



Examination of the Warrington Local Plan

Examination in Public Hearing Statement for Matter 3

Hearing Statement prepared by Savills (UK) Limited on behalf of
St Modwen Developments Limited

(Respondent No. 1420)

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1. Statement for Matter 3: The Spatial Strategy

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

1.1. This Statement relates to Matter 3, but only concerns the Inspectors' questions in relation to 'Employment land' and 'The Green Belt'. For clarification a Site Plan is included at **Appendix 1**.

Questions and Statement:

Employment Land

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

1.2. The basis of the calculation is set out in the LPA's EDNA. It has been critiqued by Savills (see SENA at Appendix D of **Appendix 2**). It is demonstrably not sound. An alternative and sound calculation has been provided. The LPA's approach is neither robust nor justified. This is a central issue of concern, which goes to the heart of the soundness of the Plan, which will require detailed examination at the EiP.

1.3. While we agree with the Council that labour demand methods underestimate demand, it is also the case that the Council's historic take-up rate method is not a justified approach for assessing the requirements for employment land to be allocated in Warrington. Accordingly, the approach to calculating its employment land supply that form its policy allocations for new employment sites is neither robust nor justified.

- 1.4. Section 3.3 of the SENA (Appendix D of the Local Plan Promotion Document included at **Appendix 2**) demonstrates that an analysis of historic take-up rates is a supply measure rather than a demand measure. While new floorspace can be delivered on existing sites through redevelopment and intensification, it mainly depends on new employment sites being made available (allocated) for development via the planning system. The length of time and complexities involved in delivering sites is why supply measures (such as completions) typically lag behind actual demand (net absorption). Therefore, the use of a lagging supply measure, and the projection of this forward into the future, can underestimate 'true' market demand. In this regard, the Council's (see EDNA (2021)) use of historic take-up rates and a three year buffer to account for demand above the historic completions trend is not positively prepared or justified as it does not meet objectively assessed needs. It is therefore not an appropriate strategy for allocating employment land.
- 1.5. In essence, by using historic take-up as a measure of future demand, the Council and its consultant are advancing a case that the Council's ability, or willingness to allocate land, is a true measure of market demand.
- 1.6. The Council's evidence sets out that historic trends over a period back to 1996 gives an accurate picture of future market demand. This is not the case given current day growth drivers underpinning I&L demand are much stronger than they have been historically. Housing stock and populations continue to grow, each home on average spends more online today than in the past, more freight is handled in the UK now than in the past, and global supply chain shocks have increased reshoring and stock piling requirements.
- 1.7. Savills has developed a future demand methodology which addresses the fundamental flaws of the historic take up rate and labour demand methodology. The Savills methodology is outlined in Section 6 of the SENA (Appendix D at **Appendix 2**). The methodology is compliant with the requirements of the Planning Practice Guidance ('PPG') as it:
- *Analyses 'market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies'¹. If a market is identified as being supply constrained (i.e. demand exceeds supply) such as Warrington, the Savills model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints. On the other hand, by projecting forward the historic supply trend, the EDNA is not*

¹ In accordance with PPG, Paragraph: 031 Reference ID: 2a-031-20190722

responding to market signals and assessing future employment land requirements for I&L development. By contrast, basing demand on take up rates over a period from 1996 is not sound; and

- Applies *'economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector.'*² The Savills method quantifies how much I&L floorspace growth is linked to current and future e-commerce growth which is the major growth driver for the sector driving both demand for the supply-chain, and also the manufacturing of goods. On the other hand, the EDNA's historic trend approach and look back period to the mid-90s has little regard to how the sector has changed nor current day and future growth drivers impacting the sector.

1.8. Based on the above, we consider the Savills model to represent industry best practice. It has been endorsed by the British Property Federation ('BPF') in our 'Levelling Up – The Logic of Logistics' report (a copy of which is included at **Appendix 3** for ease of reference).³ The BPF Industrial Board, who commissioned the report, consist of many of the major investors and thought leaders in the I&L sector including St Modwen, The United Kingdom Warehousing Association, IM Properties, Newlands Developments, Segro, GLP, Tritax Symmetry and the BPF itself.

1.9. Facilitating growth in the I&L sector is also a key priority of the NPPF, namely:

- Paragraph 81 which states: *'Planning policies and decisions should help The **approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.** This is particularly important where Britain can be a global leader in driving innovation⁴², and in areas with **high levels of productivity**, which should be able to capitalise on their performance and potential.'*

² Ibid

³ BPF website - <https://bpf.org.uk/our-work/research-and-briefings/levelling-up-the-logic-of-logistics/>

Savills website - https://www.savills.co.uk/research_articles/229130/326244-0#:~:text=A%20thriving%20industrial%20and%20logistics,of%20England%20and%20the%20Midlands.

- Paragraph 83 which states: *'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.**'*

(Savills' emphasis in bold)

1.10. As we discuss in the response to Matter 5, Question 4, the EDNA (2021) does not address the supply shortages facing Warrington's I&L sector, which it references at Pages 30 – 31, by only projecting forward the historic supply trend.

1.11. Therefore, given the EDNA references those supply shortages, it follows that it does not address weaknesses nor does it address future challenges. It therefore does not accord with the requirements of Paragraph 81 of the NPPF. Also, as we reference in Figure 10.2 of the SENA, the I&L sector is one of the most productive and dynamic employment sectors. The only way the U.K. will close the productivity gap to Western European peers is to facilitate growth in the most productive sectors of the economy. Sites located directly adjacent to major motorway junctions such as the site at Junction 21 of the M6 are critical to facilitating this growth in accordance with the requirements of Paragraph 83 of the NPPF.

- 1.12. The continuation of a supply constrained I&L market in Warrington can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance due to expansion. It may also happen that some existing local companies get priced out of the market as they can't afford the increasing rents taking jobs and investment with them. As a result, companies have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the costs of doing business, which has implications for the social and environmental impacts of securing sustainable development. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity in conflict with Paragraphs 81 and 83 of the NPPF.
- 1.13. Accordingly, we do not consider the EDNA has adequately assessed Warrington's objectively assessed needs for Industrial and Logistics floorspace and land, contrary to the NPPF. Therefore, the supply of employment land as allocated in the emerging Local Plan is not robust and it is therefore not considered to be sound as it is not positively prepared or justified. Rather, it is significantly and demonstrably flawed.
- 1.14. Included at **Appendix 4** is commercial market evidence provided by Jonathan Atherton, Savills Head of Industrial and Logistics Agency at Savills who will attend the EiP. The evidence which demonstrates that there is a significant need for I&L floorspace in Warrington which corroborates the objective assessed need included in the SENA.

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

1.15. Given the location of the Omega Extension and the overall demand for floorspace in Warrington, it is justified to include 31.80ha from the Omega Extension in St Helens in the supply for Warrington. However, a greater area of that site should not be included on the basis that planning permission has been granted for 75ha in that area (Reference P/2020/0061/HYBR).

1.16. The evidence that supports this is that in undertaking its decision to recommend that planning permission for the Omega Extension be granted on appeal, the Inspector concluded at Paragraph 12.33 of the Inspector's Report (included at **Appendix 5**) that Warrington Borough Council's evidence justified the designation of 31.80ha of the Omega Extension (which was submitted for outline permission) to support its supply. Accordingly, the remaining areas of the extension (which was submitted for full planning permission) were accounted to meet St. Helens' need for employment as they were not being factored into Warrington's supply / need. That area is for a single occupier in any event (i.e. TJ Morris) and will not be available to the general market in any event.

1.17. Further, we do not consider that St Helen's has sufficient supply to meet its own needs and we discuss this in Paragraphs 7.2.7 to 7.2.9 of the SENA provided at Appendix D of the Local Plan Promotion Document at **Appendix 2**. This would be consistent with the Inspector's decision on the Omega Extension to apportion only 31.80ha from the planning permission towards Warrington's supply.

1.18. As demonstrated at Paragraph 7.2.7 to 7.2.9 of the SENA, we do not consider that St Helens is in a surplus supply position given its own availability rate is just 2.9%. This is well below the England-wide equilibrium rate of 8% and the Warrington-specific equilibrium rate of 9% which is the point at which supply and demand are considered to be in balance. As shown in Table 4.2 of the SENA, St Helen's availability rate is one of the lowest in the wider Function Economic Market Area ('FEMA'). It has also, like the rest of the wider FEMA, experienced strong rental growth at more than twice the rate of inflation between 2011-2021. Low availability, coupled with strong rental growth are clear indicators of demand exceeding supply.

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

1.19. Yes, we agree that the scale of employment land required provides the exceptional circumstances to justify altering the Green Belt. However, and as we discuss in the responses to Matter 5, Questions 1 and 6 and is commented on in detail in the SENA at Appendix D of the Local Plan Promotion Document (**Appendix 2**), we do not consider that the level of need forecast by the Council's consultant is robust evidence under which to prepare a sound local plan. We demonstrate below and will discuss in detail at the hearing sessions that the Council's consultant has significantly underestimated future demand and subsequently need for employment land in the Borough. Accordingly, a wider area of Green Belt is required to be altered to meet the actual objectively assessed need for employment land in Warrington.

22. How were the Main Development Areas for employment (SE Warrington Employment Area and Fiddler's Ferry) selected, what factors were used to assess potential options and what criteria were used?

1.20. No comment provided.

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

1.21. No comment provided, although note our observations that the Council's EDNA does not meet the tests from Paragraph 35 of the NPPF that are required to be met in order for a local plan to be considered sound.

24. How has the process been recorded and documented? What role did the SA have?

1.22. No comment provided.

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

1.23. We reserve the right to comment further on the Council's justification for why the Main Development Areas for employment were chosen, but we confirm that it is not robust for alternative options such as the site to be discounted as there is a substantial level of need that would be unmet by the current Main Development Areas, and particularly given the material contribution that the site would make to meeting that need.

26. Was the methodology applied appropriate and were the conclusions of the process justified?

1.24. Given the significant levels of unmet need for employment development that will not be met by the sites that have been allocated, the conclusions to discount the site from the Main Development Areas are not justified. Further, the Site Profiles for Local Plan Omission Sites, dated June 2022 (Ref. CD03) sets out at Omission site profile: 36, that: *'The Council does not currently have a sufficiently full enough understanding as to whether the constraints identified above can be overcome.'* It has been demonstrated in the Local Plan Promotion Document included at **Appendix 2** that the site is deliverable and a Gant chart timeline showing its delivery well within the emerging Local Plan period is included at **Appendix 6**.

1.25. St. Modwen has sought to discuss the deliverability of the site further with the Council, but unfortunately has not been able to. St. Modwen can produce evidence of contact made to the Council to discuss matters if required, but the overall conclusion is that the methodology applied to discount the site is neither appropriate nor justified.

The Green Belt

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

1.26. The Local Plan seeks to designate two Main Development Areas for employment development. We consider that this provides a limitation on the options for successfully securing development that meets the needs of Warrington and we comment under Matter 6c the potential challenges that are faced in ensuring Fiddler's Ferry is delivered in full over the Plan-period. Accordingly, we consider that where a Council has limited the options for development, safeguarded land should be considered in order to ensure the plan can be 'effective' and compliant with policy. By selecting just two allocations to meet Warrington's employment needs, there is a strong risk that if one is not delivered within the Local Plan-period, the employment strategy within the Plan will not be delivered.

1.27. Further, we have demonstrated that there is a significant need for employment land above that which has been allocated in the emerging Local Plan. Therefore, we also consider safeguarded land should also be identified in order to meet longer-term development needs stretching beyond the emerging Local Plan period and to minimise the number of alterations that would be required to the Green Belt boundary over the long-term. This is particularly where the Council has a stated policy aim in Policy GB1 to not further alter the boundaries of the Green Belt until at least 2050. That policy aim is inconsistent with the Council's commitment to undertaking a review into Warrington's employment land needs before the end of the emerging Local Plan period to ensure the long term supply of employment land can be met (see Paragraphs 4.2.22 and 5.1.19 of the emerging Local Plan).

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

1.28. No comment made.

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

1.29. As set out above, the policy aim of Policy GB1 to not further alter the Green Belt boundaries until at least 2050 is inconsistent with the Council's acknowledgement that employment land needs will need to be assessed before the end of the emerging Local Plan period. Accordingly, the words 'throughout the Plan Period and to at least 2050' would need to be removed from the Policy as it is not justified. It is not an appropriate strategy when it is acknowledged that employment land needs will need to be assessed again before the end of the Local Plan period.

1.30. Further, as we evidence, there is not sufficient land allocated for employment development to meet the level of objectively assessed need required. The deliverability of the site and the meaningful contribution that it will make towards meeting employment land needs provide for exceptional circumstances to allocate the site for employment development under Policy GB1.

1.31. The above are main modifications required in order to ensure Policy GB1 is sound.

Word Count: 2,642



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Hearing Statement prepared by Savills (UK) Limited on behalf of St Modwen Developments Limited

(Respondent No. 1420)

Appendices

Appendix 1 – Site Plan

Appendix 2 – Local Plan Promotion Document, dated November 2021

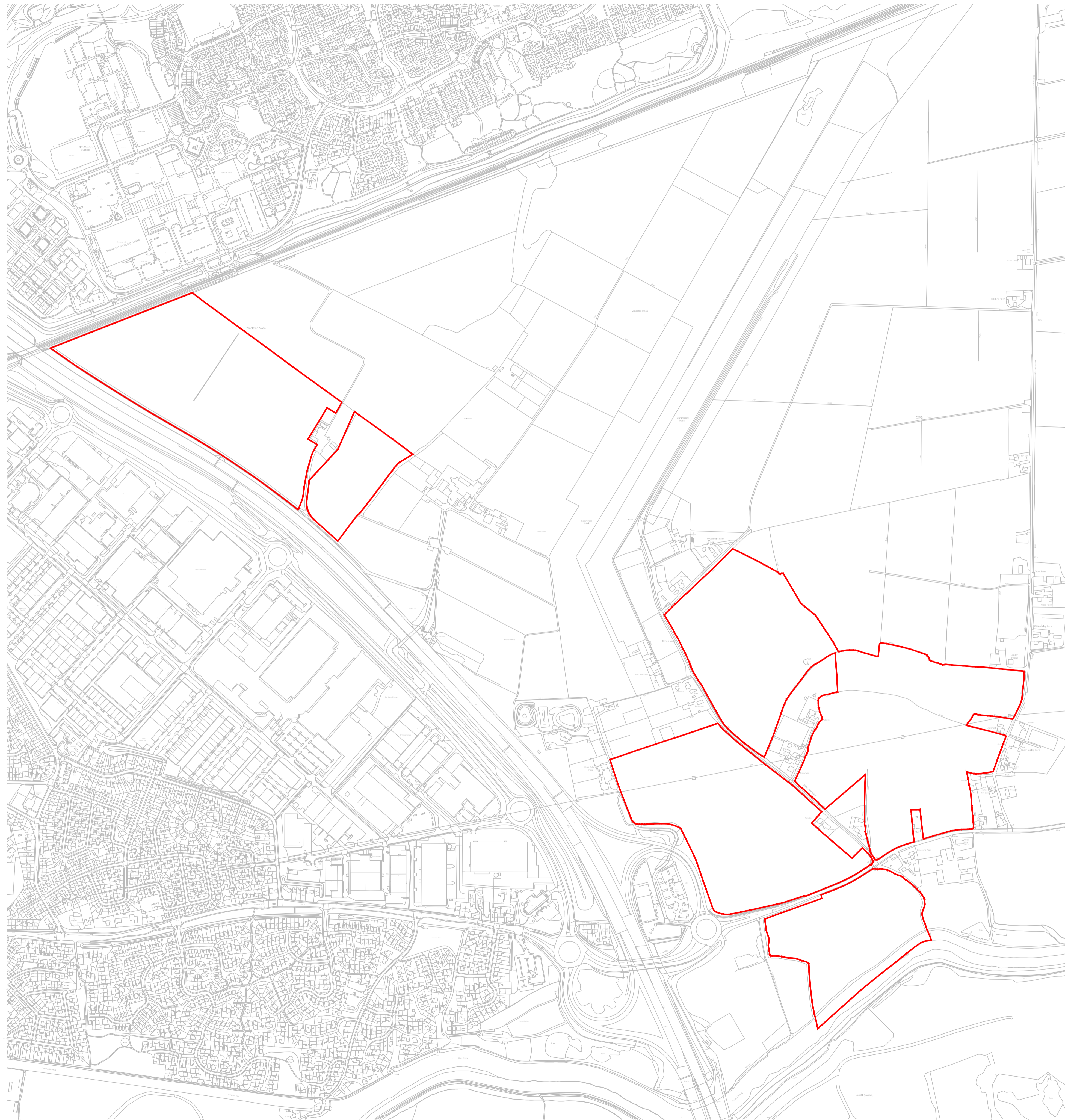
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Appendix 6 – Programme for Delivery for the Development of the site at Junction 21 of the M6

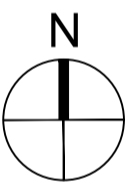
Appendix 1 – Site Plan



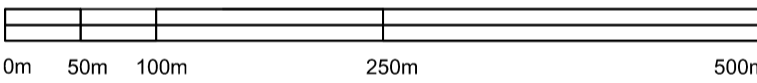
Contractors are not to scale dimensions from this drawing

Key

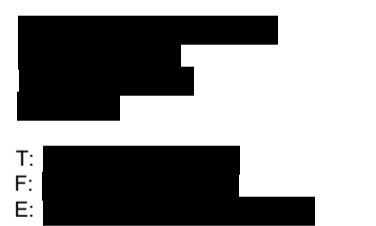
— Site Boundary



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Architecture Urbanism Design



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Client
St. Modwen
Project
Rixton - Junction 21 of the M6

Description
Site Location Plan

Status
DRAFT

| | | |
|------------|----------------|----------|
| Scale | Drawn | Date |
| 1:5000@A1 | BM | July '22 |
| Job number | Drawing number | Revision |
| 34799 | 01-211 | B |

Original size 100mm @ A1 Copyright Broadway Malyan Limited

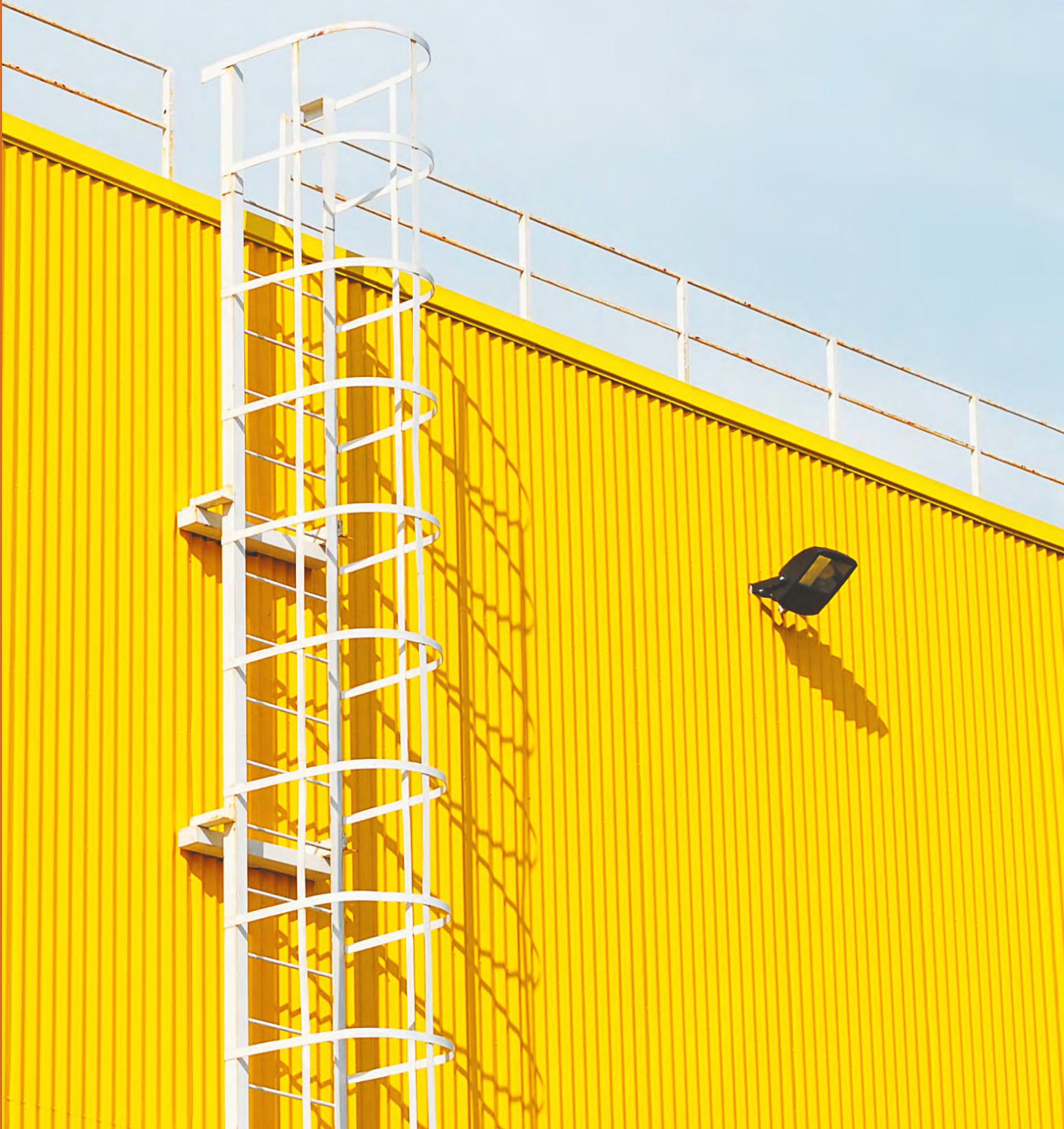
Appendix 2 – Local Plan Promotion Document, dated November 2021



ST.MODWEN

WARRINGTON RIXTON - J21 OF THE M6

November 2021



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1. EXECUTIVE SUMMARY

INTRODUCTION

THE PROMOTION DOCUMENT HAS BEEN PREPARED BY ST. MODWEN DEVELOPMENTS LIMITED TO PROVIDE REPRESENTATIONS ON THE PROPOSED SUBMISSION VERSION LOCAL PLAN 2021 ('THE EMERGING LOCAL PLAN') THAT IS CURRENTLY UNDER CONSULTATION.

The Document relates to the allocation of a site measuring approximately 71.5ha for employment development and associated works including green infrastructure as may be required in order to meet strategic Industrial and Logistics development needs for Warrington.

The site is a highly accessible location on the A57, with immediate access to J21, M6. It provides an exciting opportunity to meet employment growth in Warrington.

The site is presently located in the Green Belt. However, there are no alternative sites within non-Green Belt locations that can meet the identified need for the proposed uses.

All of the land subject to this consultation response is under the control of St. Modwen. St. Modwen can bring considerable experience and knowledge to the deliverability of the site on a national level in terms of Industrial and Logistics development, and on a local level having delivered the Birchwood Park employment development in Warrington. The Birchwood Park site has been developed over the last 30 years and is home to 165 companies. It substantially supports Warrington's economic base. St. Modwen therefore has a unique long-term track-record of employment delivery in Warrington.

The Promotion Document demonstrates the two key requirements that support the allocation of the site, namely that:

1. The allocation of the site would meet an identified need for employment development; and
2. The development of the site is deliverable.

We summarise each in turn below.

MEETING THE IDENTIFIED NEED FOR EMPLOYMENT DEVELOPMENT

Detailed technical analysis that assesses economic development needs in Warrington is included in the Industrial & Logistics ('I&L') Needs Assessment prepared by Savills (UK) Limited at Appendix D of this Document.

The Assessment demonstrates there is a significant shortfall in provision for I&L development in the emerging Local Plan.

The Assessment findings demonstrate that Warrington's future I&L land needs far exceed its existing and planned employment land supply in the emerging Local Plan, with a **shortfall totalling 195.49 ha over the plan-period to 2038.**

Further, having reviewed the information included with the employment allocation at Fiddler's Ferry, the Assessment demonstrates that only approximately half of the employment allocation at Fiddler's Ferry is likely to be delivered within the plan-period up to 2038. Accordingly, this increases the **shortfall to 246.49 ha over the plan period.**

There is therefore an acute need for I&L development in Warrington. The allocation of the site and subsequent proposal for employment development would make a material contribution to the requirement for additional employment development over the plan-period.

The locational characteristics of the site and its highly accessible location close to the strategic road network mean that there will be high demand from the market for I&L development. The proposal will therefore be a successful development in meeting the economic growth requirements for Warrington.

Further, the allocation of the site for employment development will deliver significant economic benefits and social value, including:

- Up to 1,457 operational jobs that will be created for the residents of Warrington at the employment development, generating approximately £53.2m in wages every year.
- Approximately £97.1m gross value added ('GVA') is expected to be generated per annum from on-site employment
- Social value of approximately £31m based on apprenticeship schemes, NHS savings through a reduction in unemployment and through supporting local businesses

THE DEVELOPMENT OF THE SITE IS DELIVERABLE

A key component to ensure the site's allocation is whether it will be deliverable to support meeting the significant need for additional employment development over the plan-period.

As an established national developer with a significant track-record and expertise in major economic development delivery, St. Modwen invests only in projects with a deliverable outcome. This is a critical requirement of its decision to deploy capital and invest and progress development opportunities.

The Promotion Document therefore provides an assessment of key considerations and demonstrates that:

1. There is an appropriate access strategy to provide access to the development site from the A57 for the anticipated land-uses and quantum of development proposed. There is therefore a deliverable access strategy which accords with the requirements for acceptability on highway grounds set out in the National Planning Policy Framework.
2. Any proposed development scheme brought forward for the site would be deliverable, through the use of appropriate mitigation measures where required, without having a deleterious impact upon the ecological receptors present. St. Modwen control significant areas of land that can be used solely for ecological mitigation and biodiversity net gain if required.
3. It has been confirmed by the Environment Agency that the significant majority of the site is located within Flood Zone 1 and the site is at a low risk of surface water flooding. There are no flood risk matters that would prevent the development of the site.
4. A preliminary assessment of ground and groundwater indicates that overall site development is unlikely to be significantly compromised by its natural geology. Similarly, the observed land use history is one which is unlikely to have led to significant land disturbance or ground contamination to an extent which would significantly affect any proposed development or the wider environment.

It follows that there are no known constraints that prevent the deliverability and development of the site.



EXECUTIVE SUMMARY CONCLUSION

THE ASSESSMENT DEMONSTRATES THAT THERE IS A CLEAR LAND-USE PLANNING NEED FOR THE ALLOCATION OF THE SITE FOR EMPLOYMENT USES AND THAT THE DEVELOPMENT WILL BE DELIVERED.

At present, the emerging Local Plan does not meet its objectively assessed need for employment development as demonstrated in the Industrial & Logistics Needs Assessment. It follows that the Plan cannot currently be considered 'sound' as it does not meet the tests included at Paragraph 35 of the National Planning Policy Framework. The emerging Local Plan is not:

1. **Positively** prepared as it does not provide a strategy that meets Warrington's objectively assessed needs.

2. **Justified** as it is not based on proportionate evidence. The proportionate evidence demonstrates that there is a significant requirement for additional land for employment development to meet the area's needs.

3. **Effective** as there are doubts over the complete delivery of a significant employment site in the Plan, based on comparable evidence from sites of a similar nature.

4. **Consistent** with national policy as the Plan does not place 'significant weight' on the need to support economic growth and productivity as required by Paragraph 81 of the National Planning Policy Framework.

In order for the Plan to be found sound, there is a clear requirement for the site to be allocated for employment development. The objectively assessed need requires the Council to re-assess its Green Belt boundary in order to meet that need. As the Council has not done so, the emerging Local Plan cannot be considered to be justified.

We look forward to working with the Council to evolve the emerging Local Plan to ensure that it can be found sound before its submission for Examination and we kindly request a meeting to discuss the exciting opportunity at J21 of the M6 at the earliest opportunity.



2. INTRODUCTION

THIS PROMOTION DOCUMENT HAS BEEN PREPARED BY ST MODWEN DEVELOPMENTS LIMITED TO PROVIDE REPRESENTATIONS ON THE EMERGING LOCAL PLAN.

The Document provides details of the unique and exciting opportunity for the development of the site located at J21, M6, Warrington for employment growth to support Warrington Council's ambitions for growth and action.

The site provides the opportunity to deliver major industrial and logistics development which is critical to the economic growth of both Warrington and the north of England given the strategic location of the site along the M6 and in close proximity to the wider national strategic road network including the M56 and M62.

THE CASE FOR THE PROPOSAL

The site is located within the Green Belt. However, there are 'exceptional circumstances' that are fully evidenced and justified that result in a requirement for Warrington Borough Council to alter its Green Belt boundaries to allocate the site for development. The Promotion Document therefore sets out St Modwen's commitment and evolving strategy to deliver the opportunity given the scale of the development. It demonstrates:

1. There is a substantial need for the proposed development to support Warrington's growth requirements. There is an evidential need that exceeds the need forecast by the Local Planning Authority's advisors, BE Group, in the Warrington Economic Development Needs Assessment Refresh that forms part of the evidence base for the emerging Local Plan. This is a significant positive that supports Warrington's ambitions as a pro-growth location and will enable a wide range and quantum of high quality employment opportunities.
2. There are no known constraints that would prevent the development of the site to meet Warrington's growth requirements.

The above provides the exceptional circumstances to remove the site from the Green Belt. There is a need for the development, the site is deliverable and it meets requirements to meet strategic employment needs.

St. Modwen is committed to working with Warrington Borough Council together with local stakeholders to promote the site and develop a successful and sustainable economic development that meets Warrington's employment needs.

This Document is intended to facilitate constructive and positive discussions with Warrington Borough Council over the allocation of the site for employment purposes within the emerging Local Plan.

THE STRUCTURE OF THE DOCUMENT

The Document is structured as follows:

- **Section 1:** Executive Summary
- **Section 2:** Introduction
- **Section 3:** Background to St Modwen
- **Section 4:** Site Ownership Details
- **Section 5:** Site description including constraints
- **Section 6:** The Proposal
- **Section 7:** The Case for the Allocation – Warrington's Economic Development Needs
- **Section 8:** The Case for the Release of Green Belt Land
- **Section 9:** Highway Considerations
- **Section 10:** Ecological and Environmental Considerations
- **Section 11:** Flooding and Drainage Considerations
- **Section 12:** Technical Engineering Considerations
- **Section 13:** The Planning Case for the Allocation of the Site and the Proposed Allocation
- **Section 14:** Conclusion

1. Warrington's Economic Growth and Regeneration Programme: Warrington Means Business published in December 2017 confirms that Warrington is an area of growth and action (see Page 3 of the Programme: https://www.warrington.gov.uk/sites/default/files/2019-09/warrington_means_business_december_2017.pdf)



THE PROFESSIONAL TEAM

St Modwen is supported by the following professional team who have provided input into this document:

1. **Savills (UK) Limited** as Planning Consultant
2. **Savills (UK) Limited** as Economics Consultant
3. **Broadway Malyan** as Masterplanner
4. **Sweco** as Highway Consultant
5. **SK Environment** as Environmental and Ecological Consultant
6. **HDR Inc** as Flood Risk Engineer
7. **PJA Engineering** as Ground Engineer

ONGOING DIALOGUE

The Promotion Document is submitted in connection with the delivery of land that St. Modwen Developments Limited controls and the case within the Promotion Document justifies the allocation of the site for employment development and associated infrastructure required, including to access that land and further works to support its development.

In the event that the Local Planning Authority is also supportive of proposals that are being promoted on adjoining land for residential-led mixed use scheme, St. Modwen would be open to working with the Local Planning Authority and the adjoining landowners/promoters to agree a joint approach to promotion and delivery.

We welcome the opportunity to review the document and case for the proposal and look forward to working with the Local Planning Authority to delivering St. Modwen's exciting development opportunity through the Local Plan process.

3. BACKGROUND TO ST MODWEN

ST. MODWEN DEVELOPMENTS

ST. MODWEN DEVELOPMENTS LIMITED IS OWNED BY MULTI-NATIONAL INVESTMENT MANAGEMENT COMPANY, BLACKSTONE.

St. Modwen is a financially strong and robust business¹ with an exceptional track record of delivering places that matter across the last 55 years. It's objectives are to create maximum social and financial value through up-front investment in the highest quality development.

St. Modwen has a strong focus on strategic partnerships and enhancing social value through development. It has vast experience in being a masterdeveloper of mixed-use large commercial / industrial / logistics schemes and promoting and delivering significant infrastructure to support such developments and wider communities.

On a local level, St. Modwen is a long-term development partner in Warrington, with a local office at Birchwood. St. Modwen developed and operated the Birchwood commercial area over a 30 year period having acquired the area in the early 1990s. It therefore has a strong local background and knowledge of the delivery of development in the area that the site is located within.

Examples of projects which are of comparable scale, require high levels of strategic infrastructure and demonstrate St. Modwen's ability to leverage in and secure additional and public funding to ensure delivery are:

Branston Leas & Burton Gateway, Staffordshire

St. Modwen secured outline permission for the 280 acre site comprising 660 homes and 1million sq. ft of commercial space.

Over 130 homes have been occupied with a further land sale to Bellway completed in 2018. An 8,000 sq. ft retail centre has been completed, let and sold in addition to a one form entry school extension.

Open space has been provided including 54 acres of woodland working in partnership with the Woodland Trust, National Forestry Commission and Staffordshire Wildlife Trust to assist in delivery and management.

The 1million sq. ft / 50 acre industrial and distribution site is serviced from a new access road direct from the A38 which was completed in May 2017. A new 1km link road between the residential and commercial areas was completed in 2018.

The new access was procured by St. Modwen through negotiation with Highways England. The first speculative warehouse of 87,000 sq. ft. was let to Hellmann in 2017.

Phase 2 consists of three warehouse units totalling 119,250 sq. ft, part of which is occupied by Supply Technologies and Keylite Roof Windows while phase 3 will provide 103,067 sq. ft unit and is due for completion in September 2019. Detailed planning consent is also in place for the Phase 4 of 216,000 sq. ft in four units.

St Modwen Park, Chippenham

St. Modwen Park Chippenham comprises a strategically located 78.2 acre (30.1 ha) development site situated at junction 17 of the M4. The park has an outline planning consent to provide approx 1 million sq ft of warehouse accommodation and can provide units of up to 800,000 sq ft.

Glan Llyn, Newport, Wales

Following the closure of the steel production of the Corus steelworks in 2001, St. Modwen purchased the 600 acre site in 2004, which is one of the largest single regeneration sites in the UK. The £1bn redevelopment will create a sustainable, mixed use development on the eastern edge of Newport, by providing 4,000 new homes, schools, 100 acre 1.25million sq. ft. Celtic Business Park, District Centre and over 150 acres of open space over the next 15 years. The scheme is part funded by St. Modwen through the S106 obligations and part by the Welsh Government. The Welsh Government delivered the infrastructure and St. Modwen will pay its contribution over 15 years. To date the following development has been delivered:

- 600 new homes have been completed by St. Modwen Homes, Persimmon and Bellway;
- The first 215,000 sq. ft and associated works on Celtic Business Park including a new rail manufacturing facility including rail connection and a new distribution facility delivered for Amazon;
- A new two form entry primary school;
- The management of parkland (up to 150 acres) by St. Modwen through the management company and service charges paid by each dwelling / commercial occupier;
- The traffic generated by the development required a new 6km dual carriageway which provides an improved link in and out of Newport to the M4 at Magor;
- The largest foul sewerage pumping stations in Wales; and
- A new primary substation and gas pressure reducing stations to serve the development.

Longbridge, Birmingham

This £1bn regeneration project is situated south west of Birmingham city centre and extends to over 468 acres. Following a major remediation programme across the site, St. Modwen commenced this major new community project in 2007 which is expected to take around 20 years to complete. The development has already delivered:

- Over 500 homes built by St. Modwen Homes and Persimmon;
- New town centre comprising 150,000 sq. ft Marks and Spencer, 88,000 sq. ft Sainsbury's, Beefeater Grill, a 75-bedroom Premier Inn, restaurants and independent retailers, surface and multi-storey car parks;
- The £66million, 250,000 sq. ft Bourneville College;
- Cofton Centre business park and Longbridge Technology Park comprising around 50,000 sq. ft of offices providing opportunities for starter and growing businesses;
- St. Modwen has been granted planning permission for One Park Square which will provide 105,000 sq. ft of prime office space;
- A £35million Extra Care retirement village opened in 2017; and
- A new £17million 180 bedroom residential facility for the MOD's medical and support staff.

A further 1,500 homes will be delivered as well as a further 1million sq. ft of commercial space.

In terms of public sector funding, a Regional Growth Fund application made to the LEP secured £8.5million to upgrade highway infrastructure; bus stop facilities; cycle routes; wayfinding and the local railway station concourse.

1. St. Modwen was a FTSE 250 company until the acquisition by Blackstone this year resulted in the de-listing of the company

4. SITE OWNERSHIP DETAILS

THE SITE IS WITHIN A **SINGLE OWNERSHIP**, OWNED BY ONE FAMILY - THE SHARPE FAMILY.

OWNERSHIP

The Sharpe Family and St. Modwen have entered into a legal agreement together that commits St. Modwen to promoting the site through the emerging Local Plan process and putting forward the case to justify its release from the Green Belt.

There are therefore no ownership constraints that would prevent the development from being delivered. The requisite land to deliver an employment development that meets Warrington's needs is all under the control of an experienced and established strategic employment land developer.

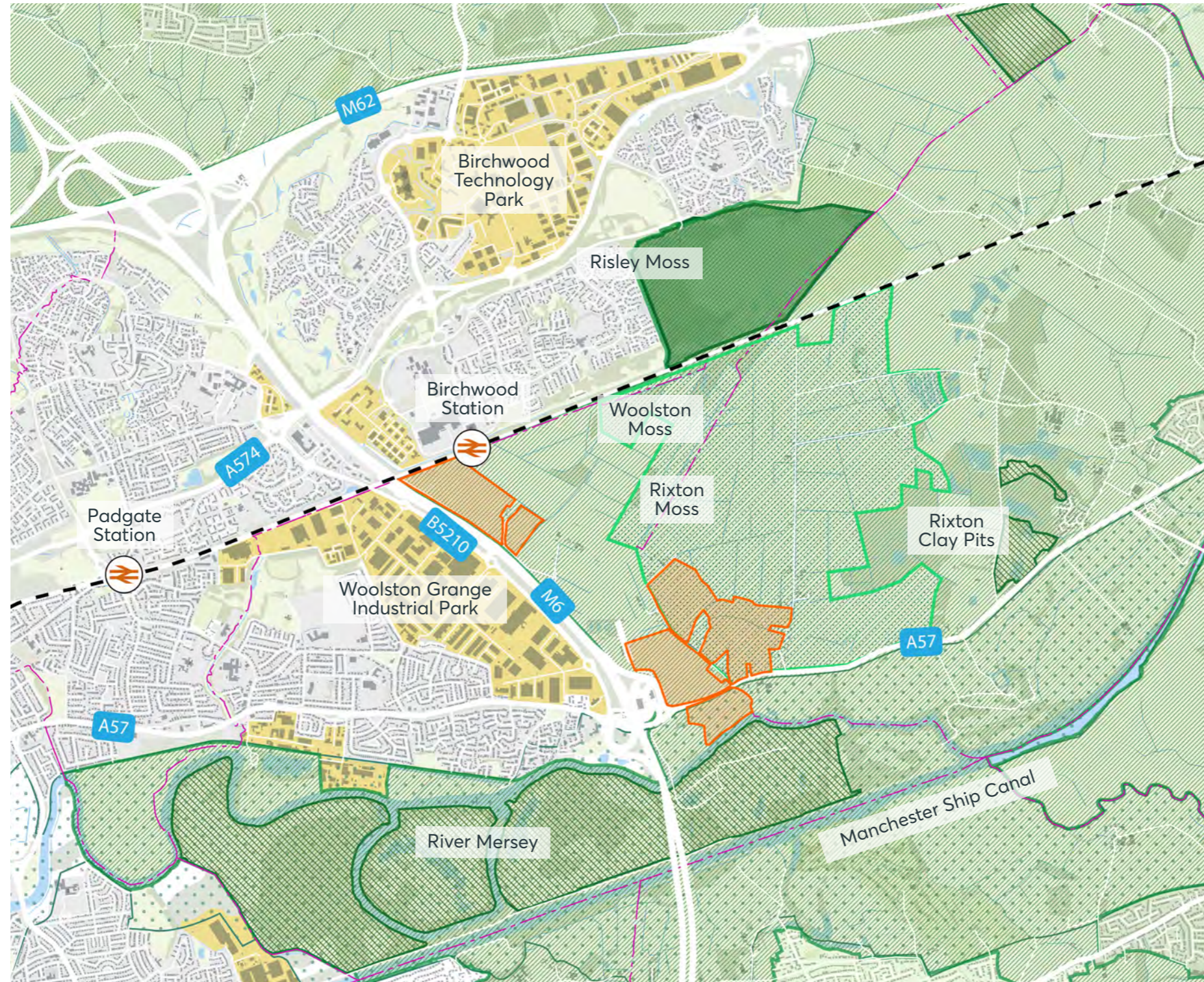


THE SITE IN QUESTION IS **SHOWN OPPOSITE.**



5. SITE DESCRIPTION INCLUDING CONSTRAINTS

-  Indicative Site Boundary
-  Employment / Industrial Area
-  Open Space
-  Woodland
-  Green Belt
-  SSSI
-  Local Nature Reserve
-  LP CS6 Strategic Green Link
-  Local Wildlife Site
-  Surface Water
-  Railway Line
-  Road
-  Ward Boundary



THE SITE IS LOCATED IN RIXTON, WARRINGTON AND COMPRISES AROUND 71.5 HA OF LAND.

SITE LOCATION

The site is at a strategic location off Junction 21 of the M6. J21 is nodal point providing access into the western and central areas of Warrington to the west of the site via the arterial A57 Manchester Road route. The junction provides direct access to the M6 strategic round network and the conurbations located north and south along that route including Cheshire to the south and Wigan and Preston to the north.

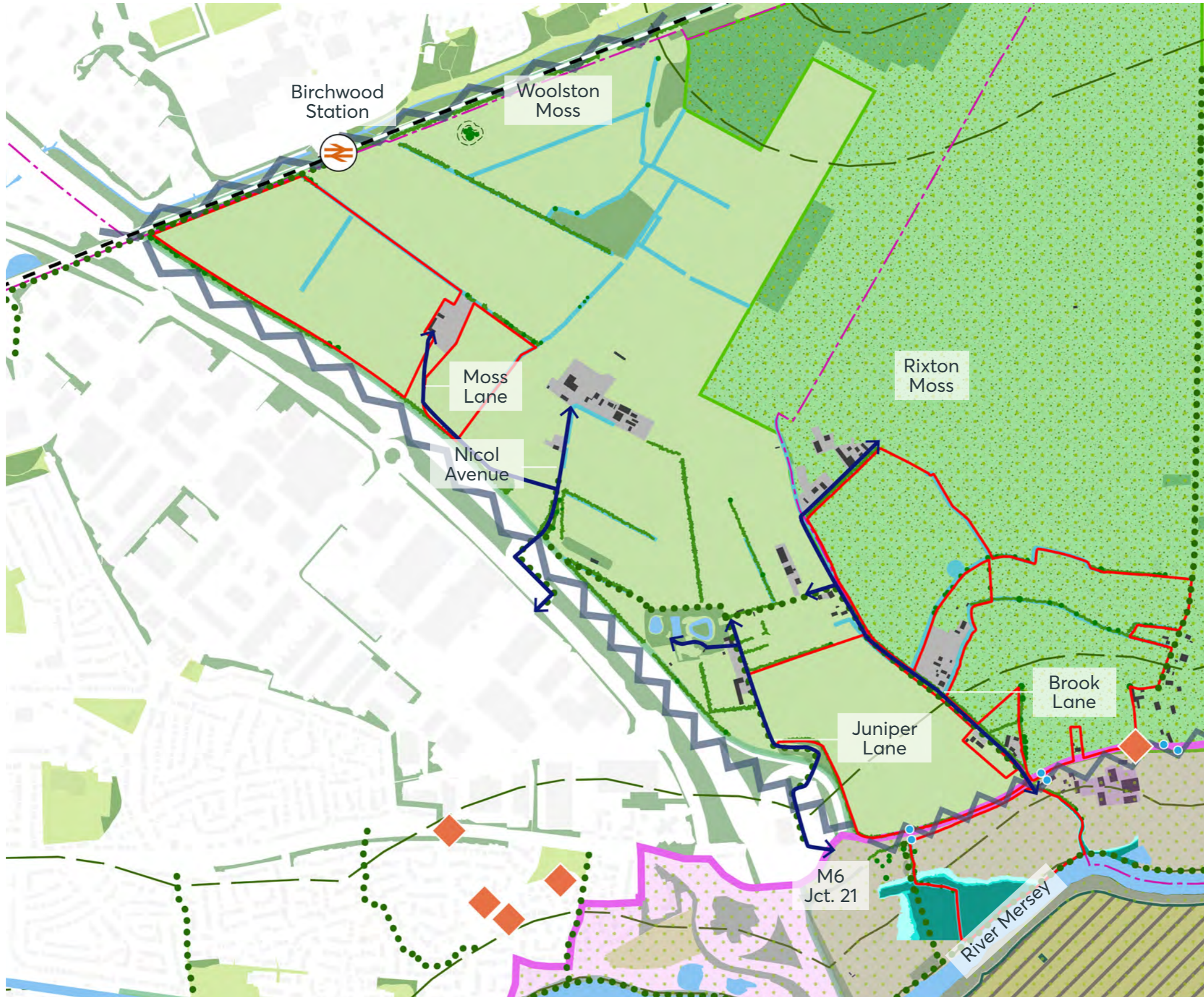
Junction 21 is also located equidistant between the M56 to the south and the M62 to the north that provides access to further conurbations in the surrounding north west area including Manchester, Salford, Liverpool, Chester and St. Helens.

SITE DESCRIPTION

The site comprises six parcels of land. The main 'development' areas of the site are the four parcels of land located either side of Manchester Road, with two parcels of land located at the point where the M6 crosses the railway line. If required, the latter parcels of land are intended for ecological mitigation as described in Section 10.

With the above in mind, the M6 motorway runs along the western boundary of the site, with Junction 21 of the motorway leading to the A57, Manchester Road, which dissects the site. The River Mersey forms the southern extent of the site. To the east, the site is bordered by open farmland and countryside.

- Indicative Site Boundary
- Green Belt
- Rixton Moss (Local Wildlife Site)
- LP CS6 Strategic Green Link
- SSSI
- SSSI 500m Offset
- Tree Belt/Hedgerow
- Tree
- Tree Offset
- Woodland
- Open Space
- Surface Water
- Ditch and 5m offset
- Flood Risk 1 - 100 year
- Flood Risk 1 - 200 year
- Flood Risk 1 - 1000 year
- Listed Building / Feature
- Existing Vehicular Access
- Barrier to Movement
- PRoW
- Railway Line
- Bus Stop
- Ward Boundary



SITE AND SURROUNDING FEATURES

The site area currently comprises open land. The land is predominantly flat, and drains to the south towards the River Mersey. There are a limited number of trees on the site. The site is located approximately 1.2km south of Manchester Mosses Special Area of Conservation (SAC) and Risley Moss Site of Special Scientific Interest (SSSI), 1.3km west of Rixton Clay Pits SAC / SSSI and 75m north of Woolston Eyes SSSI.

Further north of the site, across the railway line, is the established settlement of Birchwood, comprising 4 main areas: Birchwood Shopping Centre which is the closest to the site and the train station, and three distinct residential communities – Locking Stumps, Oakwood and Gorse Covert. Further to the north is Birchwood Technology Park, adjacent to the M62.

6. THE PROPOSAL

THE PROPOSAL IS FOR THE REMOVAL OF THE SITE FROM THE GREEN BELT AND ITS ALLOCATION FOR STRATEGIC EMPLOYMENT DEVELOPMENT THAT WILL MEET LARGE-SCALE INDUSTRIAL AND LOGISTICS NEEDS, PRINCIPALLY IN USE CLASSES B2 AND B8.

A FRAMEWORK MASTERPLAN FOR THE PROPOSAL IS OPPOSITE.

The Framework Masterplan shows the employment land use parcels that can be located at the site to the north and south of Manchester Road (A57). The total site measures approximately 71.5 hectares with the developable area for employment development being approximately 40 ha. This area could deliver a total of almost approximately 115,000 sq. m of based on a development site coverage of approximately 30%. The Land Use Budget Schedule outlining the developable plots and quanta of developable area is included at Appendix C.


The site can be accessed from Manchester Road via two access points. The first access point to the east of Junction 21 comprises a 4-arm roundabout to serve the development land west of Brook Lane. This would access Parcels 1.1, 1.2 and 4 to the north and south of Manchester Road as shown on the Framework Masterplan.

To the east of Brook Lane a ghost island priority junction would serve Parcels 2.1, 2.2, 2.3 and 3 that are all located to the north of Manchester Road.

A proposed development could therefore be served by all necessary highways infrastructure as discussed in further detail in Section 9.

The proposal also includes two parcels of land to the north west of the development site at the point at which the M6 crosses the railway line. This land is dedicated to the re-provision and enhancement of existing green infrastructure if required. This area of land measures approximately 20 ha and would be used for any ecological mitigation and biodiversity enhancement that may be required as a consequence of the development of the site.

Existing green and blue infrastructure (trees, hedges, ditches etc) will be retained as far as possible, particularly to the perimeter of the site, utilising existing features to the benefit of the new development. Landscape and acoustic buffers will be created between proposed uses and adjacent properties, as well as to the open land to the east.

-  Indicative Site Boundary
-  Employment Development
-  Proposed Access
-  Existing Major Road Network



7. THE CASE FOR THE ALLOCATION WARRINGTON'S ECONOMIC DEVELOPMENT NEEDS

INTRODUCTION AND SUMMARY

This section assesses whether there is a need for the proposed development that justifies the case for the removal of the site from the Green Belt and the allocation for the site for Industrial and Logistics ('I&L') development.

Detailed technical analysis that assesses economic development needs in Warrington is included in the Industrial & Logistics Needs Assessment prepared by Savills (UK) Limited that is included at Appendix D.

The Assessment demonstrates there is a significant shortfall in provision for I&L development in the emerging Local Plan.

The Assessment provides an evidence-based overview of the potential for new ('I&L') development at the site, having regard to current and future market supply and demand dynamics in Warrington and the wider Functional Economic Market Area ('FEMA').

The Assessment findings demonstrate that Warrington's future I&L land needs far exceed its existing and planned employment land supply in the emerging Local Plan, with **a shortfall totalling 195.49 ha over the plan period to 2038.**

Further, having reviewed the information included with the employment allocation at Fiddler's Ferry, the Assessment demonstrates that only approximately half of the employment allocation at Fiddler's Ferry is likely to be delivered within the plan-period up to 2038. Accordingly, this increases the **shortfall to 246.49 ha over the plan period.**



ASSESSMENT

Industrial & Logistics Requirements in Warrington

In order to assess the required demand for I&L development, Savills assess the ENDA Refresh and identify a number of deficiencies in the way future needs have been assessed, namely:

- The Look-back Period is Too Long:** the look-back period over which average take-up (demand) is calculated runs for 24 years from 1996 to 2020. This is far too long a period over which the demand drivers underpinning I&L need, and the characteristics of the sector itself, have changed significantly. For example, the last decade has seen a significant increase in online shopping from 2.8% in 2006 to 19.1% in February to 2020. The Covid-19 pandemic has accelerated this trend further with online shopping currently sitting at 25.9% of all retail sales (September 2021). Growth in online retailing has a direct impact on I&L demand as going online requires 3 times the amount of warehouse floorspace compared to traditional bricks & mortar shops. Such a long look-back period also dampens the impact of other, more recent, growth drivers for I&L demand such as increasing UK freight volumes, UK companies bringing their operations back to the UK to avoid Brexit related supply chain shocks and continued business and housing growth in Warrington and the wider FEMA. Finally the inclusion of the Global Financial Crisis ('GFC') in the 24 year look back period also undercuts historic demand as this resulted in a systematic impact to the entire UK economy. In the years immediately following the GFC, I&L demand in Warrington was negative (-91,411 sq. ft net absorption per annum) vs 638,000 sq. ft of net absorption per annum since 2012.
- The EDNA uses Completions rather than Net Absorption:** the EDNA's measure of take-up is based on completion trends rather than actual take-up of floorspace (what Savills refer to as net absorption). Development completions are a supply measure, not a demand measure. For new development (completions) to come forward new employment sites need to be allocated, and planning permission granted before new floorspace can be built. The length of time and complexities involved is why supply measures (completions) typically lag actual demand (net absorption). Therefore the use of a lagging supply factor, and projecting this forward into the future, results in an underestimate of true need based on actual market demand.
- The EDNA doesn't account for suppressed demand:** when supply, as signalled by floorspace availability, is low, demand is suppressed as prospective tenants can't find space in a market. By merely projecting forward historic take-up, the EDNA has taken no account of demand that has been lost due to supply constraints and therefore presents a need profile based on a supply constrained trend (or 'suppressed demand'). Since 2015, I&L availability has been a downward trajectory and has now dropped below the 9% equilibrium rate for Warrington that is considered to indicate a balance between supply and demand. The rest of the FEMA has been below the 9% equilibrium rate since 2014 demonstrating, as a whole, the entire FEMA has been supply constrained for much of the last decade.

The Savills methodology for estimating future demand is therefore more realistic than the EDNA as it attempts to understand true demand rather than project forward historic trends that have been suppressed by historic supply constraints.

In terms of future I&L demand, it is estimated that there is a need of 15.97m sq. ft over the 18-year Plan period. This estimate is derived by projecting forward historic take-up over the plan period (9.53 million sq. ft), accounting for suppressed demand in years where the market was supply constrained (420,293 sq. ft), adjusting for current and future increases in online retail (3.25m sq. ft), adding a 3-year buffer to provide a continuum of supply beyond the end of the plan period and to account for the current day I&L growth drivers (2.2m sq. ft), and allowing for business displacement associated with Warrington Masterplan projects (570,000 sq. ft).

At a 30% plot ratio the 15.97m sq. ft of floorspace need equates to **495.62 ha** of land. This is considerably higher than the future I&L demand estimated by the EDNA (2021) at **242.26 ha**.

Current I&L supply totals 299.13 ha. This is made up of proposed new employment allocations, existing land supply and land within the Borough of St. Helens secured to count towards Warrington's land supply via Duty to Co-operate. Subtracting the Supply from Future Demand, there is a **shortfall totalling 195.49 ha over the plan period**.

Further, a significant level of the floorspace demand is forecast to be delivered at the Fiddler's Ferry power station site (101 ha). The owner of the Fiddler's Ferry site considers that employment development will be delivered by 2030. This is incredibly optimistic. Therefore, and having reviewed the information included with the employment allocation at Fiddler's Ferry and comparable employment developments that have been delivered on former power station sites, the Assessment demonstrates that a more realistic assessment is that only approximately half of the employment allocation at Fiddlers Ferry is likely to be delivered within the plan-period up to 2038. Accordingly, this increases the **shortfall to 246.49 ha over the plan period**.

Even setting aside the consideration in relation to Fiddler's Ferry, which we do not consider the Local Planning Authority can given it would not be robust to consider that all of the employment development at Fiddler's Ferry will come forward in the plan-period, there remains a substantial shortfall in land allocated for I&L development in the emerging Local Plan.

The overwhelming case for additional land for I&L development justifies the allocation of the site for such purposes. The location and deliverability of the site meets known planning criteria for the allocation of the site to support the Local Planning Authority in meeting identified needs for I&L development. It has a number of advantages over other sites that could be considered.

Advantages of developing the site, including:

- The site is large (40.25 ha) enough to accommodate a variety of unit sizes and benefit from supply chain linkages and other agglomeration benefits such as knowledge spill overs between firms, sharing the costs of estate wide maintenance and security for instance.
- The site is level which is a key requirement for I&L developers.
- The site is likely to benefit from 24-hour access due it not being nearby to sensitive uses. This has become a key operation requirement for I&L occupiers.
- The site is a prime I&L location on the M6 with limited infrastructure requirements given it benefits from direct access to Junction 21 of the M6 via Manchester Road (A57).
- The site is within a 2-hour drive time, the Subject Site can access a third of England and Wales' resident and business population.
- The site benefits from high levels of workforce accessibility, with the ability to reach 1.1 million people of working age within a 24-minute drive time.
- The site is also conveniently located with respect to key freight handling infrastructure including ports, freight handling airports and Strategic Rail Freight Interchanges (SRFI) within a 2-hour drive time.
- The site is under single ownership which St Modwen has a development agreement in place for.

The allocation of the site for employment purposes is therefore fully justified.



Economic Benefits & Social Value

The Assessment at Appendix D also provides details of the economic benefits and social value created by the proposed development. The forecasts are summarised as follows:

- **1,457 operational jobs** will be created for the residents of Warrington at the employment development
- **171 construction jobs** will be per annum over a seven year construction period
- **£97.1m gross value** added ('GVA') is expected to be generated per annum from on-site employment
- **£53.2m of private income** is anticipated to be generated per annum for on-site workers
- **£1.2m of estimated business rates** for Warrington is expected to be generated by the proposed development
- **The total social value of the proposed development is £31m** based on apprenticeship schemes, NHS savings through a reduction in unemployment and through supporting local businesses

It follows that the economic benefits and social value created by the development is significant and a material factor in supporting the allocation of the site for employment development.

CONCLUSION

There is a substantial forecast demand for I&L development over the plan-period. The level of demand forecast and evidence in the Industrial & Logistics Needs Assessment prepared by Savills (UK) Limited is significant. The Local Planning Authority's evidence base has wrongly identified the level of need required. It is estimated that there could be a shortfall in provision in the emerging Local Plan of up to approximately 250 ha.

Accordingly, there is an evidential basis to support the removal of the site from the Green Belt and its allocation for employment development. The need identified is significant and the site meets known criteria for sound land-use planning to be allocated to support meeting that need.

8. THE CASE FOR THE RELEASE OF GREEN BELT LAND

INTRODUCTION

THIS SECTION ASSESSES THE CASE FOR THE RELEASE OF THE SITE FROM THE GREEN BELT TO MEET IDENTIFIED EMPLOYMENT NEEDS.

ASSESSMENT

Paragraph 140 of the NPPF confirms that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

It is already well-established that Warrington is altering its Green Belt boundaries to meet its residential and employment development needs.

In employment land terms, the principal strategic employment development allocation in the emerging Local Plan is currently located wholly in the Green Belt (South East Warrington Employment Area).

Further, aside from the employment component of Fiddler's Ferry, all of the land supply options considered for employment development as part of the emerging Local Plan are located within the Green Belt¹.

Section 7 demonstrates that Warrington's future I&L land needs far exceed its existing and planned employment land supply in the emerging Local Plan, with a shortfall totalling up to approximately 250ha. There is therefore a critical requirement to allocate additional land for employment development.

Paragraph 141 sets out three considerations that need to be taken into account in a strategy when considering amendments to the Green Belt to meet identified needs. The strategy considerations along with our comments on each are as follows:

- **That the Local Plan makes as much use as possible of suitable brownfield sites and underutilised land** – The emerging Local Plan allocated 101ha of brownfield land at Fiddler's Ferry to meet employment needs. All other sites assessed in the EDNA are located in the Green Belt. Given the under provision of land to meet employment needs, the only option is to consider land for release that is located within the Green Belt.
- **The Local Plan optimises the density of development in line with the policies in Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport** – there are no suitable sites within the town centre to meet strategic I&L development needs.
- **The Local Plan has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development** – Green Belt land in St. Helens is proposed to be released as part of the emerging Local Plan to meet Warrington's Green Belt needs. A neighbouring authority is already making a meaningful contribution to employment development needs in Warrington.

Given that there is a significant requirement to meet additional employment land needs there are fully evidenced and justified exceptional circumstances to change the Green Belt boundary.

Given the only option is to consider Green Belt land, it follows that it is appropriate to remove the site from the Green Belt and allocate it for employment needs. The site is a prime I&L location on the M6 with limited infrastructure requirements given it benefits from direct access to Junction 21 of the M6 via Manchester Road (A57) as demonstrated in the Industrial & Logistics Needs Assessment included at Appendix D.

At approximately 40ha, the site will make a meaningful contribution to meeting Warrington's employment land needs. Section 7 demonstrates the advantages that the site has in terms of the delivery of employment land required to meet Warrington's need and the site is graded as A+ / B+ for employment development if potential constraints can be overcome. The following sections assess the constraints and demonstrate that there are no constraints that would prevent the site from meeting employment needs.

Paragraph 143(e) of the NPPF confirms that plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan-period. Given the substantial objectively assessed need for additional employment development, the Council is required to act on that need and amend the boundary now in accordance with the requirements of Paragraph 143(e). To wait for a future plan review, would undermine the policy approach that Green Belt boundaries should likely be permanent.

It follows that in order for the Plan to be found sound, there is a clear requirement for the site to be allocated for employment development. The objectively assessed need requires the Council to reassess its Green Belt boundary in order to meet that need. As the Council has not done so, the emerging Local Plan cannot be considered to be justified.

The site's allocation would therefore be justified to meet the substantial need for additional employment land allocations in the emerging Local Plan and there are no constraints to its delivery.



1. Table 46 of the EDNA

9. HIGHWAY CONSIDERATIONS

LAND ADJACENT TO M6 J21: LOCAL PLAN REP (SWECO SUMMARY)

Introduction

A Traffic and Access Appraisal examining the opportunities for the development of land to the east of the M6 J21 for industrial and logistics land-uses has been undertaken. Discussions have been initiated with Warrington Borough Council ('WBC') and National Highways ('NH') regarding the key transport planning principles to be addressed within a future Transport Assessment. Agreement has been reached with both parties to enable a preliminary assessment to be undertaken examining access opportunities from the A57.



A57 Manchester Road

The land for development is located to the east of the M6 J21 and comprises areas to the north and south of the A57 Manchester Road. The land to the north is bisected by Brook Lane. There are no active points of access onto the A57.

The A57 is a single carriageway road with a typical width of 7.3m from its junction with M6 J21 eastwards where it forms the boundaries of the site areas to the north and south of Manchester Road. It is street lit and subject to a 50mph speed limit. There are no Traffic Regulation Orders (TROs) in force. Footway provision is intermittent and of a variable quality and width.



Accessibility

The areas to the west of the M6 and the north of the railway line are highly urbanised with a dense development pattern. In contrast, the development land and the adjacent areas east of the motorway are largely undeveloped. As such, there is currently limited pedestrian, cycle and public transport infrastructure adjacent to the A57 and within the site. This is not entirely unexpected given the minimal historical pedestrian demand and therefore need for supporting infrastructure.

The development of the site will facilitate the provision of significantly improved facilities and infrastructure for sustainable transport modes, both within the site and on the A57 frontage, providing opportunities to establish links into the adjacent areas and the existing PRoW network which would benefit all users.



Road Safety

Personal Injury Accident data for the period 2016 – 20 (incl) have been examined for the section of the A57 passing the development site. There are no clusters of accidents on the A57 and the overall number in the five year period examined (11 in total – 8 slight and 3 serious) does not suggest a historical road safety issue. There were no fatal accidents, only one accident involving a cyclist and no accidents involving pedestrians, or HGVs.



Traffic & Access Appraisal

Trip rates, traffic generation and trip distribution for LGVs (staff traffic) and HGVs have been agreed with WBC / NH and applied to 2037 base traffic flows to produce a 2037 'with development' scenario, against which the operation of the A57 / site access junctions and the impact of the proposed development can be evaluated.

To derive an estimate of multi-modal trips, mode split data has been sourced from the 2011 Census. This reveals that the public transport, walking and cycling mode share in the area is currently low, suggesting that the development could act as a catalyst for improving the existing bus, pedestrian and cycle infrastructure on the A57 frontage and within the site, with connections provided to the wider footpath / PRoW and cycle networks. The vehicle mode share is currently high, however this is not unexpected given the close proximity to the M6 and wider motorway network and the current limited public transport, walking and cycling provision.

The development will provide an excellent opportunity to improve the existing bus, pedestrian and cycle infrastructure and to promote sustainable transport to future occupiers through a robust Travel Plan.



Access Strategy

An access strategy option from the A57 has been identified and tested using modelling software TRANSYT 15. This comprises a 4-arm roundabout serving the development land west of Brook Lane (north and south of the A57) and a ghost island priority junction serving the land east of Brook Lane. Access between the west and east land parcels to the north of the A57 will be provided via a new link crossing Brook Lane. Appropriate emergency services and PT access would also be provided.



Assessment Summary

The results of the preliminary operational assessment indicates that the access strategy is appropriate to provide access to the development site from the A57 for the anticipated land-uses and quantum of development proposed. There is therefore a deliverable access strategy which accords with the requirements for acceptability on highway grounds set-out in the NPPF.

10. ECOLOGICAL AND ENVIRONMENTAL CONSIDERATIONS

INTRODUCTION

SK ENVIRONMENTAL SOLUTIONS LIMITED HAS BEEN COMMISSIONED BY ST MODWEN DEVELOPMENTS LIMITED TO ASSESS LAND, TO THE SOUTH OF BIRCHWOOD STATION.

This section considers the likely potential ecological and environmental considerations for any future development.

DEFINITION OF TERMS

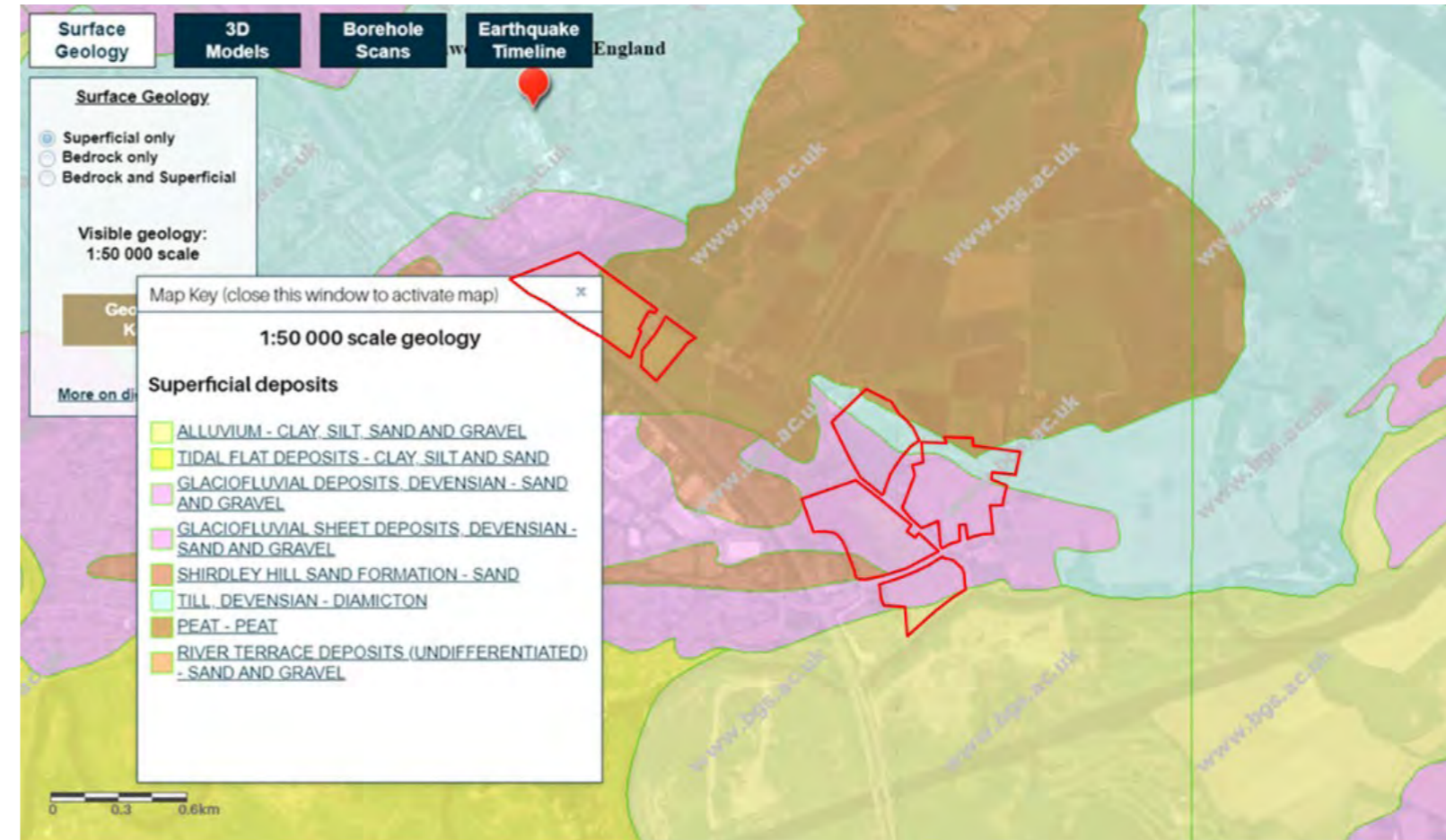
The term 'site' is used to refer to the six parcels of land denoted by the red line boundary on the image below.

The site is primarily agricultural in nature and during the walkover survey undertaken in March 2021, the majority of the site comprised winter cereal crops, or oil seed rape.

The site is located approximately 1.2km south of Manchester Mosses Special Area of Conservation (SAC) and Risley Moss Site of Special Scientific Interest (SSSI), 1.3km west of Rixton Clay Pits SAC / SSSI and 75m north of Woolston Eyes SSSI and the closest points.



Red Line Boundary



Peat and Sand and Gravel Plan

The Discretionary Advice Service ('DAS') provided by Natural England has been used to get impartial commentary from Natural England on the potential constraints to development for the site. Natural England's comments have been summarised below:

PEAT CONSIDERATIONS

Natural England state that 'There is an extensive area of peat across the proposal site, especially to the north and middle of the submitted location plan'. However, when provided with a copy of the information used by Natural England it is quite clear that the site is not located over deep peat, but a mixture of sand and gravel (see plan above).

In addition, we understand that other parties who have looked at land to the north of the site have undertaken ground investigation works across their site and have observed that the peat layer does not stretch as far south as indicated on the plan above.

It follows that as only a very small amount (if any) of the site is located over peat, there should be no requirement for mitigation.

HABITAT REGULATIONS ASSESSMENT

Natural England also state that as the site is close to (approximately 1.2km south at its closest point) to Manchester Mosses SAC, that a Habitat Regulations Assessment would be required to assess the implications for changes in hydrological regimes and air quality in relation to the degraded raised bog.

As part of any potential future formal planning application, St Modwen will look at the hydrological connectivity of the two areas (if any) and assess the potential impacts of any proposed development upon the Manchester Mosses SAC and Rixton Clay Pits SAC, approximately 1.4 km to the west.

However, at this stage and given the distances to those areas, it is considered unlikely that any proposal in this location of a commercial nature will have any impact upon the two SAC's in relation to either hydrology or air quality.

ECOLOGICAL CONSIDERATIONS

Breeding and Wintering Birds

The site is located within 70m of Woolston Eyes SSSI and within 1.2km of Risley Moss SSSI, both of which are designated for the breeding / wintering bird assemblages.

It is considered that habitats within the site, primarily agricultural / pastoral land are fairly ubiquitous in the area and the likelihood of them being used by significant amount of notified species (for the SSSI's) is unlikely. However, St Modwen have commissioned a suite of wintering (October – March) and breeding bird (March – August) surveys. The results of these surveys will be used to inform any mitigation considered necessary, if any.

Local Sites / Priority Habitats / Species

The northerly two fields of the site are located within Rixton Moss Local Wildlife Site ('LWS'). The overall LWS covers an area of 278ha, with 28ha located within the site (i.e. approximately 10%). The LWS is designated for the following:

- **Birds** – corn bunting *Emberiza calandra* (which is a Cheshire Biodiversity Action Plan species) and yellow wagtail *Motacilla flava*; and
- **Invertebrates** – black darter dragonfly *Sympetrum danae*

Any future development at the site would result in the removal of approximately 28ha of the LWS. However, St Modwen own another parcel of land close to the site which is to be used for mitigation for the loss of the LWS area. The parcel of land, located to the northwest of the site (see Red line plan on previous page) is approximately 20ha in size and currently comprises agricultural grassland, hedgerows and a wet ditch.

This area could be enhanced to provide improved habitat for the target species for the LWS as well as being enhanced for other notable species. It is considered that this will be sufficient to offset the loss of the comparable area of land from LWS and any further mitigation as may be required, including achieving a at least a 10% biodiversity net gain from the baseline for the site.

Other Protected Species

Great Crested Newts *Triturus cristatus*

The site is surrounded by a network of wet ditches and a small number of ponds, mainly ornamental ponds, associated with dwellings. Given the proximity of the site Rixton Clay Pits SAC / SSSI, which supports one of the largest populations of great crested newts (GCN) in the UK, the possibility of GCN being present cannot be ruled out. However, no evidence of GCN presence has been recorded to date in this area and if presence was detected Natural England have confirmed that through the utilisation of the District Level Licensing scheme which is place in the area, that a financial contribution through the DLL would remove the constraint of GCN. As such GCN would not be considered to be a constraint to the proposed development of the site.

Water Vole *Arvicola terrestris*

The network of ditches have the potential to support water vole *Arvicola terrestris*. Future survey work will be undertaken. If the species is present the site itself has only one ditch, and the surrounding area and the potential mitigation site contain ditches that could be planted and improved to encourage water vole in the area resulting in a net benefit to any water vole populations. As such, water vole are not considered to be a constraint to any proposed development of the site.

CONCLUSION

It is considered, that given the information provided above, any proposed development scheme brought forward for the site would be deliverable, through the use of appropriate mitigation measures where required, without having a deleterious impact upon the ecological receptors present.

Habitat creation/improvement within the proposed mitigation area, would offset the removal of a small section of the LWS. Liaison between the developer and local wildlife groups would ensure that appropriate levels of mitigation / compensation will be delivered to secure the long-term favourable conservation status of the key species for which the LWS is designated, whilst contributing to the nature conservation targets for the local area.

It is considered that the comments raised by Natural England will be addressed through appropriate surveys, alongside detailed and well considered mitigation design, which will be supported throughout by regular communication with stakeholders. Future development in the area will maximise the biodiversity potential of the site, with nature conservation being a paramount consideration at all stages of any proposal.

11. FLOODING AND DRAINAGE CONSIDERATIONS

INTRODUCTION

A TECHNICAL NOTE PREPARED BY HDR | BRADBROOK CONSULTING IS INCLUDED AT APPENDIX A THAT CONSIDERS FLOODING AND DRAINAGE MATTERS.

FLOODING CONSIDERATIONS

The technical note confirms that flooding matters are a straightforward consideration. The significant majority of the site is located within Flood Zone 1. This is an update from earlier consultations on the emerging Local Plan where the site had been considered to be in Flood Zone 3. Detailed site level information and technical modelling analysis was provided to the Environment Agency in early 2021, which resulted in the declassification of the site from Flood Zone 3 to principally being located within Flood Zone 1 and an updating of the Environment Agency's 'Flood Map for Planning' as can be seen from Figure 1 of the appended technical note. A small section of the site towards the south where the site abuts the River Mersey remains in Flood Zone 2. However, as can be seen from the Framework Masterplan included at section 6, no development is currently proposed in this area.

In addition to the above, Figure 2 provided with the technical note at Appendix A confirms that the site is at a low risk of surface water flooding.

It follows that there are no flood risk matters that would prevent the development of the site.

DRAINAGE CONSIDERATIONS

The site presents the opportunity to deliver sustainable urban drainage solutions to ensure the future betterment of the development. Detailed drainage would form part of a detailed future planning application, but St. Modwen will consider the inclusion of sustainable drainage design and any attenuation required at an early stage in the process to ensure the site is delivered with drainage betterment in mind.

Two plans are included at Appendices E and F as follows:

- 1. Contour plan** – based on LIDAR information, containing contours and gradient information.
- 2. Outline Drainage Strategy** – this calculates storage requirements and utilises OS mapping to identify indicative outfall locations. A Greenfield Qbar rate has been estimated at 2.2l/s/ha which has allowed for discharge rates for each parcel to be calculated, see table below. The storage volumes provide storage up to and including the 1 in 100 year plus 40% climate change allowance.

Infiltration may be suitable for the site, and this can be confirmed later by intrusive onsite tests in line with BRE365. The overall strategy can be, but not limited to, a mix of above ground attenuation pond, swales, and lined permeable paving. The site's drainage strategy will look to provide a sustainable solution that enhances amenity and water quality where possible, whilst ensuring that the hydrology of the site is the same as pre-development conditions or better. Should the site layout have spatial constraints, tanks and/or geocellular storage tanks can be used but only as part of the wider SUDS strategy, rather than instead of.

An outline drainage strategy has therefore been formulated which takes account of the existing site topography, gradients and subcatchments. Storm water outfalls have been tentatively identified and utilise the existing south flowing drainage network which ultimately outfalls to the River Mersey. A sustainable approach to drainage will be taken which seeks to reduce the effects of the development on the surrounding drainage network to ensure no increase in flood risk. Based on the outline masterplan a water storage strategy has been adopted which provides resilience up to the 1 in 100 year event with an additional 40% climate change allowance. Water attenuation will be provided by a mix of open storage ponds which can be co-located to enhance the landscape and

bio-diversity aspects of the scheme. A proportion of the storage can also be provided as tanks or geo-cellular storage. The geology of the site also provides further opportunities for the sustainable management of stormwater by enhancing infiltration into the underlying Glacial Sands and Gravels. The current attenuation volumes calculated is provided in the table below. The plan attached at Appendix F provides an individual catchment analysis and a plausible locations for the attenuation feature and outfall.

It follows that there are opportunities to ensure the development is delivered with appropriate drainage.

| Catchment | Parcel(s) | Area (ha) | Limiting Discharge Rate (l/s) | Attenuation Volume (m ³) |
|-----------|-----------------|-----------|-------------------------------|--------------------------------------|
| A | 1.1, 1.2 | 11.13 | 24.4 | 9,600 |
| B | 2.1, 2.2a, 2.3a | 10.68 | 23.4 | 9,200 |
| C | 2.2b, 2.3b | 3.39 | 7.4 | 2,900 |
| D | 3 | 9.93 | 21.8 | 8,500 |
| E | 12 | 4.50 | 9.9 | 3,900 |

12. TECHNICAL ENGINEERING CONSIDERATIONS

CONSIDERATION

The natural geology of the site has been assessed by reference to the British Geological Survey on-line viewer.

The site has a covering of superficial soils overlying the regional bedrock strata.

Superficial deposits comprise:

- **Recent Alluvium.** Typically soft or loose silts, sands and gravels often with organic bands. These are located within the southern part of the plot adjacent the River Mersey overlying Glacial Sand and Gravel.
- **Peat/Organic Soil.** Typically soft organic rich compressible deposits. These are shown to be located on the northern margins of the site directly overlying the Glacial Till. The location of Peat is discussed in Section 10 and confirmed that as only a very small amount (if any) of the site is located over peat, there should be no requirement for mitigation
- **Glacial Sand and Gravels.** Shown to be underlying the majority of the site at the surface.
- **Glacial Till.** Typically firm to stiff clays and silts with sand and gravel bands. The Till is likely to underlie all other superficial deposits and overlie the bedrock. Till is shown to be at the surface towards the north west of the site.

Bedrock Strata Comprises:

- **Triassic Wilmslow Sandstone Formation.** This deposit underlies the whole site beneath the superficial deposits.

A selection of publicly held boreholes to the west of the site confirms the near surface geology as comprising sand, gravel and clays which is broadly as indicated by the published geology. The depth to the various strata is not indicated although it is expected that the depths to the upper surface of the bedrock is likely deepen towards the south and the margins of the River Mersey.

GROUNDWATER

The bedrock strata is classified a sensitive Principal Aquifer. Overlying superficial strata is likely exhibit varying sensitivities and classified as variable Secondary Aquifers.

LAND USE INFLUENCES

The site is predominantly agricultural in nature with farmsteads and scattered residential properties. The land use appears to comprise predominantly arable farming. Public database searches indicate the absence of historic landfills within the site boundary.

GENERAL CONCLUSIONS

A preliminary assessment of ground and groundwater would indicate that overall site development is unlikely to be significantly compromised by its natural geology. Similarly the observed land use history is one which is unlikely to have led to significant land disturbance or ground contamination to an extent which would significantly affect any proposed development or the wider environment.

Ground aspects and risks to be explored in the later design process include:

- Localised presence of contamination associated with site activities and the need for localised waste management or remediation
- Depth of ground water and the impacts on the use of soakaways
- Competence of the glacial Sand and Gravel and Glacial Till for utilisation in foundations. Both these strata offer plausible shallow pad options although the weathering profile will need to be confirmed. Underlying sandstone bedrock provides alternative founding strata for piled structures although the depth will require confirmation through additional ground investigation.



13. THE PLANNING CASE FOR THE ALLOCATION OF THE SITE AND THE PROPOSED ALLOCATION

THE PLANNING CASE FOR THE ALLOCATION

The preceding sections of the Promotion Document demonstrate the two key requirements that support the allocation of the site, namely that:

1. The allocation of the site would meet an identified need for employment development; and
2. The development of the site is deliverable.

There is a clear objectively assessed need for need for I&L development land in Warrington. The current emerging Local Plan does not meet its objectively assessed need for employment development as demonstrated in the Industrial & Logistics Needs Assessment. It follows that the Plan cannot currently be considered 'sound' as it does not meet the tests included at Paragraph 35 of the National Planning Policy Framework. The emerging Local Plan is not:

1. Positively prepared as it does not provide a strategy that meets Warrington's objectively assessed needs.
2. Justified as it is not based on proportionate evidence. The proportionate evidence demonstrates that there is a significant requirement for additional land for employment development to meet the area's needs.
3. Effective as a more realistic assessment is that only approximately half of the employment allocation at Fiddlers Ferry will likely be delivered within the plan-period up to 2038. This will increase the objectively assessed need for employment development over the Plan-period.
4. Consistent with national policy as the Plan does not place 'significant weight' on the need to support economic growth and productivity as required by Paragraph 81 of the National Planning Policy Framework.

It follows that in order for the Plan to be found sound, there is a clear requirement for the Council to re-assess its Green Belt boundaries and to allocate the site for employment development in order to assist in meeting objectively assessed needs. As the Council has not assessed its Green Belt boundaries in the light of that correctly identified need, the emerging Local Plan is not justified.

It is already well-established that Warrington is altering its Green Belt boundaries to meet its residential and employment development needs as it does not have brownfield land that can meet those needs.

As demonstrated in Section 8, aside from the employment component of Fiddler's Ferry, all of the land supply options considered for employment development as part of the emerging Local Plan are located within the Green Belt¹, including the principal allocation at South East Warrington.

There are therefore no non-Green Belt sites that can meet the identified need for additional employment development. Further amendments to the Green Belt boundary will therefore be required.

The level of need required and the deliverability of the site to make a meaningful contribution to that need meet the requirement for exceptional circumstances to allocate the site for employment development.

Table 46 of the EDNA assesses the Land Supply Options including the site, which is considered as 'Option 6'.

The consideration text confirms that the employment land is at a highly accessible location on the A57, with immediate access to J21, M6 and that the Birchwood area, which includes the site is a desirable and well established location for meeting both local and strategic employment needs. Further, the text at Table 46 confirms that the site links well to established employment clusters.

However, Table 46 considers that:

1. The site make-up poses challenges to delivering a single, coherent development
2. Some, but not all of the land is under the control of an experienced developer
3. There are questions over the road infrastructure required to support the development of the site

The EDNA considered a wider parcel of land that is put forward by the Promotion Document. As demonstrated in the preceding sections:

1. A single, coherent development can be delivered as evidenced by the Masterplan and proposal information included in Section 6 and the access strategy included in Section 9.
2. All of the land required to deliver the employment development proposed is under the control of St. Modwen.
3. The access strategy at Section 9 demonstrates there is a deliverable access strategy which accords with the requirements for acceptability on highway grounds set-out in the National Planning Policy Framework.

Accordingly, the development of the site is deliverable and given the substantial contribution to meeting that objectively assessed need for employment development, the allocation of the site is justified. There are no better sites that are not presently allocated to meeting that need for I&L development as demonstrated in Section 7 of the Industrial & Logistics Needs Assessment included at Appendix D. The site is deliverable, will meet objectively assessed needs and a market demand for employment development in Warrington.

THE PROPOSED ALLOCATION

With the above in mind, the site is required to be removed from the Green Belt to assist in ensuring that the emerging Local Plan can be found sound.

The allocation of the site for employment development is therefore evidenced and justified and we request that the site shown on the plan included in Section 6 is allocated for employment development as an allocation in Section 10 of the emerging Local Plan and the associated Policies Map, known as Policy MD7 – Junction 21, M6 – Rixton Employment Area.

The allocation can include details of uses, which we would described uses within Classes E(g), B2 and B8 and associated appropriate employment uses. An allowance would also be required for ancillary economic uses required to support the needs of employees and deliver sustainable development, which for example would include associated small-scale retail and also restaurants and cafes.

In addition, the policy would include details of phasing and site-specific requirements including green and blue infrastructure and utilities information as may be required.

As confirmed in Section 2, the case is put forward for the allocation of the St Modwen site for employment purposes, and we request the allocation on that basis.

However, in the event that the Local Planning Authority is also supportive of proposals that are being promoted on adjoining land for residential-led mixed use scheme, St. Modwen would be open to working with the Local Planning Authority and the adjoining landowners/promoters to agree a joint approach to promotion and delivery.

We welcome the opportunity to discuss the proposed allocation's terms in details to agree a form of wording that would enable the sustainable delivery of the site.

1. Table 46 of the EDNA

THE PROMOTION DOCUMENT DEMONSTRATES THAT THERE IS A **FULLY EVIDENCED AND JUSTIFIED REQUIREMENT** FOR THE ALLOCATION OF THE SITE AT J21 OF THE M6 FOR APPROXIMATELY 40HA OF EMPLOYMENT DEVELOPMENT TO MEET STRATEGIC INDUSTRIAL AND LOGISTICS DEVELOPMENT NEEDS FOR WARRINGTON.

The site is presently located in the Green Belt. However, there are no alternative sites within non-Green Belt locations that can meet the identified need for the proposed uses.

All of the land subject to this consultation response is under the control of St. Modwen. St. Modwen bring considerable experience and knowledge to the deliverability of the site. As demonstrated above, St. Modwen already has a unique long-term track-record of employment delivery in Warrington.

The Promotion Document demonstrates the two key requirements that support the allocation of the site, namely that:

1. The allocation of the site would meet an identified need for employment development; and
2. The development of the site is deliverable.

The need for the allocation of the site is substantial with a current shortfall in provision of land for employment development between approximately 195 – 250ha.

There is therefore an acute need for Industrial and Logistics development land in Warrington. The allocation of the site and subsequent proposal for employment development would make a material contribution to the requirement for additional employment development over the plan-period.

The assessment above also demonstrates that there are no constraints that would prevent the development of the site. To reach this conclusion the proposed development has been assessed from a highway, ecological, environmental, flood risk, drainage and geo-technical perspective.

It follows that, and as demonstrated in Section 13, the allocation of the site is required in order for the emerging Local Plan to meet the tests of soundness included at Paragraph 35 of the National Planning Policy Framework. Based on the evidence contained within this document, an Inspector would not be able to conclude that the emerging Local Plan as currently drafted would be sound under the terms required at Section 20 (5)(b) of the Planning and Compulsory Purchase Act 2004.

The allocation would also accord with the pro-growth basis on which the emerging Local Plan is based, and accord with the need to Plan for growth over the longer term so as to avoid the need to make further revisions to green belt boundary in a plan review.

We look forward to working with the Council to evolve the emerging Local Plan to ensure that it can be found sound before its submission for Examination and we kindly request a meeting to discuss the exciting opportunity at J21 of the M6 at the earliest opportunity.



Framework masterplan

St. Modwen Properties Plc



T: + [redacted]



ST.MODWEN



ST.MODWEN

WARRINGTON APPENDIX

November 2021





APPENDIX A
FLOOD RISK
TECHNICAL NOTE

| | | | |
|--------------|--------------------------------------|---------|------------|
| Project: | Junction 21, Birchwood | Job No: | 20-063 |
| Subject: | Flood Risk Technical Note | | |
| Prepared by: | Mazedur Rahman (Divisional Director) | Date: | 08/11/2021 |

HDR | Bradbrook Consulting Limited (Bradbrook) have been commissioned to assess the flood risk from various sources for the proposed development site located off M6 Junction 21 in Warrington. The Fishington Brook is classified as an ordinary watercourse which runs through the southern part of the site before discharging into River Mersey.

Background Information

The Level 1 Strategic Flood Risk Assessment (SFRA) produced by JBA Consulting in 2018 for Warrington Borough Council (WBC), assessed most parts of the proposed development site to be located in flood zone 2 and 3 (Appendix A). The flood map (Appendix B) produced by the Environment Agency (EA) as part of the Product 4 Flood Data is in line with the flood map shown with the SFRA. This is due to the fact the EA flood map was produced using the same model as the SFRA. Upon checking with the EA, it has been confirmed that *“The flood zone appears to be coming from JFLOW data, which is a generalised model and not suitable for Flood Risk Assessments.”*

WBC used the available flood data, although based on a generalised model, to assess the development site allocations. The assessment carried out based on the information provided within the Level 1 SFRA and the EA flood data.

The site allocation assessment concluded that although the sites are located in a strategically important areas, the recommendation was not progress with from the allocation as most part of the site is shown to be within Flood Zone 2 and 3.

An assessment was carried out by HDR | Bradbrook Consulting in 2020 to establish the risk associated with the fluvial and tidal flooding from the River Mersey and Manchester Ship Canal. A comparison between the EA modelled flood level data and the site levels suggest that the site is located at higher level than the flood water level. It is understood that the Flood Map for Planning is produced using a simplified JFLOW model. The Flood Map for Planning is also differs from the flood map produced by the EA's more detailed modelling of the Manchester Ship Canal.

Following consultation, the EA has accepted (Appendix C) the inaccuracy of the flood map and advised that the existing flood map produced using JFLOW model is not suitable for a Flood Risk Assessment (FRA). Therefore, an industry standard model, HECRAS river model, has been produced by HDR | Bradbrook using a combination of surveyed and LIDAR data.

The model results have been assessed against the Flood Modelling data and report produced by the EA, which confirms that the proposed development site is not at a risk of fluvial flooding (Appendix D).

Flood Risk Assessment Based on Updated Flood Model

As stated in the EA letter (Appendix C), the EA have produced an updated Manchester Ship Canal flood model in April 2021 and updated the Flood Map for Planning (Figure 1 below). The updated flood map is in line with the map produced by HDR | Bradbrook Consulting using HECRAS model.

Based on the latest flood map (Figure 1 and Appendix E), most of the site is located within Flood Zone 1, defined as land having a less than 1 in 1,000 annual probability of river or sea flooding. Only a small land parcel located adjacent to the River Mersey is shown to be within Flood Zone 2 and 3. The proposed development plan in Appendix E shows the updated flood extent next to Parcel 12.

The National Planning Policy Framework (NPPF) considers the vulnerability of different forms of development to flooding; and classifies the proposed development as 'Less Vulnerable'. Any type of development is allowed within Flood Zone 1.

Following the updated flood data, the WBC has issued a SFRA Addendum in August 2021 to take account of the updated flood maps.



Figure 1: Flood Map for Planning (Source: <https://flood-map-for-planning.service.gov.uk/>)



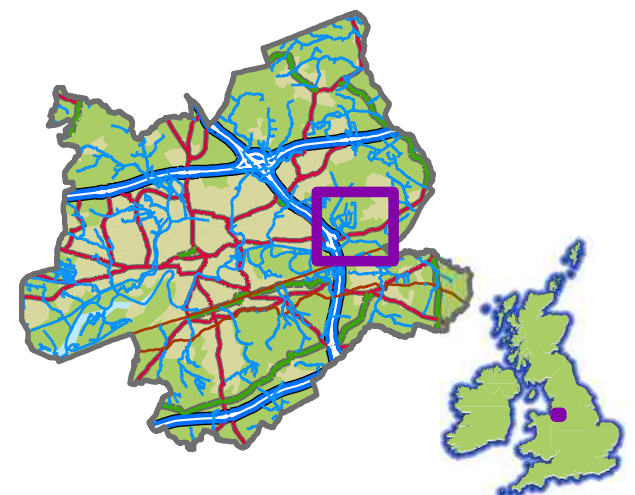
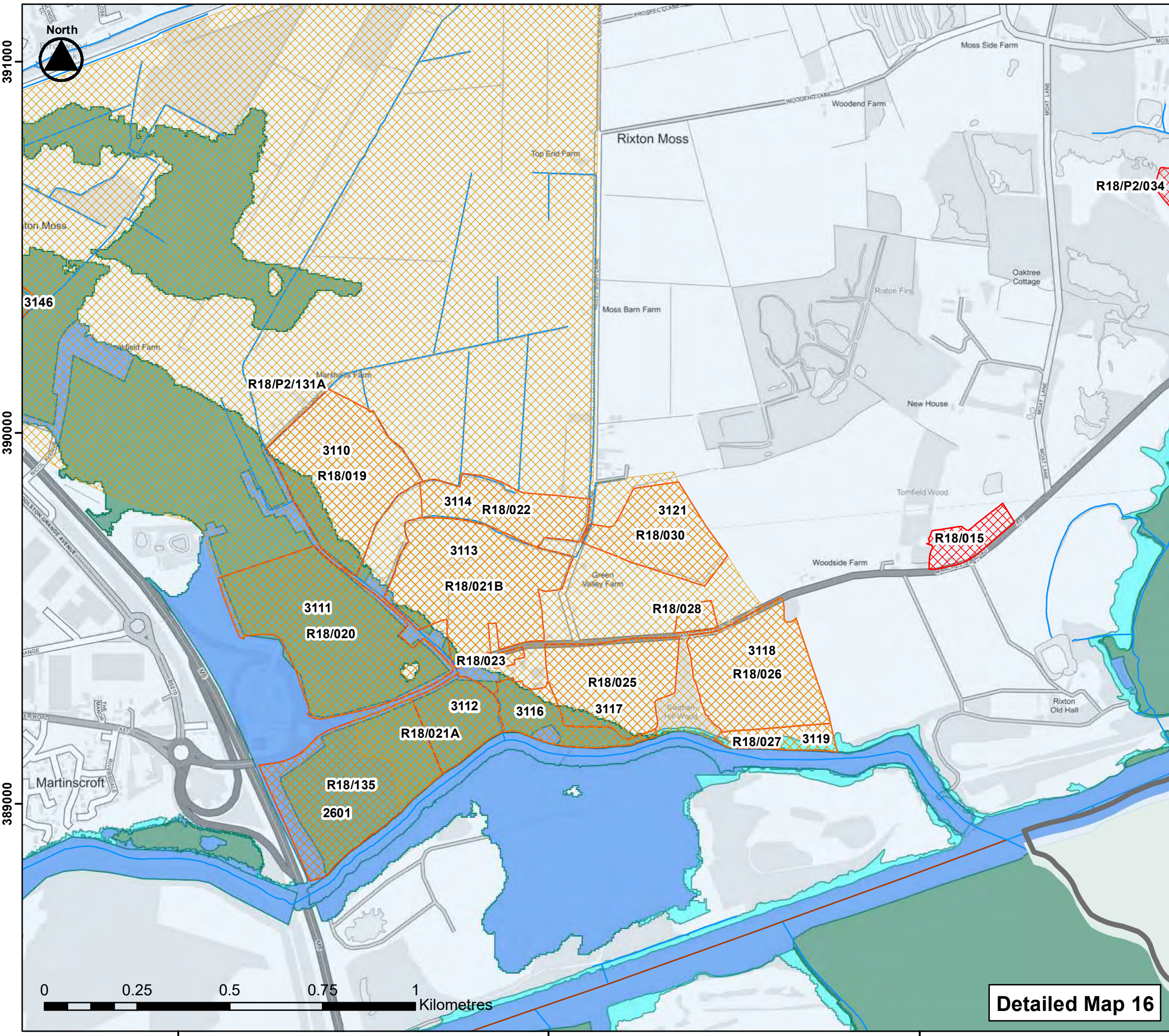
Figure 2: Surface Water Flood Map (Source: <https://flood-warning-information.service.gov.uk/>)

The proposed development site has also been assessed against surface water flood risk. The extent of flooding from surface water is presented in the GOV.UK online map at a strategic scale. It can be seen from the surface water flood extent map in Figure 2 that the site and surrounding areas are at low risk of surface water flooding.

The proposed development site has also been assessed against sewer, groundwater and flooding from artificial sources and concluded as low risk.

Therefore, in summary, the site is assessed to be at low risk from all sources of flooding and development of any vulnerability class can be built. It is recommended to utilise sustainable surface water drainage design and construction methods for future betterment of the development.

Appendix A – Flood Map from Level 1 SFRA



**LEVEL 1
STRATEGIC FLOOD RISK ASSESSMENT**
For
WARRINGTON BOROUGH COUNCIL

Please select a data type from the dropdown menu below that you wish to view:

- WBC Boundary
- Canal
- Watercourse
- Flood Zone 3b
- Flood Zone 3a
- Flood Zone 2
- Development Sites**
- Employment
- Gypsy & Traveller
- Mixed Use
- Residential

Show Site Reference Labels

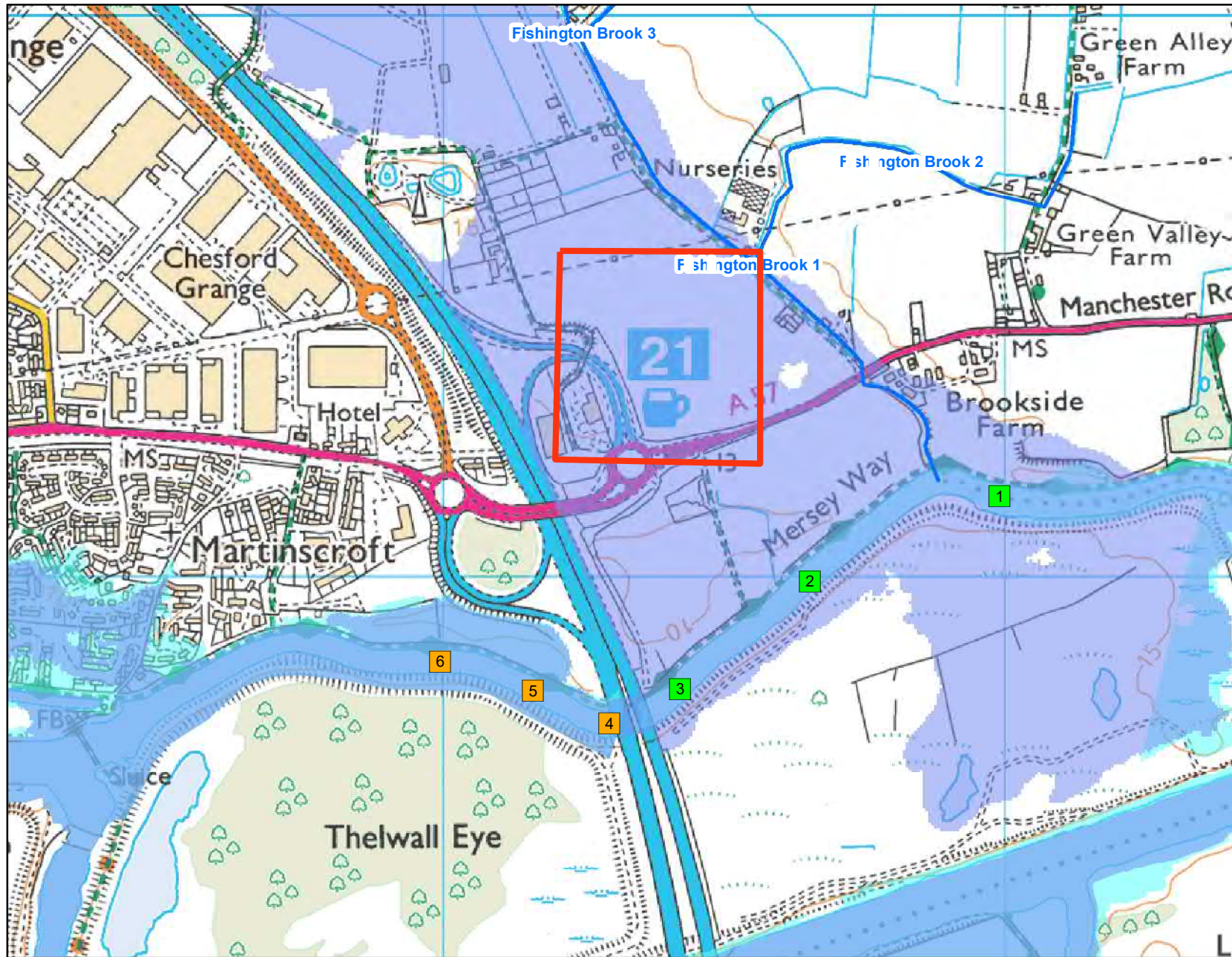


Detailed Map 16

© Crown copyright. All rights reserved. 2018 Licence number 100019628. Contains Ordnance Survey Data © Crown copyright and database right (2018).

Appendix B – EA Flood Map from Product 4 Data, dated 02.12.2019

Detailed Flood Map centred on Manchester Road, Warrington, WA3 6DR. Created on 02/12/2019 [GMMC152641CC]



1:10,001



Legend

- Site Location
- Mersey Estuary 2016
- River Mersey 2017
- Main River
- Flood Zone 3
- Flood Zone 2

Appendix C – EA consultation Letter

Bradbrook Consulting



Our ref: SO/2020/120793/02-L01

Agreement No: ENVPAC/1/GMC/00315

Your ref: A57, Warrington

Date: 11 March 2021

FAO Mazedur Rahman

Dear Sir

**COMMERCIAL AND RESIDENTIAL LED MIXED-USE DEVELOPMENT
OFF THE A57 IN WARRINGTON, TO THE EAST OF THE M6 MOTORWAY
ALONGSIDE JUNCTION 21, AND SOUTH OF BIRCHWOOD STATION ON THE
LIVERPOOL-MANCHESTER MAINLINE RAILWAY**

Thank you for accepting our offer to provide detailed planning advice. We are providing this advice under Agreement No. ENVPAC/1/GMC/00315. Please note we have taken 2.5 hours to review your notes from our meeting on 17 December 2020, and provide our response.

Detailed comments

We have reviewed your meeting notes and can confirm that they are an accurate account of the meeting apart from DH should read CE, as it was Caroline Edwards who was giving the advice, and note 12, I have recorded that the model was to be sent into us for review.

Our Partnership and Strategic Overview and Sustainable Places teams do not review models so any topography or modelling work that requires review to support the idea that the current flood map and model for that area is incorrect is by proving it through your own model, which is where we believe we are at with your enquiry, or waiting for the Environment Agency to remodel the whole area, which can take some considerable time.

We therefore recommended that if you wanted us to change the flood map or advise that our flood map is wrong then you would need to provide the evidence. This is why your model needed to be reviewed when it was first sent in. If our Evidence & Risk team would have been able to approve the model, then that would have been an easy way to change the flood map quickly to save waiting for the Manchester Ship Canal (MSC) outlines to be published, which could be many months. So we gave two options: either wait for the MSC model outlines to be published or send in your own model to prove that the area wasn't in flood zone 2 or 3 and then we would have been able to provide a statement of confidence around the current flood zones so that Warrington Borough Council could have some confidence in this development. We did recommend a flood

Environment Agency



www.gov.uk/environment-agency

Cont/d..

map challenge be undertaken should you need the flood map status changing before the MSC outlines are published.

We have received approval that we can share the draft outlines from the new MSC 2018 model for you to use as a reference point (see attached). Please be aware that this model is still in draft form and so the outlines are still subject to change, although unlikely at this late stage.

Please also be aware that we are providing these maps only as an exception for Warrington Borough Council, this is not something we would normally share until they have been published.

Next Steps

We recommend that you either continue with the model review, to allow us to have the confidence that development can go ahead on this site and follow this with a flood map challenge, if you require the flood maps to be changed within the next 6 months. If not urgent, then wait for the MSC outlines to be published.

If there is any further work you anticipate needing our detailed advice on in relation to this project let me know so it can be incorporated into this charging statement.

Yours faithfully

Ms DAWN HEWITT
Planning Advisor





Manchester Ship Canal Flood Map Comparison - Flood Zone 2
Created on 01/03/2021 [GMMC152641CC - ENVPAC/1/GMC/00315]



1:25,000



Legend

-  MSC 2018 Model DRAFT FZ2
-  Current Flood Zone 2



Manchester Ship Canal Flood Map Comparison - Flood Zone 3
Created on 01/03/2021 [GMMC152641CC - ENVPAC/1/GMC/00315]



1:25,000



Legend

-  MSC 2018 Model DRAFT FZ3
-  Current Flood Zone 3

Appendix D – Flood Map Produced By HDR | Bradbrook Using HECRAS Model



LEGEND

- PROPOSED SITE BOUNDARY
- FLOOD ZONE 2 (1:1000 YEAR EVENT)
- FLOOD ZONE 3 (1:100 YEAR EVENT)

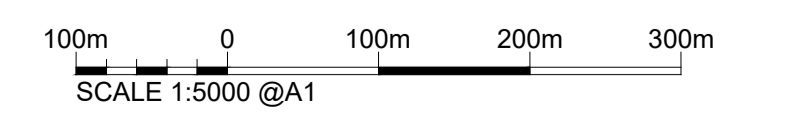
NOTES:

1. THIS DRAWING IS NOT TO BE SCALED. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.

THIS SECTION OF WATERCOURSE IS UNACCESSIBLE DUE TO VEGETATION. THEREFORE, LIDAR DATA HAS BEEN USED, WHICH USES A MORE UNIFORM LEVELS BASED ON THE RESOLUTION AND MAY HAVE RESULTED IN FLOODING DUE TO A LOWER BANK LEVEL.

| POINTS TABLE | | | | |
|--------------|-------------|-------------|--------------------|-------------------|
| POINT # | EASTING | NORTHING | 1:1000 WATER LEVEL | 1:100 WATER LEVEL |
| 1 | 366,266.958 | 390,332.162 | 14.95m AOD | 14.39m AOD |
| 2 | 366,241.954 | 390,288.863 | 14.95m AOD | 14.39m AOD |
| 3 | 366,217.703 | 390,245.149 | 14.95m AOD | 14.39m AOD |
| 4 | 366,188.882 | 390,205.306 | 14.95m AOD | 14.38m AOD |
| 5 | 366,175.930 | 390,159.384 | 14.95m AOD | 14.38m AOD |

THIS IS A HIGH LEVEL FLOOD ZONE MAP PRODUCED USING A COMBINATION OF HEC-RAS MODELLING RESULTS, TOPOGRAPHICAL SURVEY AND LIDAR DATA IN CIVIL 3D.



Appendix E Updated Flood Map for Planning (Source : EA)

Flood map for planning

Your reference
Birchwood

Location (easting/northing)
366516/389387

Created
2 Nov 2021 16:30

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

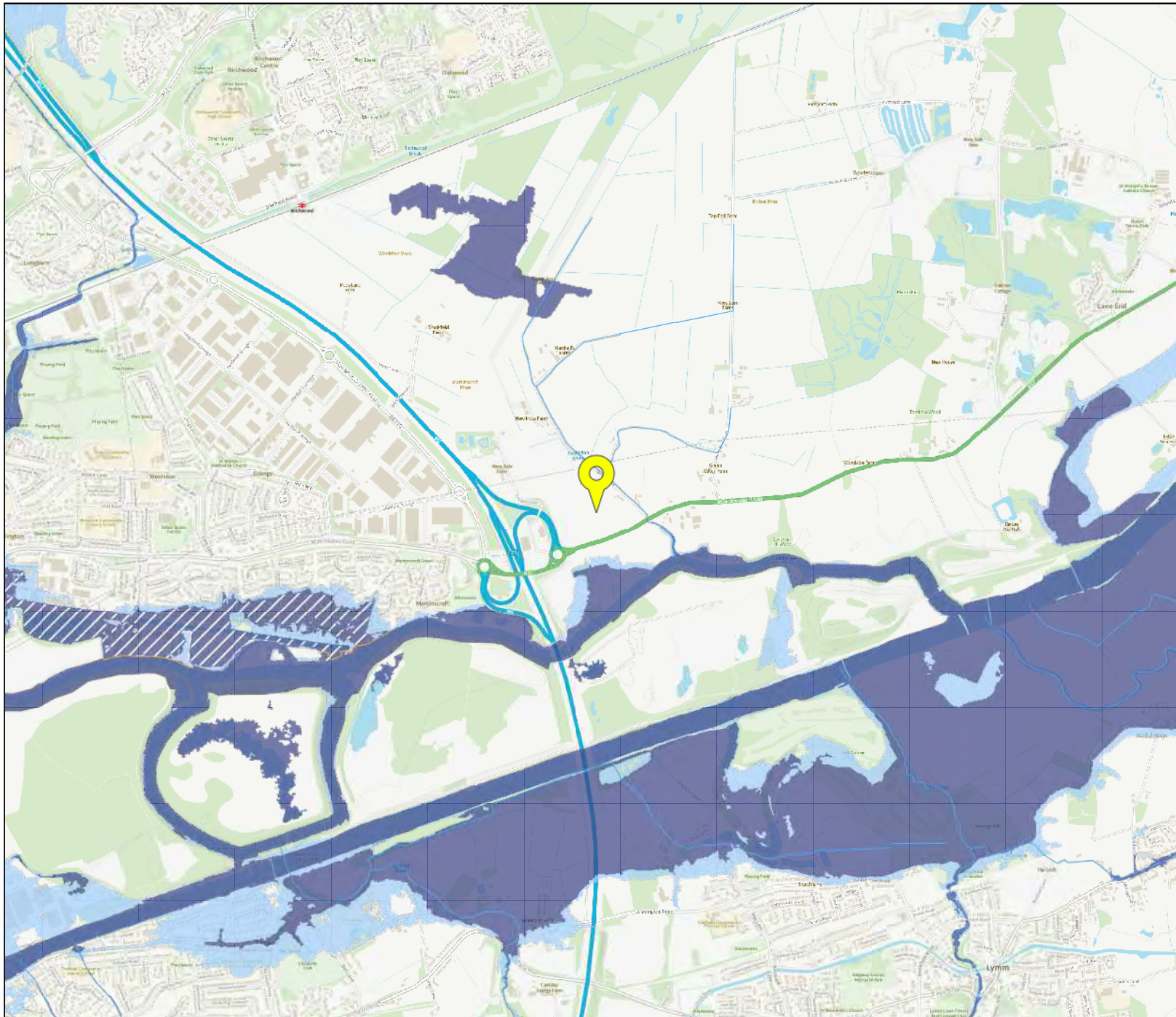
Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Flood risk data is covered by the Open Government Licence which sets out the terms and conditions for using government data. <https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

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

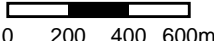
Flood map for planning

Your reference
Birchwood

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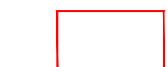

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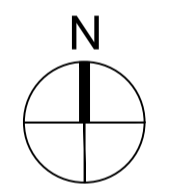
-  Selected point
 -  Flood zone 3
 -  Flood zone 3: areas benefiting from flood defences
 -  Flood zone 2
 -  Flood zone 1
 -  Flood defence
 -  Main river
 -  Flood storage area
- 
 0 200 400 600m

Appendix F – Proposed Development Masterplan

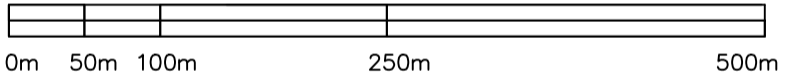
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Key

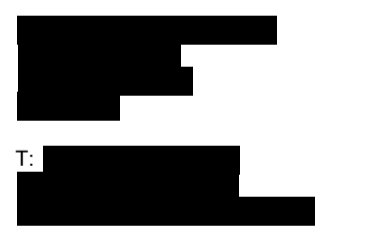
-  Site Boundary
-  I&L
-  Open space
-  Primary access(18.8m width)
-  Opportunity for link across Brook Lane
-  Land for potential ecological mitigation
-  Overhead power line and easement -22.5m(TBC)
-  Flood Risk 1:100 yr (Lidar)
-  Flood Risk 1:200 yr (Lidar)
-  Flood Risk 1:1000 yr (Lidar)
-  Listed milestone on A57



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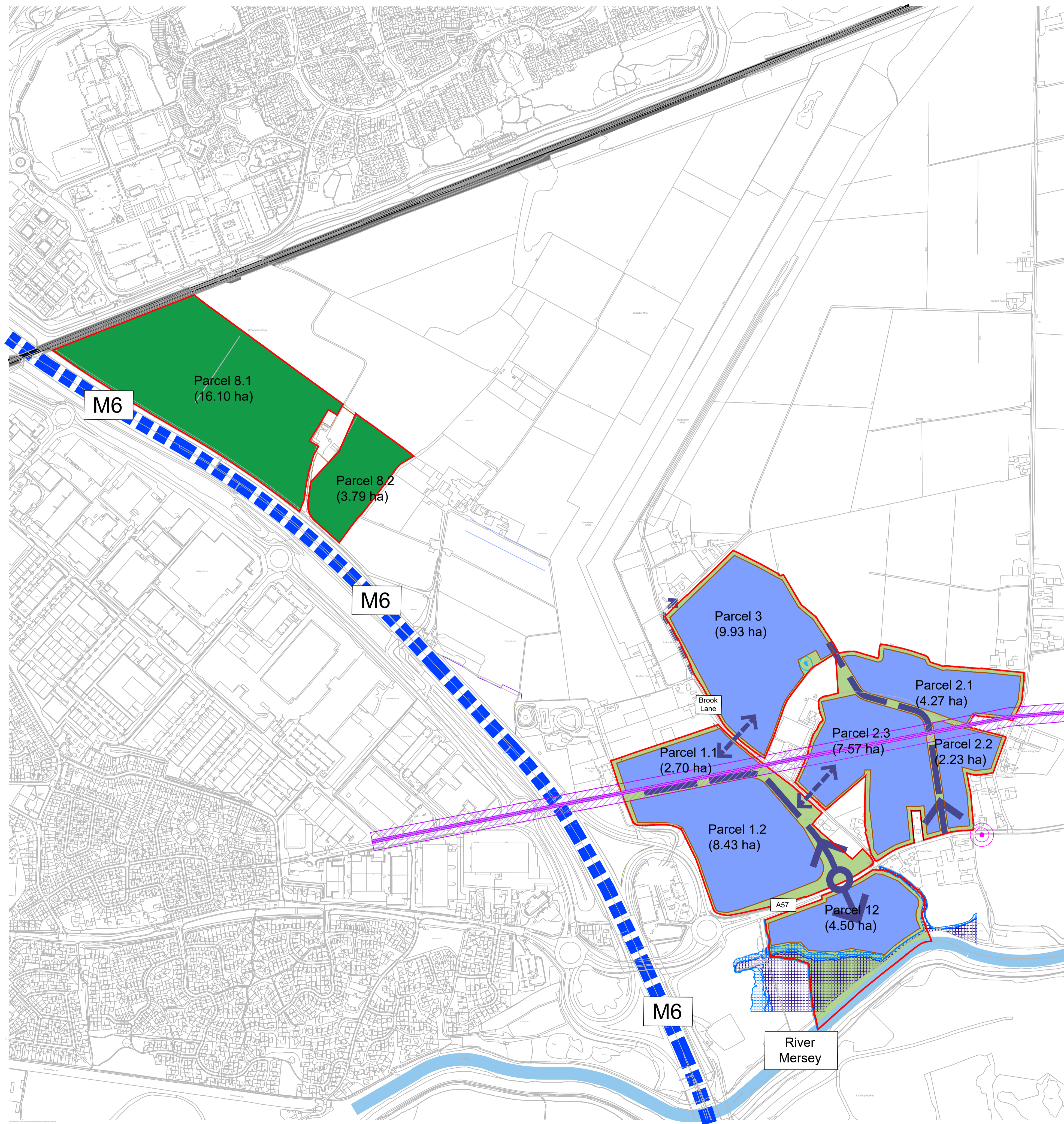
Client
St Modwen
Project
Warrington M6 J21

Description
Framework masterplan

Status
DRAFT

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| Scale | Drawn | Date |
| 1:5000@A1 | BM | October '21 |
| Job number | Drawing number | Revision |
| 34799 | 03-200 | C |

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APPENDIX B
TRAFFIC & ACCESS
APPRAISAL



Land adjacent to M6 J21
Warrington
Traffic & Access Appraisal

Sweco UK Limited



01/11/2021
Project Reference: 65201825
Document Reference: Rep02
Revision: 3
Prepared For: St Modwen Logistics

Status / Revisions

| Rev. | Date | Reason for issue | Prepared | Reviewed | Approved |
|------|----------|-------------------------------|-------------|--------------|--------------|
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| 1 | 09.11.21 | Final | JS 09.11.21 | NJR 09.11.21 | NJR 09.11.21 |
| 2 | 10.11.21 | Change in development quantum | JS 10.11.21 | NJR 10.11.21 | NJR 10.11.21 |
| 3 | 11.11.21 | Minor amendments | JS 11.11.21 | NJR 11.11.21 | NJR 11.11.21 |

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1 Introduction

1.1 Background

This report presents the results of a Traffic and Access Appraisal examining the opportunities for the development of land to the east of the M6 J21 for industrial and logistics land-uses.

Site visits have been undertaken to observe the background highway conditions on the A57 Manchester Road site frontage and surrounding highway network to inform the study.

Discussions have been initiated with Warrington Borough Council (WBC) and National Highways (NH) regarding the key transport planning principles to be addressed within any future Transport Assessment. Agreement has been reached with both parties on assessment parameters to enable a preliminary assessment to be undertaken examining access opportunities from the A57.

1.2 Scope of Study

This study is focussed on establishing the baseline traffic / highway and transport planning characteristics of the site and assessing the deliverability of an access strategy to the development site from the A57.

The key aims of the study are to:

- Review the accessibility of the site for pedestrians, cyclists, and public transport;
- Establish the baseline highway conditions and opportunities for taking access to the development land from the A57 frontage;
- Review the historical injury accident record for the A57;
- Formulate an access strategy for the development land to the north and south of the A57 Manchester Road;
- Identify the likely traffic generation from the proposed development and test this against the identified access strategy; and
- Inform the development of the masterplan.

2 Site Context

The potential development site comprises the parcels of land shown in **Figure 2.1** below and. The total site area is 40.25ha with a net developable area of 38.64ha.. In addition to the land identified for employment, there are two further parcels of land (within the area to the north west of the A57) which are identified as 'land for ecological mitigation / biodiversity net-gain' (see **Appendix A**).

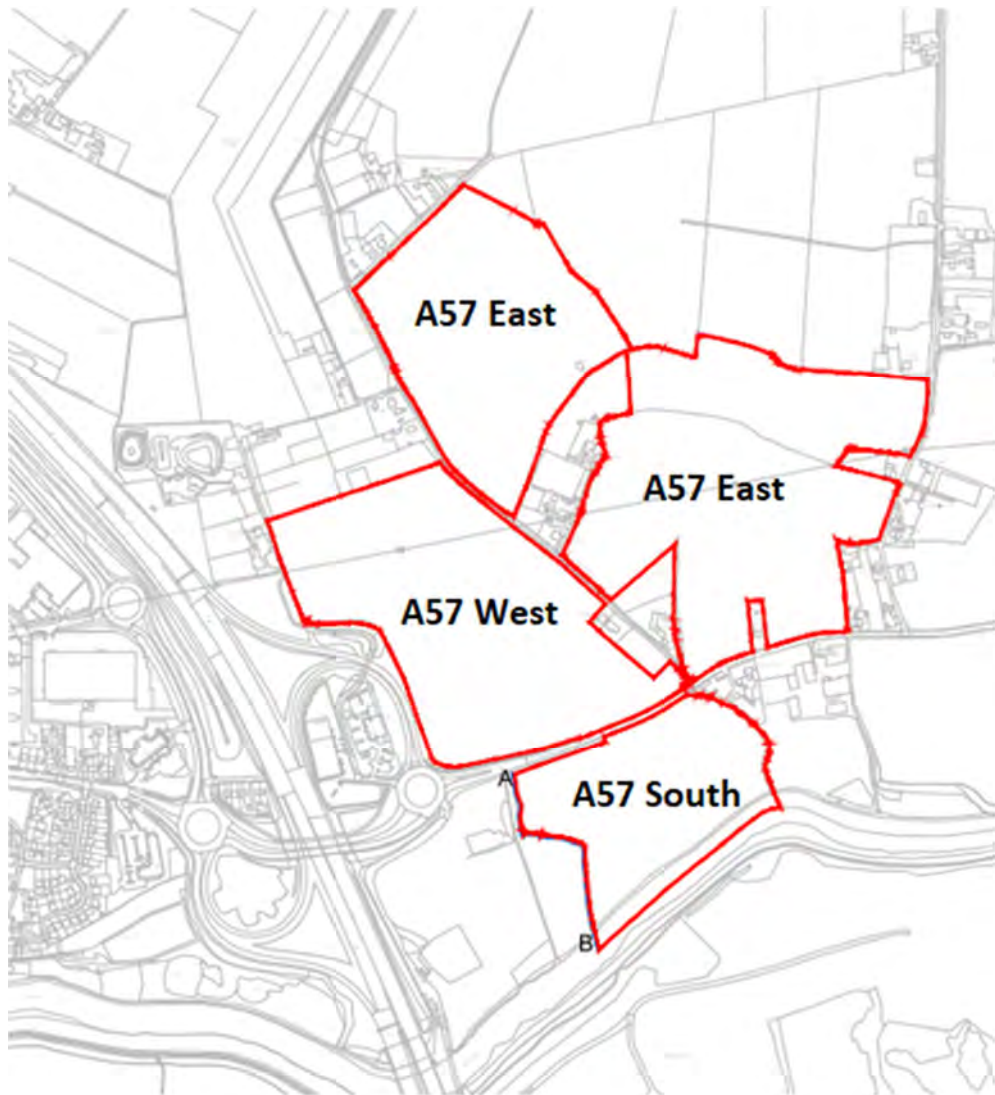


Figure 2.1 – Development Site land parcels

The land for development is located to the east of the M6 J21 and comprises areas to the north and south of the A57 Manchester Road. The land to the north is bisected by Brook Lane. There are no active points of access onto the A57. The land is undeveloped and in agricultural use.

2.1 Accessibility

2.1.1 Walking

The areas to the west of the M6 (Martinscroft / Woolston / Fearnhead) and the north of the railway line (Birchwood) are highly urbanised with a dense development pattern. In contrast, the development land and the adjacent areas east of the motorway, (prior to reaching Cadishead), are undeveloped, being predominantly agricultural land with scattered residential properties and small scale business premises. As such, there is currently limited pedestrian infrastructure adjacent to the A57 and within the site. This is not entirely unexpected given the minimal historical pedestrian demand and therefore need for supporting infrastructure.

A footpath of between 1m to 1.5m width is provided on the northern frontage of the A57 adjacent to the site frontage. This is of a variable quality with some sections in poor condition and of a sub-standard width. There is no footway on the southern frontage. The existing provision is shown in **Photo 2.1** and **Photo 2.2**. The photographs were taken from a point approximately 80m west of the Brook Lane/ A57 junction.



Photo 2.1 – A57, looking east



Photo 2.2 – A57 looking west

To the west, a segregated cycle / footpath is provided on the A57, with uncontrolled crossings through the dumb-bell-roundabout junction at M6 J21.

The development of the site for employment land-use would facilitate the provision of significantly improved pedestrian facilities within the site and on the A57 frontage. This will provide an opportunity to establish links into the adjacent areas and the existing PRoW network which would benefit all users.

2.1.2 Public Rights of Way

There are a number of Public Rights of Way (PRoW) which pass through, or are adjacent to the site, and which provide connections to the PRoW network in the surrounding area. The PRoW network is shown on **Figure 2.2**. A larger scale map identifying the individual PRoW is enclosed as **Appendix B**.

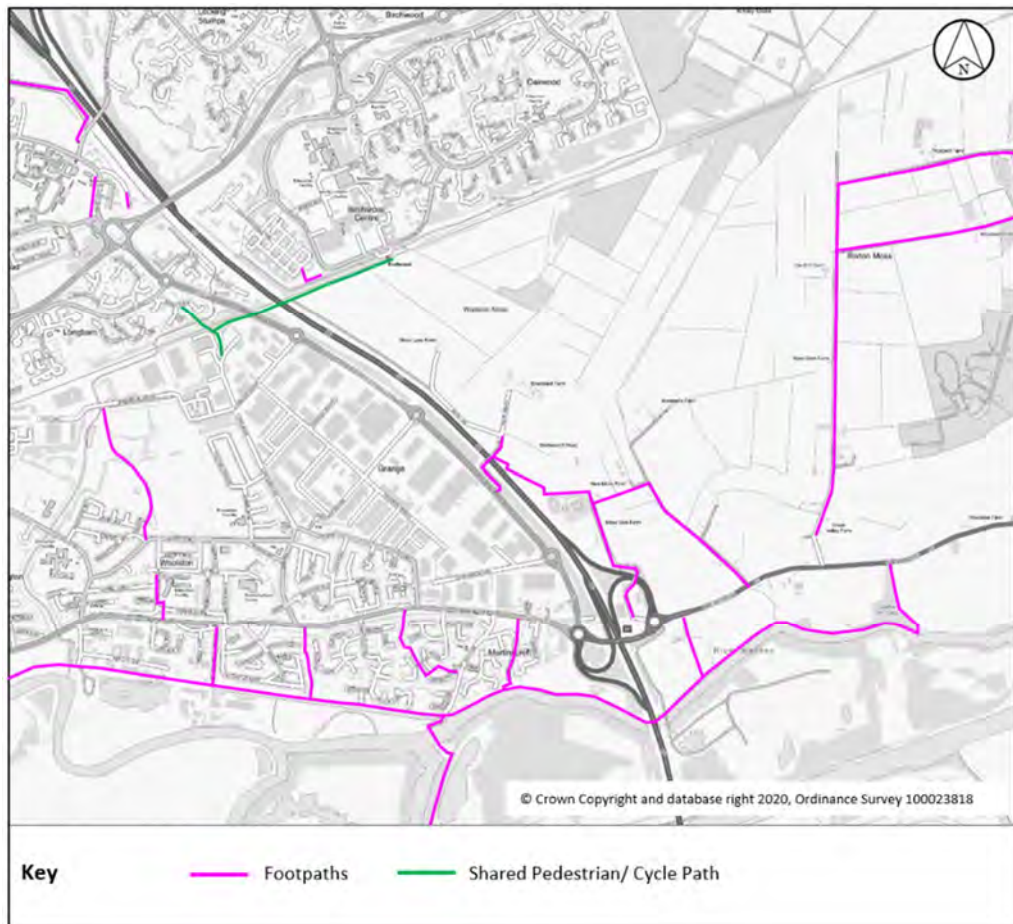


Figure 2.2 – PRoW network

Footpaths 00329/15, 00329/14, 00329/12 and 00329/11 run through the site from Juniper Farm at the M6 J21 to Nicol Avenue to the north west. Nicol Avenue connects to Woolston Grange Avenue via a bridge over the M6, however this is a private road and no pedestrian facilities are present on Woolston Grange Avenue to provide onward links.

Footpath 00329/17 runs in a roughly north-south direction along Brook Lane, which is narrow and is unadopted from its junction with the A57. It connects to Footpath 00329/15 at its northerly extent.

Footpath 00255/2 runs along Holly Bush Lane, which at two points forms the eastern boundary of the site. This connects to footpaths 00255/4 and 00255/3 running

eastwards along Woodend Lane and Prospect Lane, respectively. Holly Bush Lane is unadopted to the north of Green Valley Cottage.

The PRow record also shows a footpath running from the southern frontage of the A57 to connect with an east-west footpath along the River Mersey. Its location and the connecting point with the A57 is marked with a finger post sign, although the entrance is overgrown, which suggests that it is rarely used. The footpath is on the boundary of the parcel of land south of the A57 and connects the Woolston New Cut Canal to Mile's Bite Canal comprising various PRow (00255/1, 00329/27, 00329/25-25a, 00329/23, 00329/21, 00329/20, 00246/5, 00246/3, 00246/4, 00246/27). There are onward connections to footpaths 00329/26 on Statham Lane, 00329/24 on Battery Lane, 00329/31 along the River Mersey and 00329/30 / 00329/22 on Bridge Lane.

To the north, a combined pedestrian / cycle path runs from Kingsland Grange to Sage Close and Birchwood Railway Station to the east (shown on **Figure 2.2** in green). Although the route is signed from each access point, it is not identified as a PRow.

Information on the PRow in the area has been extracted from WBC Interactive Web Map and correlates with the footpaths shown on the adopted highway information. The Web Map does not show any bridleways in the vicinity of the site.

As indicated above, the development of the site will enable the improvement of pedestrian facilities on the A57 frontage and within the site and will facilitate links with the PRow network offering a major improvement in connectivity to and through the area.

2.1.3 Cycling

Cycle infrastructure in the vicinity of the site is shown on the Warrington Cycle Map, attached as **Appendix C**.

No dedicated cycle infrastructure is provided on the A57 along the site frontage. A segregated cycle / footpath is provided to the west on the A57 through the dumb-bell roundabout junction with the M6 J21. All of the crossings are uncontrolled, but advanced signage is provided to warn approaching motorists. On the A57 to the east of J21 the cycle path terminates, and cyclists are required to join the main carriageway.

A combined pedestrian / cycle path runs from Kingsland Grange to Sage Close and Birchwood Railway Station and provides a connection between Woolston Grange Industrial Estate, the residential areas to the north and the railway station.

An unpaved cycle path runs along Birchwood Brook parallel to Dewhurst Road and provides a traffic free route from the railway station to Millennium Business Park to the west and the residential areas to the east of Birchwood Shopping Centre. A shared cycle / footway is also provided on the southern frontage of Dewhurst Road.

A number of shared cycle / footpaths run along the River Mersey, the Manchester Ship Canal and Woolston New Cut Canal. These provide traffic free scenic routes within easy reach of the site to the south west, although the connections to them from

the north are poor and the A57 is currently a barrier to movement for both cyclists and pedestrians.

The closest National Cycle Route (NCR) is NCR62 which runs in an east-west direction through Lymm as shown on **Figure 2.3**. It can be accessed via connections to the existing cycle paths alongside the River Mersey and the Manchester Ship Canal but is a significant distance from the site and is therefore of interest only in the broadest sense.

The development of the site for employment land-use will facilitate the provision of new combined pedestrian / cycle facilities within the site and on the A57 frontage.

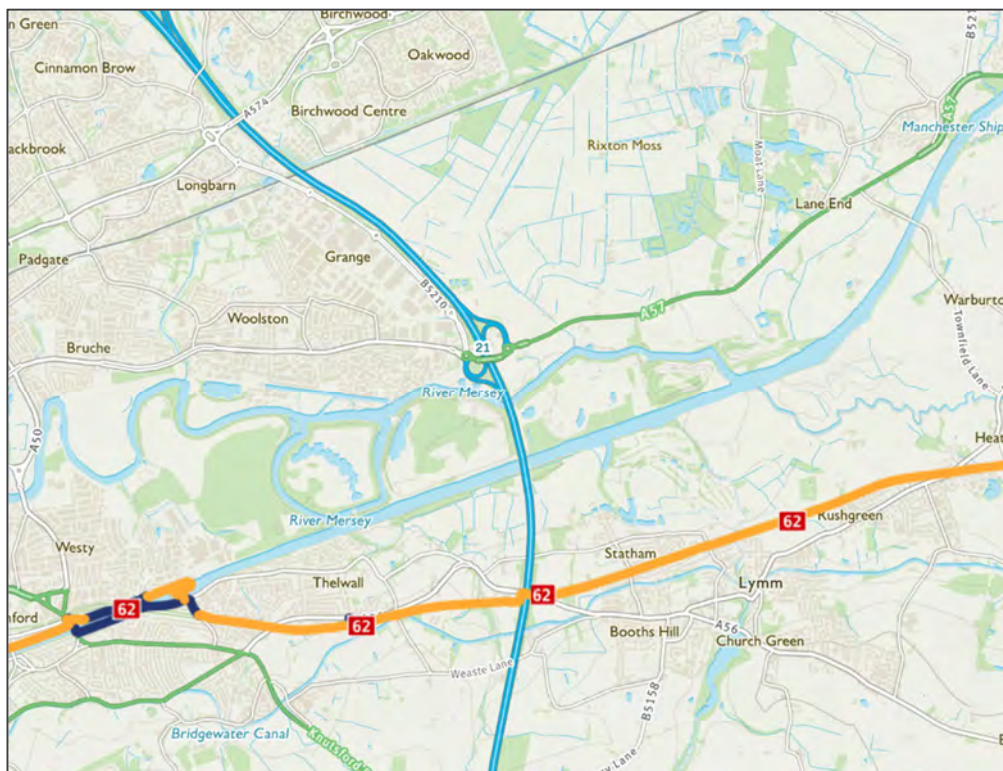


Figure 2.3 – NCR 6 (Sustrans/ OS Maps)

2.1.4 Public Transport

2.1.4.1 *Bus*

Given the largely undeveloped nature of the area between the M6 and Cadishead, the existing public transport infrastructure on the A57 in the vicinity of the site is limited.

The closest bus stops are located on the site frontage, approximately 100m to the east of the A57 / M6 Southbound roundabout. The bus stops comprise a pole and yellow 'bus cage' marked on the carriageway. There are no shelters and on the westbound frontage of A57 there is no footway, (as shown on **Photo 2.3**).



Photo 2.3 – Bus stop on the southern frontage of the A57

An eastbound bus stop is also provided adjacent to the A57 / Brook Lane junction. This is of a similar quality to those further to the west although there is no bus cage marked at this location. A corresponding westbound bus stop at this location is shown on the Google and Traveline journey planner websites.

The bus stops provide access to three services, namely the 40B, P5 and 100. Two of these (40b and P5) are school services only. Service 40B is a school bus which runs between Martinscroft and Lymm High School on schooldays, with one service in the morning and one in the afternoon. Service P5 is a school bus running between Priestley College and Irlam, with one service in the morning and one in the afternoon. The No100 service is currently the only public bus passing the site and runs between Warrington and Manchester, via Cadishead, Irlam and Eccles. The service runs hourly Monday to Sunday.

The development of the site for employment land-use will enable the provision of significantly improved public transport facilities on the A57, with internal connections provided to deliver PT access into and through the development.

2.1.4.2 Rail

The closest railway station is at Birchwood to the north of the development site.

The station is on the Liverpool / Manchester line, with trains running via Warrington Central. The latest timetable for the station was published in June 2021. There are services every 15 to 30 minutes to Liverpool Lime Street and Manchester Oxford

Road Monday to Saturday and services every 20 minutes to an hour on Sundays. There are hourly services to Manchester Piccadilly and Manchester Airport Monday to Saturday and limited services on Sundays. The service also provides connections to a number of local destinations, including Urmston, Irlam, Widnes and Hough Green.

2.2 Existing Highway Network

2.2.1 A57 Manchester Road

The A57 is a single carriageway road with a typical carriageway width of 7.3m from its junction with M6 J21 eastwards where it forms the boundaries of the site areas to the north and south of Manchester Road. It is street lit and subject to a 50mph speed limit. There are no Traffic Regulation Orders (TROs) in force. Footway provision is intermittent and of a variable quality and width.

The extent of highway adoption along the A57 site frontage is as to be expected, with no obvious anomalies. The adopted highway record is provided in **Appendix D**.

Signs repeated along the route highlight that the A57 is identified as a road safety 'Red Route' due to the number of recorded casualties. However, this is not borne out by analysis of the recent personal injury accident record presented in Section 2.3. We understand from subsequent discussions with WBC that the Red Route classification is now somewhat historical for this section of the A57, but the signs have been left in-situ to act as a visual speed deterrent.

The A57 is an important local distributor road which provides a link from the M6 J21 to the M60 Junction 11 Manchester Ring Road via Cadishead, Irlam and Barton Moss.

In the vicinity of the site, the A57 provides direct access to a number of residential properties, farms and small businesses and forms simple priority junctions on its northern frontage with Brook Lane and Holly Bush Lane.

2.2.2 Brook Lane

Brook Lane is a single-track road which provides direct access to several light industrial businesses, residential and farm properties. The highway is adopted for approximately 30m from its junction with the A57 after which it is a private road which bisects the east and west development areas north of the A57. It terminates at the existing farm. The extent of adoption at the A57 / Brook Lane junction is greater than it appears on-site due to the poor condition of the carriageway within the mouth of the junction.

2.2.3 Holly Bush Lane

Holly Bush Lane is a single-track road and provides direct access to a number of residential, light industrial and farm properties. To the north it has connections with Woodend Lane and Prospect Lane before terminating at the railway line. The highway is adopted for approximately 130m from its junction with the A57 and is a private road thereafter. Holly Bush Lane is out-with the development land and forms the easternmost extent of the site where it abuts at two locations.

2.2.4 Juniper Lane

Juniper Lane is a private single-track road from its junction with the eastern M6 J21 dumb-bell roundabout adjacent to the Mercedes car dealership. It crosses the M6 slip

roads via a bridge which has a 32 tonne weight limit restriction and continues northbound, providing access to a residential and light industrial property. It is out-with the development site, but runs immediately adjacent to the site boundary.

2.3 Personal Injury Accident Data

STATS19 accident data has been requested from WBC to enable a detailed assessment of the accident record for the A57 in the vicinity of the development site. Pending receipt of this data a review of information within the CrashMap database has identified a total of 11 injury accidents over the last full five year period (2016 -2020 inclusive). The accident locations are shown on **Figure 2.4**.

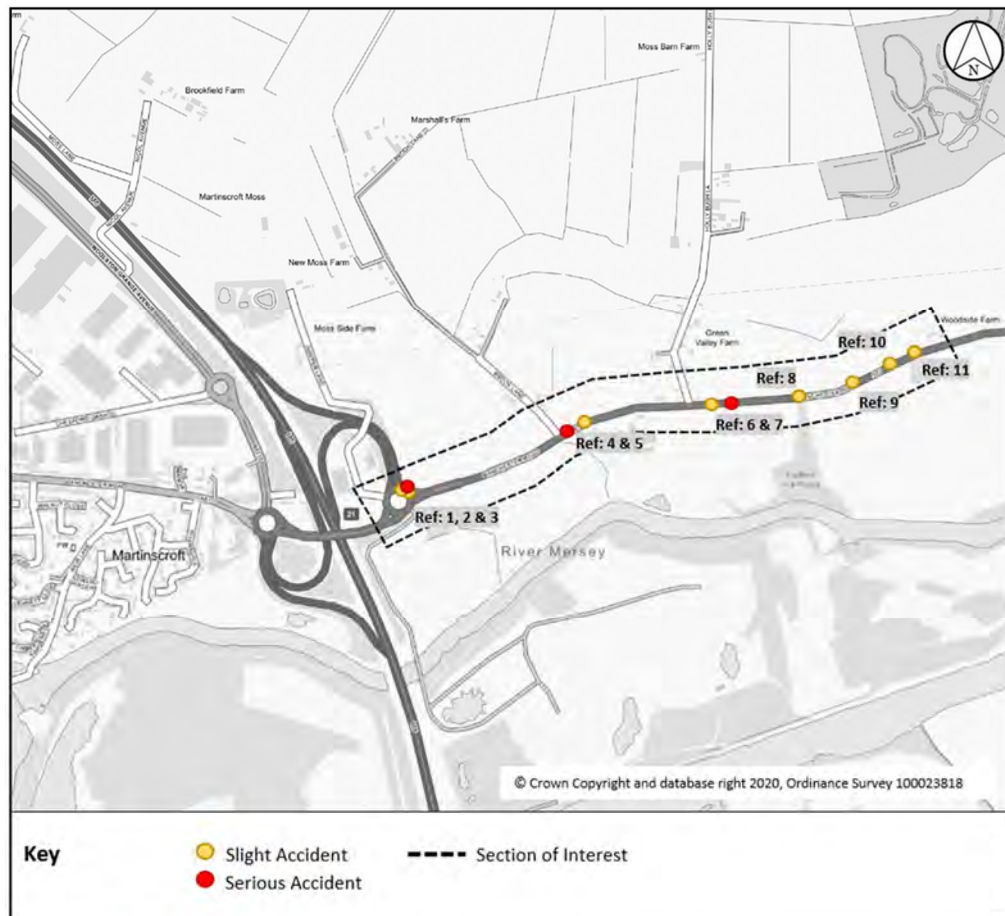


Figure 2.4 – Recorded Injury Accidents (2016 – 2020 inc)

A total of 11 injury accidents were recorded in the five year period examined. The majority of the accidents on the A57 were recorded as being of slight severity, however three serious accidents also occurred in the area of interest, two of which involved a motorcycle. One serious accident occurred at the A57 / M6 Southbound Off-Slip roundabout (Ref: 1) and a further two occurred on the A57 itself (Refs: 4 & 7), one close to the Brook Lane junction and the other to east of Holly Bush Lane.

The serious accident at the roundabout (Ref: 1) occurred in 2018 and involved a motorcycle losing control. The accident adjacent to the A57 / Brook Lane junction (Ref: 4) occurred in 2016 and involved an offside collision between a car and a motorcycle when the car was making a right-turn into Brook Lane. The accident east of Holly Bush Lane (Ref: 7) occurred in 2016 and involved a front-end collision involving a car and an 'object' in rainy conditions.

Examining the slight injury accidents recorded, one involved a motorcycle (Ref: 5) colliding with a car whilst overtaking. The other eight accidents included one single vehicle accident during bad weather and six collisions involving two or more vehicles.

Overall, there are no clusters of accidents on the A57 and the overall numbers in the five year period examined does not suggest a historical road safety issue. There were no fatal accidents, only one accident involving a cyclist and no accidents involving pedestrians, or HGVs.

The statistics indicate that there are no historical road safety issues of concern on the section of the A57 passing the development site. The existing character of the surrounding area and the A57 itself means that currently pedestrian and cycle numbers are likely to be low, which would change if the proposed development comes forward, as would the proportion of HGVs as a percentage of total traffic. Taking this into account, the scheme will provide a high standard of infrastructure for cyclists and pedestrians.

3 Design Guidance

3.1 Prevailing Design Criteria

3.1.1 Design Manual for Roads and Bridges

The Design Manual for Roads and Bridges (DMRB) contains requirements and advice relating to works on motorway and all-purpose trunk roads. Whilst the A57 is not a designated trunk road, it is a primary distributor road and therefore DMRB is considered to offer appropriate design guidance for any new, or upgraded, highway infrastructure.

The preliminary access strategy, comprising proposals for infrastructure changes on the A57 site frontage, including the establishment of new site access junctions, have been informed by DMRB standards.

3.1.2 WBC Design Guidance

The WBC Design Guide for Residential and Industrial Estate Roads was published in 2008 and has been partially superseded by more recent guidance. However, the advice on the design of roads and junctions remains the prevailing guidance for new highway infrastructure on the local highway network.

3.2 Internal Road Layout

As the main estate infrastructure will be required to provide access for industrial and logistics development, the spine roads within the site will be designed to accommodate the specification for an industrial distributor road serving a quantum of industrial development greater than 125,000 sqm, (as specified within WBC design guidance).

The primary WBC design criteria specified for an industrial distributor road (serving +125,000 sqm) are:

- 60m centreline radii
- No direct access to properties from the main estate road.
- Junction separation of 40m opposite / 90m adjacent
- Carriageway width of 7.3m with a verge and combined cycle / footway on each side.

An illustrative cross section of the industrial distributor road is shown in **Figure 3.1**.

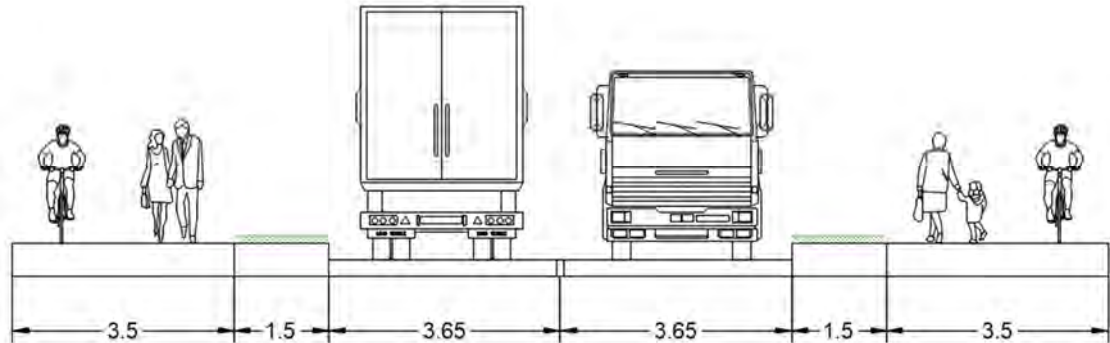


Figure 3.1 – Indicative Spine Road X-Section Dimensions (in metres)

3.3 Public Transport and Emergency Services Access

The scheme design will incorporate appropriate emergency services access to the development land and facilitate public transport access into and through the development site.

4 Traffic Data

4.1 Baseline and Assessment Traffic Flows

Sweco has liaised with WBC Traffic Modelling team to request turning flows from the validated Local Plan Traffic Model for the A57 / M6 J21 dumb-bell roundabout to provide link flow data for the section of the A57 passing the site. The Council has confirmed that the modelling of this junction is based on a mix of synthesised ATC and classified link counts, rather than traffic survey data. WBC cannot therefore provide turning matrices.

In view of this and in the absence of any historical (pre-pandemic) traffic data, classified turning counts were conducted in July 2021 (prior to the school holidays) to provide baseline traffic flows for the A57 corridor. Adjustment factors have been agreed with WBC and NH for a neutral month and to take account of the impact of Covid on peak hour traffic flows. As WBC is currently unable to facilitate use of the Warrington Transport Model, (due to Local Plan modelling work), TEMPRO factors have been agreed to take account of future / committed development. The adjusted traffic survey flows have been expanded to 2037 to provide the future year baseline scenario.

The trip rates, traffic generation and trip distribution for both LGVs (staff traffic) and HGVs have been agreed with WBC / NH and applied to the 2037 base traffic flows to produce the 2037 'with development' scenario, against which the operation of the A57 / site access junctions and the impact of the proposed development can be evaluated.

The derivation of these factors is set out below.

WBC is monitoring the impact of the Covid pandemic on traffic flows on six key routes, (including the A57 to the west of the M6), to assess how traffic flows compare with pre-pandemic levels. WBC confirmed that in June 2021 traffic flows on the A57 were approximately 91% of pre-pandemic levels. The peak hour traffic flows obtained from the 2021 survey have therefore been uplifted by 9% to provide baseline traffic flows reflecting pre-pandemic levels.

To account for the traffic survey being undertaken in a non-neutral month, (due to Covid and timing issues), ATC data obtained from WBC has been reviewed to determine an appropriate factor to convert the July AM and PM peak hour flows to neutral month flows.

For comparison and validation purposes, ATC data has also been obtained from WBC for a site on the A57 (near its junction with Weir Lane) and a site on Woolston Grange Avenue. The data obtained from these sites is for a 2 week period for a neutral month (October 2019) and non-neutral month (July 2019).

Calculations are based on the average weekday AM and PM peak hour flows for the 2 weeks' worth of data provided for each month. The AM peak hour was 8am to 9am and the PM Peak hour was 5pm to 6pm.

For the A57, the average peak hour uplift factor is calculated to be 1.043 (or 4.3%).

For Woolston Grange Avenue, the average peak hour uplift is calculated to be 1.073 (or 7.3%).

From the above, the average uplift factor on the local highway network for the peak hours is calculated to be 1.058 (or 5.8%) and has been used to provide an adjustment to reflect neutral month flows.

4.2 Committed Development Flows

WBC has confirmed that there are no committed developments in the vicinity of the development site that will have a material impact on the operation of the A57 junctions.

The Council indicated it may be prudent to consider potential impacts from the Six 56 application (20149/34799) and the potential for residential development in Hollins Green and Lymm as outlined in the Local Plan evidence base.

The distribution detailed in the Six 56 Warrington – Environmental Statement - Traffic and Transport Technical Paper 2 shows no traffic increases at the A57 / M6 J21 roundabouts, or on the A57.

A review of the potential residential development in the evidence base indicates that there will be up to 430 units in Lymm and 90 units in Hollins Green. Looking at the locations of the proposed housing in Lymm, it is apparent that only a very small percentage of generated traffic would realistically use the A57 and the M6 J21 as part of a journey. An element of the proposed housing at Hollins Green could be anticipated to use the A57 and M6 J21, but given the small number of houses proposed, the traffic generation would be minor and undetectable within the daily variation in flow at the A57 / M6 J21 junction.

Based on the above, for the purpose of this preliminary assessment TEMPRO growth factors have been used to expand the adjusted background traffic to the 2037 assessment year. Although current TEMPRO growth factors do not contain proposals which may be in the emerging Local Plan, the review of the evidence base demonstrates that it will provide a robust proxy of future demand for the purposes of this assessment. Noting that a Transport Assessment supporting a future planning application would need to make use of the forecasts within the Warrington Traffic Model.

The calculated TEMPRO factors are as follows:

- AM Peak 2021 – 2037: 1.1175 (11.75%)
- PM Peak 2021 – 2037: 1.1135 (11.35%)

WBC and NH have confirmed that the use of the TEMPRO growth factors is acceptable for the purpose of this assessment.

5 Development Proposals

5.1 Trip Rates and Traffic Generation

In discussions regarding the formulation of trip rates for the proposed development, WBC and NH indicated that, in their opinion, generic trip rates derived from the TRICS database underestimate potential traffic generation from industrial and logistics land uses. Sweco was therefore directed to review the Six 56 planning application which is similar in characteristic to the development under consideration.

The Six 56 Transport Assessment utilised trip rates derived from a traffic count on Lockheed Road in Omega North. The trip rates derived have been previously reviewed and agreed by WBC and NH as part of the Six 56 planning application. As both Authorities have accepted the Omega North trip rates, it was agreed that they will be adopted for this preliminary assessment as they are higher than a profile which would be generated from TRICS and will therefore provide the greatest traffic generation quantum and hence a robust assessment of potential traffic impact.

This preliminary assessment is based upon a development scenario comprising a development quantum of 115,920 sqm (GFA). The Framework Masterplan is enclosed as **Appendix E**.

The agreed trip rates and resulting trip totals for the A57 development site are summarised in **Table 5.1** below.

| | AM Peak Hour | | | PM Peak Hour | | |
|---|--------------|---------|---------|--------------|---------|---------|
| | Arrivals | Departs | Two way | Arrivals | Departs | Two way |
| Trip Rates | | | | | | |
| Trip rate per 100sqm (GFA) – Total vehs | 0.1301 | 0.0734 | 0.2035 | 0.0837 | 0.1453 | 0.229 |
| Trip rate per 100sqm (GFA) - LGVs | 0.1041 | 0.0480 | 0.1521 | 0.0430 | 0.1089 | 0.1519 |
| Trip rate per 100sqm (GFA) – HGVs | 0.0261 | 0.0254 | 0.0514 | 0.0407 | 0.0364 | 0.0771 |
| Trip Totals A57 West Development Area | | | | | | |
| A57 West – All vehicles | 44 | 25 | 69 | 28 | 49 | 77 |
| A57 West - LGVs | 35 | 16 | 51 | 15 | 37 | 51 |
| A57 West - HGVs | 9 | 9 | 17 | 14 | 12 | 26 |
| Trip Totals A57 East Development Area | | | | | | |
| A57 East – All vehicles | 90 | 51 | 141 | 58 | 100 | 158 |
| A57 East – LGVs | 72 | 33 | 105 | 30 | 75 | 105 |
| A57 East – HGVs | 18 | 18 | 36 | 28 | 25 | 53 |
| Trip Totals A57 South Development Area | | | | | | |
| A57 South – All vehicles | 17 | 10 | 27 | 11 | 19 | 30 |
| A57 South – LGVs | 14 | 6 | 20 | 6 | 14 | 20 |
| A57 South – HGVs | 3 | 3 | 7 | 5 | 5 | 10 |
| Trip Totals Full Development Area | | | | | | |
| Full Dev – All vehicles | 151 | 85 | 236 | 97 | 168 | 265 |
| Full Dev – LGVs | 121 | 56 | 176 | 50 | 126 | 176 |
| Full Dev – HGVs | 30 | 29 | 60 | 47 | 42 | 89 |

Table 5.1: Trip Rates and Resulting Trip Totals

5.2 Multi-Modal Trips

Mode split data has been sourced from the 2011 Census – Location of Usual Residence and Location of Place of Work, by method of travel to work (WU03EW) data for Warrington.

The development site is located in Middle Super Output Area (MSOA) Warrington 014. This has been used as the ‘place of work’ when gathering information on the method of travel to work. All MSOAs in Warrington and the majority of areas within the North West were considered in the calculations as the origins for the journey to work.

The existing mode split derived for the area and the estimated multi-modal trips for Travel to Work is summarised in **Table 5.2** below.

| Mode | Mode Share | AM Peak | | PM Peak | |
|------------------|-------------|------------|-----------|-----------|------------|
| | | Arrival | Departure | Arrival | Departure |
| Public Transport | 5% | 8 | 4 | 3 | 9 |
| Vehicles | 74% | 121 | 56 | 50 | 126 |
| Passenger | 10% | 16 | 8 | 7 | 17 |
| Cycle | 6% | 10 | 5 | 4 | 10 |
| Walking | 5% | 8 | 4 | 3 | 9 |
| Other | 0% | 0 | 0 | 0 | 0 |
| Total | 100% | 163 | 75 | 67 | 171 |

Table 5.2 – Estimated multi-modal trip generation (Travel to Work)

The census data reveals that the public transport mode share in the area is low. The development of the site can be anticipated to result in an increased demand for public transport, which suggests that the development could act as a catalyst for improving the existing bus services and frequency on the A57 corridor, particularly at peak times.

The walking and cycling mode share in the area is also currently low, but will be expected to rise with development and appropriate walking and cycling infrastructure will be provided on the A57 frontage and within the site, with connections provided to the wider footpath / PRoW and cycle networks.

In contrast, the vehicle mode share is high, however this is not unexpected given the close proximity to the M6 and wider motorway network and the current limited public transport, walking and cycling provision. The data also suggests that approximately 90% of car trips are single occupancy journeys.

Given the above statistics, the development will provide an excellent opportunity to improve the existing bus, pedestrian and cycle infrastructure and to promote sustainable transport to future occupiers through a robust Travel Plan.

5.3 Trip Distribution

For LGV (staff traffic), a trip distribution pattern has been derived from 2011 journey to work data for MSOA E02002603: Warrington 014. This covers the area to the west of

the M62 and contains the Grange Industrial Estate, which provides a good proxy for the development site. The agreed distribution is as follows:

To/from:

- M6(N): 40%
- M6(S): 17.9%
- A57(W): 22.9%
- Woolston Grange Avenue: 14.5%
- A57(E): 4.7%

Given the nature and composition of the traffic likely to be generated by the proposed industrial and logistics land-uses and the close proximity of the site to M6 J21, the trip totals for HGV traffic (only) summarised in **Table 5.1** will be distributed at the site accesses on the A57 as 90% to the west and 10% to the east.

5.4 Assessment Scenarios

For the purpose of this preliminary study examining access options to the development site from the A57, the assessment scenario will comprise traffic forecasts for a future year of 2037 (Base and Base + Development) representing the full Local Plan period advised by WBC (although it is noted that the latest evidence base suggests 2038).

Given the early stage of the development proposal there is no indication of a likely opening year (assuming full build out and occupation) at the time of writing. This will be a scenario in the Transport Assessment to be prepared in support of a future planning application.

An assessment of the likely traffic impacts which could arise during the construction phase of the development is not relevant to this preliminary assessment.

5.5 Access Strategy

An access strategy option from the A57 has been identified and comprises a 4-arm roundabout serving the development land west of Brook Lane (north and south of the A57) and a ghost island priority junction serving the land east of Brook Lane. Appropriate emergency services and PT access would also be provided.

The 4-arm roundabout will be located approximately 280m east of the M6 J21 dumb-bell roundabout to maximise the developable areas to the north of the A57 (west land parcel).

It is anticipated that the A57 (west) between the existing M6 J21 roundabout and the proposed access roundabout would be upgraded to dual carriageway standard. This reflects the existing design of the dumb-bell roundabout junction with the A57, the scale of the development proposed, and the heavy bias of development generated traffic to / from the M6.

The A57 (east) arm of the roundabout would have a single lane approach flaring to two lanes on entry to the roundabout and a two lane exit from the roundabout merging

to a single lane to the east. It would be realigned to facilitate the provision of appropriate forward visibility.

Two lanes would be provided through the roundabout for A57 traffic in both directions to maximise capacity for through traffic.

The development access arms of the roundabout (north and south of the A57) would have a single lane approach flaring to two lanes at the roundabout entry and a single lane exit from the roundabout.

The ghost island priority junction will be located east of Brook Lane, opposite Moss Side Farm, to serve the land east of Brook Lane and will be designed to appropriate standards.

It would be beneficial in highway design and road safety terms to reduce the speed limit on the A57 from 50mph to 40mph. This has been raised with WBC and the Council has indicated it has no objections 'in principle'.

6 A57 / Site Access Junctions: Preliminary Assessments

The operational assessment of the proposed access arrangements has been undertaken using modelling software TRANSYT 15 as agreed.

The assessment assumes that traffic flows from the development land east of Brook Lane will access via the proposed ghost island priority junction, with all development traffic for the land west of Brook Lane utilising the roundabout access.

The forecast traffic flows derived for the operational assessment (2037 + Development) are shown in **Figure 6.1**.

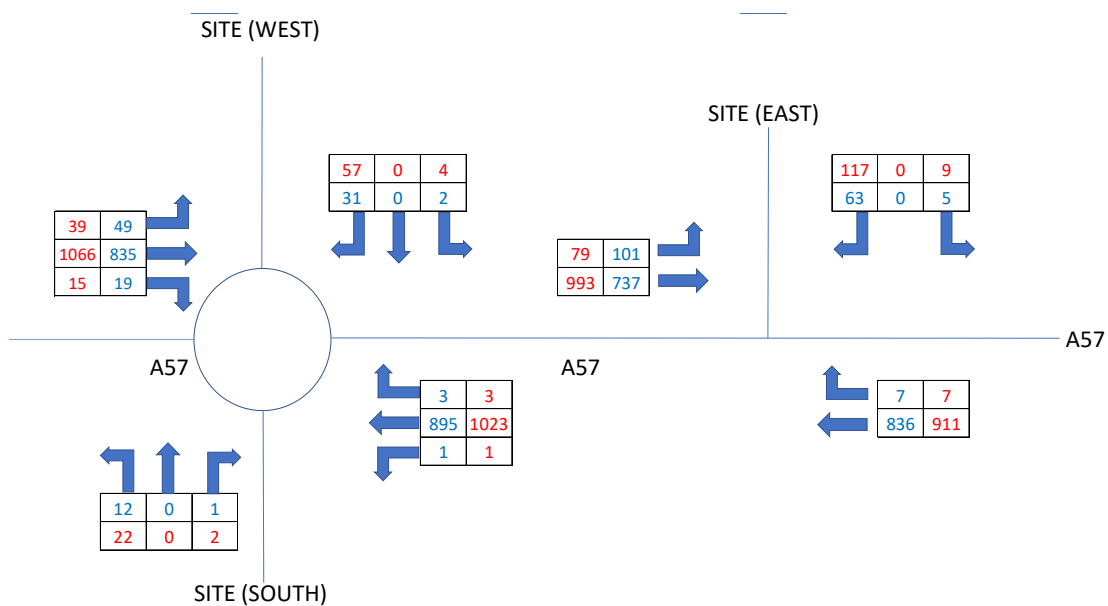


Figure 6.1: 2037 + Development flows (Blue AM Peak / Red PM Peak)

The model results are summarised in **Table 6.1**.

| Arm | Name | AM Peak | | | PM Peak | | |
|---|--|---------|--------------|-----------|---------|--------------|-----------|
| | | DoS (%) | PRC (%) | MMQ (PCU) | DoS (%) | PRC (%) | MMQ (PCU) |
| Roundabout | | | | | | | |
| SiteA 1 | A57 East approach | 45 | 99 | 0.19 | 51 | 75 | 0.27 |
| SiteA 2 | A57 East Lane 1 at roundabout | 42 | 115 | 0.72 | 47 | 92 | 0.88 |
| SiteA 2 | A57 East Lane 2 at roundabout | 46 | 97 | 0.84 | 54 | 68 | 1.14 |
| SiteB 1 | Site Access South approach | 0 | 17900 | 0 | 1 | 8082 | 0 |
| SiteB 2 | Site access South Lane 1 at roundabout | 1 | 16018 | 0.01 | 1 | 5984 | 0.01 |
| SiteB 2 | Site access South Lane 2 at roundabout | 1 | 10645 | 0.01 | 2 | 4970 | 0.02 |
| SiteC | A57 mid (EB) Lane 1 | 42 | 117 | 0.71 | 50 | 78 | 1.01 |
| SiteC | A57 mid (EB) Lane 2 | 25 | 257 | 0.34 | 36 | 150 | 0.56 |
| SiteD 1 | Site access North approach | 2 | 5706 | 0 | 3 | 2713 | 0 |
| SiteD 2 | Site Access North Lane 1 at roundabout | 1 | 6173 | 0.01 | 4 | 2335 | 0.04 |
| SiteD 2 | Site Access North Lane 2 at roundabout | 2 | 5066 | 0.02 | 3 | 2492 | 0.04 |
| Ghost island priority junction | | | | | | | |
| 2Site A1 | A57 from east approach | 42 | 114 | 0.15 | 46 | 97 | 0.19 |
| 2Site A2 | A57 East ahead lane | 0 | Unrestricted | 0 | 0 | Unrestricted | 0 |
| 2Site A2 | A57 East right turn lane | 1 | 6808 | 0.01 | 1 | 5956 | 0.02 |
| 2Site B1 | East Site egress | 26 | 249 | 0.34 | 64 | 41 | 1.64 |
| 2Site C1 | A57 from West | 36 | 148 | 0.1 | 49 | 85 | 0.23 |
| DoS – Degree of saturation. >85% capacity issues & significant delays will be experienced. PRC – Practical Reserve Capacity. MMQ – Mean Maximum Queue experienced over the model period (60 mins). Measured in passenger car units (1pcu = 5.75m) | | | | | | | |

Table 6.1: 2037 Base + Development model results summary

The results in Table 6.1 show both the roundabout and priority junction would operate with no capacity issues.

6.1 Sensitivity Assessment

In addition to the assessment of the operational performance of the two junctions, a sensitivity test has also been undertaken with all development traffic only using the 4-arm roundabout as the access to all development land parcels. The forecast traffic flows derived for the sensitivity assessment (2037 + Development) are shown in Figure 6.2.

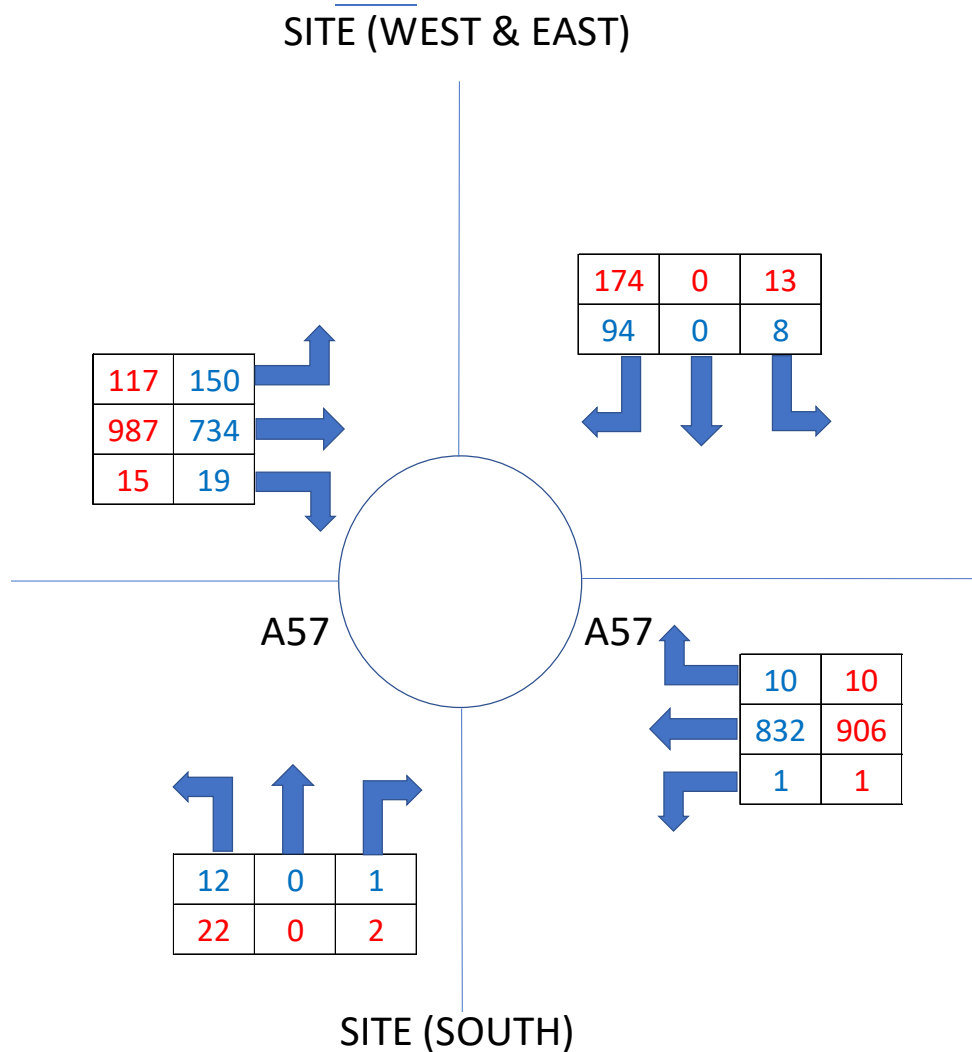


Figure 6.2: Sensitivity assessment 2037 Base + Development flows (Blue AM Peak / Red PM Peak)

The model results are summarised in **Table 6.2**.

| Arm | Name | AM Peak | | | PM Peak | | |
|--------|--|---------|---------|-----------|---------|---------|-----------|
| | | DoS (%) | PRC (%) | MMQ (PCU) | DoS (%) | PRC (%) | MMQ (PCU) |
| SiteA1 | A57 East approach | 42 | 114 | 0.15 | 46 | 97 | 0.19 |
| SiteA2 | A57 East Lane 1 at roundabout | 42 | 116 | 0.71 | 46 | 95 | 0.85 |
| SiteA2 | A57 East Lane 2 at roundabout | 42 | 116 | 0.71 | 46 | 95 | 0.85 |
| SiteB1 | Site Access South approach | 0 | 17900 | 0 | 1 | 8082 | 0 |
| SiteB2 | Site access South Lane 1 at roundabout | 1 | 15725 | 0.01 | 2 | 5817 | 0.02 |
| SiteB2 | Site access South Lane 2 at roundabout | 1 | 10450 | 0.01 | 2 | 4831 | 0.02 |
| SiteC | A57 mid (EB) Lane 1 | 45 | 100 | 0.81 | 53 | 69 | 1.13 |
| SiteC | A57 mid (EB) Lane 2 | 22 | 306 | 0.28 | 34 | 167 | 0.51 |
| SiteD1 | Site access North approach | 5 | 1665 | 0 | 9 | 857 | 0 |
| SiteD2 | Site Access North Lane 1 at roundabout | 5 | 1687 | 0.05 | 10 | 782 | 0.11 |
| SiteD2 | Site Access North Lane 2 at roundabout | 5 | 1687 | 0.05 | 10 | 782 | 0.11 |

DoS – Degree of saturation. >90% capacity issues & significant delays will be experienced.
 PRC – Practical Reserve Capacity.
 MMQ – Mean Maximum Queue experienced over the model period (60 mins). Measured in passenger car units (1pcu = 5.75m)

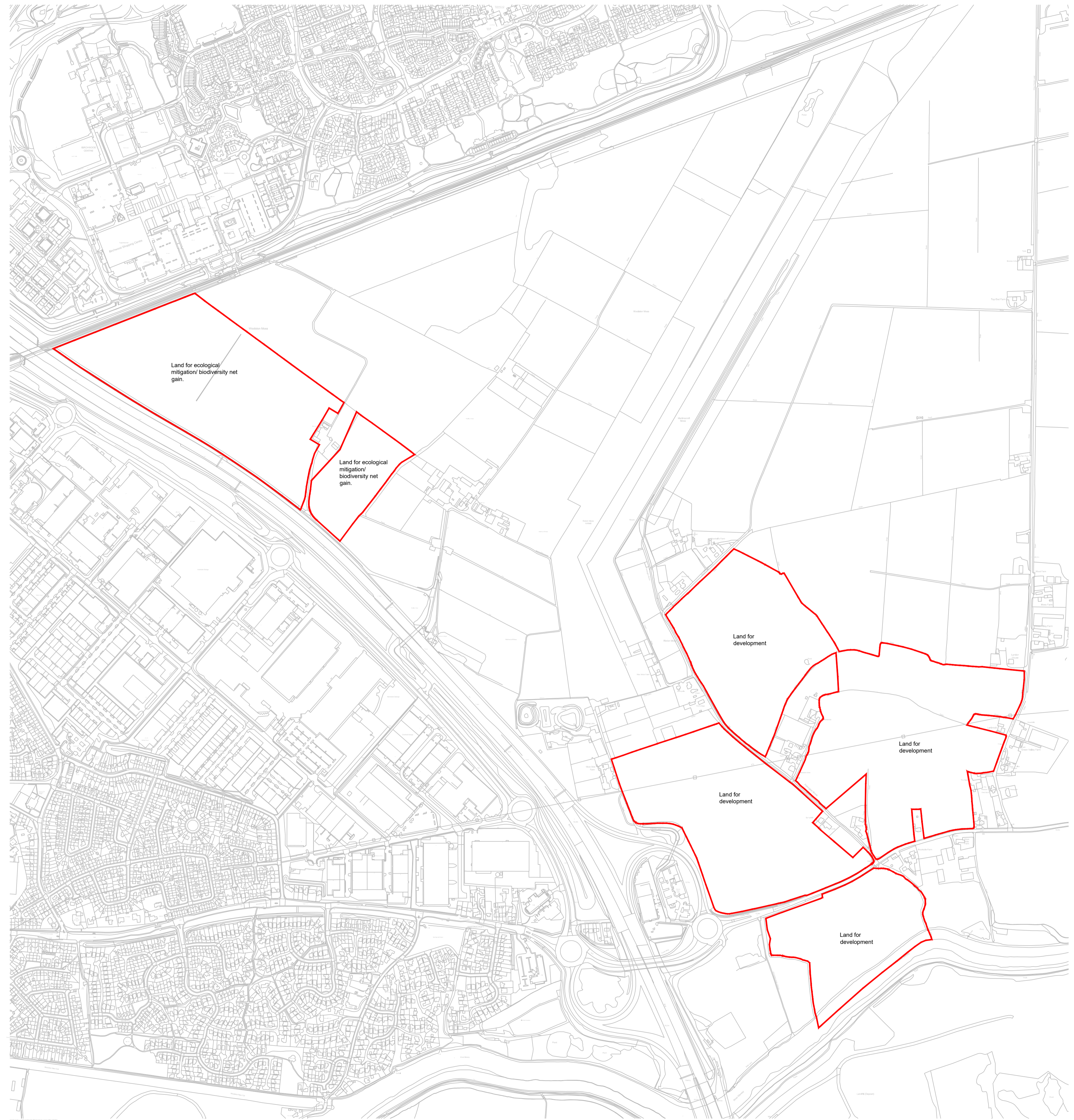
Table 6.2: Sensitivity assessment 2037 Base + Development model results summary

The results in Table 6.2 show that the proposed roundabout as a single junction access is expected to operate within capacity in 2037 (with development) and is suitable to accommodate the traffic flows generated from all of the development land without having an unacceptable impact on the operation of the A57.

6.2 Assessment Summary

The results of the preliminary operational assessment indicates that the access strategy is appropriate to provide access to the development site from the A57 for the anticipated land-uses and quantum of development proposed. There is therefore a deliverable access strategy which accords with the requirements for acceptability on highway grounds set-out in the NPPF.

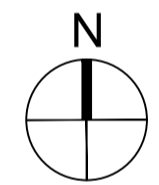
Appendix A – Development Site Land Parcels



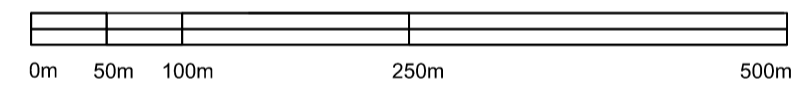
Contractors are not to scale dimensions from this drawing

Key

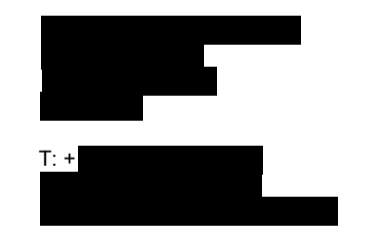
— Sharpe's Land
Option Boundary



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Project
BIRCHWOOD

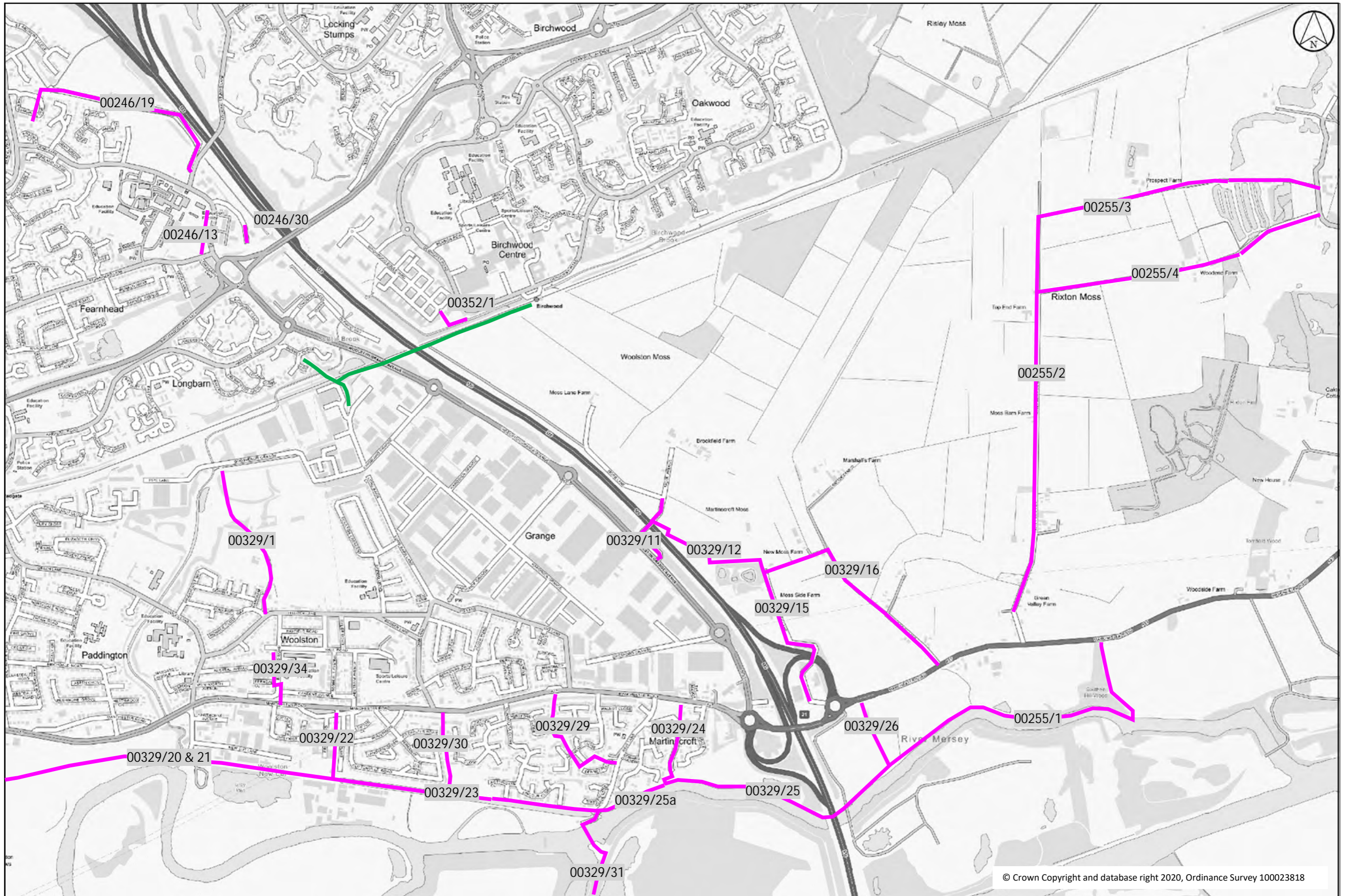
Description
SHARPE'S LAND OPTION PLAN

Status
DRAFT

| | | |
|------------|----------------|----------|
| Scale | Drawn | Date |
| 1:5000@A1 | BM | NOV 20 |
| Job number | Drawing number | Revision |
| 34799 | 210-2 | B |

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Appendix B – Public Right of Way Map



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Key — Footpaths — Shared Pedestrian/Cycleway

Appendix C – Warrington Cycle Map



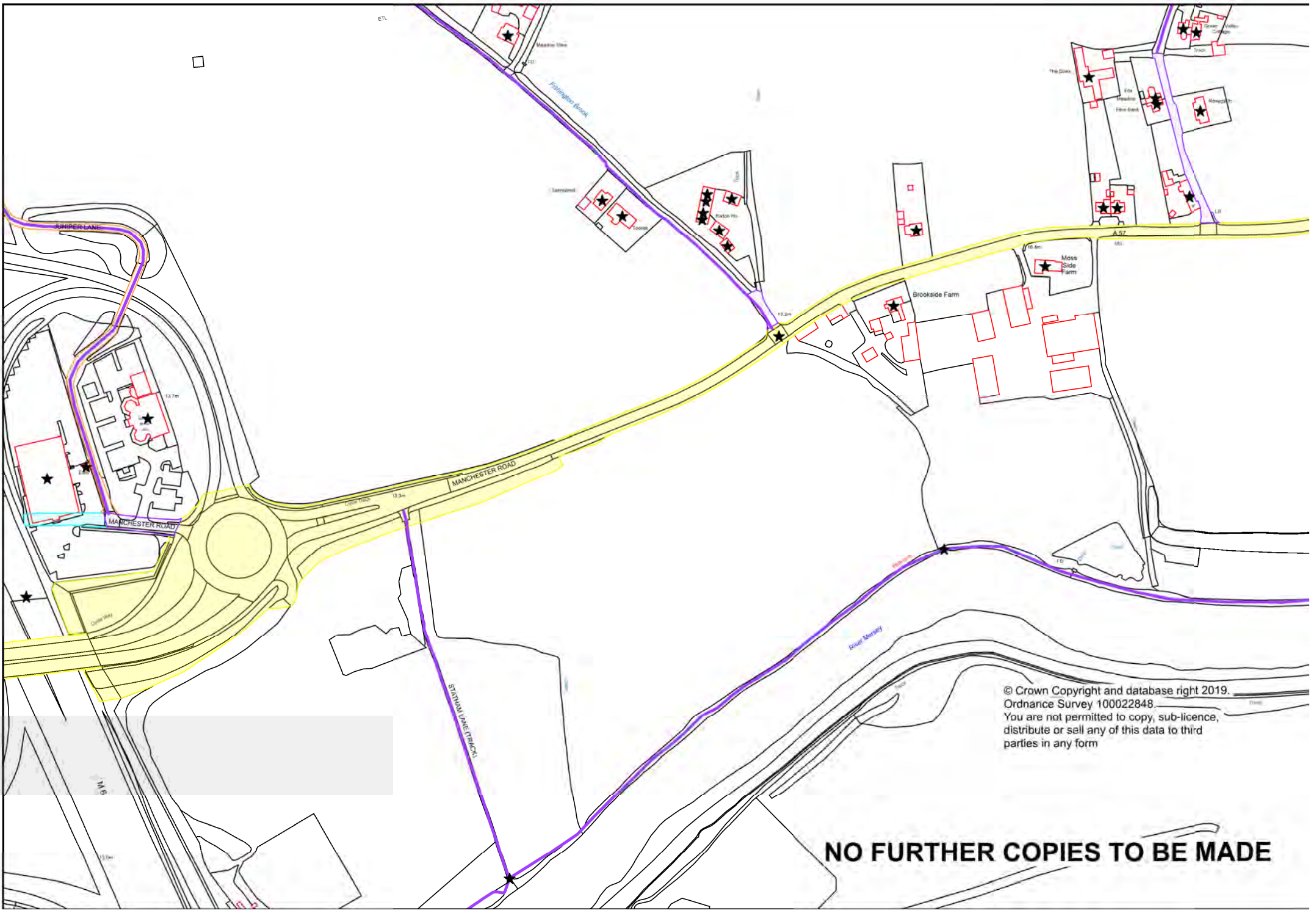
Key

Cycleability gradations, in increasing experience

| | | | |
|---|---|---|---|
| 1 | 2 | 3 | 4 |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

| | | | |
|--|---|--|---------------------|
| | National Cycle Network route number & Trans-Pennine Trail | | Bike shop |
| | Railway station | | Bridge |
| | Bus interchange | | Pedestrian crossing |
| | Schools | | Toucan crossing |
| | Colleges | | Underpass |
| | Hospital | | Wheeling ramp |
| | Library | | |
| | Supermarket | | |
| | Cycle parking | | |

Appendix D – Adopted Highway Data



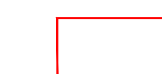










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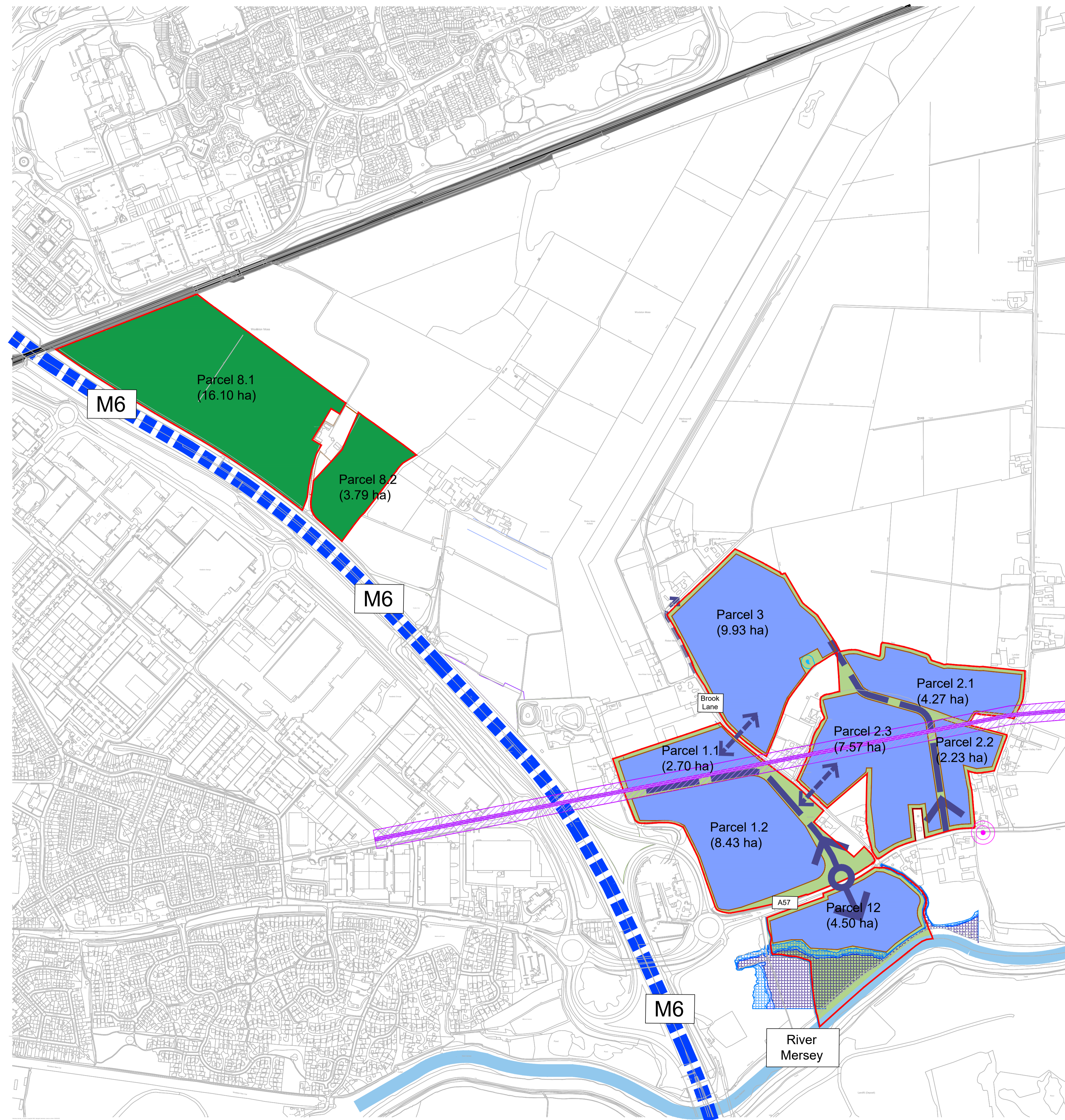
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Appendix E – Framework Masterplan

Contractors are not to scale dimensions from this drawing

Key

-  Site Boundary
-  I&L
-  Open space
-  Primary access(18.8m width)
-  Opportunity for link across Brook Lane
-  Land for potential ecological mitigation
-  Overhead power line and easement -22.5m(TBC)
-  Flood Risk 1:100 yr (Lidar)
-  Flood Risk 1:200 yr (Lidar)
-  Flood Risk 1:1000 yr (Lidar)
-  Listed milestone on A57



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Warrington M6 J21

Description
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Status
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| 1:5000@A1 | BM | October '21 |
| Job number | Drawing number | Revision |
| 34799 | 03-200 | C |

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APPENDIX C
LAND USE BUDGET

Birchwood Employment Masterplan
Land use budget

Ref: 34799-03-WP-SH-001
 Revision: A DRAFT FOR COMMENT Note: Totals Exclude parcel 12
 Revision: B UPDATED AS LATEST OPTION 01.11.21
 Revision: C UPDATED AS LATEST OPTION 02.11.21
 Revision: D Site coverage amended as advised 09.11.21

| Use | Gross area (ha.) | Acres |
|--|------------------|---------------|
| Industrial and Logistics | 40.25 | 99.42 |
| Noise Buffer zone (could count/ partially count towards OS target subject to agreement with LPA) | 6.45 | 15.93 |
| Possible ecological mitigation | 19.89 | 49.13 |
| Remaining open space and other infrastructure | 4.97 | 12.28 |
| Total Site Area | 71.56 | 176.75 |

Estimated

| PARCEL | USE | Gross area (ha) | Gross area (acres) | SUDS @ 4% (ha.) TBC | Total to be netted out per parcel (ha.) | Net Developable Area (ha.) | Industrial and Logistics | | |
|--------|---------------------------------------|-----------------|--------------------|---------------------|---|----------------------------|---------------------------|------------------|-------------------|
| | | | | | | | Site coverage @ 30% (ha.) | Floorspace (sqm) | Floorspace (sqft) |
| 1.1 | Industrial and Logistics | 2.70 | 6.67 | 0.11 | 0.11 | 2.59 | 0.78 | 7,776 | 83,700 |
| 1.2 | Industrial and Logistics | 8.43 | 20.82 | 0.34 | 0.34 | 8.09 | 2.43 | 24,278 | 261,330 |
| 1.3 | Industrial and Logistics | 0.58 | 1.43 | 0.02 | 0.02 | 0.56 | 0.17 | 1,670 | 17,980 |
| 2.1 | Industrial and Logistics | 4.27 | 10.55 | 0.17 | 0.17 | 4.10 | 1.23 | 12,298 | 132,370 |
| 2.2 | Industrial and Logistics | 2.23 | 5.51 | 0.09 | 0.09 | 2.14 | 0.64 | 6,422 | 69,130 |
| 2.3 | Industrial and Logistics | 7.57 | 18.70 | 0.30 | 0.30 | 7.27 | 2.18 | 21,802 | 234,670 |
| 3 | Industrial and Logistics | 9.93 | 24.53 | 0.40 | 0.40 | 9.53 | 2.86 | 28,598 | 307,830 |
| 12 | Industrial and Logistics | 4.54 | 11.21 | 0.18 | 0.18 | 4.36 | 1.31 | 13,075 | 140,740 |
| | Total Industrial and Logistics | 40.25 | 99.42 | | 1.61 | 38.64 | 11.59 | 115,920 | 1,247,751 |
| 8.1 | Possible ecological mitigation | 16.10 | 39.77 | | | | | | |
| 8.2 | Possible ecological mitigation | 3.79 | 9.36 | | | | | | |
| | Total Ecological mitigation | 19.89 | 49.13 | | 0.00 | 19.89 | | | |



APPENDIX D
EMPLOYMENT NEEDS
ASSESSMENT

J21 Birchwood, Warrington

Employment Needs Assessment

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Executive Summary

Subject Site



J21 Birchwood (the Subject Site) is located within the Borough of Warrington and comprises 71.56 ha of land. It is situated to the south of Birchwood train station on the east-west rail line between Liverpool and Manchester. The M6 motorway runs along the western boundary of the site, with Junction 21 of the motorway leading to the A57, Manchester Road, which provides access to the Site.

The vision for the Subject Site is to deliver 40.25 (gross) ha of Industrial & Logistics (I&L) employment land. Despite its potential to support Warrington’s economic growth

ambitions and housing delivery targets, the Subject Site is currently not proposed for allocation in the Updated Proposed Submission Version Local Plan (UPSVP) (2021).

Advice from Savills’ industrial agents indicates I&L uses typically want to be within a 2-hour drive time of their end customers and suppliers. 22 million people (13.8 million of working age) and 793,000 businesses are within 2 hours drive time of the Subject Site. This represents around a third of England & Wales resident and business populations, clearly indicating how accessible the site is.

Report Purpose & Approach

This report provides an evidence based overview of the potential for new I&L development at the Subject Site, having regard to current and future market supply and demand dynamics in Warrington and the wider Functional Economic Market Area (FEMA). The report findings demonstrate that Warrington’s future I&L land needs far exceed its existing and planned employment land supply, with a **shortfall totalling 195.49 ha over the plan period to 2038**. The assumptions behind this conclusion are tabulated below.

| | EDNA (2021) | Savills |
|--|------------------------|-----------|
| I&L Future Demand (2021 – 2038) | 242.26 ha ¹ | 494.62 ha |

¹ WBC EDNA (2021) – Table 22 (E(g)(iii), B2, B8, Mixed)

| | | |
|--|---------------------------------------|--|
| Existing Supply plus St Helens Omega Extension | 61.21 ha | 61.21 ha |
| Proposed Allocations (South East Warrington Employment Area and Fiddlers Ferry) | 237.92 ha | 237.92 ha |
| Future Need (Supply minus Future Demand) | +56.87 ha (positive / surplus) | -195.49 ha (negative / shortfall) |

The 40.25 ha of I&L land proposed at Junction 21 Birchwood (Subject Site) will contribute to reducing Savills estimated shortfall over the plan period. For this reason we recommend the Subject Site be allocated within the new Local Plan.

As we discuss in **Section 7**, we only consider approximately half of the employment allocation within Fiddlers Ferry to be deliverable within the Plan Period. This increases the size of the Savills shortfall to **246.49 ha** meaning further sites will also need to be allocated, in addition to the Subject Site, to meet future I&L demand. In any event the need for additional development is still substantial even if all of the Fiddlers Ferry development came forward in the Plan period.

The steps we followed to reach these conclusions are as follows:

1) Review WBC's Evidence Base

Our review of WBC's 2021 EDNA has found a number of **deficiencies** in the way future needs have been assessed, namely:

- **The Look-back Period is Too Long**: the look-back period over which average take-up (demand) is calculated runs for 24 years from 1996 to 2020. This is far too long a period over which the demand drivers underpinning I&L need, and the characteristics of the sector itself, have changed significantly. For example, the last decade has seen a significant increase in online shopping from 2.8% in 2006 to 19.1% in February to 2020. The Covid-19 pandemic has accelerated this trend further with online shopping currently sitting at 25.9% of all retail sales (September 2021). Growth in online retailing has a direct impact on I&L demand as going online requires 3 times the amount of warehouse floorspace compared to traditional bricks & mortar shops. Such a long look back period also dampens the impact of other, more recent, growth drivers for I&L demand such as increasing UK freight volumes, UK companies bringing their operations back to the UK to avoid Brexit related supply chain shocks and continued business and housing growth in Warrington and the wider FEMA. Finally the inclusion of the Global Financial Crisis (GFC) in the 24 year look back period also undercuts historic demand as this resulted in a systematic impact to the entire UK economy. In the years immediately following the GFC,

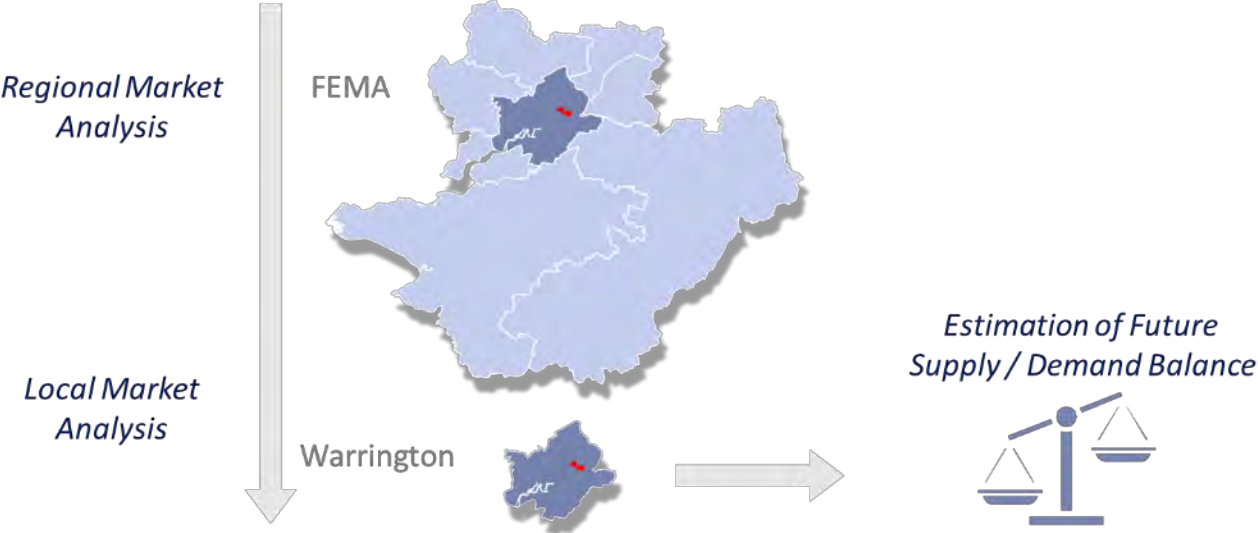
I&L demand in WBC was negative (-91,411 sq.ft net absorption per annum) vs 638,000 sqft of net absorption per annum since 2012.

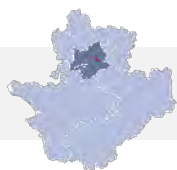
- **EDNA uses Completions rather than Net Absorption:** the EDNA's measure of take-up is based on completion trends rather than actual take-up of floorspace – what Savills refer to as net absorption. Development completions are a supply measure, not a demand measure. For new development (completions) to come forward new employment sites need to be allocated, and planning permission granted before new floorspace can be built. The length of time and complexities involved is why supply measures (completions) typically lag actual demand (net absorption). Therefore the use of a lagging supply factor, and projecting this forward into the future, results in an underestimate of true need based on actual market demand.
- **EDNA doesn't account for suppressed demand:** when supply, as signalled by floorspace availability, is low, demand is suppressed as prospective tenants can't find space in a market. By merely projecting forward historic take-up, the EDNA has taken no account of demand that has been lost due to supply constraints and therefore presents a need profile based on a supply constrained trend (or 'suppressed demand'). Since 2015, I&L availability has been a downward trajectory and has now dropped below the 9% equilibrium rate we consider for Warrington to indicate a balance between supply and demand. The rest of the FEMA has been below the 9% equilibrium rate since 2014 demonstrating, as a whole, the entire FEMA has been supply constrained for much of the last decade.

2) Update WBC's Evidence Base

The Savills methodology for estimating future demand is considered more realistic than the EDNA as it attempts to understand true demand rather than merely project forward historic trends that have been suppressed by historic supply constraints. To update the EDNA's I&L land need estimates, we first consider regional demand and supply indicators for all districts that make up Warrington's FEMA. This is followed by a more detailed analysis of Warrington's local I&L market. We then review Warrington's available I&L employment land (future supply) and estimate future I&L needs (demand).

This process is shown graphically below followed by a summary of the regional and local market analysis.





Regional Market Analysis

The analysis of regional supply and demand factors indicates that the FEMA's I&L market is strong. Warrington is one of the largest I&L markets in the FEMA in terms of total inventory and on average it has attracted the highest investment in the net delivery of new I&L stock (averaging 437,000 sqft per annum since 2011). Warrington has also experienced some of the strongest rental growth in the FEMA over the last decade (73.5%) and has the highest average market rent (£7.48/sqft). In terms of net absorption, it has averaged 529,000 sqft per annum since 2011, the highest in the FEMA.

This analysis clearly indicates Warrington's important position in the FEMA, but also that the FEMA itself has a strong I&L market totalling 162 million sqft of inventory and attracting around 1.4 million sqft of net deliveries I&L per year.

| | Total Inventory sqft | Avg. Net Absorption sqft p.a. (2011 21) | Avg. Net Deliveries sqft p.a. (2011 21) |
|------------------------------------|----------------------|---|---|
| Warrington | 23,104,847 | 460,943 | 436,952 |
| Cheshire East | 23,268,383 | 481,386 | 192,514 |
| Cheshire West & Chester | 20,275,638 | 238,034 | 112,939 |
| Halton | 14,634,654 | 340,760 | 174,637 |
| Salford | 18,466,323 | 98,775 | 59,189 |
| St Helens | 15,096,762 | 316,491 | 230,916 |
| Trafford | 25,929,605 | 204,554 | 81,829 |
| Wigan | 21,449,353 | 253,505 | 95,732 |
| FEMA | 162,225,565 | 2,502,509 | 1,384,708 |

From the regional analysis we conclude that the Subject Site will experience strong regional demand for I&L uses.



Local Market Analysis

The majority (79%) of Warrington's I&L demand has been for large properties of 100,000 sqft and above. Net absorption for mid box units (30,000 sqft to 100,000 sqft) was relatively low accounting for about 4% of total demand. Demand for smaller units of less than 30,000 sqft accounted for 8% of demand.

Net Absorption by Size Band, 2011-2021



In terms of future I&L demand, we estimate a need of 15.97 million sqft over the 18-year Plan period. This estimate is derived by projecting forward historic take-up over the plan period (9.53 million sqft), accounting for suppressed demand in years where the market was supply constrained (420,293 sqft), adjusting for current and future increases in online retail (3.25 million sq.ft), adding a 3-year buffer to provide a continuum of supply beyond the end of the plan period and to account for the current day I&L growth drivers (2.2 million sqft), and allowing for business displacement associated with Warrington Masterplan projects (570,000 sqft). At a 30% plot ratio (which is justified in **Section 6.3**) this 15.97 million sqft of floorspace need equates to **495.62 ha** of land. This is considerably higher than the future I&L demand estimated by the EDNA (2021) at **242.26 ha**.

Current I&L supply totals 299.13 ha. This is made up of proposed new employment allocations, existing land supply and land within the Borough of St. Helens secured to count towards Warrington's land supply via Duty to Co-operate discussions. Subtracting the Supply from Savills estimated Future Demand we find a **shortfall totalling 195.49 ha over the plan period**.

As a result we believe additional I&L sites need to be allocated in the UPSVLP (2021). Based on our review in **Section 7** we consider the Subject Site to be an ideal candidate for allocation to help address our calculated shortfall. This is due to its prime location on the M6 and limited infrastructure requirements given it benefits from direct access to Junction 21 of the M6 via Manchester Road (A57).

Economic Benefits & Social Value

The Proposed Development is estimated to generate a number of economic benefits and social value as summarised below.

ECONOMIC BENEFITS

| Construction Jobs | Operational Jobs | Net Additional GVA (p.a.) |
|--------------------------|-------------------------|----------------------------------|
| 171 | 1,457 | £97.1 million |

Estimated on-site and off-site jobs expected to be generated per annum over the 7 year construction period for WBC residents

Estimated on-site and off-site jobs expected to be generated by the Proposed Development for WBC residents

Estimated net additional GVA (Gross Value Added) expected to be generated per annum from on-site jobs (taking into account displacement)

| Private Income (p.a.) | Business Rates (p.a.) |
|------------------------------|------------------------------|
| £53.2 million | £1.2 million |

Estimated private income expected to be generated per annum for on-site workers

Estimated business rates for WBC (assuming 49% retention) expected to be generated by Proposed Development

SOCIAL VALUE

| Apprenticeships | Construction Careers Information, Advice & Guidance Events | NHS Savings from Unemployment Reduction |
|------------------------|---|--|
| £115,200 | £30,000 | £186,800 |

Estimated social value of apprenticeships (11) delivered during the construction period (7 years)

Estimated total social value of Construction Careers Information, Advice & Guidance Events (6 events)

Estimated NHS savings assuming that expenditure on unemployed persons is double the average NHS expenditure during the construction period (7 years)²

| Qualifying the Workforce | Supporting Local Businesses | Total Social Value |
|---------------------------------|------------------------------------|---------------------------|
| £310,600 | £30.4 million | £31 million |

Estimated total social value of Qualifications achieved (equiv. NVQ2 or above)

Estimated total value of local procurement during the construction period assuming 20% of all monies spent locally³

Industry Trends

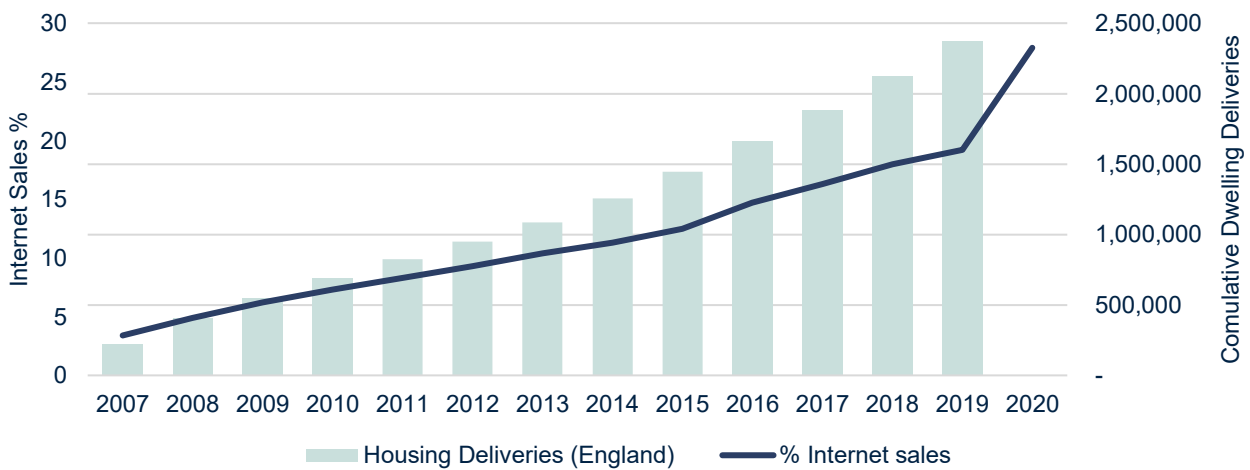
² Based on Oxford Economics Cost-benefit analysis for the Department for Work and Pensions (2010).

³ WBC Planning Obligations SPD (2017)

The UK economy and the way we live our lives has significantly changed over the last twenty years, supporting the long-term growth of the I&L sector.

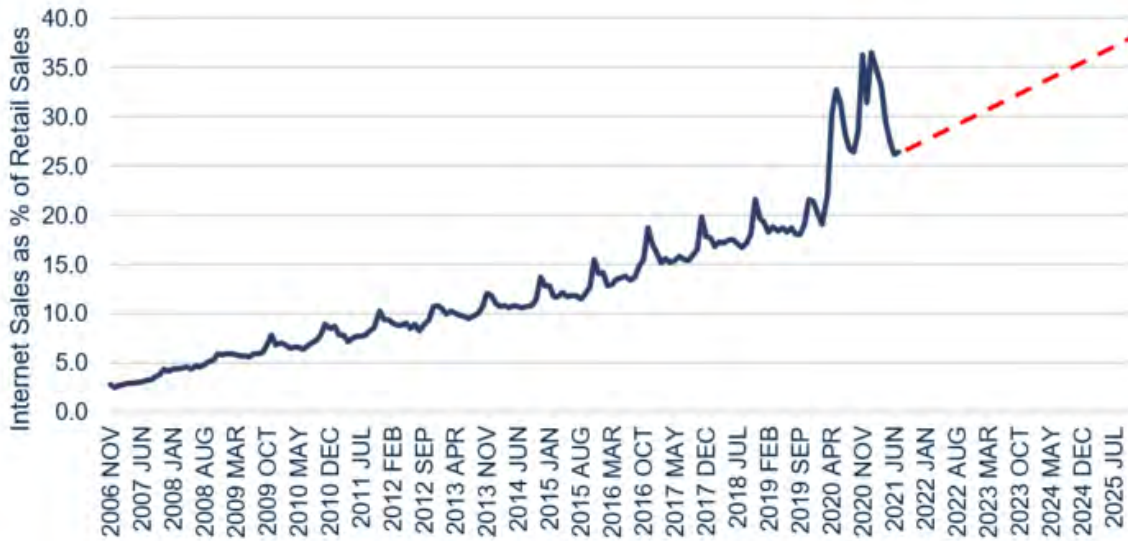
Population Growth & Consumption

The growth in I&L demand has been supported by increases in population, as there is a direct link between population growth and household consumption. Housing growth at the national level has broadly tracked the growth in online retailing before the onset of the Covid-19 pandemic, during which time online retailing has spiked even higher. The Government’s current housing target is for 300,000 homes per annum in England.



Online Shopping

The growth in online shopping has significant implications on future I&L demand given that e-commerce requires around 3 times the logistics space of traditional brick-and-mortar retailers. While the proportion of online retailing may soften slightly as the UK economy opens up, most commentators agree that online retailing will continue to grow from a higher base than before the pandemic due to behavioural changes such as increased home working and continued demand for rapid parcel deliveries.

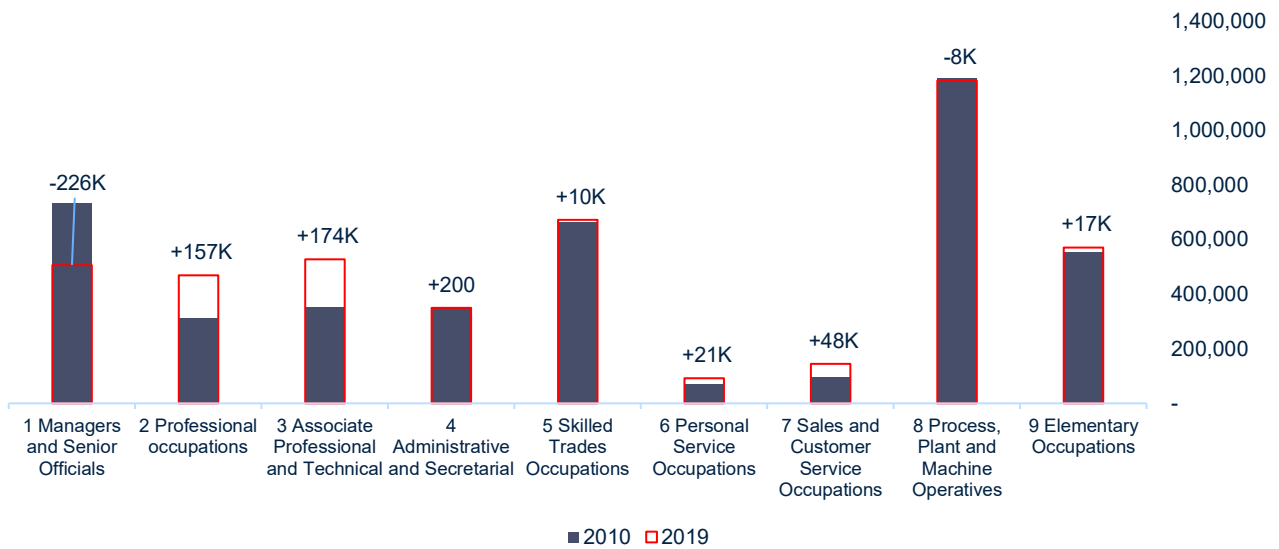


UK Freight

Freight volumes are another key growth driver of I&L floorspace need. Freight arriving and leaving the UK needs to be sorted, packaged and distributed via a network of freight handling infrastructure (i.e. ports, freight handling airports, rail freight interchanges and motorways) and conveniently located I&L premises in order to reach end customers. Freight volumes have increased over the last 10 years at major ports (by 16.2%) and airports (by 32.6%) located within a 2 hour drive time of the Junction 21 Birchwood site.

Changing Nature of Jobs

The I&L industry is also changing with a more diverse range of occupations. New technologies have significantly impacted the sector, transforming the way tasks are performed and businesses operate. While the beginning of the decade saw a more polarised distribution, with a higher share of managers at one end of the spectrum and more routine occupations at the other end, we now see a higher share of Professional and Associate Professional and Technical roles, which can be both associated with high-skilled engineering and technological professions.



Near-shoring and on-shoring

Covid-19 has also highlighted the level of interconnectedness of international supply chains and their fragility when one or more links break. Companies have started building up greater resilience in their operating models by moving operations either back to the UK or closer by as a means to minimise future supply-chain-induced disruptions. If, in the short term, companies adopt nearshoring policies to insulate themselves from future supply chain disruption, it is likely that European manufacturing will increase which in turn will create a ripple effect for warehouse demand. Brexit is also likely to add uncertainty surrounding the strength of supply chains, influencing the need for further logistics and industrial space. Certain I&L activities may be re-shored to the UK as it becomes more expensive to conduct business in the EU.

In **Appendix A** we discuss these and other trends that are shaping growth in the I&L sector and which we have summarised in the graphic below. Overall, we expect these trends to increase future demand for I&L floorspace above the historic level.



1 Introduction

1.1 Purpose

- 1.1.1 This report provides an evidence based overview of the market potential for new industrial & logistics (I&L) development at J21 M6 Birchwood (the Subject Site), having regard to current and future market supply and demand dynamics in Warrington and the wider region.
- 1.1.2 Warrington Borough Council (WBC) is currently in the process of preparing a new Local Plan, covering the period 2021 to 2038. The aim of this report is to assess the Council's employment land evidence base to demonstrate if the Subject Site could be justified for employment allocation as part of WBC's current Local Plan review.
- 1.1.3 The 'Warrington Means Business' regeneration programme and in the Cheshire and Warrington Local Enterprise Partnership's (LEP) Strategic Economic Plan (SEP) demonstrated that Warrington has ambitious economic growth plans but also a strong existing economic base to support this growth. Warrington is home to the largest cluster of nuclear research and technology firms in the UK, employing over 5,000 people at Birchwood Park, a designated Enterprise Zone. Warrington also has major employment clusters in Logistics, Precision Engineering, Energy, Telecoms and Software, and Business Services.
- 1.1.4 As noted in the Proposed Submission Version Local Plan (2021), there is strong market interest for I&L development in locations linked to the main motorway junctions such as Birchwood, where the Subject Site is located. The Subject Site is exceptionally well placed to cater to the strong market interest from I&L occupiers in this location. It boasts great accessibility thanks to J21 on the M6, a key requirement for I&L occupiers, enabling access to a wider potential customer base within a reasonable drive time. Its 40.25 ha of employment land ensures scale, needed for the successful establishment of a new significant employment location in the east of the Borough. It is also supported by a potential pool of labour, being adjacent to the existing Birchwood and Woolston settlements.
- 1.1.5 With this report, we demonstrate that based on recent market evidence, future I&L employment land needs of Warrington far exceed its existing and planned employment land supply, with a **shortfall totalling 195.49 ha** over the plan period. The Subject Site will contribute to reducing Savills estimated shortfall of I&L land need for Warrington. Therefore we recommend the Subject Site be allocated within the new Local Plan.

1.2 Report Structure

- 1.2.1 The report is structured as follows:
- **Section 2** introduces the Subject Site and considers its attractiveness for I&L development;
 - **Section 3** reviews the existing evidence base contained in the EDNA 2021 and provides Savills observations on the deficiencies of the chosen future land needs methodology;
 - **Section 4** provides a regional market assessment for I&L uses within the wider Functional Economic Market Area (FEMA);
 - **Section 5** assesses the local market at Warrington borough level for I&L uses;

- **Section 6** explains Savills methodology for the estimation of future I&L land needs for Warrington and how this compares with current and future land supply;
- **Section 7** undertakes a review of WBC's existing I&L land supply and assesses the Subject Site against the EDNA's other options for employment allocations to help determine with sites should be included within the new Local Plan;
- **Section 8** presents estimates of the economic benefits and social value expected to be generated from the Proposed Development; and
- **Section 9** details the report's final recommendations.

1.3 Reader Note

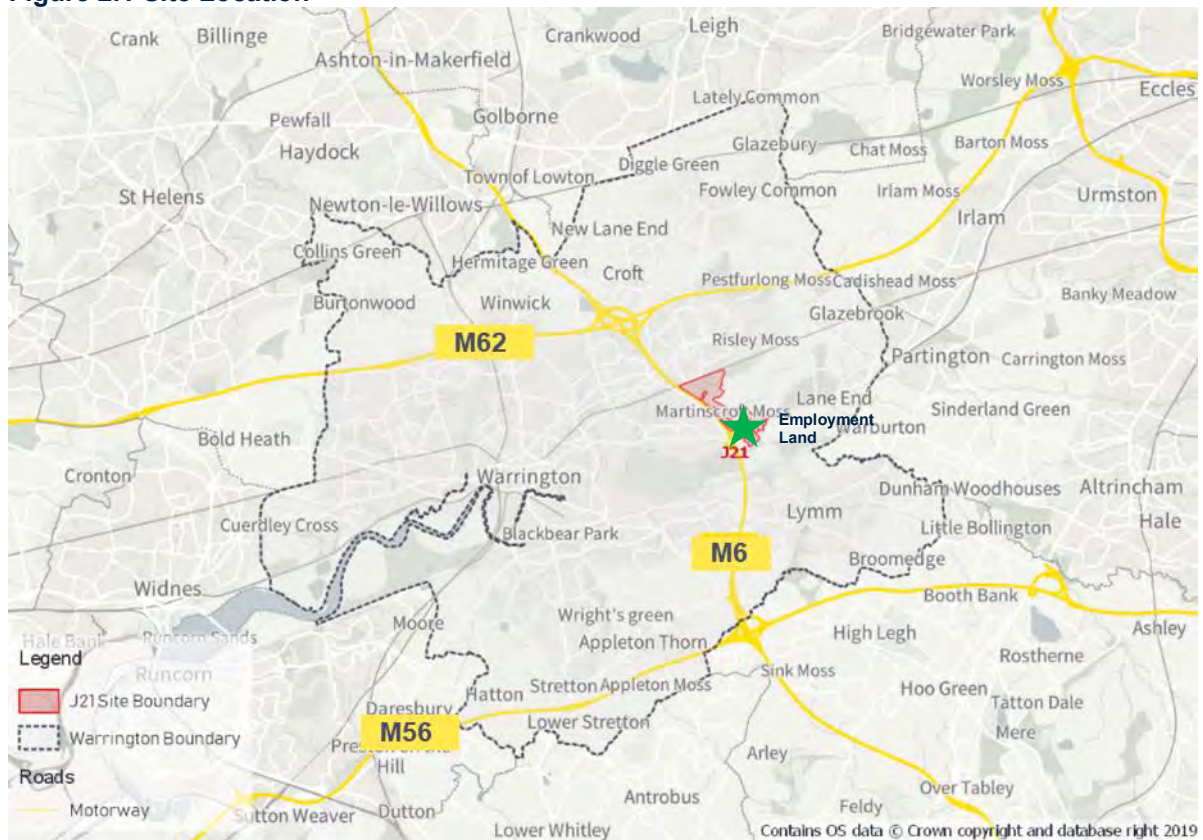
- 1.3.1 When we refer to the industrial and logistics (I&L) sector we mean Light Industrial (formally B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require shed-type units (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

2 Project Description

2.1 Site Location

2.1.1 The Subject Site comprises around 120 ha of land. It is situated to the south of Birchwood train station on the east-west mainline railway between Liverpool and Manchester. As shown in **Figure 2.1**, the M6 motorway runs along the western boundary of the site, with Junction 21 of the motorway leading to the A57, Manchester Road, forming the southern site boundary. Open farmland is found to the east.

Figure 2.1 Site Location

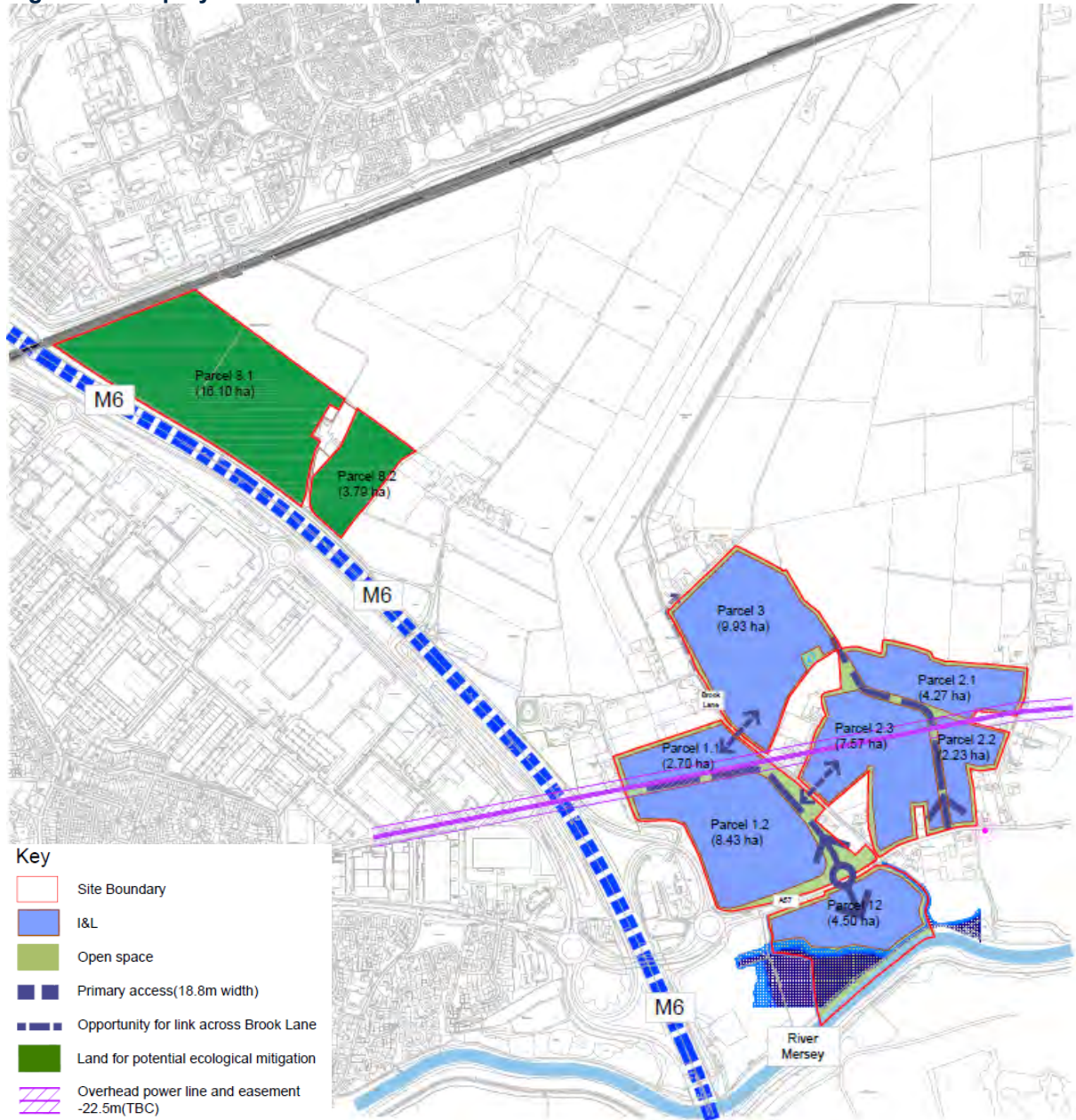


Source: Savills

2.2 Development Vision

2.2.1 The current Birchwood Employment Masterplan comprises 71.56 ha of land, with the employment area (40.25 ha) in the southern portion of the site to capitalise on accessibility to the M6 via J21. The remaining 31.31 ha is for a noise buffer zone, possible ecological mitigation and open space and other infrastructure. This is shown in **Figure 2.2** below.

Figure 2.2 Employment Land Masterplan



Source: St Modwen Birchwood Employment Masterplan

2.3 Strategic Advantages

2.3.1 The Subject Site has considerable location and deliverability advantages over other employment sites proposed for allocation in the Local Plan. The following attributes (**Figure 2.3**) are considered to be key for prospective I&L occupiers: large site area to accommodate a variety of unit sizes, a level site, 24-hour access, motorway/A-road access, end customer and supplier access, access to workforce and access to intermodal facilities. Below, we demonstrate how the Subject Site possesses these key attributes attractive to I&L occupiers.

Figure 2.3 The attributes of a good I&L site



Source: Savills 2021

- 2.3.2 The Subject Site allocates 40.25 ha for I&L uses, and will therefore be able to accommodate a greater variety of unit sizes and therefore a more diverse mix of smaller local companies alongside mid-size and larger regional and national businesses. Companies generally prefer to be co-located with other companies as they can benefit from supply chain linkages and other agglomeration benefits such as knowledge spill overs between firms, sharing the costs of estate wide maintenance and security for instance.
- 2.3.3 The Subject Site is level and so can enable unobstructed access by service vehicles, forklifts and for some company's automated system that assist with sorting and packaging processes. The Site will also benefit from 24-hour access, which is becoming an increasingly important requirement due to the continuing rise in online retailing (discussed in **Section 3 and Appendix A**) and the desire of modern society for shorter delivery timeframes. Sites located close to motorways (such as the Subject Site) with a level of separation from sensitive uses are typically more likely to facilitate 24 hour operations without causing unacceptable environmental nuisance. 24 hour operations also enable longer haul journeys to be undertaken overnight to avoid daytime traffic congestion.
- 2.3.4 Its access to the M6 via J21 connects the Subject Site directly to the strategic road network (SRN). This is particularly advantageous to I&L occupiers as it enables access to a large customer base as well as suppliers.
- 2.3.5 Advice from Savills' industrial agents indicates I&L uses typically want to be within a 2-hour drive time of their end customers and suppliers. **Figure 2.4** illustrates the extent of the 2-hour drive-time catchment from the Subject Site. It shows that the Subject Site is with easy reach of large conurbations in the North of England and the Midlands including Liverpool, Manchester, Leeds, Sheffield and Birmingham. Further GIS analysis conducted on ONS Population Estimates and Business Count data at Lower Layer Super Output Areas (LSOAs) and Middle Layer Super Output Areas (MSOAs) suggests that the Subject Site is within 2-hour drive time of over 22 million people (13.8 million of working age) and 793,000 businesses. This represents around a third of England & Wales' resident and business populations at 37% and 32% respectively.
- 2.3.6 The Subject Site is also conveniently located with respect to key freight handling infrastructure including

ports, freight handling airports and Strategic Rail Freight Interchanges (SRFI).

Figure 2.4 Drive-Time Catchment of 2 Hours from the Subject Site

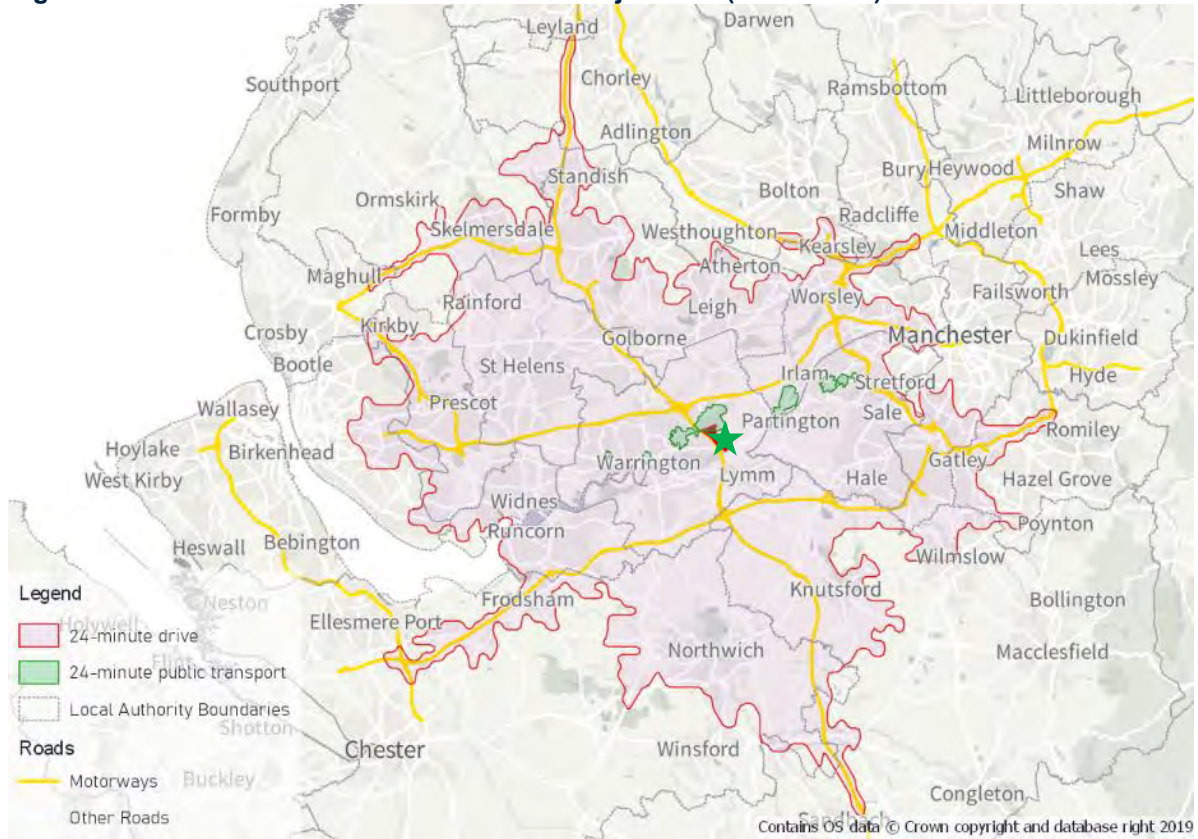


Source: Savills

2.3.7 According to statistics from ONS Labour Force Survey⁴, Warrington has an average home-to-work travel time of 24 minutes. Using GIS, **Figure 2.5**, indicates a 24-minute drive time from the Subject Site reaches 1.8 million people (1.1 million of working age).

⁴ User Request Data – 2018: TRVTME Usual home to work travel time (minutes) by local authority

Figure 2.5 Travel-time Catchments from the Subject Site (24 minutes)



Source: Savills

2.3.8 The Subject Site also has clear advantages from a deliverability perspective as the Site is under single ownership which St Modwen has a development agreement in place for.

3 Existing Evidence Base

3.1 Introduction

3.1.1 The most recent employment evidence informing the Local Plan review is the Refresh to the Economic Development Needs Assessment (August 2021) prepared by BE Group and Mickledore (henceforth referred to as the EDNA). This report is an update on the 2019 version of the EDNA.

3.1.2 In this section we summarise the key findings of this report, review the methodology used for estimating future employment land needs and provide Savills view on its findings. Our review focuses on the assessment of future demand as this is the element that, methodologically, can be performed in a number of ways even if compliant with the National Planning Policy Guidance (NPPG). The chosen methodologies, and assumptions used, can ultimately produce large variations in the supply and demand balance.

3.2 EDNA Overview

3.2.1 Reasons for the update of the EDNA from 2019 are as follows:

- To support development of the Proposed Submission Version Local Plan (PSVLP);
- To reflect a revised local plan period, 2021-2038, compared to the previously used 2017-2037;
- To reflect changes to national planning policy and guidance – National Planning Policy Framework, National Planning Policy Guidance and Use Class Order Changes;
- To reflect national issues including the exit of the United Kingdom from the European Union and the potential impacts of the Covid-19 Pandemic;
- The fact that Fiddlers Ferry Power Station will now likely become available for employment development within the Plan period, and that the site is now being actively promoted for inclusion as such in the Local Plan by the owners; and
- To ensure the Borough's economic development needs are considered in the context of the Borough's housing needs in order to provide a balanced Local Plan spatial strategy.

3.3 EDNA Needs Assessment Methodology

3.3.1 Paragraph 27 of the NPPG outlines four possible methods to estimate future demand:

- 1) sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand);
- 2) demographically derived assessments of current and future local labour supply (labour supply techniques);
- 3) analysis based on the past take-up of employment land and property and/or future property market requirements (past take-up); and
- 4) consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.

3.3.2 The EDNA uses methods one (labour demand) and three (past take-up) to estimate future demand.

EDNA Labour demand method

- 3.3.3 The **labour demand method** looks at (local) jobs growth, using economic forecasts from Oxford Economics and Cambridge Econometrics. The resulting jobs based forecast models suggest that WBC has much smaller employment land needs, with Oxford Economics forecasts indicating a need of 12.88 ha and Cambridge Econometrics forecasts indicating a need of 23.53 ha over the plan period (2021 to 2038).
- 3.3.4 It is acknowledged that these projections are “policy-off”, i.e. they do not account for any public-sector plans or strategies for growth above the baseline. “Policy-on” modelling and sensitivity testing was undertaken, producing greater shortfalls compared to the Oxford Economics “Policy-Off” model, but still below the estimates based on Past Take-Up method.
- 3.3.5 The EDNA concludes that the market assessment and a review of the historic trends in employment change and land take up suggest that the labour demand forecasts underestimate land needs significantly and therefore was not taken forward by the EDNA.

EDNA Past take-up method

- 3.3.6 This method is preferred by the EDNA.
- 3.3.7 Under the past take-up method, historic land take-up is projected forward to produce a combined strategic & local needs projection and a local-only projection. The local-only projection model excludes development at Omega, which accounted for 42% of all completions since 1996. The rationale for creating a ‘local-only’ model is that Omega is considered to be a strategic site with a market which is regional and national in scope, delivering B2 and B8 properties of an exceptional size in the local context.
- 3.3.8 Under both the strategic/local-only models, past take-up is based on a schedule of completions between 1996 and 2020 provided by the Council, which is used to derive an average of completions per annum. In this section, we discuss the strategic/local model only as it covers all completions in WBC.
- 3.3.9 The average per annum is **14.22 ha** under the strategic/local take-up model which totals 341.29 ha of completions over the 24-year historic look-back period. Projecting forward these historic trends over the 18 year Local Plan period, from 2021 to 2038, yields a need of **255.96 ha** (14.22 ha/year x 18 years) of strategic/local take-up.
- 3.3.10 A buffer of 3 years is applied on top of the estimated plan period to reflect a choice of sites by size, quality and location and to provide a continuum of supply beyond the end of the plan period. A 17.64 ha allowance is also added to account for business displacement associated with Warrington Masterplan projects. The EDNA recognises that the displaced businesses of Central Warrington, if office tenants are excluded, are almost exclusively industrial. For the purposes of the EDNA, the need these businesses generate (17.64 ha) is split evenly between E(g)(iii), B2 and B8 storage uses.
- 3.3.11 The addition of the 3 year buffer and masterplan allowance increases the land need to **316.26 ha** based on the strategic/local take-up model as shown **Table 3.1**.

Table 3.1 Summary of Employment Land Needs (All Uses)

| Strategic / Local Model | |
|-------------------------------|---------------------------|
| Historic take up | 255.96 ha (14.22 ha p.a.) |
| 3 year buffer | 42.66 ha |
| Displacement Allowance | 17.64 ha |
| Total | 316.26 ha |

Source: BE Group

- 3.3.12 Taking the preferred estimate method based on past take-up, I&L uses account for 242.26 ha⁵ of future employment land needs in WBC for the strategic/local model. We have assumed that I&L past take-up includes Classes E(g)(iii), B2, B8 and mixed. Our inclusion of mixed might therefore overestimate I&L take up as a portion might be for offices.

3.4 Savills Observations

Labour demand method

- 3.4.1 Savills agrees with the EDNA's conclusions regarding the labour demand method and it ultimately being disregarded as part of the future needs analysis. Employment forecasts often reflect the continued restructuring of the economy away from industry towards services, projecting job declines in industrial sectors. Almost inevitably, needs projections based on this method lead to underestimations, as job declines are often assumed to translate into negative demand for industrial floorspace.
- 3.4.2 Unfortunately this does not reflect the reality of growing demand in the I&L sector. Savills' Big Shed Briefing (July 2021)⁶ reported that in H1 2021 gross take-up reached 24.41 million sqft of warehouse space setting a new record, 82% above the long-term H1 average of 13.4 million sq.ft. This follows on from a record year in 2020.
- 3.4.3 In addition, the labour demand method also disregards occupational changes within the I&L sector, where more engineering roles are being created and office functions are increasingly being co-located with warehouse functions as discussed in **Appendix A**.

Past take-up method

- 3.4.4 Of the methods outlined in the NPPG, we consider the **Past Take-Up** method to be the most useful given it has a land supply focus and is based on actual market data. However this method, based on the way it has been applied in the EDNA, still has a number of deficiencies which underestimate future land needs as we discuss further below.

THE EDNA'S LOOK-BACK PERIOD IS TOO LONG

- 3.4.5 The EDNA considers past take-up over a 24 year look back period from 1996 to 2020. This is far too long a period, over which the demand drivers underpinning I&L need, and the characteristics of the sector itself, have changed significantly. These changes have resulted in increasing demand for I&L floorspace and demand. By including take-up from as far back at the 1990s and 2000s will only have

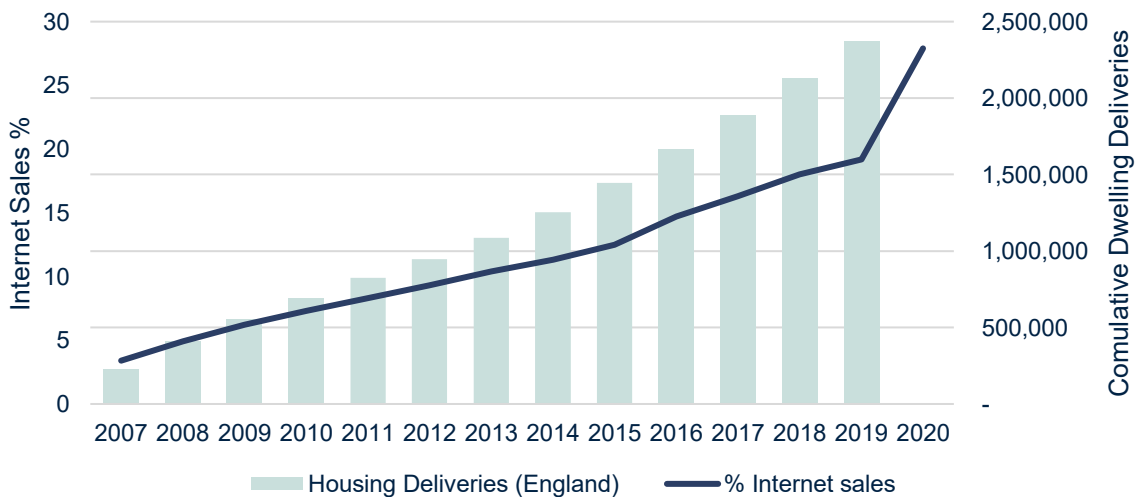
⁵ Table 22 EDNA 2021, p. 144

⁶ Savills Research (2021) Spotlight: Big Shed Briefing Available at: https://www.savills.co.uk/research_articles/229130/316116-0

served to dampen take-up.

3.4.6 For instance the exponential growth in online retail is probably the most quantifiable of the major changes driving growth in the I&L sector. Back in 1996 online retailing practically did non-exist and statistics collected by the ONS from November 2006 show that internet sales back then accounted for only 2.8% of all retail sales. This increased to 6.8% in February 2010, and was 19.1% in February 2020 before the onset of the Covid pandemic. The most recent figure is 25.9% as of September 2021⁷. This exponential growth in online retailing is both a function of the way we now live and continued housing growth in the UK. As shown in **Figure 3.1** housing growth at the national level has broadly tracked the growth in online retailing before the onset of the Covid-19 pandemic, during which time online retailing has spiked even higher. While the proportion of online retailing may soften slightly as the UK economy opens up, most commentators agree that online retailing will continue to grow from a higher base than before the pandemic. Research by Forrester indicates that internet sales will grow to 37% of all retail sales by 2025. By merely projecting forward historic take-up from the last 24 years, the strong growth in online retailing, and its impact on future demand, has not been accounted for by the EDNA.

Figure 3.1 Internet Sales as a % of all Retail Sales and Dwelling completions since 2007



Source: ONS, MHCLG, Savills

3.4.7 The increase in online shopping has profound implications on I&L floorspace demand as e-commerce requires around 3 times the logistics space compared to traditional brick-and-mortar retailers⁸. Online retailing relies on increased choice for the consumer and also increased delivery speeds to a location of people’s choosing. This means that more inventory is required to be located nearer to the general population. This in turn has meant that more and more warehouse space is required both by online retailers but also traditional bricks and mortar retailers who are adapting their supply chains to compete. Again this modern day trend will not have been accounted for in the EDNA by merely projecting forward historic take up.

3.4.8 Covid-19 has also highlighted the level of interconnectedness of existing international supply chains and

⁷ ONS (2021) Internet sales as a percentage of total retail sales (ratio) (%)

⁸ Prologis (2016), Global E-Commerce Impact on Logistics Real Estate. Online Article: <https://www.prologis.com/about/logistics-industry-research/global-e-commerce-impact-logistics-real-estate>

their fragility when one or more links break. Companies have started building up greater resilience in their operating models and are preparing to minimise future supply-chain-induced disruptions. This is expected to accelerate near-shoring⁹ or re-shoring¹⁰ trends, which 20% of firms are planning to do or have already started, according to a survey carried out in July 2020 by the Institute for Supply Management.¹¹ This is likely to lead to higher domestic inventory requirements, further increasing long-term demand for warehousing and logistics space. Surveys carried out by Savills also suggest that it is widely expected that Covid-19 will 'Somewhat Increase' supply-chain on-shoring.¹²

3.4.9 Brexit is likely to add further uncertainty surrounding the strength of the supply chains, influencing the need for further logistics space. If, in the short term, companies adopt nearshoring policies to insulate themselves from future supply chain disruption, it is likely that European manufacturing will increase which in turn will create a ripple effect for warehouse demand. The additional requirements to import and export goods could lead to significant delays in Southern ports in the UK, and freight could potentially be redirected through Northern airports and harbours with spare capacity.¹³ This would put pressure on local logistics space markets and require the development of more floorspace in those areas, and more generally along transport routes. The impacts of Brexit and increased levels of re-shoring and near-shoring will not have been accounted for in the historic take up figured projected forward in the EDNA.

3.4.10 Freight volumes are another key growth driver of I&L floorspace need. Freight arriving and leaving the UK needs to be sorted, packaged and distributed via a network of freight handling infrastructure (i.e. ports, freight handling airports, rail freight interchanges and motorways) and conveniently located I&L premises in order to reach end customers. Savills Industrial Agents advise industrial occupiers ideally have a 2hr drive time supply chain. The Junction 21 Birchwood site is within 2hrs drive of the following major ports, major airports and strategic rail freight interchanges not to mention directly adjacent to the M6:

Ports

- Manchester
- Liverpool
- Kingston upon Hull
- Holyhead
- Heysham
- Goole

Airports

- Manchester
- Liverpool
- Birmingham
- Doncaster

- East Midlands
- Humberside International

SRFI

- East Midlands Interchange
- East Midlands Intermodal Park
- West Midlands Interchange
- Hinckley National Rail Freight Interchange
- Daventry International Rail Freight Terminal

⁹ 'Near-shoring' concerns transferring a business operations to a nearby country as opposed to a more distant one (i.e. off-shoring)

¹⁰ 'Re-shoring' means Moving a business that had gone overseas back to the country from which it had originally relocated

¹¹ ISM (2020), COVID-19 Survey Round 3: Supply Chain Disruptions Continue Globally. Online Article: <https://www.ismworld.org/supply-management-news-and-reports/news-publications/releases/2020/covid-19-survey-round-3-supply-chain-disruptions-continue-globally/>

¹² Savills (2020) The impact of Covid-19 on Real Estate. Online Article: <https://www.savills.com/impacts/market-trends/the-impact-of-covid-19-on-real-estate.html>

¹³ Duncan T. (2019), Brexit Effects on Logistics. Online Article: <https://www.propertyweek.com/insight/brexit-effect-on-logistics/5105162.article>

- 3.4.11 For the major ports located within a 2 hour drive time of the Junction 21 Birchwood site, freight volumes have increased by 16.2% between 2009 and 2019, from nearly 53 million tonnes to just over 62.5 million tonnes. Furthermore, air freight for the major airports located within a 2 hour drive time from the Subject Site has increased by 32.6% over the same 10 year period from just under 372,000 tonnes in 2009 to just under 493,000 tonnes in 2019. Again the increase in freight volumes will not have been accounted for in the 24-year look back period projected forward in the EDNA.
- 3.4.12 Finally, the 24-year look-back period also covers the Global Financial Crisis (GFC), a demand shock that was felt throughout the entire world economy and took years to recover from. For instance **Table 3.2** shows net absorption has been much higher since 2012 in both the FEMA and Warrington than during the GFC (2009 - 2011). This clearly shows the damping factor the GFC had on I&L demand and ultimately the EDNA's forward projections by including it within its 24-year look back period¹⁴.

Table 3.2 Net Absorption p.a. (2009-2011; 2012-2021)

| | Ave. Net Absorption p.a. (2009 2011) During GFC | | Ave. Net Absorption p.a. (2012 2021) post GFC |
|------------|--|--|--|
| Warrington | -94,411 | | 638,142 |
| FEMA | 1,246,846 | | 2,749,083 |

Source: Savills (2021); CoStar (2021)

- 3.4.13 We therefore consider the 24-year look-back period in the EDNA too long as it doesn't reflect more recent market conditions and the strength of I&L demand. We consider a 10-year period as appropriate to capture more recent market dynamics.

COMPLETIONS VS NET ABSORPTION

- 3.4.14 The EDNA's measure of take-up is based on past completion trends (what Savills refer to as new deliveries), rather than actual take-up of floorspace space (what Savills refer to as net absorption).
- 3.4.15 The leading demand measure of floorspace is "net absorption", which indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on leasing deals. Development completions on the other hand is a supply measure (rather than a demand measure) which calculates new floorspace delivered. While new floorspace can be delivered on existing sites through redevelopment and intensification, it mainly depends on new employment sites being made available (allocated) for development via the planning system. For this reason, historic net absorption is a more accurate reflection of need than historic completions.
- 3.4.16 As shown in **Table 3.3** below, the EDNA's use of development completions instead of net absorption as a measure of demand has led to an underestimate of Warrington's future employment land needs. As can be seen net absorption is higher regardless of the length of the look back period. It is not uncommon for market demand (net absorption / leasing deals) to be higher than supply based measures (take-up / completion) given the complexities and length of time it can take to allocate employment land through the Local Plan process, achieve planning permission and then build new I&L premises.

¹⁴ Data used for the period during the GFC is from 2009 to 2011 as CoStar's historic data is only available from 2009 onwards

Table 3.3 I&L Annual Take-up Comparison

| | EDNA Completions (1996 2020) | CoStar Completions (2011 2021)* | CoStar Net Absorption (2011 2021)* |
|--|---------------------------------|------------------------------------|--|
| Annual | 14.22 ha | 14.42 ha | 16.40 ha |
| Over 24 years | 341.29 ha | 346.16 ha | 393.60 ha |
| Difference from EDNA estimates (24 years) | | | + 52.31 ha |

Source: BE Group EDNA, CoStar, Savills

*Note: floorspace to land conversion based on a 30% plot ratio (this is justified in **Section 6.3**)

THE EDNA DOESN'T ACCOUNT FOR SUPPRESSED DEMAND

- 3.4.17 When supply, as signalled by floorspace availability, is low, demand is suppressed as prospective tenants can't find space in a market. 8% is typically referred to as the equilibrium level at a national level when supply and demand are broadly in balance (as sourced in publications such as the GLA's Land for Industry and Transport SPG (2012).
- 3.4.18 Below this level available supply becomes tight and rents increase as strong occupier demand compete for limited available stocks. While we accept 8% as a reasonable equilibrium benchmark it can be higher or lower based on the size and strength of a specific market. For instance strong, fast paced markets with considerable churn may require a higher than 8% equilibrium benchmark, while the opposite is true for smaller markets with less churn. The process for estimating a market's equilibrium rate is to investigate at what availability level (historically) have corresponded with minimal real rental growth (net of inflation). This is based on the commonly held logic that rental growth is minimal when there is sufficient supply to meet demand – in effect supply and demand is in balance. We undertake this process in **Section 6** which indicates the equilibrium rate for Warrington's I&L market is 9%. Warrington's availability rate is currently well below its equilibrium, sitting at 5.4%, which we discuss further in **Section 5**.
- 3.4.19 By merely projecting forward historic take-up, the EDNA has taken no account of demand that has been lost from Warrington and the wider FEMA due to supply constraints and therefore presents a need profile based on a supply constrained trend (or 'suppressed demand').
- 3.4.20 Savills have developed a methodology that estimates a market's suppressed demand when supply is below an equilibrium rate (i.e. when supply and demand are in balance). This can be added to historic demand projections to give a more realistic picture of future demand.
- 3.4.21 In **Section 6** we provide more details on the method to estimate suppressed demand specific to Warrington and its FEMA.

4 Regional Market Assessment

4.1 Introduction

- 4.1.1 This section compares Warrington's I&L markets against the other districts in the FEMA across a number of supply and demand indicators.
- 4.1.2 The regional context is important given that future I&L investors and occupiers will consider the attractiveness of the Subject Site against other competing locations within the FEMA. New I&L investment and occupier demand will naturally flow to the strongest locations.
- 4.1.3 **Table 4.1** lists the market supply and demand factors we consider.

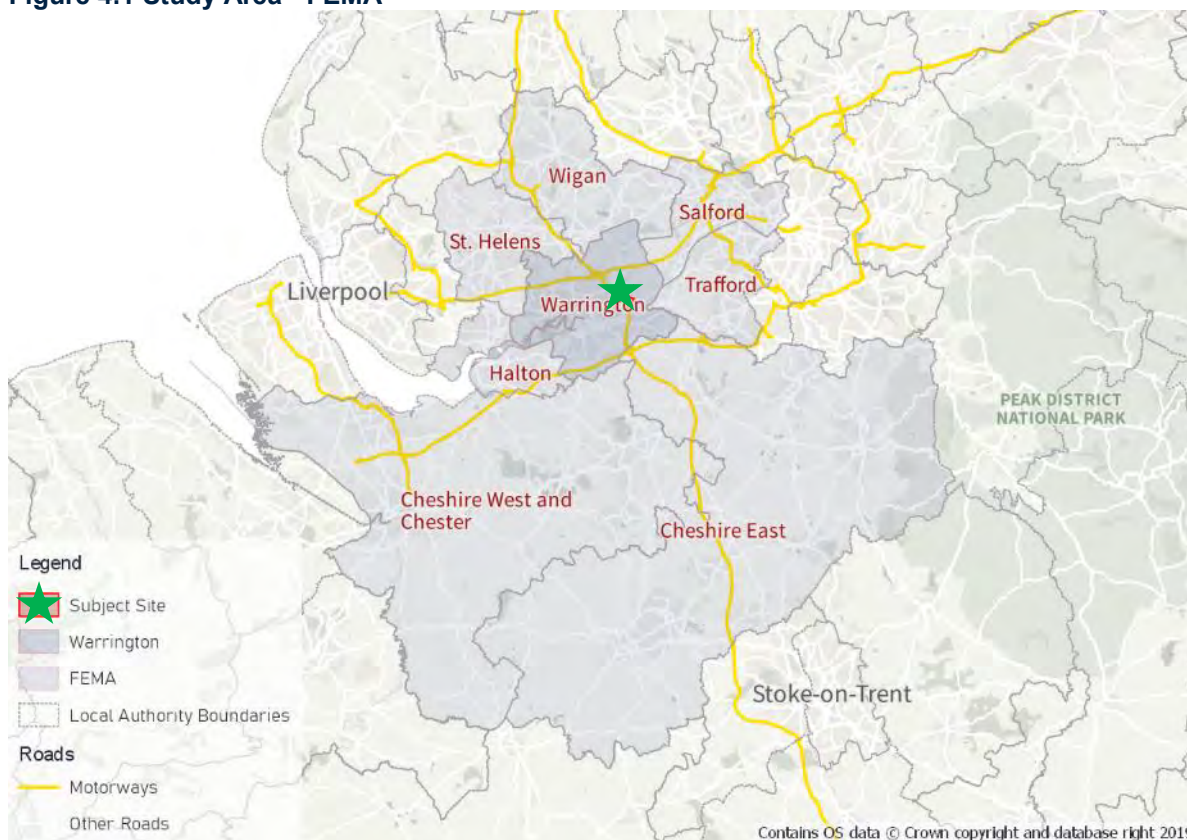
Table 4.1 Market Factors Considered

| Supply Factors | Demand Factors |
|---|---|
| <ul style="list-style-type: none"> • Total inventory • Availability • Vacancy • Quality of existing stock • Floorspace to working-age population ratio • New developments | <ul style="list-style-type: none"> • Net absorption • Average market rents • Rental growth |

4.2 Property Market Area

- 4.2.1 Before undertaking the market supply and demand assessment, we must first define the Property Market Area (PMA) within which the Subject Site is located.
- 4.2.2 Warrington is part of a wider Functional Economic Market Area (FEMA) that includes neighbouring local authorities. FEMA's are essentially a group of local authorities that share similar characteristics in terms of key economic drivers, housing markets and workforce and consumer flows. Warrington's FEMA is based on a best-fit geography as discussed in the EDNA (2021). It includes the local authorities of -
- Warrington
 - Cheshire East
 - Cheshire West and Chester
 - Halton
 - Salford
 - St Helens
 - Trafford
 - Wigan
- 4.2.3 Savills consider this FEMA to be a sensible PMA within which to consider the I&L market at the wider sub-regional level, as well as the individual local authorities within it.

Figure 4.1 Study Area - FEMA



Source: Savills

4.3 Market Supply Factors

- 4.3.1 **Table 4.2** presents a summary of the supply indicators for the respective I&L market across the FEMA.
- 4.3.2 Warrington has the third largest inventory of I&L stock in the FEMA (23.1 million sqft), after Trafford and Cheshire East, accounting for 14.2% of the FEMA's total inventory.
- 4.3.3 As discussed in **Section 3**, we consider 9% availability to represent when Warrington and the wider FEMA is in balance between I&L supply and demand. Below this level available supply becomes tight and rents increase as strong occupier demand compete for limited available stock. The FEMA's overall availability rate is currently 3.8%, indicating that the area is currently supply-constrained as this rate is well below the 9% equilibrium rate, and the FEMA's availability rate has been consistently below 9% since 2014.
- 4.3.4 A key impact of this is that demand can be suppressed due to the lack of available stock thereby restricting new entrants into the market as well as enable churn and movement within the market place as existing business's floorspace needs changes, for instance through expansion. 'Supressed demand' is discussed more fully in **Section 6**.
- 4.3.5 Warrington's availability rate is higher than the FEMA average, at 5.4%, but is still below the 9% threshold currently. Wigan is the most supply-constrained with only a 2.5% availability rate.
- 4.3.6 The higher availability rate in Warrington can be explained by the stronger performance of WBC

historically in allocating land for new I&L development. Net deliveries have averaged 437,000 sqft per annum, representing 1.9% of Warrington's inventory, the highest level in the FEMA (both in absolute terms and as % of inventory). In fact Warrington's net deliveries of I&L stock is more than double the FEMA average as a proportion of inventory and nearly 90% higher, in absolute terms, than the next highest local authority being St Helens.

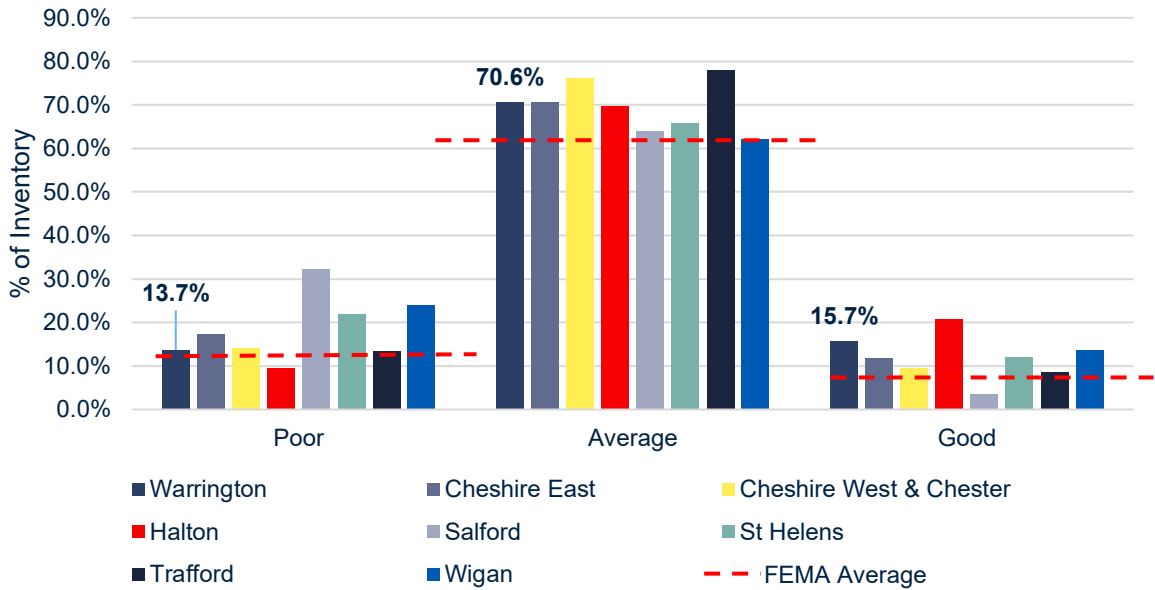
Table 4.2 Summary of Supply Indicators for I&L across the FEMA

| Local Authority | Total Inventory (2021 YTD) | Availability Rate (2021 YTD) (%) | Ave. Net Deliveries p.a. (2011 2021) | Net Deliveries as % of Inventory |
|------------------------------------|----------------------------|----------------------------------|--------------------------------------|----------------------------------|
| Warrington | 23,104,847 | 5.4% | 436,952 | 1.9% |
| Cheshire East | 23,268,383 | 4.8% | 192,514 | 0.8% |
| Cheshire West & Chester | 20,275,638 | 3.2% | 112,939 | 0.6% |
| Halton | 14,634,654 | 3.0% | 174,637 | 1.2% |
| Salford | 18,466,323 | 4.1% | 59,189 | 0.3% |
| St Helens | 15,096,762 | 2.9% | 230,916 | 1.5% |
| Trafford | 25,929,605 | 4.2% | 81,829 | 0.3% |
| Wigan | 21,449,353 | 2.5% | 95,732 | 0.4% |
| FEMA | 162,225,565 | 3.8% | 1,384,708 | 0.9% |

Source: Savills (2021); CoStar (2021)

- 4.3.7 **Figure 4.2** presents the quality of I&L stock across the FEMA. Quality of stock is assessed using CoStar's property rating system, where a star rating of 1 or 2 denotes poor quality, 3 average quality, and 4 or 5 star good quality.
- 4.3.8 Warrington has a much lower proportion (13.7%) of low quality I&L stock when compared with the FEMA (18.1%) average. It has the third lowest proportion of low quality premises, behind Halton (9.6%) and Trafford (13.4%). Warrington also has a much higher proportion of good quality premises (15.7%), when compared with the FEMA (11.8%) average. This is the second highest proportion after Halton (20.7%) and indicates Warrington has been successful in attracting investment in high quality, new and refurbished I&L premises.

Figure 4.2 Quality of I&L Stock across FEMA

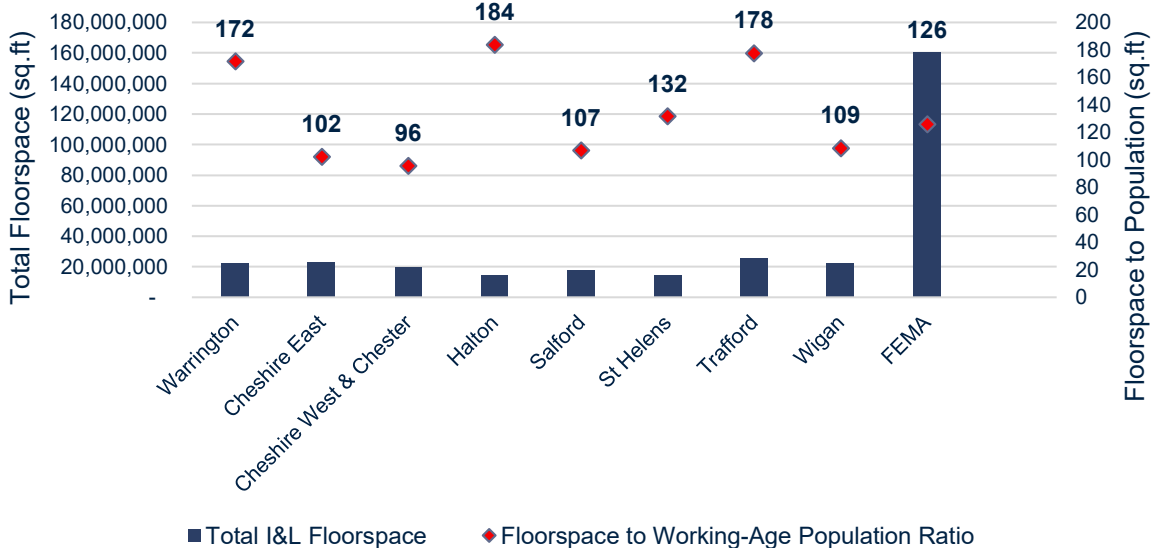


Source: Savills (2021); CoStar (2021)

4.3.9 **Figure 4.3** shows how much I&L floorspace each local authority in the FEMA has per working age resident. In effect it shows how large, and by extension, how important the I&L sector is relative to the size of the local working age population.

4.3.10 Warrington has 172 sqft of I&L floorspace per working aged resident, which is higher than the FEMA average at 126 sqft per job. This demonstrates Warrington is one of the main I&L employment locations in the wider FEMA together with Halton and Trafford. It also indicates how critical the sector is to Warrington’s economy and local jobs market.

Figure 4.3 I&L Floorspace to Working-Age Population Ratios



Source: Savills (2021); CoStar (2021); NOMIS (2019) Population estimates - local authority based by single year of age

4.4 Market Demand Factors

- 4.4.1 **Table 4.3** presents a summary of demand indicators for the I&L market across the FEMA.
- 4.4.2 A lead indicator of demand is net absorption which measures the total amount of I&L floorspace occupied (move-ins) less the total amount of I&L floorspace vacated (move-outs). We have expressed net absorption in both absolute terms and as a % of inventory. This second measure is important as it shows comparatively how strong demands is relative to the size of its inventory.
- 4.4.3 Warrington's net absorption (in absolute terms) averaged 529,000 sqft per annum between 2011 and 2021, the highest in the FEMA. The next largest is Cheshire East with demand at 439,000 sqft per annum, 21% lower than Warrington.
- 4.4.4 Warrington also has one of the strongest levels of demand (net absorption) when expressed as a proportion of its inventory at 2.3%. In comparison the FEMA average is 1.5%. These statistics demonstrate that Warrington is one of the most important I&L markets in the FEMA.
- 4.4.5 Based on the above statistics, it not surprising that Warrington has experienced one of the highest I&L rental growth rates in the FEMA at 73.5%, well above the FEMA average of 56.7%. As we discussed in **Section 3**, strong rental growth typically indicates supply is not keeping pace with demand. This conclusion holds true in the case of Warrington. As discussed above in relation to **Table 4.2**, Warrington has delivered the highest quantum of new I&L stock within the FEMA at 437,000 sqft per annum. However this is still lower that the 529,000 sqft per annum of demand (net absorption) Warrington has recorded over the last decade. Demand being higher than supply explains why availability is on a downward trend and now sits well below Savills 9% supply / demand equilibrium (benchmark) for Warrington.

Table 4.3 Summary of Demand Indicators for I&L across FEMA

| Local Authority | Ave. Net Absorption p.a. (2011 2021) | | Ave. Market Rents (£/sqft) | Rental Growth, 2011 2021 (%) |
|-------------------------|--------------------------------------|----------------|----------------------------|------------------------------|
| | sqft | % of Inventory | | |
| Warrington | 529,479 | 2.3% | £7.48 | 73.5% |
| Cheshire East | 439,377 | 1.9% | £6.63 | 44.1% |
| Cheshire West & Chester | 264,141 | 1.3% | £6.15 | 42.4% |
| Halton | 338,106 | 2.3% | £6.28 | 78.9% |
| Salford | 137,654 | 0.7% | £6.18 | 58.5% |
| St Helens | 380,057 | 2.5% | £5.87 | 52.9% |
| Trafford | 182,191 | 0.7% | £7.24 | 56.7% |
| Wigan | 230,733 | 1.1% | £5.99 | 54.0% |
| FEMA | 2,502,509 | 1.5% | £6.55 | 56.7% |

Source: Savills (2021); CoStar (2021)

5 Local Market Assessment

5.1 Introduction

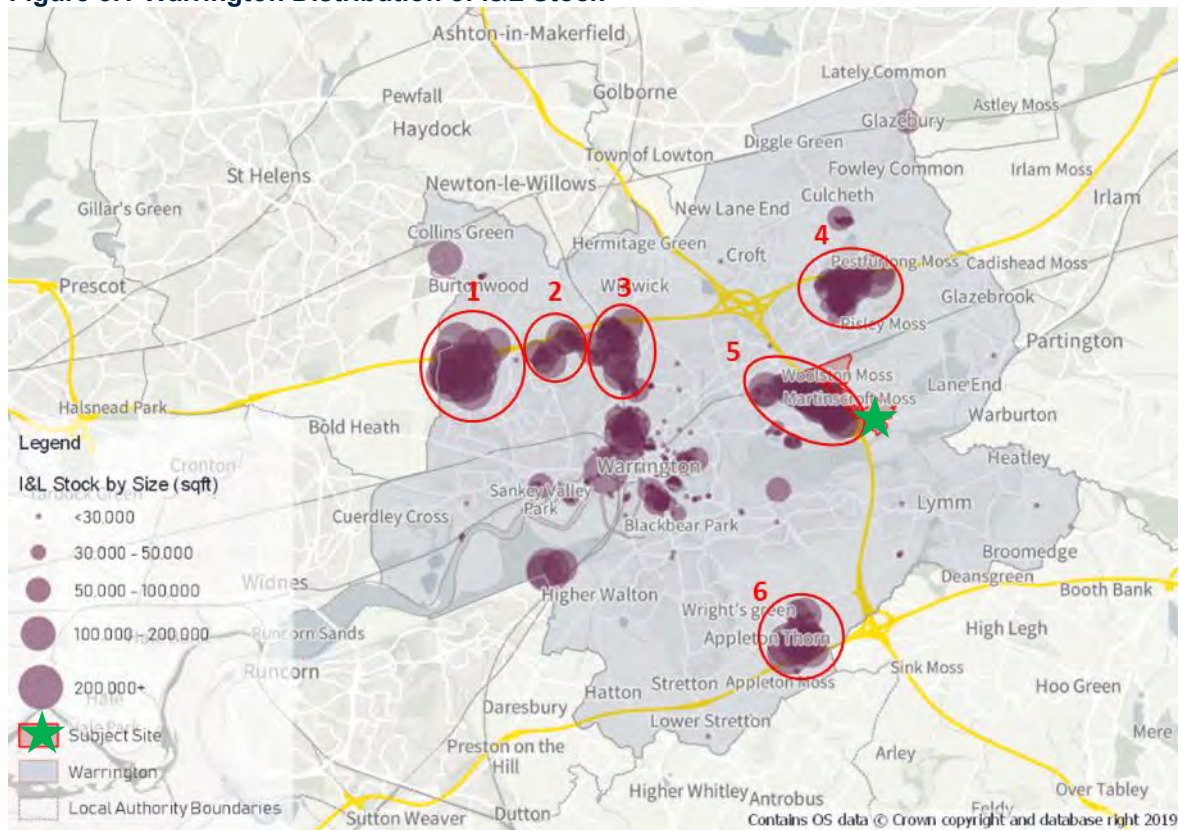
5.1.1 This Section builds upon the regional market assessment in **Section 4** by providing a more detailed assessment of Warrington's local I&L market.

5.2 Warrington Market Assessment

5.2.1 Warrington has an industrial stock of 22 million sqft. This is geographically concentrated in six locations (**Figure 5.1**) adjacent to motorways:

- No. 1 in the north west of the Warrington is Omega by the M62;
- No. 2 is Gemini by the M62;
- No. 3 is the Winwick Road Corridor at the intersection of the M62 and A49;
- No. 4 in the north east of the borough is Birchwood Technology Park with adjacent industrial estates;
- No. 5 is Woolston Grange by the M6 opposite the Subject Site; and
- No. 6 by the M56 in the south of the Borough are Barleycastle Trading Estate and Appleton Thorn Trading Estate.

Figure 5.1 Warrington Distribution of I&L Stock

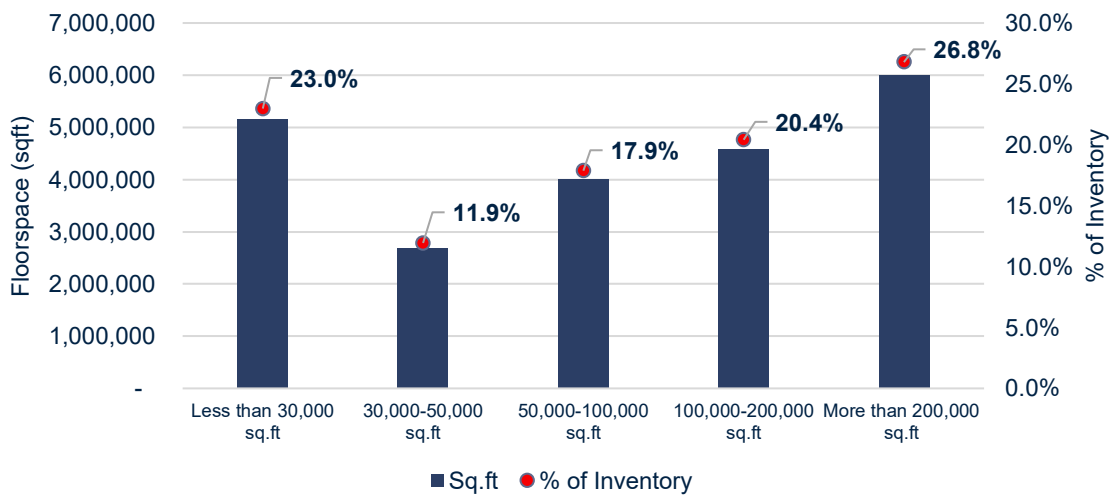


Source: CoStar, Savills

Stock by Size Band

5.2.2 **Figure 5.2** presents the I&L stock in Warrington by size band. The majority (26.8% or 6 million sqft) of Warrington’s I&L stock is concentrated in the largest size category of more than 200,000 sqft, followed by 23% (or 5 million sqft) of stock in the smallest size category of less than 30,000 sqft. While the size category of 30,000-50,000 sqft accounts for the smallest proportion of Warrington’s total stock at 11.9% (2.7 million sqft), overall the local market is fairly balanced in terms of the size of units. This demonstrates Warrington is seen as an attractive location to a range of I&L investors and occupiers with different size requirements.

Figure 5.2 Warrington I&L Stock by Size Band



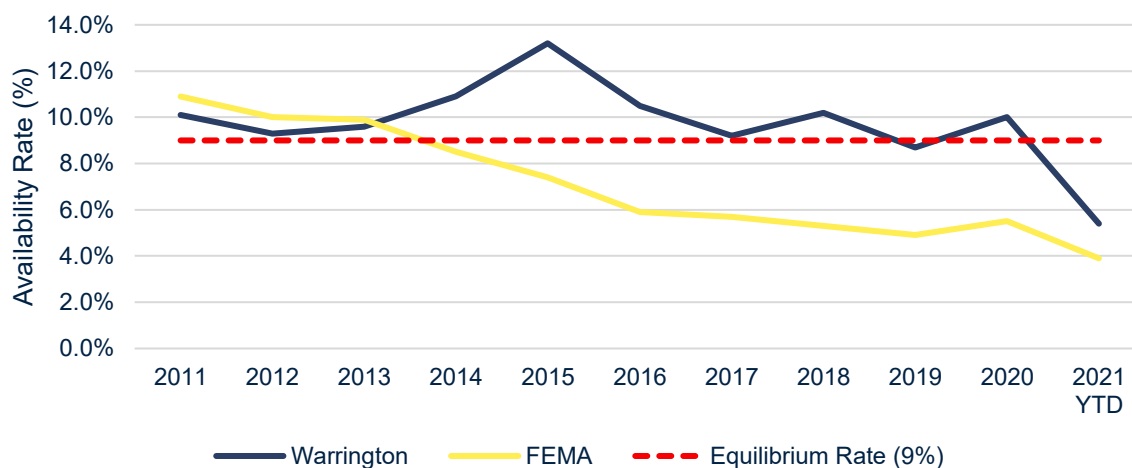
Source: Savills (2021); CoStar (2021)

Historic Availability

5.2.3 **Figure 5.3** presents the historic availability rate in Warrington as well as the in the FEMA, between 2011 and 2021. As mentioned in **Section 3**, we consider the Warrington market to be supply constrained when floorspace availability is below 9%.

5.2.4 Warrington has facilitated the supply of I&L land to accommodate new development. However since 2015 availability has been a downward trajectory and has now dropped below the 9% equilibrium rate. The rest of the FEMA has been below the 9% equilibrium rate since 2014 demonstrating, as a whole, the entire FEMA has been supply constrained for much of the last decade. This effectively means demand that would have gravitated to the FEMA has likely been lost to other locations due to the lack of available supply. We discuss this impact, called ‘suppressed demand,’ in **Section 6**.

Figure 5.3 Historic Availability Rate in Warrington and FEMA (2011-2021)



Source: Savills (2021); CoStar (2021)

Availability by Size Band

5.2.5 **Table 5.1** shows the largest size band (200,000 plus sqft) is particularly supply constrained with no floorspace currently available, followed by the 100,000 to 200,000 sqft size band at only 3.6%. The majority of space available is concentrated in the smallest size category of less than 30,000 sq.ft and the 50,000 to 100,000 sq.ft category.

Table 5.1 Available Floorspace by Size Band

| Size Band | Available Floorspace (sqft) | Availability Rate (%) |
|--------------------------|-----------------------------|-----------------------|
| Less than 30,000 sq.ft | 330,593 | 6.4% |
| 30,000 to 50,000 sq.ft | 162,879 | 6.3% |
| 50,000 to 100,000 sq.ft | 349,284 | 8.3% |
| 100,000 to 200,000 sq.ft | 162,857 | 3.6% |
| 200,000 + sq.ft | - | 0.00% |

Source: Savills (2021); CoStar (2021)

5.2.6 The proposed Junction 21 Birchwood site, while attractive to all size bands, will be particularly attractive to larger units given its direct adjacency to the M6.

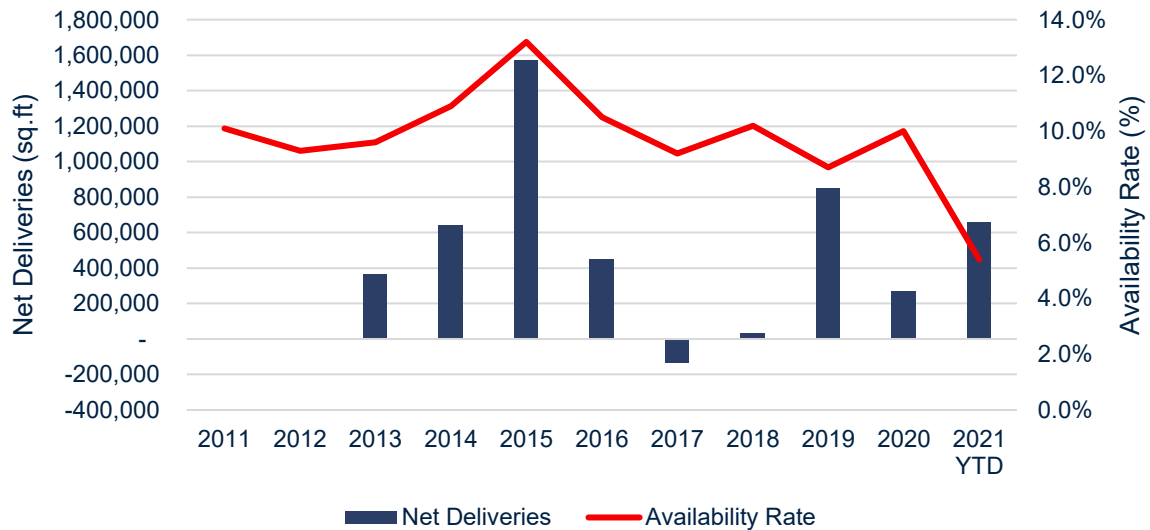
Historic Deliveries

5.2.7 **Figure 5.4** presents historic deliveries of I&L floorspace in Warrington, between 2011 and 2021. As discussed in **Section 3**, Warrington has experienced the strongest average rate of new deliveries across the FEMA, between 2011 and 2021, reflective of its regional importance as an I&L location and its attractiveness to investors and occupiers.

5.2.8 2015 saw the largest amount of new I&L floorspace delivered (nearly 1.6 million sqft), leading to a rise in the availability rate to 13.2%. The Hut Group’s delivery of a 686,000 sqft shed at Omega South and ASDA’s 631,000 sqft shed, also at Omega South, accounted for much of this growth. 2019 was also a particularly strong year with over 800,000 sqft of new deliveries. Again new development at Omega South contributed to much of this growth along with new development at Omega 88 and Aston Fields Road. However availability on the whole has trended downwards since the high of 2015 as net deliveries have failed to keep pace with the strong demand to now stand at only 5.4%, well below the 9%

equilibrium rate when supply and demand are considered to be broadly in balance.

Figure 5.4 Net Deliveries vs Availability Rate, 2011-2021

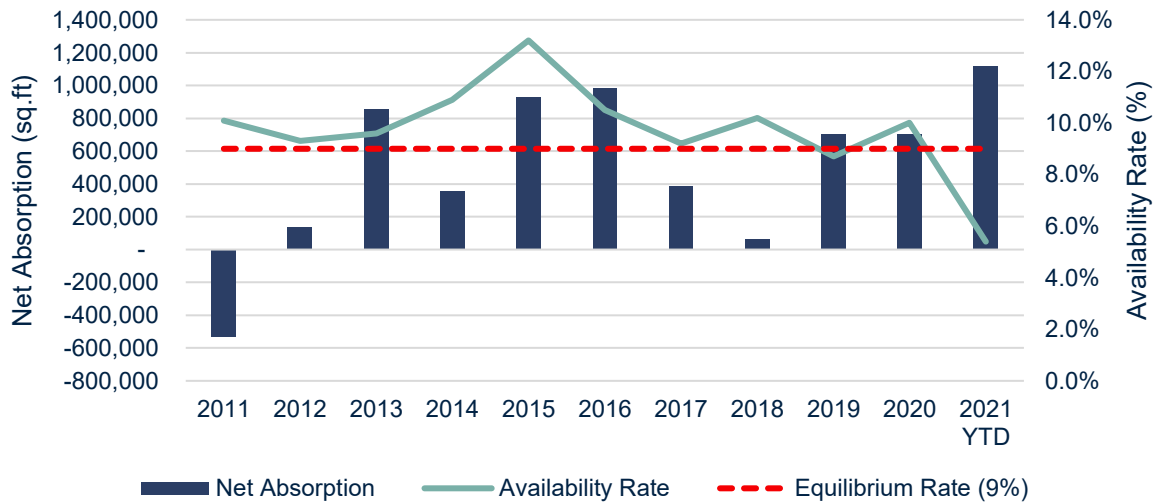


Source: Savills (2021); CoStar (2021)

Historic Net Absorption

- 5.2.9 **Figure 5.5** presents historic net absorption in Warrington between 2011 and 2021. As discussed in **Section 4**, Warrington has one of the strongest levels of demand in the FEMA, both in absolute terms and relative to the size of its inventory, consistent with its sub regional importance as an I&L market.
- 5.2.10 Warrington has experienced negative net absorption in only 1 year (2011) in the last decade. This is attributed to the economic shocks caused by the GFC. Since 2012, Warrington has experienced positive net absorption, with the highest level of net absorption recorded in the current year (to October 2021) at nearly 1.2 million sq.ft. This demonstrates the current strength of demand and follows on from strong years in 2013, 2015, 2019 and 2020 where net absorption was above 650,000 sqft per annum.
- 5.2.11 To put this strength of demand into perspective, the 1.25 million sqft proposed at Junction 21 Birchwood represents just over 2 years of supply when measured against the 10 year historic net absorption rate of 529,000 sqft per annum, and even less against Savills estimate of future demand as outlined in **Section 6**.
- 5.2.12 **Figure 5.5** is also useful in illustrating the inextricable link between supply (floorspace availability) and demand (net-absorption). From 2013 to 2016 when availability was above the 9% equilibrium rate, net absorption averaged 780,000 per annum. However net absorption has been lower since averaging only 625,000 sqft per annum between 2017 to 2021. This has corresponded with the sharp decline in availability from over 12% in 2015 to 5.4% currently. There is no other apparent reason for this reduced average net-absorption (demand) other than supply constraints give rents have been rising and the I&L market has been going from strength to strength with the sector having its strongest year nationally in 2020 (see **Appendix A**). Warrington doesn't just need new supply over the plan period but sites that can deliver quickly in the short to medium term to meet current strong demand. Junction 21 Birchwood is deliverable and ideally located to deliver this new supply as discussed in **Section 2**.

Figure 5.5 Net Absorption vs Availability Rate, 2011-2021



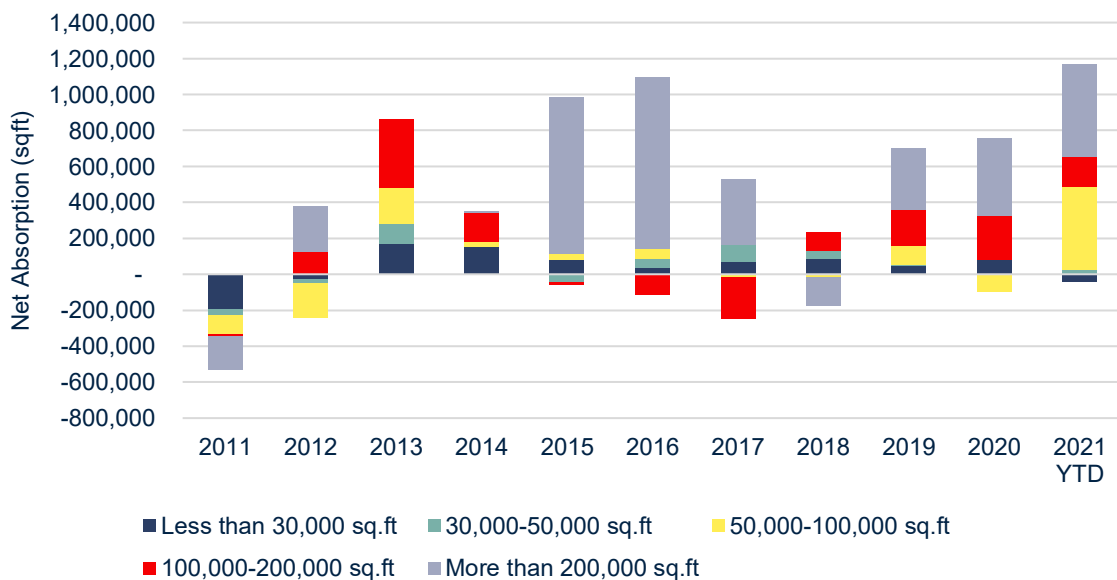
Source: Savills (2021); CoStar (2021)

Historic Net Absorption by Size Band

5.2.13 **Figure 5.6** presents historic net absorption in Warrington between 2011 and 2021 by size band.

5.2.14 In 2012, 2015, 2016, 2019 and 2020, the largest size band of more than 200,000 sqft made up the majority of positive net absorption in Warrington. This indicates demand for larger units is driving the market and explains why this size band has the lowest proportion of available floorspace (see **Table 5.1** above). The proposed Junction 21 Birchwood site, while attractive to all size bands, will be particularly attractive to larger units given its direct adjacency to the M6.

Figure 5.6 Net Absorption by Size Category, 2011-2021



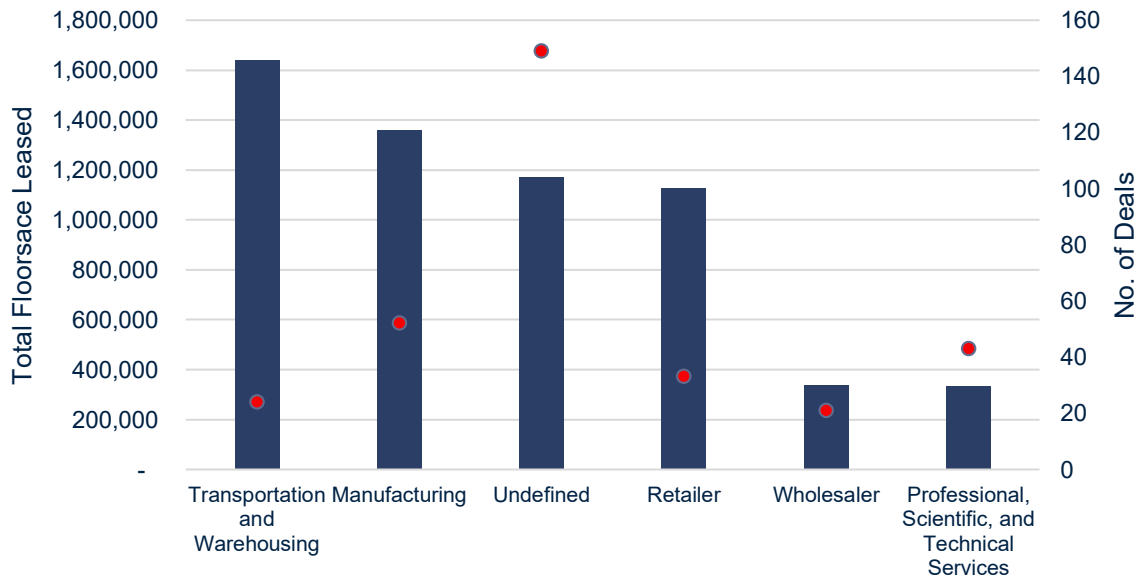
Source: Savills (2021); CoStar (2021)

Leasing Activity by Sector

5.2.15 **Figure 5.7** presents leasing activity by sector in Warrington between 2016 and 2021. The top 5 sectors (as well as deals with an undefined sector) accounting for the highest amount of floorspace leased in the 5 year period are presented.

5.2.16 Tenants in the ‘Transport and Warehousing’ sector accounted for the majority of I&L floorspace leased between 2016 and 2021 in Warrington, accounting for over 1.6 million sqft (or 24 deals). This is followed by the ‘Manufacturing’ and ‘Retailer’ sectors, with around 1.4 million sqft and 1.1 million sq.ft leased across 53 and 69 deals respectively.

Figure 5.7 Leasing Activity by Sector, 2016-2021



Source: Savills (2021); CoStar (2021)

6 Future Land Needs

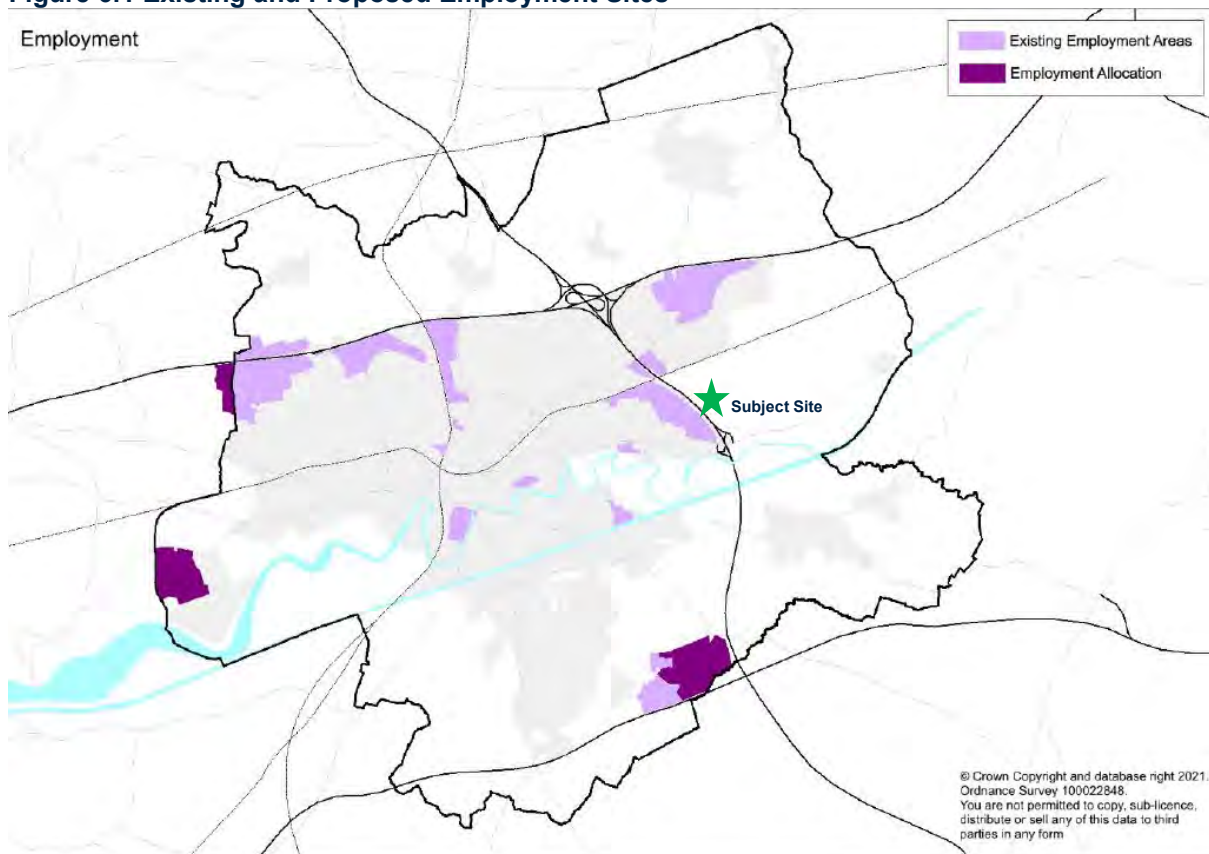
6.1 Introduction

- 6.1.1 The purpose of this Section is to estimate Warrington's future I&L land needs and compare this with its existing land supply. We focus primarily on market supply and demand dynamics given job based forecasts have rightly been discounted in the EDNA as being unreliable.
- 6.1.2 We then estimate future I&L need based on historic net absorption, not completions as used in the EDNA, and then adjust for 'suppressed demand'. We consider our approach addresses a number of the methodological shortfalls we identified with the EDNA in **Section 3**. Our methodology also allows for a 3-year buffer and business displacement from the Warrington Masterplan interventions consistent with the EDNA.
- 6.1.3 We then estimate future I&L need based on historic net absorption, not completions as used in the EDNA, and then adjust for 'suppressed demand'. We consider our approach addresses a number of the methodological shortfalls we identified with the EDNA in **Section 3**. Our methodology also allows for a 3-year buffer and business displacement from the Warrington Masterplan interventions consistent with the EDNA.
- 6.1.4 The results of the Savills' methodology, when compared with supply, yields a **shortfall of 195.49 ha** of I&L land over the plan period. We consider the proposed 40.25 ha of I&L land at Junction 21 Birchwood to be ideally placed to help meet this shortfall.

6.2 I&L Land Supply

- 6.2.1 Policy DEV4 in the Updated Proposed Submission Version Local Plan (UPSVP) (2021) seeks to ensure there is a sufficient supply of employment land to support Warrington's economic growth over the Plan period (2021-2038), supporting existing employment locations and allocating new land. **Figure 6.1** shows the existing employment areas within the borough together with the proposed new allocations.

Figure 6.1 Existing and Proposed Employment Sites



Source: Warrington UPSVLP (2021)

6.2.2 For I&L uses, the EDNA (2021) indicated a need of 242.26 ha of employment land up to 2038. WBC aims to meet this need via: an existing (as of October 2021) I&L land supply of 29.99 ha, 31.22 ha from the St Helens’ Omega extension secured through Duty to Co-operate discussions¹⁵, and a further 237.92 ha to be provided through two new allocations:

- **Fiddlers Ferry Brownfield Site:** 101 ha
- **South East Warrington Employment Area:** 136.92 ha

6.2.3 A summary of WBC’s available land supply from the new Local Plan is found in **Table 6.1**.

Table 6.1 WBC’s Available I&L Employment Land Supply

| | Land Supply (ha) |
|--|------------------|
| Existing supply | 29.99 ha |
| St Helens Omega Extension | 31.22 ha |
| Allocations (i.e. South East Warrington Employment Area and Fiddlers Ferry) | 237.92 ha |
| Total | 299.13 ha |

¹⁵ Which established that Omega employment development located in the Borough of St Helens will count towards Warrington’s employment development needs

6.2.4 These proposed allocations, as well as other allocation options set out in the EDNA, are discussed in more detail in **Section 7**.

6.2.5 The total of 299.13 ha is above the EDNA's estimated need of 242.26 ha.

6.3 Estimated Future Demand

Net absorption as a lead indicator of historic demand

6.3.1 As discussed in **Section 3**, net-absorption (move-ins minus move-outs) is a more accurate measure of demand than completions used in the EDNA (note: the EDNA refers to completions as take-up). Completions is a supply measure which primarily depends on new land being allocated as part of the Local Plan process followed by the grant of planning permission before new development is constructed. This is a lengthy process which explains why completions (new supply) typically lags demand (net absorption) as has been the case in Warrington. Using net absorption rather than completions results in a higher historic demand profile. For example, completions in Warrington since 2011 averaged 465,754 sqft per annum, which is lower than average net absorption over the same period at 529,479 per annum.

Accounting for suppressed demand

6.3.2 The Savills methodology also accounts for 'suppressed demand' as a top-up to the historic demand profile (based on net absorption). The rationale for accounting for suppressed demand is that when sufficient supply isn't available, demand cannot be accommodated. Therefore by only projecting forward past trends, as the EDNA has done, only serves to continue planning for a suppressed level of demand.

6.3.3 Supply and demand are inextricably linked across all commercial property sectors. Put simply if demand exceeds supply rents typically rise more quickly as occupiers vie for limited available stock. This can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance due to expansion. It may also happen that some existing local companies get priced out of the market as they can't afford the increasing rents. As a result, companies either have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the costs of doing business, not to mention environmental impacts. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity.

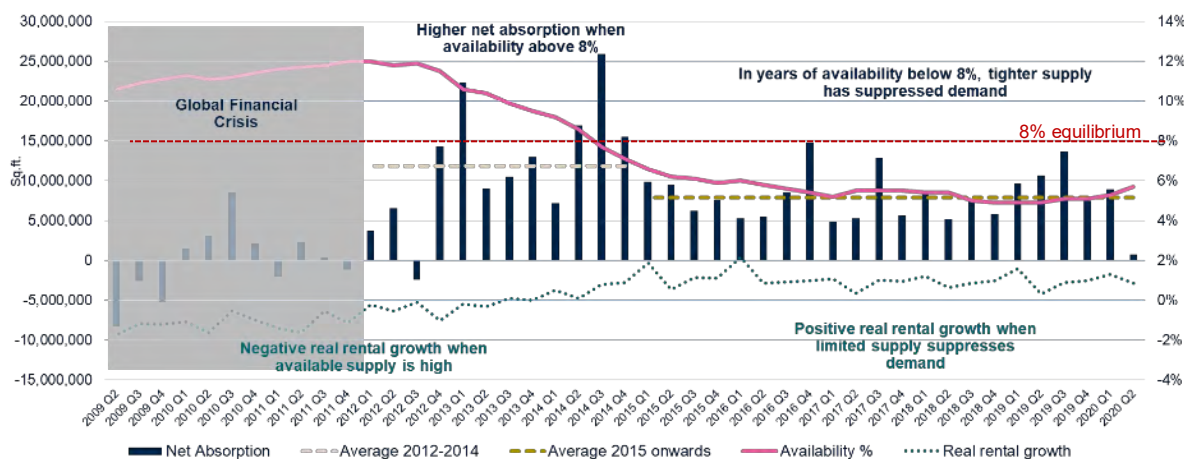
6.3.4 We describe a market where supply doesn't keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as Warrington's I&L sector, means that demand cannot be fully satisfied, typically resulting in strong rental growth. As demonstrated in **Section 4**, Warrington's I&L rents have increased by 74% since 2011, indicating new supply has struggled historically to keep pace with the strong demand. At the national level the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8% availability. This benchmark rate is found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance (SPG).

6.3.5 If one studies real rental growth (i.e. rental growth adjusted for inflation) over the past decade at the national level and observes its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8%. This relationship is clearly illustrated in **Figure 6.2** below. When availability was above 8% between 2009 and 2014 real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was

available.

- 6.3.6 However since 2014, as availability dipped below 8% and has stayed below this level ever since at the national level, real rents have grown strongly year on year. During this period net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This clearly shows the suppressing nature tight availability (below 8%) has had on I&L demand nationally.

Figure 6.2 Historic Net Absorption (Sqft.), Availability (%) and Real Rental Growth (%) in England



Source: CoStar, OBR, Savills

Warrington-specific equilibrium availability rate

- 6.3.7 While 8% availability is the market equilibrium observed at the England level, our analysis shows that this equilibrium threshold varies across markets. The equilibrium availability rate in the North West Region – where Warrington is located - is 9%. For our suppressed demand calculations we therefore use this threshold which is tailored to the local market, rather than the 8% rate which is a national level figure.
- 6.3.8 We calculated the equilibrium rate for the North West Region by looking at real (i.e. adjusted for inflation) rental growth over the past decade and finding the point at which it was close to zero and transitioned from negative to sustained positive growth. **Table 6.2** presents the variables used to find the market equilibrium rate for the North West Region. It can be seen that the years 2014 and 2015 mark the transition between a period of largely negative real rental growth and a period of sustained positive rental growth, indicating the market was broadly in equilibrium around 9% availability.

Table 6.2 Finding the Market Equilibrium Availability Rate – North West

| Period | Availability Rate | GDP deflator | Real Rent £/sqft | Quarterly Real Rental Growth |
|--------|-------------------|--------------|------------------|------------------------------|
| 2020 | 6.4% | 108.1 | £5.06 | -1.2% |
| 2019 | 6.0% | 102.1 | £5.13 | 1.3% |
| 2018 | 6.2% | 100.0 | £5.06 | 1.8% |
| 2017 | 6.6% | 97.8 | £4.97 | 8.3% |
| 2016 | 7.3% | 95.9 | £4.59 | 8.4% |
| 2015 | 8.4% | 93.9 | £4.24 | 4.8% |
| 2014 | 9.4% | 93.3 | £4.04 | -3.1% |
| 2013 | 10.8% | 91.7 | £4.17 | 0.8% |
| 2012 | 12.6% | 90.1 | £4.14 | -1.3% |
| 2011 | 12.8% | 88.7 | £4.19 | -5.4% |

| | | | | |
|-------------|-------|------|-------|-------|
| 2010 | 11.9% | 86.9 | £4.43 | -4.8% |
| 2009 | 11.5% | 85.5 | £4.65 | |

Source: CoStar, OBR, Savills

Savills Methodology

6.3.9 Below we detail the Savills methodology for estimating future I&L land need in Warrington. It incorporates the principles discussed above, namely the use of net absorption rather than completions (used in the EDNA) and accounts for suppressed demand in those years where supply is below the 9% equilibrium threshold calculated for Warrington.

- **Estimation of historic demand:** this is based on annualised net absorption that as discussed in **Section 5** averaged 529,479 sqft per annum between 2011 and 2021 in Warrington;
- **Estimation of suppressed demand:** this is the top-up figure to be added to the historic demand trend to account for years when the market was supply constrained. This measure is calculated as follows:
 - 1) For years where availability has been below the 9% threshold, we calculate the quantum of floorspace necessary to achieve 9% availability (Column “Av. To EQ (sqft)” in the table, calculation **F**);
 - 2) We then take the average of the ratio between net absorption and available floorspace for every year over the past decade (Calculation **E** averages 27.9% based on Column “Net Absorption / Availability”);
 - 3) We apply this average to the estimated floorspace required to reach 9% availability in each period where the market is below the 9% availability threshold to estimate each period’s suppressed demand (Calculation **F*E** in Column “Suppressed Net Absorption (sqft)”);
 - 4) We calculate average suppressed net absorption over the past decade. This gives the annualised suppressed demand figure to be used as a top-up to the historic trend.

Table 6.3 shows the relevant calculations.

Table 6.3 Estimating Suppressed Demand in Warrington

| | A | B | C=(A*B) | D | D/C | F=(9%*- B)*A | F*E |
|-------------|------------------------------|-----------------------------|------------------------------|---------------------------------------|---|------------------------------|--|
| | Inventory (sq.ft) | Availability (%) | Available (sq.ft) | Net Absorption (sq.ft) | Net Absorption/ Availability | Av. To EQ (sq.ft) | Suppressed Net Absorption (sq.ft) |
| 2021 YTD | 23,104,847 | 5.4% | 1,247,662 | 1,117,661 | 89.6% | 831,774 | 232,415.8 |
| 2020 | 22,451,000 | 10.0% | 2,245,100 | 702,079 | 31.3% | - | - |
| 2019 | 22,179,652 | 8.7% | 1,929,630 | 700,603 | 36.3% | 66,539 | 18,592.4 |
| 2018 | 21,329,845 | 10.2% | 2,175,644 | 59,978 | 2.8% | - | - |
| 2017 | 21,298,151 | 9.2% | 1,959,430 | 386,422 | 19.7% | - | - |
| 2016 | 21,431,912 | 10.5% | 2,250,351 | 982,770 | 43.7% | - | - |
| 2015 | 20,983,570 | 13.2% | 2,769,831 | 928,671 | 33.5% | - | - |
| 2014 | 19,414,570 | 10.9% | 2,116,188 | 352,601 | 16.7% | - | - |
| 2013 | 18,774,942 | 9.6% | 1,802,394 | 855,702 | 47.5% | - | - |
| 2012 | 18,407,608 | 9.3% | 1,711,908 | 135,394 | 7.9% | - | - |
| 2011 | 18,407,608 | 10.1% | 1,859,168 | -529,979 | -28.5% | - | - |

E= Average

Suppressed
Demand =
Average

Source: Savills

Warrington, unlike many markets in England, has retained a reasonably healthy delivery rate, meaning that for most of the past decade supply has kept up with demand, only dropping below the equilibrium availability level of 9% in 2019 and 2021. The estimated suppressed demand figure for Warrington is 23,350 sqft per annum (i.e. 251,008 sqft divided by 10.75 years which is the Savills look back period since 2011).

- **Projecting forward the combined historic and suppressed demand:** this step requires adding the combined annualised historic and suppressed demand figures (529,479 sqft + 23,350 sqft), totalling 552,829 sqft per annum, and multiplying this by the number of years in the plan period (552,829 sqft x 18 years), which gives 9.95 million sqft.
- **Adjusting for current and future increases in online retail:** Our analysis of leasing activity since 2011 in Warrington indicates that 50% of industrial demand is linked to e-commerce¹⁶. 50% of projected demand corresponds to 4.93 million sq. ft (50% * 9.95 million sq. ft) over the plan period. Forecasts of online sales annual increases are projected to be 66% above the historic trend¹⁷. Applying this 66% uplift to the historic and suppressed demand from e-commerce sectors yields a future demand of 13.2 million sq. ft over the plan period. This equates to an uplift of 3.3 million sq. ft (**Table 6.4**).

Table 6.4 Adjusting for Current and Future Increases in Online Retail

| Demand | Annual (sq. ft) | Over Plan Period (sq. ft) |
|---|-----------------|---------------------------|
| E-commerce related (50% of historic + suppressed) | 273,662 | 4,925,914 |
| E-commerce related after 66% uplift | 454,279 | 8,177,018 |
| E-commerce demand uplift | +180,617 | +3,251,103 |

Source: Savills (2021)

- **Adding a 3-year buffer:** we apply a buffer of 3 years on top of the estimated plan period of 18 years to provide a continuum of supply beyond the end of the plan period and to account for the current day I&L growth drivers discussed in **Section 3**. A 3-year buffer is also included within the EDNA and under the Savills methodology accounts for an additional 2.2 million sqft (733,446 sqft per annum x 3 years).
- **Allowing for Displacement:** the EDNA estimated that a further 17.64 ha would be needed to allow for business displacement associated with Warrington Masterplan projects. At a 30% plot ratio this equates to 569,626 sqft. Our use of a 30% plot ratio is discussed in paragraph 6.3.11 below. This is reflective of changes to the nature of modern I&L occupiers that are moving

¹⁶ CoStar (2021): Leasing activity in the sectors 'Transportation and Warehousing'; 'Retailer'; and 'Wholesaler'

¹⁷ Forrester Research – Online Retail in UK, 2002-2025: We look at the uplift in online retail spending between 2022 and 2025 versus the average for 2011-19

towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping.

- 6.3.10 The above steps yield a total need of 15.97 million sqft over the 18 year Local Plan period to 2038, as summarised in **Table 6.5**.

Table 6.5 Summary of Future Demand (over Plan Period)

| Adjustment Type | Adjustment (sqft) | Total floorspace (over 18 year plan period) |
|---|-------------------|--|
| Historic Demand (Net Absorption) Over 18 years | | 9,530,627 |
| Suppressed Demand | +420,293 | 9,950,919 |
| E-commerce-related Uplift | + 3,671,396 | 13,202,023 |
| 3-year Buffer | + 2,200,337 | 15,402,360 |
| Displacement | + 569,626 | 15,971,986 |
| TOTAL | | 15.97 million sq.ft |

Source: CoStar, Savills

Plot Ratios

- 6.3.11 Traditionally, I&L plot ratios used for local planning purposes have been in the region of 40%. However, based on our market experience this plot ratio is deemed too high and clearly disregards changes in the nature of modern I&L occupiers that are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping.
- 6.3.12 Using plot ratios that are too high inevitably leads to an underestimation of employment land needs. We have reviewed a number of recent proposals for industrial parks in Warrington, which are consistent with examples of developments by St Modwen and other developers, and have estimated their plot ratios. This work is summarised in **Table 6.6**.
- 6.3.13 Gross plot ratios have been calculated after taking into account the net developable area of a site excluding roads, landscaping and service areas. The analysis shows that appropriate plot ratios for the estimation of future I&L land need are in the region of 30% of gross development land.

Table 6.6 Plot Ratio Case Studies in Warrington and other Local Authorities

| Local Authority | Site Name | Plot Ratio (%) |
|--------------------|----------------------------------|----------------|
| Warrington | Mountpark Warrington Omega II | 36% |
| Warrington | The Quadrant South | 34% |
| Warrington | The Quadrant - Other | 23% |
| North Kesteven | St Modwen Park, Lincoln | 32% |
| North Warwickshire | St Modwen Park, Tamworth | 26% |
| Mid Sussex | GAL at St Modwen Park Gatwick | 34% |
| Newport | Amazon, St Modwen Park, Newport | 26% |
| Bristol | Ocado, St Modwen Park, Avonmouth | 36% |
| Blaby | Optimus Point Plot 70 | 17% |
| Blaby | Optimus Point Plot 80 | 31% |

| | | |
|---------------------------|---|---------------------------------|
| West Leicestershire | Mountpark Bardon 2 | 35% |
| Oadby and Wigston | Wigston Industrial Estate | 34% |
| Charnwood | Unit 2, Rowena Park - Rothley | 33% |
| Harborough | Symmetry Park, Lutterworth opt.1 | 29% |
| North Northamptonshire | West End, Raunds, Northamptonshire | 29% |
| Uttlesford | Land north of Taylor's Farm, Takeley Street | 29% |
| North Warwickshire | Land North East of Sewage Works, Atherstone | 36% |
| Buckinghamshire | Symmetry Park Aston Clinton | 31% |
| Central Bedfordshire | Symmetry Park Biggleswade | 30% |
| Swindon | Symmetry Park Swindon | 30% |
| North West Leicestershire | East Midlands Gateway | 17% |
| North Warwickshire | Prologis Site - Hams Hall | 21% |
| North Warwickshire | BIFT - Plot 7, Birch Coppice Business Park | 34% |
| Blaby | Optimus Point Plot 70 | 17% |
| | | Average plot ratio = 29% |

Source: St Modwen, Savills

6.4 Future Need

- 6.4.1 The supply and demand balance for Warrington is calculated by subtracting the total supply from the estimated future needs. As discussed, Warrington's I&L floorspace needs total 15.97 million sqft over the plan period based on the Savills methodology. At a 30% plot ratio this equates to 494.62 ha of land. The I&L supply, calculated in **Table 6.2**, totals 299.13 ha. Subtracting this from the estimated need gives **a shortfall of 195.49 ha**. This calculation, based on the Savills methodology, is shown in **Table 6.7** along with how it compares with the EDNA's estimates.

Table 6.7 Warrington I&L Future Need

| | EDNA | Savills |
|--------------------------|---------------------------------------|--|
| Future Demand (A) | 242.26 ha | 494.62 ha |
| Supply (B) | 299.13 ha | 299.13 ha |
| Future Need (B-A) | +56.87 ha (positive / surplus) | -195.49 ha (negative / shortfall) |

Source: Savills

- 6.4.2 The proposed Junction 21 Birchwood site is ideally placed to cater for part of this additional need by way of its direct adjacency to Junction 21 of the M6. I&L users typically want to be within 2 hours drive time of their end customers. The direct motorway access afforded by the Junction 21 Birchwood site is critically important to I&L occupiers as it enables a wider potential customer base to be accessed within a reasonable drive time. As discussed in **Section 2**, the site is also conveniently located with respect to key freight handling infrastructure including ports, freight handling airports and rail freight interchanges as well as major conurbations including Warrington, Manchester, Liverpool, Leeds, Sheffield and Birmingham.
- 6.4.3 We consider the Junction 21 Birchwood site in the context of the EDNA's other employment allocations in **Section 7** below.

7 WBC Supply Review

7.1 Introduction

7.1.1 We first review Warrington's existing supply, and then assess other employment land allocation options as set out in the EDNA (2021) (which includes the two proposed allocations in the UPSVLP (2021) of Fiddlers Ferry and South East Warrington Employment Area). The aim of this comparison is to consider the merits of allocating the Subject Site against the other allocation options. We consider further I&L employment allocations to be a critical requirement given our belief that the ENDA has significantly underestimated future demand as outlined in **Section 6** above.

7.1.2 As a result we consider there to be a requirement to allocated a further 195.49 ha of I&L land. This increases to 246.49 ha given we do not consider the entire employment component of the Fiddlers Ferry site to be deliverable within the plan period to 2038. In any event, even if Fiddlers Ferry is delivered by 2038, the need for additional land is still considerable. We consider the Subject Site to be a prime candidate for allocation in the UPSVLP (2021) from the remaining 4 allocation options considered in the EDNA.

7.2 Existing Supply Review

Existing Supply in WBC (as of October 2021)

7.2.1 The EDNA (2021) updates the realistic employment land supply in WBC from the 2019 EDNA to allow for further changes over 2018-21 as assessed in March 2021. It removes sites which:

- Are constrained
- Where the emphasis, through landowner/developer intentions, surrounding uses and/or planning allocations/consents, is on alternative (non B-Class) uses
- Where development has completed since 2018
- Where any development will be to meet the needs of a single existing occupier only and will not meet wider market demand.

7.2.2 As of March 2021, the EDNA finds that the realistic supply of employment land (all uses) in WBC is **38.87 ha**, comprising of the strategic Omega supply (12.7 ha) and local supply totalling 26.17 ha.

7.2.3 The realistic supply for I&L uses only as of March 2021 was **37.72 ha**, as shown in **Table 7.1**.

Table 7.1 Existing Strategic and Local I&L Supply in WBC

| Site Name | Realistic Site Area (ha) (as of March 2021) | Availability (as of May 2021) | Status (as of October 2021) |
|---------------------------------|---|-------------------------------|---|
| Strategic I&L Supply | | | |
| Mountpark Warrington Omega II | 12.70 | 0-1 years | Units 1 and 2 built out (let to Gousto and Amazon, respectively), Unit 3 (approx. 4.93 ha) is under construction (delivery end of 2021/early 2022) and available to let ¹⁸ |

¹⁸ <https://mountpark.com/warrington/>; CoStar (2021)

| Local I&L Supply | | | |
|---|------|-----------|--|
| Unit 4 Appleton Thorn Trading Estate, Lyncastle Road | 1.79 | 0-1 years | Completed in May 2021; available to let ¹⁹ |
| Gemini 8 Retail Park, Charon Way, Westbrook | 4.34 | 1-5 years | To be completed by April 2022 ²⁰ |
| The Quadrant (South), Birchwood Park | 1.87 | 1-5 years | Four units totalling 7,296 sqm remain to be delivered ²¹ |
| Phase 3 - Lingley Mere | 3.62 | 1-5 years | To be completed by February 2022 ²² |
| Travis Perkins Barleycastle Trading Estate | 4.69 | 1-5 years | Appears to be built out September 2021; available to let ²³ |
| Multiple Plots Birchwood Park | 8.75 | 10+ years | All development will be on a design and build basis, responding to individual requirements as they arise ²⁴ |
| TOTAL EXISTING I&L SUPPLY (as of March 2021) | | | 37.72 ha |
| TOTAL EXISTING I&L SUPPLY (as of October 2021) | | | 29.99 ha |

Source: Savills (2021); EDNA (2021)

- 7.2.4 However, as of October 2021, this supply has fallen to just **29.99 ha**, with Units 1 and 2 being built out and let at Mountpark Omega II²⁵, leaving approximately 4.93 ha (Unit 3, which is yet to be let) remaining.
- 7.2.5 It should also be noted that Warrington South (Unit 4, Appleton Thorn Trading Estate) was completed in May 2021²⁶, and Super W (Travis Perkins Barleycastle Trading Estate) was completed in September 2021²⁷, both of which are available to let, and therefore remain a part of WBC's existing supply.
- 7.2.6 Furthermore, the development at Gemini 8 and Phase 3 of Lingley Mere are expected to be completed in 2022, with only Birchwood Park having an employment land supply likely to last more than a decade. However, the EDNA notes that based on recent performance at the Quadrant, all the industrial/warehouse plots at Birchwood Park are likely to be taken up rapidly.

St Helens Omega South Extension

¹⁹ <https://www.my.glenigan.com/#/project/19230049/summary>

²⁰ <https://www.my.glenigan.com/#/project/20279604/summary>

²¹ EDNA (2021)

²² <https://www.my.glenigan.com/#/project/20495331/summary>

²³ <https://www.winvic.co.uk/live/tungsten-park-warrington/>

²⁴ EDNA (2021)

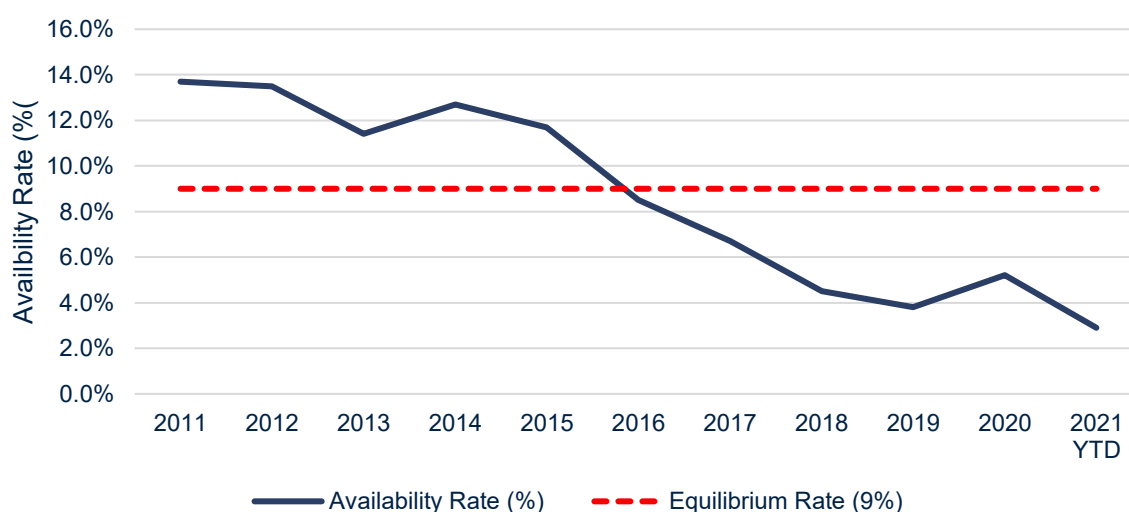
²⁵ <https://mountpark.com/warrington/>; CoStar (2021)

²⁶ <https://search.savills.com/property-detail/gb0393161666>

²⁷ <https://www.winvic.co.uk/live/tungsten-park-warrington/>

- 7.2.7 As discussed, through the Duty to Co-operate WBC reached the agreement that a 31.22 ha extension to the west of the established Omega employment development, located in the Borough of St Helens, will count towards Warrington’s employment land needs. Given the location and the existing character of the Omega employment area we accept this land counts towards Warrington’s I&L land supply.
- 7.2.8 The EDNA and UPSVLP note that this location is also the subject of a s.78 inquiry into an employment development around 40 ha greater than the proposed allocation in the draft St Helens Local Plan. Should this development gain consent then given its location, this additional land could also potentially contribute to meeting needs in Warrington, subject to appropriate agreements between the two Councils.
- 7.2.9 However, we question St Helen’s ability to meet its own future I&L needs given that it has been supply constrained since 2016 (as shown in **Figure 7.1**). Its current availability is 2.9%, well below the market equilibrium rate of 9%. Given this lack of available supply in St Helen’s we feel it will need its own land resources, such as the Omega South Extension, to meet its future needs.

Figure 7.1 St Helens Historic Availability Rate (2011 to 2021) vs Market Equilibrium



Source: CoStar, Savills

Proposed Employment Allocations

- 7.2.10 The EDNA (2021) reviewed 53 sites with the potential for allocation in the new Local Plan, grading sites from A+ to E based on accessibility, physical issues, ability to meet market demand or defined supply gap, and potential to ability to deliver premises within the Plan period (2021-2038).
- 7.2.11 Seven of these sites, graded between A+ and B-, including the Subject Site (Option Six), were shortlisted as potential options for allocations in the new Local Plan, as shown in **Table 7.2**.

Table 7.2 EDNA Employment Allocation Options

| Option No. | Site Name | Gross Site Size (ha) | EDNA Grading |
|------------|---|----------------------|--------------|
| Option One | Land at Bradley Hall Farm, Cliff Road - Six56 (Phase I) | 92 | A+ |
| Option Two | Land around Barleycastle Lane, Barleycastle (Six sites) | 44.92 | A+/B+ |

| | | | |
|--------------|--|---------------|--|
| Option Three | Six56 Phase II | 70 | A- (A+ with more detailed planning) |
| Option Four | Fiddlers Ferry | 101 | A-/B- (A+/B+ - Assuming identified constraints can be addressed) |
| Option Five | Port Warrington | 60 | A-/B- (A+/B+ - Assuming identified constraints can be addressed) |
| Option Six | J21 Birchwood (Subject Site) | 40.25 | A-/B- (A+/B+ - If key constraints can be addressed) |
| Option Seven | Land at Arpley Meadows, Eastford Road - Warrington Commercial Park | 33 | B- (B+ - With investment) |
| Total | | 441.17 | |

Source: Savills (2021); EDNA (2021)

7.2.12 These sites have a combined land area of 441.27 ha. Against the EDNA's lower future demand estimate of 242.26 ha, WBC have only considered it necessary to allocate three sites for B2/B8 uses in the UPSVLP (2021) totalling **237.92 ha** as follows:

- **Fiddlers Ferry Brownfield Site (Option Four):** 101 ha
- **South East Warrington Employment Area (Options One and Two):** 136.92 ha

7.2.13 These proposed allocations alongside the existing and St Helens Omega Extension give an overall supply figure of **299.13 ha** of available I&L land, as summarised in **Table 7.3** below.

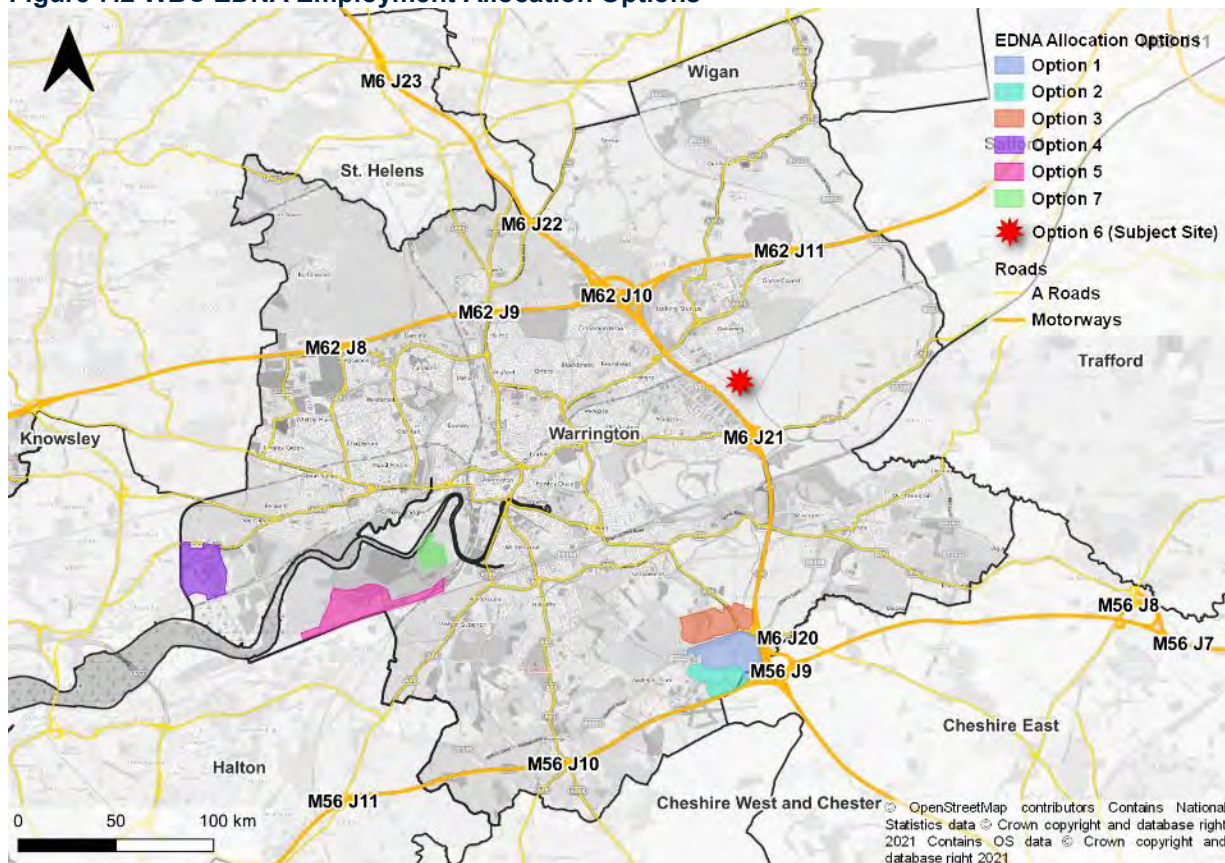
Table 7.3 Summary of WBC's Availability I&L Employment Land Supply

| | Land Supply (ha) |
|--|------------------|
| Existing supply | 29.99 ha |
| St Helens Omega Extension | 31.22 ha |
| Allocations (i.e. South East Warrington Employment Area and Fiddlers Ferry) | 237.92 ha |
| Total | 299.13 ha |

Source: Warrington UPSVLP (2021); WBC EDNA (2021)

7.2.14 However based on the higher Savills future demand estimate of 494.62 ha, this overall supply is 195.49 ha short of what is needed over the plan period. This increases to 246.49 ha given our view that only approximately half of the proposed Fiddlers Ferry employment allocation is deliverable within the plan period. In the following subsections we review the EDNA's allocation options (shown in **Figure 7.2**) against the Subject Site to determine the suitability of each to meet our estimated shortfall within Warrington.

Figure 7.2 WBC EDNA Employment Allocation Options



Source: Savills (2021); EDNA (2021); WBC UPSVLP Additional Site Assessment Proformas (2021)

Option 6: J21 Birchwood (Subject Site)

7.2.15 The Subject Site's attributes are discussed in detail in **Section 2**. We consider it to have location and deliverability advantages over a number of the other employment site options considered in the EDNA as we discuss below. These advantages include:

- The Subject Site is large (40.25 ha) enough to accommodate a variety of unit sizes and benefit from supply chain linkages and other agglomeration benefits such as knowledge spill overs between firms, sharing the costs of estate wide maintenance and security for instance
- The Subject Site is level which is a key requirement for I&L developers
- The Subject Site is likely to benefit from 24-hour access due it not being nearby to sensitive uses. This has become a key operation requirement for I&L occupiers
- The Subject Site is a prime I&L location on the M6 with limited infrastructure requirements given it benefits from direct access to Junction 21 of the M6 via Manchester Road (A57).
- Within a 2-hour drive time, the Subject Site can access a third of England and Wales' resident and business population
- The Subject Site benefits from high levels of workforce accessibility, with the ability to reach 1.1 million people of working age within a 24-minute drive time

- The Subject Site is also conveniently located with respect to key freight handling infrastructure including ports, freight handling airports and Strategic Rail Freight Interchanges (SRFI) within a 2-hour drive time.
- The Subject Site is under single ownership which St Modwen has a development agreement in place for.

Option One & Option Two: South East Warrington Employment Area Proposed Allocation

- 7.2.16 Site Options One and Two make up the South East Warrington Employment Area Proposed Allocation in the UPSVLP (2021).
- 7.2.17 Like the Subject Site, both Option One and Option Two are well-located along the strategic road network (SRN), along the M6 (via Junction 20) and M56 via (Junction 9), which would make the sites attractive to I&L occupiers as discussed in **Section 2**.
- 7.2.18 Option One is under the control of developer Langtree, which have submitted a planning application for and I&L scheme called Six56²⁸.
- 7.2.19 Furthermore, the sites are located in close proximity to the South East Warrington Urban Extension, allowing for a comprehensive approach to the required improvements to road infrastructure and public transport improvements in the wider area²⁹. The UPSVLP (2021) estimates that the employment land will be delivered by the end of the plan period in 2038.
- 7.2.20 Savills considers that the South East Warrington Employment Area (comprising of Options One and Two) has the potential to be a suitable employment allocation to meeting future I&L needs.

Option Three: Six56 Phase II

- 7.2.21 The site is located to the north of the South East Warrington Employment Area Proposed Allocation, and is therefore also well-located along the SRN, being in close proximity to both Junction 20 of the M6 and Junction 9 of the M56.
- 7.2.22 WBC note that the Transco pipeline runs across the site from east to west, reducing the amount of developable land³⁰.
- 7.2.23 This land, previously proposed for housing, is comprised of 11 sites, with most owners appearing to have an option agreement with Langtree. Langtree would look to deliver a second phase of the Six56 scheme, discussed above, if it was concluded that housing was no longer needed at this site.³¹ The second phase of Six56 would benefit from the proposed improvements of J20 of the M6 in Phase 1 of the scheme.
- 7.2.24 The deliverability of Phase 2 of Six56 would rely on the assumption that housing is no longer needed on this site³². Furthermore, the delivery timeframe of employment floorspace at this location will be dependent on delivery of Phase 1 of the Six56 scheme, which has yet to receive planning permission.

²⁸ <https://www.six56warrington.co.uk/>

²⁹ WBC Updated Proposed Submission Version Local Plan Additional Site Assessment Proformas (2021)

³⁰ WBC Updated Proposed Submission Version Local Plan Additional Site Assessment Proformas (2021)

³¹ WBC Updated Proposed Submission Version Local Plan Additional Site Assessment Proformas (2021)

³² EDNA (2021)

Therefore, there is a level of uncertainty as to when the site could be delivered for I&L floorspace.

Option Four: Fiddlers Ferry Proposed Allocation

7.2.25 Option Four is a Proposed Allocation in the UPSVLP (2021).

7.2.26 Fiddlers Ferry Power Station officially closed in March 2020³³, providing the potential to remediate a brownfield site for employment uses.

7.2.27 Fiddler's Ferry Masterplan Briefing Note (April 2021), prepared by SLR Consulting on behalf of SSE (the landowners), outlines the likely capacity of the site to accommodate both employment and residential development and indicative delivery timeframes. In terms of employment capacity the site is earmarked to deliver 89.7ha (net) of employment land for large scale distribution, logistics, industrial uses and low carbon energy projects. The total floorspace potential across this employment area is estimated at 4 million sqft to be delivered between 2023-2030.

7.2.28 We do not consider this to be a realistic timeframe for a number of reasons as we detail further below.

- **Lack of a delivery partner:** There is no delivery partner³⁴ in place for the scheme, unlike the Subject Site where St Modwen are in place – an experienced national I&L developer who build and manage major sites throughout the UK. Finding a suitable delivery partner can be a lengthy process particularly for large and complex brownfield sites such as Fiddlers Ferry. Typically interested parties will be asked to submit formal bids, followed by interviews as part of the selection process. Given the site is mixed use, it is likely there will be different delivery partners for the residential and employment components which may complicate matters to some degree.
- **Costly and time consuming remediation:** Given the site's former use as a power station and associated ash logons, extensive remediation works will be required. This is likely to be both costly and time consuming given the need for necessary approvals, specialist engineering works and removal. Given these issues we do not consider the Masterplan Briefing Note's assumption that remediation will commence in 2022 and end in 2024/25 to be realistic. By way of a comparison decommissioning, demolition and remediation to facilitate the redevelopment of Rugeley Power Station in Cannock Chase began in June 2016 and is expected to conclude in the Winter 2022.³⁵ It should also be noted that a specific date for demolition at Fiddlers Ferry has yet to be determined. Given the complexity and cost implications of the above, viability and overall deliverability will be more challenging which could dissuade many potential delivery partners.
- **Planning timeframes are tight:** The Masterplan Briefing Note estimates outline planning permission to be granted in 2023 for Phase 1 (which includes the employment land alongside a minimum of 860 homes) and the granting of reserved matters by 2024/25. Again this timeframe appears overly optimistic given the complexities of the site mentioned above and the lack of a delivery partner. By way of a comparison, the Fawley Power Station in New Forest, was only granted outline planning permission in July 2020 following detailed negotiations with New Forest District Council and The New Forest National Park Authority, over a period of 5 years³⁶. WBC's Local Development Scheme (LDS), published in September 2021, expects the Local Plan to be adopted in July 2023, while the Masterplan Briefing Note expects outline planning permission for

³³ <https://www.ssethermal.com/flexible-generation/decommissioned/fiddler-s-ferry/>

³⁴ EDNA (2021)

³⁵ <https://www.business-live.co.uk/economic-development/energy-giant-engie-progress-development-20759255>;

<https://www.engie.co.uk/about-engie/news/engie-gets-the-green-light-for-rugeley-redevelopment/>

³⁶ <http://news.fawleywaterside.co.uk/outlinepermission/>

Phase 1 to also be granted in 2023. With the current lack of a delivery partner, it seems unlikely that planning permission would be granted in the same year that the new Local Plan will be adopted (and therefore when the site becomes officially allocated).

- Significant enabling infrastructure:** The first phase of the proposed development (which includes the employment land) is to be supported by new junction connections to the A562 which will separate employment and residential traffic into the site and ease traffic flow. A range of community and green infrastructure is also being promoted to support the wider scheme. Somewhat strangely the Masterplan Briefing Note appears to assume, without any evidence, that Phase 1 can progress within the capacity of the existing transport infrastructure with potentially minor improvements to junctions east and west of the site access on the A562. Phase 2 on the other hand is mentioned as requiring consultations with Highways England. From our experience approvals from Highways England and a funding and delivery package will need to be agreed upfront for the entire project rather than the piecemeal approach that appears to be suggested. The cost of the entire enabling works will have a bearing on the deliverability of the entire package and whether external funding is needed which should also be factored into the wider timeframes of the project. The EDNA (2021) acknowledges that the employment development will likely be reliant, at least in part, on the delivery of housing on the part of the site that sits within the Green Belt. Therefore, this part of the site would need to be released from the Green Belt to provide housing, which in turn, would support the delivery of employment floorspace. In contrast, the proposed employment floorspace at the Subject Site does not rely on the delivery of housing and is to be taken forward by an experienced I&L developer in St Modwen.
- Unrealistic build out rate:** Construction of Phase 1 is expected to begin in 2024/25, with the employment floorspace delivered and fully occupied by 2030, indicating a construction period of around 5 to 6 years. In contrast, the employment land at Rugeley Power Station is expected to be delivered over a period of 20 years³⁷, while indicative phasing of the redevelopment scheme for Fawley Power Station shows the proposed employment being delivered over a period of 13 years³⁸. It should also be noted that these sites are much smaller than Fiddlers Ferry, with Rugeley being 6.2 ha³⁹ and Fawley 47 ha⁴⁰. In order to deliver the proposed 4 million sqft of I&L floorspace over the 5 to 6 years period envisaged in the Masterplan Briefing Note a build out rate of circa 800,000 sqft per annum is required. This is not considered realistic as a baseline assumption for a site without a delivery partner and with significant demolition, remediation and enabling infrastructure requirements. In **Table 7.4** below we outline the build out rates of a number of I&L developments which demonstrates 250,000 to 350,000 sqft per annum is a more realistic assumption. At these levels the 4 million sqft proposed for Fiddlers Ferry would take 12 to 16 years to build.

Table 7.4 I&L Scheme Build Out Rates

| Year | Scheme | Greenfield/Brownfield | Submarket | Tenant | Total Sq.ft Leased | Ave. p.a. Take up (sq.ft) |
|------|------------------------|-----------------------|--------------|-----------|--------------------|---------------------------|
| 2011 | Kingsway Business Park | Greenfield | Rochdale Ind | JD Sports | 866,250 | |
| 2018 | Kingsway Business Park | Greenfield | Rochdale Ind | JD Sports | 349,837 | 152,011 |

³⁷ EIA - Planning ref: CH/19/201

³⁸ Design and Access Statement – Planning ref: 19/10581

³⁹ Planning Statement - Planning ref: CH/19/201

⁴⁰ Design and Access Statement – Planning ref: 19/10581

| | | | | | | |
|------|------------------|------------|---------------------|--|---------|---------|
| 2017 | Logistics North | Greenfield | Bolton Ind | Whistl Ltd | 225,031 | |
| 2017 | Logistics North | Greenfield | Bolton Ind | Amazon | 358,578 | |
| 2018 | Logistics North | Greenfield | Bolton Ind | MBDA UK | 175,087 | |
| 2020 | Logistics North | Greenfield | Bolton Ind | Sofology | 149,198 | |
| 2020 | Logistics North | Greenfield | Bolton Ind | DSG Retail Ltd | 375,170 | |
| 2016 | Logistics North | Greenfield | Bolton Ind | Lidl | 500,000 | 375,382 |
| 2014 | M6 Epic | Greenfield | Wigan Ind | Dole Fresh UK Ltd | 61,233 | |
| 2016 | M6 Epic | Greenfield | Wigan Ind | Poundland | 340,310 | |
| 2016 | M6 Epic | Greenfield | Wigan Ind | Bunzl Retail and Healthcare Supplies Ltd | 111,151 | |
| 2019 | M6 Epic | Greenfield | Wigan Ind | 3PL | 55,531 | 94,704 |
| 2014 | Omega | Greenfield | Warrington Core Ind | Plastic Omnium | 240,000 | |
| 2016 | Omega | Greenfield | Warrington Core Ind | Dominos | 117,000 | |
| 2016 | Omega | Greenfield | Warrington Core Ind | Amazon | 357,000 | |
| 2020 | Omega | Greenfield | Warrington Core Ind | Royal Mail | 91,247 | 119,296 |
| 2012 | Omega North | Greenfield | Knowsley Ind | Parcelforce | 72,600 | |
| 2013 | Omega North | Greenfield | Warrington Core Ind | Hermes Parcelnet Ltd | 153,589 | |
| 2013 | Omega North | Greenfield | Warrington Core Ind | Brakes Brothers | 198,334 | |
| 2014 | Omega North | Greenfield | Warrington Core Ind | Travis Perkins Plc | 630,438 | 351,654 |
| 2010 | Omega South | Greenfield | Warrington Core Ind | Royal Mail | 211,833 | |
| 2015 | Omega South | Greenfield | Warrington Core Ind | The Hut Group | 686,000 | |
| 2018 | Omega South | Greenfield | Warrington Core Ind | Royal Mail | 347,958 | |
| 2020 | Omega South | Greenfield | Warrington Core Ind | Jungheinrich | 184,537 | 133,054 |
| 2019 | Omega Warrington | Greenfield | Warrington Core Ind | Eddie Stobart | 635,000 | |
| 2020 | Omega Warrington | Greenfield | Warrington Core Ind | TJ Morris (t/a Home Bargains) | 860,000 | 430,000 |

Source: Savills

- Not a prime location:** Prime locations for I&L include sites adjacent to motorway junctions such as the Subject Site. Fiddlers Ferry on the other hand is 14 km away (via the A57) from the nearest motorway, which is the M62. This may impact the pace of delivery Fiddlers Ferry could achieve. A key driver of quicker build out rates is larger units for regional and national occupiers. If we look at the employment areas nearby to Fiddlers Ferry (**Figure 7.3**), it can be seen that all leases (net absorption) signed over the last 5 years have been for units of less than 100,000 sqft (ie the small and mid-box size bands) (**Figure 7.4**). There have been no leases signed for large units above

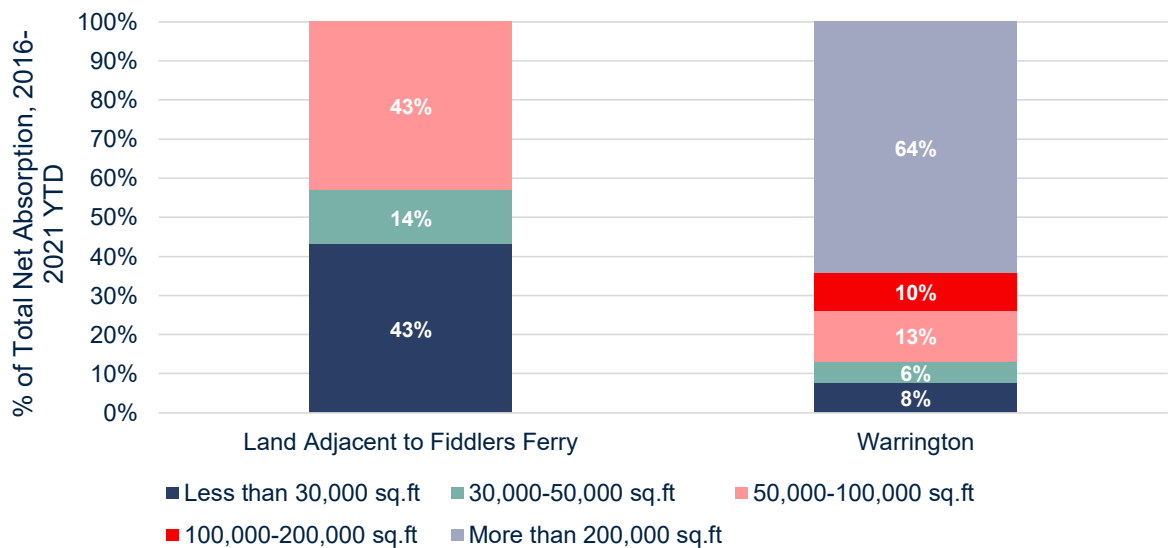
100,000 sqft nor very large units above 200,000 sqft. This is in direct contrast to Warrington generally where 64% of recent leases have been for units above 200,000 sqft. While we appreciate the Gorse Point scheme will deliver some new larger units above 200,000 sqft, the area around Fiddlers Ferry caters primarily to smaller and mid-box units due to it not being located on a motorway. While it is important Fiddlers Ferry caters for these segments of the market, smaller occupiers typically have lower covenant strength which can impact build out rates as they don't generally sign prelets and are less able to contribute to strategic enabling infrastructure.

Figure 7.3 I&L Market Area Adjacent to Fiddlers Ferry



Source: Savills; CoStar (2021)

Figure 7.4 Net Absorption by Size Band, 2016-2021 YTD



Source: Savills; CoStar (2021)

7.2.29 Based on the above analysis we do not consider the Masterplan Briefing Note's conclusion that the employment elements of the Fiddlers Ferry site can be delivered by 2031. In fact we consider the full delivery of the employment land to be challenging by the end of the plan period in 2038. To further illustrate this point we compare what Savills consider to be realistic timings with those outlined in the Masterplan Briefing Note. This comparison is detailed in **Table 7.5** below.

Table 7.5 Delivery Timeframe Comparisons

| | Masterplan Briefing Note | Savills | Notes |
|---|--------------------------|---------|---|
| Warrington Local Plan Adoption | 2022/2023 | 2023 | According to WBC's Local Development Scheme (2021) the Warrington Local Plan is currently earmarked for adoption in July 2023. |
| Delivery Partner(2) | Not addressed | 2025 | As discussed above finding a delivery partner(s) can take time if following a competitive process. There will may be different deliver partners for the residential and employment elements. |
| Phase 1 Outline Planning Application | 2023 | 2027 | The Masterplan Briefing Note appears to assume Outline Planning Permission will be delivered conjunction with the adoption of the Local Plan. We do not believe most delivery partners would invest the considerable resources necessary to promote the site and undertake the various technical studies to support a planning application without the site's allocation being confirmed following EIP. We therefore consider it prudent to assume preparation and submission of planning application and Council determination period to follow the Local Plan adoption. |
| Phase 1 Reserve Matters and Construction Start | 2024/25 | 2028 | We consider a one year period for preparation of the Reserve Matters Applications and Council determination period to be realistic. |
| Highways Site Access Works | 2024/25 | 2030 | Given the lack of detailed information currently available we consider it too optimistic to assume enabling infrastructure works will happen following the grant of outline planning permission. Any necessary Highway England permissions are likely to take time. Viability changes may also arise given the need for upfront |

| | | | |
|--|-----------|-----------|---|
| | | | infrastructure funding, potentially requiring external funding. The site will also need to be demolished and remediated which most delivery partners will only likely fund once planning permission has been obtained. |
| Employment Build Out & Occupied | 2023-2030 | 2031-2044 | As discussed above we consider a 12 to 16 year build out period to be more realistic based on actual deliver rates. Sites directly on the motorway, such as the Subject Site, could achieve higher deliver rates given their added attractiveness to occupiers. |

Source: Savills; Fiddlers Ferry Masterplan Briefing Note (2021)

7.2.30 Based on the above analysis, Savills considers around 50% of the 101 ha of employment land within Fiddlers Ferry to be deliverable within the Local Plan period to 2038. The Masterplan Briefing Note underestimates the lead in and delivery timeframes for bringing forward large scale and complex brownfield sites. In our view approximately 50 ha (gross) to 2038, not the 101 ha currently included in UPSVLP (2021) would be a more realistic delivery rate within the Plan period. Even if delivery is accelerated and all of the development was delivered in the Plan period, which we don't consider to be realistic for the previously stated reasons, there is still a significant need for I&L development in Warrington.

Option Five: Port Warrington

7.2.31 Port Warrington comprises the development of a tri-modal port facility adjacent to the Manchester Ship Canal and the West Coast Mainline by Peel L&P⁴¹.

7.2.32 The site is relatively disconnected from the rest of Warrington, not being located near a motorway junction.

7.2.33 WBC notes that development at Port Warrington is dependent on the proposed Western Link, a new access road to connect the site to the Western Link and associated public transport improvements⁴². The development could however have a significant impact on the Western Link. Trips generated from the development are likely to push traffic back into the town centre and inner Warrington, offsetting one of the key intended benefits of the Western Link in reducing congestion in these areas and freeing up substantial brownfield development capacity⁴³.

7.2.34 Being a multi-modal facility focused on a port, Port Warrington may not necessarily cater to demand from traditional I&L occupiers who rely on good road connections, making it difficult to ascertain the scale of demand that this development could generate⁴⁴. The EDNA (2021) also notes that the development would represent a relatively small multi-modal facility (60 ha), when similar facilities are usually within the range of 100 ha to 150 ha.

⁴¹ <https://www.oceangateway.co.uk/projects/port-warrington/>

⁴² WBC Updated Proposed Submission Version Local Plan Additional Site Assessment Proformas (2021)

⁴³ Ibid

⁴⁴ EDNA (2021)

- 7.2.35 There are also potential abnormal development costs including dealing with potentially contaminated land, access to the Western Link, Port Berth Expansion and rail link connection⁴⁵.
- 7.2.36 Finally, it is not expected that Port Warrington will be delivered within the Plan period, being a long-term project for Peel⁴⁶.
- 7.2.37 Based on the above, Savills do not consider the Port Warrington site to be as attractive to I&L occupiers compared to the Subject Site nor as deliverable in the short to medium term.

Option Seven: Warrington Commercial Park

- 7.2.38 The Commercial Park would comprise an industrial estate of more mixed large and small/medium industrial and commercial uses⁴⁷.
- 7.2.39 The site is not located near a motorway and so is envisioned to serve Warrington Town and benefits from links to existing and proposed facilities in the Southern Gateway area⁴⁸. The EDNA (2021) notes that it could usefully provide smaller business space to offset the focus on strategic B2/B8 options elsewhere.
- 7.2.40 The development of the site is dependent on the delivery of the Western Link Road, and so is unlikely to be brought forward until later in the Plan period⁴⁹.
- 7.2.41 Given the site being further removed from the SRN and its reliance on the delivery of the Western Link, Savills do not consider the Warrington Commercial Park site to be as attractive to I&L occupiers compared to the Subject Site nor as deliverable in the short to medium term.

7.3 Conclusion

- 7.3.1 This section reviewed WBC's existing supply which has reduced from 37.72 ha in March 2021 to just 29.99 ha as of October 2021.
- 7.3.2 Savills considers that the proposed South East Warrington Employment Area allocation (Option 1 and 2) has the potential to be appropriate for meeting future I&L demand. Based on our analysis we feel the estimated delivery timescales for Fiddlers Ferry are too ambitious. We consider 50% of the employment allocation (circa 50ha) as more realistic to come forward within the Plan period.
- 7.3.3 Of the remaining allocation options, the Subject Site is considered the most attractive and deliverable in helping to meet the Savills shortfall of 195.49 ha which increases to 246.49 ha if only 50% of the proposed Fiddlers Ferry employment land comes forward within the Plan period as we suggest.

⁴⁵ WBC Updated Proposed Submission Version Local Plan Additional Site Assessment Proformas (2021)

⁴⁶ EDNA (2021)

⁴⁷ Ibid

⁴⁸ Ibid

⁴⁹ EDNA (2021)

8 Economic Benefits & Social Value

8.1 Introduction

- 8.1.1 This section provides an overview of the economic benefits and social value which could be generated from the Proposed Development.
- 8.1.2 In terms of economic benefits the scheme would generate new employment during the construction and operational stages. It would also generate net additional Gross Value Added (GVA), private incomes for workers, and revenues for WBC through business rates.
- 8.1.3 In relation to social value, the Proposed Development would help to create apprenticeships, NHS savings from any reduction in unemployment, and support local businesses through local procurement during the construction stage.

8.1 Approach

- 8.1.1 In estimating the economic benefits and social value generated from the Proposed Development, we have assumed that 20% of the 1.25 million sq.ft (115,920 sqm) proposed floorspace will be for industrial use (B2) and 80% for warehousing use (B8) , as shown in **Table 8.1**. Obviously we cannot be certain exactly which companies will occupy the new units once build, however we consider our split to be realistic based on current market trends.

Table 8.1 Assumed Land Use Split of Proposed Development

| Use | Floorspace (GIA) |
|--------------|--------------------|
| Industrial | 23,184 sqm |
| Warehouse | 92,736 sqm |
| Total | 115,920 sqm |

Source: Savills (2021); St Modwen

8.2 Economic Benefits

- 8.2.1 The economic benefits we estimate include construction jobs, operational jobs, GVA, types of occupations found in the I&L sector and their typical wages, and business rates. The Subject Site currently does not generate any employment.

Construction Jobs

- 8.2.2 To estimate on-site employment during the construction stage, we divide the total construction cost⁵⁰ by the average employee turnover in the construction sector in the North West⁵¹.
- 8.2.3 The construction phase would generate **166 on-site construction jobs per annum** over the assumed 7 year construction period. This is referred to as the gross direct employment and refers to the number of workers onsite, on average, throughout the construction period.

⁵⁰ Estimated using BCIS Average Prices Calculator, rebased to North West region

⁵¹ Department for Business, Innovation and Skills (2018-2020) Business Population Estimates, Table 12

8.2.4 We assess the construction phase employment impact at the WBC level based on commuting patterns. We assume a rate of leakage⁵² to workers from outside of WBC to be 41%⁵³. We account for displacement (15%)⁵⁴ and multiplier effects⁵⁵ of 2.05 (which helps to estimate offsite jobs as part of the Proposed Development's wider construction supply chain). We estimate that during the assumed 7-year construction phase the Proposed Development would generate **171 net additional on- and off-site construction jobs per annum** which are expected to benefit WBC residents.

8.2.5 **Table 8.2** below shows the total number of construction jobs generated by the Proposed Development.

Table 8.2 Construction Jobs per Annum (over 7-year construction phase)

| Construction Jobs per Annum | |
|--|------------|
| Construction Jobs On-Site (Gross) | 166 |
| <i>Leakage (41%)</i> | -68 |
| On-site Construction Jobs for WBC Residents | 98 |
| <i>Displacement (15%)</i> | -15 |
| <i>Multiplier (2.05)</i> | 87 |
| Net Additional On-Site and Off-Site Construction Jobs for WBC Residents | 171 |

Source: Savills (2021); due to rounding, numbers presented may not add up precisely to totals provided

Operational Jobs & GVA

8.2.6 To estimate the operational on-site jobs generated we use the HCA's Employment Density Guide (2015) and apply those densities to the mix of uses assumed above in **Table 8.1** above.

8.2.7 **Table 8.3** presents the relevant HCA job density figures. Based on these figures the Proposed Development is estimated to accommodate **1,776 on-site jobs**. This consists of 626 industrial jobs and 1,150 warehouse jobs as shown in **Figure 8.1**.

Table 8.3 Job Densities

| Use | Job Density |
|-------------------------|------------------------|
| Industrial | 36 sqm (GIA) per FTE |
| Warehouse ⁵⁶ | 82.5 sqm (GEA) per FTE |

Source: Savills (2021); HCA Employment Density Guide (2015)

⁵² Refer to the Glossary for definitions of leakage, displacement and multiplier impacts

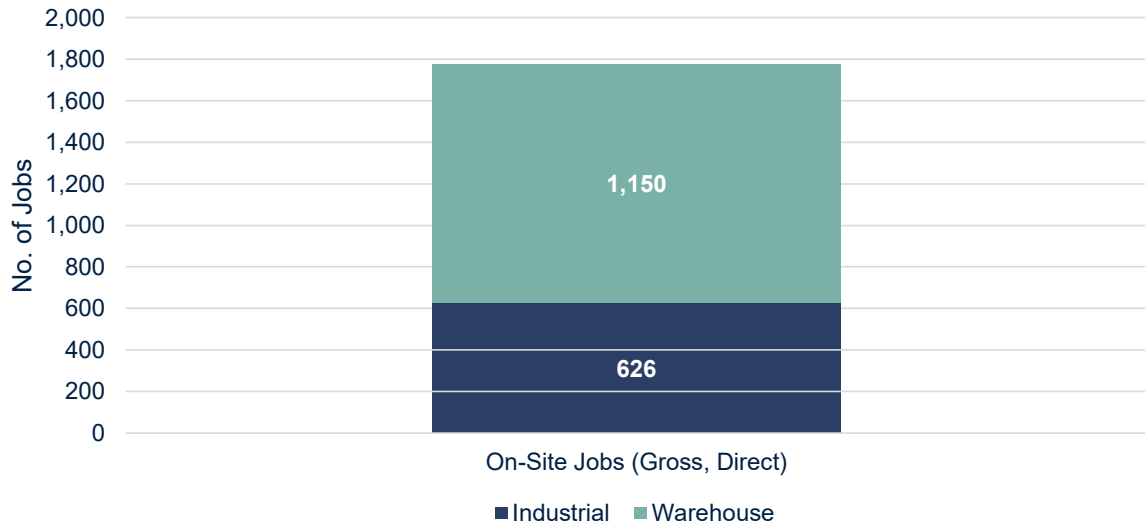
⁵³ Census (2011) Location of usual residence and place of work by sex

⁵⁴ Construction Skills Network forecasts 2017-2021 – West Midlands, Construction Industry Training Board (2017)

⁵⁵ UK Input-Output Analytical Tables, ONS (2017)

⁵⁶ Mid-point between 'Final Mile' Distribution Centre (70 sqm (GEA) per FTE) and National Distribution Centre (95 sqm (GEA) per FTE)

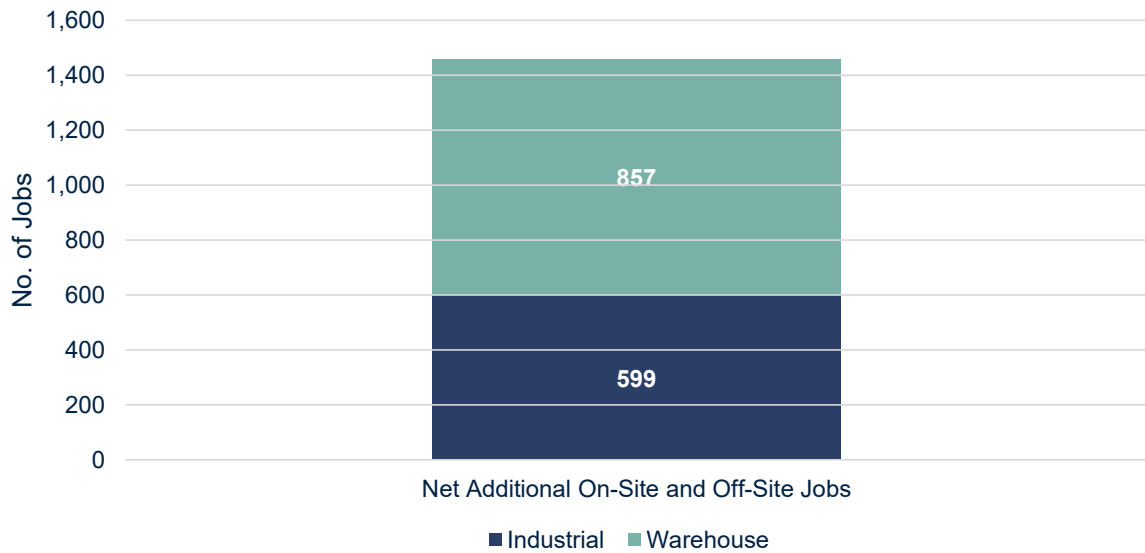
Figure 8.1 Gross On-Site Jobs



Source: Savills (2021)

8.2.8 When leakage, displacement and multiplier effects are taken into account, the Proposed Development is estimated to generate **1,457 on-site and off-site jobs** for WBC residents. **Table 8.4** and **Figure 8.2** present the results.

Figure 8.2 On-Site and Off-site Jobs



Source: Savills (2021)

Table 8.4 Operational Jobs

| Operational Jobs | |
|---|--------------|
| Industrial | 626 |
| Warehouse | 1,150 |
| On-site Jobs (Gross) | 1,776 |
| <i>Leakage (41%)</i> | -728 |
| On-site Operational Jobs for WBC Residents | 1,048 |
| <i>Displacement (5%)</i> | -52 |
| <i>Multiplier (1.33 (Industrial); 1.71 (Warehouse))</i> | 461 |
| Net Additional (On-Site and Off-Site) Operational Jobs for WBC Residents | 1,457 |

Source: Savills (2021); due to rounding, numbers presented may not add up precisely to totals provided

8.2.9 Gross Value Added (GVA) is a key indicator of economic productivity. It measures the contribution of a development to the economy. We have based the analysis on the GVA generated per worker in the North West for industrial and warehousing uses.⁵⁷ Using the operational job estimates from **Table 8.4**, the Proposed Development will generate net additional GVA benefits of **£97.1 million**.

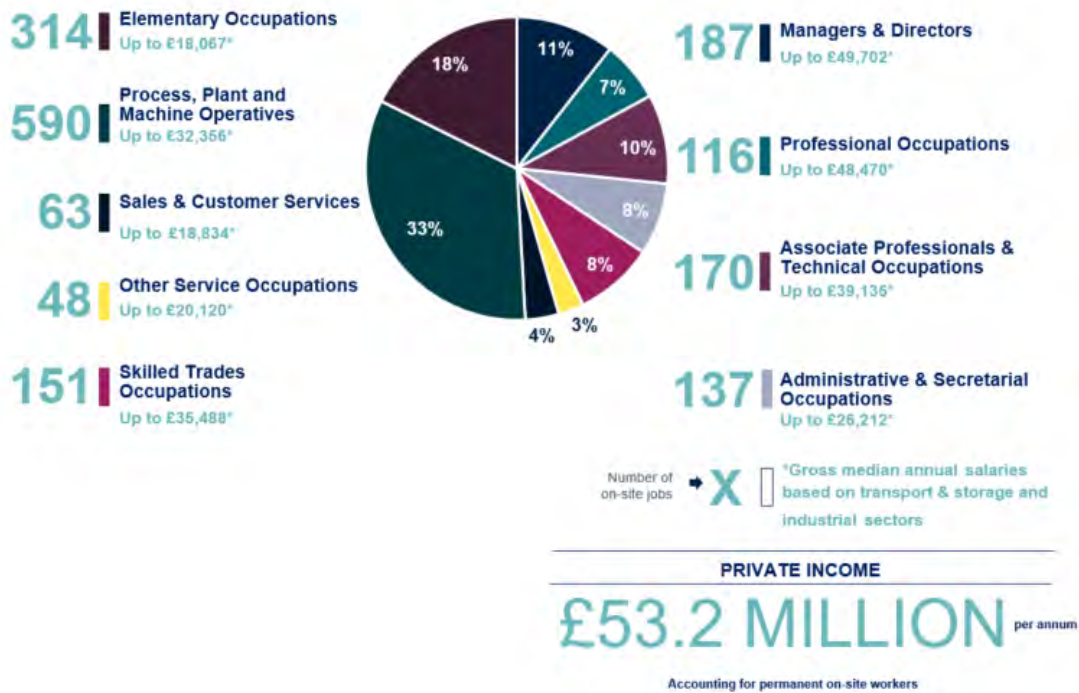
Occupation and Wage Profiles of On-Site Jobs

8.2.10 We can estimate the mix of occupations that could be generated on-site (gross) by the Proposed Development, and the wages associated with these occupations.

8.2.11 **Figure 8.3** presents the results.

⁵⁷ ONS (2019) Region by Industry Labour Productivity: Output Per Job; due to rounding, numbers presented may not add up precisely to totals provided

Figure 8.3 On-Site Jobs - Occupational and Wage Profile



Source: Savills (2021); ONS (2020) Occupation (SOC10) by Industry (SIC2007) by Region (GOR9D); ASHE (2020) SIC2007 Table 5.7a Annual pay -Gross (£) -For full-time employee jobs: North West; ASHE (2020) Table 3.7a Annual pay -Gross (£) -For all employee jobs: North West

8.2.12 Overall, the Proposed Development is expected to generate a total private income for on-site workers of **£53.2 million per annum**.

Business Rates

8.2.13 To estimate the value of business rates expected to be generated by the Proposed Development, we use the rateable values of similar non-domestic premises in close proximity to the Proposed Development.

8.2.14 Based on this analysis the Proposed Development is expected to generate business rates of **£2.5 million per annum**. We assume that 49% of the total business rate revenues would be retained by WBC⁵⁸, which equates to **£1.2 million per annum**.

8.3 Social Value

8.3.1 **Table 8.5** presents the estimated social value of the Proposed Development covering apprenticeships, careers advice, NHS savings from people in employment, upskilling, and supporting local businesses.

8.3.2 We primarily use CITB’s and the National Skills Academy for Construction (NASfc) Client Based Approach to Developing and Implementing an Employment and Skills Strategy on Construction Projects (2016) as well as the National Social Value Measurement Framework to estimate social value.

⁵⁸ MHCLG (2021) 2021-22 Business Rates Levy and Safety Net Calculator

Table 8.5 Estimated Social Value Expected to be Generated from Proposed Development

| Apprenticeships | Construction Careers Information, Advice & Guidance Events | NHS Savings from Unemployment Reduction |
|---|--|--|
| £115,200 | £30,000 | £186,800 |
| Estimated social value of apprenticeships (11) delivered during the construction period (7 years) | Estimated total social value of Construction Careers Information, Advice & Guidance Events (6 events) | Estimated NHS savings assuming that expenditure on unemployed persons is double the average NHS expenditure during the construction period (7 years) ⁵⁹ |
| Qualifying the Workforce | Supporting Local Businesses | Total Social Value |
| £310,600 | £30.4 million | £31 million |
| Estimated total social value of Qualifications achieved (equiv. NVQ2 or above) | Estimated total value of local procurement during the construction period assuming 20% of all monies spent locally ⁶⁰ | |

Source: Savills (2021)

8.4 Conclusion

8.4.1 **Table 8.6** summarises the above economic benefits and social value estimated to be generated by the Proposed Development.

Table 8.6 Summary of Economic Benefits and Social Value

| Economic Benefit/Social Value Metric | Value |
|--|---|
| <i>Economic Benefits</i> | |
| Net additional on-site and off-site construction jobs | 171 per annum over 7 year construction period |
| Net additional on-site and off-site operational jobs | 1,457 |
| Net additional GVA | £97.1 million per annum |
| Private income generated from gross on-site operational jobs | £53.2 million per annum |
| Business rates for WBC | £1.2 million per annum |
| <i>Social Value (over 7 year construction period)</i> | |
| Apprenticeships | £115,200 |

⁵⁹ Based on Oxford Economics Cost-benefit analysis for the Department for Work and Pensions (2010).

⁶⁰ WBC Planning Obligations SPD (2017)

| | |
|--|--------------------|
| Construction Careers Information, Advice & Guidance Events | £30,000 |
| NHS savings from unemployment reduction | £186,800 |
| Qualifying the workforce | £310,600 |
| Supporting local businesses | £30.4 million |
| Total social value | £31 million |

Source: Savills (2021)

9 Conclusion

- 9.1.1 The Subject Site is exceptionally well placed to cater for the strong market demand from I&L occupiers in Warrington and the wider FEMA, owing to its direct access from J21 of the M6. This is a critical factor for prospective I&L occupiers as it means they would have access to a wide customer base and pool of labour.
- 9.1.2 Warrington's I&L availability has been on a downwards trajectory since 2015 and is now below its market equilibrium level of 9% at only 5.4%. This indicates that the local market is supply-constrained. The wider FEMA is also supply constrained with an availability rate of just 3.8%. Available floorspace is especially tight in the large unit sizes above 100,000 sqft. The Subject Site, while attractive to all segments of the market, is particularly attractive to larger unit occupiers given its direct access to J21 of the M6.
- 9.1.3 The sizable employment area of 40.25 ha ensures scale, needed for the successful establishment of a new significant employment location in the East of Warrington.
- 9.1.4 In **Section 3**, we reviewed the Council's evidence base for employment needs and uncovered a number of deficiencies. Namely that:
- **The Look-back Period is Too Long**: the look-back period over which average take-up (demand) is calculated runs for 24 years from 1996 to 2020. This is far too long as it downplays the role of strong recent demand drivers. For example, it doesn't take into account the growth of e-commerce and other factors affecting demand for future I&L space such as the growth of UK freight and Brexit. It also includes the Global Financial Crisis (GFC) which further suppresses the EDNA's need estimates. We recommend a 10-year look-back period.
 - **EDNA Uses Completions rather than Net Absorption**: the use of completion trends rather than actual demand for floorspace – what Savills refer to as net absorption – downplays future demand. Development completions are a supply measure, not a demand measure. For completions to occur land needs to be allocated. By using this measure the EDNA has effectively used the planning system's ability to allocate land as a proxy for demand, rather than attempt to understand true market demand into the future.
 - **EDNA doesn't account for suppressed demand**: not accounting for suppressed demand in years when the market is below the 9% equilibrium level further reduced future demand estimations.
- 9.1.5 Our method for estimating future demand, detailed in **Section 6**, addressed these deficiencies and demonstrated that I&L land needs for Warrington far exceed its existing and planned employment land supply, with a **shortfall totalling 195.49 ha** over the plan period. As we detailed in **Section 7**, we only consider approximately half of the employment allocation within Fiddlers Ferry to be deliverable within the Plan Period. This increases the size of the Savills shortfall to **246.49 ha**.
- 9.1.6 The 40.25 ha of I&L land proposed at Junction 21 Birchwood (Subject Site) will contribute to reducing Savills estimated shortfall over the plan period. For this reason we recommend the Subject Site be allocated within the new Local Plan.
- 9.1.7 Finally, the Proposed Development is expected to generate economic benefits such as construction and

operational jobs, net additional GVA, private income from on-site jobs, and business rates for WBC. Social value will also be generated through the creation of apprenticeships, Construction Careers Information, Advice and Guidance events, NHS savings from a reduction in unemployment, qualifying the workforce and supporting local businesses.

10 Appendix A: I&L Growth Drivers

10.1 Introduction

- 10.1.1 This Appendix contextualises some of the key trends that have been driving growth in the I&L sector.
- 10.1.2 Logistics uses in particular have shown strong performance for a number of years, but the Covid-19 pandemic has exacerbated existing trends. This has driven demand up even further for logistics floorspace while adversely impacting others commercial sectors such as retail and offices.
- 10.1.3 The shift in habits we have been witnessing – first of all the extraordinary growth in online retailing – is likely to be structural rather than temporary, meaning that as the country’s population continues to grow, so will I&L floorspace need to support household consumption and other sectors of the economy.
- 10.1.4 The pandemic has also had a profound impact on the employment market, exposing a high number of jobs to the risk of being lost once Government support measures are withdrawn. The logistics sector, which is supporting increasingly diverse occupations can play a key role in Warrington’s post-Covid economic recovery by re-employing people whom have lost jobs in other sectors.

10.2 The I&L sector is a major contributor to the national economy

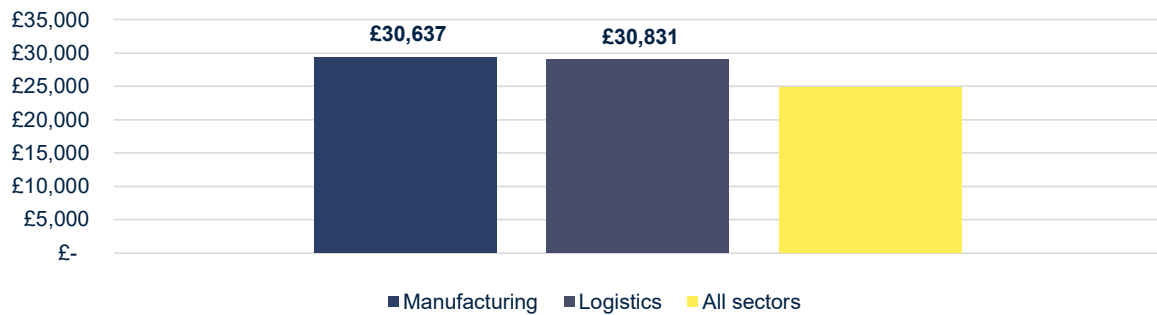
- 10.2.1 The I&L sector employs at least 3.4 million people in England, accounting for over a tenth of the country’s total employment (BRES ONS), and represents 14%, or £268 billion, of the total economy in GVA terms (ONS Annual Accounts).



Source: BRES, ONS, Oxford Economics Savills 2020

- 10.2.2 High level sector data on Jobs, GVA, Wages and Occupations mentioned in this report are generally sourced from ONS SIC 2007 Industrial Sections of *Manufacturing* and *Transport & Storage*. However, the wider supply chain of these activities goes beyond this strict classification of production and movements of goods, to include activities such as product design, research & development, and engineering, part of the professional services sectors. Therefore the jobs and GVA figures are an underestimate of the sector’s true impact.
- 10.2.3 Notwithstanding its importance in terms of Employment and GVA contribution, the sector is subject to a number of misconceptions about average pay levels, skills required and types of spaces provided.
- 10.2.4 Firstly, average pay is higher than average. As illustrated in **Figure 10.1**, data from ONS show wages above average at +£4,400 for Manufacturing and +£4,100 for Logistics.

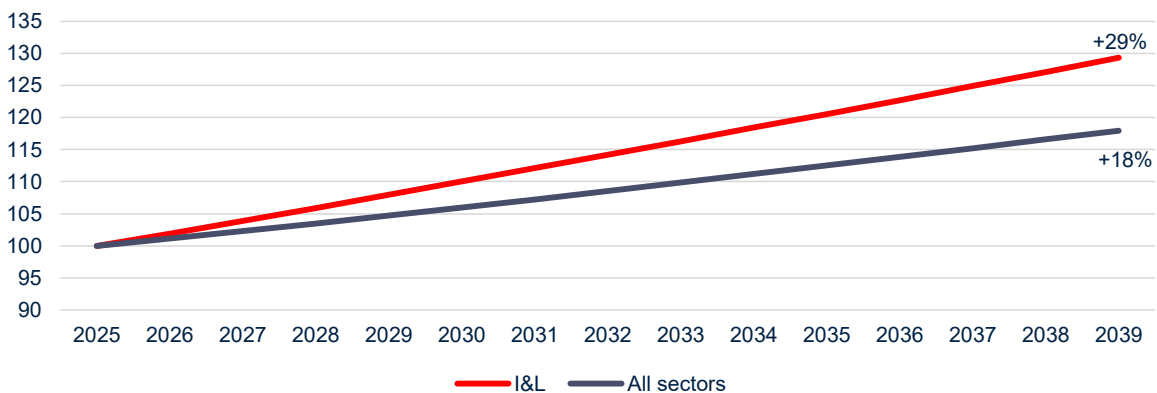
Figure 10.1 Median annual salary in the UK (2019)



Source: ASHE, Savills 2020

10.2.5 Secondly, I&L has a productivity of £58,000 of GVA per job, which is 12% higher than the average of all sectors. As shown in **Figure 10.2**, after 2025, productivity of I&L is expected to grow at a faster pace than the rest of the economy, increasing by 29% (vs 18%) over the 13-year period to 2039.

Figure 10.2 Growth in Productivity (GVA per job) in UK

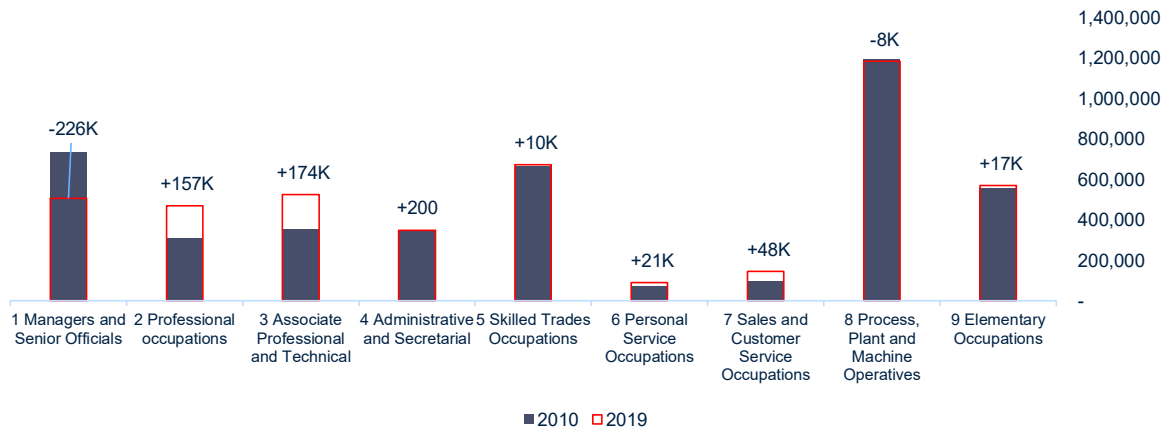


Source: Oxford Economics, Savills 2020

10.3 I&L jobs are becoming increasingly diverse

- 10.3.1 The sector is facing an era of unprecedented change. The past decade has seen the industry undergo a remarkable transformation, reshaping operating models and occupier requirements in ways that are only starting to become recognisable as an industry-wide phenomenon.
- 10.3.2 New technologies have significantly impacted the sector, changing the way tasks are performed and businesses operate. If on the one hand technology is replacing the most routine jobs through automation, self-driving vehicles and drone deliveries, it is also accelerating the shift towards a higher skilled labour force in the sector, effectively creating new roles and inducing an occupational shift.
- 10.3.3 **Figure 10.3** shows the change in the share of occupations in I&L in 2010 and 2019. While at the beginning of the decade we see a much more polarised distribution, with a higher share of managers at one end of the spectrum and more routine occupations at the other end, we now see a higher share of Professional and Associate Professional and Technical roles, which can be both associated with high-skilled engineering and technological professions. Similarly, there’s a slightly lower share of more routine occupations such as Process, Plant and Machine Operatives.

Figure 10.3 Occupational Distribution in Manufacturing, Transport & Storage



Source: ONS APS, Savills 2020

10.3.4 As manual and routine operations are replaced by machines, those same machines are programmed and controlled by engineers (Figure 10.4). This also implies a shift to higher wage employment opportunities, as engineers, programmers, data analysts and drone pilots become crucial.

Figure 10.4 Amazon technicians setting up a robot

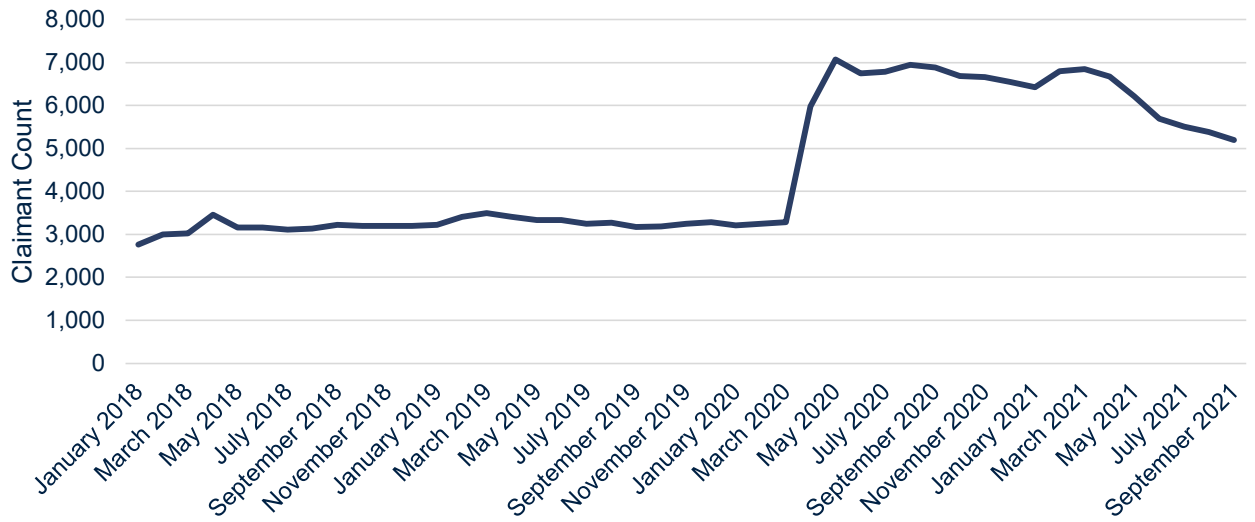


Source: Aboutamazon.com

10.4 I&L growth can replace job losses elsewhere in Warrington

- 10.4.1 The growth in I&L jobs and the diversity of occupations on offer will create opportunities for local people, including those who may lose their jobs in other sectors as a result of the Covid Pandemic.
- 10.4.2 The Government’s Coronavirus Job Retention Scheme (CJRS) has helped cushioning the impact of economic contraction on the job market, with the latest statistics released in October 2021 reporting 4,600 jobs furloughed (4.7% of total) in Warrington Borough.
- 10.4.3 However, in spite of this effort data on Claimant Count for Warrington Borough shows a rapid increase in the number of claimants (Figure 10.5). The Claimant Count measures the number of people claiming benefit principally for the reason of being unemployed. As of September 2021, the Count totalled 5,200.

Figure 10.5 Claimant Count in Warrington Borough (January 2018 – September 2021)



Source: Nomis 2021

10.5 Modern I&L premises are much more than just sheds

10.5.1 New production and storage spaces are being designed to be modern, technologically advanced (Figure 10.6), to meet high environmental standards and provide workers amenities (Figure 10.7).

Figure 10.6 The automated system operated by the ‘Ocado Smart Platform’



Source: ocadogroup.com

Figure 10.7 Gateway14 in Stowmarket with large landscaped areas



Source: ocadogroup.com

10.5.2 Office spaces are increasingly being collocated with production and logistics operations (**Figure 10.8**). This arises both as a consequence of occupational shifts and as a viability necessity given new office development is difficult to deliver in most locations due to high build costs.

Figure 10.8 Office space in a warehouse



Source: 299lighting.co.uk

10.5.3 As the sector becomes more technologically advanced and requires higher skilled workers such as data scientists and engineers, it is convenient for these people to be closer to the operations they control and analyse. This co-location is also more practical from a delivery point of view.

10.6 Current trends are providing a boost to I&L demand



10.6.1 The UK logistics market has traditionally been focused in and around the centre of the UK. This stems from the fact that retailers could locate their distribution warehouses here and reach a large proportion of the population within four-hour drive time.

10.6.2 This model evolved in the 1980s and 90s as the major supermarkets grew in size. It was also cost effective as the consumer, in the most part, would use a private vehicle to go to the store and then return home with their shopping.

10.6.3 With the onset of internet shopping however this model has become increasingly dated. Internet shopping relies on increased choice for the consumer and also increased delivery speeds to a location of people’s choosing. This means that more inventory is required to be located nearer to the general population.

10.6.4 This in turn has meant that more and more warehouse space is required both by online retailers such as Amazon and Ocado (**Figure 10.9**), but also traditional bricks and mortar retailers who are adapting their supply chains to compete.

Figure 10.9 Amazon Warehouse

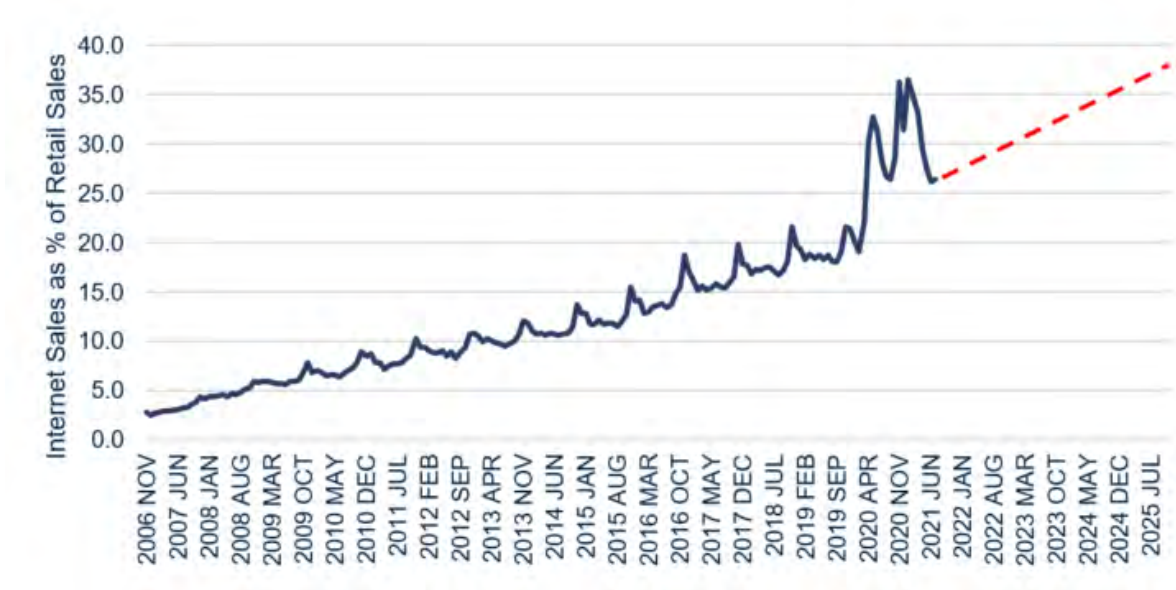
- 10.6.5 Over time the warehouse property market has expanded its geographical footprint and locations once considered unsuitable for warehouse development are now key markets. Key locational drivers for occupiers of warehouse space include proximity to markets as well as workforce, good accessibility to the strategic road network, but also, increasingly, the availability of energy.
- 10.6.6 Occupiers are more willing to locate in new areas where a good supply of labour is available as this often can lead to a competitive advantage. Other locational drivers also need to be in place such as edge of a settlement locations and close to a motorway or junction. Many of the locations that meet all of these criteria are located in the greenbelt meaning the aims of this designation need to be weighed against the I&L sector's key role in securing the nation's economic future.
- 10.6.7 A number of positive trends such as increasing on-line shopping, automation, restructuring of supply chains that were pre-dating the pandemic have now been accelerated by Covid-19 and looming Brexit. These trends are expected to increase demand for the UK logistics sector and its floorspace needs.

10.7 Covid has resulted in an exponential increase in online shopping

- 10.7.1 Online shopping, including grocery shopping, has been on the rise for over a decade due to digital innovations and changing consumer habits. Data from the ONS (**Figure 10.10**) shows that over the last decade internet sales have accounted for an increasing proportion of total retail sales, from around 6-7% in 2010 to around 20% in early 2020.
- 10.7.2 The Covid-19 pandemic and country-wide lockdown measures following the outbreak have accelerated the rise of online shopping. The most recent data shows the impact of the country-wide lockdown following the outbreak, with figures for September 2021 indicating that 25.9% of all retail sales have

been conducted online.

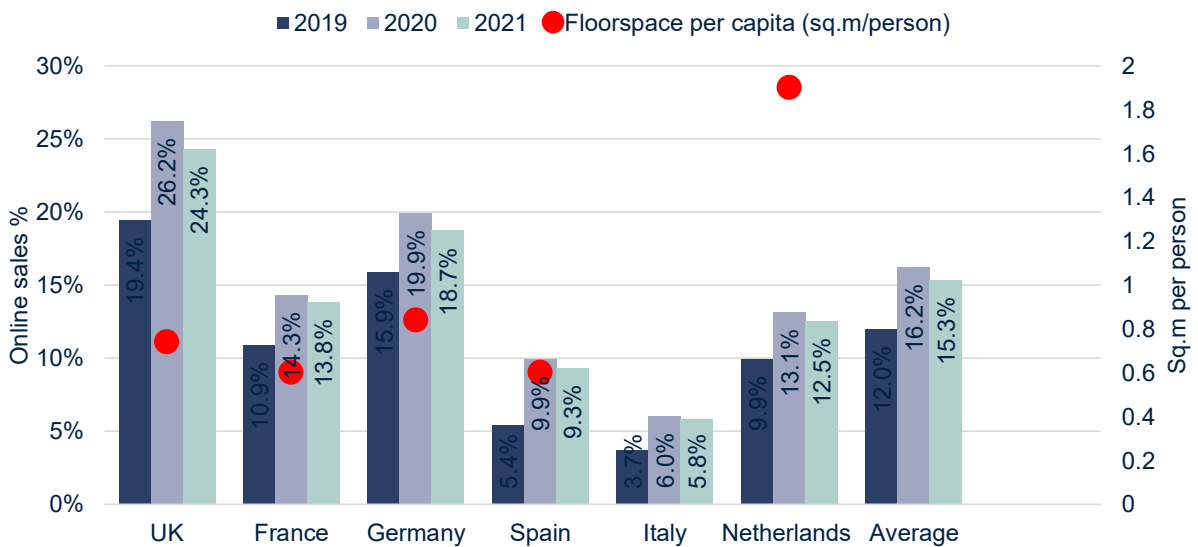
Figure 10.10 Internet sales as a percentage of total retail sales (UK)



Source: ONS, Retail Sales Index Time Series, Savills 2021; Forrester Research

10.7.3 Most commentators agree that online retailing will continue to grow from a higher base than before the pandemic. Forrester Research are a respected source of future online retail projections. As shown in Figure 9.10, they estimate online retail will continue to grow but from higher base into the future at 32% in 2022 and steadily growing to 37% in 2025.

Figure 10.11 Online retail sales as a percentage of total, Europe



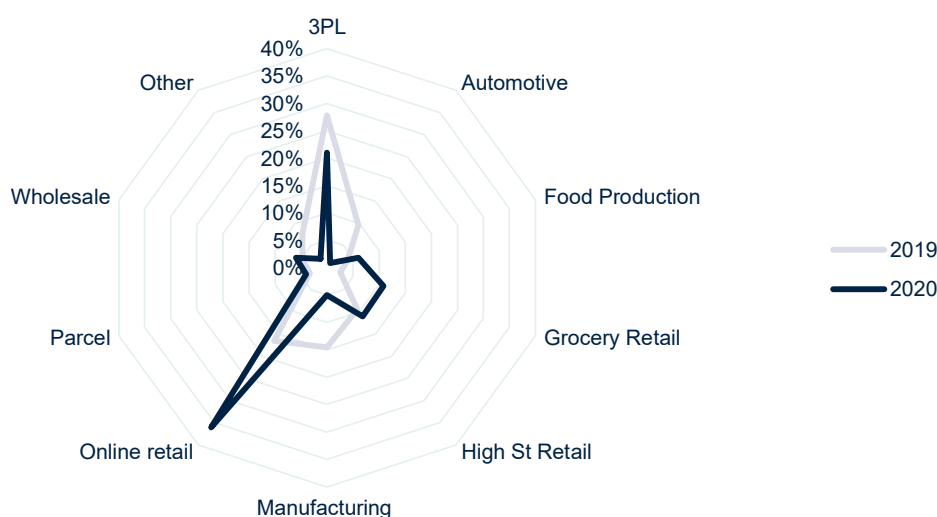
Source: Savills research, Centre for Retail Research

10.7.4 Also of interest, with reference to **Figure 10.11**, is that the UK has a lower level of I&L floorspace per capita compared to a number of European countries such as Germany and Netherlands despite having much higher levels of online sales. This indicates that further floorspace growth is likely in response to

the recent increase in online sales in the UK. Also given the UK is more density populated with tighter available land compared to much of Europe, it is even more important to adequately plan for the future availability of sufficient industrial land.

10.7.5 Illustrated in **Figure 10.12**, Savills’ research on the UK logistics market found that in 2020, 36% of space transacted has been from online retailers. 3PL’s have accounted for a further 21% of space transacted followed by Grocery Retailers and High Street Retailers accounting for 11% of take-up each. 29% of the total take-up has been from Amazon.

Figure 10.12 3PLs were dominant in 2019, online retailers are leading in 2020



Source: Savills 2020

10.7.6 In parallel to the rise in online shopping, consumers expectations for same-day or next day delivery are reshaping operating models of logistics companies. This is expected to increase demand for logistics space away from brick-and-mortar shops as reduced delivery times are expected to benefit online retailers.⁶¹

10.7.7 Research⁶² has suggested that e-commerce requires around 3 times the logistics space of traditional brick-and-mortar retailers (**Figure 10.13**). The decline of bricks-and-mortar shops is likely to be accelerated by the pandemic, having a negative impact on warehouse floorspace demand. However, we expect this is going to be more than counter-balanced by the sustained growth in online sales which have a higher space requirement than traditional retail.

10.7.8 Analysing the impacts of the Covid-19 pandemic, recent research by Knight Frank⁶³ estimates that every additional £1bn of online sales leads to a demand for 1.36m sqft of logistics space. Using forecasts of online sales, this research also concludes that by 2024 an additional 92m sqft of warehouse space

⁶¹ McKinsey & Company (2014), Same-day delivery: The next evolutionary step in parcel logistics
⁶² Prologis (2016), Global E-Commerce Impact on Logistics Real Estate. Online Article: <https://www.prologis.com/about/logistics-industry-research/global-e-commerce-impact-logistics-real-estate>
⁶³ Knight Frank (2020) How will rising online sales volumes impact on demand for distribution and logistics space? Online article: <https://www.knightfrank.co.uk/research/london-report/2020-10-07-how-will-rising-online-sales-volumes-impact-on-demand-for-distribution-and-logistics-space>

will be required, across the UK, to meet the demands of the online retail sector alone.

Figure 10.13 E-commerce has 3 times the space requirement of traditional retail

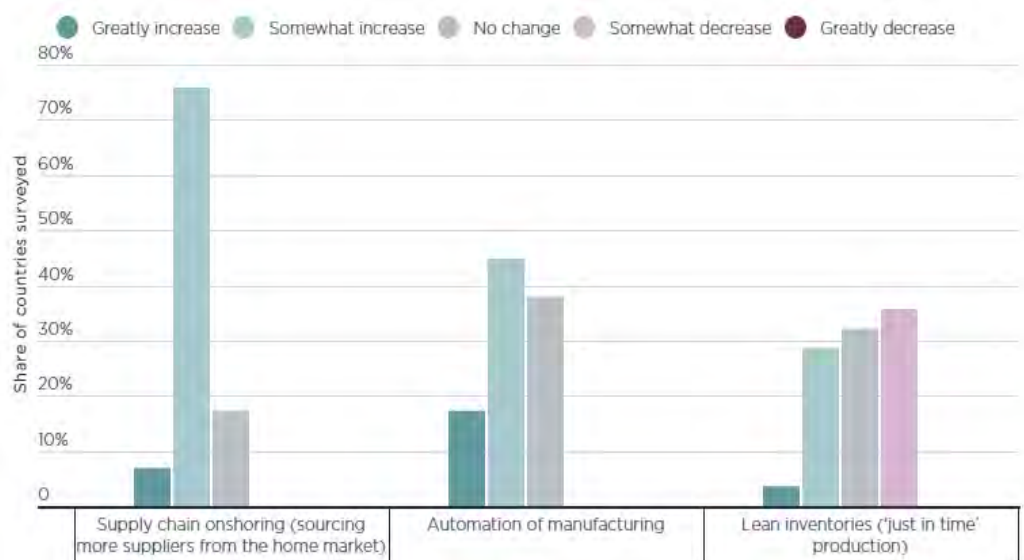


10.8 Potential supply chain shocks have created a focus on near-shoring/re-shoring

- 10.8.1 Covid-19 has also highlighted the level of interconnectedness of existing international supply chains and their fragility when one or more links break. Companies have started building up greater resilience in their operating models and are preparing to minimise future supply-chain-induced disruptions. This is expected to accelerate near-shoring or re-shoring trends, which 20% of firms are planning to do or have already started, according to a survey carried out in July 2020 by the Institute for Supply Management.
- 10.8.2 This is likely to lead to higher domestic inventory requirements, further increasing long-term demand for warehousing and logistics space. Surveys⁶⁴ carried out by Savills also suggest that it is widely expected that Covid-19 will 'Somewhat Increase' supply-chain on-shoring (**Figure 10.14**).

⁶⁴ Savills (2020) The impact of Covid-19 on Real Estate. Online Article: <https://www.savills.com/impacts/market-trends/the-impact-of-covid-19-on-real-estate.html>

Figure 10.14 Impact of Covid-19 on supply chains and manufacturing after pandemic has passed



Source: Savills Research 2020

- 10.8.3 Brexit is likely to add uncertainty surrounding the strength of the supply chains, influencing the need for further logistics space. If, in the short term, companies adopt nearshoring policies to insulate themselves from future supply chain disruption, it is likely that European manufacturing will increase which in turn will create a ripple effect for warehouse demand.
- 10.8.4 The additional requirements to import and export goods could lead to significant delays in Southern ports in the UK, and freight could potentially be redirected through Northern airports and harbours with spare capacity.⁶⁵ This would put pressure on local logistics space markets and require the development of more floorspace in those areas, and more generally along transport routes.

| Near-shoring definition | Re-shoring definition |
|--|---|
| Transferring a business operations to a nearby country as opposed to a more distant one (i.e. off-shoring) | Moving a business that had gone overseas back to the country from which it had originally relocated |

10.9 Increased stockpiling as a means to strengthen supply chains

- 10.9.1 The cumulative impacts of online shopping, Covid-19 and Brexit could potentially lead to shifts in demand and occupancy, due to higher levels of stockpiling.⁶⁶
- 10.9.2 With Covid-19, temporary shortages have led to stockpiling (**Figure 10.15**), a phenomenon already initiated by Brexit and the uncertainty around future international trade agreements. To strengthen supply chains, and prepare for any interruption in the flow of goods or ensure that delivery times can be maintained, some businesses might stockpile their inventory, mainly in sectors where little spare stock

⁶⁵ Duncan T. (2019), Brexit Effects on Logistics. Online Article: <https://www.propertyweek.com/insight/brexit-effect-on-logistics/5105162.article>

⁶⁶ Hatmill (2020), Will a post covid-19 supply chain generate different property requirements? – Online article

was held before the pandemic.⁶⁷

Figure 10.15 Supermarkets ask shoppers to be ‘considerate’ and stop stockpiling



Source: BBC.com

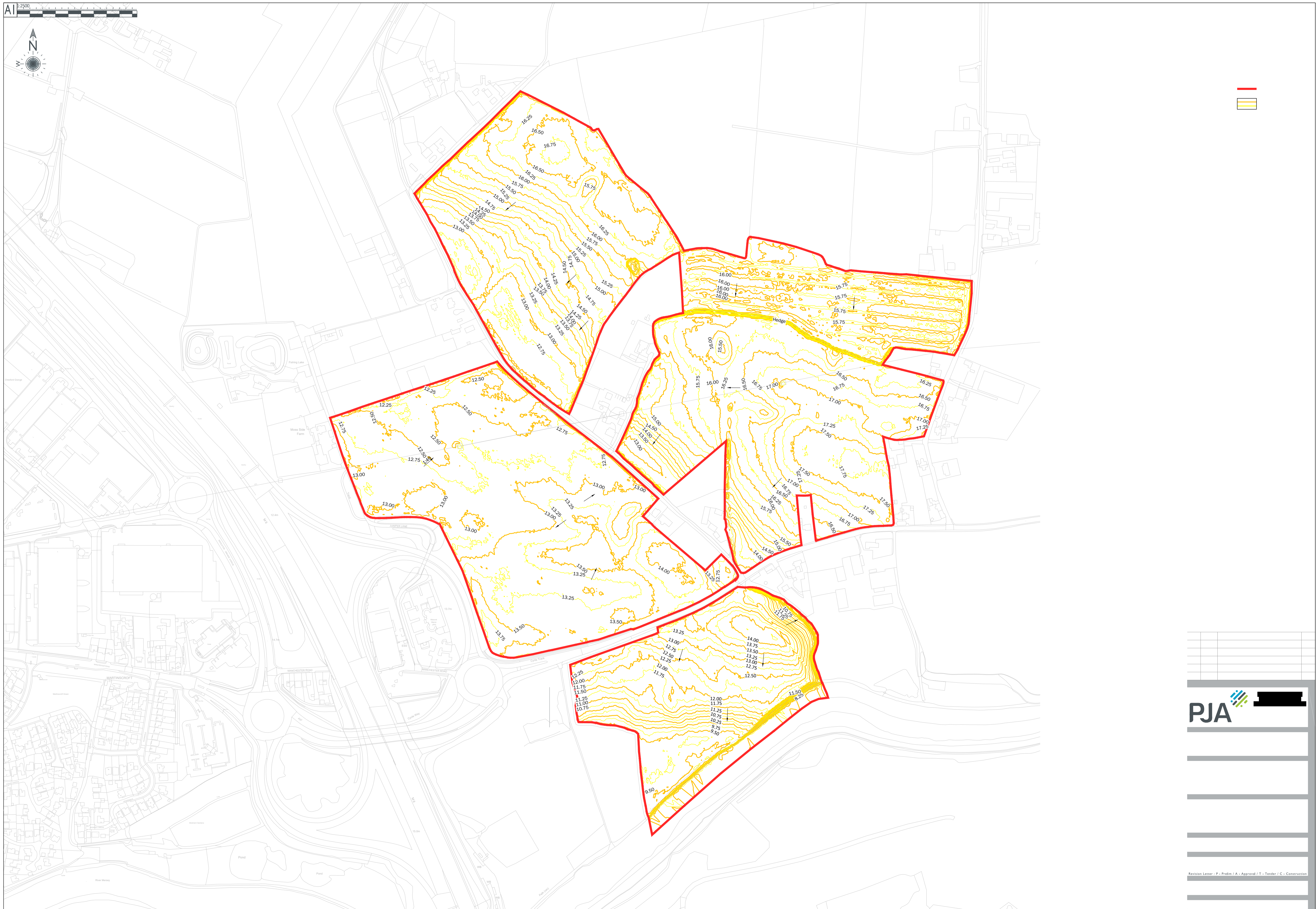
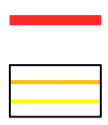
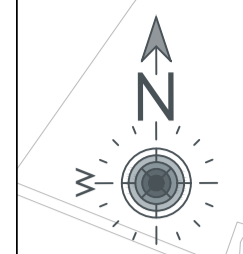
- 10.9.3 While this can be regarded as a short-term demand factor, it may also have long-term implications as, for example, businesses may find it too risky to have a single warehouse serving their customer base compared to a multiple stocking solution. Therefore, instead of concentrating in one location, some firms might seek to spread their inventory over different regions, but in smaller spaces.
- 10.9.4 This could for instance be the case of a British firm spreading its stocks between its production in England and its customers in the EU⁶⁸ – and vice versa – or a firm seeking to reduce delivery time to various locations throughout England.

⁶⁷ Prologis (2020) COVID-19 Special Report #5: Supply Chain Shifts Poised to Generate Substantial New Demand. Online article

⁶⁸ Watson, S (2019) Brexit and the logistics Market. Online article: <https://www.perenews.com/brexit-logistics-market/>



APPENDIX E
CONTOURS PLAN





APPENDIX F
DRAINAGE STRATEGY

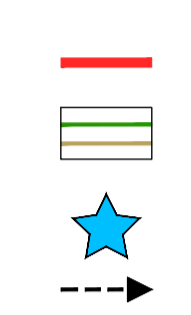


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Parcel 1.1
Area: 2.70ha

Parcel 1.2
Area: 8.43ha



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PJA

Revision Letter : P - Prelim / A - Approval / T - Tender / C - Construction

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Appendix 3 – ‘Levelling Up – The Logic of Logistics’ report



Levelling Up - The Logic of Logistics

A report demonstrating the wider economic, social and environmental benefits of the industrial & logistics sector



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Foreword

The Covid-19 pandemic has demonstrated that our industrial and logistics facilities are a key part of the nation's critical national infrastructure.

Alongside our supply chains, they support other important and growing sections of a strong economy and the way we live our lives by ensuring we have what we need at the right time. They are as crucial as the roads, rail, airport and port facilities needed to move goods around the country.

The sector also generates significant economic benefits supporting increasing numbers of high-quality jobs across the English regions. A thriving industrial and logistics sector is therefore critical to the government delivering on its ambitions to 'level up' across the UK with over 70% of demand for industrial and logistics space in the North of England and the Midlands.

Enabling the sector to reach its full potential is essential to the government's aspirations to address regional inequalities but our planning system remains a barrier and is restricting growth in the sector by not allocating enough land in appropriate locations. 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.

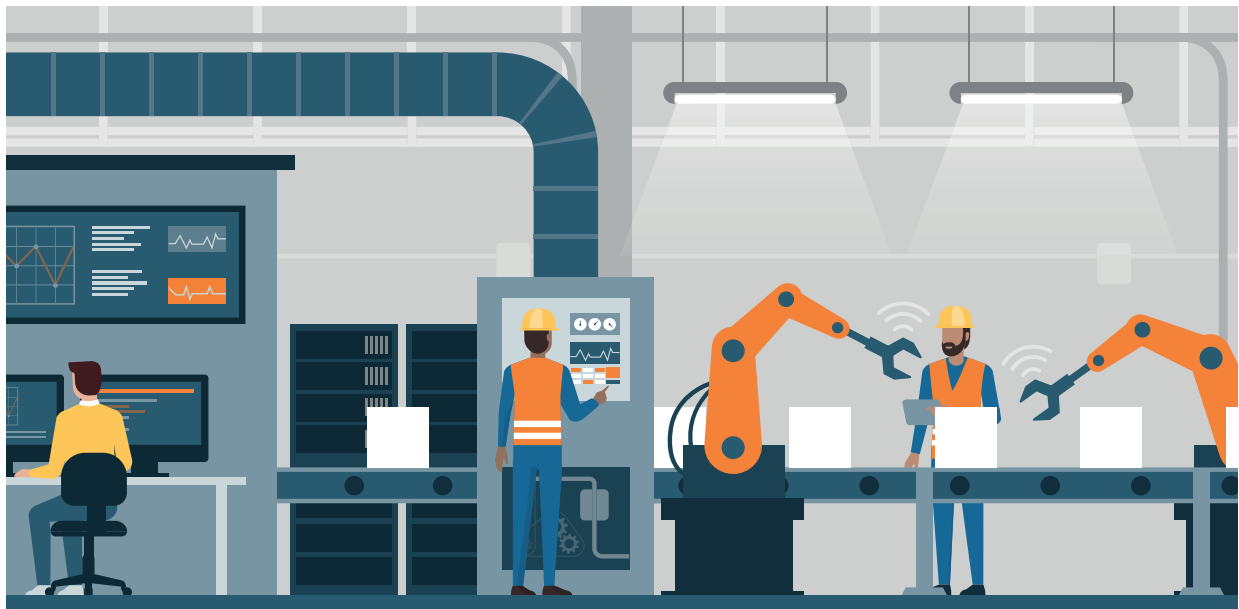
This latest BPF Industrial Committee report builds on previous research publications advocating for a more responsive planning system to the needs of the industrial and logistics sector. The report also provides a comprehensive overview of the growing economic, social value and environmental credentials of the sector as well as presenting case studies from within the BPF membership to reinforce these qualities.



Gwyn Stubbings

Planning Director, GLP

Chair of the BPF Industrial Committee



Executive Summary

An Economic Powerhouse

I&L facilities are Critical National Infrastructure

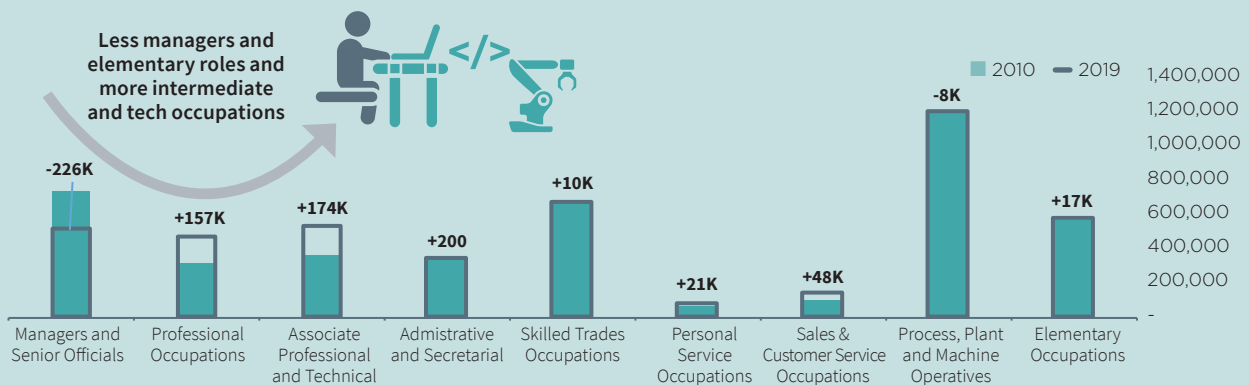
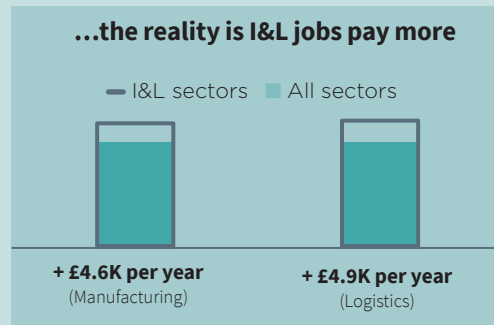


The I&L sector generates significant economic benefits

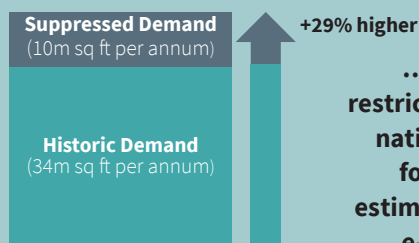


The I&L sector is subject to continuing misconceptions about average pay and skill levels

...and the occupations provided are becoming more diverse



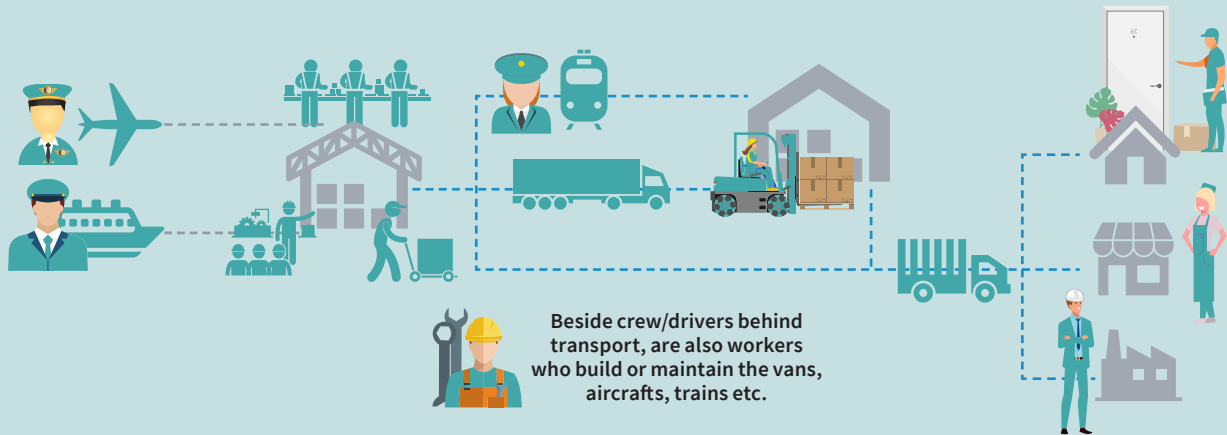
The UK planning system is restricting growth in the I&L sector by not allocating enough land in the right locations



...the historic lack of supply has restricted ('suppressed') demand by 29% nationally which should be provided for in the future. Future demand estimates should also consider housing, e-commerce and freight growth

Growing Social Value Credentials

I&L supply chains are far reaching and provide significant levels of employment in addition to onsite jobs



Most UK freight comes in via ports and airports

Freight is handled at port / air-side sheds before being distributed

Goods are moved mainly by HGV / LGV or rail to either distribution hubs (sheds) or direct to customers

End customers are either homes or businesses

I&L investment is helping to support the Government's 'Levelling Up' Agenda

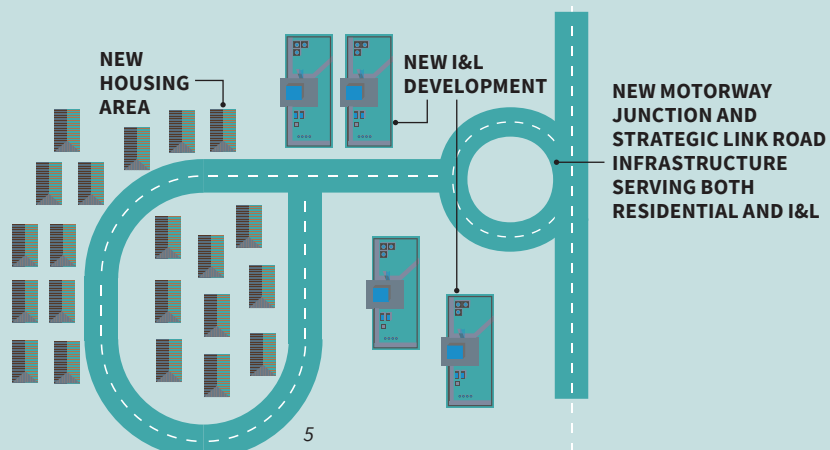
70% of I&L demand is generated in the North and Midlands.....



Given the I&L sector's strong economic credentials and growth prospects, future I&L jobs can be crucial in bridging the GVA and productivity gap between the North and South

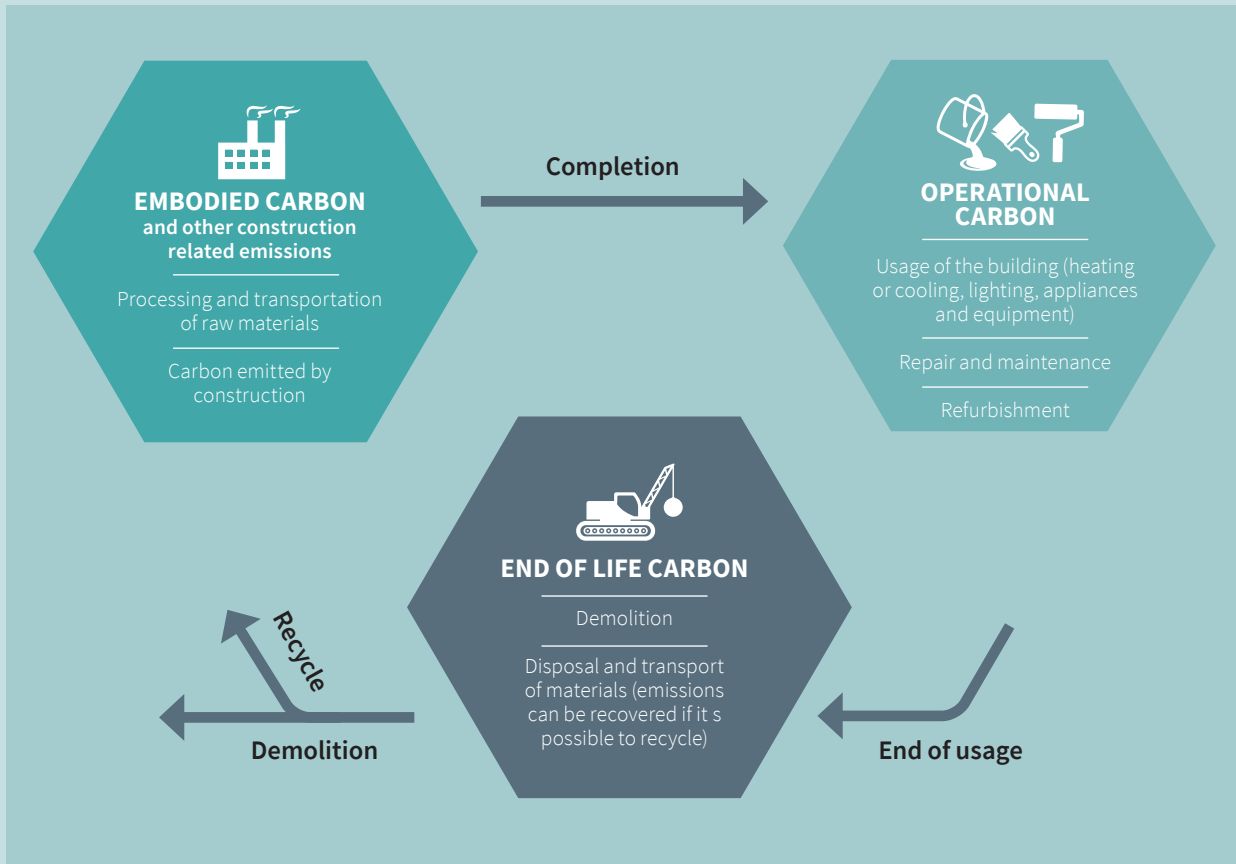
I&L investment can aid the delivery of new housing

I&L development can contribute to the delivery of new homes via the funding of strategic infrastructure such as motorway junction upgrades and link roads



A Green Recovery 'Boxed'

Carbon is present across all three phases of the property life cycle

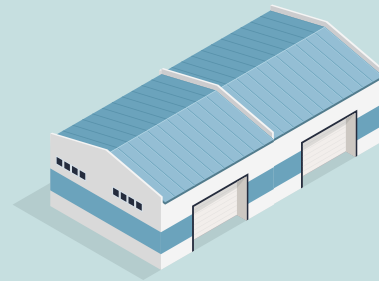


EMBODIED CARBON
I&L facilities can be built with recycled, low carbon and sustainably sourced materials



I&L buildings are achieving outstanding results for constructions such as Net Zero Carbon recognition, and top EPC and BREEAM ratings

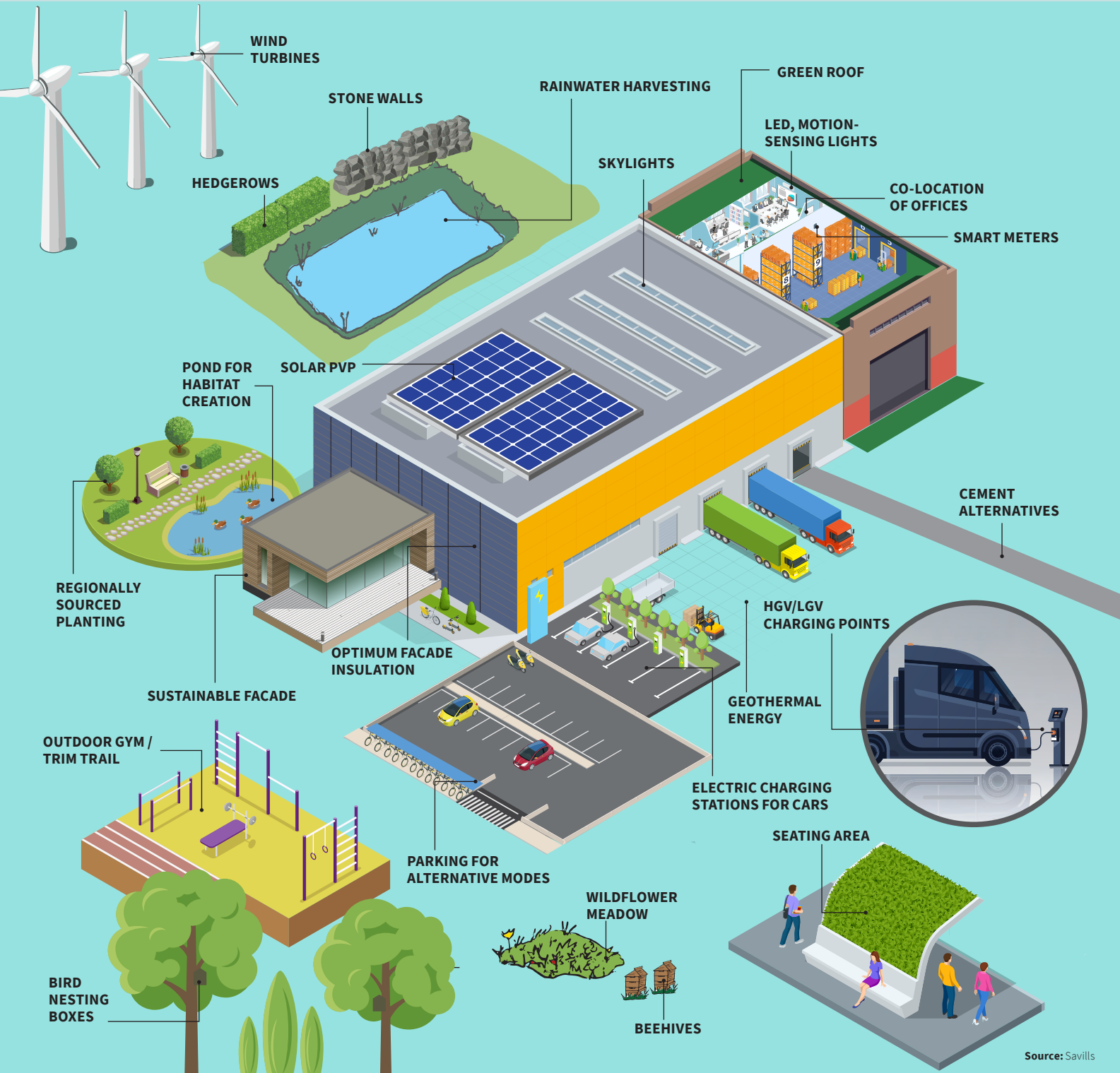
END OF LIFE CARBON
Modern I&L buildings have the advantage to be lightweight structures which are highly adaptable for a large range of uses



The steel frames used in I&L properties are much more easily recycled than concrete which is more common in other commercial uses

OPERATIONAL CARBON

I&L premises are innovating to reduce carbon



1. Introduction

The I&L sector is not only an economic powerhouse but also delivers significant social value and is embracing innovative ways to reduce carbon

The aim of this report is to evidence the importance of the industrial and logistics (I&L) sector to the UK, not just in terms of it being an ‘Economic Powerhouse’ but also in terms of its ‘Growing Social Value Credentials’ and contribution to ‘A Green Recovery Boxed’. It is hoped that by reviewing the sector against economic, social and environmental objectives, this report presents a balanced and evidential account of the sector’s future growth potential and the critical role it can play in a post Covid and Brexit UK.

The intended audience for the report are those integral to the sector’s future growth and success including: national government policy makers, local authority planners, elected members, investors and tenants, as well as those keen to learn more about the sector.

The report is structured as follows:

■ **An Economic Powerhouse** focuses on the sector’s economic attributes, namely how I&L premises facilitate modern lives and therefore should be considered as ‘Critical National Infrastructure,’ similar to how major roads, ports, airports and rail freight interchanges are. We also discuss the sector’s contribution to the national economy and the key growth drivers that are underpinning recording breaking

levels of demand. This chapter finishes by discussing a number of flaws in the way future demand and land needs are currently assessed as part of Local Plans and how these flaws can be addressed by using an alternative method developed by Savills and St Modwen;

■ **Growing Social Value Credentials** discusses the sectors contribution to local and regional communities, the Government’s ‘Levelling Up’ agenda and the range of jobs and training opportunities the sector creates as part of its wider supply chains. We also discuss how I&L developments are contributing to strategic infrastructure to the benefit of new housing developments and how modern I&L premises are adopting a more human-centric approach to their design; and

■ **A Green Recovery ‘Boxed’** outlines how the sector is embracing sustainability via a reduction in carbon across all phases of a property’s life cycle. We discuss how buildings are achieving net zero in construction; how carbon can be reduced during operations through clever building design solutions that improve energy supply and reduce energy demand; and we finally consider a property’s end of life, exploring how I&L premises can be repurposed for other uses.

Reader’s Note

When we refer to the industrial and logistics (I&L) sector we mean Light Industrial (formally B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require warehouses or factories (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

2. An Economic Powerhouse

Recent global challenges have proven that the I&L sector's workers, stock of facilities and distribution networks are unquestionably 'critical national infrastructure'

I&L facilities and their supply chains support the functioning of our economy and the way we live our lives. The food we eat, the products and services we purchase, the materials used to build new homes and new infrastructure, even the vaccines that give us protection from Covid are stored, manufactured and distributed from warehouses and factories to 'us' the end customer. Without these facilities and the increasingly efficient supply chains that link them up with suppliers and end customers, the delivery of our purchases would be much slower, more expensive and we would have less choice.

It can be difficult to acknowledge the critical role played by the I&L sector when everything is running smoothly. It is much easier to understand its importance when things don't work quite as well. The six-day blockage of the Suez Canal in March 2021 created a domino effect on global supply chains, which affected not only those sectors relying on container shipping but also the transport sector as fuel vessels were delayed too. The shortage of HGV drivers in autumn 2021 led to fuel shortages in UK petrol stations and forced businesses to close down sites or cut product lines, adding to the backlog of production caused by the Covid pandemic.

These challenges have brought to the fore the importance of supply chain resilience and the need for a sufficient supply of appropriately located I&L premises. For instance, during the recent lockdowns, the I&L sector has been instrumental to ensure the effective delivery of medical stock in hospitals and food supplies on supermarket shelves. As vaccines were made available, the operation of effective distribution networks across transport modes was fundamental to supply vaccination centres while meeting stringent time frames and cold-store requirements. The pandemic has indeed proven that our daily life depends on the I&L sector. Its workers, stock of facilities and distribution networks are unquestionably 'critical national infrastructure.' The sector is also critical to the Government's 'Levelling Up' agenda given it is one of the few large sectors that invests more in the central and northern parts of the country rather than London and the south. We discuss this issue further in the 'Growing Social Value Credentials' chapter.

The sector's growth is critical to the UK's future prosperity

The sector is a significant employer of at least 3.8 million people. However the true number of jobs is likely much higher as this only relates to 'manufacturing, transportation and storage'¹ activities. The wider supply chains of I&L businesses



Key stats: I&L sector



Source: ONS, Oxford Economics, Savills²

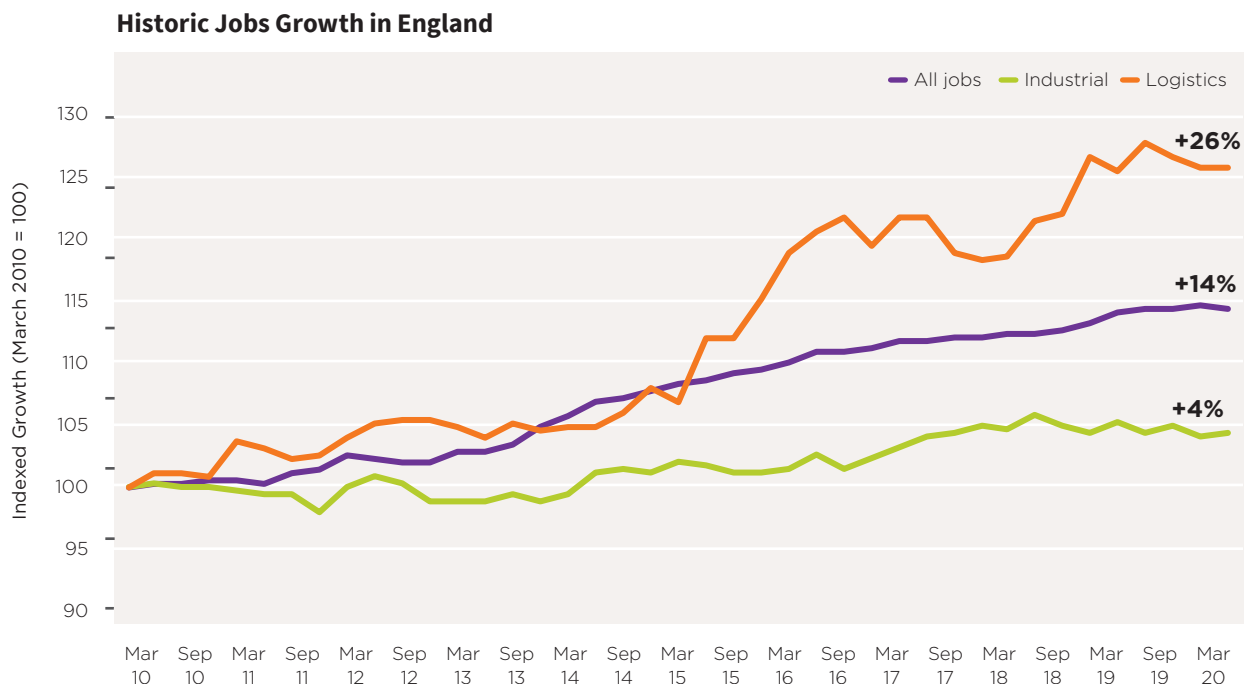
include other types of jobs not covered by this statistical classification. For instance, office based roles and professions such as product design, research & development and engineering are routinely found in I&L companies but fall within the ‘professional services’ classification.

A prime example of the wider economic impacts of I&L supply chains is Amazon. In addition to the 55,000 staff³ it employs directly in the UK, the company is reported to have created 175,000 jobs via the 65,000 plus small and medium-sized enterprises (SMEs) who are selling professionally through Amazon⁴. While Amazon’s diversity

lies primarily in the different products it handles and distributes, I&L companies can differ greatly in terms of their operational characteristics and the activities conducted from their premises.

Not only is the I&L sector large, at 14% of the England economy, it is fast growing too. Over the last 10 years, jobs within the logistics part of the I&L sector have grown by 26% compared to only 14% across the economy as a whole. Its growth profile has been further accelerated by the Covid pandemic and Brexit as we discuss further below.

“Over the last 10 years, jobs within the logistics part of the I&L sector have grown by 26% compared to only 14% across the economy as a whole.”



Source: ONS, Workforce Jobs by Industry and Region, Savills



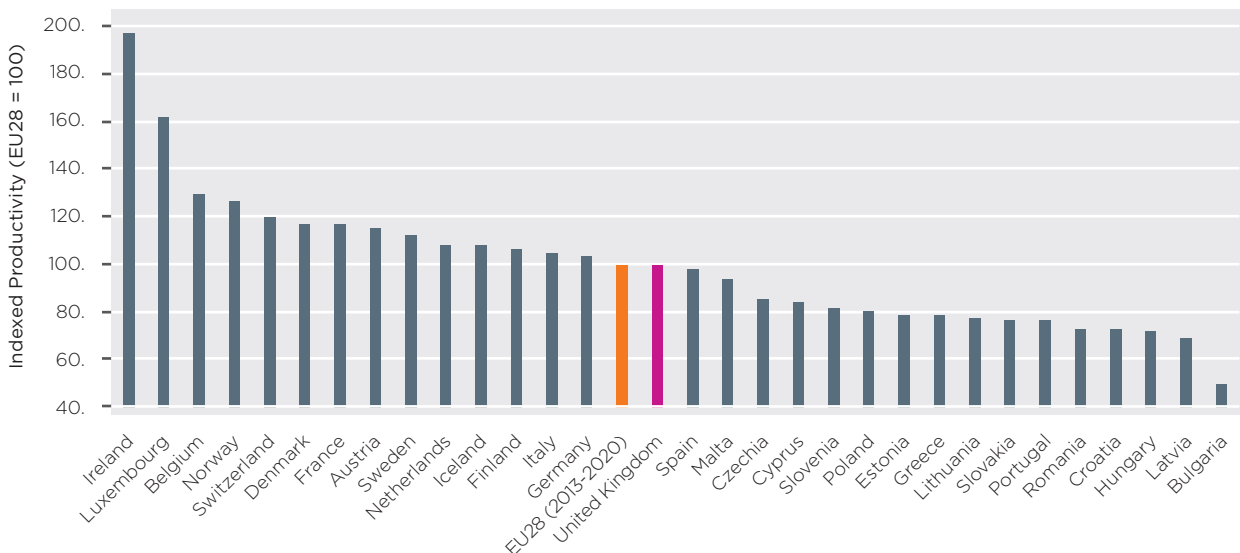
The sector is also highly productive with Gross Value Added (GVA)⁵ per job currently at £58,000, some 12% higher than the average of all sectors. Its productivity is also predicted to grow at a faster pace, increasing by 29% between 2025 to 2039 compared to 18% across the UK economy as a whole⁶. These are extremely important statistics given the UK's labour productivity currently lags many of its western European peers as shown in the chart below.

Improving the UK's labour productivity will become increasingly important in a post Brexit world given its important bearing on attracting inward investment,

ability to pay higher wages and higher tax revenues for the Government which can be reinvested in critical services and infrastructure.

The vision of the UK becoming a "high-wage, high-skill" economy was central to Prime Minister Boris Johnson's Conservative Party Conference speech on the 6th October 2021. Essential to achieving this vision will be to increase overall labour productivity, which in turn will require further growth in the more productive parts of the economy which undoubtedly include the I&L sector.

Labour productivity per person employed - 2019



Source: Eurostat, Savills



I&L growth is being driven by numerous factors

Not just e-commerce driving growth

While e-commerce grabs most of the headlines for driving growth in the sector, there are several growth drivers at play as illustrated below. Combined, these growth drivers are resulting in unprecedented demand for I&L premises.

Savills January 2022 Big Shed Briefing⁷ reported that 55.1 million sqft (gross) of warehouse space had been transacted in 2021, setting a new annual record for take-up and being 86% above the long-term annual average.

I&L Growth Drivers



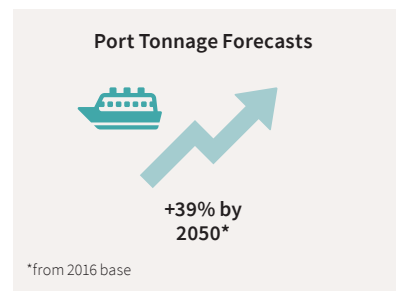
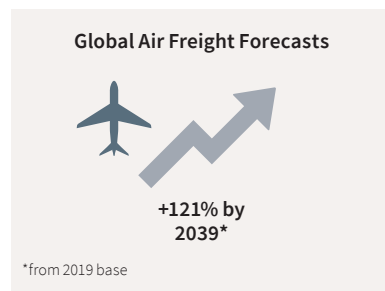
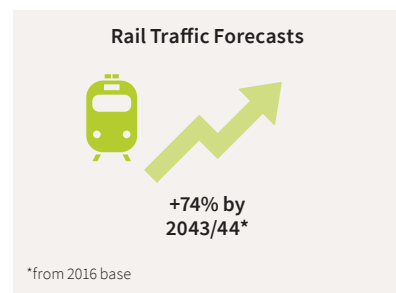
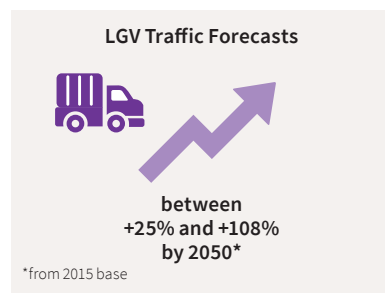
Source: Savills

Growth in UK freight

Freight arriving and leaving the UK needs to be sorted, packaged and distributed via a network of freight handling infrastructure (i.e. ports, airports, rail freight interchanges and motorways) and optimally located I&L premises in order to reach end customers.

Significant growth is forecast across all freight modes, which will increase demand for I&L space in the future. I&L premises should not be seen as separate from the infrastructure which enables goods to be moved around the UK, but should be considered critical national infrastructure itself.

I&L forecasts



Source: DfT, MDS Transmodal for Network Rail, Boeing, DfT, Savills

E-Commerce Growth

E-Commerce growth is being driven by two factors.

Firstly, population growth. The UK Government has announced a housing shortage in response to demand consistently outstripping supply. To address this situation, the Government has set an annual housing target of 300,000 homes per annum in England which it is struggling to achieve with less than 225,000 homes delivered per annum over the last five years⁸. Based on current online retail spending data⁹ and average household size¹⁰, 300,000 homes per annum equates to an extra £1.3 billion per annum in online retail spending. Using the 'warehouse to homes ratio' discussed in the BPF's 'What Warehouse Where?' report¹¹, this level of housing growth could generate a warehouse requirement of 21 million sqft per annum on its own.

Secondly, technological improvements coupled with society's increasing preference to purchase goods and services online. Retail spending is growing faster than the rate of population growth (+71%¹² vs +14%¹³ over the last 20 years). More of this retail spending is being conducted online, for instance in 2006 online sales accounted for only 3% increasing to 19% prior to the Covid pandemic in February 2020. The Covid pandemic has accelerated this growth with internet sales currently at 26%¹⁴ and forecast to grow to 37% by 2025¹⁵. The growth in online shopping has significant implications on future I&L demand given that e-commerce requires over three times the logistics space compared to traditional brick-and-mortar retailers¹⁶.

Faster Deliveries

Consumer expectations for same-day or next-day delivery are reshaping the operating models of logistics companies. For instance, the emergence of Zapp, Getir and Deliveroo who deliver groceries "in minutes" while most of the major retailer such as Boots, Next and many more deliver next day. These trends are expected to increase demand for logistics space as reduced delivery times are expected to benefit online retailers.

The Covid pandemic has accelerated this shift: a survey by Bringg¹⁷ found that since the start of the pandemic 27% of retailers added same-day delivery for online orders as a fulfilment option and 1 in 3 retailers are planning to add same-day delivery options in the next 6 to 12 months.

To enable fast deliveries, stock needs to be held near the end customer before it's picked up for the last mile. This requires warehousing space in regional and local distribution hubs nearby to population centres. Large 3PLs like Amazon can more easily fit this model within their existing operations due to the sheer number of deliveries that they fulfil daily and their huge geographic coverage. For most retailers however this move will require investment in technology and upskilling of staff in addition to more warehousing space. In some cases, it could require setting up their own delivery fleet to improve margins, as already done by some large grocery retailers such as Sainsbury's, Tesco and Asda, to cope with the growing demand for online orders.

Near-shoring / re-shoring

The Covid pandemic and Brexit have created major disruptions for the sector's supply chains in the form of border restrictions, lockdowns and access to labour such as HGV drivers. In order to minimise similar disruptions in the future, many UK companies are moving their operations either back to the UK or closer by. Likewise certain I&L activities may be re-shored to the UK as it becomes more expensive to conduct business in the EU as a result of Brexit. According to a survey carried out in July 2020 by the Institute for Supply Management, 20% of firms are planning to or have already started to near-shore or re-shore. These findings are corroborated by a survey carried out by Savills¹⁸ whereby over 80% of respondents expected the Covid pandemic to either 'greatly increase' or 'somewhat increase' on-shoring. This is likely to lead to higher domestic inventory requirements, further increasing long-term demand for I&L space.

Definitions

Near-shoring

Transferring a business operation to a nearby country as opposed to a more distant one (i.e. off-shoring)

Re-shoring

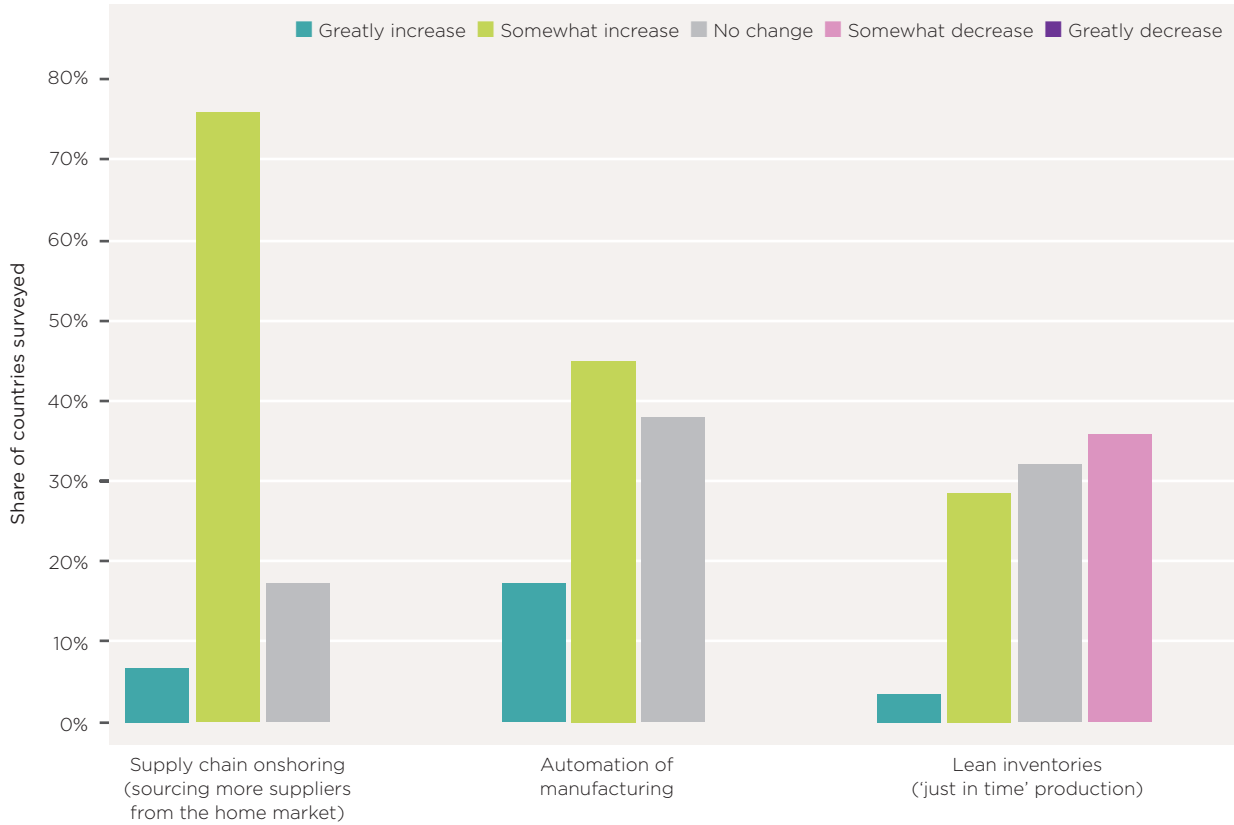
Moving a business that had gone overseas back to the country from which it had originally relocated

"To enable fast deliveries, stock needs to be held near the end customer before it's picked up for the last mile. This requires warehousing space in regional and local distribution hubs nearby to population centres"



Certain I&L activities may be on-shored to the UK in response to international supply chain disruptions

Impact of Covid-19 on supply chains and manufacturing after pandemic has passed



Source: Savills Research

Co-locating different business functions

As the operations of modern day I&L companies have evolved via investments in automation and technology, so have the types of occupations found in the sector. Alongside traditional roles such as factory / warehouse managers, forklift operators and delivery drivers are a diverse range of new roles such as software engineers in charge of automated systems, supply chain managers and data analysts.

While these new and more diverse occupations are the result of operational changes in the sector, these changes are impacting the design and composition of modern I&L premises. One such change is the increased prevalence of office space being co-located with warehouse and manufacturing facilities to house these new roles, but also as a means of improving operational efficiency, reducing estate costs and fostering stronger collaboration between different business units (see Bidfood case study). Based on Savills data tracking large units over 100,000 sqft across the UK, the amount of office space found in I&L premises has increased over the last five years.

While the external appearance of premises occupied by a manufacturer may look similar to that occupied by a logistics company, their internal fit out, even a building's environmental performance are increasingly tailored to the specific requirements of individual companies. Modern I&L premises are also found to house gyms, cafes, restaurants, game rooms, and even hairdressers and physiotherapy suites. As a result, the types of activities undertaken, the levels of employment generated, and range of occupations found on site are very much company specific. This diversity evident in the sector is not adequately captured via the current planning use classes or standard job densities applied to I&L developments.

As detailed in our Gymshark case study below their diverse operations are being co-located together meaning its premises do not fit solely within either an office (E(g)(i)), research and development (E(g)(ii)), industrial processes (E(g)(iii)), general industrial (B2) or storage and distribution (B8) use class. Nor do any of its different activities operate as ancillary to one another but rather as separate components of a collective whole.

Case Study: Gymshark

Gymshark is a fast growing clothing company which is now expanding across multiple facilities in Blythe Valley Business Park (Solihull) to create a campus style working environment. The large warehouse chosen for their new innovation hub provided Gymshark with the necessary flexibility to house multiple functions, combining

production, storage, design studio, innovation and office space, meeting rooms and breakout areas. The building is designed to bring together these diverse uses and the people covering different roles to promote innovation and integration across a number of functions.



Source: GymShark

Case Study: Bidfood

Purpose-built for Bidfood, the 117,400 sqft premises in the Slough Trading Estate include 22,000 sqft of head office accommodation arranged across three floors for marketing, commercial, quality control, finance,

IT, customer services and telesales personnel. The remaining floorspace includes a customer presentation suite, temperature-controlled warehouse and distribution facility.



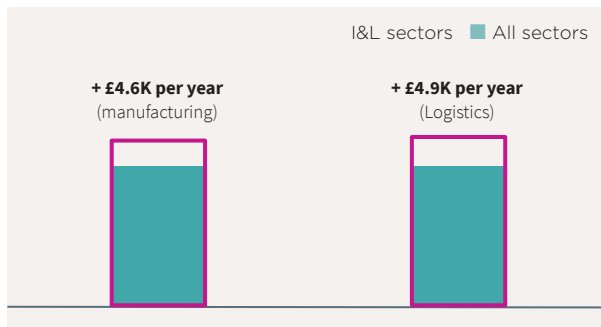
Source: SEGRO

Diverse and better paid occupations

The I&L sector is subject to several misconceptions about average pay levels, skills required, and types of spaces provided. It is not a low paid¹⁹, low skilled employer, in fact, the reality is very different.

Firstly, average pay is higher than the UK average. Data from the Office for National Statistics (ONS) show annual wages above average at +£4,600 for Manufacturing and +£4,900 for Logistics.

I&L jobs pay more



Source: ONS (2021) ASHE, UK Gross Annual Pay in 2020

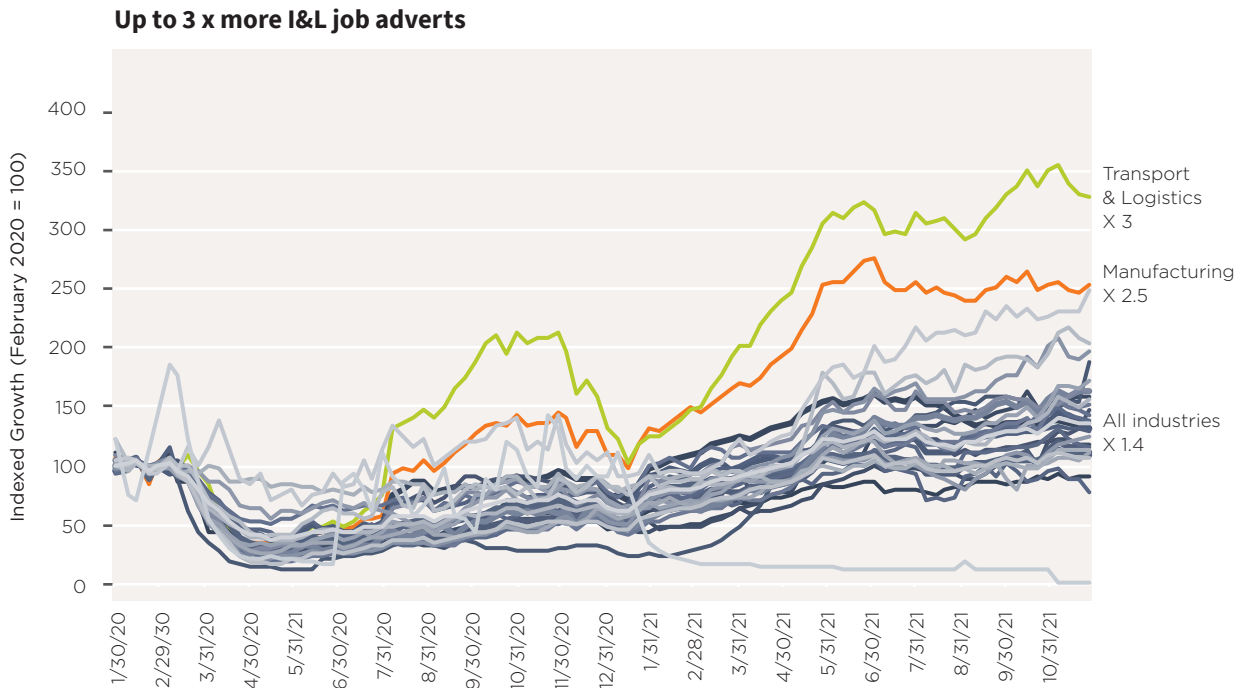
Secondly, while other sectors have contracted during the Covid pandemic the I&L sector has continued to expand. Data on online job ads tracked by ONS via Adzuna indicate that job postings have increased by three times for transport & logistics roles and two and a half times for manufacturing roles since the start of the pandemic²⁰. Two notable examples behind these statistics are the John Lewis Partnership and Amazon:

- The John Lewis Partnership is recruiting more than 550 permanent full-time driver and warehouse partner roles across their distribution centres and Waitrose.com and John Lewis.com customer delivery centres²¹; and
- Amazon committed to recruit 20,000 temporary staff for the busy Christmas period across its network of fulfilment centres, sort centres and delivery stations²². These are in addition to the 7,000 permanent jobs it announced in September 2021²³.

“The Industrial & Logistics sector is not a low paid, low skilled employer, in fact, the reality is very different”



I&L job adverts have increased during the pandemic

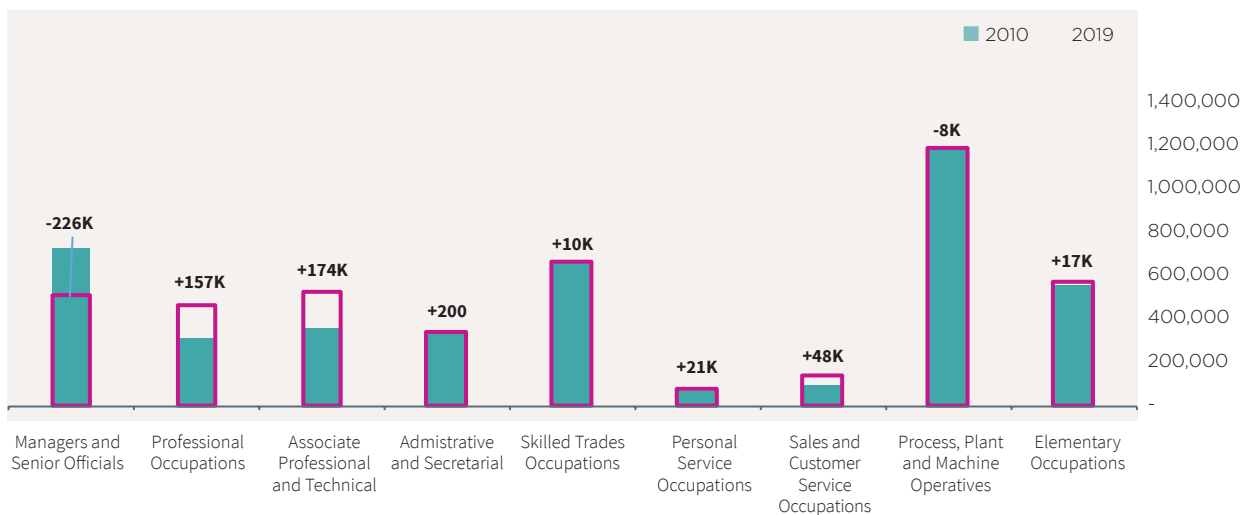


Source: ONS (2021), Online Job Advert Estimates based on Adzuna

Thirdly, I&L jobs have become increasingly diverse over the last decade. At the beginning of the decade the sector had a much more polarised distribution, with a higher share of managers at one end of the spectrum and more plant and machinery operatives and elementary occupations at the other end. Today we see a higher share of Professional and Associate Professional and Technical roles, typically associated with higher-skilled engineering and technological professions.

This is in response to increased automation and robotics in the sector and more advanced supply chain processes. These office-based roles are increasingly co-locating alongside production and logistics uses as it is convenient for these people to be closer to the operations they control and analyse. This increased occupational diversity means the I&L sector can play an important role in re-employing people that have lost jobs in other sectors of the economy as a result of the Covid pandemic.

I&L occupations are becoming more diverse



Source: ONS, APS

Case Study: Overclockers

Overclockers are a modern British logistics and e-commerce success story. Initially founded in 1999 as a web retailer of custom 'overclocked' PCs, Overclockers started life trading from a tiny, 400 square foot warehouse in Stoke-on-Trent. It was, in many respects, a precursor to the personalisation and e-commerce boom that has transformed the way Britain likes to shop today. In 2021, following phenomenal business performance during the pandemic, which saw record demand for high performance computers, gaming hardware, and personalisation in the era of working-from-home, Overclockers now employ 107 staff across three areas and will soon move into a new, 100,000 square foot St. Modwen built warehouse.

Overclockers are a traditional logistics business in the sense that they receive and ship products to and from

Europe, and all over the world. However, the extreme technical personalisation service that they offer to customers – Overclockers configure some of the world's most powerful personal computers – means its workforce is highly skilled, with a significant proportion of the team hired as apprentices and trained on-the-job.

Employing and nurturing a highly skilled, local workforce is not the only service that Overclockers provides to society. Some of its clientele include police forces, who require especially powerful computers to help them solve crimes, Formula One teams, who operate right at the cutting-edge of technology and data, and universities, who have an increasing need for ever-more-powerful computers to help them find solutions for some of the world's most pressing issues, including climate change.



Source: St Modwen

The UK planning system is restricting growth

The strong growth expected in the I&L sector, and the jobs, investment and productivity it will bring, will not materialise unless sufficient land is allocated in the right locations. The planning system is the guardian for allocating land, therefore it is critical the employment evidence which support Local Plans do a more accurate job at assessing future demand.

This issue has been central to the recommendations of other BPF publications, most recently the BPF's Employment Land Manifesto which recommends:

- Introducing a *Presumption in Favour of Logistics Development* within the NPPG when precise criteria are met. This is needed as Local Plans can take years to be adopted and therefore are completely out of kilter with the pace of market changes;

- Ensuring *Local Plans allocate sites in the right locations* to respond to a broad range of market needs;

- Modernising Employment Land Reviews to allow for the utilisation of 'real time' information so that they can be kept up to date; and

- Introducing an *Employment Land Delivery Test* to ensure that a commensurate amount of employment land is brought forward to counterbalance housing and that any employment land lost to other uses is delivered in the right locations. If a local planning authority failed to meet the delivery test, a presumption in favour of sustainable logistics development could be engaged.

The attributes of an optimal I&L location



Source: Savills

Although the National Planning Policy Framework (NPPF) provides a clear and positive policy context to assessing future economic needs, the Planning Practice Guidance that accompanies the NPPF lacks the same clarity. Economic need plays second fiddle to housing need in the guidance, the latter being subject to a standard methodology with a series of unambiguous steps set out to establish the minimum annual housing need for each local authority area.

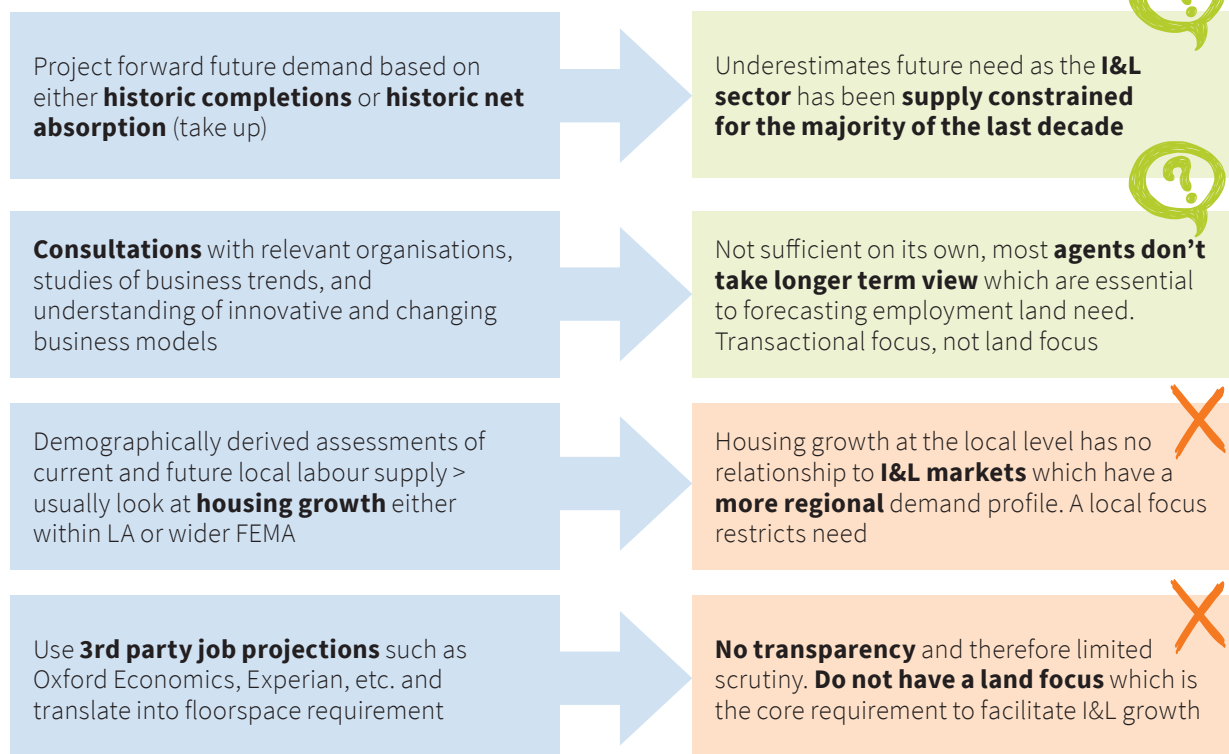
There is specific reference to the critical role of logistics and the need for market analysis and engagement with stakeholders, but the guidance fails to provide a clear and robust approach to

ensuring I&L needs are met. As a consequence, an array of local authority strategies are being adopted resulting, in most cases, too little land being allocated to meet current and future market demand. This is primarily due to these strategies being backwards looking and projecting forward historic trends as a proxy for future demand. As a result, modern day growth drivers are not taken into account, for example: housing growth, online retailing growth, increasing UK freight volumes and the need for larger premises, all of which generate increased demand for I&L land and floorspace. The main NPPG methods for estimating future land needs and their deficiencies are summarised below.



The UK planning system is restricting growth in the I&L sector by not allocating enough land in the right locations

Current NPPG methods are not fit for purpose



Source: Savills

The inadequacies of these models and their application is evident in that supply historically has not kept pace with demand. When demand cannot be fully satisfied occupiers vie for limited available space pushing up rents. This is what we have seen over the last decade with 61% rental growth²⁴, more than double the rate of inflation.

At the national level, the market equilibrium level where supply and demand are broadly in balance and rents are more stable is around 8% availability. This benchmark rate is found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance (SPG). England's I&L market has been below this level for over seven years clearly demonstrating the failure of the current NPPG methods in estimating demand accurately. Put another Net absorption is a leading measure of demand, comparing occupied space (move-ins) versus vacated space (move-outs).

This relationship between supply and demand is clearly shown in the chart below. When available supply was higher at around 10%-12% in 2012-2014 net absorption averaged 47 million sqft per annum (net). This is higher than the average net absorption more recently from 2015-2020 at 34 million sqft (net) despite the UK only having just emerged from the Global Financial

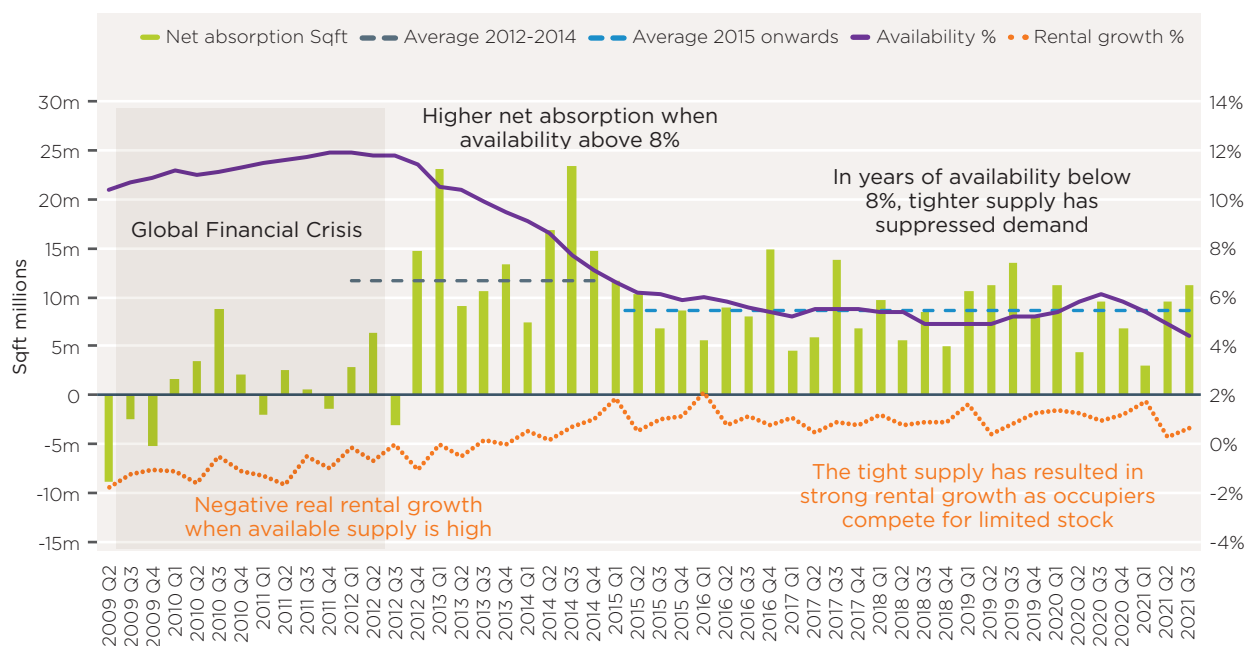
Crisis (GFC). The key reason why leasing demand was higher in 2012-2014, despite the impact of the GFC, is that sufficient available supply existed to accommodate demand, even though overall demand was weaker compared to the more recent period post 2015. After 2015, available supply has been well below the equilibrium rate of 8% which has suppressed overall demand as it could not all be accommodated.

A further clear indicator of demand exceeding supply is strong rental growth. As can be seen from the bottom part of the chart real rents²⁵ have been growing strongly since 2015 when availability dropped below 8%. This is distinct from the period after the GFC (2012-2014) when real rental growth was either negative or zero, indicating there was more than enough supply to meet demand.

Definitions

Net absorption is a leading measure of demand, comparing occupied space (move-ins) versus vacated space (move-outs).

Historic supply constraints have suppressed demand



Source: Savills

To help address the supply / demand imbalance Savills and St Modwen have developed a new methodology built upon the principle of ‘suppressed demand’ that accounts for demand that has been lost due to supply shortages. The calculation of suppressed demand can then be added to historic demand projections to give a more accurate picture of likely demand into the future.

The high level steps in the Savills / St Modwen employment land estimation model includes:

A. Find a market’s equilibrium availability rate: This is around 8% at the national level but can alter slightly from market to market. A market’s equilibrium rate is either when rents are broadly stable or when rental growth transitions from being negative or stable to growing strongly year on year.

B. Identify those years when available floorspace was below the equilibrium rate: This involves identifying previous years when availability was below the 8% equilibrium rate.

C. Calculate suppressed demand: Here you calculate how much demand the market should have had in those years of tight supply in order to be at the equilibrium rate. For instance, if the equilibrium rate is 8% but the market had 5% in a given year, the 3% difference needs to be translated into floorspace.

Next, you calculate the average of the ratio between net absorption and available floorspace for every year over the lookback period. This ratio is then applied specifically to the availability uplift that was needed in those years of tight supply to reach the equilibrium rate. This provides a suppressed demand calculation for each year when actual availability was lower than the equilibrium rate. These are then added together to give a total suppressed demand over the lookback period.

D. Add suppressed demand to historic trend: Finally the suppressed demand is added to the historic demand over the lookback period. The annualised figure of this combination can then be projected forward over the Local Plan period to provide a more accurate estimate of future demand.

This methodology when run at the England level estimates future demand will be at least 29% higher than historic levels, equating to a minimum of 44 million sqft per annum (net). A useful cross reference to make here is with the BPF’s previous report ‘What Warehouse Where?’ which estimated each home could generate a need of 69 sqft of warehouse space or 21 million sqft per annum based on the Government’s annual housing target of 300,000 homes. While Savills calculations are for both warehousing and industrial demand (i.e. the entire I&L sector), this comparison usefully gives an idea of the significant contribution warehouse needs from new homes will make to overall future I&L demand (of up to 48%).

If supply improves in England, future demand p.a. (net) will be at least 29% higher than historic levels

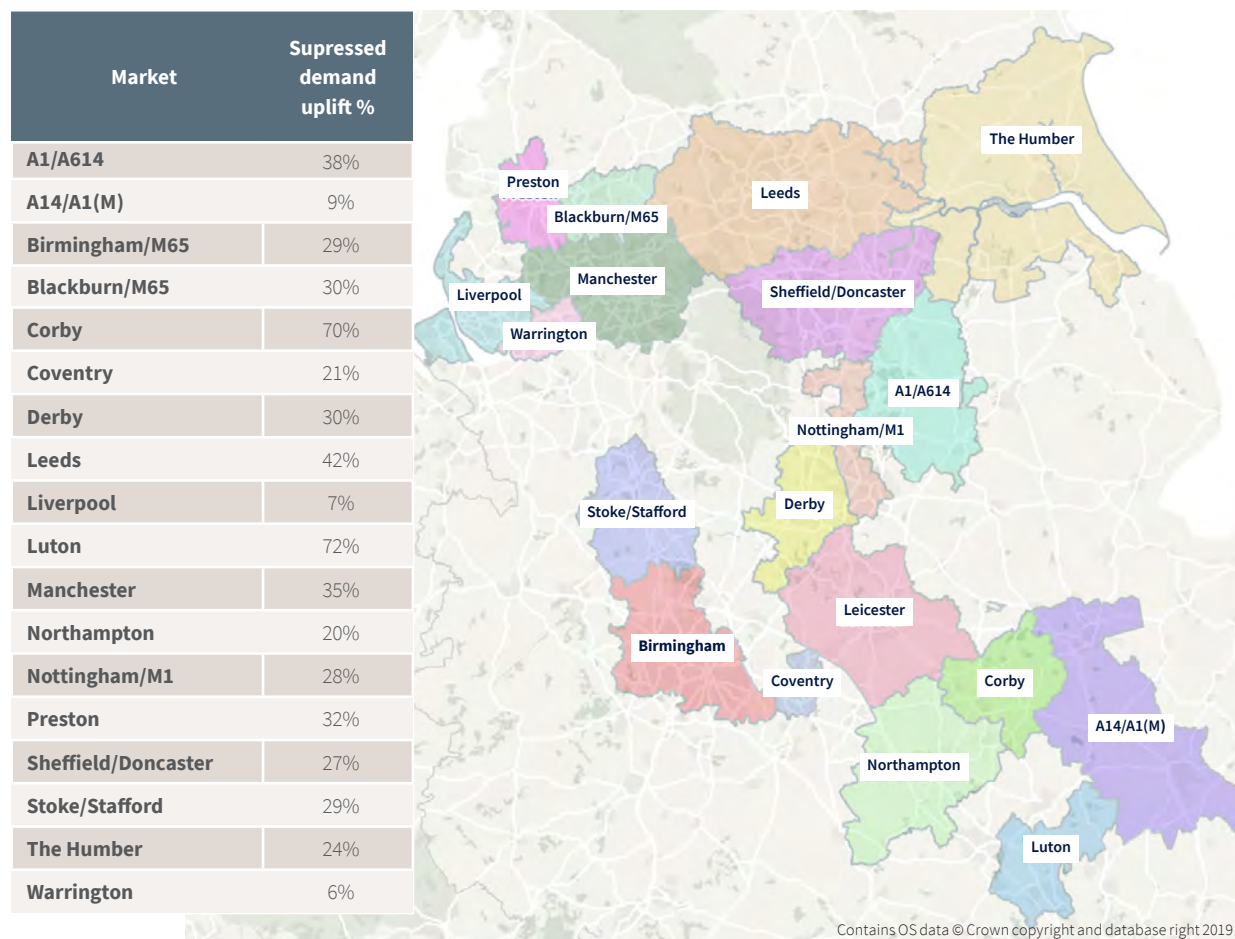


Source: Savills

Savills has tested its suppressed demand model across 19 key I&L markets in England. Many of these markets have historically experienced leasing demand well beyond the supply of available land and floorspace. The percentages on the table indicate how much additional demand (as a minimum) should

be planned for in the future within each market above historic levels. While these results are based on wider market areas made up of a collection of local authorities, the model can be run at the national level, the individual local authority level as well as more bespoke market areas.

Markets Tested for Suppressed Demand in England



Source: Savills 2021

The above suppressed demand figures should be considered minimums as their focus is on correcting past trends by accounting for lost demand due to historic supply constraints. This more accurate historic trend should also be uplifted further to account for current day

and future demand drivers, the key ones, as discussed above, being online retailing growth and growth in freight volumes. Savills has developed a method for calculating these factors too (please see below contact details for further information).

For further information on the Savills/St Modwen methodology, please contact either:

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3. Growing Social Value Credentials

I&L development generates direct and indirect jobs and substantial social value in the form of training and apprenticeships

The social value of I&L supply chains

I&L developments generate significant jobs and economic benefits as part of their wider supply chains in addition to onsite employment. In turn, these economic benefits create social value in the form of apprenticeships, training and upskilling opportunities for local people.

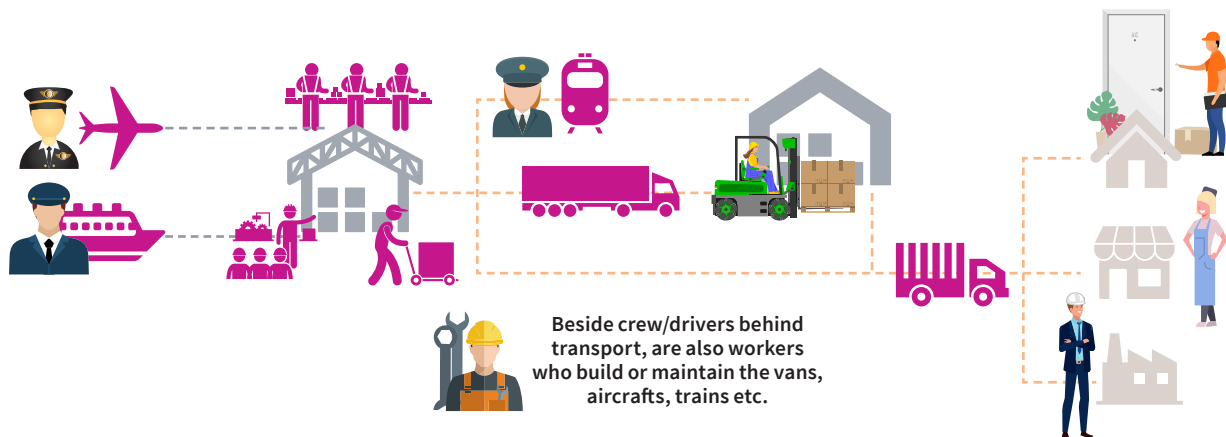
I&L jobs range from entry level graduates to highly skilled engineering and management roles. This wider supply chain employment is often overlooked in favour of the higher on-site job densities for retail and office uses. However, in many cases, the office and retail jobs envisaged in Local Plans are not created given these uses are unviable to build in many locations throughout the country.

In terms of wider supply chain employment, production plants and warehouses require goods to be transported and

delivered between their suppliers and end use customers. This creates the need for drivers of Heavy Goods Vehicles (HGVs) and Light Goods Vehicles (LGVs). LGV licences alone have increased by 83% over the last two decades²⁶ in response to the rise in online shopping and subsequent expansion of the I&L sector. This increase in HGVs and LGVs creates jobs involved in their manufacture, maintenance and repair.

The growth of the UK's freight industry also creates significant jobs. I&L premises are a critical link in the chain alongside the key freight modes that allow goods to enter, leave and move around the country (i.e. ports, airports, rail freight interchanges and motorways). Like warehouses and factories, these freight handling facilities generate employment to drive the planes, trains and boats, as well as jobs involved in their maintenance and repair. Jobs are also created at ports, airports and rail freight interchanges as part of their operation.

Employment within wider I&L supply chains



Source: Savills

As discussed above, the sector has also increased its share significantly of professional occupations (plus 157k) and associate professional and technical roles (plus 174k) over the last decade. Many of these roles are involved in supply chain

management, engineering linked to the sector's increased automation, sales and marketing and even research and development into future advancements such as drone deliveries and autonomous driving vehicles.

The sector also generates significant construction and apprenticeship roles which will increase further as it expands into the future. As discussed earlier, Savills estimate future I&L needs in England to be at least an additional 44 million sqft (net) per annum. This is an uplift of 29% against the historic 10 year trend and accounts for suppressed demand (i.e. demand that has not been accommodated historically due to the lack of available supply). This future demand, if facilitated via the bringing forward of ample land supply, will give rise to a vast construction programme that will support 45,400 jobs per annum. Of these, 400 construction apprenticeships will be created each year, delivering a social value of over £7.8 million

per annum²⁷. Based on Savills research on local procurement benefits, we expect this construction programme to generate £440 million of social value benefits for local communities²⁸.

The I&L sector also delivers on average 41,100 apprenticeships starts per annum²⁹. This is particularly important given the high levels of youth unemployment in England which currently stands at 14.6%³⁰. If the sector is able to expand consistent with Savills estimate of future demand, the number of apprenticeships could grow to 53,000 starts annually; which is equivalent to over half a million apprenticeships over the next 10 years.

Case Study: From unemployed to full-time, permanent employee

Jehan's journey to employment shows her determination to seize the opportunity enabled by I&L development at Hinckley Park and Mercia Park. Below are some excerpts from Jehan's story as told on winvic.co.uk.

"Back in April 2019 I was unemployed and my Jobcentre Plus assessor told me about a jobs fair that was taking place. I spoke to a number of different organisations and businesses there but one offering that really caught my attention was a training course being offered by North Warwickshire and South Leicestershire College, IM Properties, Winvic and a local groundworks subcontractor, which focused on groundworks and health and safety. [...]

I was accepted on to the three-week course and in June 2019 I walked into a college classroom as the only female out of 22 attendees – I didn't feel apprehensive about this, but instead, I thought prove you can do it and see what happens. The first week focused on employability skills, such as interview techniques, the second was all about groundworks – and this was all on-site at Hinckley Park as the earthworks were being undertaken there – and the last was back in the classroom for health and safety training, sitting exams and a job interview with a Winvic groundworks subcontractor on the project."

Upon completion of the course, Jehan obtained her CSCS card, an employability certificate and a City and Guilds Level 1 in Health and Safety. The subcontractor she had the interview with passed on her CV to their network and in November 2020 Jehan was invited to an interview with Winvic's HSEQ Director Ian Goodhead, for a Covid Marshall role at the fit-out project at Hinckley Park. A week later she was already on site to start her new job.

After her Covid Marshall role ended she started to look for other options. "When discussing potential options with Ian



Goodhead, a position at IM Properties site, Mercia Park was mentioned to me. I had an interview with my now Project Manager Frank Hayes and HSEQ Manager David Powell, I'm happy to say that I'm now an Assistant Site Manager. I've now undertaken my Fire Marshall, Fire Co-ordinator, First Aid, IPAF, cherry picker, scissor lift and Confined Space Management training and I'm about to undertake my Temporary Works Co-ordinator Training and NEBOSH, which I'm hoping to complete it over six to eight weeks via distance learning.

In one way it's still hard to believe that a three-week training course through attending a jobs fair has really led me to a complete career change, a stable job in an area I was interested in AND that it's with a successful and supportive company!"

Source: <https://www.winvic.co.uk/news/how-laying-social-value-foundations-constructs-new-careers-meet-jehan-our-latest-assistant-site-manager/>

Case Study: GLP Centre of Logistics Education & Research (CLEAR) at Magna Park Lutterworth

The Centre for Logistics, Education and Research (CLEAR) is a research, innovation, education, and training facility that is being developed through a partnership between industry and education in Magna Park, Lutterworth. CLEAR will provide skills training and professional development at all levels across the spectrum of logistics and supply chain roles, creating training pathways of progression for new entrants and established talent alike. The centre will give students the opportunity to learn while they earn via a portfolio of work

based, facility based or online learning options. Delivery of training will be by North Warwickshire and South Leicestershire College (NWSLC) and Aston University, working in partnership to ensure that CLEAR offers training pathways of progression. Together they have complementary skills and expertise that allows for the 'one stop shop' delivery of a fully integrated and holistic programme of applied research, education, training and professional development.



Source: <https://www.nwslc.ac.uk/>, GLP

Case Study: Prologis Education Hub at DIRFT

The Education Hub is a 9,551 sqft centre for logistics training and education that can be used by occupiers at Daventry International Rail Freight Terminal (DIRFT). The building has three distinct areas, a reception and café, three flexible training rooms and three smaller meeting rooms. The Hub is also home to the Prologis Warehousing and Logistics Training Programme (PWLTP), a digital learning and development programme aimed at training those leaving education and re-skilling the unemployed by equipping them with the knowledge needed to pursue a career in logistics.



Source: Stephen + George³¹, Prologis



The I&L sector can play a pivotal role as part of the Government's levelling up agenda

The Levelling Up Agenda

Traditionally, there has been a North-South divide in the UK whereby regions in the South³² perform better across a number of socio-economic indicators compared to regions in the North³³. The Government has repeatedly tried to address this issue for a long time with initiatives aimed at 'rebalancing' the economy and a Levelling Up White Paper due to be published in the coming months.

The I&L sector can play a pivotal role as part of the Government's levelling up agenda. In GVA terms, the South accounts for 63% of England's total GVA while the North accounts for only 37%. However, over the last five years I&L demand (net absorption) in the North has accounted for 70% of the country's total demand. Looking at a more granular level, a region such as the East Midlands that accounts for 7% of the country's GVA, has attracted 19% of the country's I&L demand in the last five years.

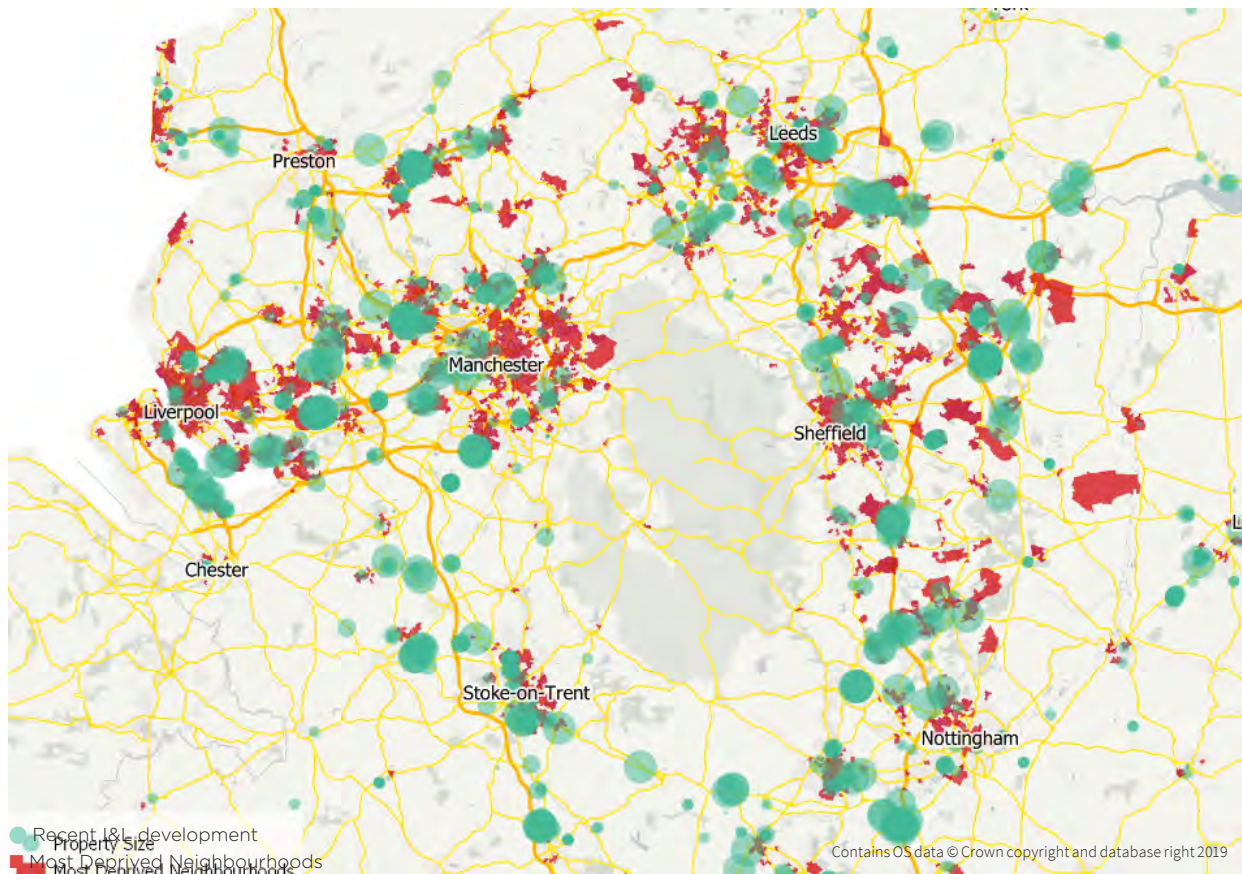
This strong growth in I&L in the North equates to circa 113 million sqft of net additional floorspace³⁴ or 117,000 jobs³⁵

over the last five years. As discussed above the sector provides a diverse range of jobs with higher levels of pay and GVA compared to the 'all sector' average. These jobs will be crucial in bridging the GVA and productivity gap between the North and South.

Another key focus is to provide better job opportunities for deprived communities outside the South East. The chart below show that the hotspots for I&L investment over the last five years are located nearby to deprived communities demonstrating the important role the sector can play in providing access to local jobs.

The Planning System is starting to recognise the link between I&L jobs and helping address deprivation. For example, in a recent called-in decision³⁶ for an I&L development in St Helens, the Secretary of State agreed with the Inspector that the jobs brought about by the development "would have a tangible benefit to the local economy and would provide an early opportunity to help address [...] deprivation issues".

I&L investment is located nearby deprived areas in the North



Source: Savills 2021

I&L investment can aid the delivery of new housing

Tackling the under-supply of homes has now been at the forefront of the planning system's objectives for many years. Major I&L investments are increasingly becoming integral to the delivery of new homes. Some key advantages of bringing forward I&L development alongside residential include:

- The strong I&L market can achieve healthy uplifts in land value and therefore can usefully contribute to funding strategic infrastructure such as new and improved motorway junctions and link roads. This infrastructure is also critical to enabling new residential development. Many other commercial uses on the other hand are viability challenged and in many cases are unable to make an upfront contribution to wider infrastructure provision.

- Given the strength of occupier demand, the I&L component of Garden Villages and other mixed use developments can be delivered quickly creating local job opportunities for the new incoming residential population. This can support higher

levels of self-containment (i.e. local people living and working locally) and higher usage of greener modes of transport (i.e. walking, cycling and public transport) given the reduced distances people are travelling to work. The creation of early jobs is also vital given other commercial uses such as office, retail and leisure uses within town centres typically take longer to come forward as they require a critical mass of housing to be in place to underpin their demand.

Some current examples of I&L investment helping to deliver residential development include:

- Linmere in Houghton Regis (see case study box)

- Hayes Nestle Factory (see case study box)

- Milton Keynes East, which has recently gained outline planning permission and is set to deliver 5,000 homes and 105ha of logistics led employment. The delivery of the employment land at J14 will open the site up and deliver the initial supporting infrastructure.

Case Study: Linmere in Houghton Regis

Linmere in Houghton Regis is a 5,100 unit residential development with an infrastructure cost of approximately £100 million and requiring an upfront payment of £45 million towards the M1/A5 link. The infrastructure payments significantly impacted viability and meant the development could not achieve the level

of returns required. However, the Site included 1.23 million sq ft of B8 which was sold to Lidl in a £90 million deal facilitated by Savills. This made the development almost cost neutral and enabled the consortium of owners to progress with servicing and selling the residential units.



Source: Houghton Regis News Desk, <http://www.hrnd.co.uk/2013/01/green-field-sites-around-houghton-regis.html>

Case Study: Hayes Nestle Factory

Following Nestle's announcement in 2012 to close the former coffee factory, the site is being regenerated to deliver over 1,386 new homes, alongside a 240,000 sq. ft industrial park. The scheme is being brought forward by SEGRO and Barratt

London and will create at least 500 permanent jobs and deliver over 3 hectares of public open space, a 1.3 km trim trail and 300 m of canal frontage for the community to enjoy.



Source: SEGRO

More than just warehouses and factories

While the office sector has outwardly embraced health and wellness as part of building design for some time, it has raced up the agenda within the I&L sector recently. I&L developers

and occupiers are increasingly adopting the WELL Building Standard which is delivering a more human-centric approach to the design of I&L premises.

The Seven Concepts of the WELL Building Standard

1. Air: Optimise and achieve indoor air quality. Strategies include removal of airborne contaminants, prevention and purification.

2. Water: Optimise water quality while promoting accessibility. Strategies include removal of contaminants through filtration and treatment, and strategic placement.

3. Nourishment: Encourage healthy eating habits by providing occupants with healthier food choices, behavioural cues, and knowledge about nutrient quality.

4. Light: Minimise disruption to the body's circadian rhythm. Requirements for window performance and design, light output and lighting controls, and task-appropriate illumination levels are included to improve energy, mood and productivity.

5. Fitness: Utilise building design technologies and knowledge-based strategies to encourage physical activity. Requirements are designed to provide numerous opportunities for activity and exertion, enabling occupants to accommodate fitness regimens within their daily schedule.

6. Comfort: Create an indoor environment that is distraction-free, productive and soothing. Solutions include design standards and recommendations, thermal and acoustic controllability, and policy implementation covering acoustic and thermal parameters that are known sources of discomfort.

7. Mind: Support mental and emotional health, providing the occupant with regular feedback and knowledge about their environment through design elements, relaxation spaces and state-of-the-art technology.



The attractiveness of a work location is largely determined by the presence of green space around it

This includes building design issues such as south facing offices, making best use of attractive views, natural lighting, improved ventilation, drinking water stations, creating break out and relaxation spaces for staff and in some instances the inclusion of health and childcare facilities.

External to the building there is an increasing emphasis on making better use of outdoor amenity areas such as natural spaces for increased biodiversity, sitting and relaxing, or for sports facilities such as running tracks and football courts for exercise. These trends are consistent with the results of Savills

What Workers Want survey which found that, generally speaking, the attractiveness of a work location is largely determined by the presence of green space near or around it.

These human-centric design approaches help to attract staff and keep them happy, which in turn drives productivity. As discussed, the sector's growth has meant that some workers who previously worked in other sectors such as office and retail, now work within I&L and demand these types of facilities. While the sector has increasingly become automated it is still very much being driven by people³⁷.

Case Study: Baytree, Dagenham Essex

The scheme is to include a variety of sustainable building features leading to WELL accreditation including external gym equipment, solar photovoltaics linked to battery storage, electric vehicle charging stations, air source heat pumps, enhanced use of

recycled and recyclable materials, prefabricated building elements, low energy LED lighting and a super airtight, insulated building envelope, all of which will be constructed within an enhanced landscape environment.

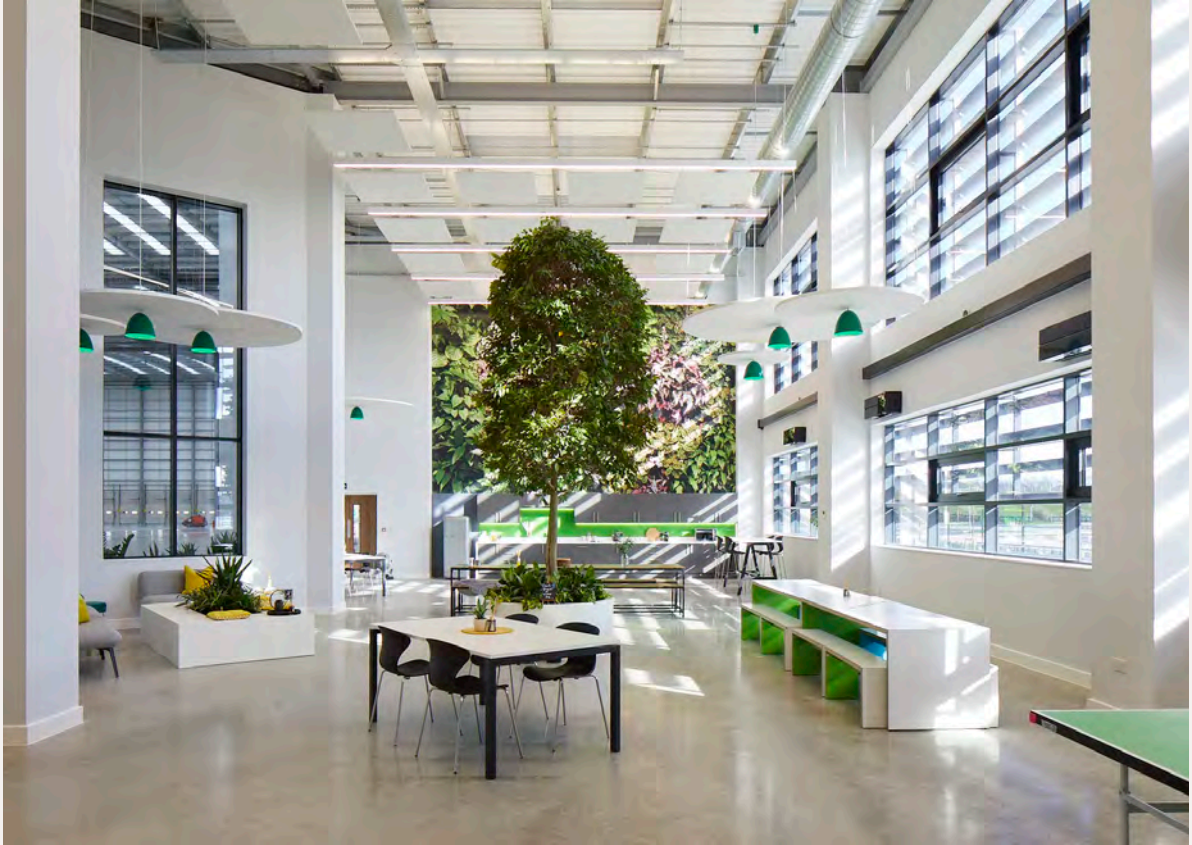


Source: <https://www.baytree.com/wp-content/uploads/2017/03/17-03-01-Baytree-commences-first-phase-development-at-its-East-London-....pdf>
<https://www.chetwoods.com/projects/baytree/>

Case Study: DC535 at Prologis DIRFT

DC535 has a living tree as the centrepiece in a light, bright atrium area designed to help employees relax and connect with nature. DC535 also has an employee

gym which makes use of natural light, and has a number of green spaces around the building to promote employee wellbeing.



Source: https://prologis.co.uk/wp-content/uploads/2021/01/200226_Prologis_DIRFT_0335.jpg

4. A Green Recovery 'Boxed'

To reduce carbon emissions, interventions have to be made in the construction, operation and demolition of buildings. This is leading to innovations across all phases of an I&L property's life cycle

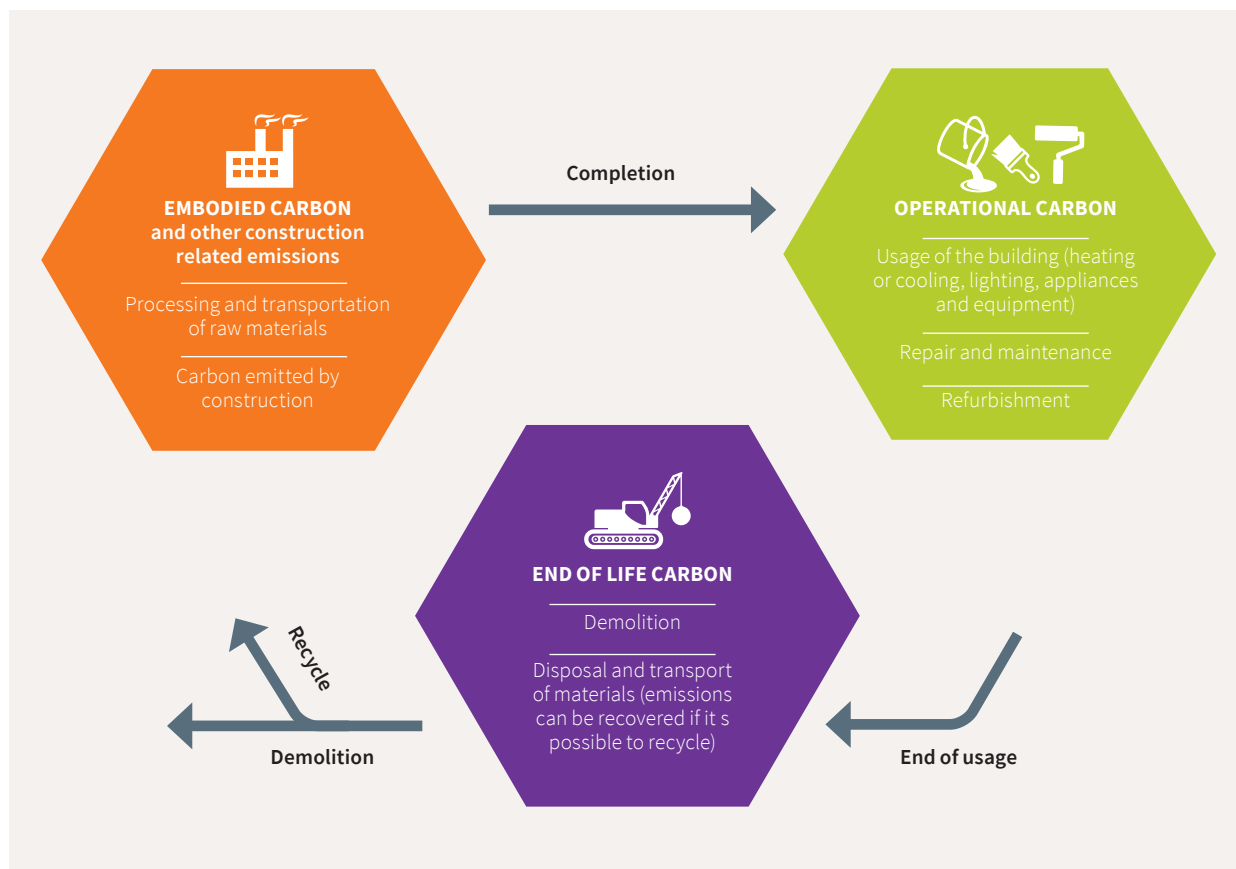
The Green Evolution of I&L Premises

In 2019, the UK Government and the devolved administrations committed to bring all greenhouse gas emissions to net zero by 2050, in line with recommendations made by the Committee on Climate Change. However, the Government has subsequently clarified this includes shipping and aviation emissions, which means that the rest of the economy needs to decarbonise much sooner, effectively by the very early 2030s. Reaching net zero greenhouse gas emissions requires extensive changes across the economy, and real estate has a key role to play. Every building has embodied, operational and end of life

carbon emissions and the built environment contributes 40% of the UK's carbon footprint.

This drive to lower emissions is pushing companies to take a close look at the real estate they occupy to make sure it is in line with Government carbon reduction policies. This is driving a range of innovative solutions that improve the environmental performance of I&L buildings. A Savills survey of logistics occupiers found that 'green/sustainability features' have climbed from 11th to the 6th most important warehouse feature³⁸.

The Sources of Carbon Across the Cycle of Property



Source: Savills

Embodied Carbon

It is accepted that in today's world, net zero carbon in construction cannot be achieved without an element of carbon offset, but initiatives are under way to further reduce the embodied carbon in construction, including:

- Design for long life, re-use and flexibility
- Using recycled materials or materials that contain a high level of recycled content
- More elegant, efficient design
- Modern methods of construction, off-site manufacture and design for less material and less waste
- Cement alternatives in concrete
- Alternative methods of concrete production
- Increased use of low carbon products, such as cross laminated timber, in lieu of high carbon materials such as steelwork

- Sourcing materials responsibly and as local as possible, with particular consideration to steel
- Using local workforce
- Liaising with contractors and suppliers to reduce their embodied carbon
- Engineering solutions to reduce imported hardcore to site

The embodied carbon footprint of some typically carbon-intensive materials and components can be reduced by using low-carbon building materials. Using cement replacement in concrete and recycled materials in new warehouse construction delivers significant environmental benefits, including minimising transportation-related greenhouse gas emissions and diverting a large percentage of construction waste from landfill. For example, GLP use GGBS (Ground Granulated Blast-Furnace Slag) in concrete as a cement replacement which reduces the embodied carbon of the concrete as GGBS is a bi-product from the steel industry³⁹.

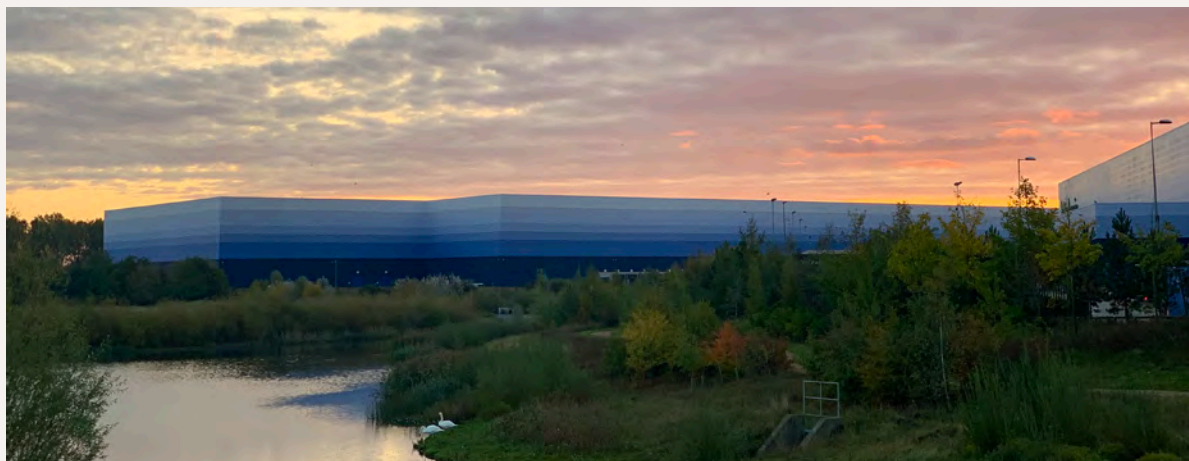
Case Study: GLP Magnitude 314, Magna Park

Magnitude 314 is 29,200 sqm warehouse with 1,500 m² of office area located at GLP's flagship logistics park Magna Park Milton Keynes. The development has been officially verified as the world's first Net Zero carbon for construction in line with the UKGBC Net Zero Carbon Buildings Framework Definition. The building was designed to WELL principles and has achieved both a BREEAM Excellent and EPC A rating. Overall, the design has resulted in a 25.8% reduction in embodied carbon compared to a standard logistics building.

Key members of the building supply chain including material manufacturers and component suppliers were asked to provide a complete breakdown and assessment of the products being supplied including details of their origin, embodied carbon value and whether the product

can be reused or recycled. Chetwoods, Thrive and Circular Ecology, along with other leaders in their fields were engaged to help the design team and wider supply chain collaborate and reduce as much embodied carbon as possible.

The building was designed to be flexibly adapted by future occupiers. The roof structural capacity allowed for future installation of Solar PV, once an occupier was in place and their energy load was calculated. Magnitude 314 is now occupied by Royal Mail. The delivery of Magnitude 314 also performed high in social value terms, resulting in over 39% of added social value against a contract value of £12 million. This was well above the expectation of 10-15% of social value delivery for similar construction projects.



Source: GLP

Operations

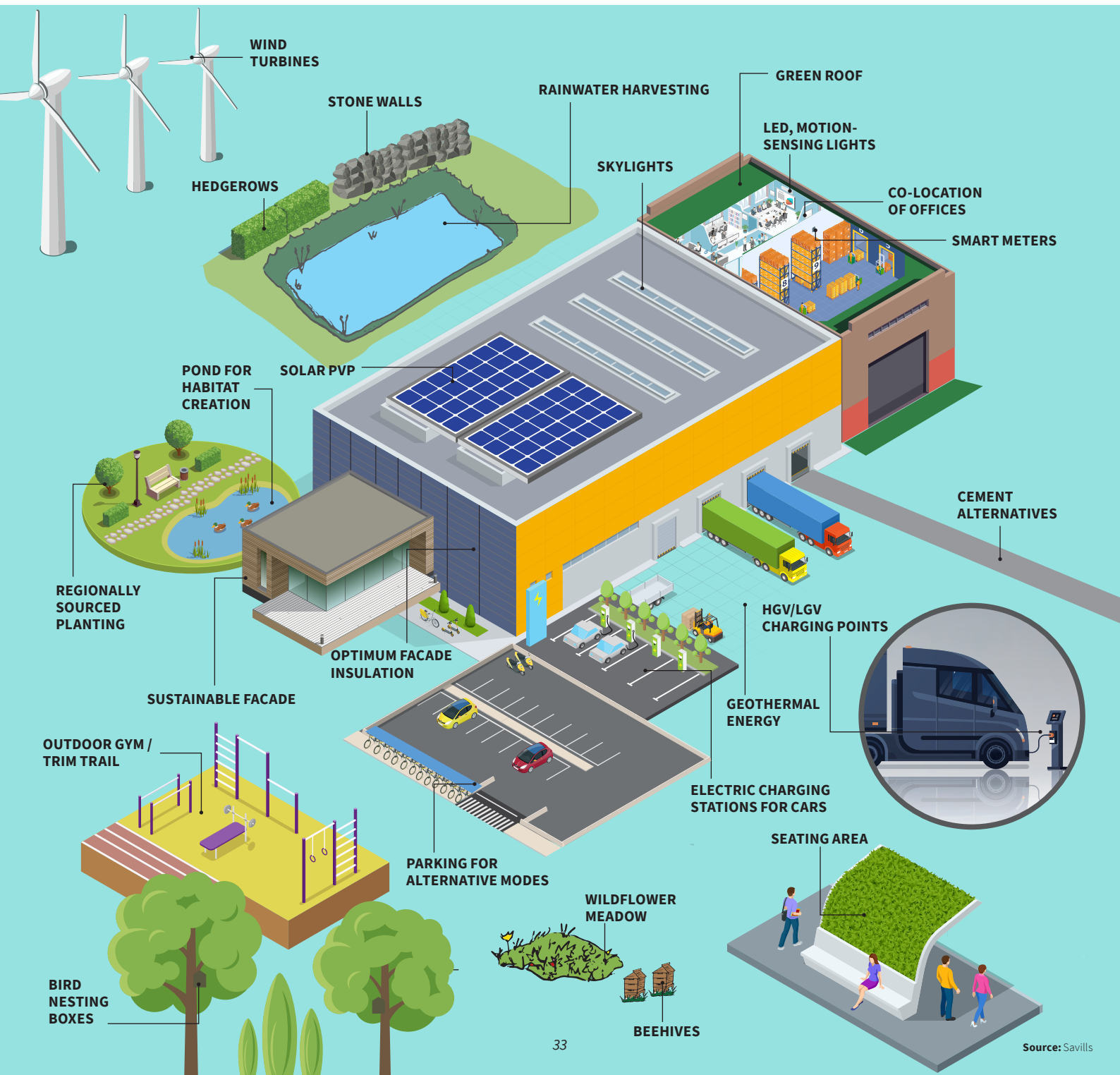
Energy efficiency during operations can be achieved by addressing both energy demand and energy supply. The former is about reducing the inherent energy demand a building requires to operate, while the latter is about decarbonising the development's energy supply via the use of renewable sources.

The energy demand of large I&L sites has generally been increasing in recent years, driven by growth in certain

occupier types such as data centres and cold storage, both of which have heavy cooling demands. This trend is expected to continue over the next decade as we see the increased use of automation and the electrification of transport.

The image below outlines a number of solutions that improve the environmental performance of an I&L building during its operational phase.

The Green Evolution of I&L units





Lighting is typically one of the largest contributors to a warehouse's energy demand

Reducing Energy Demand

The UK Green Building Council (UKGBC) states that reductions in energy demand and consumption should be prioritised over all other measures prior to implementing on-site renewable energy sources⁴⁰. I&L operators are achieving this in a number of ways.

■ **Lighting** is typically one of the largest contributors to a warehouse's energy demand. Below are some popular solutions:

a. **Skylights and clerestory windows** lower electricity use and associated greenhouse gas emissions and improve indoor environmental quality for warehouse personnel. Skylights avoid light pollution.

b. **LED** can lower a building's total energy consumption, as well as reduce heat generation. A transition to LED technology can cut consumption between 60-80% compared to other lighting types⁴¹. LED bulbs also last much longer than all other forms of lighting, which means replacing lighting far less often, resulting in significant cost savings.

c. **Sensors**, such as motion-sensing lights, as well as sub-meters on machinery, appliances and other equipment. Motion sensors which switch energy-efficient LED lighting on and off as workers move through the space result in a 53% energy reduction from conventional LEDs. For example, all Panattoni buildings include 15% roof lights, and their intelligent lighting systems result in a reduction in electricity consumption by up to 70%⁴².

■ **High-reflectance roof membranes** such as white thermoplastic polyolefin (TPO) roofing can reduce the building's energy consumption by reflecting more sunlight, with solar gain during the day and loss of heat at night. Benefits include lower indoor temperatures and greater comfort for occupiers, reduced Heating, Ventilation, and Air Conditioning (HVAC) costs, and reduced cost of roof maintenance and replacement.

■ **Compounds and chemicals with non-petroleum bases** such as low-emitting sealants, adhesives and carpet systems, also help to conserve non-renewable resources and improve indoor air quality for a healthier working environment.

■ **Parking for alternative modes of transportation**, for example bicycle, eScooters and eBikes, EV, hybrid and carpool vehicles, encourages lifestyle choices that reduce carbon emissions and promote health and wellbeing.

■ **Smart meters** allow occupiers to track and reduce energy consumption.

Improving Energy Supply

Using renewable energy sources and becoming self-sustainable is increasingly a target for I&L occupiers as it decreases operational costs as well as environmental impacts.

The flat roofs of large I&L buildings are ideal candidates to house solar photovoltaic panels (PV). According to Savills' research and depending on the internal systems, new warehouse development can be nearly energy independent if at least 40% of the roof space is used for PV installation. New development can be designed so that solar PV can achieve a much higher roof coverage. For example Parker Steel's storage facility at Shoreham Port was retro-fitted with around 95% of the roof surface covered by solar PV.

Power resilience is already raised by some occupiers as a growing concern but the full extent of this risk is generally not well understood within the sector. Many organisations overlook the fact that power may not be available at an affordable price without new contract structures or on-site generation. We expect power availability to become a more pressing subject as constraints start to crop up across occupiers' portfolios with the adoption of new technologies that are hungry for electricity, and the roll out of electric vehicles, electric heating and wider decarbonisation.

Distribution Network Operators' (DNOs') strategies tend to respond well to national policy objectives, but lack alignment with local government plans. This can result in a disconnect between where local authorities are planning growth and where DNOs are investing, which can lead to site allocations lacking sufficient energy capacity. This is one area where much more work is needed to align the power grid with opportunities to decarbonise. To this end, engagement in Local Plan making would be welcomed.

While constraints in energy availability can deter development and slow the growth of the I&L sector, they are also pushing developers and occupiers to come up with innovative sustainable solutions to reduce their reliance on the power grid, especially when availability is constrained at peak times. A solution is to decentralise a site's energy supply by building in a private network. This is likely to mean equipping sites with battery storage and on-site energy generation like solar, wind or hydrogen, so that they can more effectively manage on-site demand.

Below are some of the popular solutions:

■ **Solar PVP** can be installed on roofs and provide significant energy capacity. For example, DPD's Hub 5 in Hinckley, Leicestershire, has a Solar PV system comprising over 6,000 panels providing an output of 2.4 MW. The power generated by the system enables the hub offices to operate off grid during daytime working hours. Barriers to installation of solar PV will need to be addressed in order to meet net zero targets.

■ **Borehole thermal energy storage** stores heat underground during warm months and pumps it back into the building during winter months to meet heating demands.

■ **Electric air source heat pumps** also offer a solution to drive down the environmental impacts of buildings. They use electricity to move ambient heat energy into or out of a building's interior, enabling Heating, Ventilation, and Air Conditioning (HVAC) systems to operate without burning fossil fuels.

■ In some circumstances, **water source heat pumps** might be attractive where a large water body is nearby and the infrastructure can be installed in the water body without ecological harm.

■ **Hydrogen fuel cells** generate power without carbon emissions – the only emission being water vapour – and can be applied to a broad spectrum of transport vehicles including trucks used for distribution and automated forklifts used to shift goods around within I&L facilities. This technology provides improved energy density and allows for significantly longer driving times compared to electric vehicles.

■ **Wind farms** offer a source of green energy typically generated off-site. Occupiers can supply their site with this form of renewable energy by choosing energy providers that source electricity from wind farms.

Case Study: DPD, Symmetry Park, Bicester

The 60,000 sq ft hub at Symmetry Park, Bicester is Tritax Symmetry, and DPD's, first 'net zero carbon in construction' building, as regulated by the UK Green Building Council (UKGBC).

Locally sourced A and A+ rated construction materials were used wherever possible, with associated low embodied carbon impact. Timber was also sourced from certified and renewable Forestry Stewardship Council (FSC) approved sources. Low energy and zero carbon design principles were incorporated into the scheme from the start. Reduction in energy demand is achieved using efficient fabric and shading design to reduce heating and cooling demand, and natural daylighting to reduce artificial lighting demand.

The unit also implemented smart energy/building management systems to provide automatic monitoring and targeting of all sub-meters to promote energy management and deliver lower consumption. This measure alone reduced the inherent energy demand of the building by approximately 12%, and the carbon dioxide emissions by approximately 40%. The building design incorporates air source heat pumps for heating and cooling, 5,500 sq ft of solar panels (25% of useable

roof area), while the design and building materials used help deliver an 82% improvement in airtightness. The remaining useable roof area is designed to take further solar panels as required by any increase in consumption from DPD in the future, most likely through additional EV charging points. The site also boasts 30 electric vehicle (EV) charging points with ducts provided to the service yard and car park for future installation of further car, van and HGV charging points.

The landscape strategy prepared for the development added to the existing ecological resource through the creation of new habitats interconnected with the existing retained habitats. This included the creation of new seasonal wet areas to enhance the local amphibian population, and to provide an aquatic habitat resource on the Site which was previously not present.

Overall, there was a reduction of 500 tonnes of carbon in the construction process, with the remaining carbon being offset through the use of an accredited tree planting scheme in Northamptonshire with over 1,000 trees being planted. In addition, a wind project in India was sponsored, helping develop renewable energy provision in the country.



Source: Tritax Symmetry

Water Management

Solutions to reduce the use of fresh water include:

- motion-activated faucets,
- rain water harvesting,
- grey water recycling,
- low-flow toilets,
- waterless urinals,
- captured rainwater for irrigation.

Towards Greener Distribution Networks

The sector's drive to decarbonise doesn't stop at its facilities. The largest contributing sector to the UK's carbon emissions at 27% is transport⁴³. Even though HGVs and vans account for a smaller share of emissions than cars and taxis, they are still linked to over a third of all road transport emissions. This means that the I&L sector can make a significant contribution to the reduction of the UK's carbon emissions by decarbonising its distribution networks.

Policies such as zero and low emission zones, and the recent Government's pledge to phase out the sale of petrol and diesel HGVs by 2040 are strong drivers for the sector's decarbonisation. Based on Savills research we expect that the commercial sector will transition faster to more sustainable transport than private households. This is due to the increasing costs of running commercial vehicles

as a result of policy changes discussed above, which will favour the switch from conventional fuel to EVs or alternative fuels such as compressed natural gas.

Compressed natural gas, although a fossil fuel, is considered a low carbon alternative to diesel and is seen as a stepping stone towards hydrogen. This is because of similarities in the type of engines used and the way the gas is handled.

For example, in 2020 John Lewis Partnership announced that they will convert their 600 HGV fleet to biomethane by 2028. CO2 savings from each truck are estimated to exceed 100 tonnes per year. These gas trucks have also the benefit of being quieter, which is especially important for urban deliveries.

The market for HGV EVs is still in its infancy, given the challenges arising from their large size and the considerable distances they travel. However, EVs can be more easily deployed for last mile deliveries, given their smaller load and the shorter distance travelled. They also contribute to make urban areas healthier, improving air quality and reducing noise pollution.

I&L occupiers are driving this change by increasing the adoption of EVs and natural gas powered fleets.



DPD is building the largest all-electric delivery fleet in the UK, with over 700 electric vehicles operating throughout England, Scotland and Wales. In July 2021 Oxford has become DPD's first all-electric city, meaning that all parcels delivered by DPD in the city are carried by EVs. This move is part of DPD's wider initiative that will see them go fully electric in 25 cities by 2025, backed by a £111 million investment in EVs. The initiative will deliver 42,000 tonnes of carbon dioxide savings for the UK⁴⁴.



Amazon has committed to reaching net zero carbon by 2040 and has announced that it is on a path to powering its global operations with 100% renewable energy by 2025. The company has over 500 e-vans operating in the UK and has installed more than 800 electric charging stations across its UK sites, with hundreds more to follow.



UPS is investing in 10,000 electric vans to be rolled out across the UK, Europe and the US between 2020 and 2024⁴⁵.



DHL Express has pledged to make any purchase of new courier vehicles electric in order to achieve a 100% electric UK-wide fleet by 2030. The company has also been experimenting across different transport modes. In 2020 it launched its waterborne delivery service on the river Thames in London and is currently exploring the use of fully electric cargo planes for regional deliveries.



Hermes' parent company Otto Group has committed to become carbon neutral by 2030. Hermes is making a move to EVs to deal with parcel pick up and deliveries from the Hermes ParcelShop service. It is also increasing its fleet of compressed natural gas fuelled vehicles, becoming the largest fleet of this kind in the UK parcel sector.

Enhancing Biodiversity

I&L developments are increasingly delivering landscape improvements that enhance the biodiversity of an area. The delivery of 'pocket parks' is becoming more and more popular. These are green spaces that can be found within or adjacent to an I&L development that provide outside relaxation space for workers and can also benefit the wider local community. For example, SEGRO's pocket park on the Slough Trading Estate has bee hives, hard standing for street food and solar smart benches which provide free WiFi and USB and wireless charging. At Prologis Park in Hemel Hempstead, a pocket park has been created by rejuvenating a neglected area of land and turning it into a green community space, complete with footpaths, landscaping and benches which can be used by the adjoining nursery and residents⁴⁶.

A development delivers biodiversity net gain (BNG) if it contributes to an overall increase in biodiversity value measured using Defra's biodiversity metric. The Environmental Act sets total BNG requirements at 10% above the pre-development level. BNG can be achieved by delivering habitat creation and/or enhancement on-site, off-site or by purchasing credits. Savills' involvement in a number of I&L schemes has shown that:

- There is a shortage of specialist ecological expertise to advise both developers and local planning authorities;

- There is a need to assess biodiversity earlier in the process than has traditionally been the case;

- All land that is developed, even for landscaping, is considered to be a BNG loss and no account is taken of other benefits, such as land remediation;

- It will be necessary to assess whether additional land should be acquired to support BNG strategies, as on-site delivery of BNG is cheaper than off-site solutions or payments; and

- LPAs will need to develop systems for allowing purchase of credits and to identify suitable BNG land.

The I&L sector needs to adapt to the environmental "damage cost" approach. Some local planning authorities are already requiring 20% BNG and Government has been trialling metrics for assessing air quality impacts and will extend this approach to include other natural capital impacts, such as nitrate neutrality, water and waste.

The sector should participate in Government consultations on how these metrics will impact I&L. Development of greenfield sites in particular will become more complex and costly unless it is possible to commit through the planning process to environmental net gains in both building design and operation.



Case Study: Example of Developer's Sustainability Commitments – St. Modwen

Net carbon reduction



What it is

To help achieve the global goal to stop average temperatures rising more than 2 degrees, the UN wants everyone – from individuals to global corporations and governments – to decrease the damage to our planet.

Why it's important

The building and construction industry accounts for around 40% (UN) of the world's carbon emissions. Government, local authorities, partners and customers have expectations and targets which must be met or exceeded but a global step-change is needed.

How can we help

- Target ongoing carbon reduction at a business unit and group level
- Embrace design principles that deliver long-term, low-carbon and low-carbon enabled buildings
- Integrate carbon reduction into business policies.

Overarching ambition

Be operationally net zero carbon by 2025 and fully net zero carbon by 2040.

Biodiversity & sustainable environments



What it is

Population growth and social trends mean humans are impacting our natural environment in unprecedented ways. From the destroying of distant rainforests to dying out UK insect breeds and the way we all handle waste, change is high on the agenda.

Why it's important

Our company changes the landscapes of both brown- and greenfield sites so we are directly impacting nature and the land around us. We want to embrace making a virtue of a progressive approach to our natural environment.

How can we help

- Boost biodiversity at our schemes
- Make positive use of the community spaces we create to improve biodiversity
- Only use materials from sustainably managed sources
- Reduce waste by maximising product and material use throughout lifecycles.

Overarching ambition

Be ready by the end of 2020 to achieve a net biodiversity gain of at least 10% associated with all development activity.

Health & Wellbeing



What it is

Good physical and mental health is something everyone strives towards in the pursuit of a happy life. A healthy body and mind allow us to enjoy our surroundings, feel good about ourselves and achieve more.

Why it's important

We want to play our part in helping to support a healthier, happier and engaged workforce because it drives sustainable performance. We also have the potential to impact our customers and communities – through places and products – to boost their wellbeing and enrich their lives.

How can we help

- Support wellbeing programmes within our workplace
- Address the wellbeing of communities in all development plans
- Consider and plan for the wellbeing of contractors and partners.

Overarching ambition

Be bold in our pursuit of wellbeing to boost the happiness, health and satisfaction of our people. Make a meaningful, positive impact on the health and wellbeing of the communities we operate in and the places we deliver.

Responsible operating practices and partnerships



What it is

Having the right operating practices ensures that our responsible approach to business is reflected in the way we carry out our business. It also means working with and influencing our supply chain and partners to ensure quality, mutually beneficial outcomes.

Why it's important

We are many times larger than ourselves through the activities we carry out and the supply chain we use. This gives us the chance to positively affect working practices, from payment terms and job creation to education and our impact on the natural environment.

How can we help

- Safety first for ourselves, our partners and our customers
- Establish and maintain a framework for supply chain alignment, ensuring we work with partners to collectively meet our responsible business goals
- Build and maintain positive partnerships and effective stakeholder engagement and communications
- Build and maintain a culture.

Overarching ambition

We can only fulfil our approach to responsible business by working with our supply chain. During 2020, launch a charter to our partners to inspire, set goals and underpin responsible ways of working.

Case Study: SEGRO's Bee Hives

SEGRO have made bee hives a common feature of many of their developments, with over 150 hives across their portfolio. Each hive holds as many as 50,000 bees during the

peak harvesting season, and these bees visit over two million plants within a two mile radius, assisting with the pollination of local plants and crops.



Source: https://www.segro.com/esg/case_studies/our-environment/biodiversity?sc_lang=en

End of Life

Demolition and rebuilding are carbon intensive activities. Transport and disposal of the old materials produces emissions and wastes the embodied carbon that went into the construction of a property in the first place. Giving a new use to an existing building typically arises as a response to changing economic conditions, so that declining sectors can make space for emerging ones.

Modern I&L buildings have the advantage to be lightweight structures which are highly adaptable for a large range of uses. Since they are built for production or storage purposes, they are not typically visited by the general public and their lighting and interior design requirements are much simpler.

The lack of solid walls means that internal spaces can be easily reconfigured and readapted to host a diverse range of light industrial, manufacturing and logistics companies with

limited capital costs. They can also be repurposed to provide lab space, leisure facilities, data centres and even health facilities. Temporary hospitals were an essential component of the Government strategy to counter the Covid pandemic. Examples include Exeter's Nightingale Hospital built on a former Homebase site in Sowton Industrial Estate and Sunderland Nightingale Hospital built as a conversion of a former industrial building.

A well designed I&L building should also be easy to deconstruct at end of life, making materials available for reuse or recycling. Steel frames used in I&L properties are much more easily recycled than concrete which is more common in other commercial uses. When delivering a new building, the cataloguing of its materials and components make it easier to pinpoint and identify items of value that can be captured for potential reuse at the building's end of life.

5. Final Recommendations

This report has evidenced the need for an improved method to estimate future I&L land demand. It is clear that demand within the sector has been much higher than supply for most of the last decade which has resulted in extremely low availability and exponential rental growth as occupiers compete for limited available stock. In order for the sector to grow to its full potential and generate the jobs and investment the national economy needs, the planning system has to better estimate future land demand. It is recommended that the Savills and St. Modwen ‘suppressed demand’ methodology is incorporated within the NPPG to help inform Local Plans.

The evidence within this report also supports a number of previous BPF recommendations outlined in its Employment Land Manifesto (July 21)⁴⁷ as discussed below.



Recommendation 1 of the Employment Land Manifesto

Introduce a Presumption in Favour of Logistics Development within the NPPG when precise criteria are met, such as:

- **Easy access and proximity to the strategic highway network.**
- **Ability to provide effective access by non-private car to suit shift working patterns.**
- **Located away from residential development/where there is no unacceptable impact on residential amenity to allow for uninterrupted 24 hour working.**
- **Capable of accommodating large scale buildings in terms of both footprint and height.**
- **Sites which suit the future occupier’s needs.**

The Local Plan process is too slow to respond to significant market changing events, such as the COVID-induced acceleration in the growth of e-commerce. As evidenced in the ‘An Economic Powerhouse’ chapter, the planning system has failed to provide a sufficient level of I&L land to meet demand. This has resulted in the national I&L market becoming supply-constrained for the last seven years, as signalled by availability dropping below the equilibrium threshold of 8%, and high rental growth at twice the rate of inflation.



Recommendation 2 of the Employment Land Manifesto

Ensuring Local Plans allocate logistics sites in the right locations to respond to a broad range of market needs.

The optimal location for I&L occupiers allows them to be close to their suppliers as well as their end customers. For this reason, access to the strategic road network is critical, as it reduces transportation time, costs, and carbon emissions. The strategic road network also allows a site to expand their catchment of intermodal freight facilities, which are critical nodes within logistics networks. An optimal logistics site is also in easy reach of a workforce with a range of skills, and is close to worker amenities. It also requires good availability of utilities, services, and broadband. A dialogue between Distribution Network Operators (DNOs) and Planning Authorities should be encouraged to ensure power is supplied in locations where I&L development is being planned. Employment allocations should be in locations that allow I&L operators to work 24/7 without impediments.



Recommendation 3 of the Employment Land Manifesto

Ensuring the industrial and logistics sector is recognised for its focus on ESG: making a valuable contribution to the Government’s Green Industrial Revolution and generating social value.

As discussed in the ‘Growing Social Value Credentials’ chapter, the I&L sector supports large and diverse supply chains which generate significant economic and social value benefits. As the sector continues to expand so will the number of apprenticeships and training opportunities it supports. The sector is also heavily invested in the central and northern parts of the country and therefore is playing a critical role as part of the Government’s ‘Levelling-Up’ agenda.

As evidenced in the ‘Green Recovery ‘Boxed’’ chapter, I&L buildings are delivering on ESG objectives across all stages of a property’s life cycle. Reduction in embodied carbon is being achieved in numerous ways, such as via the use of recycled materials, cement alternatives in concrete, and reliance on local labour force. During the operational phase, energy efficiency can be achieved by addressing both energy demand and energy supply. The former is about reducing the inherent energy demand a building requires to operate, which can be achieved in numerous ways (for example, improving lightings, or installing smart sensors and sub-meters; while the latter is about decarbonising a development’s energy supply via the use of renewable sources such as PV, wind, etc.). Finally, with regards to the end of life phase, modern I&L buildings have an advantage of being lightweight structures which can be adapted for other uses. They can also be easily repurposed or materials can be catalogued to allow for potential reuse in the future.



Recommendation 7 of the Employment Land Manifesto

Introducing an Employment Land Delivery Test to ensure that a commensurate amount of employment land is brought forward to counterbalance housing and that any employment land lost to other uses is delivered in the right locations. If a local planning authority failed to meet the delivery test, a presumption in favour of sustainable logistics development could be engaged.

I&L facilities and their supply chains support the functioning of our economy and the way we live our lives. One of the biggest transformations to our lifestyles in the past 15 years has been the rise of e-commerce. In 2006 online shopping was at 3%, while today this share has grown to 26% and is expected to increase even further. The growth in online shopping has significant implications on future I&L demand given that e-commerce requires over three times the logistics space compared to traditional brick-and-mortar retailers. Population growth is a key driver of this rise in e-commerce as more people mean increased online spending. Based on Savills future I&L demand estimation, Government housing targets and I&L space requirements per housing unit, we know that about half of future I&L demand will be linked to housing growth. This means that Government should not plan for housing growth without also planning for I&L growth.

Acknowledgements

Commissioning Team



The British Property Federation (BPF) represents the real estate sector, an industry which contributed more than £116bn to the economy in 2020 and supported more than 2.4 million jobs.

We promote the interests of those with a stake in the UK built environment and our membership comprises a broad range of owners, managers and developers of real estate as well as those who support them. Their investments help drive UK economic success, provide essential infrastructure and create great places where people can live, work and relax.



UKWA Limited is the United Kingdom Warehousing Association, a trade association with approximately 900 Members. We represent a sector that is worth £20 billion to the UK economy, has grown by 32% in the past six years, and employs over half a million workers. The Voice of the Warehousing & Logistics Industry, UKWA engages with policymakers, the media and other high-profile stakeholders, to represent the views of our Members. We promote and share best practice and our mission is to help Members operate safely, ethically and profitably, while safeguarding industry standards. UKWA Members benefit from a wide range of valuable services from professional business advice and strategic support to networking opportunities and discounted offers from partnering specialists and associates.



GLP is a leading long term global investment manager and business builder in logistics, data infrastructure, renewable energy and related technologies.

Our combined investing and operating expertise allow us to create value for our customers and investors. In the UK, we have over 33 years' experience in developing best in class logistics units and more than £2.3 billion in assets under management in 42 properties in our operating portfolio with key schemes such as Magna Park Milton Keynes, Magna Park Lutterworth, G-Park Biggleswade and G-Park Doncaster.

Across the United Kingdom, our operating portfolio consists of just under 12 million sq ft in key strategic logistic locations which are leased to blue chip customers such as John Lewis, Royal Mail, Amazon, DHL and Bleckmann Logistics.

We are committed to a broad range of environmental, social and governance (ESG) commitments that elevate our business,

protect the interest of our shareholders and investors, support our employees and customers and enhance our local communities. To learn more about our UK operations, please go to eu.glp.com



St. Modwen is a property developer focused on logistics, housebuilding and master developing sites. The St. Modwen Logistics business unit develops and manages urban and big box warehouses on key logistics corridors and conurbations. Our Parks serve the needs of customers to expand their businesses, employ local people and support economic growth. Our customers include global logistics and e-commerce organisations as well as significant national and regional enterprises. The Parks showcase the St. Modwen Swan Standard – a set of industry-leading sustainable development guidelines with a focus on responsible building practices.

St. Modwen is committed to ESG, our Responsible Business approach includes a set of ambitious goals in six strategic areas where we can make a sustained difference to society, our stakeholders and the environment: biodiversity and sustainable environments; net carbon reduction; diversity and inclusion; education and future skills; health and wellbeing; and responsible operational practices and partnerships. This includes our aim to be operationally net zero carbon by 2025, and fully net zero carbon by 2040.



Tritax Symmetry is Tritax Big Box REIT's dedicated logistics developer, specialising in delivering best-in-class greener buildings and an unrivalled choice of locations and scale. With offices in London, Northampton and Manchester, Tritax Symmetry has a land portfolio of 4,150 acres, capable of accommodating 40 million sq ft of logistics space.

The company is dedicated to targeting carbon neutrality on the construction of all new buildings. Its commitment to best-in-class sustainable construction methods will give customers the operational advantages they demand. Further information on Tritax Symmetry is available at www.tritaxsymmetry.com

Tritax Big Box REIT plc is the only listed vehicle dedicated to investing in very large logistics warehouse assets ("Big Boxes") in the UK and is committed to delivering attractive and sustainable returns for shareholders.



Founded in 1987, IM Properties has established itself as one of the UK's largest privately-owned property companies with an enviable track record of delivery across all sectors of commercial real estate.

Originating from the IM Group, the company has developed over 10 million sq ft of commercial real estate becoming renowned in the industry for the consistent delivery of strategically located, award-winning schemes.

Located in the Midlands, the business is focused on a sustainable future in all sectors in which it invests, develops and manages, including offices, logistics/industrial and residential. Our strategic framework centred on People, Planet and Place is pivotal to our future ambitions for responsible development and innovative growth, to ensure both long-term social and economic value to the communities within which we operate, underpinned by strong environmental credentials.

With a customer-focused approach to development, IM Properties is a market leader in quality building design, place-making and sustainable construction, developing schemes for a wide range of clients, including blue-chip customers from across the globe; all delivered with local market knowledge and expertise.

We are an agile organisation that is committed to securing high quality, long-term investments through a fair approach to business. Our management team uniquely combines the skill set and creativity of a property company with the financial resource of a fund which, over its lifetime, has delivered a diverse and high prized portfolio of institutional standard.



Based in Rugby, Newlands Developments is a specialist industrial and logistics developer with a long history of success and sound professional ethos built up over the last 20 years. It's well-known senior management team, who have worked

together for many years, have a solid track record and is responsible for delivering over 50 million sq ft of development.

Newlands expertise is centred around taking large, often complex schemes through the planning process and then using an in-house team of professionals and capital to implement infrastructure contracts, often in excess of £100 million. Newlands are bringing forward numerous sites across the country with a concentration of sites in the East Midlands.



SEGRO is a UK Real Estate Investment Trust (REIT), listed on the London Stock Exchange and Euronext Paris, and is a leading owner, manager and developer of modern warehouses and industrial property. It owns or manages 8.8 million square metres of space (95 million sq ft) valued at £15.3 billion serving customers from a wide range of industry sectors. Its properties are located in and around major cities and at key transportation hubs in the UK and in seven other European countries.

For over 100 years SEGRO has been creating the space that enables extraordinary things to happen. From modern big box warehouses, used primarily for regional, national and international distribution, to urban warehousing and light industrial property located close to major population centres and business districts, it provides high-quality assets that allow its customers to thrive. SEGRO's customers include major businesses such as DHL, Amazon, Mars, Royal Mail, British Airways, Brompton Bike, Ocado, Tesco, Netflix, DPD and Equinix that operate in a range of sectors from parcel delivery to ecommerce, retail to TV and film and manufacturing to data centres.

A commitment to be a force for societal and environmental good is integral to SEGRO's purpose and strategy. Its Responsible SEGRO framework focuses on three long-term priorities where the company believes it can make the greatest impact: Championing Low-Carbon Growth, Investing in Local Communities and Environments and Nurturing Talent.

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Special Thanks

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Savills colleagues: Toby Green, Emma Andrews, Nick Green, Dan Smyth, Dan Jestico, Thomas McMillan.

Footnotes

¹Under the ONS SIC 2007 Industrial Sections of Manufacturing and Transportation & Storage

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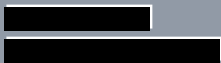


Savills Research

We're a dedicated team with an unrivalled reputation for producing well-informed and accurate analysis, research and commentary across all sectors of the UK property market.

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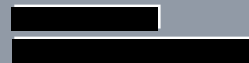
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Appendix 4 – Letter from Jonathan Atherton, Head of Savills Industrial and Logistics Agency North

22 July 2022
Our Ref: L220722



Jonathan Atherton BSc MRICS

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DL: [REDACTED]

Belvedere

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savills.com

**Warrington Industrial Market
Statement Submitted in Connection with Hearing Statements
for the Warrington Local Plan Examination in Public
Statement Submitted on behalf of St. Modwen Developments Limited
Introduction**

I write with reference to the promotion of the land to the east of Junction 21 of the M6 as part of the emerging Warrington Local Plan to provide an overview of the Warrington Industrial market in support of the allocation of the land for employment uses.

I have been a member of the Royal Institute of Chartered Surveyors ('RICS') for over 25 years and have been the Head of Savills Northern Industrial and Logistics business for 12 years. I have significant experience advising developers, landlords and occupiers for Industrial and Logistics space and advise the following parties who are significant contributors to the Industrial and Logistics market:

- Prologis
- GLP
- Exeter Property Group
- Panattoni
- Ao.com
- Wincanton
- Mirastar
- Legal and General
- Royal London

I have a strong knowledge of the Warrington Industrial and Logistics market and have advised on approximately 2m sq. ft of floorspace in the town.

The Warrington Industrial Market

The success of Warrington as an Industrial and Logistics location has been well documented. Its location in the heart of the region provides links to the major conurbations of Liverpool and Manchester via the M62, the M56 further south connecting the town to Cheshire and Greater Manchester, and the M6 running north to south providing links to Lancashire, Staffordshire and Greater Manchester.

The site will provide access to the whole region and beyond within a 45 minute drivetime, a statistic which has not gone unnoticed by companies seeking to locate a Regional Distribution Centre ('RDC') in the region. The locational characteristics together with its proximity to the high population belt of Liverpool, Warrington and Manchester, has encouraged developers to construct prime logistics units that have attracted some of the key national occupiers to the area.

There is not better example than the Omega development at Junction 8 of the M62. This strategic development has attracted some of the biggest occupiers in the Industrial and Logistics World, namely:-

- Amazon
- Royal Mail
- Hermes
- Asda
- Home Bargains
- Iceland
- THG
- Brakes
- Travis Perkins

All occupiers have taken buildings in excess of 300,000 sq ft, attracted by the attributes highlighted above and by the deliverable development platform create.

With Omega all but full, its clear that Warrington will have few opportunities to attract and deliver similar development opportunities

It is worthy of note that the supply of industrial and logistics space in the North West has fallen by 23% in the last 12 months. Available space now stands at 2.65 million sq ft across 13 units, equating to just 0.47 years' worth of supply.

Just 43% of supply is of Grade A standard. Of the remaining space, a large proportion does not reach the EPC standards set out by the government meaning that these units will need to undergo comprehensive refurbishments in order to be lettable in the future.

The fall in supply comes as take-up for the first half of the year reaches 4.22 million sq ft, 103% up on the H1 long term average, 32% of space transacted has been Grade A speculatively developed space, 51% has been Grade A space and the remainder Grade C space, demonstrating a clear preference for better quality space.

The site at Junction 21 would satisfy the criteria for the larger footprint buildings in excess of 300,000 sq ft:-

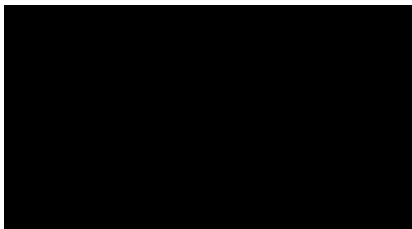
- Large development platform
- Physical characteristics – flat, regular shaped serviced sites
- Motorway access
- Land ownership
- Adequate labour supply

The area between M56/M6/M62 intersection is widely acknowledged as the prime location in the North West, with over 7.5m sq ft of space being developed in the last 10 years. With the continued strong market conditions being experienced in the region, the area will require a further major logistics hub to provide opportunities to satisfy further demand.



Whilst land is intended to be allocated in the Local Plan at South East Warrington, and Fiddlers Ferry, I consider that based on the take up of supply in Warrington, my professional opinion is that this will not be sufficient to meet demand for the area and additional allocations in the Local Plan will be required in order to ensure demand can be met. The site at Junction 21 will support meeting that demand for the reasons outlined above.

Yours sincerely



Jonathan Atherton BSc MRICS
Director

Appendix 5 – Inspectors’ Report for Appeal Reference APP/H4315/V/20/3265899



Report to the Secretary of State for Housing, Communities and Local Government

by Mike Worden BA (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Date 15 July 2021

The Town and Country Planning Act 1990 (as amended)

Application by

Omega St Helens Ltd and TJ Morris Ltd

Made to

St Helens Metropolitan Council

Inquiry Held on 27, 28, 29, 30 April and 5 and 6 May 2021

Omega Zone 8, West of Omega South and South of the M62, St Helens, Merseyside

File Ref(s): APP/H4315/V/20/3265899

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Omega Zone 8, West of Omega South and South of the M62, St Helens, Merseyside

- The application was called in for decision by the Secretary of State by a direction, made under section 77 of the Town and Country Planning Act 1990, on 18 December 2020.
- The application is made by Omega St Helens Ltd and TJ Morris Ltd to St Helens Metropolitan Council
- The application Ref P/2020/0061/HYBR is dated 21 January 2020.
- The development proposed is 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 (detailed matters of appearance, landscaping, layout and scale are reserved for subsequent approval).
- The reason given for making the direction was that, having regard to policy relating to the power to call-in planning applications, the Secretary of State concluded on the facts of this case that it was appropriate to do so.
- On the information available at the time of making the direction, the following were the matters on which the Secretary of State particularly wished to be informed for the purpose of his consideration of the application:
 - a) The extent to which the proposed development is consistent with Government policies for protecting Green Belt land (NPPF Chapter 13)
 - b) The extent to which the proposed development is consistent with Government policies for building a strong, competitive economy (NPPF Chapter 6)
 - c) The extent to which the proposed development is consistent with the development plan for the area including any emerging plan: and,
 - d) Any other matters which the Inspector considers relevant.

Summary of Recommendation:

That planning permission for the development is granted subject to the conditions outlined and with the benefit of the obligations in the section 106 agreement

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Background and Procedural Matters

- 1.1 A case management conference was held on 8 March 2021¹ to discuss administrative and procedural matters. In addition to the three main considerations set out by the Secretary of State on which he particularly wished to be informed about, I identified a number of other matters which I considered to be relevant. These were the effect of the proposal on: the character and appearance of the area; air quality; ecology; heritage and landscape assets; climate change; the living conditions of neighbouring residents with particular regard to noise; and the highway network and how the development could contribute to meeting sustainable transport objectives.
- 1.2 The Inquiry sat for 6 days, on 27-30 April and 5-6 May 2021. I closed the Inquiry in writing on 17 May 2021 following receipt of the executed section 106 agreement.
- 1.3 I undertook unaccompanied site visits on 19 April and 10 May 2021. The first of these visits was a detailed visit where I walked onto and around the site, walked the public right of way from Warrington Road to Hall Lane and visited various viewpoints to inspect the site and its wider surroundings. I also visited the existing Omega development, the residential area of Bembridge Close to the south, and various locations within the Bold Forest Park. I also drove along the M62 in both directions past the site.
- 1.4 The Council considered the proposal at a committee meeting on 27 October 2020. In accordance with the recommendation of its professional officers², the committee resolved³ to approve the application subject to conditions and the completion of a section 106 agreement and referral to the Secretary of State.
- 1.5 In light of its resolution to grant planning permission for the development, St Helens Council appeared at the Inquiry in support of the applicant. There were no Rule 6 parties but representatives of the Bold and Clock Face Action Group and Bold Parish Council appeared at the Inquiry.
- 1.6 The application is accompanied by an Environmental Statement⁴ (ES). I am satisfied that that the ES together with all other additional information, complies with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017).

¹ CD 36.3 Post CMC note

² CD35.1 Report to St Helens Planning Committee 27 October 2020

³ CD 35.2 Minutes of St Helens Planning Committee 27 October 2020

⁴ CD 33.146

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- 1.7 The application is accompanied by a Habitats Regulation Assessment: Stage One Likely Significant Effects⁵. It identifies that no likely significant effects of the proposals on the conservation objectives of the Mersey Estuary Special Protection Area (SPA) or any other European Site are envisaged. It concludes that the Habitats Regulations Assessment (HRA) process does not therefore have to progress to stage two and that an Appropriate Assessment is not required in this case. This has been accepted by the Council and I am satisfied that the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) are met.
- 1.8 Three Statements of Common Ground (SoCG) were provided to the Inquiry. These covered Planning⁶, Transport⁷ and Need⁸. A number of topic papers were produced by St Helens Council which were aimed at assisting the Inquiry primarily in respect of the other considerations which I identified that the Secretary of State should be informed about.
- 1.9 Warrington Borough Council considered the proposal at its development management committee⁹ on 5 August 2020. It also submitted a position statement¹⁰ and some of its officers took part in the round table session on the section 106 agreement.
- 1.10 A draft planning obligation was submitted at the outset of the Inquiry. A further draft was submitted during the Inquiry and a final executed agreement was submitted shortly after the end of the oral sessions. Thereafter the Inquiry closed in writing.
- 1.11 The final executed agreement under section 106 of the Act (the s106 agreement) was made between the applicants, the land owners, St Helens Council and Warrington Borough Council.
- 1.12 The Inquiry Library of Core Documents was held online prior to and during the course of the Inquiry. All documents referred to in my report can be found in the library. This can be accessed via:
<https://www.omegawestdocuments.com/>

The Site and Surroundings

- 2.1 The application site consists of around 75 hectares of predominantly arable farmland. It lies to the south of the M62 between junctions 7 and 8, and immediately west of the existing Omega development. To the south and west

⁵ CD 43.43 HRA Stage 1 Final

⁶ CD 37.1

⁷ CD 37.2

⁸ CD 37.3

⁹ CD 35.5 Minutes of meeting of Warrington Borough Council development management committee 5 August 2020

¹⁰ CD 43.73

of the site is farmland. Further to the south across fields, is the Mersey Valley Golf Course and the residential area of Lingley Green.

- 2.2 Booths Wood, an established woodland and a local wildlife site lies immediately to the south west of the application site whilst there are also other woodlands on an around the southern fringes of the site. There are also smaller pockets of woodland on the application site, linked by hedgerows along with ditches and small ponds. There is a tall hedgerow which runs along much of the eastern boundary of the site. The northern boundary with the M62 is a post and rail fence and there are also some trees along the motorway verge.
- 2.3 The application site is fairly flat. A public right of way runs from Warrington Road in the south and crosses the north western corner of the site, before crossing a footbridge over the M62 and linking to Hall Lane. Another bridge across the M62 provides private access to the site from the north side of the motorway for farm vehicles.
- 2.4 The existing Omega site straddles the M62. On the north side there are a number of commercial units. The development on the south side is much more extensive and is a substantially complete strategic employment site within the administrative boundary of Warrington Borough Council. The access to the proposed development is through the existing Omega south site.

The Proposal

- 3.1 The proposed development is summarised in the Planning Statement update¹¹, the Design and Access Statement¹² and the Statement of Common Ground on Planning¹³.
- 3.2 The proposed development is the subject of a single hybrid planning application which seeks:
- Detailed planning permission for the erection of a B8 use class logistics building referred to as Unit 1. This would have a total floorspace of 81,570 sqm comprising a 77,084 sqm warehouse with an ancillary office development. The warehouse building would include a high bay area at its eastern end with a maximum height to ridge of around 41m.
 - Outline planning permission for a combination of B2 manufacturing and B8 logistics capable of accommodating up to 123,930 sqm of development. This will comprise an expansion area next to Unit 1 and three separate units to the south of the application site. All matters are reserved for subsequent approval, with the exception of access. Access to

¹¹ CD 33.36

¹² CD 33.35

¹³ CD 37.1

the whole site would be taken off Catalina Way which serves the existing Omega development to the east.

- 3.3 The north western tip of the application site would be retained as a green area and would be planted. This green triangle would also incorporate new pond creation and recreational open space. A new cycleway and footpath would run east west through the site and link with the existing public footpath and footbridge over the M62.

Planning Policy

- 4.1 The development plan for the purposes of section 38 (6) of the Planning and Compulsory Purchase Act 2004, includes the St Helens Core Strategy¹⁴ (CS) which was adopted in 2012, the saved St Helens Unitary Development Plan¹⁵ (UDP) adopted in 1998, and the Bold Forest Park Area Action Plan¹⁶ (BFPAAP) adopted in 2017.
- 4.2 The most relevant policies within the development plan are:
- Policy CSS1 of the CS which sets out the overall spatial strategy for St Helens. This includes an overarching objective of distributing development across the borough and supporting regeneration activity.
 - Policy CE1 of the CS which seeks to ensure that sufficient land and premises **are provided to strengthen and diversify the Borough's** economic base and support economic regeneration. Amongst other things it seeks to identify a minimum of 37 ha of employment land to 2027.
 - Policy CAS5 of the CS which is concerned with Rural St Helens, in which the application site lies. It states that outside of existing rural settlements, development will comply with Green Belt policy.
 - Policy CQL2 of the CS which seeks to protect and enhance the multi-purpose value of trees, woodlands and hedgerows.
 - Policy CQL3 of the CS which seeks to protect and manage species and habitats.
 - Policy CQL4 of the CS which is concerned with the protection, conservation, preservation and enhancement of the historic built environment of the borough.
 - Policy CIN1 of the CS which sets out how infrastructure to meet St Helens needs will be provided including steering development to locations already well served by infrastructure.

¹⁴ CD 2.1

¹⁵ CD 2.2

¹⁶ CD 43.1

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- Policy CP1 of the CS which requires all development to meet defined quality standards.
 - Policy CP2 of the CS which requires all development proposals to meet certain criteria in order to help create an accessible St Helens, including locating development where the site can be served by public transport and facilities.
 - Policy S1 of the UDP sets out an approach for the Green Belt and states that the Green Belt boundary for the Borough is defined on the Proposals Map.
 - Policies GB1 and GB2 of the UDP sets out general criteria for development in the Green Belt including new buildings.
 - Policy BFP1 of the BFPAAP which sets out the strategic development approach for the creation of a sustainable forest park. Amongst other things the policy seeks to ensure that the Bold Forest Park contributes to **meeting the Borough's needs for housing, employment, open space, sport** and recreation. The justification to the policy recognises that a Green Belt review is being undertaken and that the Forest Park could have a role to play in helping to meet the objectively assessed housing and employment needs of the Borough.
 - Policy BFP ENV1 seeks to enhance landscape character in the Forest Park including increasing rates of tree cover to up to 30% of the park area.
 - Policy BFP ENV3 seeks to protect the heritage assets of the Bold Forest Park
 - Policy BFP ECON 1 supports proposals which can contribute to the Forest Park economy or enhance economic opportunities in the area where it can be demonstrated that they deliver Forest Park objectives and comply with national and local planning policies including Green Belt.
- 4.3. Emerging policy appears in the form of the draft St Helens Local Plan (SHLP) . This plan was submitted for examination in October 2020. Policy LPA04 sets out the approach to developing a strong and stable economy including the delivery of a minimum of 215 hectares of employment land 2018-2035. Policy LPA04.1 proposes to allocate part of the application site, around 31 ha, for employment development for B2 and B8 uses. At the Inquiry the Council stated that this was to meet the employment land needs of Warrington. That proposed allocation is referred to as Site 1EA, Omega South Western Extension, Land north of Finches Plantation, Bold. The policy also sets out a list of requirements for supporting documents for any application within the allocated sites.
- 4.4. The Warrington Local Plan Core Strategy (WLPCS) was adopted by Warrington Borough Council in 2014. Policy CS8 of the WLPCS identifies the now existing Omega site as a strategic proposal which can contribute to the employment land needs of Warrington and the wider sub region.

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- 4.5. Relevant national policy is to be found in the National Planning Policy Framework (the Framework) with supporting guidance in national Planning Policy Guidance (PPG).

Matters Agreed Between the Council and the Applicant

- 5.1 Three SoCG were agreed between the Council and the Applicant and these are referenced in paragraph 1.7 above.
- 5.2. Both parties agree that there is a significant need for new employment land in St Helens, of which the need for large scale logistics/industrial development is a major component. It is also agreed that need for additional employment land arises from Warrington too. It is agreed that the application site is well placed to meet this need having regard to the form of the development proposed and the locational characteristics of the site.
- 5.3. The main parties agree on the evidence base relating to deprivation and in particular to the Index of Multiple Deprivation scores and trends for St Helens.
- 5.4. The Need SoCG sets out the main parties agreed position on employment need. They both consider the 37 ha employment land requirement set out in the CS to be out of date and that the evidence underpinning the SHLP indicates a residual requirement of 165ha between 2020 and 2035. They agree that that there are no sites available within the St Helens administrative area which can accommodate a unit of around 27,870 sqm.
- 5.5. The main parties agree on the evidence base supporting the Liverpool City Region (LCR) areas of search assessment. They also agree that that the proposed allocation on the site in the SHLP cannot provide for LCR needs as it **is proposed to meet Warrington's employment land needs. They agree on the build out rates at Omega north and south over the last 10 years.**
- 5.6. Both the Council and the applicant agree that land needs to be released from the Green Belt to meet the SHLP requirement, especially in the case of large scale logistics development. They both agree that there are no suitable and viable alternative sites outside of the Green Belt which can accommodate the proposed development.
- 5.7. A Transport SoCG has been prepared. The parties agree the Transport Assessment, that access can be taken from Catalina Way and that it is appropriate for derived demand. They agree the number 52 bus service can be diverted into the site and have agreed the costs of this provision.
- 5.8. Both parties agree that the proposed development is inappropriate development in the Green Belt, and that substantial weight should be given to the harm by reason of inappropriateness in accordance with paragraph 144 of the Framework. They agree that the proposal would have a significant impact on the openness of the Green Belt although its impact is mitigated by

factors such as the existence of the existing Omega development, structural landscaping and controls over design and activity.

- 5.9. The Council and the applicant agree that there would be harm to, and conflict with the Green Belt purposes of checking the sprawl of a large built up area and safeguarding the countryside from encroachment.
- 5.10. The **Council's position, as given by its planning witness, on the purpose of preventing neighbouring towns from merging** is that there would be slight harm as the proposal would compromise the degree of separation between the western part of the Warrington built up area and the southern part of the St Helens to a small extent. The applicant considers that there would no harm or conflict in respect of this purpose.
- 5.11. Both parties agree that there would be no harm or conflict with the purpose of protecting the character of historic towns or to the purpose of assisting with urban regeneration although there is a very slight difference on the **relationship of the proposal and this purpose between the Council's planning witness and the officer's report to Planning Committee**.
- 5.12. The parties agree that there is a degree of other harm on some matters which needs to be considered alongside Green Belt harm. In most cases the main parties agree that this harm is negligible and that proposed mitigations need to be taken into account in the overall planning balance.
- 5.13. There is agreement in respect of the economic and social benefits which would arise out of the proposed development. Job numbers in respect of the Unit 1 development are agreed between the Council and the applicant.
- 5.14. Both the Council and the applicant agree that very special circumstances exist, so as to justify the grant of planning permission.

The Case for the Applicant

- 6.1 **This summary contains all of the material points in relation to the applicant's case and is substantially based upon the closing submissions of the applicant.** It is also taken from the evidence given on behalf of the applicant and from other documents submitted to the Inquiry. The Secretary of State is also **referred to the applicant's closing submissions¹⁷ which contain a full exposition of the applicant's case.**
- 6.2 The proposal aligns squarely with the socio-economic objectives of the CS which are continued into the SHLP. To date, St Helens has not been able to deliver upon that regeneration imperative to its most deprived residents the opportunities they deserve. This proposal will provide those opportunities. It will provide a range of jobs in the TJ Morris element, a range of new jobs in the outline element and importantly through the provision of new bus links will open up the entirety of the Omega development to those in most need of

¹⁷ 44.14 (ID14)

employment opportunities. The immediate deliverability of the scheme is not in doubt.

- 6.3 The proposal represents an opportunity to build upon the success of Omega and build upon the particular locational advantages of St Helens for logistics development. The proposal accords with paragraphs 80 and 82 of the Framework and critically it is exactly the type of economic development which **is the focus of the Government's 'levelling up' agenda. It provides a rare chance to deliver real, tangible opportunities for those in most need who have been 'left behind'.**

The site and background

- 6.4 RAF Burtonwood closed in 1991 and its redevelopment was originally envisaged as a strategic office park. A new junction to the M62 was created, but before development commenced it was planned to reduce the office (B1) element and introduce B2/B8 manufacturing and distribution uses, given market changes away from out of town office parks. Omega Warrington **Limited is Home England's development partner and it was acquired by M2 Limited.** The applicant, Omega St Helens Limited is a subsidiary of M2 Group.
- 6.5 Since 2012/13 over 5.2 million sq feet of logistics/manufacturing space has been delivered at Omega and occupied by national businesses such as Royal Mail, ASDA, Travis Perkins and The Hut Group. Omega is now established as a leading regional strategic logistics and manufacturing location. It has now however reached its full development potential in terms of B2/B8 uses. Its final phase is under construction and so the applicant engaged in the emerging SHLP to promote land for the westward expansion of Omega.
- 6.6 TJ Morris Ltd (TJM) were looking for a location within Omega but were unable to find a site given a number of factors such as scale; the need for cross-docking within its unit and conflict with the acoustic conditions of the consents recognising the proximity of residential properties adjacent to Omega East.
- 6.7 TJM is one of the UKs fastest growing discount retailers and one of the largest privately held companies in the UK. From a single shop in 1976 in Liverpool, the company now employs over 25,000 people and is the largest private sector employer on Merseyside. Its primary business focus is the delivery of household items to consumers through its network of stores. Its planned growth is to expand the store network. It plans to expand from its 545 stores to 800 within the next five years and 1200 in the next ten years. Such expansion requires support functions in terms of warehousing, delivery, etc.
- 6.8 TJM has two delivery centres. One in Liverpool (Axis) serving the northern half the country and one in Salisbury (Solstice), serving the southern half. Axis houses the TJM headquarters and opened in 2005. Solstice is more recent and been operation since 2013.
- 6.9 The proposed development would incorporate a £150 million automation system, the first of its kind in the UK. It would benefit from a location close to

TJM headquarters in Liverpool for managerial and technical support. It would relieve pressure on the distribution centre at Axis. TJMs locational requirements include the need to incorporate high bay facilities within an internal height of 38m to enable high technology stock holding, available power, service yard space, parking and accommodation for back office staff.

- 6.10 TJM have undertaken a site search for a third distribution centre across the whole of the M62 corridor from Liverpool to Hull. TJM have acquired a site for a fourth distribution centre, in Doncaster, but this is to enable the expansion of the store network in the future to 1200. The Doncaster site is not an alternative to the application site as was made clear by Mr Clarke in his evidence to the Inquiry. The application site is required now, to deliver the third distribution centre to enable the company to expand to 800 stores. The early acquisition of land at Doncaster is a recognition by the company that supply is very tight and learning lessons from the experience of trying to secure the site for the third distribution centre. Doncaster is necessary to enable expansion from 800 stores to 1200 stores in the longer term.
- 6.11 **TJM's site search concluded that only Omega West can meet the minimum site operational requirements in the required timeframe. There is no alternative configuration of Unit 1 which would meet the minimum operating requirements. TJM's anticipated investment in the proposed development would total around £300 million, all met from capital reserves demonstrating the company's commitment to the local economy and the region.**
- 6.12 The new distribution centre would create around 1,207 FTE jobs directly which translates to around total annual salaries of around £19 million at opening and around £38 million at full operational capacity. Job opportunities will also provide flexible working and training.
- 6.13 **The proposal is 'oven ready'. The M2 group has contractual control of the site,** TJM are under contract for Unit 1 subject to planning consent¹⁸, access is available, off site highway works are complete or underway, the power lines are being diverted, utility services are available and all other statutory consents have been obtained.

Deprivation in St Helens

- 6.14 St Helens is one of the most deprived places in the country. By reference to **the Government's Indices of Multiple Deprivation (IMD), large parts of the borough are in the top 5% and 10% of the most deprived areas.** St Helens was ranked 51st worst authority area in 2010, 36th in 2015 and 26th in 2019. This is a clear picture of a disturbingly worsening trend.
- 6.15 Twenty nine Lower Super Output Areas (LSOA) in St Helens are within the 10% most deprived nationally. 50 are within the most deprived 20% nationally. 6 are within the most deprived 1% nationally. The Lower Super

¹⁸ CD 44.8 Inquiry Document 8

Output Area in which the application site falls lies within the 20% most deprived nationally and the surrounding ones are within the most deprived 10%.

- 6.16 A more detailed look at the specific domains, the types of deprivation, indicates that St Helens is the 9th worst most deprived local authority in the country in respect of the employment domain. It is 8th worst in respect of health and 36th worst in respect of income.
- 6.17 **Nearly one quarter of the St Helen's population live in the most** deprived neighbourhoods. This is 42,877 people, a figure which has increased by 26% since 2010.
- 6.18 There is a hugely significant skills gap in St Helens with 40% of economically active residents having **no qualifications. 25% of St Helen's unemployed** people have no qualifications.
- 6.19 The number of jobs in St Helens is broadly the same as it was in 1984, yet in neighbouring Warrington, the number of jobs has doubled in the same time. Job density increased in Warrington from 0.95 in 2001 to 1.18 now. In **St Helen's** job density in the same period has remained unchanged. Future job growth in St Helens is dependent upon strategic sites such as Omega West.
- 6.20 Given the above, it is not surprising that St Helens is in the highest priority group of local authorities for the new Levelling Up Fund. It is one of 101 locations successful in bidding for the Towns Fund and is a constituent part of the successful Liverpool Freeport Bid. There is a fundamental need for urgent economic investment in St Helens.
- 6.21 In Warrington the delivery of large floorplate B2/B8 accommodation stands in stark contrast to St Helens. For the period 2009/10 -2018/19 the take up in Warrington stood at 195ha but in St Helens it was just 17ha.
- 6.22 **There is no reason why that story can't be changed. St Helens** benefits from all of the advantages that Warrington has such as immediate access to communications infrastructure including the motorway network, a large labour base and pent up demand for employment space.

Green Belt

- 6.23 The proposed development lies entirely in the Green Belt. St Helens is particularly constrained with some 65% of the Borough designated as Green Belt, the highest of any of the Merseyside districts. The Green Belt boundaries have remained unaltered since 1983.
- 6.24 The proposal is inappropriate development within the Green Belt. Paragraph 144 of the Framework requires that substantial weight should be given to any harm to the Green Belt. The proposal will have a significant impact on the openness of the Green Belt although that impact is ameliorated to an extent by the proposed structural landscaping and the site context adjacent to Omega and the M62.

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- 6.25 The St Helens Green Belt Review (GBR) records that the CS did not need to release Green Belt land but that circumstances have changed markedly since the CS was adopted. It notes that a slow take up of employment land in St Helens has been due to restrictions on the availability of suitable sites rather than a lack of market demand and this is supported by the success of Omega.
- 6.26 The GBR sub-divided and assessed Green Belt parcels. The application site lies within parcel _076 which is large and extends to around 570ha. The site overlaps two sub parcels, a and b. It is likely that this division was arrived at as a result of the extent of the Homes England land ownership which is consistent with area c of the parcel _076. That area is considered in the review, to have a medium contribution to the purposes of the Green Belt. The review has informed the proposed allocation of that area for employment in the SHLP. A different division of the parcels could have come to similar conclusions about the whole of the application site rather than considering as part of the much wider area of Green Belt to the west.
- 6.27 The proposed development would be a significant change in both visual and spatial terms from the existing undeveloped nature of the site in respect of openness. However, it must be considered in its locational context of the dominant edge of Omega and the M62. The loss of openness will be permanent and the degree of activity significant. Landscaping will help provide mitigation but also the buildings would be seen within the context of the existing Omega development. While harm to openness would be significant, the entirety of the site represents less than 1% of the St Helens Green Belt.
- 6.28 Of the five purposes of the Green Belt, the proposal does not conflict with three. This leaves checking the sprawl of a large built up area, and to assist in safeguarding the countryside from encroachment.
- 6.29 In respect of the first of these two, the site is well contained to the north by the M62 and to the east by Omega. To the west the proposed green triangle would provide mitigation and the site is well contained and capable of providing a strong defensible boundary to the Green Belt. The edge of the Omega site would be replaced by a carefully constructed landscaped western boundary. A finer grained approach than the GBR would lead to a moderate impact on the Green Belt in respect of this purpose.
- 6.30 In terms of the second of those two purposes, the proposed development would encroach into the countryside and the impact is moderate to major. However, the proposal would be appreciated in the context of the existing Omega site and design and landscaping will help to break up the massing of the TJM building.

Building a strong and competitive economy

- 6.31 The proposed development would: provide a very substantial number of jobs across a range of disciplines; meet the urgent need of a highly successful business to continue its journey of organic growth; support and contribute **towards St Helen's Council's** regeneration imperative to provide jobs and

deliver socio economic improvements to one of the most deprived communities in the country and assist in meeting the urgent and specific needs for modern, high quality logistics and industrial accommodation.

- 6.32 The proposal fits hand in glove with the **Government's levelling up agenda** and indeed is exactly the type of development envisaged as part of it. St Helens is in the highest priority group for the new Levelling Up Fund. It is supported by local partners and decision makers. It will deliver around 3,886 jobs in total when fully operational. Furthermore, provisions within the planning obligation will direct job opportunities to those most in need and that training opportunities as part of the TJM programme will enable the development of skills and career progression.
- 6.33 The Objectively Assessed Need (OAN) for employment land in St Helens is identified as around 219.5 ha for the period 2015-2035 which equates to a net residual requirement of around 165ha 2020-2035. Through the process of developing the SHLP the Council has identified a requirement to allocate 265ha to employment land of which around 31.2 ha will be to meet **Warrington's needs. Of the** residual amount of 234 ha, around 52ha has already been delivered and some 43ha is expected to be delivered after the end of the plan period.
- 6.34 Of the SHLP proposed allocation of 265ha some 251 ha of it is also identified by the Liverpool City Region (LCR) to meet regional need. The LCR employment land assessments (LCR SHELMA) identify a need for specialist employment uses including port related storage and additional B2 and B8 land. Furthermore, the successful bid by LCR for Freeport status is likely to add to the identified need for employment land in the LCR.
- 6.35 The critical conclusion is that the need for employment land identified in LCR is likely to be higher than that currently planned and that St Helens may need to take a share of additional growth. Likewise the need identified in the SHLP can only be considered as a minimum baseline which in reality is considerably higher.
- 6.36 Market demand for grade A industrial and logistics premises in 2020/21 has been strong nationally and regionally. The present supply of grade 1 space in the North West is 13 buildings of which six are complete, six under construction and one available. Six of these are under offer yet there are 27 identified requirements. Across the North West there are 15 sites with planning permission or a development plan allocation capable of accommodating a unit of 27,280 sqm but all are unsuitable for the proposed development in terms of location, deliverability and timescale.
- 6.37 The need for the TJM development is immediate and for the outline element time is pressing given the short-term supply position. The second proposed unit within the outline already has board approved heads of terms with a major national employer. Employment land supply in St Helens is, and will be for a considerable period of time, tightly constrained. St Helens cannot begin to level up without suitable job opportunities. In the longer-term Parkside

West and East may comprise a substantial portion of anticipated supply but the former will not be complete until 2035 and the latter not operational until 2030 and complete until 2045. The shortfall of new jobs in St Helens is staggering and will have real world negative consequences. St Helens and the LCR will continue to fall behind. Regeneration is top priority for the St Helens Council as Councillor Richard McCauley, **St Helens Council's** Cabinet Member for Planning and Regeneration makes clear in his evidence.

- 6.38 Paragraph 80 of the National Planning Policy Framework (the Framework) is almost written for this proposal. It is totally aligned. The proposal will allow for TJM and others to invest, expand and adapt. It will drive economic growth and productivity and it builds on the strength of locational advantages. It counters the identified weaknesses in the local area and it addresses the challenges of the future through the provision of efficient and modern development using next generation technology.
- 6.39 The proposal also accords with Paragraph 83 of the Framework. It builds on the success of Omega and in a suitably accessible location provides storage and distribution operations at a scale to meet requirements of TJM and others. It also accords with PPG on Housing and Economic Development Needs Assessments which is very clear on the supply of land for logistics. Not approving the scheme would be inconsistent with the Framework and the PPG.

The Development Plan

- 6.40 The adopted development plan comprises: The St Helens Local Plan Core Strategy (CS); the St Helens Unitary Development Plan (UDP); the joint Merseyside and Halton Waste Local Plan and the Bold Forest Area Action Plan (AAP). The St Helens Local Plan (SHLP) was submitted for examination on 20 October 2020 with examination hearings commencing on 25 May 2021. The proposal is consistent with the Warrington Core Strategy (WLPCS) which is a material consideration.
- 6.41 The CS has a focus on regeneration, sustainable growth, reducing deprivation and prioritising the development of derelict and vacant sites. Policy CSS.1 of the CS sets out the overall spatial strategy which states amongst other things that development in the Green Belt (outside the Parkside area) would be restricted to existing settlement boundaries outside of which development will comply with Green Belt policy. The CS identifies a minimum employment land need of 37ha to 2027.
- 6.42 This is now out of date and is in sharp contrast to the SHLP which takes a more strategic approach and seeks to allocate more than six times this amount based upon review of employment land evidence post adoption of the CS. This was one of the factors which led the Council to prepare a new local plan. The evidence base for the SHLP is highly relevant to the case for the current proposal. The SHLP is a step change. It seeks to deliver a minimum of 215 ha of employment land which will help the LCR need for economic

growth, job creation and skills development and maximise the opportunities presented by St Helens location.

- 6.43 The TJM requirement was not known at the time of identifying the need for employment land. It is additional to the proposed allocation of part of the site in the SHLP for **employment to meet Warrington's employment land needs**. However, the proposal is of the type envisaged by the SHLP in the location envisaged and served by transport links to deprived areas.
- 6.44 The proposal lies within the Bold Forest. The AAP recognises that the Forest Park has a role to play in helping to meet objectively assessed housing and employment needs of the borough.
- 6.45 The proposal accords with the vast majority of the relevant policies of the statutory development plan although there are some minor areas of conflict. When assessed against the plan as a whole and given that very special circumstances exist, the proposal accords with the development plan.

Other considerations

- 6.46 One of the main points made by objectors was cynicism as to the number of jobs that the proposal would deliver. The only evidence before the inquiry however is that of the applicants and this evidence is very robust. TJM have working knowledge of two distribution centres and figures are supported by the HCA employment density guide. These will not be just low skilled jobs but a wide range of which a proportion will be very highly skilled. TJM provide ongoing training and career progression opportunities and the public transport fund will ensure that there will be transport links to the most deprived areas of St Helens. Automation technology does not equate to fewer jobs. The jobs are real and will deliver a step change in the livelihoods of local residents.
- 6.47 Representations that alternative sites exist are misplaced as is the view that existing B2/B8 accommodation is only half full. These are not borne out by the market or by looking at Omega.
- 6.48 The effect of Omega built form reduces the magnitude of change to the character and appearance of the area which would result from the proposal. This is supported by landscape evidence. The proposal must be seen in the context of Omega. The SHLP allocation would extend the built form of Omega westwards in any case. From the M62 the application site is seen in the context of Omega. The landscape strategy will not obscure the new buildings but will obscure the service yards. The experience for Bold Forest Park users will be enhanced given that the site is currently inaccessible and a featureless arable field.
- 6.49 No Air Quality Management Areas cover the site, but one bounds the north eastern corner along the M62. The air quality objectives are met and the likely adverse impact on air quality as a consequence of the permanent operation of the proposal will be negligible and the effect insignificant. Such harm should be given very limited weight.

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- 6.50 The site has been subject to thorough and accurate surveys in terms of protected species and the quality of existing habitats, as agreed by the Merseyside Environmental Advisory Service. The impact of the proposal has been rigorously assessed and these impacts are entirely addressed through both on and off- site mitigation secured by planning conditions and obligations. Evidence indicates this would be a net benefit in bio-diversity terms. The proposal complies with all development plan policies in respect of ecology.
- 6.51 There will be impacts on designated heritage assets but only low level of harm to their significance and which is slight within the spectrum of less than substantial harm. There is no evidence that there are any remains of a mediaeval deer park on the site.
- 6.52 There would be a minor adverse residual effect on climate as a result of negligible magnitude of change relating to embodied carbon, construction transport, operational building and operational transport. The proposal is compliant with the relevant development plan policy CP1 of the CS.
- 6.53 The evidence shows that there will be so significant adverse effects on the living conditions of neighbouring residents. The closest receptor, the nursery in Omega is relocating.
- 6.54 Vehicular access to the site will be taken off Catalina Way. The application is supported by transport assessments and mitigation required on Skyline Drive and widening of the M62 westbound off slip at j8. The Skyline Drive works are now complete and the M62 works due to be completed by Highways England by end of May 2021. Subject to conditions there are no objections to the application from highway authorities at Warrington and St Helens or from Highways England.
- 6.55 The S106 provides for significant sums to St Helens and Warrington Councils to support bus services to serve the site and which will enable the whole of the Omega site to be opened up to St Helens residents in the most deprived wards. The proposal is acceptable in highways and sustainable transport objectives.

Very Special Circumstances

- 6.56 The proposed development will result in major harm to the openness of the Green Belt. There is no conflict with three of the five purposes of the Green Belt and for those that are conflicted the impacts are only moderate.
- 6.57 The Framework requires substantial weight to be given to Green Belt harm and also harm by reason of inappropriateness must be considered along with other harm. The additional harms include air quality, heritage, landscape and character, noise and lighting.
- 6.58 Other considerations must outweigh these harms for very special circumstances to be demonstrated. In this proposal they are very significant considerations. Both the applicants and St Helens Council consider that very

special circumstances exist as the proposal and the benefits are in the best interests of Warrington and St Helens boroughs and clearly outweigh the harm likely to arise from the development.

Applicants conclusion

- 6.59 The proposal aligns with the socio-economic objectives of the CS and which are continued into the SHLP. The proposal will deliver the regeneration imperative to give the opportunities that the deprived residents deserve. The proposal will bring immediate jobs and build on success of Omega. The benefits are formidable and outweigh the harm to the Green Belt such that very special circumstances exist.
- 6.60 Permission should be granted without delay so that the benefits can be **delivered in accordance with the Government's national policies for economic growth** in those areas which have been left behind.

The case for the Council

Background

- 7.1 This summary contains all the material points in relation to **the Council's case. It is taken substantially from the Council's closing submission but also** from evidence given on behalf of the Council and from other documents submitted to the Inquiry. The Secretary of State is also referred to the **Council's closing submissions** at Inquiry Document 44.14 (ID14) which sets **out the Council's position.**
- 7.2 This is the fourth in a series of Inquiries concerning logistics and related development in St Helens. Three have been called in and one recovered. The first one concerned the construction of up to 92,000 sqm of B8 employment floorspace with ancillary B1 at the former Parkside Colliery. The second considered an application for a link road to enable phase 2 of the Parkside Scheme and a Strategic Rail Interchange. Both of these were strongly supported by St Helens Council.
- 7.3 The third concerned an appeal against non-determination for 167,225 sqm of B2/B8 floorspace at Haydock Point. The Council resolved that it would have refused planning permission.
- 7.4 It follows that the Secretary of State has already heard a great deal of evidence which is relevant to the issues for determination in this appeal, in particular in relation to the need for road based logistics and the economic and regeneration benefits which the proposal could bring.
- 7.5 The application site lies in St Helens but adjoins the Omega employment area **in Warrington Borough Council's area. The St Helens statutory development plan applies but Warrington's development plan is a material consideration of significant weight. Both Council's support the grant of consent, subject to conditions and the section 106 agreement.** The most important policies for determining the application are not out of date, with the exception of the

37ha employment land requirement. The CS post-dates the Framework and is consistent with it.

- 7.6 Regeneration is the heart of the CS. St Helens has a legacy of derelict land affected by contamination, poor health, high unemployment rates and low educational attainment. It has suffered from years of population decline (1988-2001). It has a legacy of poor health.
- 7.7 St Helens has levels of multiple deprivation amongst the highest in the country. Its deprivation ranking is getting progressively worse and has gone from the 51st most deprived local authority area in the country in 2010 to the **26th in 2019. 50 of the borough's neighbourhoods are in the 20% most** deprived nationally. It is the 8th most deprived place for health in the country, 9th for employment and 36th for income. The application site lies in a lower super output area (LSOA) which is within the 20% most deprived areas nationally.
- 7.8 These figures are grim reading and it is unanswerable that deprivation has materially worsened since the adoption of the CS in 2012 and the imperative for regeneration has increased.

The Spatial Strategy

- 7.9 Policy CSS1 of the CS sets out the overall spatial strategy. The main focus for economic development is previously developed land within the M62 Link Road Corridor and the Haydock industrial estate. The re-use of previously developed land was prioritised because of the availability of such sites in 2012. It is now agreed that there are no suitable, viable and available sites to meet the employment land requirements set out in the SHLP.
- 7.10 The CS spatial strategy seeks to maintain the Green Belt in the short to medium term. Green Belt boundaries have not changed since 1983. It follows that the proposal will comply with the spatial strategy if it meets the Green Belt tests.

Economic Growth

- 7.11 Within the CS, strategic objective 5.1 seeks to provide for local employment needs and this term is wide enough to include the need for Omega to expand into St Helens.
- 7.12 The Framework sets out national policy and its economic objective is to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity. The Framework also requires planning decisions to create the conditions in which businesses can invest, expand and adapt and this means ensuring sufficient supply of land and range of sites. Areas need to build on their strengths and counter weaknesses, addressing challenges of the future.
- 7.13 St Helens strengths are no longer coal, glass and heavy engineering. Its economic strengths now lie in its location, its proximity to regional ports and

airports and its access to transport connections. Its strength is now as a base for logistics. Its weaknesses are its deprivation, the poor skill levels of its residents, its loss of manufacturing and the lack of readily available developable sites at the largest scale. The Framework requires that significant weight should be placed upon the need to support economic growth.

- 7.14 The PPG Housing and Economic Development Needs Assessments considers that logistics plays a critical role in enabling the effective supply of goods and services to customers and that logistics development has specific locational requirements.

Location

- 7.15 The application site is in an attractive location for logistics development, adjacent to one of the prime logistics locations in the North West. Over the last 10 years 5.2M sq ft of manufacturing and logistics floorspace has been delivered at Omega and it is an undoubted success with over almost 10,000 new jobs created. Omega though is now at capacity and constrained to the south, east and north, it can only logically expand westwards. It has the necessary infrastructure to do so and access to the M62 easily gained through an existing road.
- 7.16 The proposal is deliverable and will be very attractive to the market.

Employment Land Requirement

- 7.17 The Framework requires sufficient provision to be made for employment land and infrastructure for transport looking over 15 years. Policies should therefore assess and plan to meet the OAN for employment land in accordance with a clear economic vision and strategy which encourages economic growth.
- 7.18 All parties agree that that CS Policy CE1 (Part 1), the requirement to deliver 37ha by 2027, is out of date. No material weight should be attached to it. The SHLP was submitted for examination in October 2020 and whilst limited weight only can be attached to the policy, the evidence base behind it should be afforded significant weight. The Council is planning for a minimum of 219 ha of land for employment 2018-2035 in the SHLP.
- 7.19 Sufficient land has been identified to deliver 265 ha to 2035. 31 ha of the 265 ha is on part of the application site and is to meet the needs of Warrington. St Helens Council considers that there is a specific need for employment land to meet the particular requirements of TJM and a general need for employment land to meet market needs to 2035 to which significant weight should attach.

Warrington Core Strategy

- 7.20 The WLPCS is a material consideration of significant weight. It post dates the Framework and runs to 2027. The WLPCS highlights the excellence of **Warrington's strategic connectivity**. It states that it lies at the hub of the **region's communications network**.

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- 7.21 Though not as disadvantaged as St Helens, there are significant pockets of deprivation in Warrington including areas close to the application site. The WLPCS seeks to deliver around 277 ha of employment land 2006-2027, primarily reliant on Omega. However Omega is now at capacity and it is vital that further land is made available to 2027 and beyond.
- 7.22 Whilst work on the replacement Core Strategy for Warrington has been paused its evidence base should be given significant weight. Warrington BC will have to release very significant amounts of green belt land to meet the minimum requirement for employment land in the next Plan period. This would be at least 215 ha and consistent with the extant and emerging plans in Warrington releases should take place at Omega given its success as strategic location and existing infrastructure.
- 7.23 It follows that land should be released in St Helens to meet employment land need in Warrington and this is a matter of agreement between the two Councils. This is a significant need.

Economic Benefits

- 7.24 Paragraphs 80-82 of the Framework place significant weight on the need to support economic growth and productivity taking into account local business needs.
- 7.25 There are key economic benefits of the proposal. These include: 849 gross on site construction jobs; 980 gross FTE operational jobs on site for the full application; 2,679 gross FTE jobs for the outline application; net employment around 1,103 FTE jobs for the full application and 3,104 FTE jobs for the outline; and which would result in around £188M GVA to the regional economy of which £141M GVA would be in St Helens. Warrington has grown its employment from 119,000 in 2001 to 154,000 now whereas St Helens has reduced employment from 70,000 to 69,000 in the same period.
- 7.26 The local planning authority considers that significant weight should attach to this level of job creation and benefits and that the application complies with the objectives of the development plan to secure multiple deprivation by providing economic opportunities to areas in need.

Local character and distinctiveness

- 7.27 Policies in the CS seek to protect and enhance landscape character in the rural areas. The CS explains that rural St Helens coincides with the Green Belt, where the Green Belt policy will apply and **'any development will be informed by the Landscape Character Assessment'**. The landscape character assessment of 2006 is out of date in respect of this site as the whole of Omega has been developed since then. It is of limited relevance to the determination of this application. The site now forms the only natural and logical extension to Omega and therefore this a key point of distinction to the Haydock Point proposal.

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- 7.28 Nevertheless there is conflict with some policies of the CS and notwithstanding the location of the full application building next to the M62 and the existing Omega development, the Council accepts that the proposals will not preserve or enhance the character of the landscape. Significant weight should be attached to the conflict with the CS policies in this regard and this must be weighed in the Green Belt policy balance.
- 7.29 In weighing up the balance it must be recognised that the need for logistics development cannot be met within the existing settlement boundaries. Such development must inevitably take place on greenfield Green Belt sites. Given the footprint and nature of logistics proposals there will be a significant impact on landscape character wherever they are placed in St Helens. It is the logical extension of the existing and successful employment site and such factors must temper the weight to be attached to the conflict with the development plan in the planning balance.

Bold Forest Park Area Action Plan (AAP)

- 7.30 The AAP was adopted in 2017 and forms part of the development plan. It stresses that the development plan should be applied as a whole. There is conflict with policies BFP1 and BFP SN1 of the AAP because the proposal does not enhance landscape character. However, the AAP recognises that the Bold Forest Park is a managed and engineered landscape.
- 7.31 The reasoned justification to Policy BFP1 of the APP recognises that the Bold Forest Park could have a role to play in meeting OAN for employment. It follows that limited weight should be afforded to conflict with the AAP policies. The Council considers that the mitigation and enhancement secured by conditions and the Section 106 agreement will ensure that the residual impact is no more than that envisaged by the AAP in meeting the need for more employment land as an extension to Omega.

Green Belt policy

- 7.32 It is agreed that the proposal is inappropriate development in the Green Belt and that substantial weight should attach to the harm by reason of inappropriateness.
- 7.33 The Green Belt west of Omega is open and free from development. The mitigating factors such as the Omega development and the M62 do not alter the open character of the site itself. The proposal would have a significant adverse impact of the spatial and visual openness of the Green Belt. It would be permanent and generate substantial activity. However, it must be recognised that any logistics development in the Green Belt would impact on openness.
- 7.34 The proposal would lead to the expansion of the Warrington urban area into the Green Belt of St Helens, although there would be some mitigation. It would nonetheless compromise substantially the Green Belt purpose of checking unrestricted urban sprawl.

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- 7.35 The proposal would reduce the strategic gap between Halton and St Helens and between Warrington and St Helens. There would though still be clear separation and St Helens is offset from Warrington across the M62. It is the **view of the Council's planning witness that the degree of separation between** the western part of the Warrington built up area and the southern part of St Helens would be comprised to a small extent. There would therefore be slight harm to the Green Belt purpose of preventing neighbouring towns from merging.
- 7.36 The Green Belt review found that the sub area 076C had a medium role to play in safeguarding the countryside from encroachment. This was due to the presence of the large scale built development at Omega South and the M62 which results in moderate countryside character. Sub area 076B has a high role. The Council considers that the proposal would result in significant encroachment into the countryside, the scale of which is significant.
- 7.37 Whilst the Council in its committee report concluded that there was conflict with the purpose of assisting in urban regeneration because the proposal did not assist **with it, the Council's planning witness concludes that because there** are no suitable alternative sites in the urban area, the application site cannot serve this purpose.
- 7.38 Substantial weight should be attached to the harm by reason of inappropriateness, the harm to openness and harm to two of the Green Belt purposes. However it must be recognised that such harm is the inevitable impact of the requirement of national policy and guidance to meet the critical need for employment land for logistics which in **St Helen's case must take** place on previously undeveloped land outside settlement boundaries in the Green Belt.

Other harm

- 7.39 It is agreed that there are aspects of other harm and the Council recognises that there are different judgements about the level of impact and the weight to be attached to those impacts. There is however no disagreement on the planning merits.
- 7.40 Significant harm would be caused to landscape character and visual amenity. There would be a significant loss of natural habitat and whilst this is to be mitigated it would take time to mature. There would be harm to the setting of two listed buildings and the Old Moat which would need weighing against the public benefits of the proposal. This harm would be less than substantial and the harm the two listed buildings would be at the lower end of the spectrum to harm. Nevertheless, having regard to caselaw¹⁹, it be given significant weight against the proposed development.

¹⁹ CD 6.8 Barnwell Manor v East Northants 2014, CD6.9 Forge Field v Sevenoaks 2014, CD 6.5 Jones v Mordue 2015, CD 6.13 Bramshill v SSHCLG 2021

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- 7.41 There would be no harm to the amenity of local residents in respect of noise effects, subject to conditions. There would be no harm to residential amenity by virtue of overshadowing, dominance, privacy or light pollution.
- 7.42 There would be some harm to air quality but the proposal would be policy compliant and the harm should be given only limited weight against the proposed development.
- 7.43 The proposed development would add additional traffic onto local roads and any limited harm needs to be weighed against the proposal. However this needs to be considered in the light of the sites ability to access the M6 without requiring any additional road infrastructure and without having to pass through residential areas. This is a locational advantage of the proposal.

Other Considerations

- 7.44 The local planning authority firmly submit that there are other considerations which very clearly outweigh the potential harm to the Green Belt by reason of inappropriateness and other harm such that very special circumstances exist. These very special circumstances are formidable and are clearly set out in the **Council's evidence**.
- 7.45 These include the significant need to address some of the most deprived wards in the country; the need to address the employment land requirements of TJM for a northern logistics hub, the need to address OAN for more employment land next to the highly successful Omega; the lack of supply of urban sites on previously developed land, there is no alternative to Green Belt development in St Helens or Warrington, the location of the site and its attractiveness to the market; no infrastructure constraints and the social and environmental benefits.
- 7.46 The Committee on Climate Change has not suggested a moratorium on road-based logistics and neither has it been suggested by the Secretary of State. The Department for Transport recognises the benefits of international trade through shipping. The answer to meeting the challenges of climate change is not the refusal of road-based logistics which are critical to the economy and which will result in more efficient movements of freight. There is no in principle objection to the proposal on climate change grounds and that was the conclusion of the Secretary of State on the recent Eddie Stobart appeal²⁰.

Council's conclusion

- 7.47 The proposal complies with the development plan and the Framework. It is sustainable development which should be approved without delay subject to conditions and the S106 planning obligations.

²⁰ CD 3.6 SofS DL 40 and 44. MR 401/402 and AR 160-162

Other Oral Representations

Bold and Clock Face Action Group

- 8.1 A number of representatives gave statements to the Inquiry on behalf of the Bold and Clock Face Action Group (BCFAG). Chairman Mr Christopher Hughes explained that BCFAG was established in 2018 by local residents to engage with St Helens Council on local plan matters. The group is committed to ensuring a sustainable future for the area.
- 8.2. The planning representative for BCFAG, Ms Jackie Copley argued²¹ that the site has a rural, open and green character and that it is home to an abundance of wildlife. The area is used for equestrian activities too which would be restricted if the proposal was allowed.
- 8.3. Ms Copley stated that the site makes a high contribution in keeping the land open. She considered that there is conflict with all but one of the five purposes of land in the Green Belt, that one being to preserve the setting and special character of historic towns. BCFAG considers that there is cumulative Green Belt harm when developments at Florida Farm, at Omega, and major residential schemes to the south of Omega are combined.
- 8.4. Ms Copley said that BCFAG is concerned about the over dominance of the warehousing sector and that to support a robust economy a diverse mix of business is needed. It is argued that the number of jobs proposed would not be achieved in reality and that the logistics sector is based upon low skilled and low paid employment. It claims that recent warehouse and distribution developments such as Florida Farm in St Helens have achieved very low job numbers and that only 320FTE out of a promised 2,500 FTE have materialised in the Florida Farm scheme.
- 8.5. **In BCFAG's view the proposal is contrary to the development plan in particular the AAP.**
- 8.6. Other representatives from BCFAG addressed the Inquiry in relation to ecology and heritage including the medieval deer park. Representatives also highlighted the impact that the proposal would have on local residents and users of the Bold Forest Park. Mrs Elizabeth Lloyd²² was concerned about the impact that the proposal would have on the health and wellbeing of local people and visitors who all enjoy using Bold Forest Park. A local farmer, Mr Hilton, considered that the proposal would be harmful to the ecology of the local area and to Booths Wood in particular.
- 8.7. Evidence was presented about the value of the recreational aspects of the Bold Forest Park and how BCFAG considered that the proposal would harm that value. Mr Gary Conley²³, a former miner who was heavily involved in the

²¹ CD 41.8

²² CD 44.5 Inquiry Document 5

²³ CD 41.14

establishment of **the 'Dream' sculpture** at the Sutton Manor Community Woodland felt that the proposal would detract from the value and importance of the art work and the enjoyment of the Park.

Bold Parish Council

8.8 **Councillors O'Keefe and Makin** addressed the Inquiry on behalf of Bold Parish Council. They considered that the proposal would be harmful to the Bold Forest Park, contrary to the AAP and that the socio- economic benefits have been overstated. They felt that St Helens should not be focussing on logistics which they argue would not address the weaknesses of the St Helens economy. They refer to the jobs created at the Florida Farm scheme as a case in point.

Councillor McCauley

8.9 The Cabinet Member for Regeneration and Planning at St Helens Council and ward councillor for Thatto Heath addressed²⁴ the Inquiry to support the proposal. He considered that the proposal would be harmful to the Green Belt but that significant weight should be placed upon the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. He said that regeneration was the top priority for the Council and that the jobs proposed would benefit the most deprived communities of St Helens and accord with national Building Back Better and levelling up priorities as the country emerges from the pandemic.

Written Representations

- 9.1 There have been other written representations objecting to the proposal at both the planning application stage and subsequent to call in. The representations at planning application stage are summarised in the St Helens Council Planning Committee report²⁵. Those made at call in stage can be found in section 41 of the online Inquiry Library. Many of the representations make similar points to BCFAG and Bold Parish Council in objecting to the proposal.
- 9.2 The grounds include impact on the Green Belt; impact on the Bold Forest Park; loss of farmland; harmful impact on visual amenity; impact on local infrastructure in Warrington; local warehouses are empty and more are not needed; detrimental impact on the equestrian community; harmful to ecology; increase in noise pollution; and loss of woodland.
- 9.3 Objections have also been made by Rainhill Parish Council, Culcheth and Glazebury Parish Council, and Great Sankey Parish Council which collectively are mainly based on Green Belt, cumulative impact, air quality and traffic grounds.

²⁴ CD 44.4 Inquiry Document 4

²⁵ CD 35.1

Planning Conditions

- 10.1 A list of suggested agreed conditions was submitted by the main parties and was the subject of a round table session at the Inquiry. The conditions were discussed on a without prejudice basis and were considered in the light of the tests set out at paragraph 55 of the Framework and the advice in Planning Practice Guidance (PPG). There was no dissent from any interested party to the list of suggested conditions.
- 10.2 A revised list²⁶ of suggested conditions was submitted following that session at my request.
- 10.3 I shall comment on conditions later in my report.

Planning Obligations

- 11.1 The executed agreement (the S106 agreement) made in accordance with Section 106 of the Town and Country Planning Act 1990 secures financial contributions and other provisions. These relate to contributions to St Helens Council in respect of Bold Forest Park Infrastructure; Biodiversity; Public Transport; and monitoring. Contributions are to be made also to Warrington Borough Council in respect of Highways, and Travel Plan. Provision is also made for the revocation of the Omega South planning permission.
- 11.2 St Helens Council and Warrington Borough Council have both submitted a Statement of Compliance with CIL Regulations. These set out the justification for each of the relevant contributions sought in accordance with the policy tests set out in the Framework and statutory test in regulation 122 of the Community Infrastructure (CIL) Regulations 2010. I shall deal with the planning obligations in more detail later in my report.

²⁶ CD 43.71a

Inspector's Conclusions

12.1 *The numbers in [] refer back to earlier paragraphs in this report which are relevant to my conclusions.*

Main considerations

- 12.2 Taking into account those matters upon which the Secretary of State particularly wished to be informed and having regard to the evidence, the main considerations in this case are:
1. The extent to which the proposal is consistent with Government Policies for the Green Belt (NPPF Chapter 13) including whether any harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations so as to amount to the very special circumstances required to justify the proposal.
 2. The extent to which the proposal is consistent with Government Policies for building a strong and competitive economy.
 3. The effect of the proposal on: the character and appearance of the area; heritage assets; air quality; ecology; the living conditions of neighbouring residents with regard to noise and vibration; agricultural land; the transport network and climate change.
- 12.3 My report will address each of these considerations in the context of local and national policies and come to an overall conclusion on the **proposal's** consistency with the development plan.
- 12.4 Section 70(2) of the Town and Country Planning Act 1990 provides that, in dealing with the proposals for planning permission, regard must be had to the development plan so far as material to the application, and to any other material considerations. Section 38 (6) of the Planning and Compulsory **Purchase Act 2004 provides that 'If regard is had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the development plan unless material considerations dictate otherwise'.**
- 12.5 The development plan comprises the CS, the saved UDP, and the AAP. I have set this out earlier in the report. [paragraphs 4.1-4.2]. The Framework is a material consideration of significant weight. Paragraph 11 of the Framework sets out the presumption in favour of sustainable development and contains a decision-making framework in relation to development proposals.

Green Belt

- 12.6 Paragraph 143 of the Framework states that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 states that substantial weight should be given to any harm to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by

reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations.

- 12.7 Policy CSS1 of the CS sets out the Spatial Strategy for St Helens and part 1 ix states that outside of existing settlement boundaries development will comply with Green Belt Policy.
- 12.8 Policy GB1 of the saved UDP sets out general criteria for development control in the Green Belt and Policy GB2 sets out more detailed criteria. Policy S1 sets out the general approach to the Green Belt in St Helens. Although predating the Framework, the general principles in respect of inappropriate development and very special circumstances needing to exist are set out in those policies and they are broadly consistent with the Framework. Having regard to paragraph 213 of the Framework I therefore accord significant weight to these policies in the determination of this application.
- 12.9 It is not disputed that the proposed development is inappropriate development in the Green Belt [5.8] It is also not disputed that the proposed development would cause significant harm to the openness of the Green Belt [5.8]. The site is open countryside. The M62 and the presence of the existing Omega development do not alter the open character of the site itself.
- 12.10 **The applicants argue that the Council's Green Belt Review**²⁷ (GBR) has overstated the value of the full application part of the site by including it within the much wider and extensive area of countryside to the west [6.26-6.27]. Having regard to the NPPG on Green Belts²⁸, I consider that the proposed buildings would have a significant adverse impact on the spatial and visual openness of the Green Belt and its effect would be permanent and generate significant activity. I consider this to be the case irrespective of how the parcels were delineated within the GBR.
- 12.11 Paragraph 134 of the Framework sets out the five purposes which Green Belts serve. It is not disputed by any party that there would not be conflict with the purpose of preserving the setting of historic towns.
- 12.12 The application site of around 75 hectares is a significant size and the proposed development would be primarily of built and developed form. It would conflict with the purpose of assisting in safeguarding the countryside from encroachment.
- 12.13 In terms of the purpose of preventing neighbouring towns from merging, I agree with the applicant that there would still be significant separation between the towns. However, I concur with Mr Nicholls who considers that the proposal would compromise the degree of this separation between the western part of Warrington and the southern part of St Helens [7.35]. Whilst in absolute terms this is to a small extent it would as a matter of fact extend

²⁷ CD 3.5 St Helens Local Plan Green Belt Review 2016-2018

²⁸ 001 Reference ID: 64-001-20190722

the built-up area of Warrington closer to the built-up area of Clock Face in St Helens. I consider this would be harmful to this purpose. In reaching this view I take no account of the land lying in different local authority areas as I consider it is the nature and extent of the gap between the towns not where the administrative boundaries lie.

- 12.14 The final purpose is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. The proposal is not on land in this category. The Council in its Committee report concluded that there would be conflict with this purpose. However, that assumes that the proposal could go on to derelict or other urban land, or otherwise prevented its recycling. If it is the case that the proposal could not be accommodated on such land, my view is that there is no conflict with this purpose.
- 12.15 Only this proposal is before me and I am not able to consider the issue raised in representations in respect of potential cumulative harm as a result of other proposals.
- 12.16 I conclude that the proposed development is inappropriate development in the Green Belt, that it would cause significant harm to openness and would conflict with some of the purposes of including land in the Green Belt. In accordance with the Framework and with the CS, I will go on to consider other harm, other considerations and then whether very special circumstances exist.

Building a strong, competitive economy

- 12.17 Chapter 6 of the Framework sets out national planning policy in respect of building a strong, competitive economy. Paragraph 80 makes it clear that planning decisions should help create the conditions in which businesses can invest, expand and adapt; that significant weight should be placed on the need to support economic growth and productivity taking account both local business needs and wider opportunities for development; and that each area should be allowed to build on its strengths, counter any weaknesses and address the challenges of the future.
- 12.18 Paragraph 82 of the Framework makes it clear that planning decisions should recognise and address the specific locational requirements of different sections and specifically references storage and distribution operations at a variety of scales and in suitably accessible locations.
- 12.19 PPG Housing and Economic Development Needs Assessments is a material consideration. Paragraph 31 clearly highlights the importance of the logistics industry in enabling an efficient, sustainable and effective supply of goods and contributing to local employment opportunities. It references that strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks amongst other things.
- 12.20 The CS has regeneration at the heart of its spatial strategy. From the evidence given at the Inquiry it is clear that this strategy has not altered

although some of the means of how it can be achieved nearly a decade on from its adoption has. The significant need for large amount of new employment land leading into the preparation of the SHLP is in stark contrast to the 37 ha which the CS identified for the plan period.

- 12.21 Furthermore, the emphasis in the CS that regeneration could be prioritised through a focus on previously developed land must now be seen in the context of the evidence base for the SHLP to which I attach considerable weight. It is up to date and I have no demonstrable evidence that it is not robust or credible. It is clear that relying on previously developed land alone will not deliver the wider regeneration which the CS itself seeks to secure for St Helens.
- 12.22 St Helens has an important role to play in the economic growth of the LCR. The evidence shows that there is a need and opportunity for St Helens use its locational strengths to help support growth and regeneration in the LCR. The LCR SHELMA and evidence around the Freeport status show how this could be achieved.
- 12.23 St Helens has historically not been a borough to really look to capitalise on its strategic location and its locational assets. It is clear that Warrington for example has and the evidence presented in relation to the success of Omega is unquestionable. Omega has boosted the Warrington economy and the evidence presented by both Mr Hunt²⁹ and Mr Milloy³⁰ demonstrates the contrast been the two boroughs in recent years [7.25]. This is not all due to Omega but it is clear the site has played a major part in boosting employment in Warrington. And yet the two boroughs sit side by side along the M62.
- 12.24 It is however not just Warrington. Figures 3.4 and 3.5 of Mr Hunts proof of evidence are startling. St Helens has flatlined since 1984 and from 2009 to the present day. Every other borough in the LCR and Wigan has gone up and St Helens has been left behind. In the ten years to 2019 St Helens neighbouring authorities of Halton and Knowsley saw job numbers rise by over 30% and 25% respectively.
- 12.25 In terms of multiple deprivation and domains other than employment, St Helens is poor and getting worse [6.14-6.17]. I do not disagree with Mr Cannock's **view in his closing submission that this makes for grim reading.**
- 12.26 The employment land case for the proposal is in two parts. The TJM element is for a specific development following a search of potential sites for a third national distribution centre. The outline element largely seeks to provide more employment land and opportunities based upon employment land supply needs in Warrington and capitalising on the success and critical mass of Omega.

²⁹ CD38.3 Evidence of Andy Hunt

³⁰ CD 38.8 Evidence of David Milloy

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- 12.27 TJMs need for a distribution centre to serve its northern stores and future shop roll out is immediate. The application site was chosen after a site search and considerable work has been undertaken to ensure that a start on site could be made as soon as possible if planning permission was granted. For example, advance works to divert power cables was being undertaken on my site visit and the parties have worked to ensure that there are no pre-commencement conditions on the suggested list.
- 12.28 TJM is a successful local business and its ability to deliver a third distribution centre is not disputed. At the Inquiry Mr Clarke for the applicant gave evidence in relation to a potential fourth distribution centre at Doncaster. Mr Clarke stressed that the Doncaster site was not an alternative to Omega and that it was on a longer delivery timescale and was likely to serve a further roll out of stores beyond the planned phases. Mr Clarke said that there was no Plan B if the planning application for Omega was not successful.
- 12.29 It is clear from the evidence presented that there is shortage in the supply of readily available sites to meet the needs of major logistics operators in the North West. The evidence presented by both parties on this is not disputed. TJM has a particular site configuration requirement relating to the high tech and high bay system used which limits the potential pool of sites available in any case. The evidence on site availability and the logistics site market is not disputed.
- 12.30 I can understand the concerns of BCFAG, Bold Parish Council and others who question the potential numbers of jobs which could be delivered on the application site, particularly given their view of how job numbers on other sites may have been fewer than they believed would be the case at the planning stage. However, I have no demonstrable evidence that the numbers proposed will not be delivered and believe that they have been calculated on a credible evidence base which has been accepted by the Council.
- 12.31 The SHLP proposes that the outline part of the application site be allocated for employment, to meet the employment land 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.
- 12.32 Omega is reaching capacity with the Mountpark phase 2 part of the development being marketed and expected to be occupied this year. Warrington Borough Council gave planning permission in December 2020 for residential development on land which had been previously identified for employment within Omega on the basis that it was unlikely to come forward for the expected office use and that alternative B2/B8 uses would be unsuitable due to the proximity of housing³¹. Warrington Borough Council did not present evidence on employment land supply to the Inquiry but its

³¹ CD 38.4 Evidence of Sean Bashforth 5.22

position statement³² sets out that it agrees with St Helens Council that the 31 ha of land would contribute **to Warrington's** employment land needs.

- 12.33 The Warrington Economic Development Needs Assessment (EDNA)³³ identified an OAN of around 361.71 ha 2017-2037. **Mr Meulman's evidence**³⁴ references that Warrington Borough Council intended to meet this 362ha need through an existing supply of around 81ha plus Green Belt releases and allocations including the 31ha on the application site. The Green Belt releases and allocations in Warrington were identified within Policy DEV 4 of the Warrington Proposed Submission Version Local Plan. Work on that Plan has paused, and it can only be afforded very limited weight in any case. Nevertheless, 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. The evidence would tend to support the justification for the outline element of proposed development as an extension to Omega.
- 12.34 Around 1207³⁵ FTE jobs for the TJM scheme and around 2679³⁶ FTE jobs for the outline development is a significant number of jobs which would have a tangible benefit to the local economy. With measures such as the local employment scheme and bus service provision support set out in conditions and planning obligations this benefit is likely to be felt in the most deprived communities of St Helens. Furthermore, the evidence presented by Mr Clarke³⁷ demonstrates that the jobs associated with the TJM element can be delivered in the short term thereby providing an early opportunity to help address the deprivation issues highlighted. The absence of site constraints adds to this case.
- 12.35 The proposal would contribute around £141.5M in GVA to the St Helens **economy as presented in evidence by the Council's witness Mr Meulman**³⁸. This is a very significant uplift.
- 12.36 St Helens is in the highest priority group for the new Levelling Up Fund and has also been identified as a recipient of the Towns Fund. It also part of the Freeport bid. All these fit within the Build Back Better strategy in which more details were set out in the March 2021 budget. That St Helens is a priority for such initiatives illustrates how its regeneration challenges and opportunities align with the **Government 'Levelling Up'** agenda.

³² CD 43.73 Warrington Borough Council Position Statement

³³ CD 5.155.7

³⁴ CD Evidence of Anthony Meulman Section 3, Table 10.

³⁵ CD 44.14 Inquiry Document 14 Closing Submission of Applicant

³⁶ CD 44.14 Inquiry Document 14 Closing Submission of Applicant

³⁷ CD 38.7 Proof of Evidence of Mr Clarke (section 7)

³⁸ CD 39.2 Proof of Evidence of Mr Meulman (section 7)

Conclusion on Building a strong and competitive economy

- 12.37 The proposed development would deliver a significant number of jobs and provide a tangible boost to the local economy. St Helens has fallen well behind its immediate neighbours and other areas in the LCR and beyond in employment opportunities and deprivation scores. The evidence indicates that a major shift to bring forward new attractive employment sites is needed to halt or reverse this position.
- 12.38 The proposed development accords with the regeneration objectives of the CS. It accords fully with paragraphs 80 and 82 of the Framework and is supported by PPG. It aligns with and would complement recent Government initiatives to help level up deprived areas.
- 12.39 In conclusion the proposed development would accord with local and national policies for building a strong and competitive economy.

Whether there is other harm

Character and appearance

- 12.40 The site has an open countryside character although that is affected by the presence of both the M62 and the existing Omega development. The 2006 landscape character assessment³⁹ predates the Omega development. I consider that is of limited weight as the character of the application site, particularly the eastern part of it, has changed as a result.
- 12.41 The large warehouse units at Omega are visible across much of the site in views to the east and their presence does have an influence on character. In parts of the site and away from the M62 the character has a more open countryside feel especially in looking south and west.
- 12.42 The woodlands on the site and in particular Booths Wood contribute greatly to this countryside character. Booths Wood is a dense and established woodland. It is prominent in views from the south and west from the public right of way and from the M62. The proposed development would harm the contribution that Booths Wood makes to the character of the landscape.
- 12.43 Further away from the site the impact of the proposed development on the character of the Bold Forest Park as a whole would be less although the TJM building would still be visible above the treeline in certain views. It would result in the permanent loss of open land and woodland features and bring built form further into the Forest Park.
- 12.44 The proposed development includes a substantial amount of additional landscaping on and off site. Nevertheless the proposal is of a significant size, scale, height, form and extent. It would for the reasons set out above, cause significant harm to landscape character of the area and would be contrary to

³⁹ CD 4.134 Landscape Character Assessment for St Helens 2006

Policies COL4, CP1 (i) and CAS 5 2 (iii) of the CS. It would also be contrary to the AAP which amongst other things seeks to enhance the landscape character of the Bold Forest Park.

Heritage

- 12.45 There are designated heritage assets in the vicinity of the site. These are the Old Bold Hall moated site (a scheduled ancient monument), Old Bold Hall bridge and gate piers (Grade 2 listed), Bold Hall Estate Farmhouse (Grade 2 listed) and Bold Hall Estate outbuilding (Grade 2 listed).
- 12.46 In respect of Old Bold Hall site which lies around 300m from the application site, removal of part of Ducks Wood would reduce natural screening to the east and would remove a feature of the former parkland. The proposed buildings, at around 41m in height for Unit 1 and up to 19m in height for the outline, would be visible and there would be harm notwithstanding the presence of additional landscaping. Great weight should be given to the asset's conservation in accordance with paragraph 193 of the Framework and caselaw [7.40].
- 12.47 The listed buildings of the Bold Hall estate lie to the north of the application site across the M62. They were formerly part of or connected to the now demolished Bold Hall. Although the landscape in this area has changed with the construction of the Omega site and the motorway, the proposal would nevertheless cause further adverse harm to the setting as the height and the scale of the buildings will dominate the view.
- 12.48 The proposal would be contrary to policies CLQ4 of the CS which seeks to protect heritage and landscape, Policy ENV25 of the UDP which seeks to protect listed buildings and Policy ENV3 of the AAP which seeks to protect the heritage of the Bold Forest Park.
- 12.49 I consider that the harm to the listed buildings would be less than substantial. In accordance with paragraph 196 of the Framework the harm will need to be weighed against the public benefits of the proposal.
- 12.50 The applicant and the Council depart in their positions in respect of the area of the medieval deer park. The impact of the proposal on this was also a concern raised by BCFAG and others [8.6]. The Council considers that there would be some heritage harm. The applicant considers that there are no tangible remains of the deer park and therefore there would be no harm. Historic England does not require any further archaeological surveys and does not raise any objections to the proposal.
- 12.51 Merseyside Environmental Advisory Service (MEAS) considers that no further surveys would be required in this regard. I place significant weight on the views of those representations. I consider that there is no compelling evidence that there would be any material harm to this or to any other non-designated heritage asset as a result of the proposal.

Ecology

- 12.52 The application is supported by detailed ecological assessments the basis of which have been agreed with MEAS. At the round table session on Ecology, Mr Hilton, a local farmer, considered that the surveys had not appropriately taken account of some species such as brown hare. Mr Morgan for the applicant considered that the brown hare would tend to move westwards and that there would be ample habitat including within **the 'green triangle'**.
- 12.53 There would be a significant loss of natural habitat including a loss of priority woodland and non-priority woodland. BCFAG representatives expressed concern about a loss of potential woodland but on the evidence I am satisfied with the applicants view that there would be no loss of designated Ancient Woodland as there is none on or near to the site. The Tree Preservation Order status of woodland on the site is one based on amenity not ecology.
- 12.54 Whilst on-site mitigation to compensate for habitat loss would be provided particularly **in the 'green triangle'**, this would take time to mature. In the **Council's view** there would be some harm as a result. I accept this would lead to some minor temporary harm.
- 12.55 The planning obligation provides for off-site biodiversity compensation which has been calculated in accordance with an established and agreed formula. I have referred to this within the section of my report dealing with planning obligations. Mr Morgan⁴⁰ considers that there would be some biodiversity net gain as a result of this obligation.
- 12.56 Taking in account the on-site and off-site provision for mitigation and the scheme detail, I consider that overall there would be no harm to ecology as a result of the proposal and that it would accord with policies CQL1, CQL2 and CQL3 of the CS and policies BFP ENV1 and BFP ENV2 of the AAP.

Air Quality

- 12.57 None of the St Helens Air Quality Management Areas (AQMA) cover the site. One AQMA in Warrington, focussed around the M62 junction, touches the edge of the site. It is agreed by the parties that there would be no exceedance of Air Quality Standards in set DEFRA guidance.
- 12.58 A number of measures to help mitigate air quality impacts are embedded into the scheme including the location of electric car charging points, planning obligations to secure bus provision, and the construction management plan secured by planning condition.

⁴⁰ CD 38.6 Proof of Evidence of Mark Morgan

12.59 On the evidence before me I am satisfied that the proposal accords with Policy CP1 (3i or 3ii) of the CS which seeks to minimise impacts on air quality, and with paragraph 181 of the Framework.

Noise and vibration

12.60 A number of sensitive receptors would be subject to construction noise with the closest ones being at Old Hall Farm at Bold, Bembridge Close Warrington and the Stepping Stones nursery on Omega.

12.61 Stepping Stones nursery is planned to relocate away from its current site to a location further into the Omega scheme. Nevertheless the assessment is based upon it remaining in situ.

12.62 The dwellings on Bembridge Close would be subject to construction noise but since the distance would be around 342 m the level of such noise would be low and vibration effects would not be significant. The operational long term effects on the properties on Bembridge Close are shown in the studies to be low and not of significance for either day time or night time operations. Noise mitigation measures in respect of acoustic barriers will be required. Acoustic barriers would also be in place to mitigate noise to the east of the site, on the nursery. There is likely to be some adverse effects on respect of piling during construction but a condition is imposed to require details of these works to be submitted and approved.

12.63 Overall subject to conditions, I consider that the proposed development would not have a materially harmful effect on the living conditions of nearby residents or occupants of other sensitive receptors. The proposal would accord with Policy CP1 of the CS in this regard.

Agricultural Land

12.64 The proposal would result in the loss of around 69.5ha of agricultural and of which 47.2 is Grade 3b, 17.5 ha is 3a and the remainder Grade 4 (poor quality). Paragraph 112 of the Framework and Policy CP1 of the CS seek to minimise the loss of the best and most versatile agricultural land, which is classed as Grade 3a and above. This would relate to 17.5ha of the site.

12.65 Clearly this would result in some harm, but I conclude that this would be of a minor nature given its scale in relation to the overall site. I conclude that this would not conflict with either Policy CP1 of the CS or paragraph 112 of the Framework.

Transport

12.66 The application is supported by Transport assessments. There were a considerable number of representations made at the planning application stage from local residents who were concerned about the impact of additional traffic on the highway network and on the local community. I am however satisfied that the transport assessments and evidence are robust.

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- 12.67 The application site lies close to junction 8 on the M62 and access to the site is via Catalina Way. This is a major locational advantage of the site and means that commercial traffic associated with the development can easily access the motorway network without having to travel through the local community. Subject to provision for highway alterations in the vicinity of that junction, there is no objection to the proposal from the highway authorities. Those works have either been completed or were due to be completed shortly after the end of the Inquiry.
- 12.68 As set out earlier in my report, there is a package of measures to secure sustainable transport including planning obligations relating to supporting bus service provision between the site and communities within St Helens and within the wider Omega development, the provision of car charging points, cycleway access, and a travel plan programme based upon **Warrington Borough Council's experience at Omega.**
- 12.69 I conclude that the proposal is acceptable in transport terms and accords with Policy CP2 of the CS which seeks to create an accessible St Helens. It also accords with paragraphs 108 and 109 of the Framework which seek to promote sustainable transport and prevent severe impact on the highway network.

Climate Change

- 12.70 This is a logistics based proposal which will rely upon vehicular movement by its very nature. BCFAG is concerned that the proposal is at odds with the **Government's Climate Change commitments.**
- 12.71 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. My attention was also drawn to the Secretary of State appeal decision⁴¹ relating to a proposal by Eddie Stobart and Liberty Properties which indicated that there was no objection to logistics based development on climate change grounds.
- 12.72 The proposal includes electricity car charging points. On my site visit I observed the existing CNG fuelling station very close to the vehicular access to the site. This provides an opportunity for HGVs to use such fuels. The agreed CEMP provides measures to minimise material use and waste. I have concluded already on the issue of sustainable transport and that the proposal accords with Policy CP1 of the CS.

⁴¹ CD 3.16 Decision Letter from Secretary of State November 2020

Other matters

- 12.73 I am satisfied that with the appropriate conditions imposed, particularly those relating to the Whittle Brook, that the proposal will minimise the potential for flood risk.
- 12.74 The proposal will require lighting of buildings, service yards, roads and car parks. This will inevitably lead to harm to the night sky. However, the separation distances involved and the imposition of conditions to control details will ensure that lighting would not have a harmful effect on the living conditions of the occupants of residential properties in the area.
- 12.75 On my site visit I observed the use of land close to the site for equestrian purposes, particularly the fields in the area north of the Mersey Valley Golf and Country Club. With the exception of the public right of way across the north western tip of the site which would remain, the application site does not have public access. On the evidence before me I consider that the proposal would not have a harmful effect on the ability of the wider area to accommodate equestrian activities or any other recreation activities.

Other considerations

- 12.76 I have already set out in the sections above and in particular that relating to the economy, the main benefits of the proposal. I will not repeat them here. Essentially the proposal will provide a significant number of operational jobs both within the full and outline elements jobs which would provide a critical boost to the St Helens economy and support the regeneration objectives of the Council as set out in its CS. Those jobs, in the TJM element in particular would include higher skilled positions and training opportunities. I place moderate weight on the construction jobs the proposal would create.
- 12.77 The levels of deprivation in St Helens are high and have been getting worse over recent years in comparison to neighbouring authorities and the national picture. I place very significant weight on the benefit that the jobs to be delivered by this proposal, and those which would come indirectly from it, would have on the local economy and the local community.

Planning Balance and Overall Conclusions

- 13.1 The proposal is inappropriate development in the Green Belt and there would be harm by reason of inappropriateness, to openness and to some of the purposes of including land in the Green Belt. This harm attracts substantial weight. There would be less than substantial harm to heritage assets which would need to be weighed against the public benefits of the proposal. There would be significant harm to landscape character to which I give significant weight. The loss of agricultural land would be of minor harm to which I attach limited weight and would not conflict with policy.
- 13.2 I have concluded there is no material harm to ecology; air quality; the living conditions of the occupants of neighbouring properties due to noise or vibration; flood risk or the ability of the wider area to accommodate

recreational activities. I have also concluded that the proposal accords with policies for sustainable transport and climate change.

- 13.3 Against the above harms I must weigh the benefits of the proposal. The socio-economic benefits attract very significant weight. In any location a proposal such as this would be capable of attracting significant weight. In St Helens the deprivation picture is very bleak. It is startling how the area has fallen behind its neighbours in creating job opportunities over recent years. Yet its strategic location, on the M62 and close to the ports offers opportunities to St Helens which have not being fully capitalised on. This position adds further weight in favour of the proposal especially as provisions in conditions and planning obligations can be used to secure opportunities for the most deprived communities in St Helens. This differentiates the proposal from say further development within Omega.
- 13.4 The success of Omega shows how a well located and planned logistics development can boost the local economy. The application site lies immediately adjacent to that successful development and would be served through it directly to the M62. Furthermore, in relation to the TJM part of the proposal at least, the benefits would flow early on given the commitment from and need of that company to bring its third national distribution centre on stream as a matter of priority and in the absence of site constraints. The ability of the proposed development to deliver significant socio-economic benefits at an early point following planning approval weighs strongly in its favour.
- 13.4. (13.4a) When taken together I consider that the Green Belt harm and other harms I have found are outweighed by the other considerations which I have identified. In this balance I also consider that the public benefits of the proposal outweigh the less than substantial harm to the designated heritage assets. I therefore conclude that very special circumstances exist to justify the application being granted planning permission.
- 13.5. The proposal accords with Policies S1, GB1 and GB2 of the UDP. There is conflict with certain policies of the CS and AAP as I have identified. Of particular relevance there is conflict with Policy CP1 (i) and CAS 5 2 (iii) of the CS in respect of landscape character. However, there is compliance with other policies and with the strategy and objectives of those plans. Overall, I conclude that the proposal accords with the development plan when taken as a whole.
- 13.6. The proposed development accords with national and local planning policy on both building a strong competitive economy and on Green Belt. In accordance with paragraph 11 of the Framework the development should be approved without delay.

Planning Conditions

- 14.1. I have made alterations to some of the suggested conditions for clarity, precision, elimination of duplication and having taken account of the advice in PPG. I have also re-ordered some of the conditions to reflect the advice in paragraph 24 of the PPG.
- 14.2. Condition 1 applies to both the full and outline components and sets out the floorspace limits and restrictions. This is necessary for certainty and to ensure that the development accords with that subject to environmental assessment and the submitted evidence. For the remainder of the conditions as suggested by the parties, I have split them into those that relate to the full application, and those which relate to the outline.

Conditions for the full element

- 14.3. In addition to the standard time condition there is a need for a condition setting out the plans to which the permission relates. This is for certainty.
- 14.4. A further condition requires more detail to be submitted in relation to the fuelling and vehicle wash facility prior to installation, in the interests of amenity. A condition is also imposed to ensure that proposed site levels are adhered to in the interests of certainty.
- 14.5. A condition is imposed to restrict the change of use of Unit 1 from B8/ancillary offices to ensure that the development accords with that subject to environmental assessment and the submitted evidence.
- 14.6. Conditions are imposed to control noise in the interest of amenity. It is necessary for a condition to require the detail of electric car charging point provision in the interests of air quality.
- 14.7. A number of conditions are required to ensure the construction and implementation of highways related infrastructure on and off site in the interests of highway safety and sustainable transport. A condition is also necessary to secure the submission and implementation of a travel plan in the interests of sustainable transport.
- 14.8. The Council has approved a Construction Management Plan and a condition is necessary to ensure its implementation in the interests of amenity.
- 14.9. A number of conditions are imposed to ensure ecological protection and mitigation in the interests of ecology. A condition is also required to control the detail of the proposed lighting on the cycle path in the interests of ecology and amenity.
- 14.10. Landscaping conditions are imposed to secure landscape planting works in accordance with the approved plans and to ensure protection of retained trees, in the interests of arboriculture and character and appearance.
- 14.11. In the interests of ecology and flood risk, there is a need for conditions to ensure that the drainage scheme is implemented in accordance with the

submitted drainage plans and that a buffer zone around the Whittle Brook is provided, maintained and managed. A condition is imposed to secure the submission of a verification report to ensure that boreholes on the site have been decommissioned appropriately in the interests of the environment.

- 14.12. Two conditions are imposed to secure a local employment scheme for both the construction and operational phases of the scheme in the interests of the local community.

Conditions for the outline element

- 14.13. Many of the conditions relating to the outline element are imposed for reasons which are similar for the full element. I will not repeat the reasons.
- 14.14. The standard condition relating to the submission of reserved matters applications is imposed and this will relate to appearance, landscaping, scale and layout. A further condition is imposed to require details of materials in the interests of character and appearance. A phasing plan is also necessary in the interests of the effective planning of the development. A condition is also necessary to require details of lighting to be submitted as part of the reserved matters applications.
- 14.15. Conditions are necessary in respect of landscaping and landscape management, ecology and highways. A ground condition survey is required to be submitted in the interests of the environment and a condition is imposed to secure this.
- 14.16. Conditions are also imposed to require the submission and approval of a construction environmental management plan, a local employment scheme, and a drainage scheme.
- 14.17. The Whittle Brook extends into the area of the site covered by the outline and a condition is necessary in the interests of flood risk and ecology to require the submission and approval of provision and management scheme for a buffer zone around it. A further condition is required to ensure the provisions of the submitted flood risk assessment are met.
- 14.18. A number of detailed conditions relating to noise and vibration are necessary in the interests of amenity.

Planning Obligations

- 15.1. The Biodiversity contribution is to provide off site habitat mitigation as a direct result of the proposed development. It has been calculated in accordance with DEFRA guidance and detailed evidence was given on this by Mr Morgan at the Inquiry. It is necessary in accordance with the policies of the CS including Policies CQL1, CQL2 and CQL3 which collectively aim to protect and enhance green infrastructure and habitats and Policy BFP ENV1 of the AAP which aims to enhance landscape character and tree cover in the Bold Forest area.

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- 15.2. The Bold Forest Park Infrastructure contribution is to be used for Bold Forest park initiatives. It is justified by Policies CQL1 and COL3 of the CS and Policy BFP SN2 of the AAP which requires local development to contribute to infrastructure in the Bold Forest park.
- 15.3. The Public Transport Contribution is a contribution towards bus service provision to link the site to the communities in St Helens. It is justified by Policies CSS1 and CE1 of the CS which respectively set the overall spatial strategy and promote a strong and stable economy, and by policies CIN1 and CP2 of the CS which promote the meeting of infrastructure needs and creating an accessible St Helens.
- 15.4. Although it is called the Highways Contribution in the obligation, this is a contribution towards public transport provision in Warrington and will be used to support bus services serving the site. The complements the St Helens bus service enhancements sought and the contribution is also supported by policies set out above and those within the Warrington Local Plan including Policy MP1 which sets out general transport principles and Policy MP7 which requires transport assessments and travel plans for relevant new developments. The Travel Plan contribution is justified by the same policies and by paragraph 108 of the Framework.
- 15.5. The revocation of the Omega South planning permission in Warrington is justified as the permission for B1a office space is no longer been taken forward as the Council has approved residential development on the site. This revocation would then mean that likely use of the site would accord with the highways evidence in support of the proposal.
- 15.6. If the Secretary of State is minded to grant planning permission for the development, I am satisfied that the financial contributions requested are necessary to render the development acceptable in planning terms and that they are directly related to the development. Having regard to the costings set out in evidence I am also satisfied that they are fairly and reasonably related in scale and kind to the development proposed. I am also satisfied that the other provisions meet the same tests in CIL regulations and the Framework.
- 15.7. I recommend that the provisions in the S106 be taken into account in assessing the application.

Recommendation

- 16.1 I therefore recommend that planning permission should be granted, subject to the imposition of conditions set out on the attached schedule and subject to the provisions in the Section 106 agreement.

Mike Worden

INSPECTOR

ANNEX A APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

| | |
|------------------|--|
| Giles Cannock QC | Kings Chambers, Instructed by Mark Fisher, St Helens Council |
| He called | |
| Alyn Nicholls | Town Planner, Alyn Nicholls |
| Anthony Muelman | Associate Director, BE Group |
| Edward Mellor | Divisional Director, Mott MacDonald |
| Jennifer Bolton | Senior Planning Officer, St Helens Council |

FOR THE APPELLANT:

| | |
|--------------------------------|---|
| Peter Goatley QC | No 5 Chambers, instructed by the applicants |
| He called | |
| Sean Bashforth | Board Director, Quod |
| Andrew Pexton | Director, NW Industrial and Logistics team, JLL |
| Andy Hunt | Director, Socio-Economics team, Quod |
| Douglas Bisset | Technical Director, WSP |
| Mark Morgan BSc (Hons), MCIEEM | Senior Ecologist, Ecology Practice |
| James Clarke | Group Legal Counsel, T.J. Morris Ltd |
| David Milloy | Managing Director, M2 Group (Miller Developments) |
| Mark Steele BA, DipLD, CMLI | Mark Steele Consultants |
| Stuart Bennett | Associate Director (Air Quality) WSP |
| Elizabeth Murray BA MCifA | Principal Heritage Consultant, WSP |
| James Powlson | Associate Director, Acoustics Team, WSP |
| Colin Graham | Associate Director, Miller Developments |

FOR WARRINGTON BOROUGH COUNCIL (Section 106 and Conditions Round Table)

| | |
|---------------|---|
| Martha Hughes | Principal Planning Officer |
| Mike Taylor | Transport Development Control Team Leader |
| Alyn Jones | Specialist Transport Services Manager |

INTERESTED PERSONS:

| | |
|--------------------------------------|--|
| Christopher Hughes | Bold and Clock Face Action Group (Chairman) |
| Robert Hilton | Bold and Clock Face Action Group (Local farmer) |
| Elizabeth Lloyd | Bold and Clock Face Action Group (Local resident) |
| Gary Conley | Bold and Clock Face Action Group (Local resident) |
| Jackie Copley MRTPI BA (Hons) PgCERT | Bold and Clock Face Action Group (Planning Consultant) |

Allen Makin
Councillor David **O’Keefe**

Councillor Richard McCauley

Bold Parish Council (Chairman)
Bold Parish Council and Ward Councillor for Bold,
St Helens Council
Cabinet Member for Regeneration and Planning,
St Helens Council

ANNEX B DOCUMENTS SUBMITTED DURING THE INQUIRY

- 1 **Applicant’s Opening Submission**
- 2 **Council’s Opening Submission**
- 3 Statement of Bold and Clock Face Action Group
- 4 Statement of Councillor Richard MaCauley, St Helens Council
- 5 Statement of Mrs Elizabeth Lloyd
- 6 Information submitted by Applicant in relation to The Hut Group planning consent at Omega
- 7 Information submitted by Applicant in relation to Lingley Mere Nursery
- 8 Statement from TJM relating to contractual commitment to Unit 1
- 9 **Statement of Councillor O’Keefe, Bold Parish Council**
- 10 CIEEM 2019 Biodiversity Net Gain – A practical guide, submitted by Applicant
- 11 Map showing location of existing and proposed CNG fuel stations, submitted by Applicant
- 12 Explanatory Note on public transport contributions submitted by Warrington Borough Council
- 13 **Council’s Closing Submission**
- 14 **Applicant’s Closing Submission**

These documents and all Core Documents can be found in the Inquiry Library accessible through this website: <https://www.omegawestdocuments.com/>

ANNEX C SCHEDULE OF RECOMMENDED CONDITIONS IN THE EVENT THAT PLANNING PERMISSION IS GRANTED

Conditions which apply to all parts of the development

- 1) The development hereby approved permits a total of 205,500 sq.m (approximately 2,212,002 sq.ft) of floorspace within the red line application site. There will be a 30% B2 and 70% B8 split within this total floorspace in accordance with the Environmental Statement Volume 1 chapter 3 point 3.3.7

Conditions for the full application

- 2) The works hereby permitted must be begun within 3 years of the date of this decision notice.
- 3) The development shall be carried out in accordance with the following plans unless otherwise required by another condition.

Plans

- OPP DWG. 2 4150-00001-PL6 Site Location Plan
- OPP DWG. 3.1 4150-05105-PL4 Parameters Plan 1 - Outline and Detailed Application Boundaries
- UNIT 1 DWG. 1 6385 - 181 Rev. G Proposed Site Layout Plan
- INFRA DWG. 14.15969-Z8-BR-100 Rev. A Bold Hall Bridge South Ramp Works

Floorplans

- UNIT 1 DWG. 0 6385 - 180 Rev A Proposed Building Plan
- UNIT 1 DWG. 3 6385 - 183 Rev. C Ground Floor Office Layout Plan
- UNIT 1 DWG. 4 6385 - 184 Rev. C First Floor Office Layout Plan
- UNIT 1 DWG. 5 6385 - 185 Rev. C Second Floor Office Layout Plan
- UNIT 1 DWG. 6 6385 - 186 Rev. B Proposed Roof Plan

Elevations

- UNIT 1 DWG. 2a 6385 - 193 Rev. A Proposed Elevations No Hatch

Associated Infrastructure

- UNIT 1 DWG. 15 6385 - 192 Gate Details
- UNIT 1 DWG. 8, 9 & 10 6385 - 188 Rev. A Gatehouse, Smoking Shelter & Cycle Shelter Details
- UNIT 1 DWG. 28 CPW-190081-M-SK-03-P6 Mechanical and Electrical Plant Locations Sketch

- INFRA DWG. 22 4150-CA-00-00-DR-A-P1 Primary Substation Elevations
- INFRA DWG. 23 4150-CA-00-00-DR-A-P2 Typical Customer Substation
- INFRA DWG. 24 4150-CA-00-00-DR-A-P2 Substation Fencing Plan

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- INFRA DWG. 25 4150-CA-00-00-DR-A-P1 Typical Gas Governor
 - UNIT 1 DWG. 16 190081-E-EXT--XX-01 P4 External Lighting Strategy
 - Lux Levels / Light spill Rev. P4 Levels

Highways

- Plan ref: 5969-Z8-GA-115 Rev A entitled 'Infrastructure Works Visibility Assessment' and
- Plan ref: 5969-Z8-GA-100 Rev A entitled 'Infrastructure Works Swept Path Analysis' both within Appendix D 'External Works Assessment'.
- INFRA DWG. 1.1 5969-Z8-GA-100 Rev A entitled 'Highways Works General Arrangement Sheet 1 of 2'
- Plan ref: 11191042_SK326/A entitled '
- Plan ref: 11191042_SK326

Levels Plans

- UNIT 1 DWG. 26 131504 Rev. E Overland Flood Flow (Exceedance) Routing,
- INFRA DWG. 19 5969-Z8- EWK-200 Rev. C Full Proposed Levels and
- INFRA DWG. 20 5969-Z8-EWK-201 Rev. C Full Proposed Sections

Overall landscaping plans

- OPP DWG. 5 POE_199_001 Rev. H Landscape Strategy
- INFRA DWG. 17 POE_199_007 Rev. A Tree Planting Landscape Details
- INFRA DWG. 18 POE_199_009 Rev. G Full Landscape Proposals
- INFRA DWG. 21 POE_199_010 Rev. D Detailed Application Site Context
- UNIT 1 DWG. 31 131504 Rev. B Head Wall Outfall and Tree Removal Plan
- Tree Protection Plan Drg No RSE_3152_TPPa Rev 9;
- Tree Protection Plan Drg No RSE_3152_TPPb Rev 9;
- Tree Protection Plan Drg No RSE_3152_TPPc Rev V9; and

Around Unit 1 landscaping plans

- UNIT 1 DWG. 13a 2138 - PL001-1 Rev. G Preliminary Landscape Proposals (Sheet 1 of 3)
- UNIT 1 DWG. 13b 2138 - PL001-2 Rev. F Preliminary Landscape Proposals Sheet 2 of 3)
- UNIT 1 DWG. 13c 2138 - PL001-3 Rev. G Preliminary Landscape Proposals (Sheet 3 of 3)
- UNIT 1 DWG. 13d 2138-PL001-4 Rev A Omega Z8 Sitting area – Preliminary Hard

Landscape Proposals

- UNIT 1 DWG. 11 6385 – 189 Rev. G Proposed External Finishes Plan
- UNIT 1 DWG. 12 6385 – 190 Rev. E Dropped Kerb & Tactile Paving

North West Landscaping 'Green Wedge' and cycle path through site

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- INFRA DWG. 14 POE_199_004 Rev. E Structural Landscape-Proposed & Existing Contours
 - INFRA DWG. 15 POE_199_005a Rev. H Detailed Planting Plan Sheet 1 of 2
 - INFRA DWG. 26 POE_199_005b Rev. F Detailed Planting Plan Sheet 2 of 2
 - OPP DWG. 6 POE_199_002 Rev. D Indicative Landscape Sections

Boundaries

- UNIT 1 DWG. 14 6385 – 191 Rev. H Fencing Details

Ecology

- INFRA DWG. 12 16903-11ES Rev. C Bat Box Proposals'
- INFRA DWG. 13 16903-12ES Rev. C Bird Box Proposals

Drainage

- UNIT 1 DWG. 24 131504 Rev. F Surface Water Drainage Layout
- UNIT 1 DWG. 25 131504 Rev. E Foul Drainage Layout Rev. D
- UNIT 1 DWG. 26 131504 Rev. E Overland Flood Flow (Exceedance) Routing
- UNIT 1 DWG. 29 131504-2230 Rev. C Western Pond Sections and Northern and

Southern Swale Details

- UNIT 1 DWG. 30 131504-PC-2231 Rev. A Ordinary Watercourse Diversion
- UNIT 1 DWG. 31 131504 Rev. B Head Wall Outfall and Tree Removal Plan
- UNIT 1 DWG. 32 131504 2110 Rev. B Watercourse Diversion Works General

Arrangement

- UNIT 1 DWG. 33 131504 Watercourse Diversion Works Long-sections
- OPP DWG. 11 5969-Z8-GA-117 Drainage Maintenance Plan Rev. A

- 4) Notwithstanding plan ref: UNIT 1 DWG. 27 6385 - 197 Indicative fuelling & Vehicle Wash Details and the site layout plan 6385 – 181 Rev. G, scaled drawings of the fuelling and vehicle wash, sprinkler house, tanks as cage storage as indicated on the layout plan, along with a timetable of implementation, shall be submitted to and approved in writing with the Local Planning Authority prior to installation. Only the approved details shall be implemented.
- 5) **The site's levels shall be constructed in accordance with those shown on** plan ref: UNIT 1 DWG. 26 131504 Rev. E Overland Flood Flow (Exceedance) Routing, INFRA DWG. 19 5969-Z8- EWK-200 Rev. C Full Proposed Levels and INFRA DWG. 20 5969-Z8-EWK-201 Rev. C Full Proposed Sections. Any change in levels shall be shown on existing and proposed plans and submitted and agreed in writing with the Local Planning Authority. Only the approved details shall be implemented.

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- 6) Unit 1, hereby shown on the plans identified in Condition 3, falls within Use Class B8. Notwithstanding the provisions of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, and any Order revoking or re-enacting that order, no change of use shall take place within Unit 1, as identified on the plans in condition 3. The unit shall remain Use Class B8 with ancillary offices, unless planning permission is sought from and granted by the Local Planning Authority.
 - 7) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 3, Class I and P, Part 7, Class H or any Order revoking or re-enacting that Order, no further development shall take place within the curtilage of Unit 1, as identified on the plans within Condition 3, unless planning permission is sought from and granted by the Local Planning Authority.
 - 8) Construction work shall not take place outside 07.00-19.00 hours Monday to Friday, 07.00 - 14.00 hours Saturday and not at all on Sundays/Public Holidays without the prior written permission of the Local Planning Authority. The exception to this is activity which is outlined in Section 8.1 **'Hours of Work and Appendix H ('Night-Time Construction Noise Technical Note', prepared by WSP) of document titled "Construction Environment Management Plan Unit 1 : Doc 7, Omega Zone 8, St Helens /TJ Morris Ltd dated April 2020."** prepared by Quod on behalf of TJ Morris Ltd.
 - 9) No temporary power plant shall be used outside the permitted hours of construction unless in accordance with details which have been submitted to an approved in writing by the Local Planning Authority. Any such plant shall only be operated in accordance with the approved details. The exception to this **is activity which is outlined in Section 8.1 ('Hours of Work') and Appendix H ('Night-Time Construction Noise Technical Note'** prepared by WSP) of document titled "Construction Environment Management Plan Unit 1 : Doc 7, Omega Zone 8, St Helens /TJ Morris Ltd dated April 2020." prepared by Quod on behalf of TJ Morris Ltd.
 - 10) Prior to the first occupation of Unit 1 as identified on the plans in Condition 3, or first use of the car park as shown on plan ref: 16385-181 Rev. G hereby approved, electric car charging infrastructure comprising at least one electric car charging point for every 30 car parking spaces hereby approved shall be provided on the site. As a minimum, 4 charging points shall comprise a dedicated 32 amp radial circuit which is directly wired to an appropriate RCD at the consumer unit and terminates at a BS EN 62196 Type 2 electric vehicle charging point located where it is accessible from a dedicated **off-street car parking bay. Additional 'active' spaces (up to a maximum of 39 as shown on the Proposed Site Plan)** shall be provided subject to demand. The infrastructure shall remain in perpetuity.
 - 11) Prior to the first occupation of Unit 1, the proposed new bus stop / shelter infrastructure, as illustrated in Figure 4-2 of the Transport Assessment shall be implemented in accordance with precise scheme details that have first been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented.
 - 12) Prior to the first occupation of Unit 1, the internal highway infrastructure, shall be constructed to binder course surfacing level (or block paved) and shall be available for use in accordance with the approved plans.

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- 13) Prior to the first occupation or use of Unit 1, the areas indicated on the submitted plans to be set aside for parking and servicing shall be surfaced, drained and permanently marked out or demarcated in accordance with the details and specifications shown in drawing number 6385-181 G. The parking and servicing areas shall be retained as such thereafter and shall not be used in a manner that prevents the parking of vehicles.
 - 14) Prior to occupation of Unit 1 the Phase 1 roads as shown on INFRA DWG. 1.1 5969-Z8-GA-100 Rev A entitled '**Highways Works General Arrangement Sheet 1 of 2**' shall be built to the approved standards and available for use. The roads shall be maintained in accordance with the management and **maintenance details outlined in Infra Doc.6 "Highways Management & Maintenance of Omega Roadways Document" (July 2020) until such times** as a private management and maintenance company has been established or until such time as an agreement has been entered into under the Highways Act 1980.
 - 15) Prior to the first occupation of Unit 1, mitigation including the widening works between M62 J8 and Skyline Drive / Fairchild Road roundabout, and remarking of M62 exit slip to provide two lanes to Skyline Drive (as outlined in drawing 11191042_SK326/A) shall be implemented, to ensure the junction lane use and exit geometry is consistent with traffic modelling submitted.
 - 16) Prior to the first occupation of Unit 1, the 3 metre high fence as shown on plan ref: 6385-191 Rev H shall be erected along the northern boundary of the development site and shall not be within one metre from any part of the existing motorway fence. Thereafter, the fence shall remain in situ and only be repaired or replaced in accordance with the requirements of this condition.
 - 17) Prior to the first occupation of Unit 1, a verification report which confirms the successful decommissioning of boreholes within zones 2 and 3 as shown on plan ref: LA100018360 2020 (attached to the LPA Contaminated **Land officer's response**) and in accordance with the submitted strategy (WSP, Omega Zone 8, Monitoring Well Decommissioning Strategy, 17th March 2020), shall be submitted to and agreed in writing with the Local Planning Authority.
 - 18) Prior to the first occupation of Unit 1, a lighting scheme for the cycle pathway as shown plan ref: 1 6385 – 181 Rev. G shall be submitted to and agreed in writing with the Local Planning Authority. The lighting scheme shall take into consideration and include measures to protect the ecology. Only the approved lighting shall be implemented.
 - 19) Prior to the first use of Unit 1, a Local Employment Scheme for the operational phase of that building shall be submitted to, and approved in writing by, the Local Planning Authority. The submitted Local Employment Scheme shall demonstrate how the development will use all reasonable endeavours to recruit at least 20% of labour from within the Borough of St Helens, focusing on the most deprived Super Output Areas. The Scheme shall include the following:
 - a) Details of how the initial staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies such as the Local Chamber and job centres 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;

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) A procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the St Helens Borough Council including details of the origins qualifications numbers and other details of candidates; and,

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

The development shall be implemented in accordance with the approved Scheme.

- 20) **Notwithstanding 'INFRA DWG. 12 16903-11ES Rev. C Bat Box Proposals'**; prior to the first occupation of Unit 1, details of bat boxes within the boundary of the detailed element of this application (as shown on OPP DWG. 3.1 4150-05105-PL4) shall be submitted to and approved in writing by the Local Planning Authority. For the avoidance of doubt the details shall be shown on a scaled plan and include the quantity, type, location and timing of installation. Only the approved details shall be implemented.
- 21) **Notwithstanding 'INFRA DWG. 13 16903-12ES Rev. C Bird Box Proposals'**, prior to the first occupation of Unit 1, details of bird boxes within the boundary of the detailed element of this application (as shown on ref: 4150-05105-PL4) shall be submitted to and approved in writing by the Local Planning Authority. For the avoidance of doubt the details shall be shown on a scaled plan and include the quantity, type, location and timing of installation. Only the approved details shall be implemented.
- 22) No additional external plant or equipment shall be permitted on site, nor shall any additional openings be formed in the elevations or roof of Unit 1, hereby permitted, which directly ventilates the building or which discharges from any internal plant or equipment, until a scheme has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented.
- 23) The rating level of noise emitted from the fixed plant and equipment serving Unit 1 shall not exceed those quoted in Table 7.7-4 **"Fixed plant and equipment noise limits"** of Appendix 7.7 **Industrial/Commercial Noise Assessment - Environmental Statement Vol 2 – OPP DOC. 11.20** prepared by WSP and dated Dec 2019 at the specific receptors identified. Any assessment to determine compliance with the quoted levels shall be made in accordance with the method provided in BS4142:2014 + A1:2019 **"Methods for rating as assessing industrial and commercial sound"** and shall be carried out by a suitably qualified acoustic consultant/competent person.
- 24) The operational noise from the development associated within Unit 1 shall **not exceed the levels quoted in Appendix 7.7 "Industrial and Commercial**

Noise Assessment” Environmental Statement Vol 2 – OPP DOC.11.20 – prepared by WSP and dated Dec 2019. Any assessment to determine compliance with the quoted levels shall be made in accordance with the method provided in BS4142:2014 + A1:2019 “Methods for rating as assessing industrial and commercial sound” and shall be carried out by a suitably qualified acoustic consultant/competent person.

- 25) The Operation Noise Management of the site shall be carried out in accordance with the details provided in the document titled " Unit 1, Omega Zone 8, St. Helens, Operational Noise Management Plan, DOC.10 dated July 2020", prepared by WYG on behalf of TJ Morris Ltd - document ref A118153". Any changes to this shall be submitted to and approved in writing by the Local Planning Authority.
- 26) Full details of the acoustic noise barriers identified in Environmental Statement in Chapter 7 (Noise and Vibration) Document No. OPP DOC.11.7 dated Dec 2019 prepared by WSP shall be installed in accordance with a scheme/specification which has been submitted to and agreed in writing with the Local Planning Authority. The agreed scheme shall be implemented before the first use of Unit 1 and retained thereafter. Any timber/acoustic fencing used in the boundary treatment shall be treated to give a minimum design service life of at least 15 years.
- 27) The site access shall be constructed in accordance with the approved site layout plan (ref: 6385-181 G) and drawings (5969-Z8-GA-115 Rev A entitled 'Infrastructure Works Visibility Assessment' and '5969-Z8-GA-100 Rev A entitled 'Infrastructure Works Swept Path Analysis') within Appendix D 'External Works Assessment' to binder course surfacing level prior to occupation of Unit 1. The access shall be kept available for use at all times.
- 28) Within 3 months of occupation a Travel plan shall be submitted to the Local Planning Authority. It shall be approved in writing by the Local Planning Authority. The Travel Plan shall include immediate, continuing, and long-term measures to promote and encourage alternative modes of transport to the single-occupancy car. For the avoidance of doubt, the travel plan shall include but not be limited to:
- **Operational details of a shuttle bus service;**
 - **Involvement of employees;**
 - **Information on existing transport policies, services and facilities, travel behaviour and attitudes;**
 - **Updated information on access by all modes of transport;**
 - **Resource allocation including Travel Plan Co-ordinator and budget;**
 - **A parking management strategy;**
 - **A marketing and communications strategy;**
 - **Promotion of car sharing initiatives;**
 - **Provision of on-site cycle storage;**
 - **An action plan including a timetable for the implementation of each such element of the above;**

-
- Mechanisms for monitoring, reviewing and implementing the Travel Plan; and
 - The details (name, address, telephone number and email address) of the Travel Plan Co-ordinator.

An annual report shall be submitted to the Local Planning Authority no later than 1 month following the anniversary of the first occupation of the development for a period of 5 years. The annual report shall include a review of the Travel Plan measures, monitoring data and an updated action plan.

The approved Travel Plan shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied and in use.

- 29) No construction work relating to the proposed mitigation in Condition (15) above shall commence until the developer has submitted full design & construction details of the required improvements between M62 J8 and Skyline Drive / Fairchild Road roundabout and remarking of M62 exit slip; to the Local Planning Authority and such details have been approved in writing by the Local Planning Authority in consultation with Highways England and shown in preliminary form on drawing 11191042_SK326, including:
- I. How the scheme interfaces with the existing highway alignment, carriageway;
 - II. markings and lane designations;
 - III. Full signing and lighting details;
 - IV. Confirmation of full compliance with current Departmental Standards (DMRB) and Policies (or approved relaxations / departures from standards);
 - V. Independent Stage 1 and Stage 2 Road Safety Audits carried out in accordance with current Departmental (DMRB) and Advice Notes.
- 30) No drainage from the proposed development shall connect into M62 motorway drainage system, nor shall any surface drainage from the site run-off towards the route.
- 31) The internal connected pedestrian/cycle links north to the M62 overbridge of PRow 102 and east to Catalina Approach to the principles of Chetwoods Drawing No.4150-05100-SK15 Indicative Masterplan shall be completed prior to the occupation of Unit 1.
- 32) The development shall be carried out in accordance with the following plans, unless otherwise agreed in writing with the Council as Local Planning Authority:
- Amended Construction Environment Management Plan Unit 1: Doc 7, Omega Zone 8, St Helens /TJ Morris Ltd dated April 2020 prepared by Quod on behalf of TJ Morris Ltd. Received on 13/08/2020; and

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- **Amended INFRA DOC. 1 Construction Environmental Management Plan – INFRA Parts 1 to 4.** Received on 13/08/2020.

For the avoidance of doubt, the measures in the construction management plans include ecological measures which include, but are not limited to, pre-commencement checks, removal and protection of nesting and breeding birds, reptiles, badgers, pond clearance and purple ramping fumitory which shall all be implemented during the course of construction including landscaping. The provision of wheel wash facilities shall also be provided.

- 33) The removal and eradication of invasive species on the full elements of the application site shall be carried out in accordance with the submitted **method statement entitled 'Himalayan Balsam Control Method Statement, The Ecology Practice, 6 July 2020.**
- 34) The bat mitigation measures as set out within page 30 of the **'Environmental Statement Vol.1 Chapter 'Biodiversity' OPP DOC 11.9' and the 'Woodland, Tree and Hedgerow Clearance Method Statement' within Appendix F of Unit 1 Doc 0.7 Construction Environmental Management Plan (Detailed Application Area) (as amended and received on 07/08/2020) and INFRA DOC. 1 Construction Environmental Management Plan, which includes pre-commencement checks and the use of soft felling techniques following best practice at an appropriate time of year, are to be implemented in full during construction and landscaping.**
- 35) Notwithstanding the proposed planting listed in condition 37 the field maple (*Acer campestre*), shall be replaced with hawthorn or holly. *Viburnum opulus* shall be replaced in hedgerow planting with blackthorn and in woodland edge planting it shall be replaced by an increase in other native species listed.
- 36) Prior to the installation of the SUDS attenuation ponds, details of how the SUDS ponds will be designed to benefit nature conservation shall be submitted to and agreed in writing with the Local Planning Authority. The details shall include profile plans and planting plans. Only the approved details shall be implemented.
- 37) All landscaping and tree planting must be in accordance with the specifications and details within the documents: -

Overall

- **OPP DWG. 5 POE_199_001 Rev. H Landscape Strategy**
- **INFRA DWG. 17 POE_199_007 Rev. A Tree Planting Landscape Details**
- **INFRA DWG. 18 POE_199_009 Rev. G Full Landscape Proposals**
- **INFRA DWG. 21 POE_199_010 Rev. D Detailed Application Site Context**

Around Unit 1

- **UNIT 1 DWG. 13a 2138 - PL001-1 Rev. G Preliminary Landscape Proposals (Sheet 1 of 3)**

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- **UNIT 1 DWG. 13b 2138** - PL001-2 Rev. F Preliminary Landscape Proposals Sheet 2 of 3)
 - **UNIT 1 DWG. 13c 2138** - PL001-3 Rev. G Preliminary Landscape Proposals (Sheet 3 of 3)
 - **UNIT 1 DWG. 13d 2138**-PL001-4 Rev A Omega Z8 Sitting area – Preliminary Hard

Landscape Proposals

- **UNIT 1 DWG. 11 6385** – 189 Rev. G Proposed External Finishes Plan
- **UNIT 1 DWG. 12 6385** – 190 Rev. E Dropped Kerb & Tactile Paving

North West Landscaping 'Green Wedge' and cycle path through site

- **INFRA DWG. 14 POE_199_004** Rev. E Structural Landscape-Proposed & Existing Contours
- **INFRA DWG. 15 POE_199_005a** Rev. H Detailed Planting Plan Sheet 1 of 2
- **INFRA DWG. 26 POE_199_005b** Rev. F Detailed Planting Plan Sheet 2 of 2
- **OPP DWG. 6 POE_199_002** Rev. D Indicative Landscape Sections

Boundaries

- **UNIT 1 DWG. 14 6385** – 191 Rev. H Fencing Details

All specified landscaping works shall be completed prior to any use of Unit 1 on site or the first planting season post-occupation (if occupation occurs outside of the planting season). Any trees or plants or grassed areas which, within a period of 5 years from the date of planting, die or are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size, species and quality unless the Local Planning Authority gives written consent to the variation.

- 38) All landscape planting works shall be inspected annually during the month of August, each year for the first 5 years after planting. The inspections shall record the health and condition of trees and plants planted and assess where trees and plants need to be replaced. This report shall be submitted to the Local Planning Authority, prior to the planting season commencing in each year and the details and specifications of replacement trees and plants to be planted in that coming planting season provided in writing. The replacement trees and plants shall then be planted in the period between the 1st December and 1st March and the Local Planning Authority informed when all re-planting works are completed.
- 39) All ongoing landscape management shall be in accordance with the details and specifications within the documents entitled: -

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- Unit 1 Doc.8 Landscape and Ecology Management Plan (LEMP) Unit 1
 - Unit 1 Doc 9a May 2020 Landscape Management Plan Unit 1
 - INFRA DOC. 2 Landscape & Ecology Management Plan – INFRA
 - INFRA DOC. 3b Landscape Management Plan – INFRA also entitled The Landscape maintenance strategy – Omega Zone 8, St Helens, March 2020

submitted with this application and be associated with the landscape drawings submitted in Condition 36 and the requirements of any other conditions. A, review of the delivery of these management plans must be provided to the Local Planning Authority annually for a period of 10 years. The Council should be provided with contact details for the Management Company(s) appointed to implement the approved Management Plans prior to any occupation of Unit 1.

- 40) All tree work shall be to BS3998 (2010) with any woodland, tree and hedgerow removal being in accordance with the details submitted within the following plans;

- Amended Construction Environment Management Plan Unit 1: Doc 7, Omega Zone 8, St Helens /TJ Morris Ltd dated April 2020 prepared by Quod on behalf of TJ Morris Ltd. Received on 13/08/2020
- Amended INFRA DOC. 1 Construction Environmental Management Plan – INFRA Parts 1 to 4. Received on 13/08/2020
- UNIT 1 DWG. 31 131504 Rev. B Head Wall Outfall and Tree Removal Plan
- Method Statement Drainage Outfall Statement Unit 1 Doc.12

submitted with this application, with no felling taking place between the period 1st March to 1st September in accordance with the guidance in these submitted documents.

- 41) Temporary measures to provide physical protection of all trees, hedges and shrubs shown to be retained shall be in accordance with the tree protection plans in the document entitled 'Tree Protection Fencing Document No OPP Doc. 11.22q' submitted with this application:-

- Tree Protection Plan Drg No RSE_3152_TPPa Rev 9;
- Tree Protection Plan Drg No RSE_3152_TPPb Rev 9;
- Tree Protection Plan Drg No RSE_3152_TPPc Rev V9; and
- Drainage Outfall Statement Unit 1 Doc.12

The provision of total exclusion zones must be achieved by the erection of protective fencing as specified in the submitted plans which should not be to a standard less than that specified in British Standard BS5837 (2012). The areas so defined shall be kept free of machinery, stored materials of all

kinds and any form of ground disturbance not specifically catered for in the agreed measures, for the duration of site demolition and building works.

- 42) Arboricultural Supervision and provision of an Ecological Clerk of Works shall be as specified in the following approved documents:

- **Amended Construction Environment Management Plan Unit 1: Doc 7, Omega Zone 8, St Helens /TJ Morris Ltd dated April 2020 prepared by Quod on behalf of TJ Morris Ltd received on 13/08/2020; and**
- **Amended INFRA DOC. 1 Construction Environmental Management Plan – INFRA Parts 1 to 4 received on 13/08/2020**

The Ecological Clerk of Works, Site Biodiversity Champion and Site Biodiversity Manager shall be deployed for the duration of the construction phase on site.

A site meeting between the Site Manager(s), the Ecological Clerk of Works / Site Biodiversity Champion / Site Biodiversity Manager, the St. Helens Trees and Woodlands Officer and the Countryside Development and Woodlands Officer shall take place within 2 weeks of development commencing. The frequency of further meetings, and the reporting procedure to the Local Planning Authority, is to be agreed at the initial site meeting.

- 43) The drainage scheme for Unit 1 shall be implemented, retained and maintained in accordance with the following plans.

- **OPP DOC. 8.1-4 Drainage Strategy Rev. 5**
- **OPP DOC. 1.1 Flood Risk Assessment (Ref No. 70060349-FRA August 2020)**
- **UNIT 1 DWG. 24 131504 Rev. F Surface Water Drainage Layout**
- **UNIT 1 DWG. 25 131504 Rev. E Foul Drainage Layout Rev. D**
- **UNIT 1 DWG. 26 131504 Rev. E Overland Flood Flow (Exceedance) Routing**
- **UNIT 1 DWG. 29 131504-2230 Rev. C Western Pond Sections and Northern and**

Southern Swale Details

- **UNIT 1 DWG. 30 131504-PC-2231 Rev. A Ordinary Watercourse Diversion**
- **UNIT 1 DWG. 31 131504 Rev. B Head Wall Outfall and Tree Removal Plan**
- **UNIT 1 DWG. 32 131504 2110 Rev. B Watercourse Diversion Works**

General Arrangement

- **UNIT 1 DWG. 33 131504 Watercourse Diversion Works Long-sections**
- **OPP DWG. 11 5969-Z8-GA-117 Drainage Maintenance Plan Rev. A**

No further section of Barrow Brook shall be removed than has been shown on the plans. No surface water will be permitted to drain directly or indirectly into the public sewer and any variation to the discharge of foul shall be submitted to and agreed in writing with the Local Planning Authority prior to the commencement of the development.

- 44) No development shall take place within the 8 metre wide buffer zone alongside Whittle Brook watercourse until the Construction Environmental Management Plan and Landscape Environmental Management Plan are updated to include details of maintenance regimes and details of treatment of site boundaries and/or buffers around water bodies. Any subsequent variations shall be agreed in writing by the Local Planning Authority. Only the approved details shall be implemented.
- 45) Within 6 months of works commencing on site, a scheme providing details of management responsibilities for the undeveloped 8m buffer to Whittle Brook, shall be submitted and approved in writing by the Local Planning Authority. Any subsequent variations shall be agreed in writing with the Local Planning Authority, in which case the development shall be carried out in accordance with the amended scheme.
- 46) The development hereby approved shall be implemented in accordance with INFRA DOC. 4 Local Employment Scheme (Construction) and INFRA DOC. 5 Local Suppliers of Services and Goods During the Construction Phase. The Local Planning Authority shall be notified in writing when the local recruitment process begins and the measures taken as identified within the statement.

Conditions for the Outline application

- 47) All applications for reserved matters shall be made within three years of the date of this decision notice and development must be commenced before the expiration of two years from the final approval of the reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approve.
- 48) No development shall take place until details of the following reserved matters relevant to that phase have been submitted to and approved in writing by the Local Planning Authority;
 - a. Appearance
 - b. Landscaping
 - c. Scale and
 - d. Layout

The development shall be carried out in accordance with the reserved matters as approved.

- 49) Reserved matters applications for scale and appearance shall include full details of facing materials. The proposed facing materials shall be selected to minimise the visual bulk of the buildings and their effectiveness shall be demonstrated through a written justification and series of photomontages. The development shall be implemented in accordance with these details.

50) The sites levels shall be constructed in accordance with those shown on plans;

- **OPP DWG. 8 5969-Z8-EWK-100 Rev. B Outline Proposed Levels;** and
- **OPP DWG. 9 5969-Z8-EWK-101 Rev. B Outline Proposed Sections**

Any change in levels shall be shown on existing and proposed plans and submitted and agreed in writing with the Local Planning Authority. Only the approved details shall be implemented.

- 51) A Phasing Plan shall be submitted for approval with all reserved matters applications. The proposed development shall be implemented in accordance with the approved plan.
- 52) Reserved matters applications for layout shall take account of Whittle Brook prior to and after its diversion. Any layout shall demonstrate that there is no development within the 8 metre buffer either side of the bank top.
- 53) The gross external floor space area of any building in use class B8 or B2 (including any ancillary B1a offices) submitted with any reserved matters application shall not be less than 27,870 sq.m (300,000 sq.ft).
- 54) The overall total gross floorspace within the outline application site shall not exceed 123,930 sq.m (1,333,971 sq.ft). Each reserved matters application shall state the ground floor area dimensions and what element will be B8 and/or B2.
- 55) Reserved matters applications shall include a lighting strategy for that phase, which includes details of light columns, lighting specifications, a light spillage plan showing the LUX levels in relation to the closest nearby properties/highways and details of baffles if required. The lighting scheme shall be designed to maintain the amenity of neighbouring residents, ensure highway safety and protect ecology by preventing excessive light spill onto sensitive habitats. The development shall be implemented in accordance with the agreed details.
- 56) No development shall commence on any phase of the development or each reserved matters application until a Construction Environmental Management Plan (CEMP) for that phase/reserved matter has been submitted to and agreed in writing with the Local Planning Authority. The CEMP shall include but not be limited to;

- **Details of phasing;**
- **A dust management plan which includes details of the proposed dust monitoring programme, both before and during construction, with proposed locations and duration of monitoring;**
- **Details of how pre-commencement checks for badgers and water voles will be undertaken;**
- **Method statement for the protection of English Bluebells present within Duck Wood and/or elsewhere on site;**

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- Reasonable Avoidance Measures for protected species including bats and breeding birds;
 - Method statement for the felling of trees;
 - Construction traffic routes, which shall include a primary traffic route;
 - The local and number of parking spaces for contractors;
 - Temporary roads/areas of hard-standing;
 - A schedule for large vehicles delivering/exporting materials to and from site;
 - A scheme of street sweeping/street cleansing;
 - Details of lighting which is designed to minimise impacts on residential amenity and ecology;
 - The identification of a minimum 8 metre; buffer zone from the west and southern boundary from in which no construction activity can take place;
 - A surface water management plan;
 - Contact details of the principal contractor;
 - Confirmation that the principles of Best Practicable Means for the control of noise and vibration will be employed, as defined within the Control of Pollution Act 1975; and
 - Confirmation that the good practice noise mitigation measures detailed within BS528-1: 2009+A1:2014 shall be employed.

The development shall be carried out in accordance with the agreed CEMP.

- 57) Construction work shall not take place outside the hours of 07.00-19.00 hours Monday to Friday, 07.00-14.00 hours Saturday and not at all on Sundays/Public Holidays without the prior written permission of the Local Planning Authority
- 58) No temporary power plant shall be used outside the permitted hours of construction unless in accordance with details which have been submitted to an approved in writing by the Local Planning Authority. Any such plant shall only be operated in accordance with the approved details.
- 59) Reserved Matters applications shall be in accordance with the Environmental Statement (January 2020) and Environmental Statement **Addendum (August 2020), and the following parameter plans and details;”**
- **OPP DWG. 3.1 4150-05105-PL4** Parameters Plan 1 - Outline and Detailed Application Boundaries
 - **OPP DWG. 10 POE_199_011** Parameter Plan 3: Outline Landscape
 - **No building shall exceed the overall height of 19 metres.**
- 60) Prior to the commencement of each phase, or with any reserved matters application submission a Local Employment Scheme for the construction of that phase shall be submitted to and agreed in writing with the Local Planning Authority. The submitted Local Employment Scheme shall demonstrate how the development will use all reasonable endeavours to

recruit at least 20% of labour from within the Borough of St Helens focusing on the most deprived Super Output Areas. The Scheme shall include the following:

- a) Details of how the initial staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies such as St Helens Chamber and Ways to Work 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 commitment that the construction phase of the development will be undertaken in accordance with the Unite Construction Charter;
- g) A procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to St Helens Borough Council including details of the origins qualifications numbers and other details of candidates; and
- h) A timetable for the implementation of the Local Employment Scheme.

The development shall be implemented in accordance with the approved scheme.

- 61) No development shall take place in a phase until a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance and LLFA Guidance, and with evidence of an assessment of the site conditions, has been submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) and LLFA Guidance. This will include the need for a full drainage strategy, flood modelling and detailed construction level drawings for all surface water aspects, in line with the Drainage strategy (OPP DOC. 8.1 Drainage Strategy Rev. 5) supplied in application P/2020/0061/HYBR. The agreed scheme shall be implemented before the first use of any building hereby permitted in that phase and managed/maintained as agreed thereafter.

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- 62) No development shall take place until a scheme for the provision and management of an 8 metre wide buffer zone alongside the Whittle Brook watercourse has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter, the development shall be carried out in accordance with the approved scheme. The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping. The scheme shall include:
- a) plans showing the extent and layout of the buffer zone; .
 - b) details of any proposed planting scheme (for example, native species); and
 - c) details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plans.

Any subsequent variations shall be agreed in writing by the Local Planning Authority, in which case the development shall be carried out in accordance with the amended scheme.

- 63) No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas, has been submitted to, and approved in writing by, the Local Planning Authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

The scheme shall include the following elements:

- **details of maintenance regimes;**
 - **details of any new habitat created on-site;**
 - **details of treatment of site boundaries and/or buffers around water bodies;**
 - **details of management responsibilities;**
 - **Whittle Brook channel long section showing existing and proposed bed levels** (this should indicate change in channel length and associated gradient. Any change should be assessed with regard to hydromorphology and biological quality elements in the WFD assessment);
 - **Indicative channel cross-sections** to represent all design proposals (i.e. 2-stage channel, inset berms and any changes at proposed meanders); and
 - **Geomorphology surveys to inform detailed design proposal to be provided** to the Environment Agency, including data on the reference reach.
- 64) Prior to the commencement of each phase of the development, or reserved matters application a Scheme to promote the use of local suppliers of goods and services during the construction of that phase shall be submitted to

and agreed in writing with the Local Planning Authority. The development shall be implemented in accordance with the agreed Scheme.

- 65) Prior to the commencement of development on each phase, or with the submission of a reserved matters application the developer shall submit a Piling Method Statement, to be approved by the Local Planning Authority. The piling work shall be undertaken in accordance with the approved method statement: The method statement shall include the following details:
- **Details of the method of piling;**
 - **Days / hours of work;**
 - **Duration of the pile driving operations (expected starting date and completion date);**
 - **Prior notification to the occupiers of potentially affected properties; and**
 - **Details of the responsible person** (e.g. site manager / office) who could be contacted in the event of complaint.
- 66) Prior to the commencement of any B2 use hereby permitted on any individual plot, the operator shall submit a scheme to the LPA detailing any sources of vibration which may be detectable at other nearby premises. The scheme shall detail any mitigation measures proposed to minimise such vibration to levels that will not cause alarm or distress at neighbouring premises in accordance with British Standards. Once approved in writing by the Local Planning Authority, all agreed mitigation measures shall be implemented prior to the commencement of use.
- 67) Prior to the first use of any building, a Local Employment Scheme for the operational phase of that building shall be submitted to, and approved in writing by, the Local Planning Authority. The submitted Local Employment Scheme shall demonstrate how the development will use all reasonable endeavours to recruit at least 20% of labour from within the Borough of St Helens, focusing on the most deprived Super Output Areas. The Scheme shall include the following:
- a) Details of how the initial staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies such as St Helens Chamber and Ways to Work, 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;
 - 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) A procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the St Helens Borough Council including details of the origins qualifications numbers and other details of candidates; and

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

The development shall be implemented in accordance with the approved Scheme.

- 68) Prior to the commencement of development within zone 4 as shown on plan ref: LA100018360 2020, a Phase 2 site investigation and assessment shall be undertaken in accordance with the recommendations of the submitted Phase 1 Geo-environmental Assessment (WSP, ref 11158(002), May 2019). The results of the site investigation and assessment shall be submitted to and agreed in writing with the Local Planning Authority.

Should the Phase 2 investigation identify any requirements for remediation then a remedial strategy, including a validation methodology, shall be submitted to and agreed in writing with the Local Planning Authority. The remedial strategy shall include a methodology and verification plan for the decommissioning of any deep boreholes.

All such reports shall be completed by a competent person in accordance with government and Environment Agency guidance, namely "Land Contamination: Risk Management" (<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>).

- 69) Prior to occupation/ commencement of use of any phase of the development within zone 4 as shown on plan ref: LA100018360 2020, the agreed remedial strategy (if required) will have been implemented, and a site validation/ completion report for each building within that phase shall be submitted to and approved in writing by the Local Planning Authority.

For the avoidance of doubt, the site validation/ completion report shall include, but will not necessarily be limited to:

- i) full details of all remediation works undertaken;
- ii) validation (in accordance with the validation methodology detailed within the agreed remedial strategy) of the adequacy of the remediation;
- iii) sampling, testing and assessment of the suitability of any imported or site won soils;
- iv) the fate of any excavated material removed from site; and
- v) verification of the successful decommissioning of boreholes.

The site validation/ completion report(s) shall be completed by a competent person in accordance with government and Environment Agency guidance,

namely "Land Contamination: Risk Management"

(<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>).

- 70) Prior to the first use of each phase or reserved matters, the unit hereby approved, an Operational Noise Management Strategy for each individual unit shall be submitted to and agreed in writing with the Local Planning Authority. The agreed Strategy shall be implemented thereafter.
- 71) Prior to the occupation of any unit, a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to and agreed in writing with the Local Planning Authority. The sustainable drainage management and maintenance plan shall include as a minimum:
- identification of the responsible/adopting authority / undertaker / management company; and
 - the inspection and ongoing maintenance regime throughout its lifetime.

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

- 72) Any reserved matters application shall include an up-to-date Arboricultural Impact Assessment, with Tree Constraints Plan and Tree Protection Plan with the temporary measures to provide physical protection of all trees, hedges and shrubs shown to be retained (which shall retain, as a minimum **the areas illustrated as "Existing Woodland / Trees / Vegetation to be retained and protected" in the plan entitled "Parameters Plan 3 Outline Landscape (OPP Planning) Drawing No. POE_199_011" submitted with this application**). This information must detail tree protection measures which will be put in place to not only protect the existing retained trees, hedges and woodlands but also any new tree planting and landscaping delivered as part of any development on site.

All tree protection measures shall be to at least BS 5837 (2012) standard. Method statements shall also be included, particularly where there are impacts to root **protection areas and ground protection or special 'no dig'** surfacing is required. All measures shall be in place prior to any demolition or development taking place on site. The provision of total exclusion zones so defined shall be kept free of machinery, stored materials of all kinds and any form of ground disturbance not specifically catered for in the agreed measures, for the duration of all site and building works (including works that may be carried out within the adjacent outline area of the site).

- 73) Any reserved matters application shall include an Arborist Clerk of Works Method Statement and Ecological Clerk Works Method Statement. These Statements must include details of the Site Biodiversity Champion. All tree work and hedgerow removal specified in these documents shall be to BS3998 (2010), with no felling taking place between the period 1st March to 31st August, unless otherwise clearly specified methodologies for arboricultural and ecological supervision and inspection aimed at avoiding

disturbance to breeding birds and protected species are detailed within these documents.

All tree work must be supervised by the Arboricultural Supervisor for the site. The contact details for the Arboricultural Supervisor / Ecological Clerk of Works and Site Biodiversity Champion, along with the dates of an initial site meeting between Site Managers, Site Biodiversity Champion, the St. Helens Trees and Woodlands Officer and the Countryside Development and Woodlands Officer shall be provided prior to commencement of development. The frequency of further meetings, and the reporting procedure to the Local Planning Authority, is to be agreed at the initial site meeting.

- 74) Any reserved matters application for landscaping shall provide fully specified landscape plans. All plans shall be in accordance with the species recommendations, principles and standards detailed in the document **"Omega Zone 8: Landscape Strategy December 2019 (Rev C 05.08.20), "Landscape Strategy : Omega Zone 8 (OPP Dwg 5) Drawing No. POE_199_001 Dated 12/19 Revision H and the "Parameters Plan 3 Outline Landscape (OPP Planning) Drawing No. POE_199_011 Dated 04/20 Revision A", OPP DWG. 12 5969-Z8-SK-015 Rev. D Parameter Plan 4: Watercourse Diversion and OPP DWG.13 5969-Z8-SK-09 Rev. D Watercourses Diversion Route and Sections, submitted with this application.**

In addition, all plans shall provide the following supporting information: -

- detailed designs and planting specifications, including cross sections, for all water bodies, including river diversions, being created on site;
- the removal of rhododendron and under planting of existing retained woodlands using appropriate native woodland species;
- **specifications for all other soft and hard landscape details for 'ecological' areas as well as within the developed areas of the site;**
- the design and specification of any paths and tracks to be constructed, which shall provide a route that is surfaced and at least 1.5 metres in width, preferably using a bound recycled stone surface e.g Hoppath and **incorporate "Access for All" principles e.g. maximum gradients of 1 in 20 (1:12 for short sections);**
- a timescale for the delivery of landscaping, which must be completed prior to use of the development unless otherwise first agreed in writing with the Local Planning Authority; and a detailed maintenance programme and schedule for all landscaping completed on site.

All specified landscaping works shall be completed prior to any use of any buildings on site or the first planting season post-occupation (if occupation occurs outside of the planting season) unless otherwise first agreed in writing with the Local Planning Authority. Any trees, shrubs and plants and meadow areas planted / sown, which within a period of 5 years from the date of planting / sowing die, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size, species and quality unless the Local Planning Authority gives written consent to the variation.

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- 75) All landscape planting works shall be inspected annually during the month of August, each year for the first 5 years after planting. The inspections shall record the health and condition of trees and plants planted and assess where trees and plants need to be replaced. This report shall be submitted to the Local Planning Authority, prior to the planting season commencing in each year and the details and specifications of replacement trees and plants to be planted in that coming planting season provided in writing. The replacement trees and plants shall then be planted in the period between the 1 December and 1 March and the Local Planning Authority informed when all re-planting works are completed.
- 76) Any reserved matters application shall include a detailed Ecological and Landscape Management Plans updated for areas that are illustrated as **being retained and created in the plan entitled ""Parameters Plan 3 Outline Landscape (OPP Planning) Drawing No. POE_199_011"" submitted with this application and separately for the developed areas within the rest of the site. The plans shall: -**

- **Include detailed maintenance and management schedules / programmes** for the landscape areas illustrated as being retained and created within the **"Parameters Plan 3 Outline Landscape (OPP Planning) Drawing No. POE_199_011"** submitted with this application.

- **Use the principles identified within the documents "Omega Zone 8: Landscape Strategy December 2019 (Rev C 05.08.20) and Omega Zone 8: Landscape Maintenance Strategy March 2020 Rev D Issued 05.08.20.**

- **Include the management of ponds, wetlands and rivers / streams being created on site.**

- **Provide methodologies for the control of invasive species such as Himalayan balsam and rhododendron.**

- **Provide details of nest box specification and locations for bird and bat species on site, which shall include provision of barn owl boxes.**

Progress, review and delivery of the management plans must be provided to the Local Planning Authority annually. The Council should be provided with contact details for the Management Company(s) appointed to implement these management plans prior to any use of any buildings onsite. Only the approved details shall be implemented.

- 77) The removal and eradication of invasive species on the outline elements of the application site, as identified on plan ref: 4150-05105-PL4 shall be carried out in accordance with the submitted method statement entitled *'Himalayan Balsam Control Method Statement, The Ecology Practice, 6 July 2020.*
- 78) Reserved matters applications shall be supported by updated bat surveys.

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- 79) The bat mitigation measures as set out within page 30 of the 'Environmental Statement Vol.1 Chapter 'Biodiversity' OPP DOC 11.9' and the 'Woodland, Tree and hedgerow clearance method statement' within Appendix F of Unit 1 Doc 0.7 Construction Environmental Management Plan (Detailed Application Area) (as amended and received on 07/08/2020), which includes pre-commencement checks and the use of soft felling techniques following best practice at an appropriate time of year, are to be implemented in full.
- 80) Notwithstanding 'INFRA DWG. 12 16903-11ES Rev. C Bat Box Proposals'; reserved matters applications shall provide details of bat boxes within the boundary of the outline element of this application (as shown on plan ref: 4150-05105-PL4). The details shall be submitted to and approved in writing by the Local Planning Authority. For the avoidance of doubt the details shall be shown on a scaled plan and include the quantity, type, location and timing of installation. The approved details shall be implemented.
- 81) Should two years elapse from the date of the water vole survey (*Amended Appendix 9.13 Water Vole survey, dated June 2020*), submitted with the application then updated water vole surveys will be required to be carried out for any reserved matters application and the details and findings submitted to and agreed in writing with the Local Planning Authority.
- 82) No grassland clearance or tree or hedgerow felling, lopping or pruning shall take place between 1st March and 31st August, unless a survey for breeding birds together with a scheme of necessary mitigation and protection measures, undertaken by a suitably qualified person, has been submitted to and approved in writing by the Local Planning Authority. Should grassland clearance, tree or hedgerow felling, lopping or pruning take place between the dates stated above, any agreed mitigation and protection measures shall be implemented and retained throughout the period.
- 83) Prior to the installation of the SUDS attenuation ponds, details of how the SUDS ponds will be designed to benefit nature conservation shall be submitted to and agreed in writing with the Local Planning Authority. The details shall include profile plans and planting plans. Only the approved details shall be implemented.
- 84) Notwithstanding the requirements of Conditions 62 and 63, the development shall be carried out in accordance with the submitted Flood Risk Assessment (ref: August 2020/70060349-FRA/WSP) and the following mitigation measures it details:
- **Diversion of Whittle Brook design to include increased** capacity within the watercourse to reduce the flood risk currently affecting the proposed development site;
 - **Surface water discharge from the site to be limited to 5.8 l/s/ha** with 15,495 cubic metres of attenuation provided to cater up to the 100-year climate change rainfall event affecting the site; and
 - **Raised finished floor levels** - 0.3m above the 100-year climate change level for the on-site drainage system & 0.15m above proposed surrounding ground level.

These mitigation measures shall be fully implemented prior to occupation **and subsequently in accordance with the scheme's timing/ phasing** arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

- 85) Access into the site shall be delivered in accordance with the general arrangements shown on Plan UNIT 1 DWG. 1 6385 – 181 Rev. G Proposed Site Layout Plan and shall be provided prior to the first use of any building hereby permitted.
- 86) The roads shall be maintained in accordance with the management and maintenance details outlined in Infra Doc.6 Highways Management & Maintenance of Omega Roadways Document (July 2020) until such times as a private management and maintenance company has been established or until such time as an agreement has been entered into under the Highways Act 1980.
- 87) The development shall provide internal connected pedestrian/cycle links north to the M62 overbridge of PRoW 102, east to Catalina Approach and east to Omega Boulevard/Orion Boulevard to the principles of Chetwoods Drawing No.4150-05100-SK15 Indicative Masterplan. The Omega Boulevard/Orion Boulevard link (which is intended to double as an emergency access route) shall be operational prior to the opening of the first unit within the outline area of the site unless otherwise agreed in writing with the Local Planning Authority.
- 88) Within 6 months of a building being occupied, a Travel Plan for that building shall be submitted to and approved in writing by the Council as Local Planning Authority. The plan shall include immediate, continuing and long-term measures to promote and encourage alternative modes of transport to the single-occupancy car. For the avoidance of doubt, the Travel Plan shall include but not be limited to:

- **Operational details of a shuttle bus service;**
- **Involvement of employees;**
- **Information on existing transport policies, services and facilities, travel behaviour and attitudes;**
- **Updated information on access by all modes of transport;**
- **Resource allocation including Travel Plan Co-ordinator and budget;**
- **A parking management strategy;**
- **A marketing and communications strategy;**
- **An action plan including a timetable for the implementation of each such element of the above; and**
- **Mechanisms for monitoring, reviewing and implementing the Travel Plan.**

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- 89) The approved Travel Plan shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied and in use. An annual report shall be submitted to the Local Planning Authority no later than 1 month following the anniversary of the first occupation of the development for a period of 5 years. The annual report shall include a review of the Travel Plan measures, monitoring data and an updated action plan.
- 90) Reserved Matters applications shall include precise details of car, motorbike and cycle parking. The details shall include a justification for the level of spaces proposed, a layout plan, details of surfacing and any facilities such as lockers, showers etc. The parking provision should include 1 priority parking space (each equipped with 1 electric vehicle charge point) per 30 parking spaces. These spaces shall be provided prior to the first use of the building approved under that reserved matters application and retained as such thereafter.
- 91) Reserved matters applications shall include provision for overnight lorry accommodation and shall include evidence to demonstrate that the level of provision is adequate for that phase of the development. The development shall be implemented in accordance with the agreed details and those areas shall be retained as such thereafter.
- 92) No additional external plant or equipment shall be permitted nor shall any additional openings be formed in the elevations or roof of the units hereby permitted which directly ventilate the building or which discharge from any internal plant or equipment, without the prior written permission of the Local Planning Authority. Only the approved details shall be implemented.
- 93) The rating level of noise emitted from the fixed plant and equipment serving units shall not exceed those quoted in Table 7.7-4 **"Fixed plant and equipment noise limits"** of **Appendix 7.7 Industrial/Commercial Noise Assessment - Environmental Statement Vol 2 – OPP DOC. 11.20** carried out by WSP dated Dec 2019 at the specific receptors identified . Any assessment to determine compliance with the quoted levels shall be made in accordance with the method provided in BS4142:2014 + A1:2019 **"Methods for rating as assessing industrial and commercial sound"** and shall be carried out by a suitably qualified acoustic consultant/competent person.
- 94) Operational noise from the development shall not exceed the levels quoted in **Appendix 7.7 "Industrial and Commercial Noise Assessment"** Environmental Statement Vol 2 – OPP DOC.11.20 – carried out by WSP dated Dec 2019. Any assessment to determine compliance with the quoted levels shall be made in accordance with the method provided in **BS4142:2014 + A1:2019 "Methods for rating as assessing industrial and commercial sound"** and shall be carried out by a suitably qualified acoustic consultant/competent person.
- 95) As part of any phase or reserved matters application an updated Noise and Vibration Assessment shall be submitted which builds on the findings of those presented in Environmental Statement in Chapter 7 (Noise and Vibration) Document No. OPP DOC.11.7 dated Dec 2019. The updated assessment shall seek to minimise noise emanating from the development and detail any mitigation required.

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- 96) All floor floating operations shall be undertaken using best practicable means to reduce the impact of noise and vibration on neighbouring sensitive properties. In addition, prior to the commencement of any floor floating activities, the developer shall submit a written method statement, to be approved by the Local Planning Authority prior to the commencement of floor floating activities. The floor floating work shall be undertaken in accordance with the approved method statement:

The method statement shall include the following details:

- **Details of the method of floor floating;**
 - **Days / hours of work;**
 - **Duration of the floor floating operations (expected starting date and completion date);**
 - **Prior notification to the occupiers of potentially affected properties; and**
 - **Details of the responsible person (e.g. site manager / office) who could be contacted in the event of complaint**
- 97) As part of any reserved matters application, full details of the acoustic noise barriers for any units shall be submitted to and agreed in writing with the Local Planning Authority. It should be based on the details identified in the Environmental Statement in Chapter 7 (Noise and Vibration) Document No. OPP DOC.11.7 dated Dec 2019 carried out by WSP. The barriers shall be installed in accordance with a scheme/specification which has been submitted to and agreed in writing with the Local Planning Authority. The agreed scheme shall be implemented before the first use of the relevant unit and retained thereafter. Any timber/acoustic fencing used in the boundary treatment shall be treated to give a minimum design service life of at least 15 years.
- 98) As part of any reserved matters submission, notwithstanding the layout may change, chilled goods shall be prohibited within the dashed orange area as shown on plan ref: Omega 7.7 Residual Noise Contour/Chilled Goods Operation plan ref: UK RA B600 dated 19/12/2019.

END OF CONDITIONS



Department for Levelling Up, Housing & Communities

www.gov.uk/dluhc

RIGHT TO CHALLENGE THE DECISION IN THE HIGH COURT

These notes are provided for guidance only and apply only to challenges under the legislation specified. If you require further advice on making any High Court challenge, or making an application for Judicial Review, you should consult a solicitor or other advisor or contact the Crown Office at the Royal Courts of Justice, Queens Bench Division, Strand, London, WC2 2LL (0207 947 6000).

The attached decision is final unless it is successfully challenged in the Courts. The Secretary of State cannot amend or interpret the decision. It may be redetermined by the Secretary of State only if the decision is quashed by the Courts. However, if it is redetermined, it does not necessarily follow that the original decision will be reversed.

SECTION 1: PLANNING APPEALS AND CALLED-IN PLANNING APPLICATIONS

The decision may be challenged by making an application for permission to the High Court under section 288 of the Town and Country Planning Act 1990 (the TCP Act).

Challenges under Section 288 of the TCP Act

With the permission of the High Court under section 288 of the TCP Act, decisions on called-in applications under section 77 of the TCP Act (planning), appeals under section 78 (planning) may be challenged. Any person aggrieved by the decision may question the validity of the decision on the grounds that it is not within the powers of the Act or that any of the relevant requirements have not been complied with in relation to the decision. An application for leave under this section must be made within six weeks from the day after the date of the decision.

SECTION 2: ENFORCEMENT APPEALS

Challenges under Section 289 of the TCP Act

Decisions on recovered enforcement appeals under all grounds can be challenged under section 289 of the TCP Act. To challenge the enforcement decision, permission must first be obtained from the Court. If the Court does not consider that there is an arguable case, it may refuse permission. Application for leave to make a challenge must be received by the Administrative Court within 28 days of the decision, unless the Court extends this period.

SECTION 3: AWARDS OF COSTS

A challenge to the decision on an application for an award of costs which is connected with a decision under section 77 or 78 of the TCP Act can be made under section 288 of the TCP Act if permission of the High Court is granted.

SECTION 4: INSPECTION OF DOCUMENTS

Where an inquiry or hearing has been held any person who is entitled to be notified of the decision has a statutory right to view the documents, photographs and plans listed in the appendix to the Inspector's report of the inquiry or hearing within 6 weeks of the day after the date of the decision. If you are such a person and you wish to view the documents you should get in touch with the office at the address from which the decision was issued, as shown on the letterhead on the decision letter, quoting the reference number and stating the day and time you wish to visit. At least 3 days notice should be given, if possible.

Appendix 6 – Programme for Delivery for the Development of the site at Junction 21 of the M6



ST. MODWEN PARK JUNCTION 21, M6 PROPOSED DELIVERY PROGRAMME REV C

