1.3%	54.9%	3.5%	31.0%	18.4%
Chapelford and Old Hall	9,377	2,000	0.21	1.1%	68.3%	3.0%	41.4%	10.6%
Culcheth, Glazebury and Croft	9,924	5,000	0.50	1.1%	52.9%	3.9%	38.9%	14.5%
Fairfield and Howley	9,575	3,500	0.37	3.7%	65.1%	5.4%	25.2%	20.6%
Grappenhall	5,714	5,000	0.88	0.7%	58.8%	3.6%	45.6%	9.9%
Great Sankey North and Whittle Hall	8,326	9,000	1.08	0.9%	64.4%	2.6%	39.0%	11.4%
Great Sankey South	9,149	1,500	0.16	1.8%	63.9%	3.7%	26.8%	17.5%
Latchford East	7,069	1,750	0.25	3.4%	65.5%	4.7%	24.7%	20.5%
Latchford West	6,470	5,000	0.77	2.4%	60.2%	4.1%	27.6%	19.1%
Lymm North and Thelwall	9,531	2,000	0.21	0.9%	59.6%	2.6%	42.6%	12.1%
Lymm South	5,134	2,500	0.49	1.1%	57.6%	3.0%	50.9%	10.3%
Orford	9,679	4,500	0.46	3.4%	61.1%	5.2%	19.5%	25.0%
Penketh and Cuerdley	8,434	2,500	0.30	0.8%	55.7%	2.8%	30.1%	17.3%
Poplars and Hulme	9,576	3,500	0.37	4.1%	60.3%	5.9%	18.9%	24.7%
Poulton North	8,139	4,500	0.55	1.5%	56.3%	4.6%	28.8%	17.3%
Poulton South	5,364	1,250	0.23	1.4%	61.0%	2.9%	27.2%	17.0%
Rixton and Woolston	7,775	8,000	1.03	1.2%	58.1%	2.9%	29.6%	16.9%
Stockton Heath	5,628	2,250	0.40	0.8%	62.0%	2.4%	46.2%	10.4%
Westbrook (Warrington)	5,363	8,000	1.49	0.7%	64.2%	2.2%	37.9%	12.5%

2.4 Demand for distribution land and premises

The overview outlined below draws key points of relevance from market advice prepared by JLL (March 2023) on behalf of Langtree Property Partners LLP. Points of importance to assessing the socio-economic impact of the scheme are outlined below.

As a result of Covid 19 and Brexit there has been a change in shopping habits, increased inventory and reshoring of business. This has resulted in the logistics/warehousing sector expanding its property footprint creating demand for larger buildings with good access to the strategic road network.

Changing logistics requirements are driving a need for larger, taller distribution units to enable automation. The size and height of the buildings is determined by the automation system. There is also increasing demand for more sustainable buildings as occupiers more towards net zero operation.

The proposed Six56 site is located in an established location for distribution activities on the M6 corridor. This includes DPD, Eddie Stobbart and Kammac at the Apple Thorn Trading Estate. The M6 Corridor forms a core part of the wider North West market area for the distribution sector extending from Crewe to Preston, along the M62 between Liverpool and Manchester, and around the M60 motorway.

Over 652,462 sq. m of predominantly logistics floorspace has been developed in the Greater Warrington submarket area since 2012 mainly at Omega. M6 Major/Florida Farm and Omega are both located within the core M6 market area the level of take up confirms the attractiveness of the location to the market. Key demand factors for new sites include land availability for large footprints, access and deliverability.

Regional take up for 2022 was 573,907 sq m – double the ten year average of 284,844 sq m. There are twenty seven enquiries for units of 27,870 sq. m or over. The wider Warrington/M6 market is a strong location. The area has the largest take up in the last five years at 411,938 sq m or 63% of the take up, with JLL confirming that regional and local demand are also strong. There are currently 36 enquiries with a specified search area of the wider Warrington area. Some 800,000 sqm of requirements are focused on the Greater Warrington area, while 2,834,312 sqm of sub-regional and regional requirements will consider the market area. This confirms the demand within the market area that Six 56 is located.

JLL has advised that the current supply of Grade A buildings in the North West is 315,879 sq. m in 17 units. This represents around 12 months' supply based on the five and ten-year average take up – confirming an imbalance between existing supply and demand.

The advice from JLL indicates that there is a shortage of deliverable sites in the North West and specifically in the Warrington area. There are significant barriers to the delivery of regional sites in the locale. The delivery of distribution space at the Fiddlers Ferry site to meet employment need in the short term is identified as challenging due to long lead

in times associated with decommissioning, remediation, the phased nature of the proposals and the location of the site - which does not have the same locational benefits and direct access to the motorway that Omega and Six56 have. Overall, JLL has advised that the number of sites capable of meeting modern requirements is now very limited, with the majority of sites cluster around Greater Manchester and Central Lancashire.

3 Economic Impact Assessment

3.1 Methodology

The assessment of socio-economic impacts has been undertaken using the following approach:

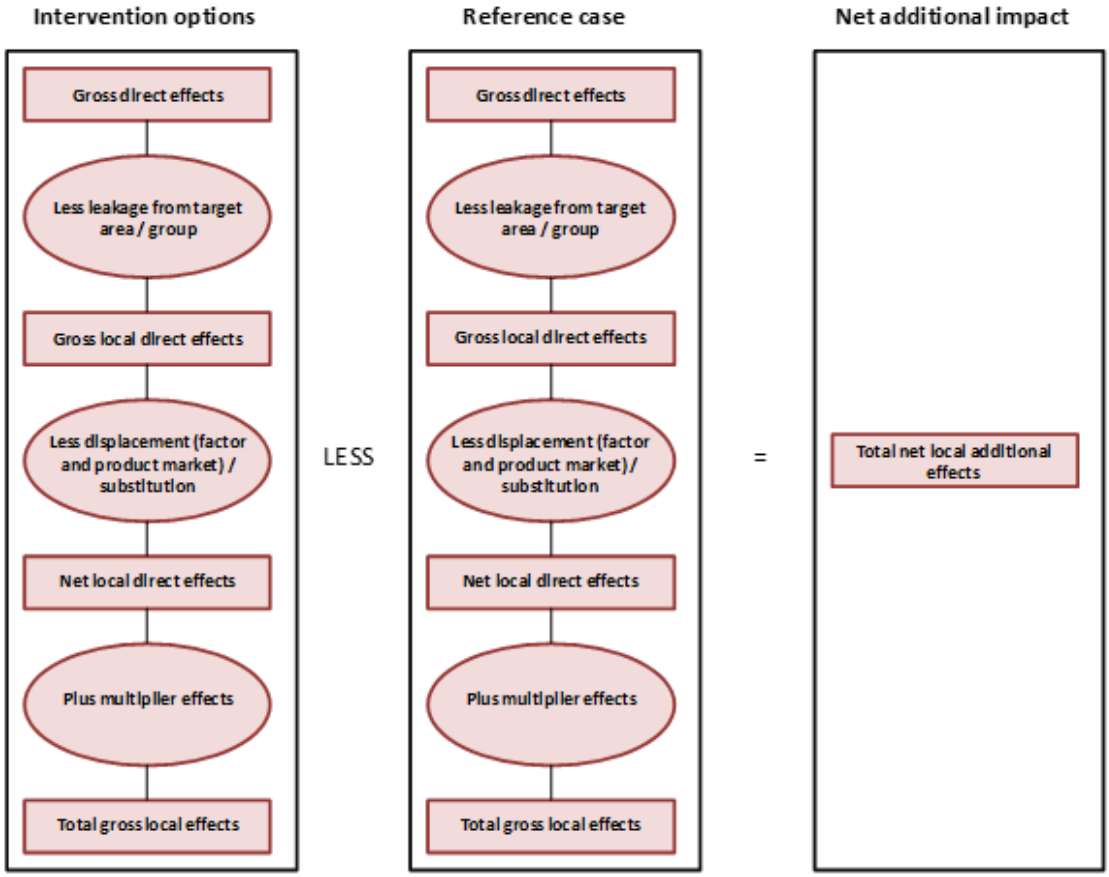
- a review of the strategic policy context to provide an outline of the relevant national, sub-national and local social and economic objectives relevant to the local and wider areas of impact;
- identification of the impact area, in relation to each potential socio-economic impact for the assessment of the Proposed Development, taking into account the potential scale of activity within the existing market having regard to updated analysis carried out by JLL and summarised in Section 2.4;
- a desktop review of publicly available information on current socio-economic and labour market conditions in Warrington and the wider LEP sub-region to establish the baseline using accepted Government sources, such as the Census and ONS data; and
- assessment of likely significant socio-economic effects (jobs and Gross Value Added – GVA) of the proposed Six56 development during the construction and operational phases based on the development of an economic impact model.

The assessment has also had regard to an assessment of employment land need for Warrington over the local plan period prepared by Iceni Projects Limited. Assumptions have been reviewed and revised where appropriate to reflect updated conditions and supplementary information.

Qualitative and quantitative assessments have been undertaken using assessment methodologies from published guidance, including the HCA's Additionality Guide (3rd Edition, 2014) and Employment Densities Guide (3rd Edition, 2015). In addition, regard has been had to 'Guidance for using additionality benchmarks in appraisal' published by the former Department for Business Innovation & Skills (BIS). Guidance has been applied with appropriate professional judgement, informed by a review of wider research findings and literature relating to employment and labour market characteristics for the Transport and Distribution sector. The approach adopted has been broadly consistent with assessments for comparable projects in the North West of England (Parkside Phase 1 and Parkside Link Road) which have been tested at public inquiry.

Key to understating the socio-economic effects of the proposed development involves determining its net additional impact or 'additionality'. This is the extent to which activity takes place at all, on a larger scale, earlier or within a specific designated area or target group as a result of the intervention. The approach to assessing the net additional impact of a project is shown diagrammatically in Figure 3.1.

Figure 3.1: Approach to calculating net additional impact



In order to assess the additionality of the proposed Six56 development, the following factors were considered:

- Leakage – the proportion of outputs that benefit those outside of the area of impact.
- Displacement – the proportion of outputs accounted for by reduced outputs elsewhere in the area of impact. Displacement may occur in both the factor and product markets.
- Multiplier effects – further economic activity associated with additional local income and local supplier purchases.
- Deadweight – outputs which would have occurred without the Proposed Development. This is referred to as the reference case.

A summary of additionality adjustments applied in the assessment of construction and operational phase impacts is outlined in Table 3.1. Adjustments for displacement in the operational phase have been reviewed in light of updated evidence outlined within the Proof of Evidence prepared by Iceni Projects Ltd. Displacement has been adjusted to 50% at the Warrington level and 60% at the Cheshire and Warrington level (from 25% and 35% respectively within the ES Addendum report). This is based on Valuation Office Agency

data for land uptake in Warrington for the period 2011-19. In light of the property market analysis which identifies a very high level of regional demand for distribution premises within the Warrington sub-market, the updated displacement adjustments are considered to support a prudent assessment of net additional employment and the net additional impact could be considerably higher.

Table 3.1: Additionality ratios

	Warrington	Cheshire & Warrington LEP	Assumptions
Construction phase			
Leakage	60%	50%	Census 2011 commuting data for Warrington and wider LEP area adjusted to allow for contractor resourcing
Displacement	20%	30%	Limited displacement allowing for phasing of delivery over 6.5 years
Multiplier effects	1.25	1.46	Additionality benchmarks (BIS) for capital projects reflecting targets for maximizing supply chain impacts
Deadweight	0%	0%	No development assumed under counterfactual scenario
Operational phase			
Leakage	50%	40%	Census 2011 commuting data for Warrington and wider LEP area
Displacement	50%	60%	Updated benchmarks reflecting VOA data as outlined in Proof of Evidence presented by Iceni Projects Ltd (2023)
Multiplier effects	1.29	1.46	Local benchmark for B2/B8 in HCA Additionality Guide (2014) and sub-regional benchmark for capital projects in BIS guidance (2009)
Deadweight	0%	0%	No development assumed under counterfactual scenario

3.2 Construction phase impacts

The socio-economic assessment has considered the following potential impacts during the Construction Phase:

- temporary employment generated as a result of the construction works – this includes direct employment associated with site remediation and redevelopment, as well as indirect and induced employment (multiplier effects) from supply chain

expenditure and the expenditure in the local economy of workers employed during the Construction Phase;

- short-term increase in economic output (GVA) – in line with the temporary employment impact, again this takes account of the direct, indirect and induced economic output impact during the Construction Phase; and
- creation of training and apprenticeship opportunities during the Construction Phase.

An overview of the expected temporary employment and GVA output effects in the construction phase are set out in Table 3.2. Estimates of temporary construction employment set out within the ES Addendum report were based on employment coefficients outlined in Cost per Job Guidance published by the former HCA. This guidance is no longer available and as such, a revised basis for the assessment has been applied. The updated assessment is based on construction sector benchmarks for turnover and GVA per job supported derived from the ONS Annual Business Survey 2020.

Table 3.2: Construction phase employment and GVA

	Warrington	Cheshire and Warrington LEP
Gross temporary jobs (average annual jobs over the construction period)		
- Direct	183	183
- Direct, indirect and induced	46	84
Net additional temporary jobs (average annual jobs over the construction period)	73	93
Net additional GVA (£m)	£81.75	£83.55
Net additional GVA (£m per annum over construction period)	£12.58	£12.85

The employment and GVA benefits have been assessed as a minor positive impact at the Warrington and wider impact area level.

Based on accepted multipliers, it is estimate that investment in the construction phase will potentially support in the order of 180 apprenticeship trainees over the 6.5 year construction period. Within the context of overall apprenticeship numbers, this is assessed as being a minor positive impact.

3.3 Operational phase impacts

The socio-economic assessment has considered the following potential impacts during the Operational Phase:

- creation of direct, indirect and induced long-term employment opportunities from the proposed B8 uses on the proposed development;
- long-term increase in economic output (GVA) resulting from the direct, indirect and induced impacts of the Proposed Development during the Operational Phase;
- increase in business rate revenue generated due to the provision of new B8 floorspace on the Application Site;
- creation of training and apprenticeship opportunities during the Operational Phase; and
- commuting and migration impacts resulting from the creation of long-term employment opportunities.

The effects on the local labour market are considered in Section 4 below and the wider economic benefits in Section 5.

The estimate of gross employment set out in the ES Addendum report is based on an employment density of 70 m^2 per full time equivalent (FTE) job, having regard to benchmarks for storage and distribution activities (HCA guidance). While at the lower end of the range, the ES Addendum report notes that the published guidance recognizes that "as logistics becomes more specialised both a greater number of employees and range of skills are required to operate a modern distribution facility" (HCA, p.22). In addition, there is a high level of variability across the sector, including in relation to the treatment of drivers as direct employees linked to premises.

The ES Addendum report is also supported by evidence presented for established projects:

- According to Warrington & Co., since 2013 the development build-out and consented to date at Omega is some 358,747 m^2, while the number of permanent secured jobs is 7,785. These estimates were subsequently refined, suggesting that 7,150 jobs have been created across almost 400,000 m^2. Allowing for an adjustment of 90% (to account for some part-time working), this would equate to an overall employment density of 61 m^2 per FTE;
- The British Property Federation's (BPF's) 2015 study on the economic impact of the UK logistics sector also points towards increasing employment densities within logistics floorspace, highlighting examples of schemes which support densities of 48 m^2 (a logistics facility) and 34 m^2 (supermarket distribution centre) per FTE job.

Based on an updated review of employment density for distribution facilities in the UK, further benchmarks have been identified which are outlined in Table 3.3. It is noted that the level of detail provided in respect of these benchmarks is limited making direct comparison difficult.

Table 3.3: Employment Density evidence for distribution facilities in the UK			
Type of property	**Source**	**Year**	**Value (sqm per job)**
'Final mile' distribution	HCA Employment Density Guide 2015	2015	70
Regional distribution	HCA Employment Density Guide 2015	2015	77
National distribution	HCA Employment Density Guide 2015	2015	95
Logistics facilities	Prologis	2019	80-120
Warehouses	UK Warehousing Association	2023	125-150
Fulfilment centre	2020 Amazon Data	2020	117
Distribution centre	Ocado Annual Report 2019	2019	65
Distribution centre	Tesco Annual Report 2021	2021	85-100
Distribution centre	DHL Annual Report 2020	2020	150-200
Logistics facilities	XPO Logistics 2020 Sustainability Report	2020	120
Distribution centre	JLP Annual Report and Accounts 2021	2021	80-120
Logistics facilities	Wincanton Annual Report Accounts 2021	2021	90-110

As presented in the addendum report, further analysis suggests that levels of employment, and the nature of the jobs created, will be subject to a range of pressures as the take-up of new technologies by the logistics sector accelerates. This has been informed by a macroeconomic review of automation and implications for employment, alongside evidence relating to the potential scale of employment displacement at the microeconomic level.

Consideration has been given to the impact of increased automation on levels of future employment. This has been based on a review of research that reflects both empirical work looking at recent overall employment trends relating to automation and 'foresight' analyses examining the potential impact of automation (Appendix C). Both strands point to the likelihood of sustained automation penetration across the economy, and for the transportation, storage and logistics sectors to be at the forefront of any associated displacement. However, broader sector-related evidence suggests that logistics companies have approached the issue of automation with caution and may not transition fully to emergent technologies for a decade or more.

Noting evidence that, to date, logistics companies have approached the issue of automation with caution, 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. On this basis, it is reasonable to assume that logistics will remain an important driver of employment over the next ten years and beyond.

Evidence suggests that the occupations with the highest estimated automation potential are those requiring basic skills. On this basis, higher skilled activities are likely to be largely

retained. The adoption of increased automation over coming years may create pathways to higher value roles for established and new employees.[2]

It would be expected that employment displacement at the local level would in part be offset by income effects (reduced production costs which are passed on to consumers through lower prices, leading to an increase in spending power). Studies have suggested that this could potentially offset the effect of losses associated with employment displacement to a factor of around 50%.

The ES Addendum report estimated that the proposed development would support 4,113 gross direct FTE jobs, resulting in a net additional employment impact of 1,990 FTE jobs at the Warrington level and 2,342 FTE jobs at the Cheshire and Warrington LEP level. As this exceeded a net increase of 1,000 FTE jobs at the LEP level, it was assessed within the ES Addendum report as of a substantial positive magnitude. Based on the identified employment effects, the net additional GVA impact was estimated at £216 million and £210 million respectively at the Warrington and Cheshire and Warrington LEP levels.

The assessment of gross employment effects outlined in the ES Addendum report has been reviewed in light of the comparator evidence outlined above, alongside the review of potential effects associated with the adoption of new technologies and automation. While recognizing that levels of activity – both in terms of job numbers and labour market requirements - are highly variable, it is considered that this estimate is at the upper end of the range for gross direct employment. On this basis, further analysis has been carried out to inform an appraisal of the potential employment effects.

Based on evidence outlined in Table 3.3, a density of around 80 sq m (GEA) per FTE employee (broadly consistent with benchmarks for regional distribution centres published within the HCA employment density guide alongside other published sources) is considered to be consistent with expected demand for units proposed at Six56 based on the market advice prepared by JLL.

A further scenario has been assessed to provide an estimate of potential employment and economic output allowing for increased automation in the logistics sector over a ten year period. Consistent with the forecasts outlined above, allowance under this lower range scenario has been made for a 15% reduction in staffing levels across the proposed development. Allowance has been made for this to be offset by an increase in productivity (based on GVA per FTE employee benchmarks) in the appraisal of economic output.

Table 3.4 outlines the result of the analysis of each scenario at the Warrington and LEP levels, allowing for revised additionality ratios based on updated evidence. The updated assessment of operational effects confirms that net additional employment impacts at the Cheshire and Warrington level will be of a substantial positive magnitude under each

[2] Price Waterhouse Coopers (PwC) (2018), Will robots really steal our jobs? An international analysis of the potential long term impact of automation

of the scenarios. The net economic output effects (based on the estimate of net additional GVA per annum) are also expected to be of a substantial positive magnitude.

Table 3.4: Operational phase employment and GVA

	ES Chapter	Reduced density80 sqm per FTE job	Reduced density and 15% automation adjustment
Warrington Level			
Gross operational jobs (FTE)			
- Direct	4,113	3,599	3,129
- Direct, indirect and induced	5,306	4,643	4,037
Net additional jobs	1,326	1,161	1,009
Net additional GVA per annum (£m)	£149.0	£130.4	£130.4
Cheshire & Warrington LEP Level			
Gross operational jobs (FTE)			
- Direct	4,113	3,599	3,129
- Direct, indirect and induced	6,005	5,254	4,569
Net additional jobs	1,441	1,261	1,097
Net additional GVA per annum (£m)	£134.9	£118.0	£118.0

Further analysis has been undertaken to demonstrate the sensitivity of employment and GVA estimates to changes in key assumptions relating to employment density and displacement. As outlined below, allowing for increased levels of displacement to 65%, the net additional employment impacts under the reduced density case remain of a substantial positive magnitude.

	ES Chapter	Reduced Density	Reduced Density and 15% automation adjustment
Displacement	**70 sqm / FTE**	**80 sqm / FTE**	**92 sqm / FTE**
Net additional employment (FTE)			
35%	2,342	2,049	1,782
60%	1,441	1,261	1,097
65%	1,261	1,103	959
Net additional GVA (£ million p.a.)			
35%	£219.19	£191.79	£191.79
60%	£134.88	£118.02	£118.02
65%	£118.02	£103.27	£103.27

In addition to the employment and GVA impacts, other positive impacts are expected to arise from:

- Increased business rate revenue – estimated at £7.1 million per annum once fully developed, representing a substantial positive benefit. It is noted that based on the latest valuation, the level of business rates income could be significantly higher (in the order of 25%);
- Training and apprenticeship opportunities – the potential to align operations with sector focused skills provision to ensure that local opportunities are maximised is considered an impact of minor positive magnitude;
- Labour market benefits – there will be significant opportunities for local residents to benefit from new highly paid employment opportunities. National statistics show that mean earnings for workers in Warehousing and Support Activities for Transportation (SIC 52) are £37,962 per annum, above the all-sector average of £33,402. The sector offers a range of roles including highly-skilled and more basic employment opportunities. The scheme promoters are committed to implementing a transport strategy that enables the workforce to gain sustainable and affordable access to employment.

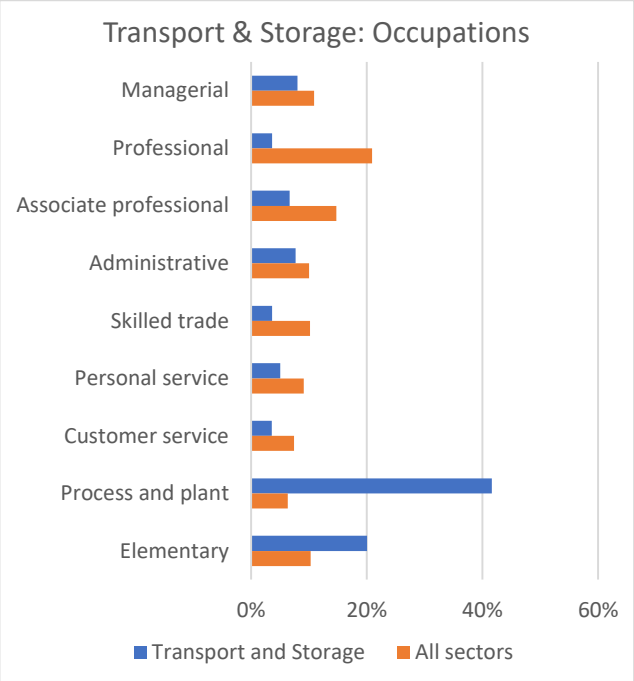
4 Labour market effects

4.1 UK labour market conditions

As noted above, a range of opportunities will be created, including more elementary roles that will be accessible to those with lower level or no formal qualifications and those who are looking to re-enter the labour market.

Based on data from the ONS Business Register and Employment Survey, 1.59 million individuals were employed in the Transport and Storage Sector in 2021, amounting to 5% of total employment in Great Britain. Total sector employment has increased by around 4% since 2015, broadly consistent with the all sector average.

Data from the ONS Annual Population Survey (2019) confirms that the Transport and Storage sector remains dominated by 'process, plant and machine operative' and elementary' roles (accounting for 62% of jobs).[3] 'Transport and drivers and operatives' account for almost all of the 'process, plant and machine operative' occupations, amounting to more than 40% of the sector workforce (compared to 6% for all sectors). It is envisaged that elementary roles relate mainly to warehousing activities.



The greatest proportion of logistics jobs are level 2, which is low to middle-skilled (41.8%), followed by low-skilled (26.1%). The proportion of logistics jobs considered to be low and low-middle skilled is greater than the national average, where they represent only 9.4% and 32.4% respectively of all jobs in the economy. Level 2 qualifications are a requirement for HGV drivers and other machine operatives within the sector.

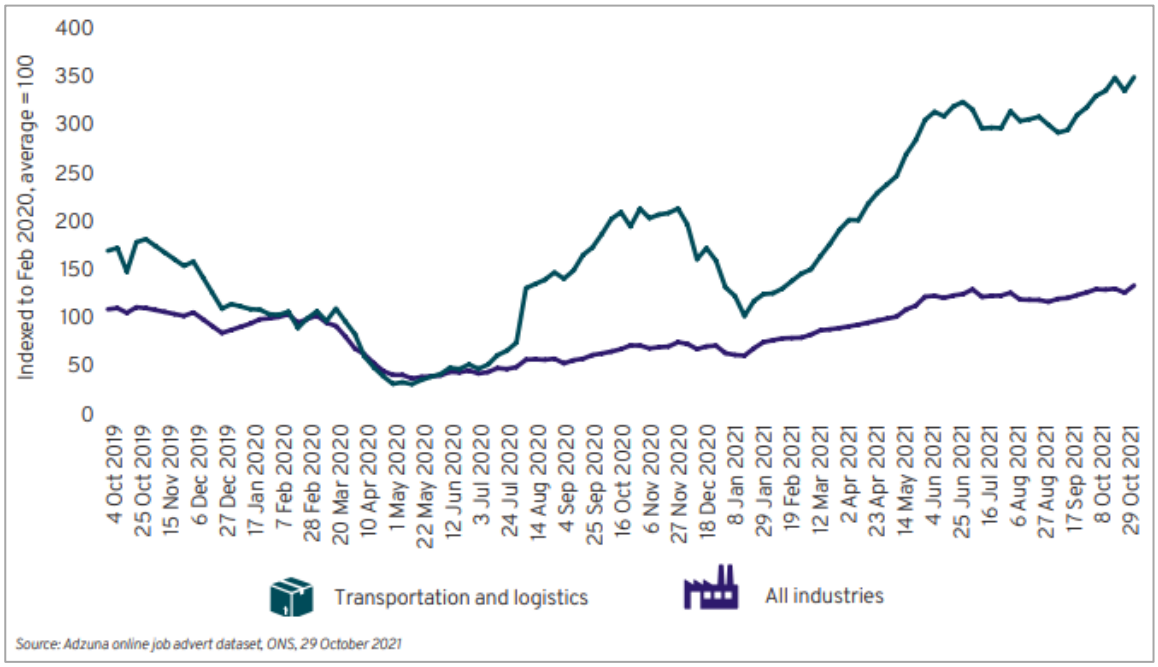
According to a UKCES Employer Skills Survey, in 2014 only 18% of logistics employers had recruited an individual to their first job after they had left education, which is lower than the 24% average for the rest of the UK. Overall, only 9% of the workforce in the UK logistics sector is under 25. Additionally, 14% of logistics employers in the UK reported

[3] https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/adhocs/10663occupationatuklevelbysectorindustryageandethnicity

skills gaps within their workforce in 2013, meaning their employee was not able to do their job to the required level. Nonetheless, a majority of logistics employers surveyed within the UKCES either funded or arranged training for their staff (62%). The 2021 Skills and Employment Report published by Logistics UK[4] reports that skills gaps represent a significant issue for operators within the sector, with businesses investing to train staff to an appropriate level of qualification – albeit, only 37% of logistics companies indicated they would hire apprentices. Nevertheless, it is envisaged that businesses locating at Six56 would have capacity to provide further training, particularly in light of labour market constraints.

The Logistics UK Skills and Employment Report (2021) confirms that acute shortages of HGV drivers, alongside difficulties filling other roles, remain a major concern at the UK level. Brexit and the Covid pandemic are identified as playing a significant role in creating the conditions for skills shortages and vacancies, with 1.2 million unfilled job vacancies identified in the period August to October 2021 – the highest level since records began.

Figure 4.2: Transport and logistics vacancies compared with all UK industries



Shortages are particularly acute for HGV drivers, with significant losses from the profession in the UK as EU nationals left the UK following the Brexit vote. In addition, HGV drivers have a significantly older age profile than the general population – indicating the current challenges may worsen over coming years if the issue is not addressed. Shortages are also severe in other areas including warehousing, particularly for lower paid, lower skilled jobs. This factor is driving demand for greater automation. Labour market constraints are an issue across all areas of the sector, including both skills and lower skills

[4] https://logistics.org.uk/CMSPages/GetFile.aspx?guid=24a6a7cd-351e-471b-bc7a-8550a8264537&lang=en-GB

occupations. It is reported that between 63%-76% of employers experience recruitment difficulties associated with a lack of suitably qualified candidates.

4.2 Local labour market effects

It is estimated that premises delivered at Six56 could support between 2,576 and 4,113 gross FTE jobs. Leakage has been estimated at 50% based on 2011 Census commuting data, while allowance is made for total employment based on a mix of full and part time roles based on ONS data for the Transport and Storage sector. On this basis, the local labour requirement is expected to range from 1,407 to 2,247 jobs.

Based on the labour market profile outlined above, many of the jobs created would be accessible to new entrants to the labour market and 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 will be at NVQ level 2 or lower, relating to 'process, plant and machine operative' and 'elementary occupations'. Based on published data for occupations sought by claimants of Jobseeker's Allowance (February 2023), around 55% of claimants at the UK level seek elementary occupations. On this basis, it is reasonable to assume that employment opportunities and labour market impacts would be significant for these groups.

A spatial analysis of employment effects within the local (Warrington) labour market has been undertaken, having regard to the level of available capacity (claimant count) alongside an analysis of existing employment trends at the local level. The data is summarized in Table 4.1.

More than 50% of Warrington residents claiming out-of-work benefits currently reside in five wards: Bewsey and Whitecross; Fairfield and Howley; Orford; Poplars and Hulme and Latchford East. Based on February 2023 data, there were 1,800 residents claiming out-of-work benefits in these wards. Subject to securing appropriate transport provision, it is estimate that around 50% of the local labour requirement will be met by workers residing in these areas.

Based on data from the 2021 Census, these wards (Bewsey and Whitecross; Fairfield and Howley; Orford; Poplars and Hulme and Latchford East) also have the highest percentage of resident employees working in the Transport and Storage sector and the highest proportion engaged in 'process, plant and machine operative' and 'elementary occupations'.

Based on data from the 2021 Census, there are high levels of household deprivation within the identified wards. In each area, more than 50% of households demonstrated at least one characteristic of household deprivation and the highest average number of characteristics of all wards within Warrington. This suggest that the labour market impacts of the Six56 scheme are likely to be most pronounced within areas experiencing relatively high levels of deprivation.

We understand provisions in the S106 have made to provide a £600,000 financial contribution to pump-prime and establish a new bus service that would provide a connection between the Six56 site and surrounding areas, with a particular focus on the most deprived areas outlined above to support access to employment for local residents with greatest need.

Table 4.1: Six56 Local Labour Market analysis

	Six56 Local Labour Origin			Claimant count		Economic activity		Household deprivation		Existing employment	
	High Range	Central Case	Low Range	No.	%	Economic activity rate	Un-employment	% Households with 1 or more characteristic	Average number of characteristics per household	% Transport distribution	SOC 8 & 9
Appleton (Warrington)	33	29	25	50	1%	56%	125	39%	0.49	4%	8%
Bewsey and Whitecross	**323**	**283**	**246**	**485**	**14%**	**66%**	**363**	**57%**	**0.86**	**10%**	**33%**
Birchwood (Warrington)	130	114	99	195	6%	59%	255	53%	0.77	6%	20%
Burtonwood and Winwick	47	41	35	70	2%	55%	102	50%	0.68	5%	14%
Chapelford and Old Hall	70	61	53	105	3%	68%	193	39%	0.52	5%	13%
Culcheth, Glazebury and Croft	73	64	56	110	3%	53%	203	45%	0.60	4%	12%
Fairfield and Howley	**237**	**207**	**180**	**355**	**11%**	**65%**	**334**	**56%**	**0.85**	**9%**	**30%**
Grappenhall	27	23	20	40	1%	59%	120	33%	0.41	4%	10%
Great Sankey North and Whittle Hall	50	44	38	75	2%	64%	139	40%	0.50	5%	13%
Great Sankey South	110	96	84	165	5%	64%	214	49%	0.69	7%	22%
Latchford East	**160**	**140**	**122**	**240**	**7%**	**66%**	**219**	**52%**	**0.78**	**8%**	**25%**
Latchford West	103	90	79	155	5%	60%	160	50%	0.73	7%	21%
Lymm North and Thelwall	57	50	43	85	3%	60%	147	41%	0.52	4%	10%
Lymm South	37	32	28	55	2%	58%	88	39%	0.49	3%	7%
Orford	**220**	**192**	**167**	**330**	**10%**	**61%**	**307**	**58%**	**0.89**	**9%**	**32%**
Penketh and Cuerdley	47	41	35	70	2%	56%	130	48%	0.63	5%	14%
Poplars and Hulme	**260**	**227**	**198**	**390**	**12%**	**60%**	**342**	**62%**	**0.96**	**9%**	**30%**
Poulton North	83	73	63	125	4%	56%	212	51%	0.73	6%	19%
Poulton South	50	44	38	75	2%	61%	96	47%	0.62	6%	17%
Rixton and Woolston	60	52	46	90	3%	58%	131	47%	0.62	6%	15%
Stockton Heath	30	26	23	45	1%	62%	85	37%	0.47	4%	9%
Westbrook (Warrington)	27	23	20	40	1%	64%	74	41%	0.53	5%	14%

Local labour origin - top five wards
Five wards showing highest levels within selected indicator/category

4.3 Local employment agreement

As outlined within the Planning Obligations Supplementary Planning Document for Warrington Council, the Council will seek to negotiate a reasonable proportion of employment in the construction and operational phases to be provided for local residents. In addition, it will seek to ensure that a reasonable proportion of orders in the construction phases are placed with local businesses. In both instances, a minimum threshold rate of 20% has been applied. The Council will seek to ensure that measures are targeted towards groups in greatest need – particularly residents within neighbourhoods ranked amongst the 25% most deprived in England.

Consistent with best practice adopted in respect of other schemes, the lead developer would seek to put in place Local Employment Schemes (LES) for the construction and operational phases in advance of delivering the project, working closely with Warrington Council or other nominated bodies (including Warrington & Co or the LEP). The LES will document how the development will aim to ensure that at least 20% of the workforce is drawn from the local authority area, with a focus on areas of high deprivation. In addition to employment and training opportunities, the agreement will include action that will be taken to promote the use of local suppliers of goods and services during the construction phase, for example through the use of local/online SME capacity registers; meet the buyer events; and use of a dedicated procurement portal for promoting opportunities.

The Local Employment agreement will outline plans for:

- **Identifying job and training opportunities** – this initial profiling of opportunities that can be accommodated or delivered as part of the development will need to include volumes, type, and skills levels for both the construction and operational phases:
    - intermediate labour market opportunities;
    - apprenticeships; T-levels;
    - work/industry placements for graduates;
    - higher level graduate placements; and
    - jobs – for people with skills, currently unemployed
- **Promotion of the opportunities** – this will require actively working with local agencies to advertise these opportunities and prepare local people to access them (see below re pre-recruitment training) – for example, Warrington & Co; local providers including Warrington and Vale Royal College (apprenticeships; T-levels) and local Universities if there are higher level opportunities for graduates (e.g. year in industry or graduate placement opportunities);
- **Brokerage** - in terms of matching individuals to the opportunities, the lead promoter would envisage working with local providers to target hard to help groups in the

area or individuals from deprived areas (for example, young people/NEETS/16-24yr olds; unemployed/LTU – to match supply and demand more effectively);

- **Pre-recruitment/work readiness** – the delivery of pre-recruitment training courses will be explored – again at both the construction and operational phase, for example:
  - **Construction pre-recruitment** – focused on employability skills (motivation to get out of bed in the morning, time keeping, team working) and technical skills (e.g. CSCS card), with a guaranteed interview if they are successful and/or complete the course – in line with best practice models such as those offered through FUSION 21 for example;
  - **Operational pre-recruitment** – for example Brakes who recruited 450 during phase 1 of the OMEGA development - offered a two-week bespoke training programme for all candidates who were to be interviewed which included classroom based training during week 1 (introduction to warehousing; general health and safety; interview skills and techniques; and basic literacy and numeracy), followed by two days based at a local company Linde to undergo and qualify for a FLT Licence during Week 2.
- **Cascading commitments through the supply chain** - ensuring the commitments are passed down to contractors and on to end users of the development (where possible) through the use of contract clauses; and local agreements/charters; and
- **Monitoring and evaluation** – to promote accountability and compliance – monitoring and evaluation mechanisms will be established (with action for non-compliance) and a timetable agreed for regular reporting to the Planning Authority.

It is noted that the Council has previously worked collaboratively alongside Omega Warrington Ltd to ensure construction and labour market benefits are maximised. This has been undertaken under a 'Local Employment Agreement' and sets out targets for OWL along with its construction contractors, and eventual on-site businesses, to deliver contracts, jobs, apprenticeships, school involvement and other initiatives for local people. These targets were included as conditions attached to each planning application that came forward. The agreement aimed to ensure that:

- local businesses were able to bid for tender opportunities (subcontracting and supply chain);
- local businesses were able to apply to join preferred lists for other ongoing work;
- new vacancies were offered as job and apprenticeship opportunities for local people;
- opportunities were made available for unemployed people including young people not in education, employment or training (NEET);

- work experience placements were offered for pupils, students and unemployed people; and
- local schools were invited for site visits or presentations at local schools.

Local job opportunities were an important part of OWL's (Omega Warrington Ltd) commitment to Warrington. With this in mind, OWL and Warrington Borough Council similarly entered into a 'Local Employment Agreement'. This set out targets for OWL along with its construction contractors, and eventual on-site businesses, to deliver contracts, jobs, apprenticeships, school involvement and other initiatives for local people. These targets were included as conditions attached to each planning application that came forward.

The OMEGA agreement aimed to ensure that:

- local businesses were able to bid for tender opportunities (subcontracting and supply chain);
- local businesses were able to apply to join preferred lists for other ongoing work;
- new vacancies were offered as job and apprenticeship opportunities for local people;
- opportunities were made available for unemployed people including young people not in education, employment or training (NEET);
- work experience placements were offered for pupils, students and unemployed people; and
- local schools were invited for site visits or presentations at local schools.

OWL and Warrington Borough Council regularly reviewed information provided in relation to job opportunities and training provided for infrastructure works plus the construction of buildings for Omega's occupiers. On one of their regular online updates they reported – tenders worth over £37 million had been awarded to businesses within a 25 miles radius of Omega – and 42 of these, worth almost £8 million, were awarded to Warrington businesses.

The Employment Development Manager at Warrington Borough Council commented, "So far, the total construction spend within Warrington and a 25 miles radius comes in at 26%, which for large scale construction projects is not bad. However, we will continue to strive, not just to hit our local employment targets for Omega, but to beat them."

5 Qualitative economic benefit

In addition to the quantified benefits outlined above, consideration has been given to qualitative effects arising from the proposed scheme. This considers the extent to which opportunities will benefit communities with greatest need for support, the effects of supply chain and employee expenditure within the local economy, facilitating wider economic growth and measures aimed at mitigating the environmental impact of the scheme.

the Proposed Development will create a significant number of new jobs within Warrington and across the wider LEP area. It is envisaged that a number of these opportunities will be taken-up by local residents, helping to generate increased economic activity, retain skilled people within the area and bring more people into employment. Despite the overall relative strength of the economy, there are still communities within Warrington suffering from severe levels of income and employment deprivation – as highlighted in Section 2. The Proposed Development can potentially help to support the regeneration of these neighbourhoods, providing a range of accessible jobs. While there is no certainty that residents within these areas will seize the new opportunities created, further labour market support, working with organisations such as Warrington & Co., will help to ensure that the uptake of employment by economically inactive residents can be optimised.

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. Under the Reduced Density Case, it is estimated that the Proposed Development, once fully occupied, could generate £73 million of net additional supply chain and employee spend per annum in Warrington. Based on ONS business survey data for all sectors, this would be enough to sustain up to 52 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.

More generally, 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 competitivity 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.

Finally, a package of measures will be proposed to help integrate the development with its surrounding environment. Ecological movement throughout the site will be encouraged, leading towards the Ecological Mitigation Area proposed within the south-

eastern corner of the site. This includes measures that are designed to protect the ecological areas and setting of the scheduled monument (and interpretation boards to improve awareness of the monument) whilst enhancing the surrounding green space. Limited 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.

Overall, in addition to the economic impacts that will be created during the operational phase, the proposed SIX56 development will generate a range of important wider socio-economic benefits that are expected to be sustained for a number of years.

6 Conclusion

This report has set out an updated assessment of the expected socio-economic effects of the Six56 development scheme, reflecting current assessments of distribution sector demand and local employment land need, alongside updated evidence relating to operational activity within the transport and distribution sector. The key conclusions are as follows:

Socio-economic context

- the proposed scheme continues to provide broad alignment with socio-economic objectives at a national and local level, including strategic objectives for levelling-up given the potential job creation and economic output effects adjacent to areas of deprivation within Warrington;
- The report updates analysis to cover the period 2020-22 during which the Covid Pandemic and energy crisis impacted on economic activity across the UK. Nationally, the March 2023 Economic Outlook published by the OBR confirms that inflationary pressures and supply side factors - including within the labour market - are expected to continue to impact on economic growth prospects over the short to medium term.
- Rates of economic activity and employment within Warrington and the wider LEP area remain high, with low levels of unemployment. Claimant rates have fallen to pre-pandemic levels.
- There were almost 145,000 jobs based in Warrington in 2021, with Transport and Storage accounting for 8.6% of employment. Overall job density (jobs per working age resident) was high at 1.17, with significant net commuter inflows, with Warrington benefiting from good accessibility via the M6, M56 and M62 motorways.
- A relatively high proportion of Warrington residents are employed in lower order occupations (sales, process and elementary roles). Average qualification levels are also below the national average, although the proportion with no qualifications is low. In spite of the occupational profile, median resident earnings are higher than the national average.
- Warrington is ranked the 175th most deprived local authority in the country based on the 2019 IMD. However, there are pockets of severe deprivation with the urban core of the town, around Bewsey and Whitecross; Orford; Poplars and Hulme; and Fairfield and Howley.
- There is evidence of demand and need for new distribution floorspace within the wider Warrington area, based on known requirements and evidence of take-up over the last 10 years. Based on the evidence provided by JLL, allocated and approved sites do not offer sufficient capacity or are subject to significant constraints.

Economic Impact Assessment

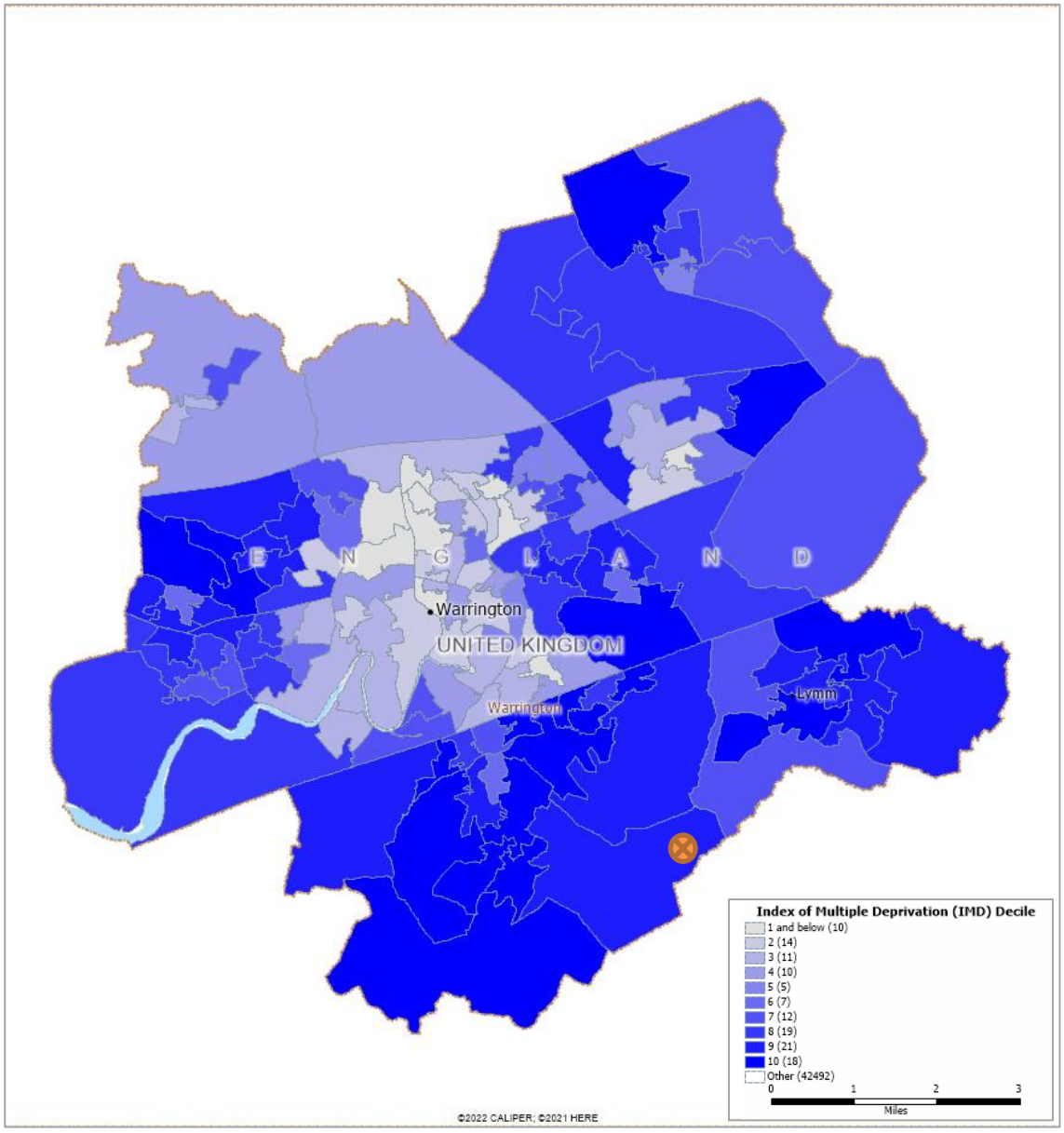
- The construction phase of the project is expected to result in 73 net additional temporary jobs in Warrington, increasing to 93 in the wider impact area. It is forecast to generate around £82 million of net additional GVA in Warrington.
- In the operational phase, the employment and GVA impacts in the wider impact area are assessed as being of substantial positive magnitude. Under the Reduced Density case analysis, it is estimated that the scheme will result in 1,226 net additional FTE jobs at the Cheshire and Warrington level, generating £118 million of net GVA per annum once fully developed out. Upper and lower ranges have been assessed, reflecting changing patterns of activity in part relating to automation within the Transport and Storage sector.
- Other positive impacts which are expected to arise include business rate revenue, training opportunities and opportunities for elementary labour market roles.

Local labour market effects

- Many of the operational jobs that would be created are expected to be accessible to new entrants to the labour market and those who are currently unemployed. The employment opportunities provided would match well with the skills profile for Warrington and help to address issues for those people with relatively low-level skills. It is envisaged that significant opportunities will be created for residents of more deprived communities.
- Provisions in the S106 have made to provide a £600,000 financial contribution to pump-prime and establish a new bus service that would provide a connection between the Six56 site and surrounding areas, with a particular focus on more deprived areas and those with highest unemployment, to support access to employment for local residents with greatest need.
- Local Employment Schemes will help to ensure that at least 20% of the workforce associated with the development (at both construction and operational phases) is drawn from the Warrington local authority area. In addition, the development will be committed to using local suppliers of goods and services wherever possible.
- The Local Employment agreements will also provide details on relevant training opportunities, how job opportunities will be promoted, the possible delivery of pre-recruitment training courses and the monitoring and evaluation mechanisms which will be established. Best practice from Omega Warrington Ltd and Warrington Borough Council's Local Employment Agreement will be followed.

Appendix A – Deprivation map

Overview Map – 2019 IMD decile ranking for the Wider Impact Area



Appendix B – Ward Map

Attached separately

Appendix C – UK Logistics and Automation

A. Introduction: UK Logistics

Logistics is a key component of modern, developed economies. British Property Federation (BPF) research reports that the UK logistics sector directly supports 93,000 businesses, generates Gross Value Added (GVA) of £80bn and sustains an employment base of some 960,000[5].

The sector has experienced robust growth over recent years and the 2020 Colliers International Logistics Viewpoint report (pre Covid19) envisaged a positive outlook for the sector in the near-term[6]. Indeed, recent analysis by Turley, on behalf of the BPF, draws attention to the link between expected population/housing growth and associated warehouse requirements to sustain anticipated continued development of online purchasing patterns[7].

The logistics sector is pivotal to the efficient functioning of everyday business supply chains and business/consumer interactions. As such, the location, scale and growth of logistics operations is likely to remain a key supporting feature of wider productivity ambitions within the UK.

The nature of logistics operations, on the other hand, is undergoing substantive change with developing and challenging market conditions coinciding with new and emerging automation technologies

McKinsey (2019) point to a range of automation options that are likely to prove of value in the sector, making the point that warehouse automation technologies can be broadly categorized into devices that assist the movement of goods and those that improve their handling[8].

While the use of automated guided vehicles (AGVs) to move cases and pallets is already established, McKinsey reference developments such as equipment and software designed to retrofit standard forklifts rendering them autonomous and providing capacity to switch between traditional and autonomous modes as required. Other emerging technologies include:

- swarm robots that move shelves with goods to picking stations;
- advanced conveyors that can move goods in any direction;
- advanced automated storage/retrieval systems (AS/ RS) to store goods in large racks, with robotic shuttles moving in three dimensions on rails attached to the structure; and

[5] BPF, Delivering the goods in 2020, The Economic Impact of the UK logistics sector.
[6] Colliers International (2020), Industrial and Logistics Viewpoint 2020.
[7] Turley (2019) What Warehousing Where.
[8] McKinsey (2019), Automation in logistics: Big opportunity, bigger uncertainty

- new handling devices that will automate the picking, sorting, and palletising of goods.

Beyond automation that replaces human activity, other extensions may include drones for internal inventory or exterior management and exoskeletons to augment human motion. Indeed, Mckinsey point to a large number of potential technologies, not yet widely implemented that might lead to further automation.

Allied to claims of the future benefits of development relating to blockchain technology, 3PL and 5PL, IoT, elastic logistics, chatbots and cobots, the logistics sector is at the forefront of an evolving automation architecture.

The objective of this paper is to examine the implications of such developments for future employment within the sector and, more particularly, for Warrington Six56. Following sections (i) highlight the broad macroeconomic background in which debates about automation impacts reside (ii) review evidence as to the potential scale of employment displacement at the microeconomic level and (iii) discuss the implications of research for the logistics sector alongside consideration of density profiles used to evaluate employment impacts.

The review covers research that reflects both empirical work looking at recent overall employment trends relating to automation and 'foresight' analyses examining the potential impact of automation.

Both strands point to the likelihood of sustained automation penetration across the economy, and for the transportation, storage and logistics sectors to be at the forefront of any associated displacement. A reading of sector-related materials, on the other hand, suggests that logistics companies have approached the issue of automation with caution and may not transition fully to whatever dominant technologies emerge for a decade or more.

The review concludes suggesting that there may be a case for considering a broader employment density range in relation to size of premises than is contained in the 2015 density guide but that moderate adjustments (10%/15%) over the next 10 to 15 years may be required for future developments to reflect continued automation in the sector.

B. Automation and Employment: Background

Until recent decades, a feature of industrial economies was that despite a century of technological advancement, the labour share of national income had remained broadly constant. This provided some optimism that automation need not reduce the role of labour as a factor of production. That regularity, however, is no longer evident and the

labour share of national income has fallen in many nations with notable decline since the turn of the century[9].

Production requires tasks which are allocated to capital or labour. New technologies impact on production not only by increasing the productivity of capital and labour at tasks they currently perform but by adjusting the balance of tasks assigned (task content) to factors of production[10].

Automation changes the task content of production negatively for labour due to a displacement effect as capital takes over tasks previously undertaken by labour. This displacement effect generally implies that automation reduces the labour share of value added. On the other hand, in permitting a more flexible allocation of tasks to factors, automation may also increase productivity and generate demand for labour in non-automated tasks.

As such, the net impact of automation on labour depends on how displacement and productivity effects combine. Historically, the displacement effect of automation has been offset by technologies that create new tasks in which labour has a comparative advantage. In addition, these new tasks generate not only a positive productivity effect but also a reinstatement effect— they reinstate labour into a broader range of tasks and thus change the task content of production in favour of labour (Acemoglu and Restrepo, 2019). This reinstatement effect is the opposite of the displacement effect and directly increases both labour share and demand for labour.

On the basis of this framework, Acemoglu and Restrepo (2019) – building on Acemoglu and Restrepo (2018)[11] - point to the fact that:

- the presumption that all technologies increase (aggregate) labour demand simply because they raise productivity is incorrect. Some automation technologies may reduce demand for labour because they bring sizable displacement effects but only modest productivity gains;
- given the displacement effect, one should not expect automation to create wage increases commensurate with productivity growth. Automation, by itself, always reduces the share of labour in value added and tends to reduce overall labour share in the economy.

From this perspective, the explanation of a stable historical labour share of national income is simply that new tasks for labour counterbalanced the effects of automation on the task content of production.

[9] Piketty, Thomas. 2014. Capital in the Twenty-First Century. Harvard University Press; Autor, David, David Dorn, Lawrence F. Katz, Christina Patterson, and John Van Reenen. 2017b. "The Fall of the Labor Share and the Rise of Superstar Firms." NBER Working Paper No. 23396; Dao, Mai, Mitali Das, Zsoka Koczan, and Weicheng Lian. 2017. "Why is Labor Receiving a Smaller Share of Global Income? Theory and Empirical Evidence," IMF Working Paper

[10] Acemoglu D and Restrepo P (2019), Automation and New Tasks: How Technology Displaces and Reinstates Labor, IZA Discussion Paper

[11] Acemoglu D and Restrepo P (2018a) The Race Between Machine and Man: Implications of Technology for Growth, Factor Shares and Employment American Economic Review.

The authors subsequently undertake a detailed analysis of the US economy since 1945, though the similarity between the nature of the issue with the UK is such to warrant consideration of the findings. Ultimately, they estimate stronger displacement effects and considerably weaker reinstatement effects during the last 30 years than the decades before. Such patterns hint at an acceleration of automation and a deceleration in the creation of new tasks in recent times.

These observations broadly reinforce work by Autor and Salomons (2018) using the EU KLEMS (industry-level panel) dataset to provide another longer-term perspective[12]. Their findings are that while labour share-displacing effects of productivity growth were essentially absent in the 1970s, they have become more pronounced over time, and most substantial in the 2000s. Once again, this finding is consistent with automation having become less labour-augmenting in recent decades and more labour-displacing.

C. Automation and Employment: Displacement Vs Productivity

The broad macroeconomic patterns described above have encouraged a significant body of research – both theoretical and empirical – seeking to explain underlying trends. Much of this work concentrates on the potential scale of employment displacement though more recent studies have tended to consider both displacement and productivity effects.

One of the early studies to focus on the issue at the microeconomic level was that by Frey and Osborne (2013) which is often used as a basis for more recent work[13]. Frey and Osborne use an online database of US job descriptions (O*NET) and develop a machine learning algorithm for estimating what they define as the probability of computerisation for different occupations. Based on a (expert guided) division of occupations between those that can/cannot be performed by 'computer controlled equipment', they suggest that 47% of jobs in the US are at high risk of being automated within a 10 to 20 year period. This study raised considerable alarm upon publication and a later Office for National Statistics (ONS) replication for the UK produced a figure of 35%[14].

Frey and Osborne were subsequently followed in a 2016 study by the OECD (Arntz et al) which makes the point that automation is likely to impact more on specific task than broad occupations and jobs[15]. They use the OECD Survey of Adults Skills (International Assessment of Adult Competencies – PIAAC) which contains individual-level data on the task composition of jobs. Following the approach of Frey and Osborne, but focusing on tasks rather than occupations, they estimate that some 9% of OECD area jobs are at high risk of automation. This is primarily due to the fact that bundles of tasks are difficult to

[12] Autor, D and Salomons A (2018) Is Automation Labor-Displacing? Productivity Growth, Employment, and the Labor Share, Brookings Papers of Economic Activity, BEPA Conference, 2018
[13] Frey, C and Osborne, M (2013), The future of employment: How susceptible are jobs to computerisation? Working Paper, University of Oxford, Oxford later published (2017) in Technological Forecasting & Social Change
[14] ONS (2019) The probability of automation in England: 2011 and 2017.
[15] Arntz M, Gregory T and Zierahn U (2016), The Risk of Automation for Jobs in OECD Countries, OECD Social, Employment and Migration Working Papers No. 189

automate and the study suggests that more jobs are likely to experience change than be automated. This set of outcomes is substantially more conservative than those from Frey and Osborne.

Price Waterhouse Coopers (PwC) take the matter further also using an OECD dataset that details jobs tasks across 200,000 workers[16]. They suggest that the process of automation is likely to contain three overlapping waves, namely an:

- algorithm wave that focusses on automation of simple computational tasks and analysis of structured data in areas like finance, information and communications and viewed as already underway;
- augmentation wave that focusses on automation of repeatable tasks such as communicating and exchanging information through dynamic technological support, and statistical analysis of unstructured data in semi-controlled environments viewed as underway but likely to reach full maturity in the 2020s; and
- autonomy wave that focusses on automation of physical labour and manual dexterity as well as problem solving in dynamic real-world situations that require responsive actions as in manufacturing and transport (e.g. driverless vehicles) viewed as under development and expected to reach full maturity economy-wide in the 2030s.

PwC develop an automation-rate prediction algorithm trained on the OECD data (as per Arntz et al) for the UK, US, Germany and Japan before being extended to 29 countries. The results for the UK suggest automation rates of 2% for the algorithm wave, 20% for the augmentation phase and 30% for the autonomy wave.

PwC comment that countries like the UK and the US, with services-dominated economies but also relatively long 'tails' of lower skilled workers, could see intermediate levels of automation in the long run. They also point to significant differences in potential impact across types of workers with much lower automation rates for highly educated workers.

McKinsey Global Institute (2017) assess the technical potential for automation of the global economy via analysis of component activities within occupations[17]. The analysis covers 46 countries representing more than 80% of the global economy and uses databases including the US Bureau of Labor Statistics O*Net database to break down 800 occupations into more than 2,000 activities, determining the performance capabilities needed for each activity. These activities are then broken down into 18 capabilities each of which is assessed for technical potential.

A machine-learning algorithm scores work activities in relation to the 18 performance capabilities and adoption is modelled across four phases - technical feasibility, solution development, economic feasibility and end-user adoption - using a standard diffusion

[16] Price Waterhouse Coopers (PwC) (2018), Will robots really steal our jobs? An international analysis of the potential long term impact of automation
[17] McKinsey Global Institute (2017) A Future That Works: Automation, Employment, And Productivity

model. Overall, they estimate that some 49% of the activities that people are paid to do in the global economy have the potential to be automated by adapting currently demonstrated technology. That said, fewer than 5% of all occupations are at risk of full automation though this is based on a high risk of automation threshold 100% rather than the 70% adopted by the other studies. Adjusted to 70%, their model suggests around 30% of jobs are automatable, a figure similar to PwC.

Nedelkoska and Quintini, also (2018) build on the study of Arntz, et al (2016) study and seek to exploit the PIAAC dataset further, accounting for variation in tasks within narrowly-defined occupational groups[18]. Coverage is extended to all 32 countries participating in PIACC and the authors claim that the approach is better aligned to the original expert assessment of potential automation used in Frey and Osborne (2013). The study also includes workers who lack basic computer skills and/or are in jobs that do not require using a computer. The main study findings are that:

- 14% of jobs in participating OECD countries are highly automatable (i.e., have a probability of automation above 70%).
- 32% of jobs have a risk of between 50 and 70% pointing to the possibility of significant change in the way these jobs are carried out as a result of automation;
- there exists wide variation in automation potential across countries though this reflects cross country differences in occupational mix within sectors;
- the occupations with the highest estimated automation potential typically only require basic to low level of education. At the other end of the spectrum, the least automatable occupations almost all require professional training and/or tertiary education.

Within the UK, the Office for National Statistics (ONS) have also examined the scope for automation[19]. ONS adopts the OECD analysis framework using UK data from the PIACC survey, taking just under 9,000 individuals and applying Frey and Osborne probabilities of automation (converted to UK occupation codes). Since the PIAAC data uses two digit occupation codes, and the Frey and Osborne probabilities use four digit codes, each individual in PIAAC is assigned multiple probabilities of automation.

ONS run regressions to determine the influence of job characteristic on the probability of automation. Results are mapped to the Annual Population Survey (APS) though some compromise is required due to the absence of job task information from the latter and the APS covers England rather than the UK. Probabilities of automation are grouped in three categories:

- low risk of automation: probabilities lower than 30% to which are assigned 28%; of UK occupations;

[18] Nedelkoska L and Quintini G, (2018) Automation, skills use and training, OECD Social, Employment and Migration Working Papers No. 202
[19] ONS (2019) The probability of automation in England: 2011 and 2017.

- medium risk: probabilities between 30 and 70% and assigned to some 60%; of occupations; and
- high risk: probabilities greater than 70% to which 7% of occupations are assigned.

More generally, and as Carbonero, Ekkehard and Weber (2018) point out, there exists a strand of academic research into the impact of robots and automation on employment that falls into two broad strands[20]. The first uses industry-country panel settings -Graetz and Michaels (2015)[21]; De Backer et al (2018)[22] while the second focusses on local labour markets - Acemoglu and Restrepo(2017)[23]; Chiacchio et al. (2018)[24]. They also point out that evidence of impact is ambiguous, both within and between the two approaches:

- Graetz and Michaels (2015) find no link between robots and overall employment in developed countries, while De Backer et al. (2018) show a positive correlation between robot investment and employment within multinational enterprises in developed countries.
- Acemoglu and Restrepo (2017) report that one more robot per thousand workers negatively affects the US employment-to-population ratio by 0.37 percentage points, while Chiacchio et al. (2018) find a figure of 0.16-0.20 in the EU.

Brynjolfsson, Mitchell and Rock (2018) provide an interesting counterpoint as they address the issue of which tasks will be most affected by machine learning (ML) and which will be relatively unaffected[25]. Their work draws attention (as per Arntz et al) to the insight of Autor, Levy, and Murnane (2003) whereby an occupation can be viewed as a bundle of tasks, some of which offer better applications for technology than others[26].

In the first instance, they examine the channels by which ML can affect the workforce and evaluate the potential for applying ML to tasks against the 2,069 work activities, 18,156 tasks, and 964 occupations in the O*NET database. This allows them to build measures of "suitability for machine learning" (SML) for labour inputs in the US economy and to conclude that:

- most occupations in most industries have at least some tasks that are SML;
- few if any occupations have all tasks that are SML and

[20] Carbonero F, Ekkehard E and Weber, E (2018), Robots worldwide: The impact of automation on employment and trade, ILO, Working Paper 36
[21] Graetz, G.; Michaels, G. (2015) Robots at work, in CEP Discussion Paper No 1335
[22] De Backer, K. DeStefano T. Menon, C. and Suh, J (2018). Industrial robotics and the global organisation of production, in OECD Science, Technology and Industry Working Papers, 2018/03, OECD Publishing, Paris.
[23] Acemoglu D, Restrepo P (2017) Robots and jobs: Evidence from US Labour Markets, in NBER Working Paper No. w23285.
[24] Chiacchio F; Petropoulos G, Pichler D (2018). The impact of industrial robots on EU employment and wages: A local labour market approach, Bruegel Working Papers.
[25] Brynjolfsson E, Mitchell T and Rock D, What Can Machines Learn and What Does It Mean for Occupations and the Economy?, AEA Papers and Proceedings 2018, 108: 43–47
[26] Autor, David H., Frank Levy, and Richard J. Murnane. 2003. "The Skill Content of Recent Technological Change: An Empirical Exploration." Quarterly Journal of Economics 118 (4): 1279–333.

- unleashing ML potential will require significant redesign of the task content of jobs, as SML and non-SML tasks within occupations are unbundled and rebundled.

The implication that automation may change the nature of existing work, rather than eradicate whole occupations, provides a timely reminder that linear application of 'full automation' assumptions in automation impact analysis may not serve well. Indeed, a more recent trend in analysis takes a broader perspective and potential benefits are examined alongside the potential downsides of automation.

Oxford Economics (2017) undertake a study on behalf of Cisco that seeks to combine a "bottom-up" analysis of the tasks that will be automated with a "top-down" analysis of the economic growth and job creation that the same technological progress will bring about in the US economy[27]. To do this, they model two effects:

- displacement effects: technological change impacts related to displacement of workers from performing tasks that technology can now do better;
- income effects: labour saving innovations reduce production costs which are passed on to consumers through lower prices, leading to an increase in spending power.

In practice, the OE displacement effect follows much of the same path as others, using datasets from O*NET as the basis for analysis. As elsewhere, the approach is to work with experts to define the advances technology will likely make over the next 10 years and to assess how such changes will impact on the working environment.

In terms of outcomes, OE suggest that the displacement effect - in isolation - would affect 8.4 percent of workers by 2027, a proportion very similar in magnitude to OECD outcomes though substantially smaller than Frey and Osborne (2013). The estimated income effect, on the other hand, is such that overall employment from automation is a net positive.

Vermeulen et al (2018) provide supporting evidence. They employ the standard approach of O*NET occupations assessed for automation potential by robotics experts[28]. Their analysis concludes that, overall, job loss related to automation is likely to be limited and to be offset by job creation both in new and spillover sectors – a process typical of conventional historical structural change.

Following on from their previous work, and using data from the International Federation of Robotics (IFR), Oxford Economics investigate the ways in which the installation of additional industrial robots have affected local manufacturing employment in Japan, the European Union, the United States, South Korea, and Australia[29]. Constructing an 11 year regional panel dataset of robot stock alongside other labour market indicators enables them to isolate the impact of robotisation from other strong influences on local labour markets.

[27] Oxford Economics (2017) The AI Paradox: How Robots Will Make Work More Human
[28] Vermeulen B , Kesselhut J, Pyka A and Saviotti p (2018) The Impact of Automation on Employment: Just the Usual Structural Change, mdpi,
[29] Oxford Economics (2019) How Robots Change the World

Using IFR growth projections for new robot installations (allowing for replacement of existing robots) econometric modelling suggests that each newly installed robot displaces 1.6 manufacturing workers. As such, by 2030, they estimate that as many as 20 million additional manufacturing jobs worldwide might be displaced due to robotisation. Analysis also suggests that full impact will take time to materialize with displacement of some 1.3 workers in the first year extending to 1.6 over subsequent years.

OE also point out that while loss of jobs is inevitable, the wider population also benefits from a "robotics dividend"— lower prices for manufactured goods, higher real incomes, and stronger tax revenues. Their modelling suggests that a 1% increase in the stock of robots per worker in the manufacturing sector alone leads to a 0.1% boost to output per worker across the wider workforce.

As far as displacement is concerned, studies tend to fall into two broad categories which estimate the proportion of employment at high displacement risk in the 7% to 14% range or 30% to 40% range. Study methodologies are both varied and complex which may account for part of the difference, but it is clear that the general expectation is for continued displacement activity over the next decade. Productivity effects are considered in far fewer studies but, in broad terms, are place at around 10% of employment across the economy as a whole.

D. Automation and Employment: Transport/Logistics

Many of the studies reviewed focus on broad economy wide impacts related to automation but those that consider occupations also provide some perspective on potential impacts at sector-level. In terms of displacement, most are consistent in suggesting that the transportation/storage/logistics sector is at particular risk through the automation process,

Frey and Osborne (2013) draw attention to the fact that most workers in transportation and logistics operation (together with of office and administrative support workers production occupations) not only have a high probability of substitution but are likely to be substituted by 'computer capital' relatively early in the automation process.

While PwC (2018) anticipate significant variations in potential automation levels both between industry sectors and waves, transportation and storage stands out as a sector with particularly high potential for automation – some 52% of the sector are ultimately viewed as 'at risk' - though change is expected to be modest in the algorithm wave and peak in the autonomy wave envisaged by the 2030s.

In line with other studies Nedelkoska L and Quintini G, (2018) find that automation is mainly likely to affect jobs in the manufacturing industry and agriculture, although a number of service sectors, such as postal and courier services, land transport and food services are also found to be 'highly automatable'. Likewise, and directly tuned to the UK, ONS (2019) report that all transport-related operatives have potential automation rates above 50% with some driving occupations above 60%.

In the Oxford Economics AI study (2017) of the US, displacement impact is aggregated into 22 occupational groups with transportation and material moving jobs defined as the most heavily disrupted. These jobs are not eliminated entirely as many workers will evolve, retrain and remain in their jobs. Nevertheless, the analysis implies a 17 percent displacement of these workers focusing mainly on roles characterized by tasks such as operating mechanized equipment and performing general physical activities.

Mapping occupations to industries, the greatest workplace disruption is experienced in 'transportation and warehousing' industry where more than 15% of full time equivalent (FTE) jobs are likely to be displaced. This is offset to some degree by a projected income effect gain of some 7% but leaves the sector in a net deficit position equivalent to 8% of FTE jobs.

McKinsey Global Institute(2017) provide a breakdown of potential automation across US industry sectors. As elsewhere, transportation and warehousing is ranked fourth with a score of 57 from a maximum of 100. This contrasts with a score of 73 for accommodation and food services, 60 for manufacturing; 58 for agriculture and 53 for retail.

Regardless of the variation in approaches and timing, most of the studies reference the transportation and storage industry as a primary candidate for automation. It is difficult to take a view other than that automation is likely to impact on the sector over the course of the next decade. The timing and scale of impact is difficult to discern though anywhere between 10% and 15% would not appear an unreasonable assumption with full effects more likely to appear towards the end of the decade.

E. Automation and Employment: Employment Density profiles

The projected nature of automation induced change in transportation/storage/logistics brings with it implications for the use of density profiles in calculating future employment in new transport and warehouse developments. Current density calculations are typically based on the HCA Employment Density guide published in 2015[30]. The guide indicates that densities should be of the order of 95 employee per m^2 for national distribution centres, 77 employees per m^2 for regional distribution centres and 70 employee per m^2 for 'final mile' distribution centres[31]. This range is slightly wider than the range used previously (2010).

In developing guidance, the HCA document references the surveys undertaken by Prologis across distribution centre customers, providing details of average employment densities for a typical 500,000ft^2 building and covering 2006, 2010, 2014 and 2018. The 2019 Prologis study (covering 2018) reports that in 2006 customers employed one person for every 95m^2 of floor space which increased to one for every 77m^2 in 2010, 69m^2 in 2014 and back to 95m^2 in 2018[32]. There is no definition of the employment base but the

[30] Homes & Communities Agency (2015), Employment Density Guide, 3rd Edition
[31] All GEA-based.
[32] Prologis Technical Insight (2019), Delivering the future: the changing nature of employment in distribution warehouses.

questions asked in the survey imply that it is absolute rather than FTE employment that is used in calculations[33].

The figures clearly reflect variation in the pattern of customers over the period but a differential of close to 30% in density, alongside a 'u' shaped profile over time, does not help in terms of consistency. The HCA Guide indicates some degree of caution in employing the higher densities and suggests that consultations do not generally provide support for their use, a conclusion that would appear justified in retrospect.

Beyond provision of generic densities, Prologis reports detail on the size of premises, type of employment and number of employees from the customer sample, with some rounding adjustments to ensure anonymity. The permits further analysis of density profiles within size bands of premises.

In terms of 2014, the data suggests (mean) employment densities of 46 employees per $m^2$for premises less than 10,000m^2; 72 per m^2 for premises between 10,000$m^2$and 20,000 m^2; 50 per m^2 for premises between 20,000 m^2 and 30,000 m^2 and 101 per m^2 for premises over 30,000 m^2. Overall sample density is put at 69 per m^2 which corresponds with the figure reported.

For 2018, the data suggests (mean) employment densities of 65 employees per $m^2$for premises less than 10,000m^2; 84 per m^2 for premises between 10,000$m^2$and 20,000 m^2; 60 per m^2 for premises between 20,000 m^2 and 30,000 m^2 and 187 per m^2 for premises over 30,000 m^2. Overall sample density is put at 100 per m^2 which is marginally higher than the figure reported

Some caution is necessary in dealing with these numbers. Not only is the number of observations within any one size band relatively small, there also exist differences in premises size, both of which may influence calculation of mean values. In practice, the 2014 figures are more compressed than the 2018 figures – removing the 3 largest/smallest premises reduces the 2014 mean density from 69m^2 to 65m^2 compared to a fall from 100m^2 to 85m^2 for 2018 – a figure well within the range in the HCA guide.

Nevertheless, two observations are worth making, and apply whether with the full or reduced sample range as described:

- there appears to exist a density differential connected to larger premises which appear to have a lower employment per unit of floorspace;
- contrasting 2018 with 2014 suggests a reduction in employment numbers per unit of floorspace across all size-bands

These observations have to be balanced by the fact that the Prologis profiles are not FTE equivalent and that there is a decline the proportion of full-time workers reported from 89% in 2014 to 78% in 2018. As such, differentials with HCA densities are less extensive than might appear, prima-facie.

[33] The proportion of full time employees declined by 10 percentage points between 2014 and 2018.

Inferring the impact of automation from a comparison of the 2014 and 2018 Prologis profiles may be misleading in that the earliest (2006) survey also suggested an employment density of some 95m^2 per employee. Likewise, despite the caution referenced in the HCA about the 2010 and 2014 densities, they are broadly consistent.

It is difficult to make definitive statements about the Prologis evidence other than that it is far from inconsistent with the displacement hypothesis and evidence for the sector outlined in the research review above. On the basis of this limited evidence, there may be a case for considering a broader employment density range in relation to size of premises than is contained in the 2015 density guide but that moderate adjustments (10%/15%) over the next 10 to 15 years may be required for future developments to reflect continued automation in the sector.

F. Overview

Changes in the underlying features of industrial economies, coinciding with increasing automation, have resulted in a wave of academic and professional research. An emerging perspective appears to be that although recent patterns of automation are intrinsically no different from other previous periods of technical change, the balance between displacement downsides and productivity upsides may have altered towards the former.

Estimates of the scale of potential labour displacement range from a conservative 7%/14% to a more disruptive 35%/40%. This range can partly be explained by different study methodologies but it is clear that most analysts anticipate some degree of displacement which, at sector level, may not be compensated by productivity/income effects even if the latter are sufficient to globally offset the former. It is also clear that analysts anticipate the transportation, storage and logistics sectors to be at the forefront of displacement, perhaps moderately so over the next few years but very definitely so a decade into the future.

A reading of sector-related materials suggests that logistics companies have approached the issue of automation with caution. This is a rational response to a fast-evolving technical environment when it is far from clear which technology will win-out and it is more cost effective to streamline current processes. This trend may well persist though, ultimately, as the highest priority for companies is to identify and implement technologies that support more efficient order delivery, large firms will typically prove to be first-movers and bring smaller units in their wake. If the analysis discussed proves in any way accurate, however, it may still take the best part of a decade before implementation progresses apace and the full implications of automation become more evident.

Overall, the evidence available does appear to intimate steadily increasing automation penetration within the logistics sector. What limited evidence exists as to employment/floorspace densities suggests that there may be a case to consider scale of premises as an element in density calculations. There exists implicit recognition of scale in existing HCA guidance through the national/regional distinction applied to distribution

centres. The Prologis profiles, on the other hand, suggest that the density range may be conservative in relation to larger premises that are more likely to introduce automation.

Appendix DR07 – Climate Change and Energy Statement

Climate Change and Energy Statement

1.1. The Statement sets out how climate change and energy issues have been addressed in respect of the Application proposals. It addresses the following:-

- Suitability of road-based logistics.
- Locational characteristics.
- Environmental Matters.
- Energy Efficiency.
- Warrington Sustainability Appraisal (August 2021).

Suitability of road-based logistics

1.2. National and local policies do not preclude road-based logistics and neither do recent Secretary of State decisions. The NPPF (21) (CD1.1) promotes sustainable development and recognises the need to support economic growth and productivity. Paragraph 81 states '*Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*' Paragraph 83 makes particular reference to logistic operations in that '*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations'.*

1.3. Section 9 of NPPF (21) (CD1.1) sets out details associated with promoting sustainable transport. This includes making sure transport issues are considered at an early stage of plan making and development proposals,

including the scale and location of development; promoting walking, cycling and public transport use; and designing to integrate parking and other transport considerations. Paragraphs 104 and 105 says that significant development should be focused on locations which are or can be made sustainable. There are no specific requirements within the NPPF (21) (CD1.1) for logistics development to be rail based and there are no specific policies that preclude road based logistics.

1.4. In terms of Climate Change, paragraph 152 (Chapter 14) states that '*The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure'*. Paragraph 154 requires that new development should be planned for in ways that '*a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design*".

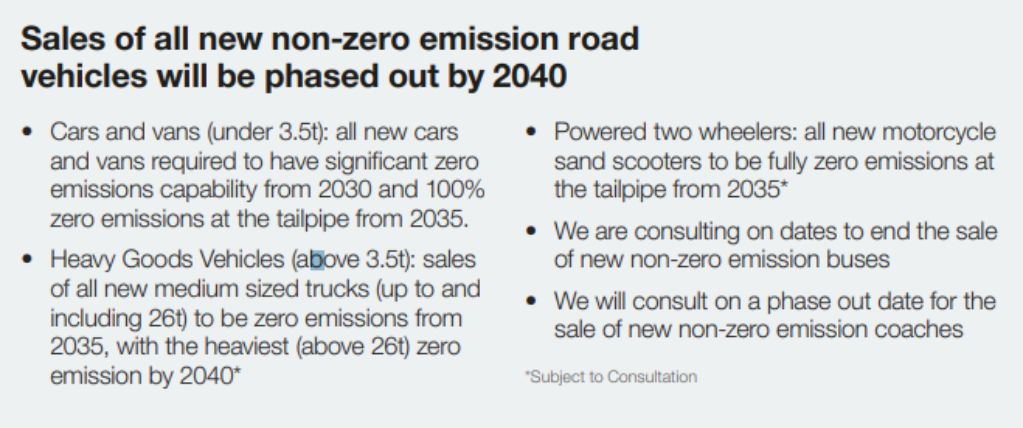
1.5. These requirements are to support a transition to a low carbon future and hence do not preclude road based logistics which will form part of this low carbon future as set out in the Government's decarbonising transport agenda.

"*Decarbonising Transport – setting the challenge*" (March 2020) (CD4.136)

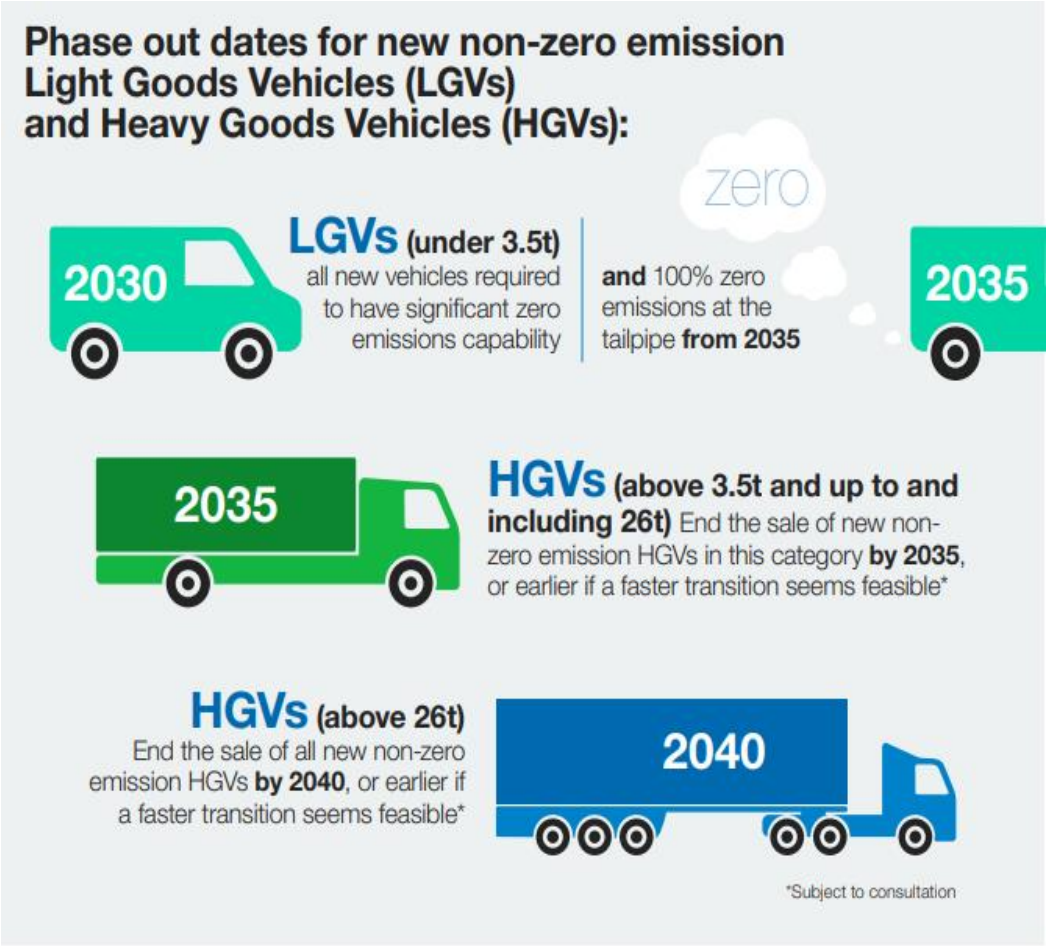
1.6. This document seeks to set out a pathway to move towards the decarbonisation of transport. Section 3 of the document (CD4.136) addresses the delivery of goods and services and paragraph 3.1 (CD4.136) confirms that "*the swift and efficient movement of goods is vital to the UK economy*". It shows that 79% of domestic freight is moved by road. It sets out the Government's aims and targets and recognises a voluntary, industry-supported commitment to reduce HGV GHG emissions by 15% (from 2105 levels). It also recognises the "*new Heavy Duty Vehicle (HDV) CO2 emission standards regulation came into effect in July 2019. This establishes for the first time CO2 reduction targets for HDVs. The new regulation sets binding C02 emission reduction targets for HDV manufacturers of 15% by 2025 and 30% by 2030 (based upon 2019 emission levels*)". It also sets out the policies in place to deliver these targets which include developing ultra-low emission standard for trucks; trailing a range of low-emission technologies for freight; and demonstrator projects. It shows that "*HGV GHG emissions are projected to fall by 26% from 2018 to 2050, despite a projected increase in HGV km of 7% over the same period*". The document also sets out the approach for vans and e-cargo bikes and it confirms that the Government's aim is for all cars and vans to be effectively zero carbon emission by 2030.

The Decarbonising Transport – A Better Greener Britain document (2021) (CD4.137)

1.7. The Decarbonising Transport – A Better Greener Britain document (2021) (CD4.137) confirms:-



1.8. The document (CD4.137) includes a chapter on "*delivering a zero emission freight and logistics sector*" which confirms that "*removing these emissions requires the development and deployment of clean technologies, as well as the use of more sustainable forms of transport, many of which are already available including cargo bikes and rail*".


Phase out dates for new non-zero emission Light Goods Vehicles (LGVs) and Heavy Goods Vehicles (HGVs):
zero
2030
LGVs (under 3.5t) all new vehicles required to have significant zero emissions capability
and 100% zero emissions at the tailpipe from 2035
2035
2035
HGVs (above 3.5t and up to and including 26t) End the sale of new non-zero emission HGVs in this category by 2035, or earlier if a faster transition seems feasible*
HGVs (above 26t) End the sale of all new non-zero emission HGVs by 2040, or earlier if a faster transition seems feasible*
2040
*Subject to consultation

DAF LF Electric truck. Accreditation: Leyland Trucks Ltd.

Electric HGVs creating manufacturing jobs in the UK

Leyland Trucks, a PACCAR company and the UK's largest HGV manufacturer, recently announced the zero emission DAF LF Electric, coming to market this year. This 19-tonne, fully electric distribution truck has a range of 174 miles on a single charge and can complete a rapid recharge from 20% to 80% in 60 minutes. For urban distribution, this will allow the truck to charge during a driver's rest break. The truck is also designed to power auxiliary equipment such as a refrigeration unit or a crane. The LF model is in addition to the heavier CF Electric, up to 37 tonnes, suitable for interurban, supermarket, and waste collection. Leyland Trucks manufactures the full line of DAF models and is based in Lancashire, employing over 1,000 people in the UK.[145]

Commitment

We will demonstrate zero emission HGV technology on UK roads this year

Given uncertainty about which zero emission technology is most suitable for decarbonising long-haul HGVs, we are investing £20 million this year to support industry to develop cost-effective, zero emission HGVs and refuelling infrastructure across the UK. This includes designing electric road system and hydrogen fuel cell trials, developing technology and UK supply chains, and providing funding to demonstrate and prove real world applications of emerging battery electric trucks.[146]

In line with advice from the Climate Change Committee, turning designs into full trials will inform decisions on the best route to a fully zero emission UK road freight sector, particularly the roll out and location of the necessary supporting infrastructure.[147]

1.9. It is clear from the above that road-based logistics has a crucial role to play in freight and logistics in the future and that significant progress is being made to decarbonise road based vehicles, and promote a low carbon transportation network to reduce greenhouse gas emissions. There is no suggestion that road-based logistics is not in line with the Government's decarbonising transport plan.

1.10. Warrington Borough Council have also published their response to the climate emergency and have developed plans and targets to define, shape and guide their work to become carbon neutral by 2030. Their programme of works set out in their EV Charging Strategy (December 2022) (CD4.138) supports the transition of HGV's and LGV's to EV's in the next five years. This is intended to meet with the Governments objectives set out in the Decarbonising Transport – A Better Greener Britain document (2021) (CD4.137).

Recent Secretary of State Decisions

1.11. The Secretary of State considered the specific matter of road based logistics in November 2020 in determining a National Distribution Centre (NDC) building (Use Class B8) proposal at Barley castle Lane, Appleton Thorn, Warrington (CD4.139). This site is immediately next to the Application Site.

1.12. For the reasons given in MR400-402 the Secretary of State agrees (paragraph 44) with the Inspector that a road-based freight proposal would not be unacceptable as a matter of principle. The Secretary of State also agrees with the Inspector at AR162 that there is no firm evidence before him to suggest that there is no place at all for road-based freight provision in the future.

1.13. The Inspector addressed Climate Change in paragraphs 160 – 164. Objectors argued that road based logistics is contrary to the objectives of Climate Change (paragraph 161) and the Inspector referred to his earlier main report conclusions (paragraphs 400 – 402) and confirmed that "*notwithstanding the impetus given to rail as a result of the announcement (HS2), there is no firm evidence before me to suggest that there is no place at all for road-based freight provision in the future*". His paragraph 163 indicates that "*the strategic spatial location of Warrington on the highway network is a vital asset for the town in attracting freight and logistics companies that support the local economy*". The First Main Inspectors Report paragraphs 400 - 402 responds to resident concerns about the scheme not according with documents by such bodies as DfT, Transport for the North, Campaign for Better Transport, Labour Party, and Council. It was argued that the appeal proposals perpetuate and cater for road-based freight transport whereas the documents place increased emphasis on provision for rail freight through facilities such as SRFIs. The Inspector found "*none of the matters raised by Mr Thrower or other parties cause me to think that a road-based freight proposal would be unacceptable as a matter of principle*".

1.14. The five other Call In decisions by the Secretary of State in the NW (CD4.128, CD4.129, CD4.130, CD4.131, CD4.132, CD4.133) were all road based logistics schemes for which the Secretary of State granted planning permission.

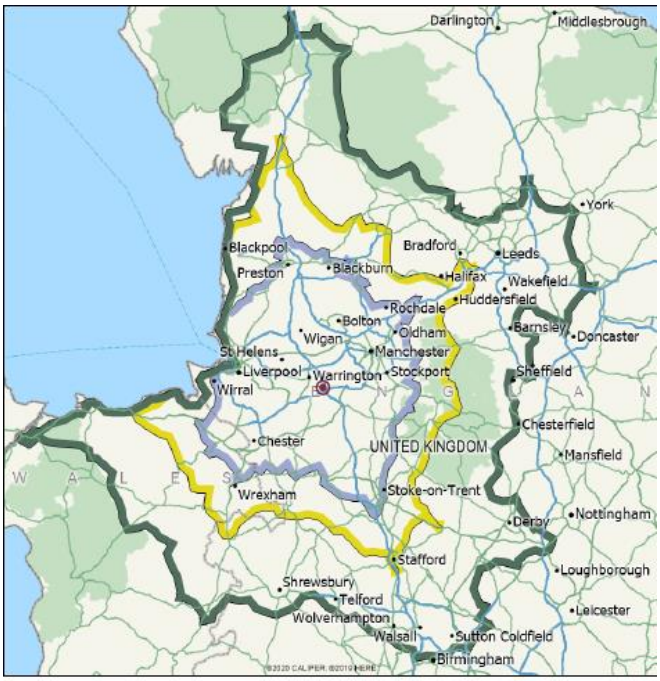
Locational Characteristics

1.15. The Model Logic Report (March 2023) which is included within Mr Pexton's Appendix, confirms that the Application Site could operate as an Import Centre via Liverpool2 port and that it has a "*silver*" categorization for such usage which puts it only 3.45% from the best performing motorway junction in the region. The Model Logic Report confirms that '*Liverpool ranks top overall and scores highly in terms of capacity, expected export and import growth. It also*

scores well for the size of the logistics market, the availability of land, access to consumer markets and skilled labour. Liverpool will also benefit from Freeport status". The Application Site can therefore benefit from its proximity to Liverpool2 port which allows for a large proportion of the journey of goods from the continent to be by ship rather than road.

1.16. The Model Logic Report uses the 60 minutes' drive time to cover its large population catchment. It assumes that local deliveries are made by using electric vehicles (EVs) and it sets out why the 60 minutes' drive time is appropriate based upon EVs having a maximum driving distance of 150 miles. The results of the analysis within the Report show that the Application Site has the largest population catchment (out of 22 sites studied) within the 60 minute drive time.

1.17. The Application Site is in an excellent location to support road-based logistics whilst promoting the use of sustainable modes of travel for its employees and last mile distribution by electric vans. The evidence of Mr Vogt sets out the proximity of the Application Site to the Strategic Highway Network and the Model Logic Report confirms the crucial nature of the motorway network for logistics distribution. The map below is taken from the Model Logic Report which shows the boundaries of the zones that can be reached within 45 (grey), 60 (yellow) and 90 (green) minutes' drive from the Application Site.



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.

1.18. Sustainable transport initiatives that can be delivered through the Application proposals as set out in Mr Vogt's evidence. He sets out the proximity and frequency of bus stops and also the proposals to enhance this provision which will be of benefit to not only the employees of the Application proposals but also employees of existing premises at the adjacent Appleton Thorn employment area.

Electric Vehicle Charging

1.19. Draft planning condition 51 requires through the Reserved Matters submissions, the submission of a "*site wide sustainable energy infrastructure framework*" which will include *"details of the decarbonisation of transport used in connection with the development"*. This agreed condition provides the ability to

ensure that the Application proposals deliver the above requirements and meet the Council's objectives set out in their EV Charging Strategy (December 2022) (CD138) which supports the transition of HGV's and LGV's to EV's in the next five years.

Environmental matters (including Ground, Contamination, and Waste; Flood Risk and Drainage; and Ecology and Biodiversity

1.20. All Environmental Matters were covered in the Applicant's Environmental Assessment (CD4.1 to CD4.15) and evaluated in the Council's Officer Report to Committee (CD4.151). Matters relating to climate change were embedded into each of the environmental disciplines and detailed mitigation was proposed which has been translated into draft planning conditions.

Energy Efficiency

1.21. The Energy ES Technical Paper (CD4.13) considered the proposed energy strategy for the Application proposals including the anticipated energy demands and subsequent carbon emissions when operational. It takes account of the opportunities and limitations of the Application Site, the availability of utility supplies and the subsequent energy demands and carbon emissions of the types of building proposed. It focusses upon following a strategic approach to reducing energy and consideration of what the impacts of energy use will be on Carbon Emissions and NOx production at both construction and operational phases. The Energy Strategy is to promote Low Carbon Design through passive design, energy efficiency measures, and design features for future installation of renewable and low carbon technology. The Application proposal is an outline application and hence no details of the detailed constructional design have been included as part of the Application submission. The Applicant has however confirmed that the detailed scheme design will

promote passive measures to maximise insulation and natural light, as well as adoption of the use of energy efficient technologies such as lighting systems and promotion of the potential incorporation of renewable and low carbon solutions, such as photovoltaics. Combined Heat and Power (CHP) (through natural gas, ground source heat pumps and/or air source heat pumps), rainwater recycling and green roofs have also been identified as a potential for further consideration for the Application Site.

1.22. The Application also included a "*whole life carbon assessment*" (CD4.40) which outlines the Application proposal's carbon impact on the environment over its entire life. It considered a number of embodied carbon reduction options and identified how a more detailed calculation of embodied carbon would be carried out.

1.23. The Officer Report to Committee (CD4.151) confirmed in paragraphs 10.297 – 10.298 that the mitigation measures in the "*energy technical paper*" and the "*whole life carbon assessment*" are considered acceptable. It recommended planning conditions to ensure that these measures are incorporated in reserved matters submissions. Draft planning conditions 49, 50 and 51 require the submission of an "*energy statement*"; a "*detailed whole life cycle carbon assessment"* and a "*site wide sustainable energy infrastructure framework"* which will ensure that the Application proposals achieve the most appropriate energy / carbon approach.

Warrington Sustainability Appraisal (August 2021) (CD4.97)

1.24. The Warrington Council Sustainability Appraisal (August 2021) (SA) (CD4.97) was produced to support the emerging Local Plan. Appendix H of the SA comprises the appraisal of the broad employment areas and the Application Site formed part of Option 1 ("*Land at M56 Junction 9*").

1.25. In respect of the "*economy and employment*", it is noted that "*Whilst Omega and the M56 (J9) employment areas are less likely to provide jobs that are more easily accessible to deprived communities (compared to the Port Warrington / Wider Waterfront), they are more attractive for strategic distribution and warehousing. Whilst providing local job opportunities, these locations should therefore also attract workers from a wider travel to work area. A significant positive effect is therefore predicted for Options1 and 3*".

1.26. With regard to *"health and wellbeing",* it is noted that "*For the M56/J9 site, the development would be less accessible by these modes of travel to communities in the existing urban area. However, they should be accessible to communities if an urban extension is proposed in south east Warrington. Effects upon amenity are not anticipated to be significant at the broad employment area at Port Warrington / Waterfront and at the M56/J9*".

1.27. With regard to "*Accessibility*", it is noted that "*The M56/J9 broad employment area does not have strong existing public transport links. Therefore, increased development in this area would be likely to encourage car use. It's good connection to the motorway network could also encourage car usage, particularly from longer distance commuters. However, if an urban extension is proposed in south east Warrington development here could support new public transport services into this area, which would help to increase levels of usage from within Warrington. Improvements to the strategic road network would also be anticipated, to accommodate new development and relieve congestion….. Overall, uncertain effects are predicted for each option with regards to accessibility. Whilst each option is expected to increase car trips and HGV traffic, each could potentially include improvements to transport infrastructure and public transport services. Each location is broadly supported by exiting public transport, though the more peripheral sites such as the M56 and Fiddlers Ferry are less well serviced and may require upgrades*".

1.28. With regard to "*natural resources: land resources*", it is noted that "*Land at M56 J9 is classified as a mix of Grade 2 and Grade 3 agricultural land. Development would be likely to result in the loss of over 60ha of agricultural land, and therefore a significant negative effect is predicted*".

1.29. With regard to "*water quality*" and "*air quality*" all options are scored equally. With regard to "*flooding*", it is noted that "*Land at M56 J9 falls entirely within flood zone 1 and therefore effects on flood risk are predicted to be neutral*". With regard to "*built heritage*" it is noted that "*Development in the broad employment area at M56 J9 (Option 1) could potentially have effects upon several listed farm buildings, whether that is through a direct loss of such assets, or effects upon their settings. The setting of Bradley Hall Moated Site (Ancient Monument) could also be affected by development in this location. There is potential to mitigate effects through the use of landscape buffers and avoiding the more sensitive locations. However, a residual negative effect will remain given that the nature of the area will change significantly and permanently*".

1.30. With regard to "*landscape*" it is noted that "*Development at the M56 J9 employment area falls largely within the Red Sandstone Escarpment local character area (3a Appleton and Grappenhall). The character area covers a rather large amount of land, and so it has different features and sensitivities. Broadly, this area is reasonably well-wooded with a diversity of features in the landscape, including small ponds, ridges, knolls and incised stream valleys. The agricultural landscape including hedgerows appears generally well-maintained and the area presents an attractive rural quality. This area is however particularly sensitive to further building development. Development here would extend considerably into the countryside, though it would be bounded by the M6 to the east and the M56 to the south. A potential negative effect is predicted*". With regard to "*biodiversity and geodiversity*" It is noted that "*There are no designated wildlife sites within close proximity to the broad employment area at M56 J9. There are some pockets of*

woodland orchard within the area, but it is probable that these could be protected and/or enhanced through landscaping. Consequently, it is considered unlikely that there would be significant effects on important wildlife habitats".

1.31. For "*climate change and resource use*", it is noted that "*At the M65/J9, employment on its own would be unlikely to support a new energy network, but as part of a wider urban extension, there may be potential. At this stage, the effects are predicted to be neutral as there is no solid evidence to support a network*".

1.32. Below is the summary table of the employment location options.

Summary of appraisal findings

	Economy and regeneration	Health and wellbeing	Accessibility	Housing	Natural resources: Land resources	Natural resources: Water Quality	Natural Resources: Air Quality	Natural resources; resource efficiency	Natural resources: Flooding	Built Heritage	Landscape	Biodiversity and Geodiversity	Climate change and resource use
Option 1: M56 (J9)	✓✓✓	✓	?	-	✗✗	-	✗	✗	-	✗✗	✗✗	-	✗
Option 2: Waterfront	✓✓✓	✓ / ?	?	-	-	-	✗	✗	✗✗	-	✗	✗✗	✗
Option 3: Omega	✓✓✓	✓ / ?	?	-	-	-	✗	✗	-	-	? / ✗	-	✗
Option 4: Fiddlers Ferry	✓✓✓	✓	?	✓	✓	-	✗	✗	-	-	✓	✗✗	✗ / ✓
Option 5: Birchwood	✓✓✓	✓	?	-	✗✗✗	-	✗	✗	-	-	✗✗	✗✗	✗✗

Each of the broad employment areas is likely to have a significant positive effect upon the economy by supporting employment growth in areas that are attractive to business and / or could benefit communities of need. This ought to have knock-on benefits for health and wellbeing.

A neutral effect is predicted for all of the options with regards to water quality.

Options 1, 2 and 5 are likely to lead to a loss of best and most versatile agricultural land, but this is the most prominent for options 1 and 5.

Each option is predicted to have a minor negative effect on air quality, as employment growth is likely to contribute to increased car and HGV trips in close proximity to AQMAs and / or along busy routes.

A minor negative effect is predicted for resource use and efficiency, as employment growth will lead to an increase in the generation of waste. The exception is Option 4, which has some minor benefits with regards to the reuse of materials. Option 5 is also scored more negatively than all other options because it could have implications for peat resources.

Appendix H: Appraisal of Employment Locations

The effects on built heritage are significant for option 1, as the location involves several listed farmhouses and a scheduled monument. The effects for all other options are predicted to be less prominent.

The effects on landscape are also most prominent for option 1 and 5, which would involve greater intrusion into the countryside.

There are negative effects on biodiversity for options 2, 4 and 5. Whilst mitigation is a possibility, this could be more difficult for Option 2, which would heavily affect an existing local wildlife site. As such, significant effects are predicted. The potential for net gain exists for all of the options, but it is preferable to avoid impacts on existing sites, as such options 1 and 3 perform the best in this respect.

1.33. In light of this assessment, the SA (CD4.97) confirms in paragraph 5.3.9 that, "*with regards to the distribution of employment land, the Council have assessed a range of site options, and considers that two strategic sites should be brought forward to meet identified needs.*

- *Fiddlers Ferry should be the priority for additional employment given it is a brownfield site in need of remediation and redevelopment following the closure of the power station.*
- *A range of sites have been proposed at one strategic location to the South East of Warrington".*

1.34. The SA (CD4.97) therefore confirms that the sustainability of the Application Site was fully appraised as part of the Local Plan process and that it was included as one of two preferred strategic sites in Warrington (along with Fiddlers Ferry) to meet the employment needs identified.

Conclusion

1.35. The Application proposal has been fully assessed with regard to Climate Change and Energy. It incorporates a series of measures that would assist to minimise greenhouse gas emissions, including carbon dioxide and the impacts of climate change on the environment. These include the following:

- The sustainable location of the Site, close to a potential future workforce whilst also delivering a package of enhancement measures to encourage the use of sustainable modes of transport;
- The Site's location close to the strategic highway network;
- The excellent location to maximise the accessibility to a large catchment by electric delivery vehicles;

- Provision of EV charging points as part of the detailed design;
- Remediation of the Site and a cut and fill balance to create the development platforms at the construction stage by reusing material on-site and thereby reducing waste;
- Provision of a Sustainable Urban Drainage Systems on Site with an allowance for climate change;
- A suite of ecological mitigation (on-site and off-site), such as new planting and the creation of ponds to compensate the loss of habitats on Site, equating to up to 10% biodiversity net gain;
- Energy efficient measures and renewable and low carbon measures to be considered further at detailed design stage;
- Buildings built to BREEAM '*Excellent*' standard; and
- Warrington SA (CD4.97) consideration which demonstrates the suitability of the Site as an employment allocation in the emerging Local Plan in respect of the impacts on climate change and energy.

Appendix DR08 – Environmental Assessment Compliance Information (Environmental Statement Further Information Statement)

Langtree PP & Panattoni

Six 56 Warrington

Town and Country Planning (Environmental Impact Assessment) Regulations 2017:

Regulation 25 – Further Information and Evidence Relating to an Environmental Statement dated November 2021

This Statement is prepared in association with:

spawforths

AMION CONSULTING

CUNDALL

curtins

RIDGE

LAYER LANDSCAPE ARCHITECTURE

rps MAKING COMPLEX EASY

BWB

Patrick Stephenson Ltd
Agricultural Consultants

Tyler Grange

IEMA
Transforming the world to sustainability
- EIA -

SGP
Architects + Masterplanners

Report Author	Gavin Winter
Report Date	6th April 2023
Project No.	4055
Document Ref.	P4055-SPA-RP-TP-0036
Revision	C

Contents

1. Introduction

2. Conclusion

3. Appendices

Appendix 1 - Letter from Planning Inspectorate

Appendix 2 - Addendum to Environmental Statement Part 2 – Ecology Technical Paper 5

1. Introduction

1.1. This Statement provides a summary of further environmental information which is now being submitted to accompany the Environmental Statement and its Addendums originally prepared to support the outline planning application for a distribution and warehouse development (Use Class B8 with ancillary B1 (a) offices) and associated infrastructure at the Application Site referred to as Six 56 Warrington.

1.2. This Further Information Statement has been prepared in direct response to the Planning Inspectorate's letter dated 21st February 2023 (See Appendix 1) which raised three specific issues with regard to the Environmental Statement prepared in respect of the outline planning application described below (planning application ref no: 2019/34799) which is subject of the Secretary of State (SoS) Call In Inquiry (PINS reference: PCU/CONS/M0655/3298480).

The outline application (all matters reserved except for means of access) comprises the construction of up to 287,909m² (3,099,025ft²) (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. The PINS letter advises that following examination of the ES and relevant Addendums, the Applicant is required to supply the following further information to comply with Schedule 4 of the EIA Regulations (2017).

- "*Confirmation as to whether there are any additional proposed or consented developments that are likely to have a cumulative impact with the Proposed Development that have not been assessed in the ES, and if so, a revised cumulative effects assessment. Reason: The ES states that the developments to be considered within the cumulative effects assessment were agreed during the scoping process. The Scoping Opinion is dated April 2018. The ES addendums have provided updates to the information regarding the developments identified in the original ES. However, there is no confirmation as to whether any relevant other developments have been proposed or consented since the scoping process.*

- *Information that updates the baseline data for ecology or explains why the data in the ES is still considered representative of the current state of the environment and sufficient to support ES assessment conclusions. Reason: Significant time has elapsed since the submission of the most recent ecological survey (2020). This information is required to confirm that the relevant ES assessment conclusions remain valid.*

- *Information to explain whether there would be any likely significant effects on the environment resulting from the vulnerability of the project to risks from major accidents and/or disasters; and whether any likely significant effects on the environment could arise as a result of major accidents and/or disasters associated with the Proposed Development. Reason: The ES states at paragraphs 1.54 and 6.5 that this information will be provided, where relevant. However, there are no further reference to major accidents and/or disasters within the ES.*

- *If applicable, a revised non-technical summary (NTS) incorporating all of the elements referred to above*".

1.4. A letter prepared by Gateley Legal on behalf of the Applicant provided a formal response to the PINS letter dated 21st February 2023. Details contained in this letter are summarized in this Statement which provides the further environmental information to support Gateley Legal's response to the PINS letter.

Cumulative Effects Assessment

1.5. We have undertaken a review of the schemes that have been considered as part of the cumulative assessment to consider whether or not there are any further schemes that ought to be considered within the cumulative assessment. The Gateley letter confirms that there are no further planning applications or permissions that have been granted that would have a combined effect with the development. There are two projects in the locality where Environment Impact Assessment screening requests have been submitted to Warrington Borough Council. This included proposals for additional HGV parking at the existing Lymm Truck Stop adjacent to the M6 submitted on behalf of Moto Hospitality Ltd, which the Council confirmed in a Screening Opinion on December 2022 that that an EIA was not required for the development and an employment development of 176,518m² of use class B8 storage and distribution on land at Barleycastle Lane, Appleton submitted on behalf of Liberty Properties.

1.6. Proposals for the employment development (use class B8 storage and distribution) on land at Barleycastle is at a preliminary stage and no planning application has been made for this proposal, therefore there is limited information to make any assessment. It is not known whether a planning application will be made and hence at this stage there is a significant degree of

uncertainty about the details of this proposal, even if it does come forward. In this instance, the degree of information and certainty necessary to take account of this proposal within the Environmental Statement as a cumulative development does not exist. Gateley therefore conclude that there is no legal requirement to take this scheme into account. Notwithstanding this, Curtin's Consulting have already considered this employment land as part of their Transport Assessment submitted as part of their ES Part 2 Traffic and Transport Technical Paper, which utilised the Council's Warrington Multi Modal Transport Model (WMMTM). The WMMTM considered the wider highway network, including the emerging Local Plan allocations which included the Liberty Properties owned land, which forms part of the South East Warrington Employment Area (Policy MD6 of the Updated Proposed Submission Version Local Plan (UPSVLP) 2021). In conclusion we consider the original Transport Assessment already considers the cumulative impacts of this land.

1.7. Since the issue of the Gateley letter to PINS on the 21st February 2023, an outline planning application for extensions to Lymm Poplar 2000 Services has been submitted to Warrington Borough Council (planning application ref: 2023/00142/OUTM).

1.8. This section now gives further consideration to the interaction and synergistic effects and cumulative impacts of this proposed Services development together with the Six 56 proposal and provides an assessment of the relevant environmental impacts.

1.9. The full description of this planning application is detailed below:

"Outline application for extension and conversion of existing Services to create Motorway Service Area off M56 and retained Truck Stop off M6, with works

comprising demolition of truck wash; part removal of canopy to truck filling station; reconfiguration and extension of car parking (to provide up to 628 spaces), new coach parking (to provide up to 13 spaces), and caravan parking (to provide up to 17 spaces); extension of HGV parking layout (to provide up to 368 spaces); new service yard to amenity building; landscaping, infrastructure and ancillary works".

1.10. The site is located close to junction 20 of the M6 and junction 9 of the M56 on land to the north of the intersection of the M6 and M56 on the opposite side of M6 to the proposed Six 56 development.

Figure 1: Location Plan

1.11. It is understood that Moto Hospitality Ltd intends to extend the existing services, which are currently signed on all approaches as a Truck Stop, into a formal MSA serving the M56 and an extended truck stop serving the M6.

1.12. The proposed development includes the reconfiguration and extension of the car parking to provide up to 628 car parking spaces, including 29 accessible spaces and 50 electric car charging points; new dedicated coach parking of 13 spaces; 17 new caravan parking spaces; the extension to HGV parking to

provide up to 368 spaces; new landscaping; demolition of existing Truck Wash facility; and reconfiguration of HGV Fuel Filling Station.

1.13. The main physical alteration to the site concerns the extension of the Services into the adjacent field to the north-east, which is the furthest point from the Six 56 proposed development site and is to the rear of the Truck Stop Amenity building. The existing access arrangements to the site from Cliff Lane (A50) will be unchanged. A Proposed Site Plan is shown at Figure 2.

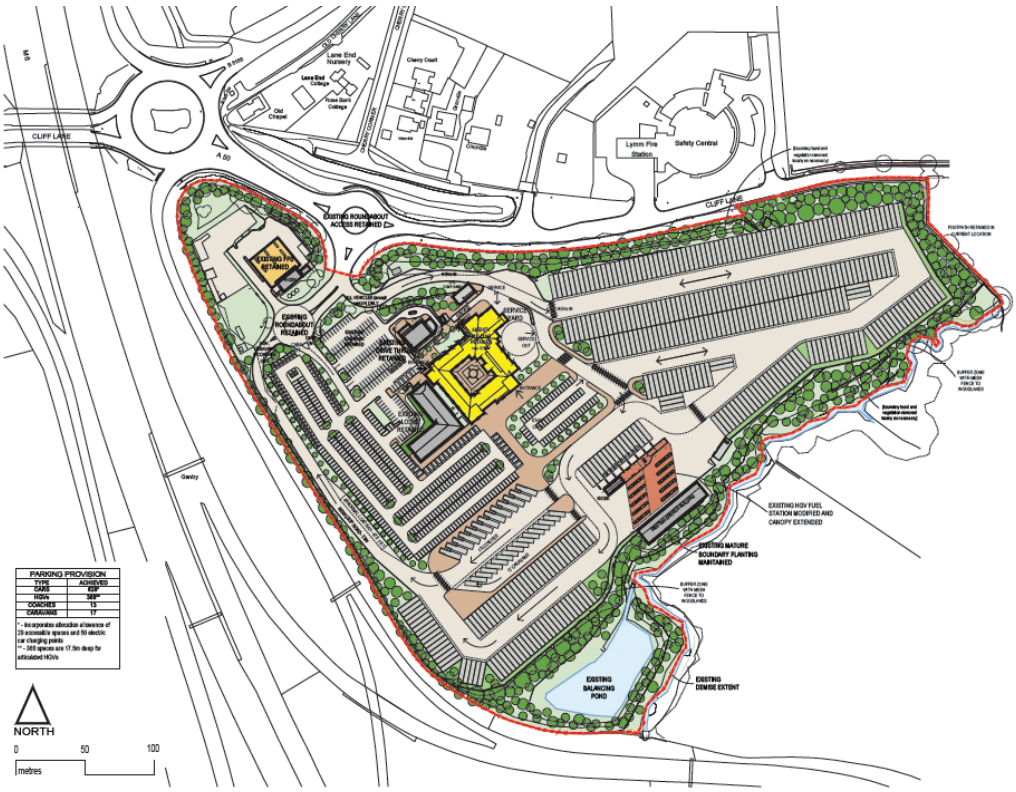


Figure 2: Proposed Site Plan

1.14. This section provides a summary of the relevant cumulative effects associated with this site in terms traffic and transportation, landscape and visual impact and ecology and nature conservation. We do not consider there are any other potential cumulative effects associated with any other environmental effects.

Traffic and Transport

1.15. Curtins Consulting has undertaken a review of the Transport Assessment (TA) dated January 2023 prepared by Croft Eddisons on behalf of the applicant and this appears to suggest that there will be an increase of circa 312 general parking spaces and circa 68 HGV parking spaces. Traffic generation has been calculated using these figures and the TA states that: 'During pre-application discussions, it was proposed to apply a pro-rata increase in trips at the site based on the proportional increase in car parking spaces on the site.' This methodology results in circa 564 two-way additional trips in the AM peak period and circa 425 two-way trips in the PM peak period.

1.16. The TA contains 2025 and 2038 capacity assessments at the M6 Junction 20 both with and without the additional traffic. The TA concludes that the traffic impact of the proposals is not considered severe, and no highway mitigation is proposed. There is reference to the Six 56 mitigation at the M6 Junction 20 but the TA does not assess this or commit to delivery of a comparable or enhanced scheme.

1.17. It is understood from a National Highways (NH) response dated 10th March 2023, that NH have raised 11 matters that need to be resolved prior to determination. Some of the comments relate to the actual principle of the development as per the below comment:

'The proposed signing strategy suggests designating the site as a Motorway Service Area (MSA) from the M56, but as a Truck Stop from the M6. National Highways do not support this approach as the site cannot have dual status. Furthermore, if the site is to be considered as an MSA in its own right, this will have implications for the signing agreement between the Lymm site and Knutsford roadside facility, which would need to be amended to the status of "Motorway Rest Area", as the Knutsford site does not

meet the requirements to be considered an MSA (as set out in DfT Circular 01/2022) in its own right.'

1.18. Other comments are more technical in nature, but these still raise serious concerns such as the comment reproduced below:

'Large impacts are noted on the M6 Southbound Off-slip, with the "with development" scenario resulting in queues extending back to the M6 mainline which would present an unacceptable safety impact that would require mitigation'.

1.19. NH conclude that no decision should be made until the 15th June 2023.

1.20. A response from WBC Highways dated the 28th March 2023, also raises a number of questions with regard to the principle of the development, as per the below extract:

> *'National Highways (NH) who are the Highway Authority for the strategic road network provide specific guidance on roadside facilities in the Department for Transport Circular 01/2022: Strategic Road Network and the Delivery of Sustainable Development (the circular). Section 2 of this TA references the circular and implies that the proposals would fulfil an additional need for a signed motorway service area (MSA), however, it fails to reference para 76 of the circular which states that the maximum distance between MSAs should be 28 miles.'*
>
> *Five other MSAs in the vicinity are listed and it is clear that all lie within 28 miles; the furthest being 23 miles to the north. This list does not take account of the proposed MSA at M62 J11 which has outline consent under 2019/35726 granted following a Public Inquiry held in March 2022 and is approximately 8 miles away. This MSA will provide an additional 105 HGV parking spaces.*

Given that the development site already exists as a designated Truck Stop the justification of the need for the proposal is questionable. Reference is made that increased lorry parking will help to tackle issues of illegal and inappropriate lorry parking but no evidence is provided as to where these issues exist.'

1.21. The response goes on to suggest that the car parking figures may have been artificially inflated to demonstrate a requirement for the development proposals and the HGV parking survey is inaccurate and possibly inflated to demonstrate a need for the proposals. The same point regarding the duality of both an MSA and truck stop, as raised by NH, is also made.

1.22. In addition to the comments regarding the principle of development, WBC raise technical issues regarding key assessment parameters. These includes trip generation, trip distribution, traffic growth, parking survey data, accident data and the accessibility of the site.

1.23. The WBC response concludes that *'Until the issues highlighted above are addressed there is no support for the proposal and an objection is raised.'*

1.24. Based on the information available at the time of writing, and the NH/WBC responses, Curtins Consulting is of the view that the highways effects of the proposed Moto Hospitality Ltd development are entirely uncertain, and it is entirely unclear what, if any mitigation might be proposed. It is therefore impossible to accurately predict or assess the cumulative effect at this stage. The objections of National Highways and Warrington Borough Council's Highways Officer explicitly highlight the problems and difficulties with the data that has been submitted by the Applicant. To try and cumulatively assess the effect of this development would amount to no more than conjecture and therefore it is simply not possible to carry out a cumulative assessment of this

development. It is therefore impossible to accurately predict or assess cumulative effects at this stage due to the defects in the baseline highways information and analysis presented in the application documents.

Landscape and Visual Impact

1.25. TPM Landscape Consultants have considered the cumulative impacts of the proposals to extend Lymm Services. TPM confirm that there is no intervisibility with the existing Lymm services site and none expected to be created through the combination of the proposals at the Six56 site. There is a low possibility of construction cranes and other high level construction features becoming visible between sites but the existing vegetation around the services should provide full screen cover at the operational stages of both projects. The landscape effects of the proposed Lymm services appears low as this is largely an existing developed site, therefore the cumulative effects are Negligible-None.

Ecology and Nature Conservation

1.26. The updated Addendum Ecology and Nature Conservation ES Technical Paper has considered the outline planning application for the extension and conversion of existing Services to create Motorway Service Area and it confirms that extensions to this existing development will not incur any additional impacts on the receptors considered in the Addendum Technical Paper.

1.27. We do not consider there are any further cumulative impacts in respect of any other technical topics assessed as part of the ES.

Updates to Baseline Data for Ecology

1.28. Further information has been prepared to update the ecological baseline data for the Application proposal (Six56 Warrington), given the time that has elapsed

since the submission of the last ecological survey information undertaken in 2020. In accordance Regulation 25 of the EIA Regulations further information has now been submitted in the form of an Addendum to the Ecology and Nature Conservation ES Technical Paper. This Addendum document is appended to Appendix 2 of this Further Information Statement,

1.29. The Ecology and Nature Conservation Addendum document now provides an updated Extended Phase 1 Habitats Survey, Badger Survey and Preliminary Bat Roost Assessment Survey of buildings / trees. These updated assessments confirm the condition of habitats on Site, and the potential for protected species. The conclusions are that the conditions on Site remain unchanged since the earlier Phase 1 surveys were undertaken. Therefore, the environmental impacts, mitigation, residual effects and conclusions reported in the ES Addendum Ecology and Nature Conservation Technical Paper all remain valid.

Updates to Socio-economic Baseline Data

1.30. A Socio-economic Benefits Report has been prepared by Amion Consulting to accompany the Planning Proof of Evidence to be considered at the Call In Inquiry. This evaluates the potential socio-economic effects of the proposed Warrington Six 56 development and draws upon the assessment previously reported within the Part 2 Socio-economic Technical Addendum Paper submitted with the Environmental Statement (ES) in support of the planning application.

1.31. This updated Benefits Report has had regard to an assessment of employment land need for Warrington over the Local Plan period prepared by Iceni Projects Limited in their Need for Employment Land Proof of Evidence and updated market analysis undertaken by JLL in their Demand for Employment Land Proof

of Evidence. Assumptions have been reviewed and revised where appropriate to reflect updated conditions and supplementary information.

1.32. The ES Part 2 Socio-economic Addendum Technical Paper estimated that the proposed development would support 4,113 gross direct FTE jobs, resulting in a net additional employment impact of 1,990 FTE jobs at the Warrington level and 2,342 FTE jobs at the Cheshire and Warrington LEP level. As this exceeded a net increase of 1,000 FTE jobs at the LEP level, it was assessed within the Addendum Technical Paper to be of a substantial positive magnitude.

1.33. The assessment of gross employment effects outlined in the Addendum Paper has now been reviewed in light of comparator evidence, alongside the review of potential effects associated with the adoption of new technologies and automation. While recognizing that levels of activity – both in terms of job numbers and labour market requirements - are highly variable, it is considered that this estimate is at the upper end of the range for gross direct employment. On this basis, further analysis has been carried out to inform an appraisal of the potential employment effects. This includes a scenario which applies a density of 80 sq m (GEA) per FTE employee and a scenario which allows for increased automation in the logistics sector over a ten year period and a 15% reduction in staffing levels across the proposed development. Table 1 over the page sets out the variable range of jobs that could be generated when applying these scenarios.

1.34. Nevertheless, this updated assessment still confirms that the net additional employment impacts at the Warrington and LEP level and GVA estimates are still expected to be of a substantial positive magnitude, consistent with the level of impact presented in the ES Addendum Technical Paper.

Table 1: Operational phase employment			
	ES Addendum Technical Paper	**Reduced density80 sqm per FTE**	**Reduced density and 15% automation adjustment**
Warrington Level			
Gross operational jobs (FTE)			
Direct	4,113	3,599	3,129
Net additional jobs	1,326	1,161	1,009
Cheshire & Warrington LEP Level			
Gross operational jobs (FTE)			
Direct	4,113	3,599	3,129
Net additional jobs	1,441	1,261	1,097

Major Accidents and / or disasters associated with the Proposed Development

1.35. Having regard to paragraph 8 of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Gateley have confirmed the development itself is a B8 logistics and warehousing development and is not

a source of hazard that could result in a major accident or disaster. They also confirm that it is not vulnerable to major accidents or disasters. The development does not interact with any external sources of hazard and there are no identified nearby external sources of hazard which could impact or interact with the development so as to result in likely significant effects on the environment. There is therefore no likelihood of any significant effects and therefore the topic does not need to be considered further within the Environmental Statement.

2. Conclusion

2.1. This Further Information Statement and the supporting Ecology and Nature Conservation ES Technical Paper Addendum prepared by Tyler Grange constitutes an Addendum to the Environmental Statement submitted to the Local Planning Authority with the Outline Planning Application.

2.2. This Statement confirms there are no further cumulative impacts and the proposed development is not a source of hazard that could result in a major accident or disaster.

2.3. The Addendum is solely related to ecological matters and hence relates to the Ecology and Nature Conservation ES Technical Paper. It has been prepared to provide an update to the ecological baseline data. An updated Extended Phase 1 Habitat Survey, Badger Survey and Preliminary Bat Roost Assessment Survey of buildings / trees has been undertaken on Site in March 2023. These updated surveys confirm the distribution and condition of habitats on Site and potential for protected species, remains unchanged since the initial Phase I surveys were undertaken and therefore that the original environmental impacts, mitigation and residual effects and conclusions reported in the last ES Addendum Ecology and Nature Conservation Technical Paper all remain valid.

2.4. There are also no amendments or changes to the original project description, environmental impacts, mitigation and residual effects and conclusions reported in the ES Part 1 Report which all remain valid. This Further Information Statement should therefore be read in conjunction with the original ES submitted to WBC in April 2019 and First and Second Addendums dated October 2020 and November 2021 (as there are no changes to the significance of impacts assessed and reported in the Part 2 Technical Papers).

3. Appendices

Appendix I

The Planning Inspectorate

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services: 0303 444 5000
e-mail: Environmentalservices@planninginspectorate.gov.uk

Gateley Legal

Sent by email:
andrew.piatt@gateleylegal.com

Your Ref:

Our Ref: APP/M0655/V/22/3311877

Date: 08 February 2023

Dear Sir/Madam

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 ('THE EIA REGULATIONS')

Application by: Langtree PP & Panattoni

Site Address: Land at Bradley Hall Farm, Grappenhall Lane , Grappenhall, Warrington

We refer to the above application which commenced on 14 December 2022.

The development proposed consists of an outline application (all matters reserved except for means of access) comprises the construction of up to 287,909m² (3,099,025ft2) (gross internal) of employment floorspace (Use Class B8 and B1(a) offices) 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. By virtue of Regulation 5 of the EIA Regulations the development proposed is EIA development.

The content of the Environmental Statement (ES) accompanying the planning application that is the subject of the above application has been considered, having regard to Regulation 2(1) and Schedule 4 of the EIA Regulations.

Following examination of the ES, the Secretary of State notifies you by this letter, pursuant to Regulation 25 of the EIA Regulations, that, to comply with Schedule 4 of those regulations (Information for inclusion in environmental statements) the Applicant is required to supply the following further information:

- Confirmation as to whether there are any additional proposed or consented developments that are likely to have a cumulative impact with the Proposed Development that have not been assessed in the ES, and if so, a revised

disability confident EMPLOYER

cumulative effects assessment. **Reason:** The ES states that the developments to be considered within the cumulative effects assessment were agreed during the scoping process. The Scoping Opinion is dated April 2018. The ES addendums have provided updates to the information regarding the developments identified in the original ES. However, there is no confirmation as to whether any relevant other developments have been proposed or consented since the scoping process.

- Information that updates the baseline data for ecology or explains why the data in the ES is still considered representative of the current state of the environment and sufficient to support ES assessment conclusions. **Reason:** Significant time has elapsed since the submission of the most recent ecological survey (2020). This information is required to confirm that the relevant ES assessment conclusions remain valid.

- Information to explain whether there would be any likely significant effects on the environment resulting from the vulnerability of the project to risks from major accidents and/or disasters; and whether any likely significant effects on the environment could arise as a result of major accidents and/or disasters associated with the Proposed Development. **Reason:** The ES states at paragraphs 1.54 and 6.5 that this information will be provided, where relevant. However, there are no further reference to major accidents and/or disasters within the ES.

- If applicable, a revised non-technical summary (NTS) incorporating all of the elements referred to above.

We would draw your attention to court cases which have stressed the need for all the relevant environmental information in an ES to be comprehensive and easily accessible.

You can access Regulation 25 of the EIA Regulations at the following direct link: http://www.legislation.gov.uk/uksi/2017/571/regulation/25/made

Although it is not a statutory requirement, in the interests of transparency and openness the Applicant may wish to publicise the availability of the further information in accordance with Regulations 25(3), 25(4) and 25(8) of the EIA Regulations. Please can you advise the local planning authority if the further information is publicised.

We would be grateful if you could inform us, **within 2 weeks** of the date of this letter, how long you anticipate it will take to prepare this further information, so that an expected submission date can be identified. Please send your response for the attention of the Environmental Services Team using the contact details at the head of this letter.

In order to support the smooth facilitation of our service we strongly advise that you correspond via the email address at the head of this letter rather than by post.

A copy of this letter has been sent by email to Warrington Borough Council.

Yours faithfully,

David Price

https://acp.planninginspectorate.gov.uk/
https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices

disability confident EMPLOYER

David Price
Head of Operations Group 3
(Signed with the authority of the Secretary of State)

Cc: Mr Philip Axford (Warrington Borough Council)

Where applicable, you can use the internet to submit documents, to see information and to check the progress of cases through the Planning Portal. The address of our search page is:
https://acp.planninginspectorate.gov.uk/

Appendix 2

Langtree PP and Panattoni

Six 56 Warrington

Addendum to Environmental Statement

Part 2 – Ecology Technical Paper 5

March 2023

Revision Record

Revision Reference	Date of Revision	Nature of Revision	Author	Checked By
First Draft	14.03.2023	-	Joseph Dance	John Moorcroft
Second Draft	30.03.2023	Inclusion of desk study data	Joseph Dance	John Moorcroft
Final	30.03.2023	Confirmation of survey methodologies	Joseph Dance	John Moorcroft

Report Author	Joseph Dance
Report Date	30.03.2023
Project No.	10682
Document Ref.	R06
Revision	Final

Contents

Introduction

2. Documents Consulted

3. Consultations

4. Methodology and Approach

Baseline Methodology
Receptors and Environmental Impacts
Significant Effects and Impact Prediction Confidence
Assumptions / Limitations

5. Baseline Information

6. Alternatives Considered

7. Potential Environmental Effects

Construction Phase
Operational Phase

8. Proposed Mitigation

Construction Phase
Operational Phase

9. Potential Residual Effects

10. Additive Impacts (Cumulative Impacts and their Effects)

11. Conclusion

Tables and Figures:

Table 3.1 – Protected and Priority Species Summary

Fig 5.1 – Habitat Features Plan

Appendices

Appendix 5.7 – Desk Study Data

Introduction

1.1. This addendum document has been prepared by Tyler Grange Group Ltd. (TG) on behalf of Langtree PP and Panattoni for the Six 56 development and should be read in conjunction with Tyler Grange's previous Addendum Paper to the Environmental Statement Rev F dated June 2020.

1.2. This document has been prepared in direct response to the Planning Inspectorate's letter dated 21st February 2023 which raised specific issues with regard to the Environmental Statement prepared in respect of the outline planning application described below (planning application ref no: 2019/34799) which is subject of the Secretary of State (SoS) Call In Inquiry (PINS reference: PCU/CONS/M0655/3298480):

"The outline application (all matters reserved except for means of access) comprises the construction of up to 287,909m² (3,099,025ft2) (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. The scheme and project description above has not been amended or subject to change since the last ES Addendum.

1.4. The PINS letter advises that following examination of the ES and relevant Addendums, the Applicant is required to supply the following further ecological information to comply with Schedule 4 of the EIA Regulations (2017):

"Information that updates the baseline data for ecology or explains why the data in the ES is still considered representative of the current state of the environment and sufficient to support ES assessment conclusions. Reason: Significant time has elapsed since the submission of the most recent ecological survey (2020). This information is required to confirm that the relevant ES assessment conclusions remain valid."

1.5. This Addendum document now provides relevant updates to the baseline ecological data, based on an updated Extended Phase One Habitat Survey, Badger Survey and Preliminary Roost Assessment Survey of buildings/trees undertaken by TG in March 2023 (see Methodology). It also includes an updated desk study analysis, completed in March 2023, which comprised the acquisition of up-to-date ecological records within a 2km radius around the site to ascertain if the previous assessments remain valid.

1.6. The results of the updated surveys and desk assessment completed by TG in March 2023 confirm that the type and distribution of habitats within the site remain unchanged. The buildings/trees previously assessed are unchanged in their suitability for roosting bats, and the distribution of badgers within the site is also unchanged. The desk study data also failed to reveal any notable difference in the general distribution and known presence of protected/priority species in the area. The existing ES is, therefore, considered to be representative of the current state of the site in terms of its habitat distribution and importance to protected/notable species.

1.7. The magnitude of expected impacts and proposed mitigation strategy put forward in the latest ES Addendum are, therefore, still considered valid and appropriate.

2. Documents Consulted

2.1. The original documents consulted as part of the previous ES Addendum in June 2020 were consulted.

3. Consultations

3.1. No further consultations were undertaken as part of the preparation of this Addendum Paper.

4. Methodology and Approach

Baseline Methodology

Study Area

4.1. The study area remains the same as previously considered in the previous June 2020 ES Addendum.

Data Search

4.2. An updated data search was completed in March 2023, which comprised the acquisition of records of protected and priority species within 2km of the site boundary. The data was supplied by the Local Record Centre, rECOrd, on the 24th of March 2023.

4.3. In addition to this, a review of the MAGIC website was undertaken in March 2023 to determine if any additional statutory nature conservation sites are present in 2023 when compared to those reported in the previous ES Addendum in June 2023. Warrington's Draft Local Plan was also interrogated to determine if any additional non-statutory nature conservation sites are present.

Extended Phase 1 Habitat Survey

4.4. An extended Phase 1 habitat survey was undertaken on 17th November 2016 by Paul Moody and Hayley Care and additional survey undertaken on 14th December 2018 by Joseph Dance, all experienced ecologists and members of the Chartered Institute of Ecology and Environmental Management (CIEEM), following published guidance (JNCC, 2010). This method of survey entails recording the main plant species and classifying / mapping broad habitat types present, as well as assessing the potential for legally protected or otherwise

notable species to occur within and adjacent to the site. The weather conditions during the survey was cold (5°C), with blustery winds and heavy rain for a portion of the survey.

4.5. An update walkover survey was undertaken on 19th February 2020 by Laura Dennis, an experienced ecologist and graduate member of CIEEM, to confirm the distribution and condition of habitats on site, and potential for protected species, remains unchanged since the initial Phase I surveys, to inform the ES addendum.

4.6. The extended Phase I habitat survey was repeated in March 2023 by Sophie Kirk, an experienced ecologist, to confirm the distribution and condition of habitats on site, and potential for protected species, remains unchanged since the initial Phase I surveys, to inform the ES addendum.

4.7. Flora names provided in habitat descriptions use common names and follow those provided in New Flora of the British Isles 2nd Edition (Stace, 1997).

Detailed Surveys

4.8. The following detailed surveys were also completed at the same time as the Extended Phase One Habitat Survey:

- Badger Survey (utilising same methodology as reported in **Appendix 5.1** of the original ES);
- Preliminary Roost Assessment Survey of buildings and trees (utilising same methodology as reported in **Appendix 5.2** of the original ES);

Receptors and Environmental Impacts

4.9. The receptors considered and methodology/framework for assessing the magnitude of environmental impacts remain unchanged since the previous Addendum Paper (June 2020).

Significant Effects and Impact Prediction Confidence

4.10. The criteria for assessing the significance of effects and predicting impacts remains unchanged from the previous Addendum Paper.

Assumptions / Limitations

4.11. The updated Extended Phase One Habitat Survey was undertaken in March 2023, which is considered sub-optimal for undertaking such surveys as not all plants are in flower/visible at this point. However, given the type of habitats concerned (i.e. arable/pasture mainly) and the amount of data gathered and continuously reviewed during the extensive survey work previously completed, this is not considered a limitation and does not change the conclusions made in this Addendum document.

5. Baseline Information

Protected Sites

5.1. The protected statutory and non-statutory nature conservation sites identified within the Zone of Influence remain unchanged in terms of their designation and distance to the site since reported in the previous Addendum.

Habitats

5.2. The habitats within the site and their condition in relation to Biodiversity Net Gain remain largely unchanged since reported in the previous ES Addendum. The habitats also remain unchanged in terms of their level of importance as reported in the previous ES Addendum.

5.3. The only notable and expected change is the marginal encroachment of scrub and ruderal vegetation within the main block of woodland in the south-east of the site and along Bradley Brook and along the ditches. The locations of these changes are highlighted in an amended Habitat Features Plan (**Figure 5.1**) appended to this note – referenced as Target Note TN01. A new small temporary animal storage unit has also been constructed between Building B06 and Building B12. It is constructed of open wooden slats and a slanted sheet metal roof. It is considered to be of **negligible potential** for supporting bats and is of **negligible ecological importance** (also having 0 biodiversity value within the Biodiversity Metric), so does not alter the overall conclusions and assessments made regarding habitats/mitigation. The location of this building is shown on the amended Habitat Features Plan as Target Note TN02 (**Figure 5.1**).

5.4. Pond 11 was noted to be dry. It is a seasonal field depression and is consistent with the description reported in the previous Great Crested Newt (GCN) appendix (**Appendix 5.5** of original ES. The following section provides an updated description of the habitats within the site.

Arable Land

5.5. The northern most fields (fields F1 to F3) are currently used for arable crop production (see Photograph 5.1). A small parcel of the same habitat type is also present to the north of Grappenhall Lane (B5356).

5.6. Arable fields are monocultures and are of generally little ecological value and are of **negligible ecological importance**, although they can provide foraging habitat for wintering birds. This is evaluated separately under the protected species heading below.

Photograph 5.1: view of arable fields looking east.

Buildings and Hardstanding

5.7. A farm complex is present at the centre of the site, which comprises one dwelling (Bradley Hall Farmhouse) and agricultural buildings, with associated hard standing and small private gardens.

5.8. The building and hard standing have no inherent value and are of **negligible ecological importance**. However, they may have importance in relation to bats and barn owl and are considered separately in relation to these species below.

5.9. During the 2023 update, an additional building (listed as Building B12) was located within the site and is shown below in Photograph **5.2**. It is a livestock shelter and has negligible potential to support roosting bats.

Photograph 5.2 – Building B12

Grassland (improved pasture)

5.10. Most of the site consists of fields of improved pasture (see Photograph 5.3). A range of common grasses are present including, perennial-rye grass *Lolium perenne*, Yorkshire fog *Holcus lanatus*, red fescue *Festuca rubra*, cock's foot *Dactylis glomerata* and red fescue *Festuca rubra*. Common agricultural weeds were present, particularly around the sites margins, species present common

nettle *Urtica dioica*, common cleavers *Gallium aparine*, curly-leaved dock *Rumex crispus*, cow parsley *Anthriscus sylvestris*, stitchwort *Stellaria sp* and creeping thistle *Cirsium arvense*.

5.11. The fields are used both for cattle and sheep grazing. The species composition of the swards is similar in fields grazed by cattle and sheep, however the sward within cattle grazed fields was longer with an increased dominance of perennial-rye grass. The sward in sheep grazed fields is shorter with a reduced dominance of perennial-rye grass and an increase in species such as red fescue.

5.12. A small strip of this habitat type is also present between Grappenhall Lane and the strip of broadleaved screen planting.

5.13. The improved pasture is generally species poor and is a common and widespread resource of little intrinsic ecological value. For this reason, it is considered to be of **negligible ecological importance** only.

Photograph 5.3: Improved pasture present within the site.

Hedgerows and Scattered Trees

5.14. The site and field units are predominantly bound by hedges, some with mature and semi-mature trees. The hedgerows are predominantly species poor hawthorn *Crataegus monogyna* hedgerows which are flail cut. Ground flora at

the time of survey was limited to common agricultural weeds present within the fields margins; however, this is expected due to the time of year that the survey was conducted, and the ground flora could be notably more diverse during late spring and summer.

5.15. Hedgerows present in the north east of the site, as well as along Bradley Brook are considerably more species diverse and may be classed as being important if assessed against the Hedgerows Regulations 1997.

5.16. The hedgerows provide a network of habitat around the site and to and from the wider area. The majority of hedgerows are considered to be of **local ecological importance**.

Ponds

5.17. A total of 12 ponds are present within the site, see **Appendix 5.7**, these are predominantly field ponds with associated scrub, but two woodland ponds are also present within the site. Further information about the ponds, including descriptions, is given in **Appendix 5.5**.

5.18. Ponds present within the site are considered to be of **local ecological importance** as they provide habitat diversity and potentially habitat for amphibians, including great crested newt (GCN) *Triturus cristatus*. If during future surveys the ponds are found to contain important species (such as GCN) or important species assemblages, this value may need to be reassessed and increased.

5.19. Pond P11 was noted to be dry during the March 2023 update survey.

Scattered Trees and Scrub

5.20. Two tree lines are present within the north west of the site these consisted of semi-mature to mature specimens of pedunculate oak, hawthorn, ash and horse chestnut *Aesculus hippocastanum*.

5.21. Several mature trees are present within the site; these are mostly associated with hedgerows or the Bradley Brook Corridor. Species present were predominantly pedunculate oak *Quercus robur* but other species including ash Fraxinus excelsior and alder *Alnus glutinosa* were also present.

5.22. Some small areas of scrub are present within the site, these are associated with ponds and other unmanaged areas of the site, such as meanders in Bradley Brook. Species present included hawthorn, alder and willow *Salix sp*.

5.23. The dense scrub and scattered trees cannot be reproduced in the short-medium term and are considered to be of **site ecological importance**.

Tall Ruderal

5.24. Small unmanaged areas within fields are dominated by ruderal species such as common nettle *Urtica dioica*, greater willow herb *Epilobium hirsutum*, cow parsley *Anthriscus sylvestris*, red campion *Silene dioica* and other species such as male fern *Dryopteris filix-mas* and read canary grass *Phalaris arundinacea*. A thin strip of this habitat type comprising nettle is present between the strip of broadleaved plantation and the road in the far north of the site.

5.25. During the 2023 update survey, ruderal vegetation was noted to be denser in coverage along the Bradley Brook corridor.

5.26. The areas of ruderal are small in area and consist of common and widespread species they are considered to be of **site ecological importance**.

Watercourses

5.27. Bradley Brook flows in a west – east direction along the southern boundary of the site, before entering in the south-eastern corner of the site. Bradley Brook is a small stream as it runs adjacent to and through the site (see Photograph 5.4).

5.28. The channel of Bradley Brook is approximately 1m wide and 0.5 m deep, with a water depth of approximately 10 – 20 cm. The brook was fast flowing at the time of survey and has a silt a pebble substrate. This section of the Brook is heavily shaded either by adjacent hedgerows or by trees.

5.29. Bradley Brook, provides habitat connectivity along the south of the site as well as habitat for a range of faunal groups, potentially including: aquatic invertebrates, feeding opportunities for birds (potentially including kingfisher) and may also provide a food resource for bats. As such it is considered to be of **local ecological importance**.

5.30. Three ditches (D1 – D3 on Plan 10682/P01b, see **Appendix 5.7**) are present within the site, these are field drains which were heavily shaded by trees or hedgerows, these channels were approximately 1m wide and 0.8m deep and held little water at the time of survey, with only small puddles being present (see Photograph 5.4).

5.31. The ditches present within the site are heavily shaded and were almost dry at the time of survey and do not provide the same level of habitat diversity or extent as Bradley Brook They do however contribute (together with their associated features such as hedgerows and trees) towards providing a network of habitats around the site. They are therefore considered to be of **site ecological importance**.

Photograph 5.4: Bradley Brook as it flows through the site.

Photograph 5.5: Ditch (D3) present to the north west of the site.

Woodland (semi-natural broad-leaved)

5.32. Two areas of semi-natural broad-leaved woodland are present within the site, Bradley Gorse and Wright's Covert.

5.33. The woodland consisted predominantly of semi-mature specimens included pedunculate oak *Quercus robur*, sycamore *Acer pseudoplatanus*, silver birch Betula pendula, willow *Salix sp*, alder *Alnus glutinosa*.

5.34. The understory was underdeveloped but species such as holly *Ilex aquifolium*, hawthorn, and dog rose *Rosa canina* were present. Large areas of the understory of Bradley Gorse are dominated by Rhododendron *Rhododendron ponticum* (see Photograph 5.6). This species is listed as an invasive species within schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and it is illegal to cause its spread in the wild.

Photograph 5.6: Bradley Gorse showing Rhododendron colonisation

5.35. Ground flora was limited at the time of survey and predominantly consisted of cleavers *Gallium aparine*, common nettle, bramble *Rubus fruticosus* and red campion. Additional scrub encroachment was noted within the woodland during the 2023 update survey.

5.36. The woodland is an important ecological resource which cannot be replaced in the short term; it provides structural diversity and habitat for a range of species including birds, invertebrates, amphibians including GCN and mammals including badger.

Woodland (broad-leaved plantation)

5.37. A thin strip of this habitat type is present on the corner of Grappenhall Lane and Cliff Lane between the roundabout and the adjacent arable field. At the time of the survey, ground flora was limited and comprised pockets of bramble, fescues Festuca sp., cleaver's, sphagnum moss, dog rose *Rosa canina*, broad-leaved dock, dove's-foot crane's bill *Geranium molle*, wood avens *Geum urbanum*, creeping thistle, ivy and hedge bindweed *Calystegia sepium*.

5.38. The tree species within this area comprised early-mature specimens of pedunculate oak, ash, silver birch, sycamore, hazel, horse chestnut, Prunus sp. and holly saplings. Scrubby species across the woodland also comprised hawthorn and elder.

5.39. Taking into account the above, the woodlands (semi-natural and plantation) on site are considered collectively to be of **local ecological importance**.

Photograph 5.7: Broadleaved plantation

Habitats on Adjacent Land

5.40. Habitats on adjacent land were not accessible, however based on what can be viewed from aerial photography and what could be seen from public rights of way a brief description is provided below:

5.41. The site is bounded to the north by the B5356 (considered to be of negligible ecological importance) beyond which lies further arable fields. To the east the site is bound by the M6 motorway. To the south of the site are areas of arable fields (considered to be of negligible ecological importance) and hedgerows. The west of the site is bounded by an industrial estate.

5.42. There are also nine ponds on adjacent land which lie within 250m of the site.

Protected and Priority Species

5.43. **Table 3.1** below summarises an update assessment regarding the baseline value of the site in relation to protected and priority species

Protected/Priority Species	ES Addendum 2020 Description	2023 Update	Importance	Appendix (2020 Addendum)
Badger	Two partially-used outlier setts dug into banks along watercourse which runs along southern boundary. One disused outlier sett present in Bradley Gorse. Fields and associated margins likely to provide foraging habitat. At the time of the update Phase I survey (February 2020) evidence of continued use by rabbits (hair, droppings) and no evidence of recent badger activity in or around the two partially-used outlier setts. The sett in Bradley Gorse remains disused.	There continues to be a large amount of rabbit/hare activity. Numerous rabbit/hare burrows are present along Bradley Brook. The setts previously located were found to be disused at the time of the 2023 survey. No fresh latrines/hairs or obvious snuffle holes were observed, and no defined badger/mammal runs were noted across the fields. The desk study returned additional records of badger beyond those previously reported, which comprised a combination of field signs, road traffic incidents and active/inactive setts. Given the known presence of this species in the area and specific site survey completed in 2023, the	Negligible	Appendix 5.1

		additional records are not considered to constitute any alterations to the assessments previously made. **Considered unchanged in status and importance since 2020 ES Addendum.**		
Bats	Several day roosts of common bat species; common and soprano pipistrelle and Myotis species bats (likely Brandt's) recorded in buildings B5, B6 (proposed for demolition) and B12. Potential roost features identified in mature trees. Woodland edges watercourses, hedges and ponds used as foraging and commuting habitat for a range of common pipistrelle, myotis species noctule and brown long-eared bat.	All buildings and trees within the site were noted to be unchanged in their form and condition since previous inspection in 2020. All were assessed as providing the same potential to support roosting bats as reported in the previous ES Addendum's relevant bat appendix (**Appendix 5.2**). Since the previous surveys, a new temporary wooden animal shelter has been constructed within the site. It is considered to be of negligible potential to support roosting bats and does not require any further work. The updated data search completed in 2023 returned records of brown long-eared bats, daubenton's bats,	Local	Appendix 5.2

		whiskered/brandt's bats, common and soprano pipistrelle bats and noctule bats. Field sightings and records of roosts were also recorded. The assemblage returned is consistent with the previous results in terms of the known distribution and populations of bats in the locality. **Overall, the habitats within the site remain unchanged and therefore their value and importance to foraging/commuting bats remain unchanged**. For this reason, the site is considered to remain as being locally important for bat populations.		
Birds	Assemblage of common birds including farmland species (most of which are priority species). Both wintering and breeding assemblages are of local ecological importance.	Update surveys have not been completed, but it is noted that the habitats within the site remain unchanged since previous surveys. For this reason, it is expected that the breeding/non-breeding bird assemblages within the site remain	Local	Appendix 5.3

		unchanged and the site continues to be locally important for birds. A similar assemblage of bird records was returned in 2023 as reported in the previous ES Addendum. It should be noted, however, that since the submission of the previous ES Addendum, another version of 'Birds of Conservation Concern' has been published based on more recent research (Version 5, 2021). Many of the 'green' list species known to be present within the site continue to remain on the 'green' list. Wren and wood pigeon were previously on the green list and are now on the amber list. They remain widespread and ubiquitous species, however, so the overall development allows for the continued presence of these species as breeders within the site. Greenfinch were previously on the green list and are now on the red list. This species was a probable breeder in the site and rely on thick		

		hedgerows/tall scrub for nesting habitat. The proposals allow for such habitat within the site, so no residual adverse impacts are expected on this species. House martin were previously on the amber list, but are now on the red list, and are confirmed breeders within the site. The proposals still allow for ample mitigation for this species within the site, so this change is considered inconsequential to the overall impact assessment for this species. Despite the change in BoCC status of greenfinch and house martin, other species of conservation concern remain of the same conservation significance so the previous assessments remain valid. **Overall, the habitats within the site remain unchanged and therefore their value and importance to wintering and breeding birds**		

		remain unchanged. For this reason, the site is considered to remain as being locally important for bird populations.		
Brown Hare	Present - incidental observation of hares on both arable and improved pasture areas. Likely to use hedges, field margins and woodland edges for cover.	No change recorded as of 2023. Desk study returned one additional record of hare than that previously identified, resulting in no overall change in the known presence of this species in the local area.	Local	NA
GCN (and other amphibians)	Small population present in one onsite pond. Surrounding terrestrial habitat likely to be used by GCN	Update surveys have not been completed but the ponds previously noted remain unchanged, and given the barriers to GCN dispersal which exist to all boundaries of the site, the likelihood of additional GCN being able to disperse into these ponds is considered negligible. It is expected that the confirmed small population remains in the site, and even if it has increased marginally since 2020, it is not expected that the site would be considered of greater importance than 'local' for GCN.	Local	Appendix 5.5

		Desk study returned five positive records from between 2017 and 2020 of GCN, with none of these records on-site and none previously returned in the previous ES Addendum. The records were from Appleton Thorn (the nearest of which being >700m distant), which is separated by Bradley Brook and considered to be a barrier to GCN dispersal. Other records were also returned on the opposite side of the M6/M56, so considered either too far or isolated from the site to result in any impact on these populations. It should also be made clear that there are discrepancies between the accuracy of additional records returned for GCN to the south of the site, located on the other side of the M56 which is considered to be a significant barrier to GCN dispersal, even if these species are present. In the raw data returned by the record		

		centre, GCN 'absence' records were identified in a large number of ponds (nearest 475m distant) on the other side of the M56, whereas the summary PDF report which supplements the data (provided at **Appendix 5.7**) suggests the presence of GCN in some of these ponds. In any event, the records are separated from the site by the M56, which is considered to be a significant barrier to GCN dispersal, meaning that any GCN present would not be able to disperse to the site from this location.		
Hedgehog	Likely to be present – using hedgerows, associated field margins and woodland areas	No change recorded as of 2023. Desk study continued to return records of this species in the area – no additional impacts considered.	Local	NA
Otter	Not present - do not need to be considered further in this assessment	Although detailed surveys have not been completed, the watercourse remains unchanged since 2023 and this species are therefore still considered likely absent. The site	Negligible	Appendix 5.6

		generally remains to be of negligible importance to this species. Desk study returned a single record of otter from the Bridgewater Canal from 2015, which is considered irrelevant to the site.		
Water vole	Not present - do not need to be considered further in this assessment	Although detailed surveys have not been completed, the watercourse remains unchanged since 2023 and this species are therefore still considered likely absent. The site generally remains to be of negligible importance to this species. No records of water vole were returned by desk study.	Negligible	Appendix 5.6

Table 3.1 Protected and Priority Species Summary

Future Baseline

5.44. In accordance with Schedule 4 (3) of the EIA Regulations the likely evolution of the environment without implementation of the development is considered to be as follows:

5.45. The development site would continue to comprise a mixture of arable land and improved pasture use for grazing cattle and sheep. Woodland (Bradley Gorse and Wrights Covert) would remain unmanaged, together with ponds on site which would decline in value over time eventually succumbing to natural succession. This is apparent given the minor encroachment of scrub recorded within the woodland and along the brook corridor.

5.46. The site would continue to support a similar cohort of protected and notable species. However, the value of the site for GCN would be likely to decline over time due to the natural succession occurring in ponds leading to a decline in the quality of breeding sites.

5.47. This evolution of the baseline prediction is based on the availability of environmental information and scientific knowledge.

6. Alternatives Considered

6.1. This section remains unchanged since the previous ES Addendum Paper.

7. Potential Environmental Effects

Construction Phase

7.1. No changes regarding construction phase impacts on any receptor are expected as a result of the updated surveys completed in 2023.

7.2. For this reason, the mitigation measures outlined in the previous ES Addendum and translated into draft planning conditions and planning obligations put forward by the Council in their Development Management Planning Committee Report dates March 2022 are considered appropriate.

Operational Phase

7.3. No changes regarding operational phase impacts on any receptor are expected as a result of the updated surveys completed in 2023.

7.4. For this reason, the mitigation measures outlined in the previous ES Addendum and translated into draft planning conditions and planning obligations put forward by the Council in their Development Management Planning Committee Report dates March 2022 are considered appropriate

8. Proposed Mitigation

Construction Phase

8.1. The mitigation measures outlined in the previous ES Addendum and translated into draft planning conditions and planning obligations put forward by the Council in their Development Management Planning Committee Report dates March 2022 are considered appropriate.

Operational Phase

8.2. The mitigation measures outlined in the previous ES Addendum and translated into draft planning conditions and planning obligations put forward by the Council in their Development Management Planning Committee Report dates March 2022 are considered appropriate.

9. Potential Residual Effects

9.1. The habitats within the site and their value to protected and priority species remain unchanged since the previous Addendum Paper. For this reason, the overall importance of the site to each receptor considered remains unchanged.

9.2. Potential Environmental Impacts are the same as previously reported and the mitigation previously proposed is, therefore, considered appropriate for assessing residual impacts as part of this Addendum. The draft planning conditions proposed which relate to update surveys for select species prior to development and the requirement for the production of a Landscape and Ecological Management Plan will also ensure that such mitigation measures are secured, and provide the ability to react to unexpected finds in the future.

9.3. Similarly the S106 obligations proposed also secure the provision of off-site compensatory bird habitat creation.

9.4. Overall, therefore, the residual impacts reported in the previous Addendum Paper remain unchanged taking into account the proposed mitigation measures.

10. Additive Impacts (Cumulative Impacts and their Effects)

10.1. The cumulative sites considered in the previous Addendum paper remain valid and impacts unchanged. One additional site has been factored into the cumulative assessment, however, which is described as:

"Outline application for extension and conversion of existing Services to create Motorway Service Area off M56 and retained Truck Stop off M6, with works comprising demolition of truck wash; part removal of canopy to truck filling station; reconfiguration and extension of car parking (to provide up to 628 spaces), new coach parking (to provide up to 13 spaces), and caravan parking (to provide up to 17 spaces); extension of HGV parking layout (to provide up to 368 spaces); new service yard to amenity building; landscaping, infrastructure and ancillary works".

10.2. The main physical alteration to the site concerns the extension of the Services into the adjacent field to the north-east. In addition to these works, the development also seeks changes to the circulation roads, rearrangements to the existing parking areas and part-removal of the canopy to the existing HGV fuel filling station. The existing access arrangements to the site from Cliff Lane (A50) will be unchanged.

10.3. The alterations to the proposals will not incur any additional impacts on the receptors considered in this Paper.

11. Conclusion

11.1. Overall, impacts on protected/notable sites, habitats and species remain unchanged from the previous ES Addendum Paper. The mitigation measures previously proposed, therefore, are also still considered valid and appropriate.

11.2. The draft conditions and planning obligations put forward by the Council in their Development Management Planning Committee Report also ensure that the development parameters sought will retain the ability to mitigate for any additional impacts (i.e. alterations to bat roosts, captured as part of recommended 'bat mitigation strategy) in the unlikely event future survey work identifies such a need.

Appendices

Appendix 5.7 Desk Study Data

RECORD
LOCAL ENVIRONMENTAL RECORDS CENTRE
for CHESHIRE, HALTON, WARRINGTON and WIRRAL
record-lrc.co.uk | enquiry@record-lrc.co.uk | 01244 383749
RECORD, Cedar House, Chester Zoo, Chester, CH2 1LH

Using this document

In order to navigate this document easily please enable the bookmark tool view using the bookmark icon on the left of your screen:

The bookmark functions within the pdf allow easy navigation through large reports. Bookmarks can be clicked on like hyperlinks taking the user directly to the relevant section.

Those bookmarks with a plus sign next to them (+) can be expanded by clicking on the plus sign. You can minimise these entries again by clicking on the resulting minus sign (-).

In addition you can search through the document for any particular text by using the standard Microsoft shortcut (Ctrl + F) and enter the text you are looking for.

Interpretation of the data

- Species maps: The species maps show the location of protected, notable and Invasive non-native species grouped by taxon. The numbers in brackets adjacent to the species names relate to the grid ID shown on the maps. Records with a grid reference accuracy of 10m square or above are minimised to a 100m square. Where there are more than 100 grid IDs on a map the grid references will be minimised to 1km. The full grid reference can be found within the full record in this report or in the excel spreadsheet of raw data.
- Attribute data: Where available all attribute data is provided with the records. Sex and life stage information as well as the record type all allow greater interpretation of information available. However, it is not always possible to provide this information.
- Species designation Status: The species designation information provided within this enquiry output is based on the best available information provided through the JNCC: *Conservation designations of UK Taxa* list. Information on the limitations to this list is available here: (http://jncc.defra.gov.uk/page-3408)
- Site/habitat data: Due to changes in the NBN web services we are currently unable to provide site and observation data from the NBN, this does not affect local sites. Information for statutory sites can be found at http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx and sites and NBN taxa observations at https://spatial.nbnatlas.org.
  (please be aware of the NBN Atlas guidance for using data https://nbnatlas.org/help/guidance-using-data/).
  Where sites are made up of multiple polygons, these are shown on separate maps and labelled 'A', 'B', 'C' etc.

322446

Grappenhall Six56

SJ6563884538

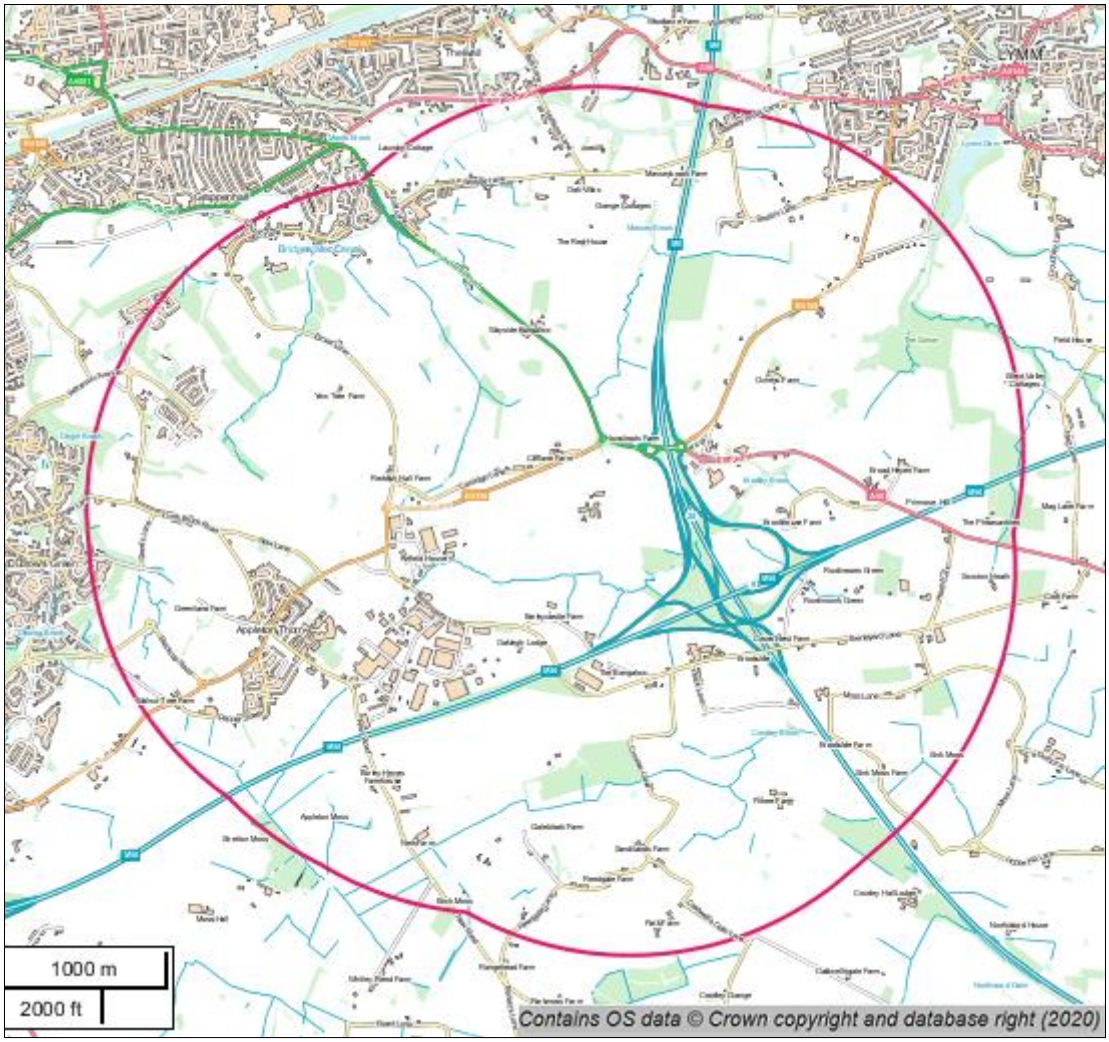


Table of Contents

Using this document 1
Interpretation of the data 1
Table of Contents 3
Designated Species Summary 5
Map 14
Species Summary Report 15
Species Grid Id Summary Report 15
AMPHIBIAN 15
BIRD 15
BONY FISH (ACTINOPTERYGII) 17
CONIFER 17
FLOWERING PLANT 18
INSECT - BEETLE (COLEOPTERA) 18
INSECT - BUTTERFLY 19
INSECT - DRAGONFLY (ODONATA) 19
INSECT - MOTH 19
MOSS 19
REPTILE 19
TERRESTRIAL MAMMAL 20
Grid Id Species Summary Report 21
1 - [SJ6284] 21
2 - [SJ6285] 21
3 - [SJ6382] 21
4 - [SJ6383] 21
5 - [SJ6384] 22
6 - [SJ6385] 22
7 - [SJ6386] 22
8 - [SJ6482] 22
9 - [SJ6483] 23
10 - [SJ6484] 23
11 - [SJ6485] 24
12 - [SJ6486] 24
13 - [SJ6582] 24
14 - [SJ6583] 24
15 - [SJ6584] 25
16 - [SJ6585] 25
17 - [SJ6586] 25
18 - [SJ6587] 26
19 - [SJ6681] 26
20 - [SJ6682] 26
21 - [SJ6683] 27
22 - [SJ6684] 27
23 - [SJ6685] 27
24 - [SJ6686] 28
25 - [SJ6687] 28
26 - [SJ6782] 28
27 - [SJ6783] 28

28 - [SJ6784] 29
29 - [SJ6785] 29
30 - [SJ6786] 29
31 - [SJ6883] 30
32 - [SJ6884] 30
33 - [SJ6886] 30
34 - [SJ68H] 30
Site Boundary Report 31
Local Sites 31
Local Wildlife Sites 31
The Dingle and Ford's Rough / WA035 31
Map 31
The Bongs and the Gorse / WA034 32
Map 32
Stretton Moss / WA033 33
Map 33
Lymm Dam Complex / WA020 34
Map 34
Grappenhall Heys_A / WA012 35
Map 35
Grappenhall Heys_B / WA012 36
Map 36
THE BONGS AND THE GORSE / CE318 37
Map 37
Regionally Important Geodiversity Sites 38
Lymm Dam / CH050 38
Map 38
Statutory Sites 39
Other Sites of Conservation Interest 39

Designated Species Summary

Taxa	Designation Name	Occurrence in Cheshire tetrads between 2002-2023 (%)	Occurrence in Cheshire tetrads all years (%)
Alder (Alnus glutinosa)	IUCN Global Red List - Least Concern	63%	75%
Barn Owl (Tyto alba)	Local BAP Species, Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	35%	60%
Beaded Chestnut (Agrochola lychnidis)	NERC S41, UK BAP Priority Species	4%	10%
Black Poplar (Populus nigra subsp. betulifolia)	Local BAP Species	22%	26%
Blackbird (Turdus merula)	GB Red List (breeding) - Least Concern	63%	86%
Blackcap (Sylvia atricapilla)	GB Red List (breeding) - Least Concern	38%	76%
Black-headed Gull (Chroicocephalus ridibundus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Vulnerable	31%	44%
Black-necked Grebe (Podiceps nigricollis)	Local BAP Species, Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of Conservation Concern - Amber, GB Red List (breeding) - Vulnerable, GB Red List (non-breeding) - Endangered	3%	5%
Black-tailed Godwit (Limosa limosa)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of Conservation Concern - Red, GB Red List (non-breeding) - Least Concern, GB Red List (breeding) - Endangered	8%	11%
Blue Tit (Cyanistes caeruleus)	GB Red List (breeding) - Least Concern	55%	85%
Bluebell (Hyacinthoides non-scripta)	Local BAP Species, Wildlife & Countryside Act - Sch. 8	44%	66%
Blue-tailed Damselfly (Ischnura elegans)	IUCN Global Red List - Least Concern	33%	67%
Box (Buxus sempervirens)	Nationally Rare, ENG Red List - Data Deficient, GB Red List - Data Deficient	4%	4%
Brown Hare (Lepus europaeus)	Local BAP Species, NERC S41, UK BAP Priority Species, EU Red List - Least Concern, GB Red List - Not Evaluated	30%	76%
Brown Long-eared Bat (Plecotus auritus)	Local BAP Species, Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, UK BAP Priority Species, Wildlife & Countryside Act Sch. 5. Sect. 9	40%	48%

Brown Rat (Rattus norvegicus)	GB Red List -Not Evaluated, IUCN Global Red List - Least Concern	20%	29%
Brown-spot Pinion (Agrochola litura)	NERC S41, UK BAP Priority Species	4%	9%
Buff Ermine (Spilosoma lutea)	NERC S41, UK BAP Priority Species	11%	25%
Buzzard (Buteo buteo)	GB Red List (breeding) - Least Concern	65%	68%
Canada Goose (Branta canadensis)	Invasive Non-Native Species	35%	54%
Carrion Crow (Corvus corone)	GB Red List (breeding) - Least Concern	50%	77%
Chaffinch (Fringilla coelebs)	GB Red List (breeding) - Least Concern	52%	84%
Chiffchaff (Phylloscopus collybita)	GB Red List (breeding) - Least Concern	52%	76%
Cinnabar (Tyria jacobaeae)	NERC S41, UK BAP Priority Species	26%	37%
Collared Dove (Streptopelia decaocto)	GB Red List (breeding) - Near Threatened	29%	71%
Common Darter (Sympetrum striolatum)	IUCN Global Red List - Least Concern	34%	50%
Common Frog (Rana temporaria)	Conservation (Habs & Sp) Regulations 2010 - Sch. 5, Wildlife & Countryside Act Sch. 5. Sect. 9, IUCN Global Red List - Least Concern	46%	63%
Common Gull (Larus canus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	16%	28%
Common Lizard (Zootoca vivipara)	NERC S41, UK BAP Priority Species, Wildlife & Countryside Act Sch. 5. Sect. 9, IUCN Global Red List - Least Concern	7%	9%
Common Pipistrelle (Pipistrellus pipistrellus)	Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, Wildlife & Countryside Act Sch. 5. Sect. 9, IUCN Global Red List - Least Concern	59%	60%
Common Tern (Sterna hirundo)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Near Threatened	6%	13%
Common Toad (Bufo bufo)	NERC S41, UK BAP Priority Species, Wildlife & Countryside Act Sch. 5. Sect. 9, IUCN Global Red List - Least Concern	32%	43%
Common Valerian (Valeriana officinalis)	ENG Red List - Near Threatened, Red listing based on 2001 IUCN guidelines Waiting List	13%	26%
Common Vetch (Vicia sativa subsp. segetalis)	Red listing based on 2001 IUCN guidelines Waiting List	13%	16%

Coot (Fulica atra)	GB Red List (breeding) - Near Threatened, GB Red List (non-breeding) - Near Threatened	28%	54%
Cormorant (Phalacrocorax carbo)	GB Red List (breeding) - Near Threatened, GB Red List (non-breeding) - Least Concern	24%	30%
Corn Spurrey (Spergula arvensis)	ENG Red List - Vulnerable, GB Red List - Vulnerable	5%	13%
Cornfield Knotgrass (Polygonum rurivagum)	Locally Rare & Scare	<1%	<1%
Creeping Willow (Salix repens)	ENG Red List - Near Threatened	2%	10%
Cryptocephalus parvulus (Cryptocephalus parvulus)	Nationally Scarce, Rare and scarce species - Notable B	<1%	<1%
Cuckoo (Cuculus canorus)	Birds of Conservation Concern - Red, NERC S41, UK BAP Priority Species, GB Red List (breeding) - Vulnerable	14%	69%
Dark-barred Twin-spot Carpet (Xanthorhoe ferrugata)	NERC S41, UK BAP Priority Species	7%	21%
Daubenton's Bat (Myotis daubentonii)	Local BAP Species, Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, Wildlife & Countryside Act Sch. 5. Sect. 9	16%	20%
Dittander (Lepidium latifolium)	Nationally Scarce	<1%	<1%
Dunnock (Prunella modularis)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	42%	84%
Dusky Thorn (Ennomos fuscantaria)	NERC S41, UK BAP Priority Species	8%	15%
Eastern Grey Squirrel (Sciurus carolinensis)	GB Red List -Not Evaluated, IUCN Global Red List - Least Concern	47%	59%
Emperor Dragonfly (Anax imperator)	IUCN Global Red List - Least Concern	19%	23%
Eurasian Badger (Meles meles)	Protection of Badgers Act 1992	68%	75%
European Otter (Lutra lutra)	Local BAP Species, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, UK BAP Priority Species, Wildlife & Countryside Act Sch. 5. Sect. 9	16%	24%
European Rabbit (Oryctolagus cuniculus)	EU Red List - Near Threatened, GB Red List -Not Evaluated, IUCN Global Red List - Near Threatened	61%	71%
False-acacia (Robinia pseudoacacia)	Invasive Non-Native Species	8%	10%
Field Woundwort (Stachys arvensis)	ENG Red List - Near Threatened, GB Red List - Near Threatened	2%	8%
Fieldfare (Turdus pilaris)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of	29%	42%

	Conservation Concern - Red, GB Red List (non-breeding) - Least Concern, GB Red List (breeding) - Critically Endangered (poss. Extinct)		
Freiberg's Screw-moss (Tortula freibergii)	NERC S41, UK BAP Priority Species	9%	9%
Gadwall (Anas strepera)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	10%	14%
Garden Angelica (Angelica archangelica)	GB Red List - Regionally Extinct	3%	4%
Giant Hogweed (Heracleum mantegazzianum)	Invasive Non-Native Species	9%	12%
Goldcrest (Regulus regulus)	GB Red List (breeding) - Least Concern	24%	55%
Goldfinch (Carduelis carduelis)	GB Red List (breeding) - Least Concern	45%	79%
Grass Vetchling (Lathyrus nissolia)	Locally Rare & Scare	4%	4%
Great Crested Grebe (Podiceps cristatus)	GB Red List (breeding) - Vulnerable, GB Red List (non-breeding) - Least Concern	17%	28%
Great Crested Newt (Triturus cristatus)	Local BAP Species, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, UK BAP Priority Species, Wildlife & Countryside Act Sch. 5. Sect. 9, IUCN Global Red List - Least Concern	42%	49%
Great Spotted Woodpecker (Dendrocopos major)	GB Red List (breeding) - Least Concern	42%	74%
Great Tit (Parus major)	GB Red List (breeding) - Least Concern	53%	84%
Green Sandpiper (Tringa ochropus)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of Conservation Concern - Amber, GB Red List (non-breeding) - Endangered, GB Red List (breeding) - Endangered	10%	19%
Greenfinch (Chloris chloris)	Birds of Conservation Concern - Red, GB Red List (breeding) - Endangered	38%	78%
Grey Heron (Ardea cinerea)	GB Red List (breeding) - Near Threatened, GB Red List (non-breeding) - Least Concern	42%	68%
Grey Partridge (Perdix perdix)	Local BAP Species, Birds of Conservation Concern - Red, NERC S41, UK BAP Priority Species, GB Red List (breeding) - Vulnerable	11%	58%
Grey Wagtail (Motacilla cinerea)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Near Threatened	24%	46%

Greylag Goose (Anser anser)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	16%	22%
Hobby (Falco subbuteo)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, GB Red List (breeding) - Least Concern	17%	21%
House Martin (Delichon urbicum)	Birds of Conservation Concern - Red, GB Red List (breeding) - Vulnerable	33%	67%
House Sparrow (Passer domesticus)	Local BAP Species, Birds of Conservation Concern - Red, NERC S41, UK BAP Priority Species, GB Red List (breeding) - Least Concern	45%	84%
Indian Balsam (Impatiens glandulifera)	Invasive Non-Native Species	38%	42%
Jackdaw (Corvus monedula)	GB Red List (breeding) - Least Concern	40%	74%
Japanese Knotweed (Fallopia japonica)	Invasive Non-Native Species	30%	35%
Japanese Rose (Rosa rugosa)	Invasive Non-Native Species	7%	10%
Jay (Garrulus glandarius)	GB Red List (breeding) - Least Concern	41%	73%
Kestrel (Falco tinnunculus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Vulnerable	47%	78%
Kingfisher (Alcedo atthis)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, GB Red List (breeding) - Least Concern	25%	48%
Lapwing (Vanellus vanellus)	Local BAP Species, Birds of Conservation Concern - Red, NERC S41, UK BAP Priority Species, GB Red List (non-breeding) - Vulnerable, GB Red List (breeding) - Endangered	37%	77%
Large Wainscot (Rhizedra lutosa)	NERC S41, UK BAP Priority Species	4%	8%
Large-flowered Hemp-nettle (Galeopsis speciosa)	ENG Red List - Vulnerable, GB Red List - Vulnerable	2%	8%
Linnet (Linaria cannabina)	Birds of Conservation Concern - Red, GB Red List (breeding) - Near Threatened	22%	77%
Little Grebe (Tachybaptus ruficollis)	GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	16%	31%
Long-tailed Tit (Aegithalos caudatus)	GB Red List (breeding) - Least Concern	42%	73%
Magpie (Pica pica)	GB Red List (breeding) - Least Concern	53%	85%
Mallard (Anas platyrhynchos)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Near Threatened	52%	81%

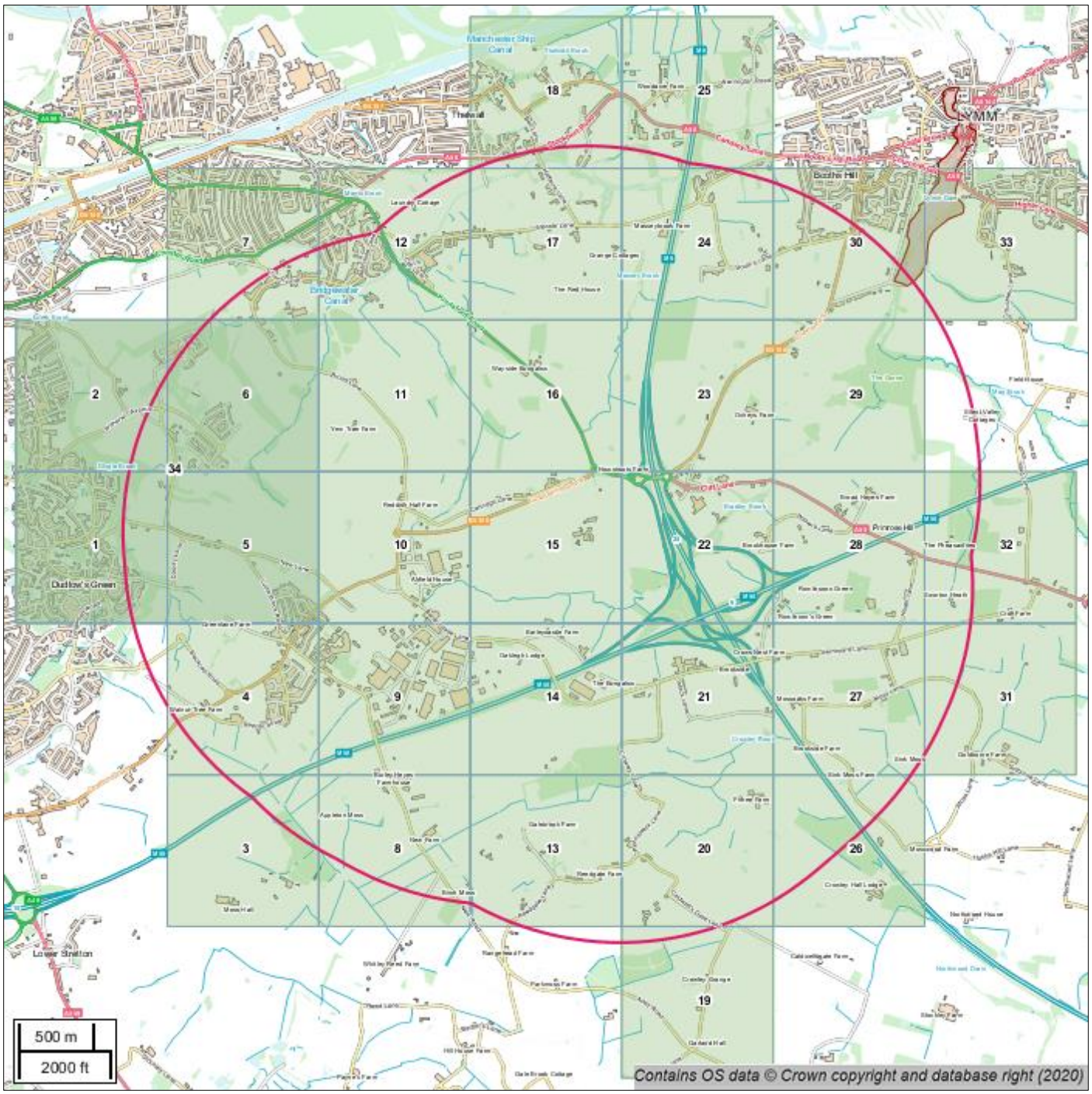
Marsh Harrier (Circus aeruginosus)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of Conservation Concern - Amber, GB Red List (breeding) - Near Threatened	6%	8%
Mistle Thrush (Turdus viscivorus)	Birds of Conservation Concern - Red, GB Red List (breeding) - Vulnerable	33%	81%
Montbretia (Crocosmia pottsii x aurea = C. x crocosmiiflora)	Invasive Non-Native Species	13%	16%
Moorhen (Gallinula chloropus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Vulnerable	35%	80%
Mottled Rustic (Caradrina morpheus)	NERC S41, UK BAP Priority Species	7%	19%
Mouse Moth (Amphipyra tragopoginis)	NERC S41, UK BAP Priority Species	6%	19%
Myotis bat species (Myotis)	Wildlife & Countryside Act - Schedule 5, Wildlife & Countryside Act - Schedule 5, NERC S41, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 2	30%	38%
Natterer's Bat (Myotis nattereri)	Local BAP Species, Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, Wildlife & Countryside Act Sch. 5. Sect. 9	12%	13%
Noctule Bat (Nyctalus noctula)	Local BAP Species, Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, UK BAP Priority Species, Wildlife & Countryside Act Sch. 5. Sect. 9	44%	49%
Nuthatch (Sitta europaea)	GB Red List (breeding) - Least Concern	33%	58%
Nuttall's Waterweed (Elodea nuttallii)	Invasive Non-Native Species	3%	5%
Oak Hook-tip (Watsonalla binaria)	NERC S41, UK BAP Priority Species	8%	17%
Oystercatcher (Haematopus ostralegus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	18%	25%
Pied Wagtail (Motacilla alba)	GB Red List (breeding) - Least Concern	28%	70%
Pied Wagtail (Motacilla alba subsp. yarrellii)	GB Red List (breeding) - Least Concern	20%	58%
Pike (Esox lucius)	IUCN Global Red List - Least Concern	2%	6%

Pink-footed Goose (Anser brachyrhynchus)	Birds of Conservation Concern - Amber, GB Red List (non-breeding) - Least Concern	15%	18%
Pipistrelle bat species (Pipistrellus pipistrelles agg.)	Local BAP Species, Local BAP Species, Wildlife & Countryside Act - Schedule 5, Wildlife & Countryside Act - Schedule 5, NERC S41, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 2	35%	53%
Platyderus depressus (Platyderus depressus)	Rare and scarce species - Notable B	<1%	<1%
Pochard (Aythya ferina)	Birds of Conservation Concern - Red, GB Red List (non-breeding) - Endangered, GB Red List (breeding) - Endangered	9%	18%
Polecat (Mustela putorius)	Local BAP Species, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 5, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, UK BAP Priority Species	19%	30%
Ragged-Robin (Silene flos-cuculi)	ENG Red List - Near Threatened	16%	35%
Reed Bunting (Emberiza schoeniclus)	Local BAP Species, Birds of Conservation Concern - Amber, NERC S41, UK BAP Priority Species, GB Red List (breeding) - Least Concern	25%	72%
Rhododendron ponticum (Rhododendron ponticum)	Invasive Non-Native Species	29%	42%
Robin (Erithacus rubecula)	GB Red List (breeding) - Least Concern	56%	85%
Rosy Rustic (Hydraecia micacea)	NERC S41, UK BAP Priority Species	9%	21%
Ruddy Duck (Oxyura jamaicensis)	Invasive Non-Native Species	6%	15%
Rye Brome (Bromus secalinus)	Nationally Scarce, Locally Rare & Scare, ENG Red List - Near Threatened, GB Red List - Near Threatened	1%	1%
Sand Martin (Riparia riparia)	GB Red List (breeding) - Least Concern	12%	35%
Scaup (Aythya marila)	Wildlife & Countryside Act 1981 - Sch. 1 - Part 1, Birds of Conservation Concern - Red, NERC S41, UK BAP Priority Species, GB Red List (non-breeding) - Endangered	5%	10%
Shelduck (Tadorna tadorna)	Birds of Conservation Concern - Amber, GB Red List (non-breeding) - Endangered, GB Red List (breeding) - Endangered	14%	21%
Short-eared Owl (Asio flammeus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Endangered	8%	14%

Shoveler (Anas clypeata)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	13%	19%
Siskin (Spinus spinus)	GB Red List (breeding) - Least Concern	17%	31%
Skylark (Alauda arvensis)	Local BAP Species, Birds of Conservation Concern - Red, NERC S41, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	27%	84%
Small Square-spot (Diarsia rubi)	NERC S41, UK BAP Priority Species	10%	21%
Smooth Newt (Lissotriton vulgaris)	Wildlife & Countryside Act Sch. 5. Sect. 9, IUCN Global Red List - Least Concern	29%	43%
Snipe (Gallinago gallinago)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Near Threatened	19%	53%
Song Thrush (Turdus philomelos)	Local BAP Species, Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	45%	86%
Soprano Pipistrelle (Pipistrellus pygmaeus)	Local BAP Species, Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, UK BAP Priority Species, Wildlife & Countryside Act Sch. 5. Sect. 9	50%	50%
Sparrowhawk (Accipiter nisus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Near Threatened	32%	67%
Starling (Sturnus vulgaris)	Local BAP Species, Birds of Conservation Concern - Red, GB Red List (breeding) - Vulnerable, GB Red List (non-breeding) - Least Concern	41%	85%
Stock Dove (Columba oenas)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	20%	66%
Swallow (Hirundo rustica)	GB Red List (breeding) - Least Concern	57%	85%
Swift (Apus apus)	Birds of Conservation Concern - Red, GB Red List (breeding) - Endangered	31%	81%
Tawny Owl (Strix aluco)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Near Threatened	24%	65%
Teal (Anas crecca)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	16%	30%
Treecreeper (Certhia familiaris)	GB Red List (breeding) - Least Concern	20%	65%

Tufted Duck (Aythya fuligula)	GB Red List (breeding) - Least Concern, GB Red List (non-breeding) - Least Concern	19%	32%
Turkey Oak (Quercus cerris)	Invasive Non-Native Species	18%	29%
Wall (Lasiommata megera)	NERC S41, UK BAP Priority Species, GB Red List - Near Threatened	13%	63%
Water Rail (Rallus aquaticus)	GB Red List (breeding) - Least Concern	11%	17%
Welsh Poppy (Meconopsis cambrica)	Nationally Scarce	8%	9%
West European Hedgehog (Erinaceus europaeus)	NERC S41, UK BAP Priority Species, GB Red List - Vulnerable	33%	46%
Whiskered Bat (Myotis mystacinus)	Local BAP Species, Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2, Conservation (Habs & Sp) Regulations 2010 - Sch. 4, Wildlife & Countryside Act Sch. 5. Sect. 9, GB Red List - Data Deficient	10%	14%
Whiskered/Brandt's Bat (Myotis mystacinus/brandtii)	Wildlife & Countryside Act - Schedule 5, NERC S41, Conservation (Habs & Sp) Regulations 2010 - Sch. 2	6%	6%
White Ermine (Spilosoma lubricipeda)	NERC S41, UK BAP Priority Species	10%	25%
Wigeon (Anas penelope)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Near Threatened, GB Red List (non-breeding) - Least Concern	13%	19%
Wild Pansy (Viola tricolor)	ENG Red List - Near Threatened, GB Red List - Near Threatened	3%	8%
Wild Strawberry (Fragaria vesca)	ENG Red List - Near Threatened	8%	15%
Willow Tit (Poecile montana)	Birds of Conservation Concern - Red, GB Red List (breeding) - Endangered	8%	43%
Willow Warbler (Phylloscopus trochilus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	28%	81%
Woodpigeon (Columba palumbus)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	57%	86%
Wood-sorrel (Oxalis acetosella)	ENG Red List - Near Threatened	21%	38%
Wren (Troglodytes troglodytes)	Birds of Conservation Concern - Amber, GB Red List (breeding) - Least Concern	53%	85%
Yellowhammer (Emberiza citrinella)	Local BAP Species, Birds of Conservation Concern - Red, NERC S41, UK BAP Priority Species, GB Red List (breeding) - Least Concern	20%	76%
Yew (Taxus baccata)	IUCN Global Red List (1994 guidelines) - Least Concern	33%	38%

Map


500 m
2000 ft
Contains OS data © Crown copyright and database right (2020)

Species Grid Id Summary Report

AMPHIBIAN

Taxon name	Grid ref. id
Great Crested Newt	4 (2019), 9 (2018), 24 (2017), 28 (2020)
Common Toad	6 (2013), 8 (2010), 21 (2019), 28 (2008)
Common Frog	4 (2003-2004), 21 (2019), 28 (2008)
Smooth Newt	21 (2019)

BIRD

Taxon name	Grid ref. id
Blackbird	6 (2013), 14 (2008), 17 (2017)
Black-tailed Godwit	8 (2010)
Green Sandpiper	8 (2010)
Goldcrest	5 (2021)
Black-headed Gull	8 (2010), 14 (2008)
Linnet	14 (2014)
Cormorant	8 (2010)
Canada Goose	8 (2010)
House Martin	8 (2010)
Chaffinch	14 (2008)
Common Tern	8 (2010)
Great Tit	6 (2013), 14 (2008)
Little Grebe	8 (2010)
Mistle Thrush	7 (2008), 8 (2010), 14 (2008), 17 (2017)
Common Gull	14 (2008)
Chiffchaff	8 (2011-2012), 10 (2012), 14 (2008), 16 (2010), 17 (2011)
Grey Heron	8 (2010), 15 (2010), 28 (2017)
Black-necked Grebe	8 (2010)
Hobby	8 (2010)
Marsh Harrier	8 (2010)
Coot	8 (2010), 17 (2017)
Collared Dove	8 (2010), 13 (2014), 14 (2008)
Greylag Goose	8 (2010)

Barn Owl	14 (2005), 22 (2015)
Moorhen	6 (2013)
Buzzard	4 (2020), 5 (2021), 6 (2013), 8 (2010), 9 (2011-2020), 10 (2016), 14 (2008-2020), 15 (2009), 21 (2008-2015), 22 (2004), 23 (2010-2011), 27 (2011-2019), 28 (2015-2018), 31 (2020), 32 (2007)
Fieldfare	27 (2018)
Great Crested Grebe	8 (2010)
Kingfisher	1 (2015), 12 (2017), 18 (2004)
Jay	14 (2008-2014), 15 (2010), 16 (2010)
Greenfinch	8 (2010), 14 (2008), 15 (2010)
Great Spotted Woodpecker	16 (2010), 17 (2011)
Cuckoo	8 (2010), 17 (2011)
Jackdaw	17 (2011)
Kestrel	3 (2011), 4 (2011), 8 (2010), 9 (2015), 14 (2008-2016), 17 (2011), 21 (2012), 27 (2013)
Blue Tit	17 (2011)
Dunnock	17 (2011)
House Sparrow	14 (2008), 27 (2017)
Magpie	6 (2013), 14 (2008-2016), 16 (2010)
Grey Partridge	9 (2014), 14 (2008)
Blackcap	16 (2010), 17 (2011)
Long-tailed Tit	12 (2014), 14 (2008), 15 (2010), 16 (2010), 21 (2008), 27 (2017)
Carrion Crow	14 (2008), 16 (2010), 17 (2017)
Gadwall	8 (2010), 15 (2010)
Goldfinch	14 (2008), 17 (2010)
Mallard	6 (2013-2015), 8 (2010), 10 (2009), 17 (2017)
Lapwing	1 (2009), 4 (2004-2018), 5 (2009), 8 (2010), 14 (2008-2014), 15 (2010), 21 (2008), 24 (2011), 27 (2017), 29 (2004)
Grey Wagtail	12 (2014)
Wigeon	8 (2010)
Treecreeper	17 (2011)
Willow Tit	8 (2010)
Willow Warbler	14 (2008), 16 (2010), 17 (2011)
Short-eared Owl	14 (2013)
Pink-footed Goose	4 (2015)
Teal	8 (2010)

Water Rail	8 (2010)
Oystercatcher	8 (2010)
Sparrowhawk	9 (2011-2017), 12 (2009), 13 (2014), 14 (2008-2013), 15 (2010), 16 (2010), 20 (2020)
Pied Wagtail	8 (2010), 14 (2008), 21 (2014)
Stock Dove	8 (2010)
Swift	8 (2010), 14 (2008)
Swallow	1 (2009), 8 (2010), 12 (2012), 14 (2008-2012), 21 (2020), 27 (2017)
Shelduck	8 (2010)
Pied Wagtail	8 (2010)
Sand Martin	8 (2010)
Yellowhammer	5 (2021), 10 (2011)
Skylark	10 (2011), 14 (2008-2014), 27 (2018), 28 (2005)
Woodpigeon	6 (2013), 9 (2011), 13 (2014), 14 (2008)
Song Thrush	14 (2008), 16 (2010)
Shoveler	15 (2010)
Scaup	15 (2010)
Pochard	15 (2010)
Ruddy Duck	8 (2010), 16 (2017)
Robin	6 (2013), 14 (2008), 16 (2010)
Tawny Owl	2 (2010), 12 (2009-2013), 14 (2008), 17 (2010)
Snipe	21 (2008), 27 (2008)
Wren	27 (2017)
Starling	8 (2010), 14 (2008-2017), 28 (2017), 32 (2015)
Nuthatch	16 (2010), 17 (2011), 27 (2017)
Reed Bunting	15 (2010)
Tufted Duck	15 (2010)
Siskin	15 (2010)

BONY FISH (ACTINOPTERYGII)

Taxon name	Grid ref. id
Pike	30 (2003)

CONIFER

Taxon name	Grid ref. id
Yew	18 (2014), 29 (2015), 30 (2013-2015)

FLOWERING PLANT

Taxon name	Grid ref. id
Dittander	28 (2010)
Black Poplar	26 (2004)
Common Valerian	1 (2007)
Corn Spurrey	1 (2007)
Box	30 (2013)
Common Vetch	1 (2007), 22 (2007)
Bluebell	1 (2007), 14 (2010), 18 (2014), 22 (2007), 24 (2007), 29 (2015), 30 (2015), 33 (2004), 34 (2016)
Montbretia	8 (2006)
Indian Balsam	10 (2007), 17 (2008), 18 (2012), 22 (2007), 24 (2007), 29 (2015), 30 (2008-2015), 33 (2004)
Large-flowered Hemp-nettle	8 (2006)
Field Woundwort	8 (2006)
Japanese Rose	22 (2007)
Giant Hogweed	22 (2007)
Alder	1 (2007), 8 (2006), 10 (2007), 14 (2008), 18 (2004-2014), 22 (2007), 23 (2013), 27 (2006), 28 (2012), 29 (2015), 30 (2015), 32 (2006), 33 (2004), 34 (2016)
Garden Angelica	18 (2004)
Grass Vetchling	11 (2007)
Cornfield Knotgrass	14 (2006)
Japanese Knotweed	6 (2014), 10 (2007), 11 (2006-2017), 12 (2008), 16 (2007), 18 (2004), 24 (2017), 32 (2006), 33 (2004)
Creeping Willow	14 (2008)
False-acacia	18 (2014)
Ragged-Robin	23 (2013)
Wild Strawberry	1 (2007)
Nuttall's Waterweed	18 (2004-2009)
Wild Pansy	9 (2015)
Welsh Poppy	1 (2007)
Rye Brome	8 (2006)
Rhododendron ponticum	1 (2007), 22 (2007), 24 (2007), 29 (2015), 30 (2008-2015), 33 (2004), 34 (2016)
Wood-sorrel	1 (2007), 22 (2007-2015), 29 (2015), 30 (2015)
Turkey Oak	32 (2006)

INSECT - BEETLE (COLEOPTERA)

Taxon name	Grid ref. id
Cryptocephalus parvulus	14 (2009)
Platyderus depressus	28 (2009)

INSECT - BUTTERFLY

Taxon name	Grid ref. id
Wall	32 (2015)

INSECT - DRAGONFLY (ODONATA)

Taxon name	Grid ref. id
Emperor Dragonfly	5 (2006)
Blue-tailed Damselfly	6 (2013)
Common Darter	6 (2013-2015), 19 (2002)

INSECT - MOTH

Taxon name	Grid ref. id
Dusky Thorn	28 (2006)
Brown-spot Pinion	28 (2006)
Mouse Moth	4 (2007), 28 (2006)
Large Wainscot	28 (2006)
Beaded Chestnut	28 (2006)
Mottled Rustic	4 (2007)
Buff Ermine	4 (2006)
Dark-barred Twin-spot Carpet	4 (2006)
Cinnabar	4 (2006), 18 (2002), 22 (2004-2005), 28 (2003), 31 (2004)
White Ermine	4 (2006)
Small Square-spot	4 (2006)
Rosy Rustic	28 (2006)
Oak Hook-tip	28 (2006)

MOSS

Taxon name	Grid ref. id
Freiberg's Screw-moss	12 (2005-2008), 17 (2005-2008), 18 (2008), 24 (2008), 25 (2008)

REPTILE

Taxon name	Grid ref. id
Common Lizard	28 (2008)

TERRESTRIAL MAMMAL

Taxon name	Grid ref. id
Daubenton's Bat	27 (2014)
Natterer's Bat	12 (2017), 27 (2017)
Common Pipistrelle	2 (2002-2005), 12 (2012-2017), 13 (2010), 14 (2010), 17 (2012-2013), 18 (2018), 20 (2010), 21 (2010), 22 (2010), 27 (2014-2017), 28 (2010-2020), 30 (2014-2017)
European Rabbit	6 (2014), 8 (2002), 9 (2014), 10 (2011), 14 (2008), 16 (2007-2010), 22 (2014-2015), 23 (2013), 29 (2015)
Brown Long-eared Bat	12 (2012-2017), 17 (2012-2013), 18 (2018), 27 (2017), 28 (2004-2017)
Eastern Grey Squirrel	16 (2007)
Myotis bat species	18 (2018)
Eurasian Badger	1 (2013-2022), 2 (2010-2021), 3 (2013-2020), 4 (2012-2014), 5 (2010-2021), 6 (2011-2021), 8 (2010-2020), 9 (2020), 10 (2012-2021), 11 (2014-2021), 12 (2012-2020), 14 (2011-2022), 15 (2015), 16 (2012-2021), 17 (2010), 18 (2014), 21 (2005-2019), 22 (2005-2020), 23 (2013), 28 (2004-2019), 32 (2004-2021)
Brown Hare	3 (2020), 6 (2012), 8 (2002), 11 (2019), 14 (2008-2012), 17 (2007-2011), 29 (2004-2007), 31 (2017)
European Otter	12 (2015)
Brown Rat	16 (2010), 21 (2014)
Whiskered Bat	12 (2013), 17 (2012)
Whiskered/Brandt's Bat	12 (2012-2017)
Pipistrelle bat species	2 (2002-2005), 12 (2012), 24 (2016)
Noctule Bat	2 (2002-2004), 12 (2012-2015), 13 (2010), 17 (2012), 18 (2018), 27 (2017), 28 (2017), 30 (2014)
West European Hedgehog	4 (2017), 5 (2014), 8 (2014), 10 (2018), 14 (2014), 27 (2016), 28 (2017), 30 (2005)
Soprano Pipistrelle	2 (2002-2005), 12 (2012-2017), 17 (2013), 18 (2018), 21 (2010), 27 (2014-2017), 28 (2017)
Polecat	24 (2007)

1 - [SJ6284]

Taxon group	Taxon name
BIRD	Kingfisher (Alcedo atthis) (2015), Lapwing (Vanellus vanellus) (2009), Swallow (Hirundo rustica) (2009)
FLOWERING PLANT	Common Valerian (Valeriana officinalis) (2007), Corn Spurrey (Spergula arvensis) (2007), Common Vetch (Vicia sativa subsp. segetalis) (2007), Bluebell (Hyacinthoides non-scripta) (2007), Alder (Alnus glutinosa) (2007), Wild Strawberry (Fragaria vesca) (2007), Welsh Poppy (Meconopsis cambrica) (2007), Rhododendron ponticum (Rhododendron ponticum) (2007), Wood-sorrel (Oxalis acetosella) (2007)
TERRESTRIAL MAMMAL	Eurasian Badger (Meles meles) (2013-2022)

2 - [SJ6285]

Taxon group	Taxon name
BIRD	Tawny Owl (Strix aluco) (2010)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2002-2005), Eurasian Badger (Meles meles) (2010-2021), Pipistrelle bat species (Pipistrellus pipistrelles agg.) (2002-2005), Noctule Bat (Nyctalus noctula) (2002-2004), Soprano Pipistrelle (Pipistrellus pygmaeus) (2002-2005)

3 - [SJ6382]

Taxon group	Taxon name
BIRD	Kestrel (Falco tinnunculus) (2011)
TERRESTRIAL MAMMAL	Eurasian Badger (Meles meles) (2013-2020), Brown Hare (Lepus europaeus) (2020)

4 - [SJ6383]

Taxon group	Taxon name
AMPHIBIAN	Great Crested Newt (Triturus cristatus) (2019), Common Frog (Rana temporaria) (2003-2004)
BIRD	Buzzard (Buteo buteo) (2020), Kestrel (Falco tinnunculus) (2011), Lapwing (Vanellus vanellus) (2004-2018), Pink-footed Goose (Anser brachyrhynchus) (2015)
INSECT - MOTH	Mouse Moth (Amphipyra tragopoginis) (2007), Mottled Rustic (Caradrina morpheus) (2007), Buff Ermine (Spilosoma lutea) (2006), Dark-barred Twin-spot Carpet (Xanthorhoe ferrugata) (2006), Cinnabar (Tyria jacobaeae) (2006), White Ermine (Spilosoma lubricipeda) (2006), Small Square-spot (Diarsia rubi) (2006)

TERRESTRIAL MAMMAL	Eurasian Badger (Meles meles) (2012-2014), West European Hedgehog (Erinaceus europaeus) (2017)

5 - [SJ6384]

Taxon group	Taxon name
BIRD	Goldcrest (Regulus regulus) (2021), Buzzard (Buteo buteo) (2021), Lapwing (Vanellus vanellus) (2009), Yellowhammer (Emberiza citrinella) (2021)
INSECT - DRAGONFLY (ODONATA)	Emperor Dragonfly (Anax imperator) (2006)
TERRESTRIAL MAMMAL	Eurasian Badger (Meles meles) (2010-2021), West European Hedgehog (Erinaceus europaeus) (2014)

6 - [SJ6385]

Taxon group	Taxon name
AMPHIBIAN	Common Toad (Bufo bufo) (2013)
BIRD	Blackbird (Turdus merula) (2013), Great Tit (Parus major) (2013), Moorhen (Gallinula chloropus) (2013), Buzzard (Buteo buteo) (2013), Magpie (Pica pica) (2013), Mallard (Anas platyrhynchos) (2013-2015), Woodpigeon (Columba palumbus) (2013), Robin (Erithacus rubecula) (2013)
FLOWERING PLANT	Japanese Knotweed (Fallopia japonica) (2014)
INSECT - DRAGONFLY (ODONATA)	Blue-tailed Damselfly (Ischnura elegans) (2013), Common Darter (Sympetrum striolatum) (2013-2015)
TERRESTRIAL MAMMAL	European Rabbit (Oryctolagus cuniculus) (2014), Eurasian Badger (Meles meles) (2011-2021), Brown Hare (Lepus europaeus) (2012)

7 - [SJ6386]

Taxon group	Taxon name
BIRD	Mistle Thrush (Turdus viscivorus) (2008)

8 - [SJ6482]

Taxon group	Taxon name
AMPHIBIAN	Common Toad (Bufo bufo) (2010)
BIRD	Black-tailed Godwit (Limosa limosa) (2010), Green Sandpiper (Tringa ochropus) (2010), Black-headed Gull (Chroicocephalus ridibundus) (2010), Cormorant (Phalacrocorax carbo) (2010), Canada Goose (Branta canadensis) (2010), House Martin (Delichon urbicum) (2010),

	Common Tern (Sterna hirundo) (2010), Little Grebe (Tachybaptus ruficollis) (2010), Mistle Thrush (Turdus viscivorus) (2010), Chiffchaff (Phylloscopus collybita) (2011-2012), Grey Heron (Ardea cinerea) (2010), Black-necked Grebe (Podiceps nigricollis) (2010), Hobby (Falco subbuteo) (2010), Marsh Harrier (Circus aeruginosus) (2010), Coot (Fulica atra) (2010), Collared Dove (Streptopelia decaocto) (2010), Greylag Goose (Anser anser) (2010), Buzzard (Buteo buteo) (2010), Great Crested Grebe (Podiceps cristatus) (2010), Greenfinch (Chloris chloris) (2010), Cuckoo (Cuculus canorus) (2010), Kestrel (Falco tinnunculus) (2010), Gadwall (Anas strepera) (2010), Mallard (Anas platyrhynchos) (2010), Lapwing (Vanellus vanellus) (2010), Wigeon (Anas penelope) (2010), Willow Tit (Poecile montana) (2010), Teal (Anas crecca) (2010), Water Rail (Rallus aquaticus) (2010), Oystercatcher (Haematopus ostralegus) (2010), Pied Wagtail (Motacilla alba) (2010), Stock Dove (Columba oenas) (2010), Swift (Apus apus) (2010), Swallow (Hirundo rustica) (2010), Shelduck (Tadorna tadorna) (2010), Pied Wagtail (Motacilla alba subsp. yarrellii) (2010), Sand Martin (Riparia riparia) (2010), Ruddy Duck (Oxyura jamaicensis) (2010), Starling (Sturnus vulgaris) (2010)
FLOWERING PLANT	Montbretia (Crocosmia pottsii x aurea = C. x crocosmiiflora) (2006), Large-flowered Hemp-nettle (Galeopsis speciosa) (2006), Field Woundwort (Stachys arvensis) (2006), Alder (Alnus glutinosa) (2006), Rye Brome (Bromus secalinus) (2006)
TERRESTRIAL MAMMAL	European Rabbit (Oryctolagus cuniculus) (2002), Eurasian Badger (Meles meles) (2010-2020), Brown Hare (Lepus europaeus) (2002), West European Hedgehog (Erinaceus europaeus) (2014)

9 - [SJ6483]

Taxon group	Taxon name
AMPHIBIAN	Great Crested Newt (Triturus cristatus) (2018)
BIRD	Buzzard (Buteo buteo) (2011-2020), Kestrel (Falco tinnunculus) (2015), Grey Partridge (Perdix perdix) (2014), Sparrowhawk (Accipiter nisus) (2011-2017), Woodpigeon (Columba palumbus) (2011)
FLOWERING PLANT	Wild Pansy (Viola tricolor) (2015)
TERRESTRIAL MAMMAL	European Rabbit (Oryctolagus cuniculus) (2014), Eurasian Badger (Meles meles) (2020)

10 - [SJ6484]

Taxon group	Taxon name
BIRD	Chiffchaff (Phylloscopus collybita) (2012), Buzzard (Buteo buteo) (2016), Mallard (Anas platyrhynchos) (2009), Yellowhammer (Emberiza citrinella) (2011), Skylark (Alauda arvensis) (2011)
FLOWERING PLANT	Indian Balsam (Impatiens glandulifera) (2007), Alder (Alnus glutinosa) (2007), Japanese Knotweed (Fallopia japonica) (2007)
TERRESTRIAL MAMMAL	European Rabbit (Oryctolagus cuniculus) (2011), Eurasian Badger (Meles meles) (2012-2021), West European Hedgehog (Erinaceus europaeus) (2018)

11 - [SJ6485]

Taxon group	Taxon name
FLOWERING PLANT	Grass Vetchling (Lathyrus nissolia) (2007), Japanese Knotweed (Fallopia japonica) (2006-2017)
TERRESTRIAL MAMMAL	Eurasian Badger (Meles meles) (2014-2021), Brown Hare (Lepus europaeus) (2019)

12 - [SJ6486]

Taxon group	Taxon name
BIRD	Kingfisher (Alcedo atthis) (2017), Long-tailed Tit (Aegithalos caudatus) (2014), Grey Wagtail (Motacilla cinerea) (2014), Sparrowhawk (Accipiter nisus) (2009), Swallow (Hirundo rustica) (2012), Tawny Owl (Strix aluco) (2009-2013)
FLOWERING PLANT	Japanese Knotweed (Fallopia japonica) (2008)
MOSS	Freiberg's Screw-moss (Tortula freibergii) (2005-2008)
TERRESTRIAL MAMMAL	Natterer's Bat (Myotis nattereri) (2017), Common Pipistrelle (Pipistrellus pipistrellus) (2012-2017), Brown Long-eared Bat (Plecotus auritus) (2012-2017), Eurasian Badger (Meles meles) (2012-2020), European Otter (Lutra lutra) (2015), Whiskered Bat (Myotis mystacinus) (2013), Whiskered/Brandt's Bat (Myotis mystacinus/brandtii) (2012-2017), Pipistrelle bat species (Pipistrellus pipistrelles agg.) (2012), Noctule Bat (Nyctalus noctula) (2012-2015), Soprano Pipistrelle (Pipistrellus pygmaeus) (2012-2017)

13 - [SJ6582]

Taxon group	Taxon name
BIRD	Collared Dove (Streptopelia decaocto) (2014), Sparrowhawk (Accipiter nisus) (2014), Woodpigeon (Columba palumbus) (2014)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2010), Noctule Bat (Nyctalus noctula) (2010)

14 - [SJ6583]

Taxon group	Taxon name
BIRD	Blackbird (Turdus merula) (2008), Black-headed Gull (Chroicocephalus ridibundus) (2008), Linnet (Linaria cannabina) (2014), Chaffinch (Fringilla coelebs) (2008), Great Tit (Parus major) (2008), Mistle Thrush (Turdus viscivorus) (2008), Common Gull (Larus canus) (2008), Chiffchaff (Phylloscopus collybita) (2008), Collared Dove (Streptopelia decaocto) (2008), Barn Owl (Tyto alba) (2005), Buzzard (Buteo buteo) (2008-2020), Jay (Garrulus glandarius) (2008-2014), Greenfinch (Chloris chloris) (2008), Kestrel (Falco tinnunculus) (2008-2016), House Sparrow (Passer domesticus) (2008), Magpie (Pica pica) (2008-2016), Grey Partridge (Perdix perdix) (2008), Long-tailed Tit (Aegithalos caudatus) (2008), Carrion Crow (Corvus corone) (2008), Goldfinch (Carduelis carduelis) (2008), Lapwing (Vanellus vanellus) (2008-2014), Willow Warbler (Phylloscopus trochilus) (2008), Short-eared Owl (Asio flammeus) (2013), Sparrowhawk (Accipiter nisus) (2008-2013), Pied Wagtail (Motacilla alba) (2008),

	Swift (Apus apus) (2008), Swallow (Hirundo rustica) (2008-2012), Skylark (Alauda arvensis) (2008-2014), Woodpigeon (Columba palumbus) (2008), Song Thrush (Turdus philomelos) (2008), Robin (Erithacus rubecula) (2008), Tawny Owl (Strix aluco) (2008), Starling (Sturnus vulgaris) (2008-2017)
FLOWERING PLANT	Bluebell (Hyacinthoides non-scripta) (2010), Alder (Alnus glutinosa) (2008), Cornfield Knotgrass (Polygonum rurivagum) (2006), Creeping Willow (Salix repens) (2008)
INSECT - BEETLE (COLEOPTERA)	Cryptocephalus parvulus (Cryptocephalus parvulus) (2009)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2010), European Rabbit (Oryctolagus cuniculus) (2008), Eurasian Badger (Meles meles) (2011-2022), Brown Hare (Lepus europaeus) (2008-2012), West European Hedgehog (Erinaceus europaeus) (2014)

15 - [SJ6584]

Taxon group	Taxon name
BIRD	Grey Heron (Ardea cinerea) (2010), Buzzard (Buteo buteo) (2009), Jay (Garrulus glandarius) (2010), Greenfinch (Chloris chloris) (2010), Long-tailed Tit (Aegithalos caudatus) (2010), Gadwall (Anas strepera) (2010), Lapwing (Vanellus vanellus) (2010), Sparrowhawk (Accipiter nisus) (2010), Shoveler (Anas clypeata) (2010), Scaup (Aythya marila) (2010), Pochard (Aythya ferina) (2010), Reed Bunting (Emberiza schoeniclus) (2010), Tufted Duck (Aythya fuligula) (2010), Siskin (Spinus spinus) (2010)
TERRESTRIAL MAMMAL	Eurasian Badger (Meles meles) (2015)

16 - [SJ6585]

Taxon group	Taxon name
BIRD	Chiffchaff (Phylloscopus collybita) (2010), Jay (Garrulus glandarius) (2010), Great Spotted Woodpecker (Dendrocopos major) (2010), Magpie (Pica pica) (2010), Blackcap (Sylvia atricapilla) (2010), Long-tailed Tit (Aegithalos caudatus) (2010), Carrion Crow (Corvus corone) (2010), Willow Warbler (Phylloscopus trochilus) (2010), Sparrowhawk (Accipiter nisus) (2010), Song Thrush (Turdus philomelos) (2010), Ruddy Duck (Oxyura jamaicensis) (2017), Robin (Erithacus rubecula) (2010), Nuthatch (Sitta europaea) (2010)
FLOWERING PLANT	Japanese Knotweed (Fallopia japonica) (2007)
TERRESTRIAL MAMMAL	European Rabbit (Oryctolagus cuniculus) (2007-2010), Eastern Grey Squirrel (Sciurus carolinensis) (2007), Eurasian Badger (Meles meles) (2012-2021), Brown Rat (Rattus norvegicus) (2010)

17 - [SJ6586]

Taxon group	Taxon name
BIRD	Blackbird (Turdus merula) (2017), Mistle Thrush (Turdus viscivorus) (2017), Chiffchaff (Phylloscopus collybita) (2011), Coot (Fulica atra) (2017), Great Spotted Woodpecker (Dendrocopos major) (2011), Cuckoo (Cuculus canorus) (2011), Jackdaw (Corvus monedula) (2011),

	Kestrel (Falco tinnunculus) (2011), Blue Tit (Cyanistes caeruleus) (2011), Dunnock (Prunella modularis) (2011), Blackcap (Sylvia atricapilla) (2011), Carrion Crow (Corvus corone) (2017), Goldfinch (Carduelis carduelis) (2010), Mallard (Anas platyrhynchos) (2017), Treecreeper (Certhia familiaris) (2011), Willow Warbler (Phylloscopus trochilus) (2011), Tawny Owl (Strix aluco) (2010), Nuthatch (Sitta europaea) (2011)
FLOWERING PLANT	Indian Balsam (Impatiens glandulifera) (2008)
MOSS	Freiberg's Screw-moss (Tortula freibergii) (2005-2008)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2012-2013), Brown Long-eared Bat (Plecotus auritus) (2012-2013), Eurasian Badger (Meles meles) (2010), Brown Hare (Lepus europaeus) (2007-2011), Whiskered Bat (Myotis mystacinus) (2012), Noctule Bat (Nyctalus noctula) (2012), Soprano Pipistrelle (Pipistrellus pygmaeus) (2013)

18 - [SJ6587]

Taxon group	Taxon name
BIRD	Kingfisher (Alcedo atthis) (2004)
CONIFER	Yew (Taxus baccata) (2014)
FLOWERING PLANT	Bluebell (Hyacinthoides non-scripta) (2014), Indian Balsam (Impatiens glandulifera) (2012), Alder (Alnus glutinosa) (2004-2014), Garden Angelica (Angelica archangelica) (2004), Japanese Knotweed (Fallopia japonica) (2004), False-acacia (Robinia pseudoacacia) (2014), Nuttall's Waterweed (Elodea nuttallii) (2004-2009)
INSECT - MOTH	Cinnabar (Tyria jacobaeae) (2002)
MOSS	Freiberg's Screw-moss (Tortula freibergii) (2008)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2018), Brown Long-eared Bat (Plecotus auritus) (2018), Myotis bat species (Myotis) (2018), Eurasian Badger (Meles meles) (2014), Noctule Bat (Nyctalus noctula) (2018), Soprano Pipistrelle (Pipistrellus pygmaeus) (2018)

19 - [SJ6681]

Taxon group	Taxon name
INSECT - DRAGONFLY (ODONATA)	Common Darter (Sympetrum striolatum) (2002)

20 - [SJ6682]

Taxon group	Taxon name
BIRD	Sparrowhawk (Accipiter nisus) (2020)

TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2010)

21 - [SJ6683]

Taxon group	Taxon name
AMPHIBIAN	Common Toad (Bufo bufo) (2019), Common Frog (Rana temporaria) (2019), Smooth Newt (Lissotriton vulgaris) (2019)
BIRD	Buzzard (Buteo buteo) (2008-2015), Kestrel (Falco tinnunculus) (2012), Long-tailed Tit (Aegithalos caudatus) (2008), Lapwing (Vanellus vanellus) (2008), Pied Wagtail (Motacilla alba) (2014), Swallow (Hirundo rustica) (2020), Snipe (Gallinago gallinago) (2008)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2010), Eurasian Badger (Meles meles) (2005-2019), Brown Rat (Rattus norvegicus) (2014), Soprano Pipistrelle (Pipistrellus pygmaeus) (2010)

22 - [SJ6684]

Taxon group	Taxon name
BIRD	Barn Owl (Tyto alba) (2015), Buzzard (Buteo buteo) (2004)
FLOWERING PLANT	Common Vetch (Vicia sativa subsp. segetalis) (2007), Bluebell (Hyacinthoides non-scripta) (2007), Indian Balsam (Impatiens glandulifera) (2007), Japanese Rose (Rosa rugosa) (2007), Giant Hogweed (Heracleum mantegazzianum) (2007), Alder (Alnus glutinosa) (2007), Rhododendron ponticum (Rhododendron ponticum) (2007), Wood-sorrel (Oxalis acetosella) (2007-2015)
INSECT - MOTH	Cinnabar (Tyria jacobaeae) (2004-2005)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2010), European Rabbit (Oryctolagus cuniculus) (2014-2015), Eurasian Badger (Meles meles) (2005-2020)

23 - [SJ6685]

Taxon group	Taxon name
BIRD	Buzzard (Buteo buteo) (2010-2011)
FLOWERING PLANT	Alder (Alnus glutinosa) (2013), Ragged-Robin (Silene flos-cuculi) (2013)
TERRESTRIAL MAMMAL	European Rabbit (Oryctolagus cuniculus) (2013), Eurasian Badger (Meles meles) (2013)

24 - [SJ6686]

Taxon group	Taxon name
AMPHIBIAN	Great Crested Newt (Triturus cristatus) (2017)
BIRD	Lapwing (Vanellus vanellus) (2011)
FLOWERING PLANT	Bluebell (Hyacinthoides non-scripta) (2007), Indian Balsam (Impatiens glandulifera) (2007), Japanese Knotweed (Fallopia japonica) (2017), Rhododendron ponticum (Rhododendron ponticum) (2007)
MOSS	Freiberg's Screw-moss (Tortula freibergii) (2008)
TERRESTRIAL MAMMAL	Pipistrelle bat species (Pipistrellus pipistrelles agg.) (2016), Polecat (Mustela putorius) (2007)

25 - [SJ6687]

Taxon group	Taxon name
MOSS	Freiberg's Screw-moss (Tortula freibergii) (2008)

26 - [SJ6782]

Taxon group	Taxon name
FLOWERING PLANT	Black Poplar (Populus nigra subsp. betulifolia) (2004)

27 - [SJ6783]

Taxon group	Taxon name
BIRD	Buzzard (Buteo buteo) (2011-2019), Fieldfare (Turdus pilaris) (2018), Kestrel (Falco tinnunculus) (2013), House Sparrow (Passer domesticus) (2017), Long-tailed Tit (Aegithalos caudatus) (2017), Lapwing (Vanellus vanellus) (2017), Swallow (Hirundo rustica) (2017), Skylark (Alauda arvensis) (2018), Snipe (Gallinago gallinago) (2008), Wren (Troglodytes troglodytes) (2017), Nuthatch (Sitta europaea) (2017)
FLOWERING PLANT	Alder (Alnus glutinosa) (2006)
TERRESTRIAL MAMMAL	Daubenton's Bat (Myotis daubentonii) (2014), Natterer's Bat (Myotis nattereri) (2017), Common Pipistrelle (Pipistrellus pipistrellus) (2014-2017), Brown Long-eared Bat (Plecotus auritus) (2017), Noctule Bat (Nyctalus noctula) (2017), West European Hedgehog (Erinaceus europaeus) (2016), Soprano Pipistrelle (Pipistrellus pygmaeus) (2014-2017)

28 - [SJ6784]

Taxon group	Taxon name
AMPHIBIAN	Great Crested Newt (Triturus cristatus) (2020), Common Toad (Bufo bufo) (2008), Common Frog (Rana temporaria) (2008)
BIRD	Grey Heron (Ardea cinerea) (2017), Buzzard (Buteo buteo) (2015-2018), Skylark (Alauda arvensis) (2005), Starling (Sturnus vulgaris) (2017)
FLOWERING PLANT	Dittander (Lepidium latifolium) (2010), Alder (Alnus glutinosa) (2012)
INSECT - BEETLE (COLEOPTERA)	Platyderus depressus (Platyderus depressus) (2009)
INSECT - MOTH	Dusky Thorn (Ennomos fuscantaria) (2006), Brown-spot Pinion (Agrochola litura) (2006), Mouse Moth (Amphipyra tragopoginis) (2006), Large Wainscot (Rhizedra lutosa) (2006), Beaded Chestnut (Agrochola lychnidis) (2006), Cinnabar (Tyria jacobaeae) (2003), Rosy Rustic (Hydraecia micacea) (2006), Oak Hook-tip (Watsonalla binaria) (2006)
REPTILE	Common Lizard (Zootoca vivipara) (2008)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2010-2020), Brown Long-eared Bat (Plecotus auritus) (2004-2017), Eurasian Badger (Meles meles) (2004-2019), Noctule Bat (Nyctalus noctula) (2017), West European Hedgehog (Erinaceus europaeus) (2017), Soprano Pipistrelle (Pipistrellus pygmaeus) (2017)

29 - [SJ6785]

Taxon group	Taxon name
BIRD	Lapwing (Vanellus vanellus) (2004)
CONIFER	Yew (Taxus baccata) (2015)
FLOWERING PLANT	Bluebell (Hyacinthoides non-scripta) (2015), Indian Balsam (Impatiens glandulifera) (2015), Alder (Alnus glutinosa) (2015), Rhododendron ponticum (Rhododendron ponticum) (2015), Wood-sorrel (Oxalis acetosella) (2015)
TERRESTRIAL MAMMAL	European Rabbit (Oryctolagus cuniculus) (2015), Brown Hare (Lepus europaeus) (2004-2007)

30 - [SJ6786]

Taxon group	Taxon name
BONY FISH (ACTINOPTERYGII)	Pike (Esox lucius) (2003)
CONIFER	Yew (Taxus baccata) (2013-2015)

FLOWERING PLANT	Box (Buxus sempervirens) (2013), Bluebell (Hyacinthoides non-scripta) (2015), Indian Balsam (Impatiens glandulifera) (2008-2015), Alder (Alnus glutinosa) (2015), Rhododendron ponticum (Rhododendron ponticum) (2008-2015), Wood-sorrel (Oxalis acetosella) (2015)
TERRESTRIAL MAMMAL	Common Pipistrelle (Pipistrellus pipistrellus) (2014-2017), Noctule Bat (Nyctalus noctula) (2014), West European Hedgehog (Erinaceus europaeus) (2005)

31 - [SJ6883]

Taxon group	Taxon name
BIRD	Buzzard (Buteo buteo) (2020)
INSECT - MOTH	Cinnabar (Tyria jacobaeae) (2004)
TERRESTRIAL MAMMAL	Brown Hare (Lepus europaeus) (2017)

32 - [SJ6884]

Taxon group	Taxon name
BIRD	Buzzard (Buteo buteo) (2007), Starling (Sturnus vulgaris) (2015)
FLOWERING PLANT	Alder (Alnus glutinosa) (2006), Japanese Knotweed (Fallopia japonica) (2006), Turkey Oak (Quercus cerris) (2006)
INSECT - BUTTERFLY	Wall (Lasiommata megera) (2015)
TERRESTRIAL MAMMAL	Eurasian Badger (Meles meles) (2004-2021)

33 - [SJ6886]

Taxon group	Taxon name
FLOWERING PLANT	Bluebell (Hyacinthoides non-scripta) (2004), Indian Balsam (Impatiens glandulifera) (2004), Alder (Alnus glutinosa) (2004), Japanese Knotweed (Fallopia japonica) (2004), Rhododendron ponticum (Rhododendron ponticum) (2004)

34 - [SJ68H]

Taxon group	Taxon name
FLOWERING PLANT	Bluebell (Hyacinthoides non-scripta) (2016), Alder (Alnus glutinosa) (2016), Rhododendron ponticum (Rhododendron ponticum) (2016)

Site Boundary Report

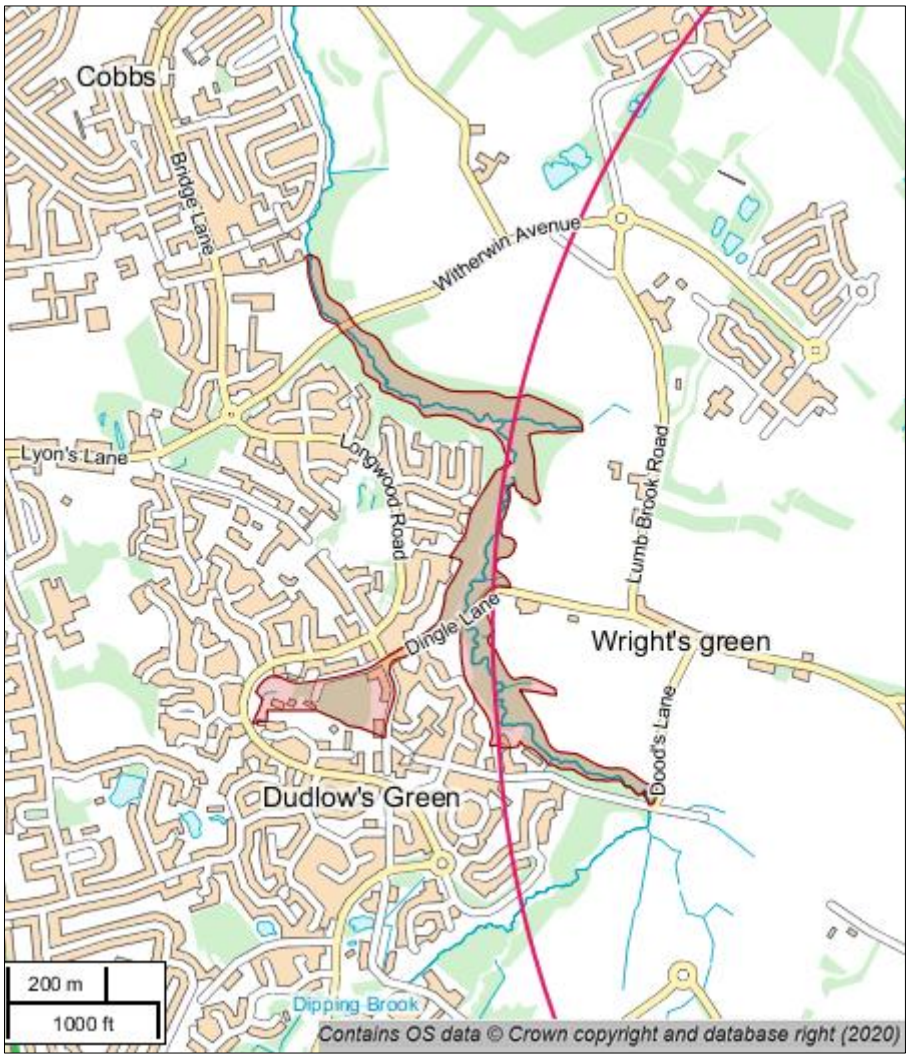
Local Sites

Local Wildlife Sites

This search area covers Cheshire East, Cheshire West and Chester and Warrington. RECORD can only provide Local Wildlife Site information for the area within Cheshire East and Warrington For Local Wildlife Site information for the in Cheshire West and Chester please contact Andrea Powell at Cheshire Wildlife Trust (apowell@cheshirewt.org.uk).

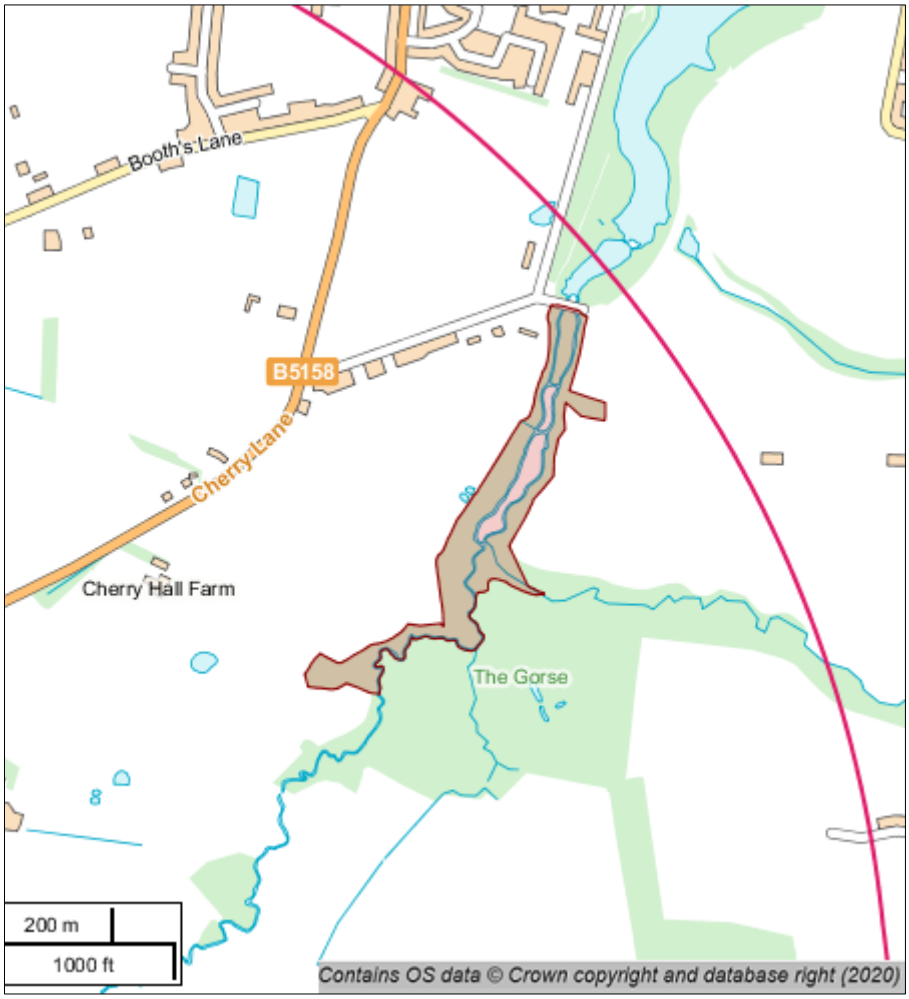
The Dingle and Ford's Rough / WA035

Map



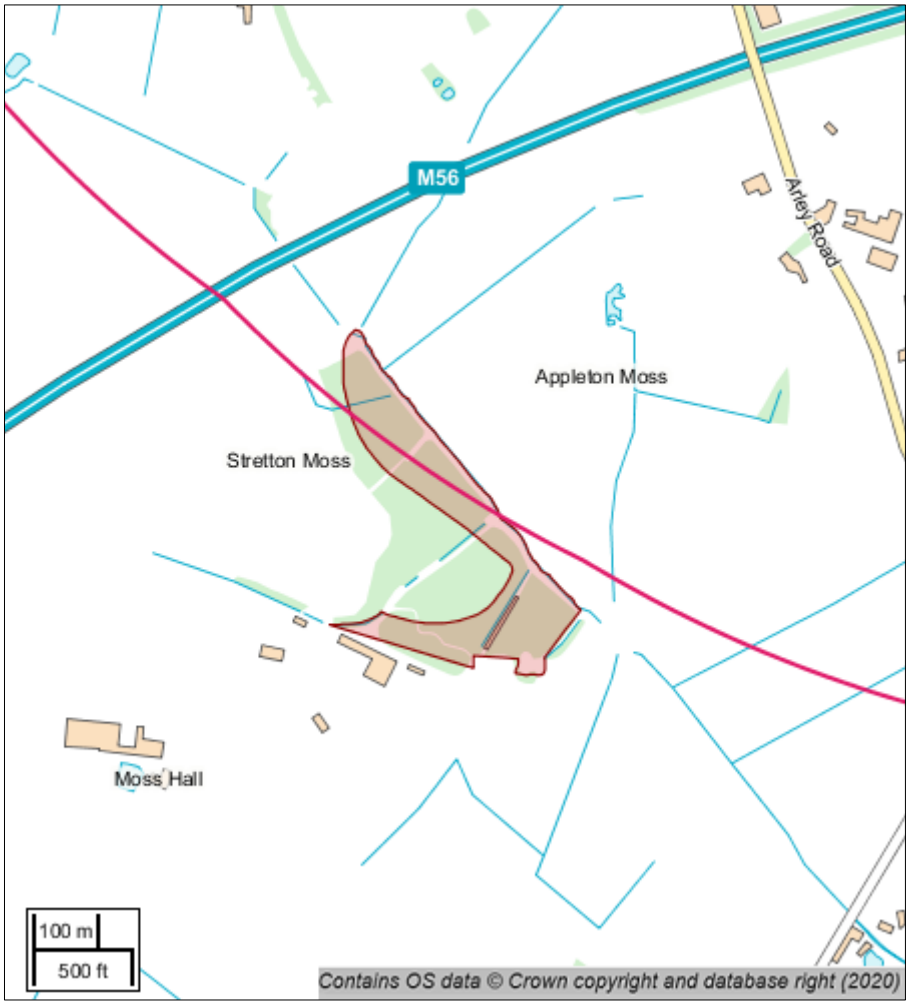
Site name	The Dingle and Ford's Rough
Site code	WA035
Authority	Warrington Local Wildlife Sites Partnership
Site centroid	SJ6262884716

Map



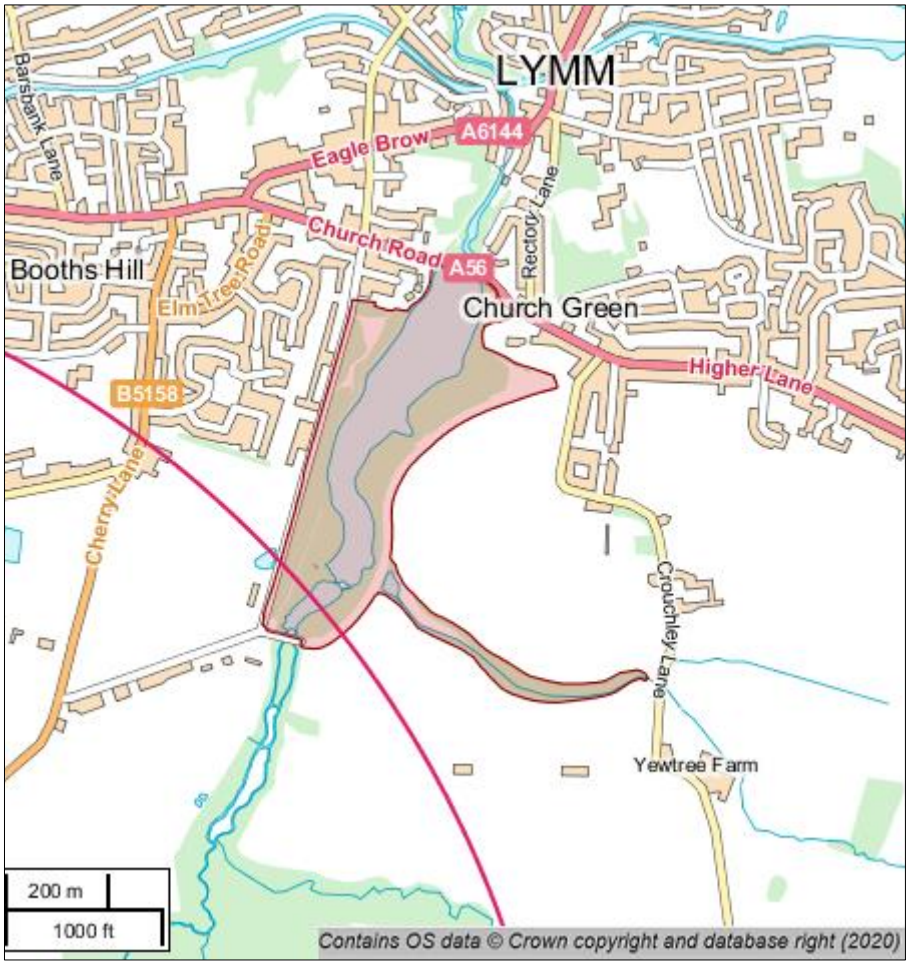
Site name	The Bongs and the Gorse
Site code	WA034
Authority	Warrington Local Wildlife Sites Partnership
Site centroid	SJ6769185885

Map



Site name	Stretton Moss
Site code	WA033
Authority	Warrington Local Wildlife Sites Partnership
Site centroid	SJ6391682488

Map

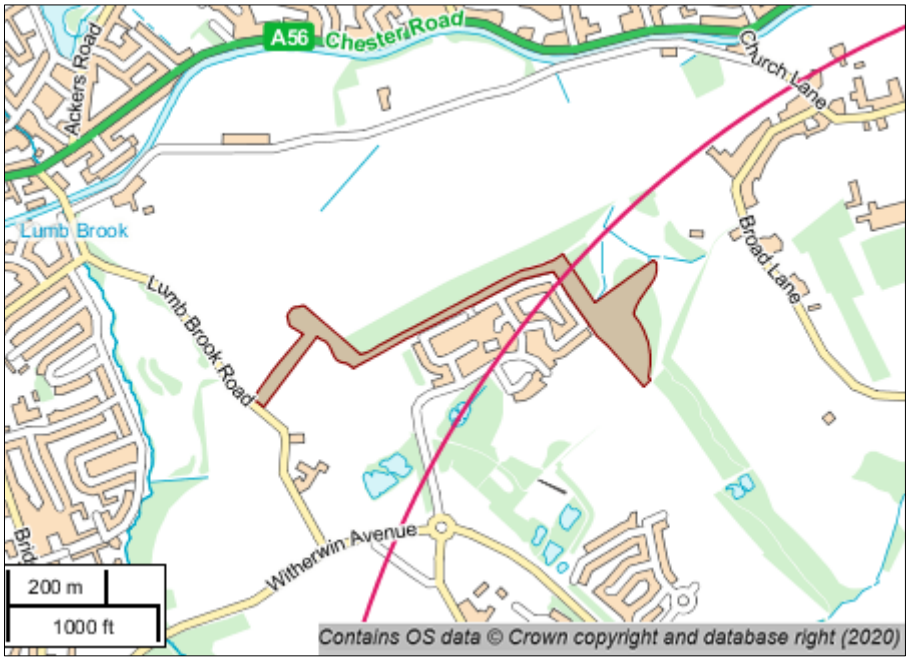


Site name	Lymm Dam Complex
Site code	WA020
Authority	Warrington Local Wildlife Sites Partnership
Site centroid	SJ6803786570

Map

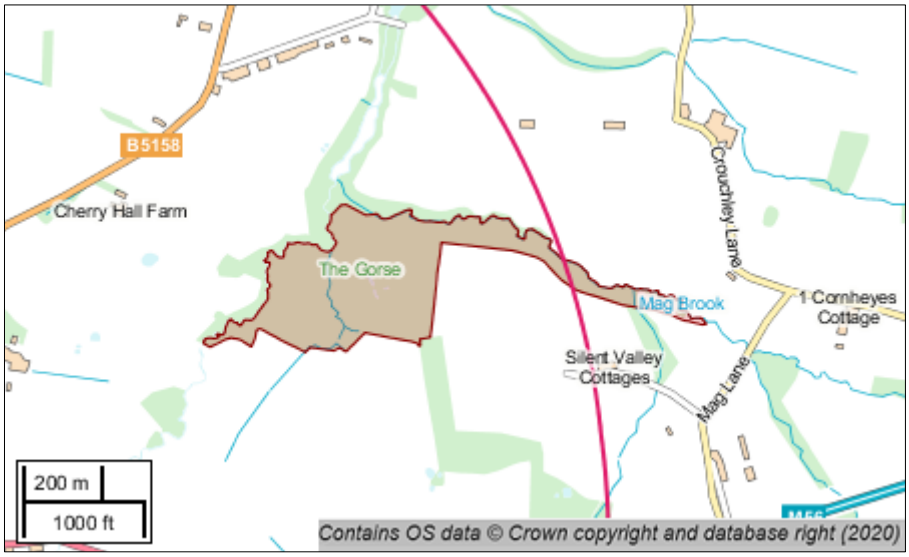
Site name	Grappenhall Heys_A
Site code	WA012
Authority	Warrington Local Wildlife Sites Partnership
Site centroid	SJ6310785558

Map



Site name	Grappenhall Heys_B
Site code	WA012
Authority	Warrington Local Wildlife Sites Partnership
Site centroid	SJ6308385833

Map



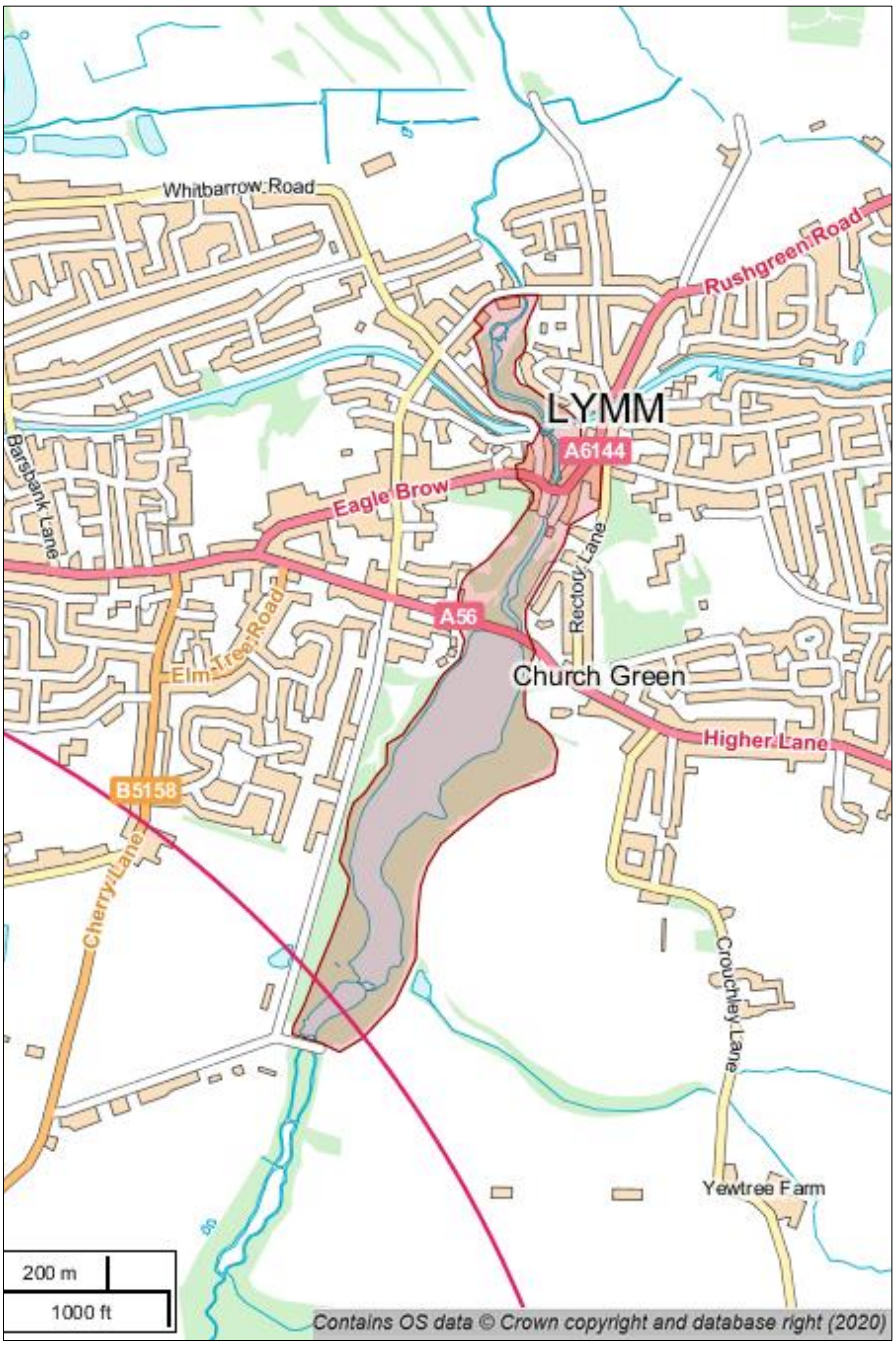
Site name	THE BONGS AND THE GORSE
Site code	CE318
Authority	Cheshire East Local Wildlife Sites Partnership
Site centroid	SJ6783085589

Regionally Important Geodiversity Sites

For further information or citations for these Regionally Important Geological Sites please contact Steve Woolfall (steve.woolfall@cheshirewest andchester.gov.uk) or Cynthia Burek (c.burek@chester.ac.uk) from the Cheshire RIGS group.

Lymm Dam / CH050

Map



Site name	Lymm Dam
Site code	CH050
Authority	Cheshire Regionally Important Geological Sites (RIGS) Committee
Site centroid	SJ6808486805

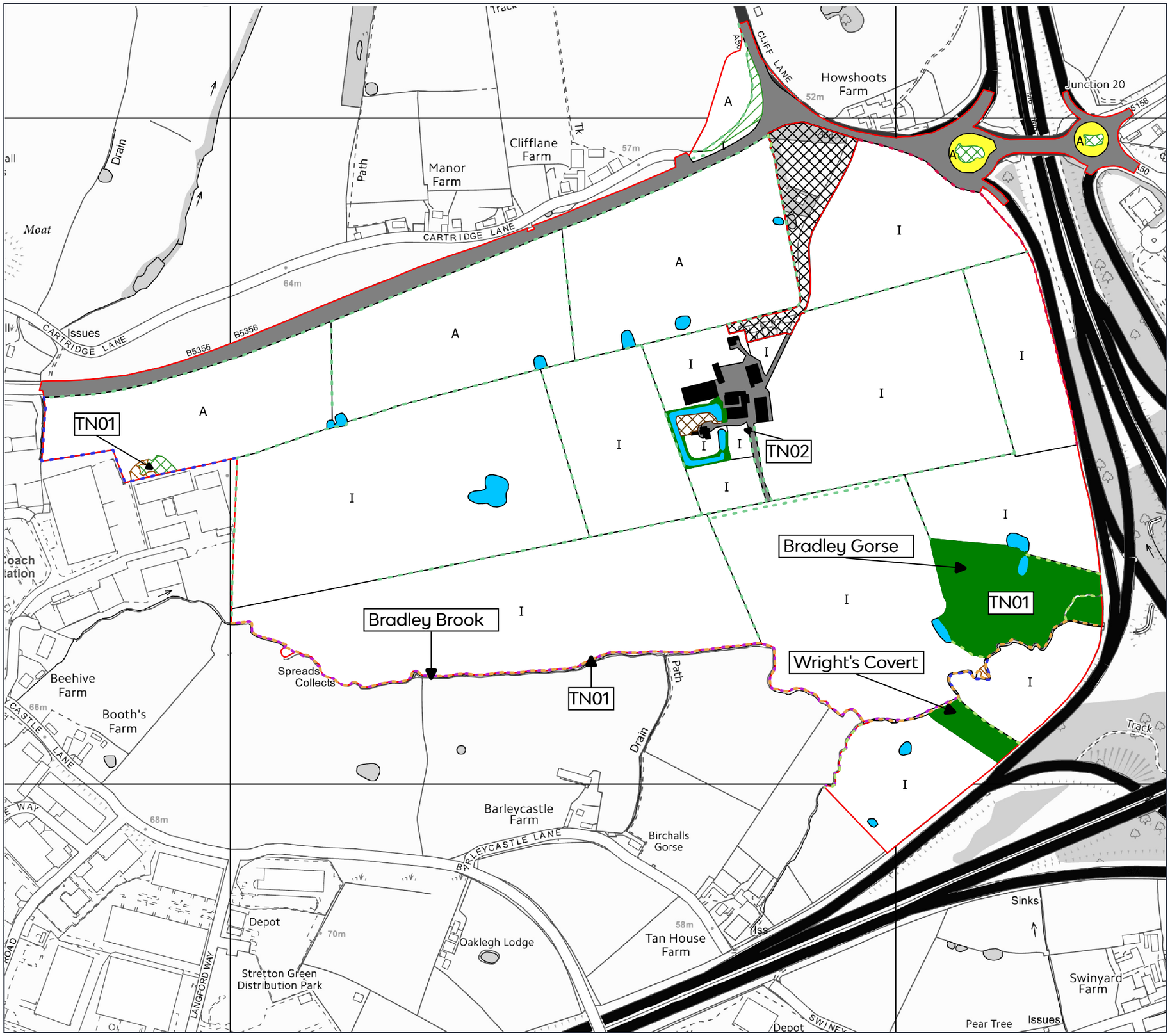
Statutory Sites

Due to changes to the NBN we are currently unable to provide Statutory Site location maps. You can access these by visiting the NBN Atlas https://spatial.nbnatlas.org or MagicMap http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx (please be aware of the NBN Atlas guidance for using data https://nbnatlas.org/help/guidance-using-data).

Other Sites of Conservation Interest

There are no Other Sites of Conservation Interest within this search area.

Fig 5.1 – Habitat Features Plan



Site Boundary

Phase 1 Habitats

- Pond
- A — Amenity Grassland
- A — Arable
- Building
- Hardstanding
- I — Improved Grassland
- Broadleaved Woodland (Plantation)
- Outside Site
- Semi-natural Broadleaved Woodland
- Introduced Shrub
- Dense Scrub
- Tall Ruderal

Line Habitats

- Brook
- Ditch
- Hedgerow Species Poor Intact
- Hedgerow Species Rich
- Hedgerow Species Rich Defunct
- Tree Line

0 50 100 150 200 m

Project	Six56 Warrington
Drawing Title	Habitat Features Plan
Scale	As Shown (Approximate)
Drawing No.	10682_P01c
Date	March 2023
Checked	JD

Tyler Grange

3 Jordan Street, Deansgate, Manchester, M15 4PY
T: 0161 236 8367 E: info@tylergrange.co.uk W: www.tylergrange.co.uk

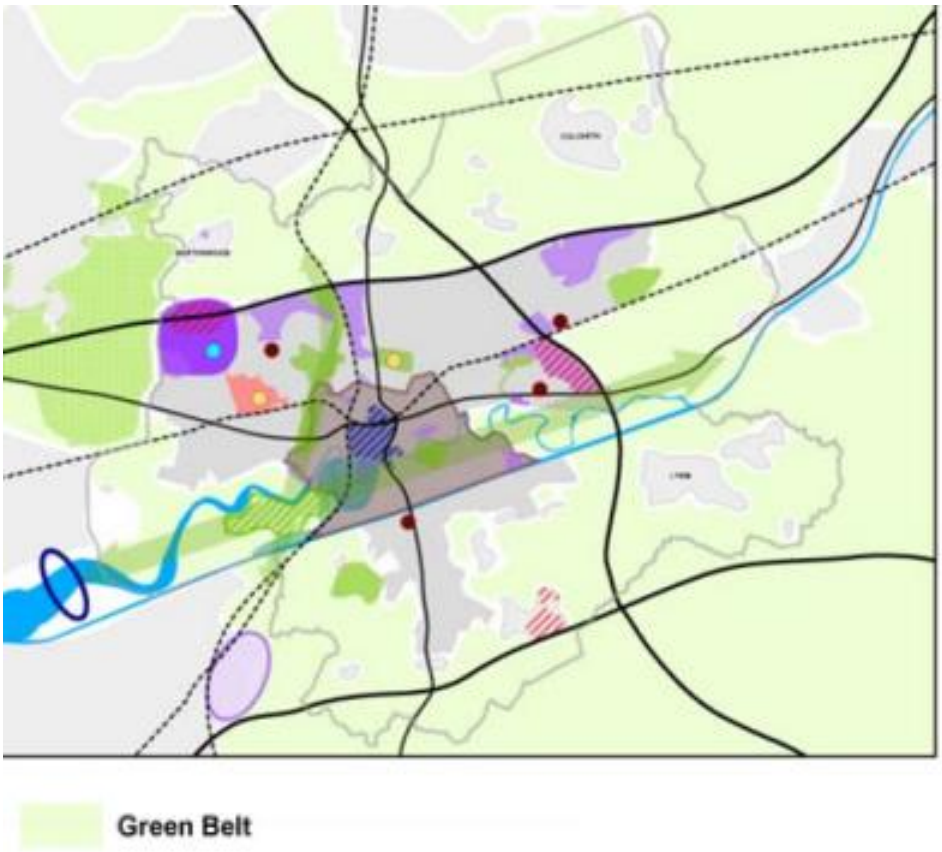
Tyler Grange Group Ltd
© Crown copyright and database rights 2023 Ordnance Survey 0100031673

Appendix DR09 – Local Green Belt Assessment Note

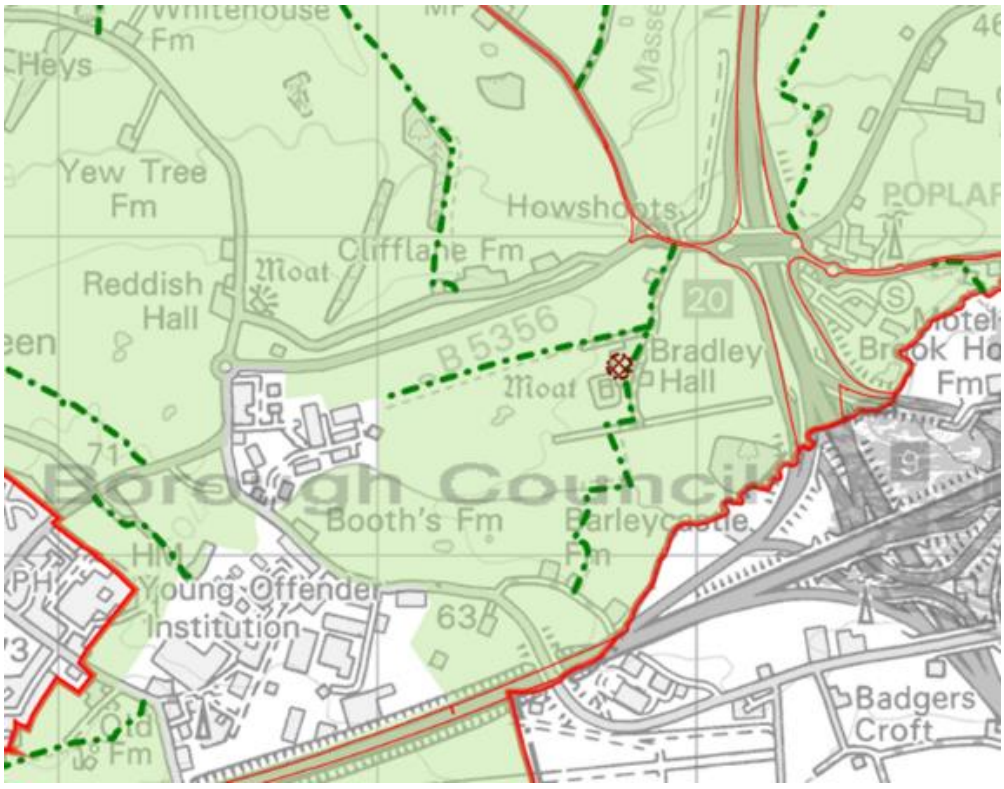
Local Green Belt Assessment Note

Warrington Local Plan Core Strategy (July 2014)

1.1. The Key Diagram from the Local Plan Core Strategy identifies the current Green Belt boundaries and is shown below:-



1.2. 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.



Warrington Borough Council Local Plan Green Belt Assessment Final Report (October 2016)

1.3. Warrington Borough Council 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 and the study area is set out below.

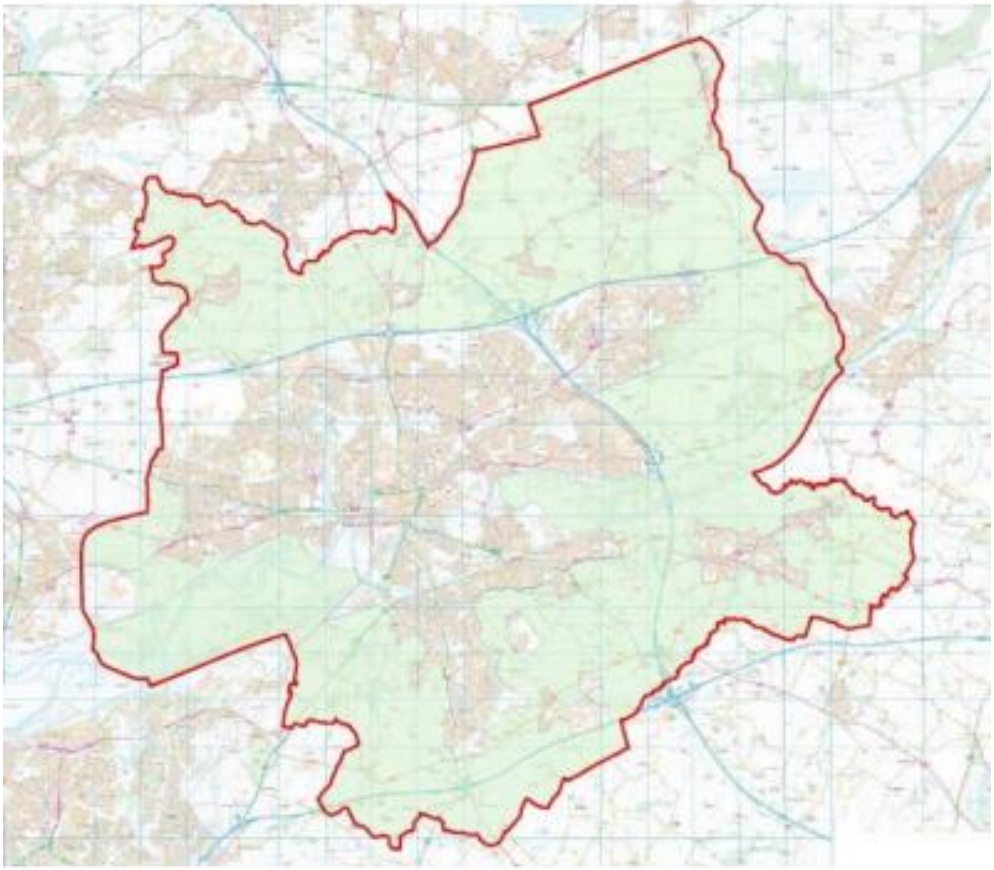


Figure 1: Warrington Green Belt boundary. Source: GIS datasets provided by WBC.

1.4. It identified that the Warrington Green Belt is contiguous with the Green Belt in Merseyside, Greater Manchester and North Cheshire. It also identified that Lymm and Culcheth are the largest of the outlying settlements that are surrounded by the Green Belt. The Report identified 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.

1.5. 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 largely based upon the designation established in 1979.

1.6. The Council's Green Belt Assessment Report set out its assessment of the Borough's Green Belt to understand how it performed 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. The Application Site is located within General Area (GA) 10.

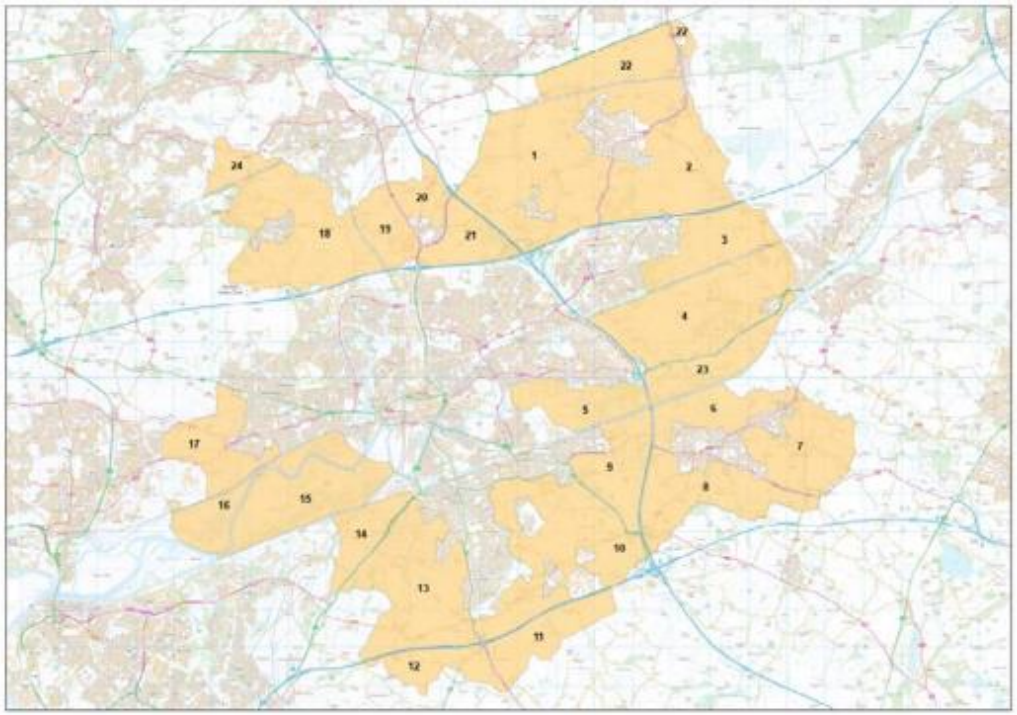


Figure 7: General Area Division (Ref: Map GA2)

1.7. The Stage 1 Assessment confirmed that GA10 made a "*weak*" contribution to Green Belt overall, one of only two General Areas to be categorised as such:-

The choropleth map below illustrates the General Area Assessment outcomes:

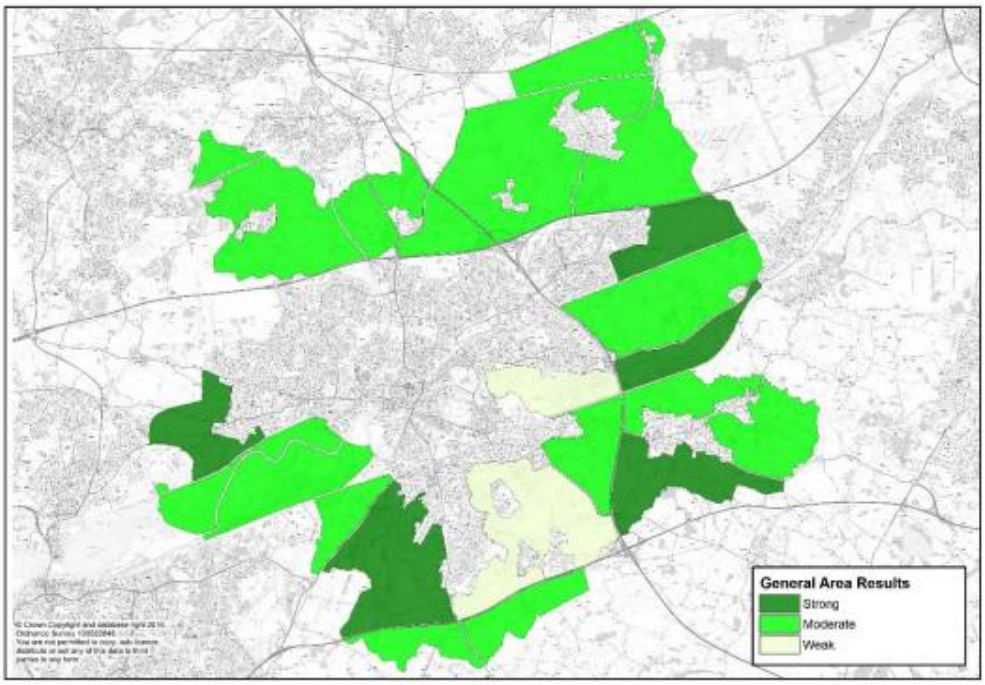


Figure 8. Choropleth mapping showing results of General Area Assessment

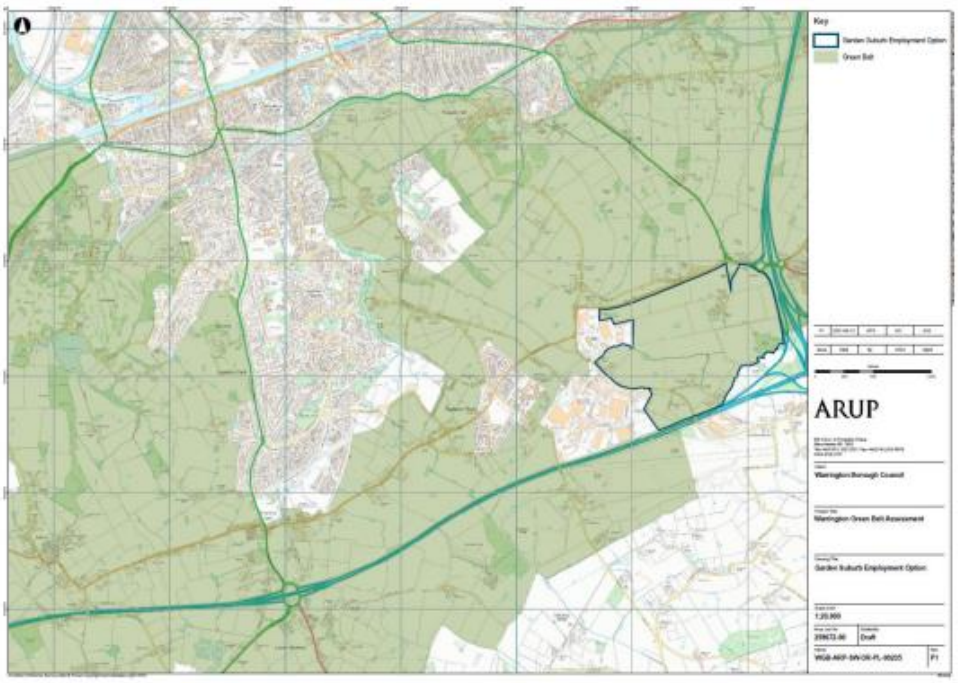
1.8. The Stage 1 Assessment confirmed that GA10 made a "*weak*" contribution to purpose 1 of the Green Belt purposes, recognising that there could be potential for rounding off of the settlement pattern if this land was released from the Green Belt. It also recognised that the parcel is within a wide gap between the Warrington urban area and Lymm which is already separated by the M6 and therefore does not play a role in preventing towns from merging (purpose 2). It also acknowledges that the M56 and M6 provided durable boundaries which would prevent encroachment beyond the General Area if this land was to be released from the Green Belt and hence it makes a "*weak*" contribution to purpose 3. It went onto say that the General Area makes a "*weak*" contribution to purpose 4, given there is a large separation between Warrington Parish Church and the General Area and it provides a "*moderate*" contribution to purpose 5 due to the small percentage of brownfield land

which assists in urban regeneration. In line with the Stage 1 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.

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

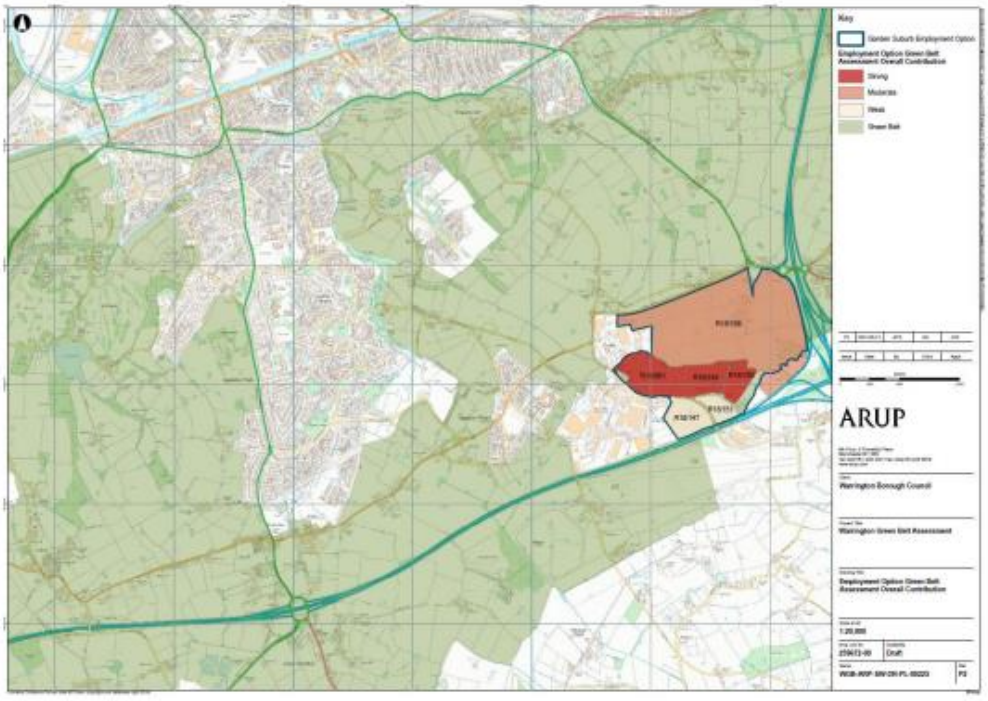
1.9. Proposed Submission Version Local Plan (2021) was supported by updated Green Belt Assessments. Of particular relevance to the Application proposals are the "*Green Belt Assessment – Garden Suburb Options*" (April 2021) and the "*Green Belt Site Selection – Implications of Green Belt Release*" (August 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



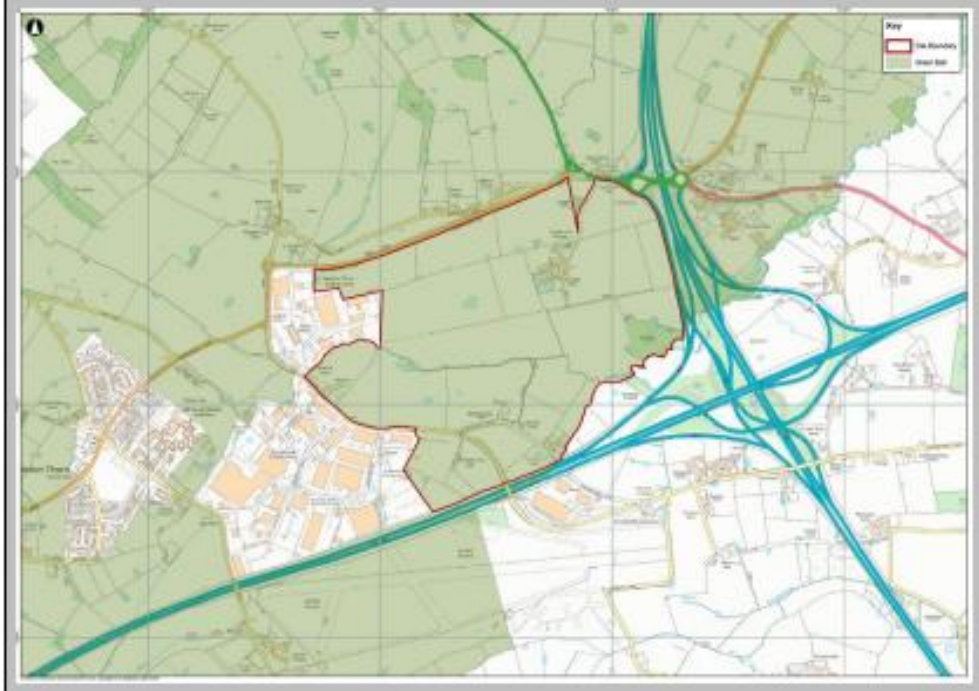
1.10. The "*Green Belt Assessment – Garden Suburbs Option*" (April 2021) assesses the draft allocation land parcels in terms of their "*overall contribution*" to the Green Belt. The plan below confirms that the Application Site (referred to as R18/106) has a "*moderate*" overall contribution to the Green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

Figure 10. Sites within the Employment Option



1.11. 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 following table:

South East Warrington Employment Allocation



Context: 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.

Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	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. 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.
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	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

	defined along strong permanent boundaries to the north, east and south (the M6, M56 and the B5356). Purpose 2 – Development of the site would have no impact on preventing neighbouring towns from merging. Purpose 3 – Development of the site would entail an incursion into undeveloped countryside. 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.
Are there any cumulative impacts (due to release of adjacent sites)?	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). 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.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	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.
Conclusion	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.

1.12. 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*".

1.13. These conclusions relate to the whole draft allocation of which the Application Site forms part. The Application Site has a "*moderate*" impact on the Green Belt when compared to other parcels that have a "*strong*" overall contribution to the Green Belt.