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BY EMAIL ONLY

Dear Ms Gough

Planning consultation: Outline Planning (Major) - 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 B1(a) offices) including change of use of Bradley Hall Farmhouse to B1 (a) office use (335m²) 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.

Location: Land to the west of Junction 20 of the M6 Motorway, and Junction 9 of the M56 Motorway and to the south of, Grappenhall Lane/Cliff Lane (known as Six:56 Warrington) Grappenhall, Warrington

Thank you for your consultation on the above which was received by Natural England on 21 May 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Designated sites

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Wetland Nature Recovery Network

The Government's 25 year Environment Plan sets out the UK's ambition to develop "a growing and resilient network of land, water and sea that is richer in plants and wildlife" and an objective of establishing a Nature Recovery Network. Natural England's Cheshire to Lancashire Team have developed an Wetland Nature Recovery Network across Cheshire and Greater Manchester, which identifies existing wetland assets and where this network could and should be enhanced to improve its coherence and resilience. The network has been mapped and modelled by Natural England. It shows a Wetland Nature Recovery Network of existing core sites, fragmentation zones, enhancement zones and areas of expansion to buffer the existing wetland network and enhance its resilience and increase natural capital benefits. This network has been created using data which describes the underpinning conditions which are suitable for wetlands, including geology and soil characteristics. It is able to predict where the ground is suitable for wetlands and as such allows decisions around where and what type of wetland, both natural and more artificial structures such as Sustainable Drainage Systems, could and should be located in this area.

- **Primary Habitats:** This site contains a number of opportunities that have been identified by the Wetland Nature Recovery Network. These wetland features include a small area of wetland habitat that is either lowland raised bog, lowland fen, reedbeds (priority habitat inventory) and or ponds (from OS MasterMap). The restoration and enhancement of primary habitat should be considered to improve habitat quality where necessary (e.g. scrub management, improving water quality) or increase extent if possible.
- **Fragmentation zone 2:** A small proportion of the site contains land within the network, which connects existing core and primary habitats and is naturally suitable for wetland habitat. The restoration and creation of wetland habitats e.g. rewetting of modified bogs, in these areas should be considered.
- **Enhancement zone 1:** The majority of this site contains land within the network which connects existing and primary habitats and is naturally suitable for wetland habitat. The restoration and creation of wetland habitats e.g. rewetting of modified bogs, in these areas should be considered. Enhancement zones are high priority for restoration or creation, as they represent connecting areas within the network, which could join existing core primary habitats. Conditions on the ground will determine the most appropriate action within these areas; restoration to improve habitat quality, creation to increase the extent of existing habitat patches, or provide stepping stones between habitat patches. In addition, this site also contains an area located to the south west of the site where the network connectivity is most restricted due to fragmentation and is less suitable for wetland creation. To bolster the network in these areas, alternative wetland creation should be considered e.g. SuDs or lined ponds.

For detailed bespoke and technical advice to ensure the masterplan proposals are supportive of the Wetland Nature Recovery Network, the Natural England Discretionary Advice Service (DAS) is available that enables developers and scheme promoters to take into account all environmental considerations of a proposal at the earliest possible stage of a development. DAS minimises the risk of delays in the consultation process, while also securing the best possible outcome for the natural environment. Please see the following link: <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

Best and Most Versatile Agricultural Land

Having considered the proposals as a consultation under the Development Management Procedure Order (as amended), and in the context of Government's policy for the protection of the 'best and most versatile' (BMV) agricultural land as set out in paragraph 170 and 171 of the National Planning Policy Framework, Natural England draws your Authority's attention to the following land quality and soil considerations:

1. Based on the information provided with the planning application, it appears that the proposed development comprises approximately 85.86 ha of agricultural land, including 24.65 ha classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system).
2. Government policy is set out in Paragraph 170 and 171 of the National Planning Policy Framework which states that:

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'

And

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where

consistent with other policies in this Framework^[1]; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

3. Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site. Detailed guidance is available in Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#) (including accompanying [Toolbox Talks](#)) and we recommend that this is followed.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on 02080268326

Yours sincerely

Camilla Davidge

Development and Planning Adviser - Cheshire, Greater Manchester, Merseyside & Lancashire

^[1] Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

Annex A – General Advice

Natural England offers the following additional advice:

Landscape

Paragraph 109 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply the requirements of the NPPF. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in Natural England's [Technical Information Note 049](#).

Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Priority habitats and species

Priority habitats and species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as **Sites of Special Scientific Interest**, on the [Magic](#) website or as **Local Wildlife Sites**. List of priority habitats and species can be found [here](#)². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species is considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

Development provides opportunities to contribute to and enhance biodiversity and the local environment, as outlined in paragraph 109 and 118 of the NPPF. We advise you to consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraph 75 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).