

**LAND AT BRADLEY HALL FARM, GRAPPENHALL LANE,  
GRAPPENHALL, WARRINGTON**

**APPEAL REF: APP/M0655/V/22/3311877**

**CORE DOCUMENTS**

**NOTE THE SECTIONS REFERENCED DR03 – DR08 RELATE TO  
DOCUMENTS IN THOSE NUMBERED APPENDICES OF DAVID  
ROLINSON**

CD Ref	Document Title
<b>National Planning Policy and Guidance</b>	
1.1	National Planning Policy Framework 2021
1.2	National Planning Practice Guidance – Natural Environment – Biodiversity, geodiversity and ecosystems – paragraphs 009 – 035
<b>Development Plan</b>	
2.1	Warrington Local Plan Core Strategy
2.2	Warrington Core Strategy Local Plan Proposals Map – link to website: <a href="#">Cadcorp SIS WebMap 9 - Planning and LLC External (warrington.gov.uk)</a>

CD Ref	Document Title
2.3	Appleton Thorn Neighbourhood Plan
<b>Other Planning Documents</b>	
3.1	<p>Warrington Updated Proposed Submission Version Local Plan 2021-2038 (placed with SoS April 2022)</p> <ul style="list-style-type: none"> <li>• DC3 Green Infrastructure page 118-124</li> <li>• DC4 Ecological Network page 124-130</li> <li>• ENV8 Environmental and Amenity Protection page 175-180 <ul style="list-style-type: none"> <li>○ ENV8.4 Air Quality Manchester Mosses SAC page 175</li> </ul> </li> <li>• MD6 The South East Warrington Employment Area page 223-227</li> </ul> <p><u>MD6.3</u> Detailed site-specific Requirements – Natural Environment page 224</p>
3.2	Local Plan Inspector's Interim Letter dated 16 December 2022
<b>Planning Application Documents</b>	
<b>Environmental Statement</b>	
<b>Environmental Statement Part 1</b>	
4.1	Second Addendum to ES Part 1 Revision D 15th November 2021

CD Ref	Document Title
<b>Environmental Statement Part 2 – Technical papers</b>	
4.2	1 Ground Conditions and Contamination inc. Appendices (including Ground Investigation Reports)
4.3	2 Addendum Technical Paper 2 – Traffic and Transportation inc. Appendices containing Transport Assessment and Travel Plan
4.4	3 Addendum Technical Paper 3 – Drainage and Flood Risk inc. Appendices containing Flood Risk Assessment (FRA) and Drainage Strategy
4.5	4 Second Addendum Technical Paper 4 – Landscape and Visual Impact inc. Appendices containing Arboriculture Survey and Impact Assessment
4.6	5 Addendum Technical Paper 5 – Ecology and Nature Conservation inc. Appendices (Including Version with and without the Badger Appendix due to Confidentiality and all other Surveys)
4.7	6 Addendum Technical Paper 6 – Socio-Economic
4.8	7 Addendum Technical Paper 7 – Noise inc. Appendices
4.9	8 Air Quality inc. Appendices
4.10	9 Addendum Technical Paper 9 – Cultural Heritage and Archaeology Revision Iv 28th October 2021 inc.

CD Ref	Document Title
	Appendices containing Archaeological Geophysical Survey Report
4.11	10 Utilities inc. Appendices
4.12	11 Waste inc. Appendices
4.13	12 Energy
4.14	13 Agricultural Land and Soils inc. Appendices containing Agricultural Land Classification Survey
<b>Non-Technical Summary</b>	
4.15	Second Addendum to ES Non-Technical Summary Rec C 14 November 2021
<b>Plans Referred to in Draft Planning Conditions</b>	
<b>Parameters Plans (draft planning condition 4) (also referred to in Appendix 5 to ES Part 1 Second Addendum)</b>	
4.16	16-184 P110 Rev G Development Cells Parameters Plan
4.17	16-184 P116 Rev I Disposition Parameters Plan
4.18	16-184 P111 Rev I Green Infrastructure Parameters Plan
4.19	16-184 P115 Rev H Heights Parameters Plan
4.20	16-184 P113 Rev G Access and Circulation Parameters Plan
4.21	16-184 P117 Rev H Drainage Parameters Plan
4.22	16-184 P114 Rev L Acoustic Considerations Parameters

CD Ref	Document Title
4.23	16-184 P112 Rev G Heritage Parameters
4.24	16-184 P118 Rev F Demolition Parameters Plan
<b>Highway Plans (draft planning condition 28)</b>	
4.25	Potential Western Access Roundabout Drawing Ref: 64076-CUR-00-XX-DR-TP-75002-P02
4.26	Potential Eastern Access Roundabout Drawing Ref: 64076-CUR-00-XX-DR-TP-75001-P03
4.27	Cliff Lane Roundabout Proposed Improvements (swept paths) Drawing Ref: 64076-CUR-00-XX-DR-TP-5002-P02
4.28	Cliff Lane Roundabout Proposed Improvements Drawing No. 64076-CUR-00-XX-DR-TP-75011-P06
4.29	Pedestrian and Cycle Improvements Drawing Ref: 64076-CUR-00-XX-DR-TP-75014-P02
<b>Bund Site Section to show Noise Mitigation (draft planning condition 23)</b>	
4.30	Bund Sections to show Noise Mitigation 01 Drawing No. 133-LYR-XX-XX-DWG-L-5002 Rev 2
4.31	Bund Sections to show Noise Mitigation 01 Drawing No. 133-LYR-XX-XX-DWG-L-5003 Rev 1
4.32	Bund Sections to show Noise Mitigation 01 Drawing No. 133-LYR-XX-XX-DWG-L-5004 Rev 1
<b>Other Documents</b>	
4.33	Application forms (Warrington Borough Council and Cheshire East)

<b>CD Ref</b>	<b>Document Title</b>
4.34	Replacement Planning Statement Rev C October 2021
4.35	Consultation Report
4.36	Design and Access Statement
4.37	Applicant's response to Ramboll re. Landscaping dated 20th August 2019 and 18 <sup>th</sup> November 2021
4.38	ES Addendum covering letter
4.39	Biodiversity Net Gain Summary Ref: 10682_R04b
4.40	Whole Life Carbon Assessment Doc. Ref: 1015524-RPT-SY-001
4.41	Second addendum covering letter
4.42	Second addendum covering letter
<b>Illustrative Plans</b>	
4.43	Illustrative sections rev 8 November 2021
4.44	Illustrative masterplan rev AG
<b>Noise</b>	
4.45	Design Manual for Roads and Bridges – LA 111 – Noise and vibration – Revision 2
4.46	Code of practice for noise and vibration control on construction and open sites – Part 1 : Noise

CD Ref	Document Title
4.47	BSI Standards Publication - Methods for rating and assessing industrial and commercial sound
4.48	International Standard ISO 9613-2 – Acoustics – Attenuation of sound during propagation outdoors – Part 2: General method of calculation
<b>Landscape</b>	
4.49	National Character Assessment 60 Mersey Valley
4.50	National Character Assessment 61 Shropshire Cheshire and Staffordshire Plain
4.51	Warrington – A Landscape Character Assessment
4.52	Cheshire East Landscape Character Assessment
4.53	Cheshire East Landscape Character Assessment Appendices
4.54	Warrington Borough Council – Implication of Green Belt Release – August 2021
4.55	Guidelines for Landscape and Visual Assessment 3 – Landscape Institute
<b>Heritage</b>	
4.56	Chartered Institute for Archaeologists, 2020 Standard and Guidance for Archaeological Geophysical Survey
4.57	Chartered Institute for Archaeologists, 2020 Standard and Guidance for Historic Desk-Based Assessment

CD Ref	Document Title
4.58	Historic England, 2008 Conservation Principles Policy and Guidance
4.59	Historic England, 2017 (2 <sup>nd</sup> ed) The Setting of Heritage Assets – Historic Environment Good Practice Guide in Planning Note 3
4.60	Historic England, 2019 Advice Note 12, Statements of Historic Significance, Analysing Significance in Heritage Asset (HEAN12)
<b>Transport</b>	
4.61	Decision Notice for Land at Barleycastle Lane APP/M0655/V/20/3253083
4.62	Warrington Fourth Local Transport Plan
4.63	Curtins Travel Plan June 2020
4.64	National Highways Consultation Response 1 12 August 2019
4.65	WBC Consultation Response 1 15 August 2019
4.66	Curtins Post Submission Response 1 to WBC 12 September 2019
4.67	Curtins Post Submission Response 1 to NH 12 September 2019
4.68	National Highways Consultation Response 2 16 October 2019



<b>CD Ref</b>	<b>Document Title</b>
4.69	National Highways Consultation Response 3 20 December 2019
4.70	Curtins Post Submission Response 1 to NH 14 November 2019
4.71	Curtins Post Submission Response 1 to NH 21 January 2020
4.72	National Highways Consultation Response 18 March 2020 (No Objection)
4.73	National Highways Consultation Response 5 15 February 221 (No Objection)
4.74	WBC Consultation Response 2 19 May 2021 (No Objection)
<b>Air Quality</b>	
4.75	Department for Environment Food and Rural Affairs (Defra), Clean Air Strategy 2019
4.76	Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) 'Land Use Planning and Development Control: Planning for Air Quality' (EPUK & IAQM, 2017)
4.77	Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction', v1.1 (IAQM, 2016)

CD Ref	Document Title
4.78	Local Air Quality Management (LAQM) Policy Guidance (PG22). (LAQM.PG(22)) (Department for Environment Food and Rural Affairs (Defra), 2022)
4.79	Local Air Quality Management (LAQM) Technical Guidance (TG22). (LAQM.TG(22)) (Department for Environment Food and Rural Affairs (Defra), 2022).
4.80	Warrington Borough Council Air Quality Annual Status Report 2022
<b>Ecology</b>	
4.81	Environment Act 2021 – Schedule 14
4.82	Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide. (CIEEM, IEMA & CIRIA, 2019)
4.83	<p>BNG Consultation Outcome. Government response and summary of responses (DEFRA 21.02.23)</p> <p>Section 4 Government response part 2: Applying the biodiversity gain objective to different types of development</p> <ul style="list-style-type: none"> <li>4.1 Phased development and development subject to subsequent applications</li> </ul> <p>Section 5 Government response part 3: How the mandatory BNG requirement will work for Town and Country Planning Act 1990 development</p> <ul style="list-style-type: none"> <li>5.1 Biodiversity gain plan</li> </ul>

CD Ref	Document Title
	<ul style="list-style-type: none"> <li>5.6 Additionality</li> </ul> <p>5.8 Reporting, evaluation and monitoring</p>
4.84	<p>Warrington Borough Council Updated Proposed Submission Version Local Plan – Updated Habitat Regulations Assessment (August 2021)</p> <ul style="list-style-type: none"> <li>Air Quality page 61-69 <ul style="list-style-type: none"> <li>Manchester Mosses SAC paragraphs 4.46-4.65</li> </ul> </li> </ul>
4.85	<p>Air Quality Assessment for Warrington Local Plan Habitats Regulations Assessment – Further Modelling of Manchester Mosses SAC (November 2022)</p> <p>Section 5 Preferred Mitigation Strategy page 32-33</p>
4.86	<p>Mersey Gateway Environmental Trust – UMS proposal for Tyler Grange</p>
4.87	<p>Birds of Conservation Concern, 2021</p>
<b>Employment Land Demand</b>	
4.88	<p>Delivering the Goods in 2020</p>
4.89	<p>What Warehousing Where 2018</p>
4.90	<p>Economic Contribution of Logistics in the Northern Powerhouse</p>
<b>Planning</b>	
4.91	<p>Judgment CO/774/2015 EWHC 2489 (Admin) (2015)</p>

CD Ref	Document Title
4.92	PAS Good Plan Making Guide (2014)
4.93	WBC Economic Development Needs Assessment (EDNA) – August 2021
4.94	WBC Draft Local Plan Green Belt Review – GB1 – Garden Suburb Options
4.95	WBC Draft Local Plan Green Belt Review – GB3 – Implications of Green Belt Release
4.96	Examiner's Report (October 2016) – Appleton Thorn Neighbourhood Development Plan
4.97	Warrington Sustainability Appraisal (August 2021)
4.98	Warrington Green Belt Assessment October 2016
4.99	Warrington Green Belt Assessment September 2021
4.100	Warrington Green Belt Assessment July 2017
4.101	Alternative Sites Assessment Rev B (March 2018)
<b>DR03 – Policy Imperative</b>	
4.102	Government's "The Build Back Better – Our Plan for Growth" (2021)
4.103	Invest Liverpool City Region – link to website - <a href="https://investliverpoolcityregion.com">https://investliverpoolcityregion.com</a>

CD Ref	Document Title
4.104	Industrial Strategy – Building a Britain fit for the future (November 2017)
4.105	Transport for the North – Freight and Logistics Strategy (2022)
4.106	The Northern Powerhouse One Agenda, One Economy, One North (2015)
4.107	Knight Frank Logistics Market Outlook 2022
4.108	The Atlantic Gateway Strategic Plan 2018
4.109	Cheshire and Warrington Local Enterprise Partnership (LEP) Delivery Plan 2022/2023
4.110	The Northern Powerhouse Strategy (November 2016)
4.111	Department for Transport's Written Ministerial Statement with the Department for Levelling Up, Housing and Communities (2021)
4.112	Levelling Up the United Kingdom 2022
4.113	Future of Freight: a long-term plan (2022)
4.114	The Economic Contribution of Logistics in the Northern Powerhouse 2020 – by Triax
4.115	British Property Federation (BPF) What Warehousing Where Report 2019

<b>CD Ref</b>	<b>Document Title</b>
4.116	Levelling Up – The Logic of Logistics by Savills on behalf of BPF (2020)
4.117	Cheshire and Warrington Local Enterprise Partnership (LEP) - Strategic Economic Plan
4.118	Cheshire and Warrington Local Enterprise Partnership (LEP) – Local Industrial Strategy (2019)
4.119	Warrington Means Business 2020
4.120	Liverpool City Region Statement of Common Ground (October 2019)
4.121	Liverpool City Region SHELMA Executive Summary (March 2018)
4.122	Liverpool City Region Assessment of the Supply of Large-Scale B8 Sites (June 2018)
4.123	Liverpool City Region Areas of Search Assessment (August 2019)
4.124	Places for Everyone Plan – Joint DPD (August 2021)
4.125	Updated Note on Employment Land Needs in Greater Manchester (March 2021)
4.126	Economic Forecasts for Greater Manchester (February 2020)
4.127	Places for Everyone Employment Topic Paper (July 2021)

CD Ref	Document Title
4.128	Land at Junction 25 of the M6 Motorway in Wigan (allowed, June 2021) (Ref: APP/N4250/V/20/3253242)
4.129	Land to West of Wingates Industrial Estate, in Bolton (allowed, June 2021) (Ref: APP/V4205/V/20/3253244)
4.130	Land at Omega Zone 8, West of Omega South and South of the M62, St Helens (also known as Omega West) (allowed, November 2021) (Ref: APP/H4315/V/20/3265899)
4.131	Former Parkside Colliery in Newton-le-Willows in St Helens (allowed, November 2021) (Ref: APP/H4315/V/20/3253194)
4.132	Haydock Point, Land at A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens (dismissed, November 2021) (Ref: APP/H4315/W/20/3256871)
<b>DR04 – Summary of SoS Decisions on recent Employment sites in the North West</b>	
4.133	APP/H4315/V/20/3253230 and APP/M0655/V/20/3253232 Land between A49 Winwick Road and A573 Parkside Road, including a proportion of the former Parkside Colliery Site and land from the A573 Parkside Road to A579 Winwick Lane connecting to M6 Junction 22

CD Ref	Document Title
<b>DR05 – Employment Alternative Sites Assessment (ASA) Update Statement</b>	
4.134	Statement of Common Ground between Warrington Borough Council and Peel L&P (Holdings) UK Ltd (SG02: August 2022)
4.135	Local Plan CD31 Matter 6c – Fiddlers Ferry Note for Inspectors
<b>DR08 – Climate Change and Energy</b>	
4.136	Decarbonising Transport – Setting the Challenge (March 2020)
4.137	Decarbonising Transport – A Better, Greener Britain (2021)
4.138	Warrington Electric Vehicle Charging Strategy (December 2022)
4.139	Land at Barleycastle Lane, Appleton Thorn, Warrington (November 2020) (Ref: APP/M0655/W/19/3222603) and APP/M0655/V/20/3253083)
4.140	Land South East of Williamthorpe Road, Derbyshire (allowed, October 2020) (Ref: APP/R1038/W/20/3251224)
4.141	Transport for the North – Freight and Logistics Strategy (2022)



CD Ref	Document Title
4.142	The Northern Powerhouse One Agenda, One Economy, One North (2015)
4.143	Knight Frank Logistics Market Outlook 2022
4.144	The Atlantic Gateway Strategic Plan 2018
4.145	Cheshire and Warrington Local Enterprise Partnership (LEP) Delivery Plan 2022/23
<b>Call-In Documents</b>	
4.146	Six 56 Warrington – Further Information Statement to support Environmental Statement (March 2023)
4.147	Section 106 Agreement
4.148	Draft Planning Conditions
4.149	Statement of Common Ground (with Appendices) – signed 01.03.2023
4.150	Secretary of State Letter dated 22 November 2022
4.151	WBC Officers Report to Committee dated 10 March 2022
4.152	WBC Statement of Case (with Appendices) dated February 2023
4.153	Secretary of State Letter dated 16 May 2022
4.154	Cheshire East Decision Notice dated 19 May 2022

<b>CD Ref</b>	<b>Document Title</b>
4.155	Warrington Borough Council – Statement of Common Ground
4.156	Letter from Planning Inspectorate dated 8 February 2023
4.157	Inspector’s Summary and Directions dated 15 February 2023 following the Case Management Conference held on 15 February 2023
<b>Employment Land Quantum</b>	
4.158	National Planning Practice Guidance – Planning Practice Guidance (PPG) – Housing and economic needs assessment, paragraphs 026-031
4.159	Warrington Economic Development Needs Assessment Refresh 2021, BE Group for Warrington Borough Council
4.160	Local Plan Examination Document CD10
4.161	Local Plan Examination Document CD10a
4.162	BE Group response 13 January 2023 to PINS letter ref PINS/M0655/429/2
4.163	Warehousing and Logistics in the South East Midlands – Icen Projects Limited on behalf of South East Midlands Local Economic Partnership (2022)
4.164	HCA Additionality Guide (2014)
4.165	HCA Density Guide 2015

CD Ref	Document Title
<b>Case Law</b>	
5.1	The Court of Appeal Judgement in the case of Mordue v Secretary of State for Communities and Local Government and others [2015] EWCA Civ 1243
5.2	The High Court judgement in R. (oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited [2019] EWHC 2899 (Admin)
5.3	High Court decisions in R (oao CPRE Kent) v Dover District Council [2016] EWCA Civ 936 and R (oao Shasha) v Westminster City Council [2016] EWHC 3282 (Admin)
5.4	The Queen (on the application of) Kenneth Kay v Secretary of State for Housing Communities and Local Government and Ribble Valley [2020] EWHC 2292 (Admin)
5.5	Supreme Court Decision: R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020]
5.6	Euro Garages Ltd v The Secretary of State for Communities and Local Government & ANOR [2018] EWHC 1753
5.7	Wavendon Properties Limited v SSHCLG and Milton Keynes Council [2019] EWHC 1524 (Admin)

CD Ref	Document Title
5.8	Appeal 2022 Danescroft (Swindon PCDF IV) LLP v Swindon Borough Council – Land at Foxbridge North (Scheduled Monument)
<b>Proofs of Evidence and Appendices of the Applicant</b>	
6.1	Noise – Dani Fiumicelli
6.2	Landscape – Carl Taylor
6.3	Heritage – Jim MacQueen
6.4	Transport – Alex Vogt
6.5	Air Quality – John Drabble
6.6	Ecology – Liz Seal
6.7	Employment Land Demand – Andy Pexton
6.8	Planning – Dave Rolinson
6.9	Employment Land Quantum – Matt Kinghan
6.10	Factual Statement – Dave Rolinson
<b>Proof of Evidence of the Rule 6 Party</b>	
7.1	Proof of Evidence – John Groves BA(hons) MRTPI - Summary (Final) 11 April 2023

7.2	Proof of Evidence – John Groves BA(hons) MRTPI - V3 (Final) 11 April 2023
7.3	Appendix 10 - Counsel's Opinion – Prematurity
7.4	Appendix 11 - Compton Parish Council, Julian Cranwell and Ockham Parish Council vs Guildford Borough Council and the Secretary of State for Housing Communities and Local Government [2019] EWHC 3242 (Admin) paragraph 70
<b>Documents submitted since the submission of proofs of evidence</b>	
8.1	Draft Planning Conditions 25-04-23
8.2	Draft CIL compliance statement 25-04-23
8.3	Draft s.106 (Six 56) - 25.04.2023
8.4	Draft S.106 Points of Discussion - 25.04.2023
8.5	Gateley Legal - Applicant Summary and list of payments - 25.04.2023
8.6	Letter from applicant to Alison Dyson (PINS) - 25.04.2023
<b>Inquiry Documents</b>	
ID1	STRETTON NDP comments to SoS enquiry V1

ID2	William Mack – Inquiry Statement
ID3	SWP Statement of Case 2301001 v1
ID4	Cllr Harris – Inquiry Statement
ID5	Natural England Response 2019
ID6	Applicant Opening (to follow)
ID7	Rule 6 Party Opening (to follow)
ID8	Mr Webster - Inquiry Statement
ID9	Dr McAloon – Inquiry Statement
ID10	Mr Thrower - Inquiry Statement
ID11	P Ellam - Inquiry Statement
ID12	Cllr Mark Jervis – Inquiry Statement
ID13	Cllr Marks – Inquiry Statement

ID14	Mr Taylor – Inquiry Statement
ID15	D Hoskinson – Inquiry Statement
ID16	six56 landscape Ramboll response
ID17	six56 Genecon response
ID18	Agreed S106 (to follow)
ID19	Natural England Response May 2023
ID20	Andy Carter MP Transcript
ID21	Response to representation Diane Hoskinson
ID22	Response to letter of Appleton Parish Council of 27 April 2023
ID23	Letter to PINS 12 May 2023 – Appellant’s agreement to the imposition of pre-commencement planning conditions
ID24	Arlington Securities Ltd v Secretary of State for the Environment and Crawley BC
ID25	Truro City Council v Cornwall Council

ID26	Veolia ES (UK) Ltd v Secretary of State for Communities and Local Government
ID27	Worthing BC v Secretary of State for Levelling Up Housing and Communities
ID28	R(on the application of Asda Stores Ltd) v Leeds City Council
ID29	Ground Levels Clarification Note
ID30	Updated Habitat Regulations Assessment – August 2021
ID31	Updated Inspector's Guidance Note re. Employment Land requirement
ID32	Six56 Shadow HRA with annexes
ID33	Natural England comments on Shadow HRA