

**PROOF OF EVIDENCE APPENDICES
OF DAVID ROLINSON**

PLANNING MATTERS

EXTRA MSA

WARRINGTON MOTORWAY SERVICE AREA, J11 M62

**LOCAL PLANNING AUTHORITY APPLICATION REFERENCE:
2019/35726**

**PLANNING INSPECTORATE REFERENCE:
APP/M0655/W/21/3288180**

TOWN AND COUNTRY PLANNING ACT 1990 SECTION 78

**TOWN AND COUNTRY PLANNING (DEVELOPMENT
MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015**

**TOWN AND COUNTRY PLANNING (INQUIRIES
PROCEDURE) (ENGLAND) RULES 2000**

Report Author	Dave Rolinson
Report Date	Feb 2022
Project No.	4151
Document Ref.	P0-TP-SPA-RP-P4151-0034-A
Revision	A

Contents

DR01 - Statement of Mr Malcolm Reeve on Agricultural Matters

DR02 - Summary of Assessment on Flood Risk, Drainage and Ground Conditions

DR03 - Cumulative Noise and Air Quality Assessment of HS2 Ltd latest highways estimates

DR04 - Summary of Assessment of Retail, Food and Drink and Hotel uses (including Hotel Provision Update)

DR05 - Comparative Assessment Report

DR06 - Summary of Assessment Note on the Need for Alternative Fuels

DR01 - Statement of Mr Malcolm Reeve on Agricultural Matters

TOWN AND COUNTRY PLANNING ACT 1990

APPEAL BY: Extra MSA Group

Land to the North of Junction 11, M62 Motorway,
Warrington WA3 7UD

Statement

of:

M J Reeve
BSc, FISOilSci

on the impact on agricultural land and soil resources

Land Research Associates Ltd
Lockington Hall
Lockington
Derby DE74 2RH
Tel: 01509 670570

www.lra.co.uk

E-mail: malcolm.reeve@lra.co.uk

Appeal reference: APP/M0655/W/21/3288180
LPA Reference: 2019/35726

Date of inquiry: 23rd March, 2022

Date of this statement: 14th February, 2022

Land
Research
ASSOCIATES

CONTENTS

1. Qualifications and Experience	2
2. Instructions and Background.....	3
3. Scope of my Evidence.....	3
4. The Application Site.....	3
5. Quantum of impacts and their significance	6
6. Retention of the highest quality agricultural land	7
7. Conclusions.....	7
Appendix MJR 1 2021 updated agricultural land quality map	9

1. QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Malcolm James Reeve. I am a Bachelor of Science (Geography & Geology) of the University of Bristol, an Honorary Fellow of the British Society of Soil Science, past President of the Institute of Professional Soil Scientists and a recent Member of the British Institute of Agricultural Consultants.
- 1.2 I am a consultant to Land Research Associates Ltd, a private practice established in 1991 specialising in soil, land resource and agricultural advice for national and international companies, UK government departments and private individuals. Through my consultancy work over the last 30 years and employment prior to 1991 with the Soil Survey and Land Research Centre I have been involved in soil and agricultural land investigation and research for more than 45 years.
- 1.3 Since 1980 much of my work has centred on the assessment and/or protection of soil resources and land quality of greenfield sites likely to be disturbed by mineral working or built development. This work has included pre-development soil and agricultural land quality surveys over several thousand hectares of England and Wales, and advice on mitigating adverse impacts on soil functions during site operations. My experience in such matters has resulted in being asked to contribute to Defra research projects and reviews relating to soil protection and agricultural land quality.
- 1.4 Work over the past 12 years relevant to the proposal that is the subject of this inquiry includes:
 - Expert evidence on agricultural land quality for planning inquiries and hearings into proposed residential development of farmland in Cheshire, Staffordshire, Bedfordshire, Buckinghamshire, Staffordshire, West Sussex and south-west Leeds (Developers, 2013-2017).
 - Senior author of a report for Defra, the contents of which were subsequently published as the *Construction Code of Practice for Sustainable Use of Soils on Construction Sites* (Defra, 2009).
 - Agricultural land quality survey and impact assessment of the proposed rail-linked 215 ha East Midlands Gateway logistics park and associated road improvements, including the Kegworth Southern Bypass. Subsequent preparation and supervision of a specialist soil re-use and management strategy for implementation of the project after planning permission was granted (Segro-Roxhill and Winvic Construction, 2013-18).
 - Expert evidence on agricultural land use and quality for proposed motorway service areas on the M25 and M42 (Extra MSA Group, 2021).

- 1.5 My experience in agricultural land quality assessment resulted in being asked to help deliver an annual two-day course in Agricultural Land Classification, organised as part of the British Society of Soil Science 'Working with Soil' initiative.

2. INSTRUCTIONS AND BACKGROUND

- 2.1 I was contacted in July 2021 to ask if I could provide advice on agricultural land classification (ALC) of the application site, in particular the difference in the findings of an ALC survey undertaken for the planning application that is the subject of this appeal and an ALC survey of the same land for a previous planning application. I was subsequently instructed by Extra MSA to undertake a desk study and verification ALC survey of the agricultural part of the application site. As part of my site visit, I met with the current farmer of the land and the site manager of the adjacent landfill.
- 2.2 After refusal of the planning application by Warrington Borough Council and an appeal being lodged, I was asked In November 2021 to prepare this statement covering the loss of the agricultural land resource to the project.

3. SCOPE OF MY EVIDENCE

- 3.1 My evidence will cover:
- recent agricultural use of the site and drainage constraints,
 - the verification ALC survey that I undertook in August 2021 and the difference in my findings from the agricultural land classification (ALC) surveys reported by SLR Consulting in 2006 and Wardell Armstrong in 2019,
 - the quantum of loss of best and most versatile land to the proposals, and loss in the context of the local resource of high-quality agricultural land,
 - protection of the resource of deep peat soils and the associated grade 2 land within the application area.

4. THE APPLICATION SITE

Agricultural use

- 4.1 The application site is owned by the operators of the adjacent Risley Landfill. The land has been farmed for 10 years on an annual rolling basis by Hoyles Moss Farm (C&G Moss) which is located to the south of the M62. The farmer reports that the field has presented some agricultural challenges including rabbit predation of crops alongside the eastern edge of the field and patches of very wet soils in the western part. This variability has resulted in the field being cropped in separate strips or blocks. The central part was supporting a crop of grass mown for hay at the time of my visit in August 2021 and a crop of triticale wheat had recently been harvested from the eastern margin and south-western end of the field.

Agricultural land quality

- 4.2 To assist in assessing land quality, the Ministry of Agriculture, Fisheries and Food (MAFF) developed a method in the 1970s for classifying agricultural land by grade according to the extent to which physical or chemical characteristics impose long-term limitations on agricultural use for food production. The first version of the Agricultural Land Classification (ALC) system divided land into five grades, with grade 1 being the highest quality and grade 5 the lowest. Because grade 3 covered such a large area of land a new more quantitatively-based version of the classification was published in 1988. That divided grade 3 into two sub-grades. Land of grades 1, 2 and subgrade 3a were subsequently categorised as representing the 'best and most versatile' agricultural land, a land category that features in current planning guidance.
- 4.3 While the whole country is covered by the early, mainly qualitative, 'provisional' agricultural classification maps (currently available only at reconnaissance scale of 1:250,000 on Natural England's MAGIC website), those maps are stated to be inaccurate for any areas of land smaller than 80 ha in extent. Since 1988 only small areas of the country have been mapped according to the current classification that subdivides grade 3 into sub-grades 3a and 3b.
- 4.4 Earlier surveys of the appeal site by SLR Consulting and Wardell Armstrong had established that much of the field was covered by peaty soils. Drainage is a key controller of the agricultural quality of peat land as it controls the period during which soils are too wet for mechanised agricultural operations. Where water tables can be maintained so that they seldom rise within 70 cm of the surface, non-acidic deep peat soil can usually be classified as grade 1 land. Where groundwater levels are less well controlled or the peat is thinner, the same land is downgraded to grade 2 or occasionally subgrade 3a. Consequently, the agricultural land quality survey I undertook in August 2021 gave close consideration to soils and drainage.

Soils and drainage

- 4.5 The agricultural land occupies the northern margin of Pestfurlong Moss. My survey found a varying depth of peaty soils covering the majority of the field, but thinning to the west and north with an absence of peat in the north of the field. In many western parts of the field the peat is little more than 30 cm thick over slowly permeable grey-mottled clays or clay loams that pass to reddish brown clay at a depth of 40-60 cm below the surface. To the east and south-east the peat increases in depth; an area in the south-east of the field has humified peat topsoils over a semi-fibrous peat substrate that extends to a depth of at least 1 m. These findings are consistent with the results of the peat depth survey by Wardell Armstrong in 2019.
- 4.6 Site-specific information on arterial and in-field drainage was supplied by the Site Manager for the Risley Landfill site and by the farmer of the land. The field drains to the north via a

brook (Silver Lane Brook) that runs along the western side. The brook also receives drainage from the adjacent landfill, run-off from the motorway and from lagoons that discharge into the brook to the north of the application site. Consequently, it is often at capacity in winter months and very wet weather at other times of the year, and this can result in the western margin of the field suffering short-term flooding.

- 4.7 Wet areas in the south-western quadrant of the field at the time of my survey in August 2021 could probably be ameliorated slightly by the installation of new drains. However, as the north-west corner of the field is almost level with the height of water in the adjacent brook during the wet winter months, the farmer considered that the lack of outfall precludes any significant improvement in drainage across the field as a whole.
- 4.8 The eastern margin of the agricultural field had been drained effectively as part of the installation of a gas main that runs parallel to the eastern edge.

Land grades mapped

- 4.9 My survey found three land grades within the agricultural field, Grade 2, Subgrade 3a and Subgrade 3b, their distribution related to depth of (or absence of) peat and soil wetness. The areas covered by these land grades are shown on a map in an appendix to this statement and in Table 1 below.
- 4.10 An area grade 2 land is mapped within the south-eastern part of the field where the land is slightly higher and peat soils are deep. This area has been delineated using the >1 and >1.5 contours on the Wardell Armstrong detailed map of peat depth (CD1.1.19). A 2006 ALC survey of the field that formed part of a planning application by Biffa for extension of the Risley Landfill site delineated an area of grade 1 land in the south-east corner of the field. My survey observations within this area encountered groundwater at around 1 m below the surface in August 2021, indicating a soil wetness class of III, which precludes grade 1. No grade 2 was mapped by Wardell Armstrong's 2019 survey as it assumed the same level of soil wetness (wetness class of IV) across the whole field, including the higher parts.
- 4.11 Subgrade 3a is the dominant subgrade across the field. Humified peat topsoils are almost everywhere over slowly permeable mineral subsoils within 35 cm of the surface, leading to a soil wetness class of IV and sub-grade 3a land.
- 4.12 Subgrade 3b occupies a small area in the north of the field where peat has disappeared over the decades as a result of oxidation. Topsoils are heavy clay loams, patchily organic, and almost directly on slowly permeable clay subsoils. These characteristics limit the period available for cultivations, crop establishment and harvesting.

Table 1. Agricultural area occupied by the different land grades

Grade/subgrade	Area (ha)	% of the agricultural land
Grade 2	3.3	28
Subgrade 3a	7.0	60
Subgrade 3b	1.4	12
Total	11.7	100

5. QUANTUM OF IMPACTS AND THEIR SIGNIFICANCE

Agricultural use

5.1 Warrington Borough Council's Development Management Committee Report of the 9th June 2021 (CD1.2.11(a)) considered the impacts on agricultural land of the application in relation to Policy CC2 of the Local Plan Consultation Study and paragraphs 170 and 171 of the NPPF (now paragraphs 174 and 175 in the 2021 version of the NPPF).

5.2 Policy CC2 states that:

Development proposals in the countryside which accord with Green Belt policies set out in national planning policy will be supported providing that it can be demonstrated that they relate to local enterprise and farm diversification; and that there would be no detrimental impact on agricultural interests.

5.3 The development proposal does not relate to local enterprise and farm diversification. The appeal site is let on an annual rolling basis to C&G Moss with no security of tenure. Their main agricultural operation is centred on Hoyles Moss Farm and loss of use of the field north of the M62 would have no significant impact on the overall farming business.

Protection of best and most versatile agricultural land

5.4 The 2021 revision of the National Planning Policy Framework (NPPF) states at paragraph 174 that:

Planning policies and decisions should contribute to and enhance the natural and local environment by b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

A footnote to paragraph 175 states that:

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

5.5 Policy ENV 8 (Environment and Amenity Protection) of the of the Warrington Borough

Council's updated proposed submission version Local Plan, 2021-2038 (CD3.2.2(c)) states in paragraph 8 that *'Development proposals will need to demonstrate that any loss of the Borough's best and most versatile agricultural land will be minimised'*.

- 5.6 My survey shows that 88% (10.3 ha) of the agricultural land in the application site is in the best and most versatile category, a third in grade 2 and two thirds in the poorer subgrade 3a. The latter tends to be the main constraint to agricultural use of the field as a whole.
- 5.7 The magnitude of impact on best and most versatile land depends on the amount to be taken by a development. Article 16, Schedule 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 only requires Natural England to be consulted (on behalf of the Secretary of State for the Environment, Food and Rural Affairs) on development that involves the loss of not less than 20 ha of grades 1, 2 or 3a agricultural land or where development could lead to cumulative losses exceeding 20 ha of grades 1, 2 or 3a agricultural land. Consequently, the loss of areas smaller than this threshold is considered to have a small or very small impact on the national stock of best and most versatile land. Losses of over 80 ha of best and most versatile land are equivalent to the size of a medium farm and are considered to be of large impact.
- 5.8 Warrington Borough Council's Development Management Committee Report of the 9th June 2021 (CD1.2.11(a)) also considered the impacts of the application on agricultural land in relation to paragraphs 170 and 171 of the NPPF. The overall conclusion in respect of best and most versatile agricultural land is in paragraph 8.80 of the Committee Report:

... the loss of best and most versatile land is considered to result in minor harm that weighs against the proposal but the loss itself would not be significant in its own right and Natural England do not object to the application.

6. RETENTION OF THE HIGHEST QUALITY AGRICULTURAL LAND

- 6.1 The agricultural land lies at the western margin of the Manchester Mosses where, because the peat soils have thinned, the agricultural quality is not as high as within the larger spreads of peat soils to the east and south where much of that in agricultural use is mapped as grade 1 and grade 2. Because of the constraints of the high-pressure gas main running parallel to the eastern edge of the field and the need to retain the carbon sink provided by the deepest peat soils, the eastern part of the field will remain free of construction impacts. Consequently, most of the area covered by the grade 2 land will be retained, although managed in future for ecological benefit.

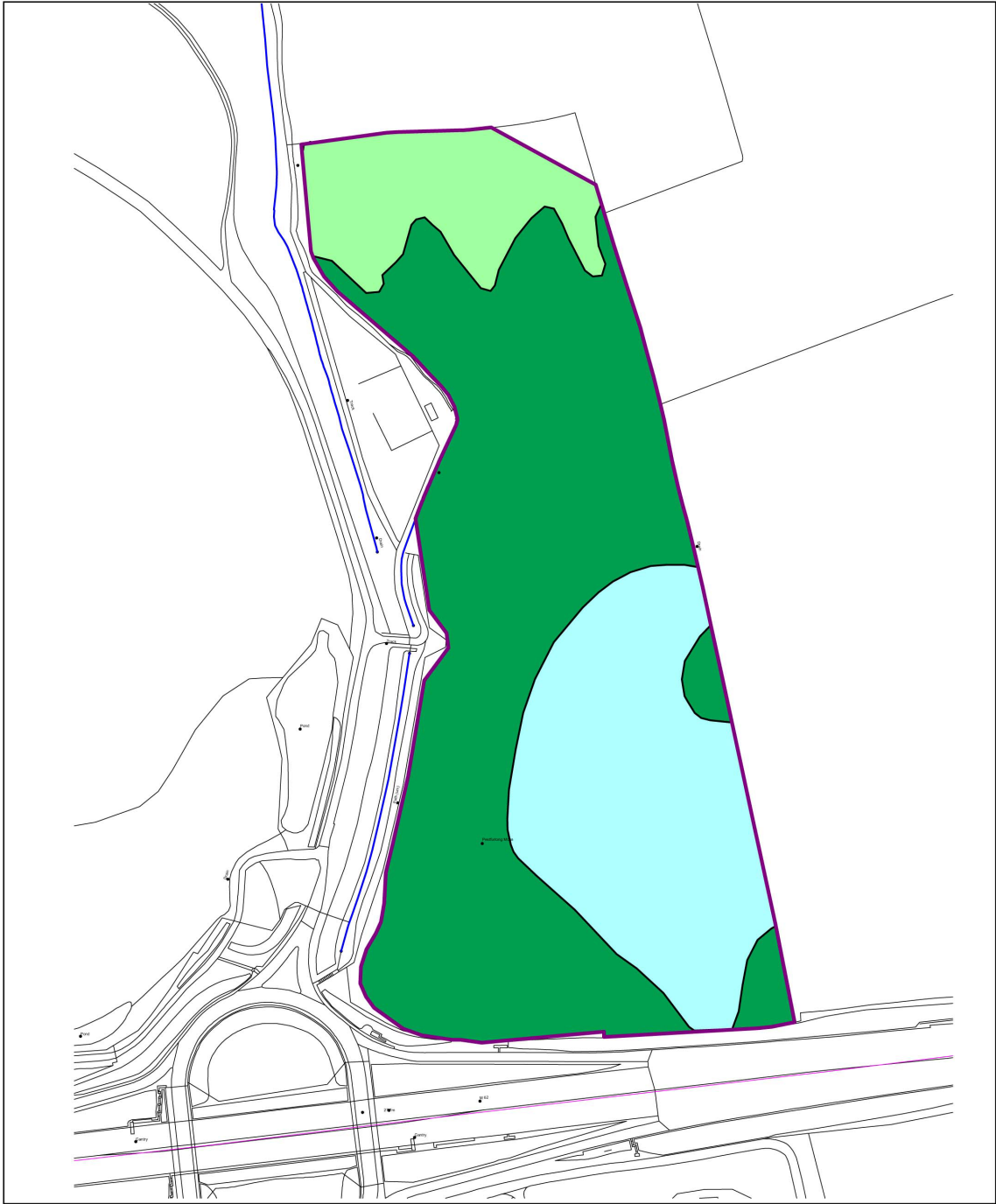
7. CONCLUSIONS

- 7.1 The agricultural component of the appeal site is farmed on an annual rolling agreement by Hoyles Moss Farm and its loss to the farm business would not have a significant impact on the main business of the farm south of the M62.

- 7.2 My agricultural land classification survey indicates that 88% (10.3 ha) of the agricultural land in the application site is in the best and most versatile category, a third in grade 2 and two thirds in the poorer subgrade 3a. The latter tends to be the main constraint to agricultural use of the field as a whole. Although predominantly in the best and most versatile category of agricultural land, the field is somewhat poorer in quality than most of the main extent of deep peaty soils to the east where the main agricultural quality is grades 1 and 2.
- 7.3 Most of the area of grade 2 land on the appeal site will be retained in situ to protect its important function as a carbon sink, but managed for ecological benefit rather than left available for agricultural use.
- 7.4 Paragraph 8.80 of the Warrington Borough Council's Development Management Committee report of 9th June 2021 states in relation to the planning application that:
- ... the loss of best and most versatile land is considered to result in minor harm that weighs against the proposal but the loss itself would not be significant in its own right and Natural England do not object to the application.*
- 7.5 The Council has subsequently decided not to contest the planning appeal, effectively withdrawing all reasons for refusal. However, their opinion on the minor harm of the project to the resource of best and most versatile agricultural land concurs with my own.

APPENDIX MJR 1

2021 UPDATED AGRICULTURAL LAND QUALITY MAP



<p>Client: Extra MSA □</p> <p>Project: Land north of J11 M62</p> <p>Map title: Agricultural land classification</p>	<p>KEY</p> <p>□ Grade 2</p> <p>■ Subgrade 3a</p> <p>■ Subgrade 3b</p> <p>□ Survey area</p>	<p>Scale: nts</p> <p>Date: 26/11/2021</p> <p>Land Research ASSOCIATES</p> <p>Lockington Hall Lockington Derby DE74 2RH Tel: 01509 670570</p>
---	---	---

DR02 - Summary of Assessment on Flood Risk, Drainage and Ground Conditions

CLIENT:	Extra MSA
PROJECT:	Warrington MSA
SUBJECT:	Summary of Assessment on Water Resources, Flood Risk, Drainage and Ground Conditions.
JOB NO.:	LD10318
DATE:	16 February 2022
PREPARED BY:	Craig Speed, Associate Director (Water Resources) Ashley Smith, Senior Engineer (Drainage and Flood Risk)
REVIEWED BY:	Will Mulvany, Associate Director (Planning)

1 WATER RESOURCES - CHRONOLOGY

- 1.1 An Environmental Statement (ES) was produced in August 2019, comprising two parts: ES Part 1 (CD1.1.33) and ES Part 2 (which includes a series of Technical Papers including the Water Resources Technical Paper 3 (CD1.1.34), Geology and Ground Technical Paper 1 (CD1.1.35), Agricultural Land and Soils Technical Paper 10 (CD1.1.44) and Ecology and Nature Conservation Technical Paper 5 (CD1.1.39).) as well as a Non-Technical Summary. The ES assessed any potential effects of the Proposed Development on the Silver Lane Brook main river, Peat deposits on the site, the Helsby Sandstone Principal Aquifer and the groundwater (drinking water) Source Protection Zone 3 underlying the site. Hydro-ecologically designated sites within 5km of the Site include the Manchester Mosses Areas of Conservation SAC, Holcroft Moss SSSI and Risley Moss SSSI.
- 1.2 A Water Framework Directive (WFD) Screening Assessment is normally required by the Environment Agency for proposed developments that need an EIA to provide a more holistic assessment of potential impacts on water resources (particularly during the operational phase) by consideration of the risk of WFD status deterioration for the groundwater or surface water body. A WFD Screening Assessment was included as part of the original Water Resources ES chapter. However, the Environment Agency requested additional information to support the Screening Assessment. A revision was made to the WFD Assessment in March 2020 (CD1.2.9(i)) to address the Environment Agency's comments (outlined in **Section 6**).

- 1.3 A conceptual site model report was submitted in January 2020 to support the ES Technical Paper (CD1.2.9(g)) and provide a preliminary assessment of potential groundwater risk of the Site with a specific focus on the Fuel Filling Station (FFS). The conclusion of this work was that there is a low to negligible likelihood of risk of pollution occurring to controlled water from the fuel filling activities of the development, because the tanks will be installed within a low permeability stiff clay with several metres (potentially up to 7m) of stiff clay between the tanks and the underlying Principal Aquifer. The report recommended further site investigation to determine the site-specific geology and hydrogeology.
- 1.4 An Addendum to the ES (including the Water Resources Technical Paper 3 (CD1.1.34), Geology and Ground Technical Paper 1 (CD1.1.35), Agricultural Land and Soils Technical Paper 10 (CD1.1.44) and Ecology and Nature Conservation Technical Paper 5 (CD1.1.39).) was submitted in January 2022 to primarily provide an update to the cumulative assessment in light of additional information made available by the Secretary of State for Transport and HS2. The cumulative effects relate to the HS2 project with the Site lying within the Glaze Brook surface water catchment and the Helsby Sandstone Formation groundwater body and SPZ3. The assessment concluded the following:
- The potential construction and operational cumulative effects arising from HS2 and the Proposed Development are considered to be negligible.
 - Similarly, there would be no change to the operational cumulative effects between the Proposed Development and HS2 in the long term (>11years).

2 LIAISON WITH THE EA

- 2.1.1 There was on-going dialogue with the Environment Agency, including a pre-application/EIA Scoping meeting and discussion.
- 2.1.2 A consultation meeting was held with the Environment Agency on 9th April 2019 to discuss (among other aspects) the Silver Lane Brook Diversion proposals, Flood risk and Surface water drainage.
- 2.2 The Environment Agency provided a holding objection to the outline application in January 2020 (Ref. SO/2019/119672/02-L01) (CD1.2.6) on the basis that 'Insufficient information has been submitted to determine risks to groundwater', more information was required on the realignment of the Silver Lane Brook in relation to flood risk and 'insufficient evidence has been provided by the WFD Screening

Assessment to assess compliance'. As indicated above, there was on-going dialogue with the Environment Agency in this regard.

2.3 The EA outlined a methodology of overcoming their holding objections which required the following:

- Specific river diversion information to be provided on bed and bank material, channel construction and surface water drainage, which has been addressed as outlined in this document in **Section 4.1.3**.
- Evidence to show that the risks posed by the scheme have been fully assessed under the Water Framework Directive and meet the objectives of the River Basin Management Plan (RBMP), which has been outlined in **Section 6.1.1**.
- Hydrogeological Impact Assessment (also known as a Detailed Quantitative Risk Assessment or DQRA), which has been addressed as outlined in **Section 12.1.1** and **Section 12.1.2**.

2.3.1 The information requested was subsequently collected and supplied to the Environment Agency, who confirmed on 27 April 2020 (SO/2019/119672/04-L01) that the “additional information provided is considered sufficient to overcome our previous objections, however the development will only be acceptable if the following conditions are included on the planning permission’s decision notice” as outlined in the sections that follow.

3 PLANNING CONDITIONS

3.1 The following sections present the text of the planning conditions (as they appear in the Officer’s Report to Planning Committee and as agreed through the General Statement of Common Ground (CD1.2.11(a) and CD2.4.4) and provide bullet point text outlining how each are addressed by the Proposed Development.

4 DIVERSION OF SILVER LANE BROOK

4.1.1 **Condition 23 (Environment Agency - Brook Diversion):** *No development shall take place until the applicant has provided evidence to show that the risks posed by the scheme have been fully assessed and included sufficient information to reach a high level of confidence that the scheme proposals meet the objectives of the River Basin Management Plan (RBMP). The detailed design for the proposed diversion of Silver Lane Brook and adjoining riparian corridor shall be submitted to, and approved in writing by, the local planning authority.*

4.1.2 **Reason:** *To comply with paragraph 170 of the National Planning Policy Framework (NPPF), which recognises that the planning system should enhance the environment by preventing development from contributing to, or being put at unacceptable risk from, water pollution. The WFD Regulations also require that all water bodies are protected from deterioration and pollution. If a significant risk of water pollution from a development cannot be avoided or adequately mitigated, planning permission should be refused.*

4.1.3 The following are specific requirements of Condition 23 (bold) with outline of how each are addressed:

- **Sufficient cross-sections to represent all design proposals** – the sections issued during the course of the consideration of the outline planning application by the Local Planning Authority are representative (indicative) sections of what is achievable based on the constraints of the site. The diversion channel will incorporate all the suggestions stated in SH11739-010 Framework Ecological Management Plan Section 2.7 – Framework Management for Brook Re-alignment (Appendix 5.10 of Ecology and Nature Conservation ES Technical Paper and its Addendum (CD2.5.9). Exact details and position of features will be confirmed during the detailed design stage.
- **Details of bed and bank substrate** - Exact details on the construction make-up of the bed and bank will be set out at the detailed design stage. Given the position of the peat and potential for ground water inflow a compacted clay liner of minimum thickness of 0.3m was proposed in accordance with Specification for Highway Works (SHW).
- **Detailed proposals for any new structures within 8 m of the channel and any bed/bank protection and its installation:** This aspect has been noted and will be addressed in detail at the detailed design stage.
- **A pre and post construction monitoring plan for the Silver Lane Brook channel:** Monthly surface water quality sampling is proposed for 12 months from two locations: in the original Silver Lane Brook channel in the pre-construction phase (baseline) and in the postconstruction phase in the diverted channel, and analysed using a laboratory analysis suite designed to define the baseline using WFD classification parameters and assess any deviations from the baseline after construction as the channel becomes established following the diversion. The

monitoring should also include spot flow monitoring and aquatic ecological surveys.

5 FLOOD RISK, NEED FOR A FRAP

- 5.1 The drainage strategy submitted to the Lead Local Flood Authority (LLFA) was accepted and provided no objection, subject to the discharge of Condition 22 (Surface Water Drainage Scheme).
- 5.2 The site is located in a Flood Zone 1 (FZ1) and the existing route for the Silver Lane Brook is considered to be low risk for fluvial flooding. Throughout the Site there are limited areas of pluvial (surface water) flooding as a result of a combination of the existing topography and ground conditions.
- 5.3 The Flood Risk Assessment concludes that the Site would not be at risk from flooding.
- 5.4 A Flood Risk Activity Permit (FRAP) is required as the Silver Lane Brook is designated as a 'main river'. The requirements of the permit (standard or bespoke) would be determined at the detailed design stage outside the planning process under the Environmental Permitting Regulations (2016).

6 REVISED WATER FRAMEWORK DIRECTIVE ASSESSMENT AND CONCLUSIONS DRAWN

- 6.1 **Condition 24 (Environment Agency - Brook Diversion) Contd.** *A Water Framework Directive Screening Assessment must provide enough evidence to demonstrate with a high level of confidence that the activity supports the objectives of the River Basin Management Plan (RBMP). This application seeks to fill in Silver Lane Brook and relocate it. The diverted Silver Lane Brook should be designed to provide an ecologically diverse watercourse, with minimal artificial modifications, which reinstates natural processes and provides a betterment to the existing....*
- 6.2 **Reason:** *Insufficient information is available at outline design stage to provide adequate evidence with regard to the WFD biological elements to conclude that the scheme will be compliant having regard to the paragraph 170 of the National Planning Policy (NPPF), and the WFD Regulations.*
- 6.3 *The EA therefore concluded that the proposed development will only be acceptable if the above planning condition is included.*
- 6.3.1 A detailed revision of the Water Framework Directive Screening Assessment was provided (March 2020) (CD1.2.9(i)), which concluded the following (that was accepted

by the Environment Agency subject to this condition being addressed at the detailed design stage):

- This identified no effect that risks causing deterioration in WFD status at either the Silver Lane Brook on the local scale or the River Glaze on the water body scale.
- Aquatic ecological surveys determined that the Proposed Development did not contain protected species or vulnerable receptors that would be impacted by either the construction or operation of the Proposed Development.
- The diversion of the Silver Lane Brook will only have a short-lived and reversible effect for aquatic ecological receptors.
- For hydromorphological elements, the construction will result in a channel form that is likely to lead to betterment, rather than deterioration.
- Any risk of deterioration in relation to silt-laden water and hydrocarbons during construction, and hydrocarbons and heavy metals during the operational phase will be effectively mitigated by implementation of the CEMP and SuDS / Petrol Interceptor, respectively, prior to discharge to the diverted Silver Lane Brook.
- The only measure from the WFD programme of measures that applies to the River Glaze surface water body is the 'Phosphorus Reduction in the Glazebury WwTW' measure, which is not relevant to the Proposed Development as it will not be served by the Glazebury WwTW.
- As the site is underlain by 7-13m of clay-rich Till, which provides the groundwater in the Principal Aquifer with effective protection from groundwater pollutants, the installation and operation of underground fuel storage tanks within the Till is unlikely to lead to deterioration in WFD status for the underlying groundwater body.

6.3.2 Condition 25 (Environment Agency - Undeveloped Buffer Zone): *No development shall take place until a scheme for the provision and management of an undeveloped buffer zone has been approved by the local planning authority. This undeveloped buffer zone should be at least 8 meters wide (on both sides of the river), measured from bank top for the whole extent of Silver Lane Brook. Bank top is defined as the point at which the bank meets normal land levels as designated on a site plan.....*

6.3.3 Reason: *This approach is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net*

gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

- This aspect has been noted and will be addressed in detail at the detailed design stage.

7 WATERCOURSE CROSSING OF DIVERTED SILVER LANE BROOK TO ALLOW ACCESS TO THE GAS MAIN AND LAND TO THE EAST

7.1 National Grid and potentially HS2 will require 24-hour permanent access for lifetime maintenance requirements to their assets that are located to the east of the site. Any future vehicular access for HS2 will come forward as part of HS2's development and therefore be fully assessed and designed as a part of their proposals at the appropriate time. Crossing of Silver Lane Brook will be required. Consultation with Environment Agency on their exact requirements and specification for type of crossing, will be undertaken.

7.2 Precise details of crossing points will be agreed with the relevant parties. It is understood that HS2 will be creating a construction access along the southern boundary of the Site. Once operational, HS2 will revert to an agreed access route across the Site.

8 USE OF PEAT AND CREATION OF PEAT HABITAT ZONE ON SITE

8.1.1 The scoping report (ES Part One Report; Appendix 18) confirmed that a peat deposit is present on site. The agricultural land is formed over basin peat, which has been drained (control of groundwater) to allow the agricultural land to be developed or improved.

8.1.2 In response to the EIA Scoping Request in December 2018, Natural England (NE) provided a written scoping response dated 10th January 2019 with regards to peat – *'Natural England advise that development on peat should be avoided. It is an irreplaceable habitat with a high biodiversity value but also performs an important role in carbon storage and water catchment management'*.

8.1.3 In response to the EIA scoping request in December 2018, WBC – Ecology Unit provided a written response dated 13th February 2019 stating: 'Excavating, storing and transporting peat carries risks of the peat drying, losing structure and losing integrity which could release carbon into the atmosphere.' Furthermore: "...retaining the peat

in-situ but sealing it underneath metalised surfaces removes any potential for the peat to be restored to become 'active' and store more carbon in future.'

- 8.1.4 In response to the EIA Scoping Request in December 2018, Greater Manchester Ecology Unit (GMEU) provided a written response dated 18th March 2019 stating - '*In terms of how the underlying substrate on the site (peat) is to be treated to facilitate the development an Assessment of potential options should be made.*' During a site meeting and follow up email received 10th June 2019 with NE's Peat Specialist Dr Paul Thompson, NE confirmed that there are no Annex 1 Habitats on the proposed development site and that the habitats on site are not irreplaceable.
- 8.1.5 GMEU gave a further response following a meeting at their Tameside Offices stating: '*peat management should be considered in line with a peat management hierarchy:*
- *Avoidance (prevent production of waste peat)*
 - *Reuse on site (minimise carbon loss and maximise ecological benefit)*
 - *Reuse off site (habitat creation or restoration)*
 - *Reuse off site (other applications such as horticulture)*
 - *Disposal'*
- 8.1.6 During an email exchange between 12th – 12th April 2019 GMEU have confirmed that the site does not meet the JNCC criteria of EU Annex 1 Habitat '*Degraded peat bogs still capable of natural regeneration*' as it is not capable of natural regeneration and the current land use is not one of the land cover types falling within the definition. The Site therefore cannot be considered to be a potential component of the Manchester Mosses Special Area for Conservation (SAC).
- 8.1.7 During a site meeting and follow up email received 10th June 2019 with NE's Peat Specialist Dr Paul Thompson, NE confirmed that there are no Annex 1 Habitats on the proposed development site. NE advised that the Developer should consider retaining peat in situ so it does not lose carbon or wetland creation on a neighbouring parcel of land. In addition, that wet woodland is a potential consideration for habitat creation on the development site.
- 8.1.8 Soil surveys undertaken by Wardell Armstrong LLP on the 8th and 9th January 2019 confirmed the presence of peaty topsoils (defined as organic-rich clay loams) across the entire Site which are underlain in part by peat, with an average depth of 0.36 m.
- 8.1.9 The organic-rich topsoil is characterised by highly degraded, amorphous acidic black peat, with a low content of coarse fibres and wood remains and a low to moderate

content of fine fibres. Although identified as peat, absence of viable peat-plant propagules in the topsoil means this soil layer can be treated as an organic-rich soil resource as opposed to a peat resource.

- 8.1.10 Where the peat extends below the topsoil, it is characterised by an increasing water content with depth together with an increasing content of fibres and wood remains, containing a high organic carbon content. As the peat is buried at depth beneath agricultural land it is not an actively forming peat bog nor does it support sensitive habitats or species, but may still form a hazard to construction on top of it due to its natural geomorphological instability
- 8.1.11 The peat is deepest (1.75 m below ground level; a thickness of 1.39m) towards the southeast of the Site, but thins out towards the north.
- 8.1.12 The presence of peat on Site presents geotechnical constraints to the placement of structures sensitive to settlement, such as buildings, roads and car parks. Therefore, the development layout has been designed to take account of this and has been evolved through discussions with key consultees such as Natural England, the Greater Manchester Ecology Unit (GMEU) and the Environment Agency.
- 8.1.13 Through the iterative design and consultation process the Proposed Development has been designed to maximise the area of undisturbed (avoided) peat, with disturbed peat to be retained within the Site for beneficial reuse in the creation of peatland type habitat.
- 8.1.14 Following a review of the various options considered in the peat re-use hierarchy the site layout was redesigned, shifting all built development further to the west and creating a Peat Habitat Zone (PHZ). This design evolution maximised the area of undisturbed (avoided) Peat, whilst allowing for all disturbed Peat to be retained within the Site for beneficial reuse in the creation of peatland type habitat. Therefore, all Peat resources within the Site will be addressed through the first two options of the hierarchy: 1. preventing the production of waste peat by avoiding excavation of the resource, and 2. minimizing environmental impacts as result of peat excavation by re-use of extracted Peat within the Site.
- 8.1.15 A topsoil strip to a depth of 360 mm will be undertaken across the full development area (including the Peat Habitat Zone), resulting in the handling of 42,000 m³ (36,938 m³ of organic-rich topsoil developed over peat and 5,062 m³ of organic and non-organic topsoil developed over clay subsoil). This will minimise the possibility of mixing

of topsoil and the underlying peat and subsequent degradation and loss of these resources.

- 8.1.16 The topsoils developed over peat and those developed over clays will be handled and stored separately to minimise the possibility of mixing of soils of different types and subsequent degradation of these resources.
- 8.1.17 The topsoil resources within the Site would be protected against damage by the adoption of industry standard measures for the management of soil, such as those set out in Defra's 2009 Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.
- 8.1.18 The layout of the Proposed Development has been designed to maximise the area of peat which is retained in situ and remains undisturbed by development. This includes all peat resources which occur within the pipeline easement and undeveloped areas to the south of the Site; and which lie within the Peat Habitat Zone. The disturbed peat from within the development area would be placed over the in situ peat within the Peat Habitat Zone, held in place by the construction of a retaining bund.
- 8.1.19 The area of undisturbed peat equates to approximately 50.1% (22,700 m³) of the peat resource on site. It is proposed that all of the peat resource will be retained in situ or reused on site in the Peat Habitat Zone.
- 8.1.20 The remaining 22,600 m³ (49.9 %) of peat which occurs within the development area will be directly transferred into a specially prepared area within the site (Peat Habitat Zone). The specialised design of the Peat Habitat Zone along with the direct transfer of peat from the development area minimises the potential for peat damage, drying or carbon loss and ensures that the Peat Habitat Zone will remain in a wetted state.
- 8.1.21 The aim will be to stabilise the peat resource present within the Site and increase the water table, creating a favourable habitat for vegetation colonisation. This will reduce carbon losses to the atmosphere, whilst creating a biodiverse habitat, comprising a varied topography with seasonally wet and permanently wet pools, marshy and waterlogged areas and areas of drier acid grassland/fen lagg. By creating a diversity of topography and habitats, the area will be more resistant to seasonal change as well as climate change. These proposals are set out in a document entitled Peatland Ecological and Construction Management Plan (Dated January 2020).
- 8.1.22 Natural England subsequently commented in a consultation response dated 26th February 2020 that *'the recommendation to apply fertiliser is inappropriate and will,*

in our view, result in a significant weed problem and will undermine the establishment of the desired bog plant species'. It was agreed that such advice would be considered at Reserved Matters when an update to the Peatland Ecological and Construction Management Plan will be supplied.

8.1.23 Prior to construction, in line with good practice and the Applicant's own working procedures, soil and peat management within the Site would be defined through a detailed site-specific Soil and Peat Management Plan (SPMP). This will be produced by a qualified soil scientist prior to construction. This will ensure that the quality of the peat is maintained and it remains in a condition suitable for reuse on site to create peatland type habitat.

9 FUEL FILLING STATION INCLUDING UNDERGROUND STORAGE OF FUEL, ISOLATED DRAINAGE WITH PETROL INTERCEPTORS

9.1.1 **Condition 21 (Environment Agency – Underground Storage Tanks):** *The development may not commence until a scheme to install the underground tanks has been submitted to, and approved in writing by, the local planning authority. The scheme shall include the full structural details of the installation, including details of: excavation, the tanks, tank surround, associated pipework and monitoring system. Reason: To ensure that the underground storage tanks do not harm the water environment in line with paragraph 170 of the National Planning Policy Framework and Position Statement D2 of the 'The Environment Agency's approach to groundwater protection'.*

- The underground fuel tanks for the refuelling station would be located within the Till (clay) and not in contact with Helsby Sandstone Formation, affording the Helsby Sandstone aquifer a degree of protection from the underground fuel storage tanks. At the detailed design phase, further site investigation (SI) works will be undertaken to establish the depth of the Till that underlies the Site, especially underlying the refuelling station and determine if any bespoke mitigation is required.
- The refuelling station would be designed in accordance with APEA and Energy Institute design, construction, modification, maintenance and decommissioning of filling stations (known as the Blue Book), 4th edition and Best Available Techniques (BAT) reference documents (BREFs).
- Design of fuel filling station surface water drainage will be designed in accordance with relevant standards and manufacturers specifications. The detailed site investigation

will help determine exact requirements and maximum allowable depth to install the tanks at.

10 PARKING AREAS AND ASSOCIATED DRAINAGE INCLUDING PETROL INTERCEPTORS TO DISCHARGE INTO SILVER LANE BROOK

10.1.1 Condition 22 (Environment Agency & GMEU (Greater Manchester Ecology Unit) - Drainage): *The development shall not be commenced until a scheme to dispose of surface water and installation of oil and petrol interceptors and sediment traps has been submitted to, and approved in writing by, the local planning authority. For the avoidance of doubt, this should also include how the PHZ interacts (or does not) with the site drainage. Reason: To ensure that the proposed forecourt, roadway and car parking drainage does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework and Position Statement G of the 'The Environment Agency's approach to groundwater protection'.*

10.2 Surface water runoff from the Site would be managed using SuDS techniques to ensure discharge rate is maintained at the existing greenfield rate, and surface water storage provided as appropriate to balance storm event flows which exceed this discharge rate.

10.3 Proprietary SuDS treatments will be included into the surface water drainage through the use of bypass or full retention petrol interceptors that will be specified at detailed design stage.

10.4 The introduction of a positive drainage system within the site will remove risk to the groundwater as any overland flows generated will be collected and treated before discharging back into the Silver Lane Brook in a controlled manor.

10.5 Any permeable surfacing introduced into the design will be lined to prevent any infiltration into the ground below.

11 POSSIBLE DEWATERING OF EXCAVATIONS

11.1 It will be the site contractor's responsibility to keep the working area safe under the Health and Safety at Work Act. They will require a temporary environmental permit from the EA to discharge rainwater / groundwater from excavations into the existing Silver Lane Brook.

11.2 Appropriate measures will be implemented to ensure that the discharge meets the requirements of any limit set on the discharge permit (e.g. total suspended solids, pH and visible oil and grease).

12 GROUNDWATER MATTERS

12.1.1 The ES lists the following assessment conclusions, key design mitigation and environmental measures and:

- The Proposed Development will be undertaken in line with the current guidance and codes of best practice including CIRIA guidance and former PPGs.
- The Till (clay) that underlies the Site is likely to confine the Helsby Sandstone Formation aquifer affording it a level of protection from contamination.
- It is considered unlikely that a hydrogeological connection exists between the Site and the three hydro-ecologically designated sites in the vicinity of the Site.
- A Construction Environmental Management Plan (CEMP) will provide practical measures to avoid and minimise the impact of the Proposed Development on ground and surface waters in accordance with current best practice (Condition 13 and 32 require this, as confirmed within the Officer's Report to Committee and the General SoCG (CD1.2.11(a) and CD2.4.4) and a Framework CEMP was submitted as part of the Environmental Statement (CD2.5.2).
- In the operational phase, SuDS will ensure that the runoff from the site is limited to the Greenfield Runoff Rate, provide an initial level treatment of runoff through a mix of swales, channel drainage, rills and gullies. The surface water from paved areas will be passed through petrol interceptors/forecourt interceptors.

12.1.2 A Conceptual Site Model report (SH11739-RPT-019) (CD1.2.9(g)) was completed to establish the source, pathways and receptors for any contamination to address the concerns of the Environment Agency and support the ES with regard to risks to groundwater. The report presented the following:

- A Preliminary/Generic Risk Assessment that included simple hydrogeological calculations using the Environment Agency's 'P20' DQRA spreadsheet to determine the retarded travel times for the main contaminant of concern from the FFS, Benzene. For each scenario of receptor distance, the time frame greatly exceeded the EA guidance time of 1000 years beyond which no action is required.

- The recommendation that hydrogeological site investigation is needed to understand the geology, hydrogeology, groundwater levels and groundwater quality beneath the site prior to a DQRA being undertaken.

13 CONCLUSIONS

13.1.1 The ES assessed any potential effects of the Proposed Development on the Silver Lane Brook main river, Peat deposits on the site, the Helsby Sandstone Principal Aquifer and the groundwater (drinking water) Source Protection Zone 3 underlying the site. Hydro-ecologically designated sites within 5km of the Site include the Manchester Mosses Areas of Conservation SAC, Holcroft Moss SSSI and Risley Moss SSSI.

13.1.2 Extensive dialogue was undertaken with the Environment Agency including pre-application, scoping and other consultation meetings. Comments from the Environment Agency have been addressed through ES, clarifications, submission of further details and through the agreement of planning conditions during the consideration of the application by the Local Planning Authority.

13.1.3 An Addendum to the ES concluded that cumulative effects arising from HS2 and the Proposed Development are considered to be negligible.

13.1.4 A conceptual site model report provided a preliminary assessment of potential groundwater risk in relation to the Fuel Filling Station (FFS), which concluded that there is a low to negligible likelihood of risk of pollution occurring to controlled water from the fuel filling activities of the development.

13.1.5 Following the submission of the Water Resources ES chapter, an Addendum to the ES (covering cumulative effects); Conceptual Site Model report and revised WFD Screening Assessment, the Environment Agency considered the information provided to be sufficient to overcome their previous holding objections subject to conditions.

13.1.6 These conditions include Condition 22 (Environment Agency - Surface Water Drainage Scheme), Condition 23 (Environment Agency - Brook Diversion) and Condition 24 (Environment Agency - Brook Diversion). This document outlines that these will be addressed at the detailed design stage.

13.1.7 In relation to the occurrence of Peat at the Site, through the iterative design and consultation process the Proposed Development has been designed to maximise the area of undisturbed (avoided) peat. Soil and peat management within the Site will be

defined through a detailed site-specific Soil and Peat Management Plan (SPMP) produced by a qualified soil scientist (prior to construction) to ensure that the quality of the peat is maintained during construction and operation of the Site.

**DR03 - Cumulative Noise and Air Quality
Assessment of HS2 Ltd latest highways
estimates**

Technical Note

CLIENT:	Extra MSA
PROJECT:	Warrington MSA
SUBJECT:	Cumulative Noise Assessment of HS2 Ltd Latest Highway Traffic Estimates
JOB NO.:	LD10318
DATE:	11 th February 2022
PREPARED BY:	Richard Calvert, MIOA

- 1.1 This note for the Proposed Motorway Services Area at Junction 11 of the M62 Motorway, Warrington, has been prepared following the preparation of Wardell Armstrong's Noise and Vibration Environmental Statement (ES) Technical Paper (dated July 2019) for the Proposed MSA; the preparation of Wardell Armstrong's Addendum to the Noise and Vibration ES Technical Paper (dated December 2021 and submitted January 2022); and the publication of High Speed 2's (HS2) Environmental Statement (January 2022) as part of the Hybrid Bill (to support the Crewe to Manchester section of HS2, including the section between Risley and Bamfurlong). Volume 5 of the HS2 ES provides the Technical Appendices, including the Transport Assessment, from which Extra MSA's Highway Consultants, i-Transport, have provided the relevant data to Wardell Armstrong for consideration as part of the Noise Assessment.
- 1.2 Wardell Armstrong's Noise and Vibration ES Technical Paper (July 2019) assesses the potential noise impacts, resulting from the construction and operational phases of the scheme, at a number of existing noise sensitive receptors surrounding the site. The assessment included a consideration of road traffic noise impacts and relied upon traffic flow data.
- 1.3 Wardell Armstrong's Addendum to the ES Technical Paper considers noise and was prepared following receipt of traffic data in December 2021. This traffic data was based on an informed assumption of traffic flows associated with the construction phase of the HS2 development prepared by Extra MSA's Transport Consultant, i-Transport, and was used to update the cumulative assessment within the ES. This used first principles assumptions as to the likely construction traffic associated with

the HS2 construction phase within the vicinity of the Site, taking account of published information for Phase 1 of HS2 between London and the West Midlands.

- 1.4 HS2 is proposed to be constructed close to the east of the Proposed MSA site and will come forward following the construction of the MSA. Therefore, it has been assumed that HS2 construction traffic will access the HS2 construction compounds through the Proposed MSA site. A full project description of the proposed HS2 works assessed within the cumulative assessment is included within Chapter 9 of the ES Part 1 Addendum Report. An assumed programme of works for both the Proposed MSA and HS2 is included within the ES Addendum, along with HS2 Safeguarded Plans. The Safeguarded Plans are a series of plans showing the assumed access arrangements for HS2 within the Proposed MSA site and the Statement of Common Ground with HS2 (ES Part 1 Addendum, Appendices 14a-e).
- 1.5 Wardell Armstrong's ES Addendum Noise and Vibration ES Technical Paper (dated December 2021) demonstrates that the cumulative impact of the Proposed MSA and HS2 construction traffic would be negligible at all existing noise sensitive receptors.
- 1.6 Following the publication of HS2's Environmental Statement as part of the Hybrid Bill in January 2022, they have provided their estimate of the traffic flows associated with the construction of the HS2 railway line including the section between Risley and Bamfurlong. The traffic data within the HS2 ES has been compared with the December 2021 data, contained within the ES Addendum for the Warrington MSA cumulative assessment (submitted in January 2022), to determine any changes to the assessment and the significance of any changes. A comparison of the changes is provided below in Table 1.

Link Reference	Link	Warrington MSA ES Addendum (December 21 Data)			Provided by Extra's Transport Consultant (data from HS2 Hybrid Bill ES Traffic data, January 2022)			Comparison			
		2029 Base + Committed + MSA Development + HS2 Construction			2029 Base + Committed + MSA Development + HS2 Construction						
		18 Hour AWWT			18 Hour AWWT			Vehicle Change	% Vehicle Change	HDV Change	% HDV Change
		Vehicles	HDVs	%HDV	Vehicles	HDVs	%HDV				
1	M62 EB On-Slip	11045	1004	9%	11051	1005	9%	6	0%	1	0%
2	M62 WB Off-Slip	10648	937	9%	10654	938	9%	6	0%	1	0%
3	Birchwood Way	28467	2225	8%	28470	2225	8%	2	0%	0	0%
4	M62 WB On-Slip	12169	1303	11%	12190	1306	11%	21	0%	3	0%
5	M62 EB Off-Slip	9388	1224	13%	9409	1227	13%	21	0%	3	0%
6	Site Access	7998	1607	20%	8617	1984	23%	619	8%	377	23%
7	Eastern Circulatory	10183	1249	12%	10206	1252	12%	22	0%	3	0%
8	Western Circulatory	11841	1028	9%	11848	1029	9%	7	0%	1	0%
9	M62 Mainline East of J11	135450	21160	16%	135462	21162	16%	12	0%	2	0%
10	M62 Mainline Within J11	110236	17922	16%	110236	17922	16%	0	0%	0	0%
11	M62 Mainline West of J11	131792	20449	16%	131834	20455	16%	42	0%	6	0%
12	Silver Lane	563	369	66%	563	369	66%	0	0%	0	0%

1.7 As shown in Table 1, the only significant change is to site access HDV flows, which show a 23% increase over that which was previously modelled.

- 1.8 In the context of the traffic flows on the other roads, in particular the M62 Motorway, the number of vehicle movements on the site access road will be minimal.
- 1.9 To ensure that this review is robust, we have reassessed the development traffic flows at existing noise sensitive receptors, which is shown in Table 2 below and is an update to Table 7.29 in the Addendum to the Noise and Vibration ES Technical Paper (dated December 2021 and submitted January 2022).

Existing Sensitive Receptor Number	Predicted L10 18hour dB(A) at the façade of the Receptor			Long Term Change in Noise (Data from December 21 Data)	Long Term Change in Noise (Data from HS2 Hybrid Bill ES Traffic data, January 2022)
	Scenario 1	Scenario 6 (Data from December 21 Data)	Scenario 6 (Data from HS2 Hybrid Bill ES Traffic data, January 2022)		
ESR1	51.7	52.4	52.4	+0.7	+0.7
ESR2	51.8	52.4	52.4	+0.6	+0.6
ESR3	52.5	53.1	53.1	+0.6	+0.6
ESR4	61.5	62.3	62.3	+0.8	+0.8
ESR5	49.1	49.6	49.7	+0.4	+0.5

- 1.10 The reassessment shows that the change to the traffic data results in a change in noise level of up to 0.1dB at receptors. This change is nonmaterial.
- 1.11 Therefore, in conclusion, the estimated construction traffic data contained within the HS2 ES as part of the Hybrid Bill (dated January 2022) does not change the outcome of the noise assessments which have been undertaken to date as part of the cumulative assessment within the ES Addendum for the Proposed MSA Development.

Technical Note

CLIENT:	Extra MSA
PROJECT:	Warrington MSA
SUBJECT:	Cumulative Air Quality Assessment of HS2 Ltd Latest Highway Traffic Estimates
JOB NO.:	LD10318
DATE:	11 th February 2022
PREPARED BY:	Dr Paul Sanderson MIAQM MIEnvSc

- 1.1 This note for the Proposed Motorway Services Area at Junction 11 of the M62 Motorway, Warrington has been prepared following the preparation of Wardell Armstrong’s Air Quality, Odour and Dust Environmental Statement (ES) Technical Paper (dated July 2019) to support the Proposed MSA; the preparation of Wardell Armstrong’s Addendum to the Air Quality, Odour and Dust ES Technical Paper (dated December 2021 and submitted January 2022); and the publication of High Speed 2’s (HS2) Environmental Statement (January 2022) as part of the Hybrid Bill (to support the Crewe to Manchester section of HS2, including the section between Risley and Bamfurlong). Volume 5 of the HS2 ES provides the Technical Appendices including the Transport Assessment from which Extra MSA’s Highway Consultants, i-Transport have provided the relevant data for the purposes of Wardell Armstrong’s Air Quality Assessment.
- 1.2 Wardell Armstrong’s Air Quality, Odour and Dust ES Technical Paper (July 2019) assessed the potential impacts on air quality resulting from the construction and operational phases of the scheme at a number of existing sensitive receptors surrounding the site. The assessment included a consideration of road traffic emissions and relied upon traffic flow data provided by i-Transport.
- 1.3 Wardell Armstrong’s Addendum to the ES Technical Paper considers air quality and was prepared following receipt of traffic data in December 2021. This traffic data was based on an informed assumption of traffic flows associated with the construction phase of the HS2 development prepared by Extra MSA’s Transport Consultant, i-Transport and was used to update the cumulative assessment within the ES. This used first principles assumptions as to the likely construction traffic associated with the HS2 construction phase within the vicinity of the Site, taking account of published

information for Phase 1 of HS2 between London and the West Midlands. HS2 is proposed to be constructed close to the east of the Proposed MSA site and will come forward following the construction of the MSA. Therefore, it has been assumed that HS2 construction traffic will access the HS2 construction compounds through the Proposed MSA site. A full project description of the proposed HS2 works assessed within the cumulative assessment is included within Chapter 9 of the ES Part 1 Addendum Report. An assumed programme of works for both the Proposed MSA and HS2 is included within the ES Addendum, along with HS2 Safeguarded Plans, a series of plans showing the assumed access arrangements for HS2 within the Proposed MSA site and the Statement of Common Ground with HS2 (ES Part 1 Addendum, Appendices 14a-e).

- 1.4 Wardell Armstrong’s ES Addendum Air Quality, Odour and Dust ES Technical Paper (dated December 2021) demonstrates that the cumulative impact of the Proposed MSA and HS2 construction traffic would be negligible at all existing sensitive receptors for air quality. Following the publication of HS2’s Environmental Statement as part of the Hybrid Bill in January 2022, they have provided their estimate of the traffic flows associated with the construction of the HS2 railway line including the section between Risley and Bamfurlong. The traffic data within the HS2 ES has been compared with the December 2021 data contained within the ES Addendum for the Warrington MSA cumulative assessment (submitted in January 2022) to determine any changes to the assessment and the significance of any changes. A comparison of the changes is provided below in Table 1.

Table 1: Comparison of Traffic Data Flows

Link Reference	Link	December 21 Data			February 22 Data			Comparison			
		2029 Base + Committed + MSA Development + HS2 Construction			2029 Base + Committed + MSA Development + HS2 Construction						
		24 Hour AADT			24 Hour AADT			Vehicle Change	% Vehicle Change	HDV Change	% HDV Change
		Vehicles	HDVs	%HDV	Vehicles	HDVs	%HDV				
1	M62 EB On-Slip	9,999	1,011	10%	10,004	1,012	10%	5	0%	1	0%

Table 1: Comparison of Traffic Data Flows

Link Reference	Link	December 21 Data			February 22 Data			Comparison			
		2029 Base + Committed + MSA Development + HS2 Construction			2029 Base + Committed + MSA Development + HS2 Construction						
		24 Hour AADT			24 Hour AADT						
		Vehicles	HDVs	%HDV	Vehicles	HDVs	%HDV	Vehicle Change	% Vehicle Change	HDV Change	% HDV Change
2	M62 WB Off-Slip	9,851	952	10%	9,856	953	10%	5	0%	1	0%
3	Birchwood Way	24,560	1,907	8%	24,562	1,907	8%	2	0%	0	0%
4	M62 WB On-Slip	10,906	1,229	11%	10,924	1,231	11%	18	0%	2	0%
5	M62 EB Off-Slip	8,758	1,188	14%	8,776	1,191	14%	18	0%	2	0%
6	Site Access	16,479	1,936	12%	16,982	2,232	13%	504	3%	296	15%
7	Eastern Circulatory	9,601	1,202	13%	9,619	1,205	13%	19	0%	2	0%
8	Western Circulatory	10,842	1,025	9%	10,848	1,026	9%	6	0%	1	0%
9	M62 Mainline East of J11	126,214	17,676	14%	126,223	17,677	14%	10	0%	1	0%
10	M62 Mainline Within J11	106,363	15,712	15%	106,363	15,712	15%	0	0%	0	0%
11	M62 Mainline West of J11	126,027	18,129	14%	126,063	18,134	14%	36	0%	5	0%
12	Silver Lane	456	290	64%	456	290	64%	0	0%	0	0%

1.5 As shown in the comparison of the traffic data, the changes are small, with the exception of the site access, which experiences a 3% increase in total vehicles and a 15% increase in HGV numbers.

1.6 However, in the context of the flows on the other roads, such as the M62 Motorway, the change to the site access movements is small. Moreover, taking into consideration that the sensitive receptors for the air quality assessment are south of the motorway junction and therefore some distance from the site access, and that the predicted

pollutant concentrations are well below objectives, it is considered that any change would be small and would not affect the conclusions of the assessment.

- 1.7 However, to ensure that this review is robust, the revised traffic data has been used to update the air quality model. The remodelling exercise confirms that the changes in concentrations of NO₂, PM₁₀ and PM_{2.5} a result of the updated traffic flows is still less than 0.5% of the relevant air quality objectives and target levels at both existing receptor locations assessed, and that absolute concentrations remain below the annual mean objectives and target levels. The data are presented in Tables 2 – 4 below. This level of change is classed as “negligible” under the applicable IAQM guidance, and therefore it can be concluded that the overall impact of the development remains “not significant” as was previously concluded within the ES Addendum.

Table 2: Predicted Unadjusted NO₂ Concentrations at Existing Sensitive Receptors – Using the Emission Factor Toolkit v9					
Receptor	Calculated Annual Mean NO ₂ Concentrations (µg/m ³) [†]				
	Without Development	With Development		Concentration Change as Percentage of AQAL	Impact *
		Concentration	Percentage in Relation to AQAL		
2022-2029					
ESR 1	24.32	24.39	<75%	<0.5%	Negligible
ESR 2	24.12	24.21	<75%	<0.5%	Negligible

[†] NO₂ concentrations obtained by inputting predicted NO_x concentrations into the NO_x to NO₂ calculator in accordance with LAQM.TG(16)
^{*} Assessed using the Impact Descriptors from the EPUK/IAQM guidance, detailed in Table 2.9. Changes of less than 0.5% should be described as negligible

Table 3: Predicted Unadjusted PM₁₀ Concentrations at Existing Sensitive Receptors – Using the Emission Factor Toolkit v9					
Receptor	Calculated Annual Mean NO ₂ Concentrations (µg/m ³)				
	Without Development	With Development		Concentration Change as Percentage of AQAL	Impact *
		Concentration	Percentage in Relation to AQAL		
2022-2029					
ESR 1	14.09	14.10	<75%	<0.5%	Negligible
ESR 2	14.05	14.07	<75%	<0.5%	Negligible

Table 3: Predicted Unadjusted PM ₁₀ Concentrations at Existing Sensitive Receptors – Using the Emission Factor Toolkit v9					
Receptor	Calculated Annual Mean NO ₂ Concentrations (µg/m ³)				
	Without Development	With Development		Concentration Change as Percentage of AQAL	Impact *
		Concentration	Percentage in Relation to AQAL		
* Assessed using the Impact Descriptors from the EPUK/IAQM guidance, detailed in Table 2.9. Changes of less than 0.5% should be described as negligible					

Table 4: Predicted Unadjusted PM _{2.5} Concentrations at Existing Sensitive Receptors – Using the Emission Factor Toolkit v9					
Receptor	Calculated Annual Mean PM _{2.5} Concentrations (µg/m ³)				
	Without Development	With Development		Concentration Change as Percentage of AQAL	Impact *
		Concentration	Percentage in Relation to AQAL		
2022-2029					
ESR 1	8.81	8.82	<75%	<0.5%	Negligible
ESR 2	8.79	8.80	<75%	<0.5%	Negligible
* Assessed using the Impact Descriptors from the EPUK/IAQM guidance, detailed in Table 2.9. Changes of less than 0.5% should be described as negligible					

1.8 Therefore, in conclusion, the estimated construction traffic data contained within the HS2 ES as part of the Hybrid Bill (dated January 2022) does not change the outcome of the air quality assessments which have been undertaken to date as part of the cumulative assessment within the ES Addendum for the Proposed MSA Development.

**DR04 - Summary of Assessment of Retail,
Food and Drink and Hotel uses (including
Hotel Provision Update)**

DR04: Summary on Retail, Food and Drink and Hotel Uses (Including a separate Hotel Provision Update) - Warrington MSA

- 1.1. This Summary Note sets out the background information for the consideration of retail, food and drink and hotel uses within the Appeal Scheme, and demonstrates the robustness of the approach taken. The Replacement Planning Statement (CD1.2.3) provides the full description of the Appeal Proposal. This Summary Note is concerned with those elements which include retail and town centre uses.
- 1.2. The Summary Note is set out as follows:
- Part 1 will address the use class of MSAs, the need for disaggregation and compliance with the Development Plan and NPPF 21, with specific regards to the need for a Sequential Test and Impact Assessment;
 - Part 2 will cover matters relating to MSA requirements;
 - Part 3 will focus on the Facilities Building. It will identify the extent of retail floorspace within the facilities building, the compliance with the Development Plan and NPPF 21 and the proposed conditions;
 - Part 4 focuses on the Petrol Filling Station (PFS), and will cover matters relating to the accepted use class, the need for disaggregation and compliance with the Development Plan and NPPF 21;
 - Part 5 relates to the Hotel provision and discusses the nature and scale of provision, the approach to assessment and proposed conditions; and
 - Part 6 forms the Conclusion.
- 1.3. The table below sets out the key documents that are relevant to this note.

CD Ref:	Date	Document	Comments
CD1.2.3	6/1/2020	Replacement Planning Statement	Sets out the Planning Justification and includes assessment of the town centre uses.
CD1.2.10(e)	14/5/2020	Letter from Spawforths to WBC	Provides clarification on the scale of retail floorspace and hotel provision within the MSA.
CD1.2.10(a)	25/9/2020	Letter from Spawforths to WBC	Provides further clarification on the overall amount of commercial floorspace within the MSA.
CD1.2.10(d)	26/11/2020	Spawforths Letter to WBC	Provides a response to matters raised by Culcheth and Glazebury Parish Council.
CD1.2.11(a)	1/6/2021	Officer Report to Development Management Committee	
CD1.2.11(b)	9/6/2021	Update Report to Development Management Committee	
CD6.1	4/2/2022	Hotel Study	Forms part of appendix DR04, to the Planning Proof of Evidence.

Part I Background, MSAs and Use Classes

- I.4. The Replacement Planning Statement (CDI.2.3) and ES Part I (CDI.1.34) provide the description of the Appeal proposals, and consider the relevant policies contained within the adopted Development Plan. The Planning Statement (CDI.1.20), identified the following policies as relevant: Policy CS2, with regards to Town Centres, and the control of inappropriate out of centre retail development; and Policies PV4, PV5, and SN5, in relation to the requirements for sequential test and impact assessment (Paragraph 7.28, and 7.32 of the Planning Statement, CDI.1.20). Paragraph 7.45 of the Planning Statement (CDI.1.20) confirms that Section 7 of the 2019 Framework¹, 'Ensuring the vitality of town centres' is relevant to the Appeal proposals. Paragraph 7.9 also refers to the 02/2013 Circular, and the guidance contained therein with respect of retail activities, hotels and conference centres. The Planning Statement (CDI.1.20), paragraph 12.1 considers the potential for a condition to control maximum floor areas.
- I.5. In January 2020 a Replacement Planning Statement was produced (CDI.2.3), this provided the planning justification in an alternative format in response to Officer's requirements. Importantly, with respect to Town Centre uses, part 3 of Section 7 considered the Appeal proposals in the context of national policy on town centre uses. This consideration is contained within paragraphs 7.233 to 7.277.

Use Class

- I.6. The Replacement Planning Statement (CDI.2.3) highlights the definition of Main Town Centre Uses, as set out within Annex 2 of the NPPF (CD3.1.1). The Replacement Planning Statement confirms within paragraph 7.233 -7.234 that an MSA does not constitute a town centre use.

¹ Section 7 'Ensuring the vitality of town centres', was not subject to review, and the respective text remains within the NPPF, published July 2021

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Figure 1.1 Extract of Annex 2, NPPF, July 2021

- 1.7. An MSA is **sui generis** as stated in the Replacement Planning Statement (CD1.2.3), which confirms that each element of the MSA does not operate as a separate entity in respect to the Use Class Order, and hence they do not form separate planning units. The Local Planning Authority sought additional clarification on the nature of use at the Appeal proposal and this was provided by Spawforths in a letter dated 14th May 2020 (CD1.2.10 (e)). The letter confirmed that the primary purpose of an MSA is to provide services and facilities for motorists using the motorways, and hence the classification of an MSA is sui generis. The letter confirmed that the retail provision within the MSA is not a stand-alone AI use (now Use Class E (a)), but ancillary to the main sui generis MSA use. It also confirmed that this applies to the food and drink elements. These are complementary uses within the MSA, as part of a range of facilities, designed to be attractive to motorway users and conducive to encouraging the travelling person to stop. The Local Planning Authority accept that the use is sui generis as set out in paragraph 9.5 of the Officer Report to Planning Committee (CD1.2.11 (a)).

Disaggregation, Flexibility and the Appellant's Business Model

- 1.8. At the request of the Planning Authority, the Replacement Planning Statement (CD1.2.3) considered the need for disaggregation and flexibility within the Appellant's business model (paragraphs 7.245 to 7.258). The Replacement Planning Statement reviewed planning judgements and decisions in this regard². It confirmed that it has

² The Supreme Court Judgment - Tesco Stores Ltd v. Dundee City Council (21st March 2012) UKSC13;
High Court R (on the application of Zurich Assurance Ltd (t/a Threadneedle Property Investments)) v North Lincolnshire Council [2012] EWHC 3708 (Admin);

been widely accepted by the Courts, Secretary of State and Inspectors that it is not the purpose of national policy to require development to be split onto separate sites where this does not form part of the developers business model and where flexibility on issues such as format and scale have been demonstrated.

1.9. The Replacement Planning Statement (paragraphs 7.246-7.247) sets out the specific locational requirements for an MSA and also the minimum requirements for MSAs (paragraph 7.237). The nature of the Appellant's business model with regard to the format of MSAs is set out within paragraphs 7.249 and 7.250. This confirms that Extra MSA Group has developed a 'new concept' approach to MSAs to raise and drive standards in MSAs, focusing on: world class design; good quality and popular range of complementary ancillary food, retail, business, leisure and hotel facilities; and a bright spacious and comfortable building in an attractive and relaxing environment to meet modern day customer requirements. Extra MSA Group does not operate standalone cafes, restaurants, convenience stores, hotels or fuel filling stations. The Replacement Planning Statement (CD1.2.3) indicates how the MSA requirements, business model and customer expectations translate into the Appeal Scheme.

- A Facilities Building (approx. 3,000 sq. m of food court and ancillary retail space, incorporating facilities for the sale and consumption of hot and cold food and beverages on and off the premises, free toilet and washing facilities for all drivers, and disabled visitors, along with showers and washing for HGV drivers. Staff areas including kitchen, catering, storage, staff rooms, retail storage, refuse areas and office space).

Secretary of State's decision of 11th June 2014 in relation to the application by LXB RP (RUSHDEN) Limited on Land adjacent to Skew Bridge ski slope, Northampton Road, Rushden (APP/G2815/V/12/2190175).

- A Budget Hotel Providing up to 100 bedrooms with supporting ancillary uses. The Hotel will provide hotel beds for predominantly road users on long journeys.
- Fuel filling Station,
- Parking Facilities for all types of vehicle.
- Outdoor play areas, landscaping and outdoor seating areas.

1.10. The Replacement Planning Statement concluded in Paragraph 7.258 that it is not feasible, or realistic to split elements of the scheme across several sites. Fundamentally, there is no policy requirement to do so. In order to satisfy the MSA requirements, customer expectations, and operational needs, the MSA proposal needs to be considered within its entirety. This was accepted by Officers who subsequently concluded that a Sequential Test was not considered necessary (paragraph 8.63 and paragraph 8.70 of the Officers Report to Planning Committee (CD 1.2.11(a))).

Sequential Test.

1.11. The Appellant was requested to consider the need for a sequential test and impact assessment for the Appeal Scheme. This Appellant's response was set out within the Replacement Planning Statement (CD1.2.3) and within a letter to WBC on 14th May 2020, (CD1.2.10 (e)). Paragraph 87 of the NPPF (21) states that 'local planning authorities should apply a sequential test to planning applications for 'main town centre uses''. Annex 2 of the NPPF (21) defines main town centre uses and this does not include an MSA use, which is sui generis.

1.12. Since an MSA's purpose is to serve the travelling public it follows that it must be located directly adjacent to the Strategic Road Network. The elements of retail and food and drink within it are ancillary to the MSA, as set out in the letter, dated 14th May 2020 (CD1.2.10 (e)). Accordingly, it was concluded that a **sequential test is not required and is not appropriate**. Notwithstanding this, the Replacement

Planning Statement (CD1.2.3) provided further justification for this conclusion having regard to the specific locational requirements of an MSA. As it was concluded that there was no scope for disaggregation or flexibility for an MSA, then the sequential analysis was considered on the basis that **sites would need to accommodate the Appeal Scheme proposals in their entirety.**

I.13. The Replacement Planning Statement (CD1.2.3) states that it is not appropriate to locate an MSA within a town centre location (paragraph 7.259) as in order to meet the functional requirements of an MSA, they need to be located online, directly adjacent to the Motorway, or share a common boundary with the highway at an existing junction (Circular 02/2013, paragraph B13 and B15 (CD3.1.3 (dd))). The Appeal Scheme is designed to respond to four identified gaps within the network of MSAs on the Strategic Road Network (SRN), as set out in Mr Jones's Evidence. The Replacement Planning Statement (CD 1.2.3, paragraph 7.262), confirms that there are no defined centres within at least 1 mile of the Appeal Site, and that the Motorway does not run through or immediately adjacent to any of the defined centres within the optimal search area/catchment area. Even if it was deemed necessary to carry out a sequential test, the Replacement Planning Statement (paragraph 7.263) confirmed that **there are no sequentially preferable sites, within or on the edge of any defined centres.**

I.14. The Replacement Planning Statement recognised that with regards to out of centre sites, the NPPF (21) gives preference to accessible and well connected sites. The ASA and Comparative Assessment Update of Alternative Sites (CD1.1.21 and CD 6.1) consider the potential alternative sites that fall within the catchment, defined by the 'optimal search area'. This concludes that the Appeal Site is the most sequentially preferable, having regard to the locational requirements, environmental, planning, engineering constraints and timing of delivery. Accordingly, the Replacement Planning Statement (CD1.2.3) confirmed that **there are no more sequentially preferable locations upon which the proposed development could be accommodated.** The Appeal scheme is therefore in accordance with Policies PV4 and PV5 of the

adopted Local Plan Core Strategy, and consistent with paragraphs 87 -91 of NPPF (21).

- I.15. The Officers Report to Development Management Committee (CDI.2.11 (a)) confirmed that the proposed retail floorspace is proportionate and integral to the requirements of an MSA; that a sequential test is not required, (paragraph 8.63) and that *“in relation to the food and drink uses that will occupy a significant element of the amenity building, it is accepted that this is a key component of an attractive MSA having regard to provision at other existing facilities. On this basis it is not considered that sequential test or impact assessment is required due to the specific nature of the development”* (paragraph 8.70).

Retail Impact Assessment

- I.16. The NPPF (21), paragraph 90, requires an impact assessment for retail and leisure uses over a locally set threshold, or 2,500 sq. m, when such development is located outside town centres. Policy PV5 establishes a local threshold of 500 sq. m. PPG confirms that impact assessments should be undertaken on a like for like basis and confirms that planning conditions can be used to control the impact of a particular use (paragraph 015 Reference ID 2b-015-20190722). It also confirms that impacts should be undertaken in a proportionate and locally appropriate way. (Paragraph 017 Reference ID 2b-017-20190722).
- I.17. Since the **retail and food and drink uses are ancillary to the MSA**, then there is **no policy requirement for an impact assessment**. A hotel does not fall within the definition of Leisure (within Annex 2 of the NPPF (21)) and hence there is no national policy requirement for an impact assessment for hotels (paragraph 90 of the NPPF (21)). Notwithstanding this, in response to a request from the Local Planning Authority, the Replacement Planning Statement (CDI.2.3) addressed the issue in more detail (paragraphs 7.267 to 7.257). This confirmed that MSAs are intended to serve the travelling public and therefore serve a niche market. Correspondingly, the turnover for the Appeal Scheme will be derived from expenditure generated from dispersed locations across a geographically large area. Purchases at MSAs will be in

response to needs generated by a specific journey. The Replacement Planning Statement (paragraph 7.269) set out the impracticalities of attempting to identify where trade diversion will occur as Motorway users do not tend to drive substantial distances away from the motorway when on a journey, in order to use facilities within the defined centres. Furthermore, the Replacement Planning Statement (paragraph 7.271) confirmed that the MSA will not provide facilities to undertake a weekly shop. It also confirmed that as other MSAs are located on the SRN and not within a defined town or district centre then they are not afforded protection by the planning system in retail terms. The Replacement Planning Statement concluded that there is no national or local policy requirement to undertake an impact assessment, and that there are significant impracticalities of doing so, but that it was logical to conclude that there will be **no significant adverse retail impact on any defined centre**. It was concluded therefore that the Appeal proposal is in accordance with paragraph 90 of the NPPF (21) and Policy PV5 of the Core Strategy.

- 1.18. Consideration was also given to whether the MSA may become a destination in its own right for the occupiers of the neighbouring residential development such as Gorse Covert, with the potential to divert trade from Birchwood Local Centre. The potential to divert trade from Birchwood Local Centre was considered further in the response to WBC on 14th May 2020 (CD1.2.10 (e)). Reference was made to the WBC Retail and Leisure Study Update 2019, by Nexus Planning, which indicated that Birchwood Local Centre is performing well, anchored by a large Asda superstore, with a range of national retailers, food and drink outlets, and a range of community facilities including, medical centre, dental surgery, and public transport options including Birchwood Railway Station. It highlighted that the offer at the Birchwood Local Centre differed significantly from the offer provided within the Appeal proposal and hence the Appeal Scheme would not compete with Birchwood in terms of the nature of goods sold, and the facilities that it contains.
- 1.19. The Officers Report to Committee (CD1.2.11 (a)) concluded that the retail floorspace within the Appeal scheme would be below the threshold in policy PV5 which requires an impact assessment to be undertaken. It concluded that there would

be “no significant impact upon the vitality and viability of Birchwood Town Centre (the nearest district centre to the application) would arise from the proposal” (paragraph 8.62). The Officers Report includes a condition limiting the retail floorspace to a maximum of 500 sq. m within the Facilities Building. Paragraph 8.69 of the Officers Report also assessed the retail provision at the Fuel Filling Station forecourt and concluded that it is ancillary to the Fuel Filling Station and also to the wider MSA and hence an impact assessment is not required. Paragraph 8.70 of the Officer Report CDI.2.11 (a) confirmed “in relation to the food and drink uses that will occupy a significant element of the amenity building, it is accepted that this is a key component of an attractive MSA having regard to provision at other existing facilities. On this basis it is not considered that sequential test or impact assessment is required due to the specific nature of the development”

1.20. The following conditions are included in order to control the impact of the Appeal Scheme:

“Condition 9: Within the amenities building there shall be a maximum of 500 sq. m retail floor space.

Reason: In accordance with the submitted application and having regard to Local Plan policy PV5.

Condition 10: The development hereby permitted shall not exceed the total quantum of development as detailed below:

- Amenity Building containing no more than 4,500 sq. m gross internal floorspace;
- Fuel Filling Station and Ancillary Forecourt Shop (maximum 450 square meters of gross internal floorspace)
- Hotel containing up to 100 bed spaces.

Reason: In accordance with the submitted application having regard to policy PV5 and CSS”

Part 2 MSA requirements

- I.21. Circular 02/2013 (CD3.1.3 (dd)) paragraph B4 identifies that the role of MSAs is to improve road safety and provide an opportunity for the traveling public to stop and take a break. Paragraph B13 confirms that there is a need for MSAs to be sufficiently attractive and conducive to encourage drivers to stop and take a break. The requirements for MSAs are established in Table B1 (extract below).

Table B1: Minimum requirements for the various types of roadside facility that may be eligible for signing from the strategic road network

Minimum requirements to be eligible for signing M= Mandatory P = Permitted	Motorway		APTR service area *	Truckstops on Motorways	Truckstops signed from SRN #	Truckstops on All-Purpose Trunk roads
	Service Area	Rest Area				
Open 24 hrs a day 365 days a year	M	M	N/A	M	N/A	N/A
Open minimum 12 hours per day between 8am and 8pm every day except Christmas Day, Boxing Day and New Year's Day.	N/A	N/A	M	N/A	M	M
Free parking for up to 2 hours minimum for all vehicles permitted to use the road served by the facility.(see schedule 1)	M	M	M	M	M	M
Free toilets/hand washing facilities with no need to make a purchase.	M	M	M	M	M	M
Shower and washing facilities for HGV drivers, including secure lockers in the shower/washing area.	M	P	P	M	M	M
Fuel	M	P	M	M	P	P
Hot drinks and hot food available at all opening hours for consumption on the premises.	M	P	P	M	P	P
Hot drinks and hot food available 8am to 8pm for consumption on the premises.	N/A	P	M	N/A	M	M
Access to a cash operated telephone.	M	M	M	M	M	M
Use as an operating centre for the purposes of the Goods Vehicles (Licensing of Operators) Act 1995 or the Public Passenger Vehicles Act 1981.	Prohibited	Prohibited	Prohibited	Prohibited	P	P

Figure I.2 Extract: Table B1 Circular 02/2013

- I.22. The Replacement Planning Statement (CD1.2.3 paragraph 7.237) confirms that the mandatory requirements include the need for hot drinks and hot food available at all opening hours, for the consumption on the premises, and that in order to serve the travelling public it is expected that MSAs provide a choice and range of different food outlets and retail opportunities. The Replacement Planning Statement (paragraph 7.238) highlights the acceptance of retail facilities as part of an MSA (extract from Circular 02/2013 (CD3.1.3 (dd)) below) and that hotel provision can also form part of the MSA provision.

RETAIL ACTIVITIES

- B29. The scope and scale of retail activities at roadside facilities is a matter for consideration by the relevant local planning authority in line with the National Planning Policy Framework and local planning policies. However, local planning authorities should have regard to the primary function of roadside facilities which is to support the safety and welfare of the road user.

Figure I.3 Extract from Circular 02/2013 CD3.1.3 (dd)

- I.23. The letter of the 14th May (CD1.2.10 (e)), reviewed the Appeal Scheme, in the context of the above paragraphs, and confirmed that commercial provision within an MSA is centred around the delivery of hot food and drink for consumption on the premises, and that an element of retail and an appropriately sized hotel are important components of a modern MSA. The letter to WBC on 14th May 2020, (CD 1.2.10(e)) confirmed that the scale and scope of facilities provided at the MSA are consistent with MSA provision across the country, including within Green Belt locations. A subsequent letter to WBC on 25th September 2020 (CD1.2.10 (a)) considered the factors that attract motorists to visit an MSA and take a break on their journey. This references the Motorway Services User Survey 2019, by Transport Focus which highlighted the areas for improvement:

“Offering greater variety, more healthy choices and products suitable for those with food allergies or intolerances. The price of goods was another frequently mentioned area for improvement and also tended to be a lower-rated aspect. There were suggestions for improving toilets; these ranged from day-to-day issues of cleanliness and upkeep to more

substantial concerns regarding the fixtures and maintenance. There were a number of comments about the main MSA building, suggesting a wide range of potential improvements, for example, to seating, layout and temperature. However, this was also a subject that prompted many positive comments with visitors appreciating where investment had been made and buildings redeveloped. The impression of the building, along with the toilets and the range and quality of food and drink are important influencers of how satisfied visitors are overall.”

- 1.24. This confirmed that offering a wide and diverse selection of food is important to an MSA offer, and a critical factor in attracting motorists and encouraging them to take a break on their journey - a key objective of MSAs in order to support the safety and welfare of road users. Extra MSA Group business model responds to the established requirements, and customer demands, and together these have informed the format and scale of the Appeal Scheme.
- 1.25. The Officers Report to Committee (CD1.2.11 (a)) confirmed acceptance that the retail floorspace proposed is considered to be proportionate and integral to the requirements of an MSA (paragraph 8.63) and that “*the limit to the retail floorspace and the likely food and drink offer would be of a scale and nature that is reasonable in relation to its function as a roadside facility*” paragraph 8.66.

Part 3 Facilities Building

- 1.26. The Replacement Planning Statement (CD1.2.3) confirmed that the maximum Gross Internal Area of the Facilities Building will be 5,000 sq. m. The Development Cell parameters establish the maximum building heights (maximum building height 15 m with +2m tolerance). It confirmed that this would comprise: approx. 3,000 sq. m of food court and ancillary retail space, incorporating facilities for the sale and consumption of hot and cold food and beverages on and off the premises; free toilet and washing facilities for all drivers, and disabled visitors; and showers and washing for HGV drivers; and staff areas including kitchen, catering, storage, staff rooms, retail storage, refuse areas and office space, paragraph 7.250.

I.27. To support the consideration of the scale of retail, food and drink and hotel provision proposed at the Appeal Site, Spawforths analysed a sample of MSAs across England assessing the nature of food and drink provision, the amount of retail floor space provision, and the size of hotels. This was provided within table A and table B of the letter of 14th May 2020 (CD1.2.10 (e)), an extract is provided in Annex I. This confirmed that the quantum of retail floorspace within the proposed Facilities Building within the Appeal proposal would be a maximum of 465 sq. m. The tables confirmed the average amount of retail floorspace within MSAs was circa 1,272 sq. m across both the facilities building and fuel filling station. The average number of hotel bedrooms provided at MSAs was 97. Table A demonstrated that MSAs provide a diverse and large range of food and drink outlets as well as retail outlets. The scale and type of retail floorspace proposed at the Appeal proposal is consistent with other MSAs across the country, including at Green Belt locations.

I.28. Subsequently, further clarification was provided of the commercial floorspace within the Facilities Building (letter to WBC on 25 September 2020 (CD1.2.10 (a))). The maximum of 5,000 square meters of Gross Internal Area was confirmed along with a broad split of floorspace below:

Component	Maximum Amount of Floorspace (indicative)
Floorspace dedicated to the production and sale of food and drink	Approx. 2,200 square metres
Floorspace dedicated to retail uses	Approx. 500 square metres
Floorspace dedicated to communal seating and circulation areas	Approx. 1,000 square metres
Floorspace dedicated to customer facilities including toilets, showers etc.	Approx. 300 square metres
Floorspace dedicated to customer's business facilities	Approx. 350 square metres

Floorspace for gaming (Amusements)	Approx. 100 square metres
Floorspace for staff facilities	Approximately 350 square metres
Floorspace for plant	Approximately 100 square metres
Miscellaneous Floorspace	Approximately 100 square metres

1.29. The letter dated 25th September 2020, (CDI.2.10 (a)), confirmed that it was envisaged that the food and drink floorspace would be spread across 8 units and 4 kiosks i.e. 12 outlets. The letter confirmed the average number of outlets at MSAs constructed since 1990 was around 9 outlets. The most recent MSAs at Beaconsfield and Cobham have 14 outlets. This aligns with the findings of the 2019 customer survey and confirms that the provision at the Appeal Scheme is consistent with provision at other MSAs within the Green Belt.

1.30. This scale of Facilities Building is consistent with that proposed in the appeal for an MSA at Doncaster (reference: APP/F4410/W/18/3197290), which was also in the Green Belt, which proposed an Amenity Building (3,959 sq. m), and a drive through coffee unit (205 sq. m). In respect to the scale of the proposal, the Planning Inspectorate concluded that:

“With regard to purpose (e), should a need for an MSA be established, then it would be entirely appropriate for it to offer the range of facilities normally to be expected at such an establishment. There is nothing about the scale or range of facilities proposed that would set it apart from other MSAs or that would suggest that it would become attractive as a destination in its own right.” Paragraph 204

1.31. Following further discussion between the Appellant and the Council, and in order to ensure that overall quantum of floorspace was the minimum required to meet the requirements of the Circular, including the objective to ensure that the facilities were attractive enough to encourage the road user to stop and rest, it was agreed that the

maximum floorspace of the facilities building would be no more than 4,500 sq. m. The retail floorspace within the facilities be would be controlled to a maximum of 500 sq. m.

I.32. In a letter to WBC dated 26th November 2020 (CD1.2.10 (d)), in response to comments on behalf of Culcheth and Glazebury Parish Council and Croft Parish Council. It was confirmed that the Facilities building would not provide any business or community facilities.

I.33. The Officers Report to Committee erroneously referred to the Facilities Building being 17,000 square meters, paragraph 8.60. This was corrected within the Update Report to state, Food and Drink Sales would be approx. 2,200 sq. m. Paragraph 8.62 of the Officers Report to Committee considered, subject to a condition limiting retail floor space to a maximum of 500 sq. m, that there would be no significant adverse impact upon the vitality and viability of Birchwood centre. Paragraph 8.63 confirmed that the retail floor space is considered to be proportionate and integral to the requirements of a MSA and in relation to the potential for the MSA to become a destination in its own right stated *“this is not considered to be the case, and whilst it would be accessible to people living within the wider area the limit to the retail floorspace and the likely food and drink offer would be of a scale and nature that is reasonable in relation to its function as a road side facility. On balance, it is not considered likely to attract significant visitors beyond the intended motorway users”*.

I.34. A condition is proposed within the Officers Report to Committee to control the impact of the Appeal Scheme.

“Condition 9: Within the amenities building there shall be a maximum of 500 sq. m retail floor space.

Reason: In accordance with the submitted application and having regard to Local Plan policy PV5.

Condition 10: The development hereby permitted shall not exceed the total quantum of development as detailed below:

- *Amenity Building containing no more than 4,500 sq. m gross internal floorspace;*
- *Fuel Filling Station and Ancillary Forecourt Shop (maximum 450 square meters of gross internal floorspace)*
- *Hotel containing up to 100 bed spaces”.*

I.35. This is agreed with the Appellant and justified above.

Part 4 Petrol Filling Station (PFS)

I.36. The maximum Gross Internal Area of the Fuel Filling Station (FFS) forecourt shop, will be 500 sq. m. The Development Cell Parameters establish the maximum heights for the Fuel Filling station (maximum 6.5 m with +2m tolerance).

I.37. Table B of the letter of 14th May 2020 (CDI.2.10 (e)) (extract provided in Annex 1) includes analysis of the scale of retail provision at a range of MSAs across the country. This confirmed that the quantum of retail floorspace within the fuel filling station at the Appeal Scheme would be a **maximum of 428 sq. m**. Table B of the letter confirms that this is consistent with the range of scale of retail provision at fuel filling stations within the assessed MSAs. The Officers Report to Committee (CDI.2.11 (a)) accepted that the retail element of the fuel filling station is ancillary to the Appeal Scheme and paragraph 8.69 confirms “*This is an expected feature of a PFS at motorway services. It is considered that this is ancillary to the main use of the PFS within the wider site and is also below the threshold set within Policy PV5 to require an impact assessment*”.

Part 5 Hotel

I.38. The Planning Statement (CDI.1.20) provided the description of development and confirmed that the hotel will be a maximum of 100 bedrooms, this is consistent with the planning application description which states “*up to 100 bedroom hotel*”. The Development Cell parameter establishes the maximum building heights (maximum building height 15 m with +2m tolerance). The Replacement Planning Statement (CDI.2.3) paragraphs 7.240 and 7.241, provided some analysis of MSAs with Hotels.

This has now been updated in the attached Appendix 01, which deals specifically with hotels.

- I.39. Paragraphs B30 to B32 of the Circular 02/2013 (CD3.1.3 (dd)) below, allow for provision of hotels at MSAs.

HOTELS, CONFERENCE CENTRES AND BUSINESS CENTRES

- B30. Such development will be a matter for consideration by the relevant local planning authority in line with the National Planning Policy Framework and local planning policies.
- B31. As a statutory consultee to such proposals, the Highways Agency will not object to the provision of hotels; conference centres; and business centres at the sites of roadside facilities for motorists unless there would be demonstrable adverse impact on the safety and/or operation of the strategic road network such as a net increase in travel.
- B32. Separate parking must be provided to service such developments so as to avoid any reduction in the general parking provision available to other road users.

- I.40. The Replacement Planning Statement (paragraph 7.240) confirmed that the proposed hotel will offer basic accommodation, and there would be no communal lounge or bar and no conference room facilities. The hotel is aimed at catering for motorway drivers on long journeys in need of a break, and not at attempting to attract visitors to the area who would be looking for hotels in a more inviting environment with a better range of facilities.

- I.41. Further clarification in terms of the scale of the hotel proposal is provided in the letter to WBC on 14th May 2020 (CD1.2.10 (e)). This confirmed that the Hotel would accommodate up to 100 bed spaces. The Building Regulations defines a bed space as “*a suitable sleeping area for one person*” (Building Regulations Approved Document M Volume 1). Adopting this definition will ensure that the Appeal proposals are consistent with HSE guidance relating to the number of bed spaces that can be developed within the Middle Zone (paragraph 35 and Table 2, HSE’s Land Use Planning Methodology).

- I.42. The appended Hotel Update Study provides further analysis of hotel provision at MSAs across England, including MSAs within the Green Belt. It concludes that Hotels are an accepted and permitted facility at MSAs. National Highways have confirmed that they consider a hotel to be an accepted and permitted element of an MSA serving the safety and welfare needs of road users within the Statement of Common Ground, 15th November 2021 (CD2.4.2).
- I.43. The Officers Report to Committee (CDI.2.11 (a)) (paragraph 8.68) confirmed that *“The proposed hotel at Warrington MSA would offer nothing but basic bedroom accommodation and that there would be no communal lounge or bar and no conference room facilities. This can be secured by condition if the application were to be approved. The hotel is aimed at catering for motorway drivers on long journeys in need of a break for the night rather than attempting to attract visitors to the area who would be likely to look for hotels situated in a more inviting environment and offering a better range of facilities. It is accepted that the proposal to include a hotel with up to 100 beds as part of the MSA would be a typical feature of a MSA to provide for road users and is not considered to compete with hotels within the town centre.”*
- I.44. The Officer Update Report (CDI.2.11 (b)) proposed an additional condition (paragraph 8.68) to preclude communal uses which was agreed by the Appellant.
- “There shall be no communal lounge or bar and no conference room facilities as part of the hotel hereby approved”.*

Part 6 Conclusion

- I.45. The Appeal proposal is not a retail, leisure, office or other ‘main town centre’ use. It is a ‘sui generis’ use. An MSA has very specific locational requirements in order for it to serve its primary function and support the safety and welfare of users of the Strategic Road Network. There are clear requirements for an MSA set out within Circular 02/2013. The Circular does not seek to control the scale of elements such as retail, hot food and drink or hotel use, but it does establish an objective to ensure that the

MSA is attractive and conducive to encouraging drivers to stop and take a break (paragraph B13, CD3.1.3 (dd)).

- I.46. Within the Appeal proposal there are elements of retail, food and drink and hotel use responding to the requirements established within the Circular and the requirements of road users. These elements are integral to and ancillary to the function of the MSA. It has been demonstrated that they are of a scale and scope that is consistent with the provision within other MSAs across the country, including MSAs within the Green Belt. There is no policy requirement for a sequential test or impact assessment of these uses as they are integral in nature to the function of the MSA and the Appellant's business model and their maximum size is controlled by condition.
- I.47. Nevertheless, the Replacement Planning Statement (CD1.2.3), and the letter to WBC on 14th May 2020 (CD1.2.10 (e)), demonstrated that there were no sequentially preferable sites that could accommodate the MSA in its entirety, having regard to the specific locational requirements of an MSA. It also demonstrated that the proposal would not impact upon the vitality and viability of Birchwood Local Centre.
- I.48. Each of the elements within the MSA have been fully justified, including the quantum of overall floorspace provision within the Facilities Building, which is consistent with other MSAs in the country, and has regard to the minimum requirements in the Circular 02/2013. The overall scale of the Facilities Building also responds to the diverse requirements of modern motorway users, in order for MSAs to be attractive and conducive to encouraging motorway users to stop and rest. The Council agree that the scale of the retail offer is proportionate and integral to the MSA, and is below the local threshold for impact assessment. The Council also accept that the scale of the food and drink offer proposed within the Facilities Building is appropriate, and that the MSA would not constitute a destination in its own right. The Fuel Filling Station is also accepted as an expected feature of an MSA, and the retail element is considered by the Council to be ancillary to the fuel filling station and to the overall MSA, again the provision is below the policy PV5 threshold for impact assessment. Hotels are not included within the NPPF (21) Annex 2 definition of Retail or Leisure use and there is no policy requirement for an impact assessment. Notwithstanding

this, the Hotel provision is consistent with hotel provision across the country, including on Green Belt sites, and the acceptance of hotels as part of MSAs has been tested through appeals, as demonstrated in the accompanying Hotel Study. They support the safety and welfare of the road user by providing the opportunity for a longer rest. Furthermore, the hotel provision will be basic and will not include communal lounges or bars, or conference facilities. It has been accepted that the hotel will cater for the motorway user, providing a different offer with limited facilities to the wider hotel market.

- I.49. Each of the key elements of the Appeal proposal can be controlled. Conditions have been agreed to control the overall floorspace of the Facilities Building, the level of retail provision within the Facilities Building, and within Fuel Filling Station and the number of bed spaces within the hotel.
- I.50. The Appeal proposal is therefore consistent with the NPPF (21) Section 7, and it accords with the Core Strategy Policy PV5.

Extracts from the Letter to WBC, 24th September 2020.

Name	Location	Opening Date	Amenity Building	Hotel Operator and Number of Rooms
Beaconsfield	M40	2009	Alegria, Chozen Noodle & Sushi, El Mexicana, Greggs, KFC, LEON, McDonalds, Nandos, Pizza Express, Starbucks, West Cornwall Pasty Co, Wetherspoons, Nescafe, Krispy Kreme, M&S Simply Food, Tabori, Top Gift, WH Smith, Quicksilver Gaming	Ibis Budget 105 rooms
Birchanger Green	M11	1995	Burger King, Chopstix Noodle Bar, Costa Coffee, the Deli, Harry Ramsden's, KFC, Starbucks, Subway, Tossed, Krispy Kreme, Yorkshire Tea, Fone Bitz, Waitrose, WH Smith	Days Inn 133 rooms

Name	Location	Opening Date	Amenity Building	Hotel Operator and Number of Rooms
Chester	M56	1998	Chozen Noodle and Sushi, Costa Coffee, Fresh Food Café, McDonald's, Pret a Manger, Krispy Kreme, Cotton Traders, Fone Bitz, Spar, WH Smith	Days Inn 40 room
Clacket Lane Eastbound	M25	1993	Breakfast Kitchen, Chozen Noodle and Sushi, Costa Coffee, McDonald's, Krispy Kreme, Cotton Traders, Fone Bitz, WH Smith, Spar.	Days Inn 58 rooms
Clacket Lane Westbound	M25	1993	Chozen Noodle and Sushi, Costa Coffee, Fresh Food Café, McDonald's, Krispy Kreme, Pret a Manger, Cotton Traders, Fone Bitz, WH Smith	Days Inn 58 rooms
Cobham	M25	2012	Alegria, Chozen Noodle and Sushi, Costa Coffee, El Mexicana, Greggs, LEON, Pizza Express, KFC, McDonald's, Nando's, Starbucks, West Cornwall Pasty Co, Krispy Kreme, Nescafé, M&S Simply Food, Top Gift, Tabori, WHSmith	Ramada 99 rooms
Hopwood Park	M42	1999	Burger King, Harry Ramsden's, KFC, Starbucks, Subway, Costa Coffee, Krispy Kreme, The Great British Bakery, Little Waitrose, WH Smith	No Planning Permission has been applied for in respect of a Hotel by Welcome Break
Oxford	M40	1998	Burger King, Costa Coffee, the Deli, Harry Ramsden's, KFC, Pizza Express, Starbucks, Subway, Krispy Kreme, Fone Bitz, Waitrose, WH Smith	Ramada 130 Rooms
Telford	M54	2003	Burger King, the Deli,, The Pasty Shop, Krispy Kreme, Rollover, Starbucks, Waitrose, WH Smith	Days Inn 48 rooms

Table A: MSAs located within the Green Belt, which have opened since 1990, Letter to WBC dated 14th May 2020
CD 1.2.10(e)

Name	Green Belt	Size of Retail Provision	Hotel Operator and Number of Rooms	Planning History
Warrington MSA	Yes	<p>Amenity Building – Maximum of 465 sq. m of retail floor space.</p> <p>Maximum gross area of floor area of fuel filling station forecourt shop: 428 sq. m</p>	Up to 100 bedrooms	N/A
Cobham MSA	Yes	<p>Amenity Building: Maximum of 465 sq. m of retail floorspace</p> <p>Gross area of floor area of fuel filling station forecourt shop: 428 sq. m</p>	Ramada 103 bedrooms	Allowed at Appeal in 2005 APP/K3605/A/95/260796
Beaconsfield MSA	Yes	<p>Amenity Building: Maximum of 465 sq. m of retail floorspace.</p> <p>Gross area of floor area of fuel filling station forecourt shop: 315 sq. m</p>	Ibis Hotel 105 bedrooms	Allowed at Appeal in 2005 APP/K3605/A/95/260796
Birchwood Westbound	Yes	1,025 sq. metres of retail floorspace	Travel Lodge 91 bedrooms	
Birchwood Eastbound	Yes	1,102 sq. metres of retail floorspace	Travel Lodge 55 bedrooms	

Name	Green Belt	Size of Retail Provision	Hotel Operator and Number of Rooms	Planning History
Doncaster MSA	Yes	Total Retail and Food and Beverage Area of 1,495 sq. m, but excludes kitchen area and storage areas within the units	N/a 100 Bedrooms	Refused at Appeal in July 2019 (APP/F4410/W/18 /3197290. However Inspector accepted the principle of the retail and hotel uses.
Ferrybridge	Yes	1,480 sq. metres of retail floorspace	Travel Lodge 37 bedrooms	
Frankley Northbound	Yes	1,541 sq. metres of retail floorspace	No space on site for a hotel	
Frankley Southbound	Yes	1,381 sq. metres of retail floorspace	Travel Lodge – 62 bedrooms	
Heston Westbound	Yes	1,015 sq. metres of retail floorspace	Travel Lodge – 212 bedrooms	
Heston Eastbound	Yes	585 sq. metres of retail floorspace	Travel Lodge – 66 bedrooms	
Hilton Park Northbound	Yes	2011 sq. metres of retail floorspace	No space on site to accommodate a hotel	
Hilton Park Southbound	Yes	1,785 sq. metres of retail floorspace	Travel Lodge 63 bedrooms	
Knutsford Northbound	Yes	1,056 sq. metres of retail floorspace	Travel Lodge 54 bedrooms	

Name	Green Belt	Size of Retail Provision	Hotel Operator and Number of Rooms	Planning History
Knutsford Southbound	Yes	615 sq. metres of retail floorspace	No space on site to accommodate a hotel	
Lancaster Northbound	Yes	1,645 sq. metres of retail floorspace	Travel Lodge 191 bedrooms	
Lancaster Southbound	Yes	1,011 sq. metres of retail floorspace	No space on site to accommodate a hotel	
Wetherby MSA	No	The amenity building- 465m2 of retail floorspace and 93m2 of games/leisure floor space. The gross floor area of the fuel filling station forecourt - 325m2	Days Inn 126 bedrooms	Allowed at Appeal in August 2005 (APP/N4720/V/02/1084989).
Leeds Skelton Lake MSA	No	Facilities building- 5,409sqm (gross internal floorspace) Retail units of which no individual retail unit contained within the Facilities Building shall exceed 929sqm (gross internal floorspace). Fuel filling station and ancillary forecourt shop (450sqm gross internal floorspace).	Ramada 100 bedroom hotel	Approved by the LPA in 2017
		Average Amount of Retail Floorspace of 1,272 sq. metres for both amenity building and Fuel Filling Station	Average size of hotel: 97 bedrooms	

Table B: Sample of MSAs across England showing the amount of retail floorspace and size of the hotel provided within them. Extract Letter to WBC dated 14th May 2020 CD 10.1.2 (e)

**Appendix 01: Hotel Provision at Motorway Service Areas (MSAs)
in England Update Report**

Extra MSA Group

M62/J11 Warrington Services

Hotel Provision at Motorway Service Areas (MSA) in
England Update Report

Revision C 21st February 2022



Revision Record

Revision Reference	Date of Revision	Nature of Revision	Author	Checked By
A	29/1/2022		HL	DR
AI	11/02/2022	Legal Review	HL	DR
B	18/02/2022	Final Review	HL	
C	21/02/2022	Final Issue	KG	

Report Author	Hannah Langler
Report Date	21/02/2022
Project No.	P4151
Document Ref.	PO-TP-SPA-RP-P4151-0032
Revision	C

Contents

1.	Introduction	4
	Scope and Purpose.....	4
	Report Structure.....	4
2.	Planning Policy Context	6
	MSA Planning Applications.....	7
3.	Motorway Service Areas (MSAs) in England	12
4.	MSAs in the Green Belt.....	15
5.	Economic Impact of Hotels at Motorway Service Areas (MSAs)..	26
	Direct Employment Benefits	27
	Economic Output.....	28
6.	Summary	30
7.	Appendices.....	31

Table of Figures

Figure 3.1 – Motorway Service Areas in England

Table 4.1 Hotel Rooms for Motorway Service Areas in the Green Belt

Figure 4.1 Motorway Service Areas in the Green Belt in England

Figure 4.2 Motorway Service Areas in the North West

Figure 4.3 Motorway Service Areas in the Green Belt in the North West

Table 4.2 Motorway services in the North West.

I. Introduction

Scope and Purpose

- I.1. Spawforths have been instructed on behalf of Extra MSA Group to undertake an update to the Hotel Provision at Motorway Service Areas (MSA) in England Report, previously produced on their behalf by Pegasus Group for other Extra MSA planning applications in the Birmingham and Greater London Areas. The Spawforth report utilises the Pegasus work which formed part of their evidence to the Planning Inquiries for Extra MSA schemes at Land at Junction 5A, M42, Solihull (appeal reference APP/Q/4625/W/21/3275290) and Land at Warren Farm Between Junctions 16 and 17 of the M25 Motorway (Appeal Reference APP/X0415/W/21/3272171). Spawforths acknowledge and are grateful to Pegasus for allowing Spawforths to utilise their work. Much of the Pegasus work has been reproduced herein, but it has been updated to include a case study of the North West area, and to reflect more recent appeal decisions.
- I.2. The purpose of this Hotel Provision Update Report is to review hotel provision at Motorway Service Areas (MSAs) in England. The Update Report identifies which MSA sites have a hotel and which do not. It also considers the policy context pertaining to MSAs, with specific regard to the National Planning Policy Framework (NPPF) and DfT Circular 02/2013. The Update Report looks at how hotel provision has been dealt with in a number of other MSA planning applications/appeals since 2005.

Report Structure

- I.3. The structure of the Update Report is as follows:
- Section 2 outlines the planning policy context for MSAs in England, as well as reviewing applications for other schemes, having regard to the extent to which hotel provision was considered.

- Section 3 identifies the location of other MSAs in England, confirming which MSAs include a hotel facility.
- Section 4 identifies MSAs that have been developed within the Green Belt, and which ones include a hotel, with a focus on those within the North West.
- Section 5 provides an overview of the economic impacts that can be anticipated as of the result of the development of a typical MSA hotel, with a focus on the contribution to permanent employment, and the contribution to economic output (GVA).
- Section 6 presents a summary of the main findings.

2. Planning Policy Context

- 2.1. The relevance of the National Planning Policy Framework (NPPF 2021) and Circular 02/2013 to MSA provision is set out in the Evidence of David Rolinson.
- 2.2. Circular 02/2013 contains detailed guidance on spacing requirements, signing, parking charges, picnic areas, parking provision, access to the Strategic Road Network, retail activities, hotels, conference centres and business centres, coach interchanges, park and ride and park and share, facilities for low emission vehicles, driver and tourist information and on site power generation and other sustainability measures. Schedule 1 sets out parking requirements.
- 2.3. With specific regard to the provision of Hotels. Paragraph B30 says that hotels, conference centres and business centres are a matter of consideration for local planning authorities, in line with the NPPF and local planning policies. Paragraph B31 states:

“As a statutory consultee to such proposals, the Highways Agency will not object to the provision of hotels; conference centres; and business centres at the sites of roadside facilities for motorists unless there would be demonstrable adverse impact on the safety and/or operation of the strategic road network such as a net increase in travel.”
- 2.4. Extra MSA Group have been engaging with National Highways with respect of the Appeal proposal at Junction 11 of the M62, as set out in the Evidence of Mr Jones. National Highways confirm **“that the provision of a hotel is a recognised and permitted part of MSA provision serving the safety and welfare needs of road users”**¹. Thus the provision of a hotel is considered by National Highways as being consistent with the primary function of roadside services as set out within the NPPF which is to support the safety and welfare of the road user².

¹ Land to the North of Junction 11, of M62 Warrington, Transport Statement of Common Ground with National Highways, 15th November 2021.

² Paragraph 106, Footnote 44, National Planning Policy Framework, July 2021.

MSA Planning Applications.

2.5. When assessing hotel provision at MSAs, it is helpful to consider planning decisions made for previous MSA developments. Six schemes have been reviewed in this respect, five of which are in the Green Belt:

- Oxford Services: An MSA located on the M40 in the Green Belt. It was approved via appeal by the Secretary of State in 1996. Since then, four applications for hotel extensions have been approved.
- Cobham: An MSA in the Green Belt, which was allowed at appeal in 2005.
- Beaconsfield: An MSA in the Green Belt, which was also allowed at appeal in 2005.
- Doncaster: An MSA in the Green Belt, which was refused at appeal in July 2019.
- Vale of York, Harrogate: An MSA that was granted planning permission in April 2021.
- Warren Farm: An MSA in the Green Belt, which was refused at appeal in November 2021.

Oxford Motorway Service Area

2.6. Planning permission for Oxford services, which is in the Green Belt, was approved on appeal by the SoS in 1996³. The proposals included a hotel and in relation to this, a neutral view was taken in the appeal decision. *“From the motorway safety viewpoint, the provision of a travel lodge (in the case of the Forte proposal a Travelodge) can be perceived in two ways. It can be argued that a facility for tired motorists to stop overnight to break their journeys without using local roads contributes to road safety. It can also be argued*

³ APP/Q3115/A/94/237129; APP/K0425/A/94/237278; APP/Q3115/A/94/237798; APP/K0425/A/94/239861; APP/Q3115/A/94/240664; and APP/Q3115/A/94/242628

that the presence of travel lodges may lead to tired motorists, who have assumed from published information that they will be able to obtain accommodation but find the lodge fully booked, having to continue their journey on the motorway. The high average occupancy and turn-away rates achieved for all Travelodges suggest to me that these latter circumstances may arise, in which case there would be an element of harm to road safety. There is no clear evidence either way and I am therefore take a neutral view on this aspect.” Paragraph 15.148.

- 2.7. Since the appeal decision, four applications for hotel extensions have been approved at the MSA. The first two were not implemented, the third was for a 33 bed extension in 2012 (similar to two previous expired approvals) and the fourth was for a 34 bed extension in 2017. In relation to the fourth application for the 34 bed extension, the supporting planning statement noted the need for hotel bed spaces in South Oxfordshire (the LPA) was identified in a 2014 Hotel Needs Assessment. The planning statement also noted that the proposals would generate additional employment and capture additional visitor spend in the local area.

Cobham and Beaconsfield Motorway Service Areas

- 2.8. Planning permission was granted on appeal in 2005 for MSAs at Cobham and Beaconsfield⁴, both of which are in the Green Belt. Beaconsfield MSA opened in 2009 and is located at J2 of the M40, while Cobham MSA opened in 2012 and is located between J9 and J10 of the M25. The appeals for both MSAs were held at a public inquiry between November 2002 and October 2003, hence they are grouped together for the purposes of this report.
- 2.9. Beaconsfield MSA includes a 105 bed hotel, while Cobham MSA has a 99 bed hotel. In the appeal decision for the Beaconsfield MSA, the Secretary of State concluded, in paragraph 143, that the proposed hotel did “*not require separate justification*”.

⁴ Appeal Reference: Various - APP/K3605/A/95/260796; APP/C0305/A/96/266283; APP/T0255/a/01/1070069; APP/T0355/V/01/1073114, APP/N0410/A/98/1012311 and APP/N41- /A/00/1039103, Appeal Decision Date 6th October 2005

2.10. Subsequent to the appeal decision at Cobham, an application (application reference 2014/2671) was submitted in 2014 for an extension to the existing hotel and MSA amenity building. The application was refused, however it was subsequently allowed at appeal in 2015. The need for additional bed spaces was not a reason for refusal and was not raised by the Council at appeal. The appeal scheme sought to increase the bedroom numbers to 85 which the Inspector confirmed in paragraph 17 that the resultant number of rooms “*would not be dissimilar to that of the hotel at the Beaconsfield MSA*” and that “*this example at least serves to suggest that the proposed hotel would not be disproportionately large in comparison to others*”. The Inspector found no reason to refuse permission on the grounds of increased room numbers, sizes or the addition of a restaurant. Despite the appeal site lying in the Green Belt, the Inspector found no reason to consider the development contrary to the development plan or national policy (paragraph 24).

Doncaster Motorway Service Area.

2.11. Doncaster MSA (application reference: 17/00301/FULM) was proposed to be located on land north east of J37 of the A1(M) motorway. The application sought planning permission for a new MSA to provide an Amenity Building (3,959 sq. m.), 100 bed Lodge (2,865 sq. m.), Fuel Filling Station (261 sq. m.), Drive Thru Coffee Unit (205 sq. m.), parking for all classes of vehicles, landscape, and amenity areas.

2.12. The application was refused planning permission by Doncaster Metropolitan Borough Council in 2018. An appeal was submitted for the proposals (reference APP/F4410/W/18/197290), which was subsequently rejected by the Inspector and Secretary of State. The main reasons for refusal were the harm to Green Belt openness, landscape harm, loss of agricultural land and whether ‘very special circumstances’ could be demonstrated.

2.13. Despite the MSA being refused planning permission, specific mention was made by the Inspector, to the proposed 100 bed lodge. Paragraph 204 of the Inspector’s decision states that:

“Should a need for an MSA be established then it would be entirely appropriate for it to offer the range of facilities normally expected at such an establishment. There is nothing about the scale and range of facilities proposed that would set it apart from other MSAs or that would suggest that it would become a destination in its own right. The lodge for example, would offer nothing but basic bedroom accommodation, there would be no communal lounge, bars or restaurants and no conference room facilities. It is clearly aimed at catering for motorway drivers on long journeys in need of a break for the night rather than attempting to attract visitors to the area who would likely to look for hotels situated in a more inviting environment and offering a better range of facilities”.

Vale of York MSA

- 2.14. A three week inquiry held from February-March 2021, considered two Appeals comprising a proposal for a new MSA at Junction 50 of the A1(M) close to Ripon (APP/E3734/W/20/3261729), which was dismissed, and the proposed Vale of York MSA (APP/E2734/W/20/3245778) between Junctions 48-49 of the A1(M), which was allowed.
- 2.15. In refusing permission for the Ripon MSA, the Inspector concluded that the proposals would represent a very sizeable incursion into the rural landscape and seriously undermine its inherent characteristics. By contrast, the Inspector concluded that the Vale of York MSA would protect the landscape character of the area.
- 2.16. The Ripon MSA (to be run by Moto) included plans for a 100 bed hotel, whereas the Vale of York MSA (to be run by Applegreen) will have no hotel provision on-site. While the Vale of York MSA was ultimately the successful scheme on appeal, it is worth noting the Inspectors stated the following, in paragraph 229 of their decision, which emphasises that the hotel is seen as an additional benefit and the need for which was not challenged:

“Whilst the offer of overnight accommodation at a MSA is not an essential requirement, the Moto scheme includes a 100-bedroomed lodge. This would provide an additional amenity

capable of supporting the safety and welfare of motorway users. In that context, the proposed lodge would provide a modest benefit over the Applegreen scheme”.

Warren Farm Chalfont St Peter Motorway Service Area

- 2.17. Warren Farm MSA, Appeal Reference APP/X0415/W/21/3272171 for the development of a motorway service area, comprising of a facilities building, fuel filling station, electric vehicle charging, up to 100- bedroom hotel, service yard, parking facilities, vehicle circulation, landscaping, woodland and amenity spaces, on land between junctions 16 and 17 of the M25, near Chalfont St Peter was dismissed on 17th November 2021.
- 2.18. The Appeal site lies within the Green Belt. Whilst the appeal was dismissed, the Inspector concluded that Hotel facilities are a common element of an MSA that deliver safety and welfare benefits for motorway users. Paragraph 69 of the Inspectors report states *“there are some elements of the scheme that are not needed to meet the minimum requirements for an MSA. This includes the 100-bed hotel. That said, whilst not supported by a strong business case, a hotel is a common element of an MSA and provides an extra facility with some safety and welfare benefits for motorway users... All in all these additional elements represent a moderate benefit.”*

3. Motorway Service Areas (MSAs) in England

- 3.1. In total there are 116 service areas on England's motorways. Figure 3.1 identifies the location of the MSAs in England and distinguishes between the MSAs which have a hotel and those which do not. It should be noted that where a service area is on both sides of the road, it is counted twice in the analysis. Furthermore, it should also be noted that not all of the services listed on the map are classified as MSAs.
- 3.2. The majority (89 – 76.7%) of MSAs in England have a hotel and the remaining 27 (23.3%) have no hotel. Rugby, which opened in 2021 and is therefore the most recent MSA, does not have a hotel.
- 3.3. The hotels at MSAs have varying numbers of rooms for a number of reasons. For example, some MSA hotels only serve traffic in one direction such as Gloucester Services, between Junction 11A and Junction 12 of the M5, which has planning permission for a hotel on the South bound side only. Although the hotel has not yet been built, Gloucester Services is included in Figure 3.1 as an MSA with a hotel as permission has already been granted for a 74 room hotel.
- 3.4. Hotels at other MSAs, such as the Days Inn at Woodhall Services between J30 and J31 of the M1, are older and have not been extended since they were first developed. The Days Inn at Woodall Services has 38 rooms. Other examples of the differing number of rooms include the Ramada Hotel at Newport Pagnell Services between Junction 14 and 15 of the M1 in Milton Keynes with 101 rooms, and the hotel at Tebay Services northbound between Junctions 38 and 39 of the M6 in Cumbria with 51 rooms.
- 3.5. Other MSA sites have had their hotels re-developed and/or extended since they were originally built. For example, as already noted in section two of this Update Report, Oxford Services was originally given permission for a 49 bed hotel in 1996. Since then, four applications for hotel extensions have been approved. The first two were not implemented, the third was a 33 bed extension in 2012 (similar to two previous

expired approvals) and the fourth a 34 bed extension in 2017. The hotel now has 116 rooms in total.

- 3.6. It should be noted that there are 31 MSAs in England that have no hotel but a hotel exists at the services on the opposite side of the motorway. Where these MSAs are linked to their opposite sites via a footbridge, they have been included in the analysis as services with hotels. Where there is no clear pedestrian link between the two sites, they are counted as MSAs with no hotel. Overall, out of the 31 MSAs, 15 are counted as having a hotel and 16 are classified as having no hotel.
- 3.7. Looking at more recent MSAs, 19 MSAs have been built across England since 2000 and 73.7% (14) of these have hotels.
- 3.8. Appendix A contains a list of all MSAs included in the analysis.

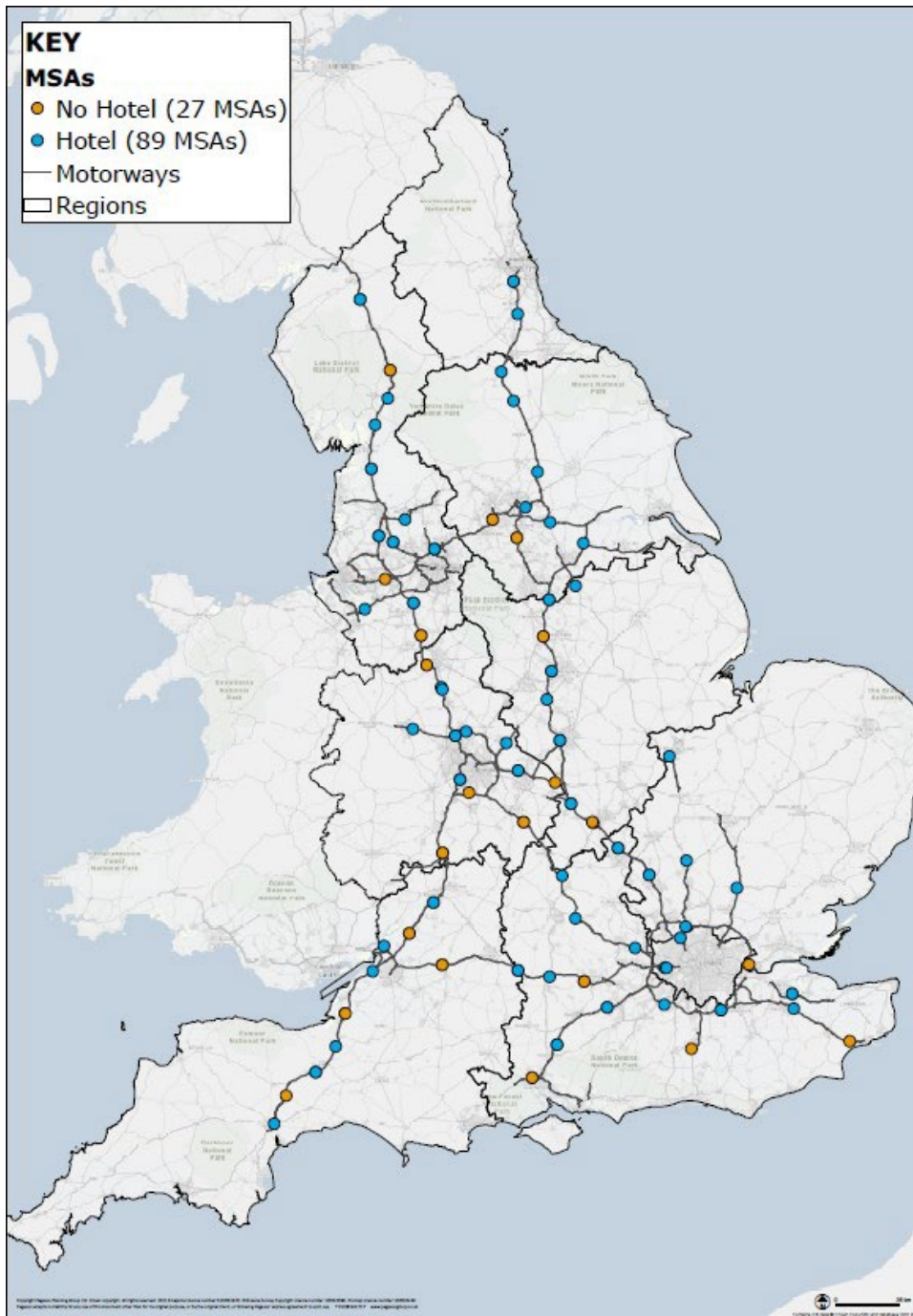


Figure 1.1 – Motorway Service Areas in England (Source: Pegasus Research Group and Motorway Services Online, Hotel Provision at MSAs in England including Birmingham Case Study, 2021.⁵

⁵ Where an MSA is on both sides of the motorway, but share the same postcode, the MSA only appears once in Figure 3.1

4. MSAs in the Green Belt.

- 4.1. There are 42 MSAs located within the Green Belt on motorways in England (Figure 4.1). This accounts for just over a third (36.2%) of the total Motorway Service Areas in England. The majority (81.0% – 34) of these MSAs have hotels. Of the 14 MSAs in the Green Belt, which have opened since the 1990s, only three do not have a hotel. All of the MSAs that have opened in the Green Belt since 2000 (5) have hotels.
- 4.2. Table 4.1 shows each of the MSAs in the Green Belt as well as whether they have a hotel and the number of rooms. The Travel Lodge at Heston Westbound Services between Junctions 2 and 3 of the M4 in Hounslow has the largest number of rooms of the Green Belt MSAs at 145. Rivington Lodge at Rivington Services between Junction J6 and J8 of the M61 in Lancashire has the lowest number of rooms at 32.

Services	Location	Year opened	LPA	Hotel	Hotel Name	Rooms
Beaconsfield	M40 at J2	2009	Buckinghamshire	Yes	Ibis	105
Birch eastbound	M62 between J18 and J19	1972	Rochdale	Yes	Travel Lodge	55
Birch westbound	M62 between J18 and J20	1973	Rochdale	Yes	Travel Lodge	35
Birchanger Green	M11 at J8	1995	Uttlesford	Yes	Days Inn	60
Charnock Richard northbound	M6 between J27 and J28	1963	Chorley	Yes*	See below	See below
Charnock Richard southbound	M6 between J27 and J29	1963	Chorley	Yes	Ramada	72
Chester	M56 at J14	1998	Cheshire West and Chester	Yes	Days Inn	37

Services	Location	Year opened	LPA	Hotel	Hotel Name	Rooms
Clacket Lane eastbound	M25 between J5 and J6	1993	Tandridge	No**	-	-
Clacket Lane westbound	M25 between J5 and J7	1993	Tandridge	Yes	Days Inn	58
Cobham	M25 between J9 and J10	2012	Elmbridge	Yes	Ramada	99
Corley northbound	M6 between J3 and J3A	1972	North Warwickshire	Yes*	See below	See below
Corley southbound	M6 between J3 and J3A	1972	North Warwickshire	Yes	Days Inn	50
Ferrybridge	M62 at J33 and A1	1989	Wakefield	Yes	Travel Lodge	35
Frankley northbound	M5 between J3 and J4	1966	Bromsgrove	No**	-	-
Frankley southbound	M5 between J3 and J5	1966	Bromsgrove	Yes	Travel Lodge	62
Gordano	M5 at J19	1973	North Somerset	Yes	Ramada	89
Hartshead Moor eastbound	M62 between J25 and J26	1973	Calderdale	Yes	Days Inn	39
Hartshead Moor westbound	M62 between J25 and J27	1973	Calderdale	No**	-	-
Heston eastbound	M4 between J2 and J3	1998	Hounslow	Yes	Travel Lodge	66

Services	Location	Year opened	LPA	Hotel	Hotel Name	Rooms
Heston westbound	M4 between J2 and J4	1998	Hounslow	Yes	Travel Lodge	145
Hilton Park northbound	M6 between J10A and J11	1967	South Staffordshire	Yes*	See below	See below
Hilton Park southbound	M6 between J10A and J12	1967	South Staffordshire	Yes	Travel Lodge	63
Hopwood Park	M42 at J2	1999	Bromsgrove	No	-	-
Keele northbound	M6 between J15 and J16	1963	Newcastle-under-Lyme	No	-	-
Keele southbound	M6 between J15 and J17	1964	Newcastle-under-Lyme	No	-	-
Knutsford northbound	M6 between J18 and J19	1963	Cheshire East	Yes	Travel Lodge	54
Knutsford southbound	M6 between J18 and J20	1963	Cheshire East	Yes*	See above	See above
Oxford	M40 at J8A and A40	1998	South Oxfordshire	Yes	Ramada	116
Rivington northbound	M61 between J6 and J8	2011	Chorley	Yes*	See below	See below
Rivington southbound	M61 between J6 and J9	2011	Chorley	Yes	Rivington Lodge	32
Severn View	M48 at J1, M4 at J21 and J22	1966	South Gloucestershire	Yes	Travel Lodge	50

Services	Location	Year opened	LPA	Hotel	Hotel Name	Rooms
South Mimms	M25 at J23 and A1(M) at J1	1987	Hertsmere	Yes	Ramada	75
Telford	M54 at J4	2003	Shropshire	Yes	Days Inn	48
Thurrock	M25 at J30 and J31, A13 and A282	1992	Thurrock	No	-	-
Toddington northbound	M1 between J11 and J12	1964	Central Bedfordshire	Yes*	See below	See below
Toddington southbound	M1 between J11 and J13	1964	Central Bedfordshire	Yes	Travel Lodge	66
Trowell northbound	M1 between J25 and J26	1967	Broxtowe	Yes	Travel Lodge	35
Trowell southbound	M1 between J25 and J27	1967	Broxtowe	Yes*	See above	See above
Woodall northbound	M1 between J30 and J31	1968	Rotherham	Yes*	See below	see below
Woodall southbound	M1 between J30 and J32	1968	Rotherham	Yes	Days Inn	38
Woolley Edge northbound	M1 between J38 and J39	1972	Wakefield	Yes	Travel Lodge	73
Woolley Edge southbound	M1 between J38 and J40	1972	Wakefield	No**	-	-

Table 4.1 – Hotel Rooms for Motorway Service Areas in the Green Belt⁶

Source: Hotel Provision at MSA's in England – Including Birmingham Case Study, Pegasus, 2021 and Motorway Services Online.

Key:

Y – Hotel.

Y* – No hotel but has a footbridge linking the services to the hotel on the opposite side of the motorway.

N – No hotel.

N** – No hotel, opposite a services with a hotel but there is no footbridge linking to two sites.

⁶ The majority of Norton Canes Services is outside the Green Belt, only a small area of parking falls within the Green Belt. It is therefore not included within this analysis

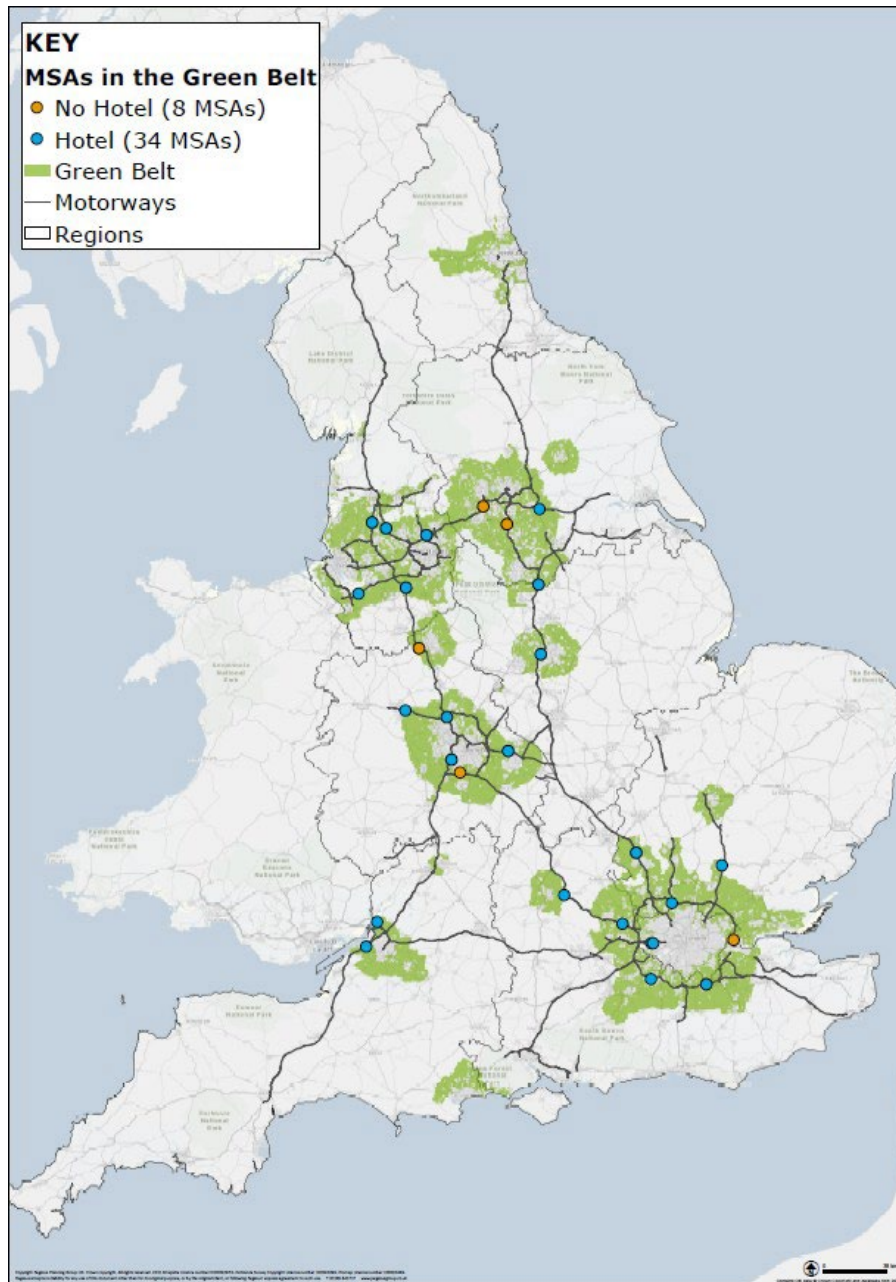


Figure 4.1 – Motorway Service Areas in the Green Belt (in England)⁷

Source: Hotel Provision at MSAs in England –including Birmingham case study, Pegasus 2021

⁷ Where an MSA is on both sides of the Motorway but both sides have the same postcode, the MSA only appears once in Figure 4.1.

Motorway Service Areas in the North West.

- 4.3. For the purposes of this Update Report, we have identified the North West region as comprising Cheshire West and Chester, Cheshire East, Halton, Warrington, St Helens, Liverpool, Knowsley, Greater Manchester authorities, Blackburn with Darwen, Blackpool, Lancashire and Cumbria. In the North West Region area there are 21 Motorway Service Areas (MSAs), of which 18 (85%) have a hotel or access via bridge/tunnel to a hotel, refer to table 4.2.

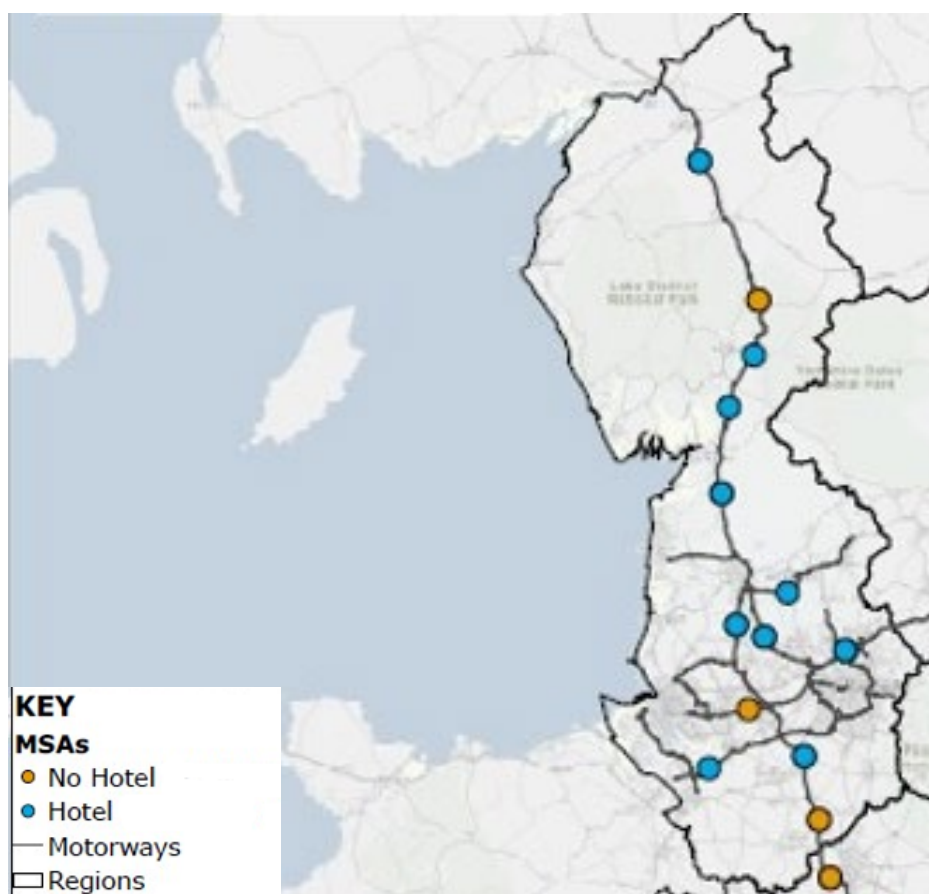


Figure 4.2: Motorway Service Areas in the North West

Source: Hotel Provision at MSAs in England –including Birmingham case study, Pegasus 2021

4.4. Of the MSAs within the North West, nine (circa 47%) are located within the Green Belt, these are detailed in table 4.2 and illustrated on figure 4.2 below. Lymm Truck Stop is also located within the Green Belt. Burtonwood MSA is not situated within the Green Belt though land within the designated Green Belt adjoins the site on three sides. Of the nine MSAs located within the Green Belt, all of them include a Hotel, or have access to a Hotel via a bridge/underpass. As identified above Lymm Truckstop is located within the Green Belt and it also includes a Hotel.



Figure 4.3: Motorway Service Areas in the Green Belt in the North West

Source: Spawforths & Motorway Services Online

Services	Location	Year opened	LPA	Hotel	Hotel Name	Rooms	Green Belt
Birch eastbound	M62 between J18 and J19	1972	Rochdale	Yes	Travel Lodge	55	Yes
Birch westbound	M62 between J18 and J20	1973	Rochdale	Yes	Travel Lodge	35	Yes
Blackburn with Darwen	M65 at J4	2002	Blackburn	Yes	Travel Lodge		No
Burtonwood	M62 at J8	1974	Warrington	No	-	-	No
Charnock Richard northbound	M6 between J27 and J28	1963	Chorley	Yes*	See below	See below	Yes
Charnock Richard southbound	M6 between J27 and J29	1963	Chorley	Yes	Ramada	72	Yes
Chester	M56 at J14	1998	Cheshire West and Chester	Yes	Days Inn	37	Yes
Knutsford northbound	M6 between J18 and J19	1963	Cheshire East	Yes	Travel Lodge	54	Yes
Knutsford southbound	M6 between J18 and J20	1963	Cheshire East	Yes*	See above	See above	Yes
Lancaster northbound	M6 between J32 and J33	1965	Wyre	Yes	Travelodge		No
Lancaster southbound	M6 between J32 and J33	1965	Wyre	Yes*	Travelodge		No

Services	Location	Year opened	LPA	Hotel	Hotel Name	Rooms	Green Belt
Lymm Truck Stop ⁸	M6 J10/M56 J9	1994	Warrington	Yes	Ibis Budget		Yes
Rivington northbound	M61 between J6 and J8	2011	Chorley	Yes*	See below	See below	Yes
Rivington southbound	M61 between J6 and J9	2011	Chorley	Yes	Rivington Lodge	32	Yes
Sandbach northbound	M6 between J16 and J17	1975	Cheshire East	No	-	-	No
Sandbach northbound	M6 between J16 and J17	1975	Cheshire East	No	-	-	No
Southwaite northbound	M6 between J41 and J42	1972	Eden	Yes*	See below		No
Southwaite Southbound	M6 between J41 and J42	1977	Eden	Yes	Travelodge		No
Tebay northbound	M6 southbound between J38 and J39	1972	Eden	Yes	Westmorland Hotel	50	No
Tebay southbound	M6 southbound between J38 and J39	1993	Eden	Yes*	See above	See above	No

Table 4.2 –Motorway Service Areas within the North West

Source: Spawforths, Motorway Services Online, and Hotel Provision at MSAs in England, Pegasus 2021

Key:

Y – Hotel.

⁸ Lymm Truck Stop is not a Motorway Service Area, however has been included for purposes of completeness having regard to the Study Area. It opened at the current site in 1994,

Y* – No hotel but has a footbridge linking the services to the hotel on the opposite side of the motorway.

N – No hotel.

N** – No hotel, opposite a services with a hotel but there is no footbridge linking to two sites.

5. Economic Impact of Hotels at Motorway Service Areas (MSAs)

- 5.1. The Strategic Road Network plays a key role in the safe and efficient movement of goods, supplies and people around the United Kingdom; it is critical to the performance of the economy and is essential in helping to facilitate planned economic growth.
- 5.2. Circular 02/2013 is clear that *‘operating an effective and efficient strategic road network makes a significant contribution to the delivery of sustainable economic growth’*⁹. Paragraph 8 goes on to state that a well-functioning Strategic Road Network enables growth by providing for safe and reliable journeys. MSAs perform an important road safety function by providing opportunities for the travelling public to stop and take a break in the course of their journey.
- 5.3. Mr Jones’s evidence confirms that the UK’s network of Motorway Service Areas perform an essential road safety function in ensuring the safety and welfare of drivers and their passengers, and this underpins the safe and efficient operation of the M6, M62 and M60 in the North West of England, and other Motorways throughout the country. MSAs create opportunities and facilities for motorists and commercial drivers and their passengers to take breaks, refresh and relax in safe and convenient locations on the Strategic Road Network. Appropriately spaced MSA provision is therefore fundamental to public safety, and therefore meeting National Highways objectives to reduce accidents on the Strategic Road Network
- 5.4. The inclusion of a Hotel at an MSA has been accepted as a common component of an MSA. Furthermore Inspectors in recent appeals¹⁰ have accepted that the incorporation of a lodge/hotel provides an additional benefit, in terms of public safety and welfare of motorway users.

⁹ Paragraph 2, DfT Circular 02/2013 The Strategic Road Network and the delivery of Sustainable Development.

¹⁰ App/X0415/W/21/3272171 and APP/E2734/W/20/321729

Direct Employment Benefits

5.5. Direct economic benefits will arise from the inclusion of a Hotel at an MSA, through job creation and a corresponding contribution to economic output¹¹. Drawing on the Employment Density Guide produced by the Homes and Communities Agency¹², (now part of Homes England), it is possible to estimate the gross employment resultant from the delivery of a Hotel.

5.6. The Employment Density Matrix provides the following job estimates for Hotels:

Hotel Class	Number of Full Time Equivalent Jobs Created
Limited Service/Budget	1 per 5 beds
Mid-Scale	1 per 3 beds
Upscale	1 per 2 beds
Luxury	1 per 1 bed

5.7. The Employment Density Guide considers that Limited Service Budget Hotels, are typically 1, 2, and 3 star hotels, with example operators cited as Travelodge, Premier Inn, and Ibis. Mid-Scale Hotels are identified as including 3 or 4 Star properties, with operators such as Hilton Garden Inn, Holiday Inn Express and Park Inn. MSA Hotel operators typically include Travelodge, Ramada, Days Inn and Ibis.

5.8. Taking this into account, if it is assumed that a typical MSA is in the Limited Service/Budget category, this would create 1 FTE for every 5 beds. If a proposed MSA included plans for a 100 bed hotel, circa **20 gross FTE jobs** would be generated on site. A Mid-Scale offering for an equivalent sized hotel is estimated to create

¹¹ For the purposes of this report we have not sought to identify the job creation arising during the construction phase of development. The construction phase will lead to additional job creation.

¹² Employment Density Guide, 3rd Edition. Homes and Communities Agency, November 2015.

approximately **33 gross FTE jobs**. This would be in addition to the employment on site supported by the wider MSA facilities. In addition to the potential jobs provided directly on site, the operation of a hotel will support job creation in supporting services and suppliers (indirect employment) and will support employment in the wider economy as a result of the available expenditure (induced employment).

Economic Output

- 5.9. Another way of looking at the economic impact of hotels at MSAs is to calculate the contribution they make to wealth creation, as measured by the increase in the value of goods and services generated within an area. This can be done by looking at the increase in Gross Value Added (GVA). GVA measures the *'contribution to the economy of each individual producer, industry or sector. Simplistically it is the value of the amount of goods and services that have been produced, less the cost of all inputs and raw materials that are directly attributable to that production'*¹³.
- 5.10. GVA as a result of the permanent jobs created through hotel use can be estimated using ONS data. The ONS Sub Regional Productivity Series provides estimates of GVA per filled job. In England this was £57,583 which is the average across all sectors. In order to estimate the GVA per head in the accommodation and food services industry, Regional Gross Value Added (balanced) by industry data provides GVA per industry sector. For the Accommodation and Food Services industry this amounted to £50,768 million in 2019. The ONS Business Population Estimates (October, 2019) estimated total employment in England within the Accommodation and Food Services sector to be 2.019 million. This data indicates that the average annual GVA per employee for the accommodation and food services industry is circa £25,145.

¹³ Source: ONS.

- 5.11. Applying the GVA estimate of £25,000 per employee per annum to the employment estimates outlined above, a 100 bed hotel at an MSA could generate between **£0.5 million to £0.825 million** of GVA on an annual basis.
- 5.12. In addition to GVA creation as a result of the direct job creation, there will be a net additional GVA as a result of indirect job creation and induced job creation.
- 5.13. The provision of a new hotel will also generate business rate income as a result of the delivery of new employment floorspace.

6. Summary

- 6.1. In summary, from the review of the policy context and recent appeal decisions it is clear that **the provision of a hotel is a recognised and permitted part of Motorway Service Area (MSA) provision, serving the safety and welfare needs of road users.** As such provision of a hotel can be considered consistent with the primary function of roadside services as described in the NPPF (2021) which is to support the safety and welfare of the road user, with recent decisions concluding that hotel provision amounts to an additional benefit.
- 6.2. In England there are 116 MSAs on England's motorway network. The majority of MSAs in England include a hotel. Given the location of many sections of the Motorway network, and the extent of the Green Belt in England, there are a significant number of MSAs located within the Green Belt. Around one third of all MSAs are located within the Green Belt. The vast majority of these have hotels (81%). In the North West all MSAs within the Green Belt include a hotel. The research confirms that this is not just resultant from historic development, but that all of the MSAs that have opened in the Green Belt since 2000 include a hotel. This serves to demonstrate that hotels are an accepted and permitted feature of MSAs supporting their primary function, even when they are located within the Green Belt.
- 6.3. Not only are hotels an accepted component of MSAs, providing potential additional benefits in terms of safety and welfare, but they deliver additional economic benefits. This includes the economic benefits that arise as a result of supporting the safe and efficient operation of the Strategic Road Network, but also the economic benefits derived through direct, indirect and induced job creation, in addition to the job creation resultants from the other MSA facilities. In addition to the employment created, the provision of a hotel will also generate GVA, and business rates during its operation.

7. Appendices

Appendix I – List of MSAs in England

Services	Location	Year opened	Hotel
Baldock	A1(M)/A1 at J10	2001	Y
Beaconsfield	M40 at J2	2009	Y
Birch eastbound	M62 between J18 and J19	1972	Y
Birch westbound	M62 between J18 and J19	1972	Y
Birchanger Green	M11 at J8	1995	Y
Blackburn with Darwen	M65 at J4	2002	Y
Blyth	A1(M)/A1 at J34	1987	Y
Bridgwater	M5 at J24	1999	Y
Burton-in-Kendal	M6 northbound between J35 and J36	1970	Y
Burtonwood	M62 at J8	1974	N
Charnock Richard northbound	M6 between J27 and J28	1963	Y*
Charnock Richard southbound	M6 between J27 and J28	1963	Y
Cherwell Valley	M40 at J10 and A43	1994 (rebuilt & reopened in 2012)	Y
Chester	M56 at J14	1998	Y
Chieveley	M4 at J13 and A34	1986	Y
Clacket Lane eastbound	M25 between J5 and J6	1993	N**
Clacket Lane westbound	M25 between J5 and J6	1993	Y

Services	Location	Year opened	Hotel
Cobham	M25 between J9 and J10	2012	Y
Corley northbound	M6 between J3 and J3A	1972	Y*
Corley southbound	M6 between J3 and J3A	1972	Y
Cullompton	M5 at J28	1999	N
Doncaster (North)	M18 at J5 and M180	2000	Y
Donington	M1 at J23A and J24, A42 and A50	1999	Y
Durham	A1(M) at J61	1994	Y
Exeter	M5 at J30	1977	Y
Ferrybridge	M62 at J33 and A1	1985	Y
Fleet northbound	M3 between J4A and J5	1973	Y
Fleet southbound	M3 between J4A and J5	1973	Y*
Folkestone (Stop 24)	M20 at J11	2008	N
Frankley northbound	M5 between J3 and J4	1966	N**
Frankley southbound	M5 between J3 and J4	1966	Y
Gloucester northbound	M5 between J11A and J12	2014	N**
Gloucester southbound	M5 between J11A and J12	2015	Y
Gordano	M5 at J19	1973	Y
Hartshead Moor eastbound	M62 between J25 and J26	1973	Y

Services	Location	Year opened	Hotel
Hartshead Moor westbound	M62 between J25 and J26	1973	N**
Heston eastbound	M4 between J2 and J3	1967 (rebuilt 1981 and 1998)	Y
Heston westbound	M4 between J2 and J3	1967 (rebuilt 1981 and 1998)	Y
Hilton Park northbound	M6 between J10A and J11	1970	Y*
Hilton Park southbound	M6 between J10A and J11	1970	Y
Hopwood Park	M42 at J2	1999	N
Keele northbound	M6 between J15 and J16	1963	N
Keele southbound	M6 between J15 and J16	1963	N
Killington Lake	M6 southbound between J36 and J37	1972 (rebuilt 1985)	Y
Knutsford northbound	M6 between J18 and J19	1963	Y
Knutsford southbound	M6 between J18 and J19	1963	Y*
Lancaster northbound	M6 between J32 and J33	1965	Y
Lancaster southbound	M6 between J32 and J33	1965	Y*
Leeds Skelton Lake	M1 at J45	2020	Y
Leeming Bar	A1(M) at J51	1977	Y
Leicester Forest East northbound	M1 between J21 and J21A	1966	Y

Services	Location	Year opened	Hotel
Leicester Forest East southbound	M1 between J21 and J21A	1966	Y*
Leigh Delamere westbound	M4 between J17 and J18	1972	Y
Leigh Delamere eastbound	M4 between J17 and J18	1972	N**
London Gateway	M1 between J2 and J4	1969	Y
Maidstone	M20 at J8	1997	Y
Medway eastbound	M2 between J4 and J5	1963	Y*
Medway westbound	M2 between J4 and J5	1963	Y
Membury eastbound	M4 between J14 and J15	1972	N**
Membury westbound	M4 between J14 and J15	1972	Y
Michaelwood northbound	M5 between J13 and J14	1971	Y
Michaelwood southbound	M5 between J13 and J14	1971	N**
Newport Pagnell northbound	M1 between J14 and J15	1959	Y
Newport Pagnell southbound	M1 between J14 and J15	1959	Y*
Northampton northbound	M1 at J15A and A43	1978	Y
Northampton southbound	M1 at J15A and A43	1978	Y
Norton Canes	M6 Toll between JT6 and JT7	2004	Y
Oxford	M40 at J8A and A40	1998	Y

Services	Location	Year opened	Hotel
Pease Pottage	M23 at J11 and A23	1992	N
Peterborough	A1(M)/A1 at J17	2001	Y
Reading eastbound	M4 between J11 and J12	1995	Y
Reading westbound	M4 between J11 and J12	1995	N**
Rivington northbound	M61 between J6 and J8	1971	Y*
Rivington southbound	M61 between J6 and J8	1971	Y
Rownhams northbound	M27 eastbound between J3 and J4	1976	Y
Rownhams southbound	M27 eastbound between J3 and J4	1987	N**
Rugby	M6 at J1	2021	N
Sandbach northbound	M6 between J16 and J17	1975	N
Sandbach southbound	M6 between J16 and J17	1975	N
Scotch Corner	A1(M) at J53 and A66	1980	Y
Sedgemoor northbound	M5 northbound between J21 and J22	1987	Y
Sedgemoor southbound	M5 southbound between J21 and J22	1986	N**
Severn View	M48 at J1, M4 at J21 and J22	1966	Y
South Mimms	M25 at J23 and A1(M) at J1	1987	Y
Southwaite northbound	M6 between J41 and J42	1972	Y

Services	Location	Year opened	Hotel
Southwaite southbound	M6 southbound between J41 and J42	1977	Y
Stafford northbound	M6 northbound between J14 and J15	1996	Y
Stafford southbound	M6 southbound between J14 and J15	1999	Y
Strensham northbound	M5 between J7 and J8	1962 (1994 new northbound/2002 new southbound)	Y
Strensham southbound	M5 between J7 and J8	1962 (1994 new northbound/2002 new southbound)	N**
Tamworth	M42 at J10 and A5	1990	Y
Taunton Deane northbound	M5 northbound between J25 and J26	1989	Y
Taunton Deane southbound	M5 southbound between J25 and J26	1976	Y
Tebay northbound	M6 southbound between J38 and J39	1972	Y
Tebay southbound	M6 southbound between J38 and J39	1993	N**
Telford	M54 at J4	2003	Y
Thurrock	M25 at J30 and J31, A13 and A282	1992	N
Tibshelf northbound	M1 between J28 and J29	1999	Y

Services	Location	Year opened	Hotel
Tibshelf southbound	M1 between J28 and J29	1999	N**
Toddington northbound	M1 between J11 and J12	1964	Y*
Toddington southbound	M1 between J11 and J12	1964	Y
Trowell northbound	M1 between J25 and J26	1967	Y
Trowell southbound	M1 between J25 and J26	1967	Y*
Warwick northbound	M40 between J12 and J13	1994	Y
Warwick southbound	M40 between J12 and J13	1994	N**
Washington northbound	A1(M) between J64 and J65	1970	Y
Washington southbound	A1(M) between J64 and J65	1970	Y*
Watford Gap northbound	M1 between J16 and J17	1959	Y*
Watford Gap southbound	M1 between J16 and J17	1959	Y
Wetherby	A1(M) at J46	2008	Y
Winchester northbound	M3 between J8 and J9	2001	N**
Winchester southbound	M3 between J8 and J9	2001	Y
Woodall northbound	M1 between J30 and J31	1968	Y*
Woodall southbound	M1 between J30 and J31	1968	Y
Woolley Edge northbound	M1 between J38 and J39	1972	Y
Woolley Edge southbound	M1 between J38 and J39	1972	N**

Source: Hotel Provision at MSAs in England – including Birmingham Case Study, Pegasus Group, 2021.

Key:

Y – Hotel.

Y* – No hotel but has a footbridge linking the services to the hotel on the opposite side of the motorway.

N – No hotel.

N** – No hotel, opposite a services with a hotel but there is no footbridge linking to two sites.

DR05 - Comparative Assessment Report

Extra MSA Group

M62 J11 Warrington Services

Comparative Assessment Update of Alternative Sites

Revision C February 2022



Revision Record

Revision Reference	Date of Revision	Nature of Revision	Author	Checked By
B	18/02/2022	Respond to DR/Gj comments	HL	DR
C	21/02/2022	Final	DR	JR

Report Author	
Report Date	February 2022
Project No.	4151
Document Ref.	P0-TP-SPA-RP-P4151-0028-C
Revision	C

Contents

Revision Record 2

1. Introduction 4

2. Site Updates: Site 6 and Site 7 6

3. Additional Site Assessments..... 22

4. Summary and Conclusions..... 42

Appendices 48

Appendix 1 – Site 6, Junction 11A South East Quadrant..... 49

Appendix 2 – Site 7, Junction 11A South West Quadrant..... 87

Appendix 3 – Site 8, Junction 21 of the M6..... 110

Appendix 4 – Site 9, Junction 23 of the M6..... 129

**Appendix 5 – Site 10, Highways Depot Rob Lane, South of Junction 23, M6
..... 152**

Appendix 6 – Site 11, Junction 7/8 of the M56 Tatton 165

I. Introduction

- 1.1. A need has been identified by National Highways to provide an additional Motorway Service Area (MSA) on the M6 / M62 / M60 / M58 / M67 corridors of the Strategic Road Network in the North West of England. Spawforths in conjunction with i-Transport were instructed on behalf of Extra MSA Group to undertake a Need and Alternative Sites Assessment (CDI.1.21) in order to identify the most appropriate location upon which to locate a new MSA to meet the identified need. This was submitted alongside the Planning Application for a new MSA at Junction 11 of the M62.
- 1.2. Following the refusal of planning permission for the new MSA at Junction 11 of M62, this Comparative Assessment Update of Alternative Sites has been undertaken to address matters raised by respondents / objectors in relation to the Alternative Sites. The Council did not object to the conclusions of the Need and Alternative Sites Assessment. This Comparative Assessment Update of Alternative Sites should be read along side the Need and Alternative Site Assessment, Mr Jones Proof of Evidence which responds to any matters in relation to the need for an MSA and the identification of the optimal search area, and Mr Rolinson's Proof of Evidence.
- 1.3. This Comparative Assessment Update provides an update for Sites 6 and 7 which are located to the east of Junction 11 of the M62 and which would be accessed by a new M62 junction, which we identify as proposed Junction 11 A. The Comparative Assessment Update also assesses the following additional sites, which have been identified by respondents to the Planning Application and Appeal:
 - J21 of the M6 Motorway (Peel);
 - J23 of the M6 Motorway (Haydock)
 - National Highways Depot off M6, Rob Lane; and
 - J7/8 of the M56 Motorway (Tatton Services).

1.4. The Comparative Assessment of each site focuses on four tests as identified within a recent Inspectors decision for an MSA at Chalfont St Peter (CD4.1 – paragraph 80). These include:

- *“Whether they will cause less harm (Green Belt and other)”;*
- *“Whether they would meet the need just as well or better”;*
- *“Whether the other benefits are comparable or greater”;* and
- *“Crucially, whether they are likely to be deliverable :*

1.5. Accordingly, the comparative assessments for each site consider the harm to the Green Belt, other harms, the ability of the sites to meet the need as defined within Mr Jones Proof, whether the sites are deliverable, including any issues affecting the timing of schemes coming forward, and the benefits of the site/MSA scheme. Separate appendices accompany each of the site assessments, and provide extracts of relevant assessments, reports, decisions and plans.

Structure of the Report

Section 2 Updates the high level assessment of Site 6 – Junction 11A, South East Quadrant and Site 7- Junction 11A, South West Quadrant, responding to any updates in the Policy position and matters raised by respondents.

Section 3 Provides a high level assessment the four additional Sites: Junction 21; Junction 23; HE Depot off M6, Rob Lane; and J7/8 of the M58 Motorway. The methodology is consistent with the Alternative Sites Assessment and takes into account location, planning, highways and engineering, and environmental constraints.

Section 4 Summarises the findings of the report and concludes the assessment.

Appendices The high level assessments are accompanied by appendices which provide the relevant extracts to policies, assessments, and decisions.

2. Site Updates: Site 6 and Site 7

- 2.1. In response to the Appeal, a number of respondents have made objections. Peel have made comments on the Alternative Site Assessment with specific reference to Site 6 and 7, and their land at Junction 23 of the M6 which will be considered within Chapter 3 of this Comparative Assessment Update.
- 2.2. An MSA at Site 6 or 7 would be an off-line MSA that would need a new junction on the M62, which the ASA referred to as Junction 11A. The Peel Objection (paragraph 3.32) asserts that “*work is ongoing to establish the delivery of the junction and the timescales for doing so*”. This accords with the conclusion in our original ASA (CD1.1.21), which confirms that there is no detailed evidence to demonstrate that this new junction has been designed, tested, costed or indeed is deliverable. Peel have provided no updated evidence of progress since the original ASA was completed in August 2019.
- 2.3. The Transport Supporting Statement submitted by Peel to support their representations to the Greater Manchester ‘Places for Everyone’ Plan (PfE reference 10.07.60) (refer to extract in Appendix 1, Figure A1.28) sets out that the potential access arrangements into the proposed Port Salford site could be delivered in a phased manner. It states that access could be provided from the A57 in advance of a new connection to the M62. The Topic Paper for Port Salford, (reference ‘Places for Everyone’ 10.07.71, with extract appended in Appendix 1, Figure A1.31), summarises the latest ‘Locality’ assessments. It notes that whilst it has modelled the potential for a link to the M62 “*However, the nature of infrastructure interventions will be subject to further engagement, strategy and design work between stakeholders including Highways England GMCA / TfGM, Salford City Council and developers. There is the potential for alternative highways infrastructure proposals to be developed that could similarly mitigate the transport impacts of the proposed expansion of Port Salford. Further work will be needed to confirm the details of any infrastructure package to support delivery of the allocation, but the final package should ensure that the impact on the local and strategic highway network, as well as on broader environmental and social priorities, is acceptable. Discussions should*

continue with the relevant parties to identify and deliver the most appropriate solution.”
paragraph 10.8.


- 2.4. Whilst the Greater Manchester *‘Places for Everyone’* Plan has identified the potential for a new motorway junction adjacent to Port Salford, such a new junction is tied into the outcome of the *‘Places for Everyone’* process and also the *‘North West Quadrant Study’*. Spawforths understand that the *‘Places for Everyone’* process will take until at least the end of 2023 to be adopted and the *‘North West Quadrant Study’* timescale is similar. National Highways have indicated (refer to extract in Figure A1.34) that the *‘North West Quadrant Study’* project will continue to identify packages of smaller schemes that can be developed which may include remodeling at M60 junctions 12, 3 & 14, linking the M62 to the A57 and capacity improvements between J9 and 10.
- 2.5. Spawforths are not aware of any public commitment to the delivery of a new Junction 11A from National Highways or any detailed new junction designs or evidence that detailed feasibility and design work has been undertaken. The evidence highlighted above demonstrates that a range of options are still being considered. Following the adoption of the *‘Places for Everyone’* and the completion of the *‘North West Quadrant Study’*, which at the earliest would be in 2023, Mr Jones has concluded that in his experience it is reasonable to assume that planning and procurement processes to deliver such a new junction would mean that an MSA would not be open for use until the medium term (i.e. at least 5 years away) from that date.
- 2.6. The need for a new junction has not therefore been confirmed and alternatives to it are still being evaluated. The planning document (*Places for Everyone*) upon which the Port Salford extension relies to justify the new junction remains in draft and will be subject to Examination in Public. The need for a new Junction is not explicitly referred to in the draft Port Salford policy. Even if the need for a new junction is confirmed, Peel have provided no evidence of funding or viability of this junction. The above therefore reconfirms the view of the ASA that Sites 6 and 7 which rely upon the delivery of this new junction are not able to accommodate an MSA in the short term.

2.7. Notwithstanding the significant delivery constraint highlighted above, an updated Comparative Assessment has been undertaken for Site 6 (Junction 11A, South East Quadrant) and Site 7 (Junction 11A, South West Quadrant). The Comparative Assessment is completed having regard to four tests as identified within a recent Inspectors decision for an MSA at Chalfont St Peter (CD4.1 – paragraph 80). These include:

- *“Whether they will cause less harm (Green Belt and other)”*;
- *“Whether they would meet the need just as well or better”*;
- *“Whether the other benefits are comparable or greater”*; and
- *“Crucially, whether they are likely to be deliverable :*

2.8. Accordingly the comparative assessments for each site consider the harm to the Green Belt, other harms, the ability of the sites to meet the need as defined within Mr Jones Proof, whether the sites are deliverable, including any issues affecting the timing of schemes coming forward, and the benefits of the site/MSA scheme. Separate appendices accompany each of the site assessments, and provide extracts of relevant assessments, reports, decisions and plans. References to relevant extracts are provided within the assessment tables.

Site 6 – Junction I I A South East Quadrant

Tests	Comment
Site Location	
Test 1	Harm to the Green Belt and Other Harms
Green Belt Harm	<p>The Site lies within the Green Belt in the adopted Salford Unitary Development Plan.</p> <p>A Green Belt Assessment has been undertaken to inform 'Places for Everyone'. Relevant extracts of the various stages of Green Belt Assessment are included within Appendix 1 Figures A1.2 to A1.14b.</p> <p>The Greater Manchester Green Belt Assessment, 2016 identifies the Site as falling within Strategic Area 7. The Strategic Area as a whole is assessed as performing a moderate-strong role against purpose 1, strong for purpose 2, moderate - strong for purpose 3 and weak for purpose 4 (refer to Appendix 1, Figures A1.2 and A1.3). The 2016 study assesses a number of smaller parcels. Site 6 lies within parcels SA30 and SA32. The 2016 study assesses SA30 as making a strong - moderate contribution to purpose 1, a weak contribution to purpose 2 and a moderate contribution towards purpose 3. The western part of Site 6 falls within the eastern part of SA32. This is assessed as having a strong contribution towards purpose 1, a moderate role in purposes 2 and 3 and as with SA30,</p>

	<p>both parcels are not considered to make a contribution towards purpose 4. See Appendix I Figure A1.4.</p> <p>The Stage 2 Assessment of Proposed 2019 GMSF Allocations, September 2020 identifies the area of land within this Site as being the subject of Policy JP allocation 29. This Site is identified as having moderate harm to Green Belt. Refer to Appendix I Figures A1.13b and A1.14b.</p> <p>The Site remains within the designated Green Belt in the adopted development plan.</p>
Other Harms	<p>Flood Risk: The Site lies within Flood Zone I. Refer to Figure A1.35. Part of the Site is at Risk of Flooding from Reservoirs. Refer to Figure A1.36</p> <p>Ecological and Biological: The Site is within the Astley and Bedford Mosses SSSI Impact Risk Zone, with the SSSI lying 3.2 km to the north west.</p> <p>The Manchester Mosses SAC lies approximately 3.2 km to the north west.</p> <p>Foxhill Glen is identified as a Site of Biological Importance, this is located circa 300m from the boundary with Barton Moss Road. Refer to Figure A1.37</p> <p>Public Open Space and Recreation: Boysnope Park Golf Club is identified as an Open Green Space site, part of which falls within the south western section of the Site. Refer to Figure A1.15.</p> <p>Eccles Definitive Footpath 31 and 30 traverse the Site.</p> <p>Agricultural Land Classification: The Site is identified as being Grade 1, Grade 2 and Grade 3 Agricultural Land. Refer to Figure A1.40</p> <p>Heritage Assets: Grade II Listed buildings, including the Control Tower, Office and Main Hangar and Workshops at Barton Aerodrome are located approx. 510 – 660m from the boundary of the Site on Barton Moss Road, and 940 m the north eastern</p>

	boundary with the M62 and from 420 m with the south eastern boundary. Refer to Figure A1.25.
Highways Safety and Impact on the Road Network	Impacts: Likely to be acceptable, subject to identifying an appropriate package of mitigation measures.
Test 2	Meeting the Identified Need
Meeting the Identified Need.	<p>The Site is located within the 'Optimal Search Area' as defined in the Need and Alternative Sites Assessment (CD1.1.21), and within Mr Jones's Proof.</p> <p>The Site is therefore capable of meeting all four gaps identified in Mr Jones's Proof, and as identified within the Highways Agency: Spatial Planning Framework Review of Strategic Road Network Service Areas, 2010 (CD3.13).</p>
	<p>The Plans in Appendix 1, Figure A1.30 and A1.32, provide an indicative layout for Site 6 and Site 7, as promoted by the landowner. These illustrate the potential for 1,600 sq. m to 3,000 sq. m of ancillary floorspace. No MSA is proposed within these plans by the landowner. The ancillary floorspace is illustrated to be located away from the boundary with the M62 and hence would not meet the Circular 02/2013 requirements for an MSA.</p>
Test 3	Deliverability
Highways, Engineering, Safety and Operational Issues	<p>The landowner is not promoting an on-line MSA. An off-line MSA would require a new Junction (Junction 11A) as noted above.</p> <p>The Transport Supporting Statement on behalf of Peel, 2019 (10.07.60) indicates the potential for the access arrangements to be delivered in a phased manner, with access from the A57 in advance of the connection to the M62. Refer to Figure A1.28.</p> <p>The Topic Paper for Port Salford, PFE reference 10.07.71 summarises the latest 'locality' assessments and whilst it has modelled the potential for a link to the M62 it goes onto state "However, the nature of infrastructure interventions will be subject to further engagement, strategy and design work between stakeholders including Highways England GMCA/TfGM, Salford City Council and</p>

	<p><i>developers. There is the potential for alternative highways infrastructure proposals to be developed that could similarly mitigate the transport impacts of the proposed expansion of Port Salford. Further work will be needed to confirm the details of any infrastructure package to support delivery of the allocation, but the final package should ensure that the impact on the local and strategic highway network, as well as on broader environmental and social priorities, is acceptable. Discussions should continue with the relevant parties to identify and deliver the most appropriate solution” [10.07.71, PfE Site Allocation Topic Paper – JPA29 Port Salford para 10.8, Refer to Figure A1.31].</i></p> <p>Thus at this stage there is no certainty in relation to the most appropriate solution to mitigate the traffic from Port Salford and hence there is no firm commitment to deliver a Junction and there is no detailed design, costing or delivery information (in the public domain).</p> <p>This position is reflected in Peels Objection to the Appeal Scheme, dated January 2022 (refer to Figure A1.33), and subsequently within the recently published Regulation 22 Consultation Statement, a PfE submission document, (refer to Figure A1.33a).</p>
Flood Risk	As indicated above the Site is within Flood Zone 1.
Other Constraints	<p>The Site is Green Belt within the adopted Salford Unitary Development Plan. Refer to Figure A1.16 and A1.17, the latter providing an extract of Salford’s Publication Local Plan.</p> <p>‘Places for Everyone’, Submission Draft, 2022 identifies that this site could be released from the Green Belt for employment purposes, forming an expansion to Port Salford (proposed Policy JP Allocation 29. Figure A1.21).</p> <p>The emerging policy (see Figure A1.21) identifies the site as capable of accommodating 320,000 sq. m of employment floorspace. The development requirements state that the development should not commence until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford Scheme south of the A57 have been completed and are operational. The north eastern extent, is</p>

	<p>proposed to remain within the Green Belt. <i>'Places for Everyone'</i> was submitted to in Feb 2022.</p> <p>The justification for the release of JP Allocation 29 from the Green Belt, in addition to the wider strategic <i>'exceptional circumstances'</i>, is set out within <i>'Places for Everyone'</i>, Green Belt Topic Paper and case for Exceptional Circumstances, July 2021 (07.01.25). It states that the justification relates to the proximity to the tri-modal connections, to be provided as part of the first phase of the Port Salford, to the south of the A57, the ability to provide employment opportunities near to relatively deprived communities, contributions to the business case to extend the Metrolink over the Manchester Ship Canal; and <i>"the provision of 320,000 square meters of logistics floorspace, making a significant contribution to the employment supply across Greater Manchester and support the delivery of a larger and more sustainable logistics sector"</i>, refer to Figure A1.23 and A1.24.</p> <p>The delivery of an MSA does not form part of the identified Exceptional Circumstances.</p>
MSA Operator Interest	The Site is being promoted by Peel. There is no MSA operator supporting the site, and a deliverable scheme has not been developed to date.
Test 4	Benefits
Economic Benefits	<p>The delivery of an MSA will provide jobs, it is anticipated that if a scheme was brought forward for this site, the economic benefits on a quantitative level would be broadly comparable, with an MSA at the Appeal Site.</p> <p>However, delivery of an MSA could prejudice the achievement of the objectives of the emerging <i>'Places for Everyone'</i> Plan, and the achievement of the 320,000 sq. m of employment land within Policy JP allocation 29. Appendix I, Figure. A1.21.</p>
Other Benefits	At present there is no MSA scheme to assess any wider benefits of an MSA at this location.

Conclusion

Since the Site lies within the Green Belt, then the development of an MSA would be considered to be *'inappropriate'* development and as such, *'very special circumstances'* would need to be demonstrated to show that the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Development of an MSA in this location could have an adverse impact upon the *'openness'* of the Green Belt in this location as well as adverse impact upon two of the purposes of Green Belt (unrestricted sprawl of large built up areas; and safeguarding countryside from encroachment). The evidence to support the *'Places for Everyone'* Plan considers that the release of the site as a whole would constitute relatively significant sprawl, and encroachment onto the countryside resulting in **Moderate Green Belt harm**. Refer to Figure A1.13a and A1.13b.

The release of the site would impact upon open space provision, resulting in the loss or partial loss of Boysnope Park Golf Club, which would require additional justification and compensation, as required by proposed development requirement 11 of proposed Policy JP Allocation 29, see Figure A1.21.

An MSA in this location, would be within the Optimal Search Area, and would be capable of meeting the identified need for MSA. However, as summarised below, there are some significant challenges to the deliverability of the site.

The site is proposed to be allocated for employment uses (320,000 m²) to take advantage of the new port facilities, rail link and highway improvements that have to be completed as part of Port Salford. The Explanatory Text in 11.262 of the Submission version of *'Places for Everyone'* states that *"Port Salford will be one of the most market-attractive locations in the country for industrial and warehousing development...offering the type of site that can compete with locations internationally for investment"* refer to Figure A1.22. It further considers that the transport connections mean that the location is particularly attractive for logistics activities, but high quality manufacturing could also be provided in order to diversity the employment and investment opportunities, in this part of Greater Manchester.

The case for exceptional circumstances to support the release of the Site from the Green Belt is based on the strategic needs for employment, the opportunity for tri-modal connectivity and the supply of employment land, with specific reference to logistics. It does not include the need for an MSA.

The Port Salford Transport Supporting Statement, Peel 2019 (10.0760), identifies the options promoted by Peel that have been assessed. Option I aligns with the emerging allocation, and is based on the delivery of circa 356,000sqm of Employment floorspace, consistent with the exceptional circumstances identified for the release of the Green Belt, refer to Figure A1.27, and A1.29. This does not include an MSA within the site/land proposed to be released from the Green Belt.


The above assessment shows that the 'Places for Everyone' process has identified the potential for a new motorway junction adjacent to this site (Figure A1.20) but that such a new junction is tied into the 'Places for Everyone' process and the 'North West Quadrant Study' (Figure A1.18).

The 'Places for Everyone' process is expected to take until at least the end of 2023 to be adopted and the 'North West Quadrant Study' is of a similar timescale. There are no detailed new junction designs in the public domain and there is no evidence that such detailed feasibility and design work has been undertaken. Indeed it is clear from both National Highways and PfE and Peel that a range of options are being considered Figure A1.31, A1.34 and A1.33.

From the adoption of the 'Places for Everyone' and the completion of the 'North West Quadrant Study' in 2023, it is reasonable to assume that planning and procurement processes to deliver such a new junction would mean that an MSA would not be open for use until the medium term (i.e. at least 5 years away). The Port Salford Transport Statement, 2019 indicates the potential for a phased approach to the delivery of the requisite transport infrastructure, commencing at the A57 prior to the completion of the works to the junction with the M62.

On this basis any potential that this off-line site may have for an MSA cannot be progressed until the uncertainty created by the 'Places for Everyone' proposal and the 'North West Quadrant Study' is completed in 2023. If such a new Junction is supported then an MSA would be unlikely to be available until the medium term. Notwithstanding the timescale for delivery of the new Junction, the site is seen as being strategically important as an extension to Port Salford and hence this site is only being supported as an expansion to Port Salford, and this forms the basis for the Exceptional Circumstances to justify the release of the site from the Green Belt.

Site 7 – Junction IIA South Western Quadrant

Tests	Comment
Site Location	
Test I	Harm to the Green Belt and Other Harms
Green Belt Harm	<p>The site lies within the Green Belt in the adopted Salford Unitary Development Plan, and is proposed to be retained within the Green Belt in the emerging Plan.</p> <p>A Green Belt Assessment has been undertaken to inform '<i>Places for Everyone</i>'. Relevant extracts of the various stages of Green Belt Assessment are included within Appendix 2 Figures A2.2 to A2.8</p> <p>The Greater Manchester Green Belt Assessment, 2016 identifies the Site as falling within Strategic Area 7. The Strategic Area as a whole is assessed as performing a moderate-strong role against purpose 1, strong for purpose 2, moderate-strong for purpose 3 and weak for purpose 4. Refer to Appendix 2, Figures A2.2 and A2.3. The 2016 study assesses a number of smaller parcels. Site 6 lies within Parcel SA32. This is assessed as having a strong contribution towards purpose 1, a moderate role in purpose 2 and</p>

	<p>3 and is not considered to make a contribution towards purpose 4. See Appendix 2 Figure A2.4.</p> <p>The Stage 2, Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions, September 2020 states that the release of allocations within Strategic Area 7 would constitute urban sprawl. The remaining Green Belt, within Strategic Area 7, is concluded to play a role in checking the unrestricted sprawl of Irlam, Leigh, Astley and Eccles and contribute towards maintaining the separation of settlements around the fringes, as well as settlements located outside the Greater Manchester boundary. The cumulative assessment concludes that the release of allocations would encroach on the countryside, the majority of the remaining area would however continue to safeguard the countryside from encroachment. It is also noted within the assessment that the area is generally open but contains some urbanising development and is surrounded by the urban edge. Refer to Figure A2.8.</p> <p>Land within this site, is proposed to be retained within the Green Belt. 'Places for Everyone' Submission Draft (Paragraph 11.264) considers that the retention of the Green Belt to the west of JP Allocation 29 Port Salford will help to prevent the coalescence of Irlam and Eccles, noting the importance of making positive use of the Green Belt at this location. Refer to Figure A2.13. The Publication draft PfE, is the version of the Plan that was submitted on 14th February 2022.</p>
Other Harms	<p>Flood Risk: The site lies within Flood Zone 1. Refer to Figure A2.24, The South eastern corner of the site is at risk of flooding from reservoirs. Refer to Figure A2. 25. Pockets of the site are liable to surface water flooding. Refer to Figure A2.25a.</p> <p>Ecological and Biological: The site is within the Astley & Bedford Mosses SSSI Impact Risk Zone, which is approx. 2.9km to the north-west and the Manchester Mosses SAC lies approx. 2.9km to the north-west, at the nearest point. Refer to Figure A2.26. Woodland North of Moss Farm is identified as a Site of Biological Importance and is located 480 m from the site at its nearest point. Twelve Yards Road Site of Biological Importance is located circa 1 km to the north west of the site, Botany Bay Wood Site of</p>

	<p>Biological Importance is circa 1.4 km to the north west of the site, refer to Figure A2.26.</p> <p>Public Open Space and Recreation: Boysnope Park Golf Club is identified as an Open Green Space site. Refer to Figure A2.9. Eccles Definitive Footpath 32 is within the site.</p> <p>Agricultural Land Classification: The site is identified as being Grade 1, Grade 2 and Grade 3 Agricultural Land. Refer to Figure A2.29.</p> <p>Heritage: Grade II Listed buildings at Barton Aerodrome (Office, Main Hangar and workshops, and Control Tower) are located approx. 1.1 to 1.3 km from the northern boundary of the site. Yew Tree Farmhouse is located 1.1km to the south east of the site. Refer to Figure A2.15.</p>
Highways Safety and Impact on the Road Network	Impacts: Likely to be acceptable, subject to identifying an appropriate package of mitigation measures.
Test 2	Meeting the Identified Need
Meeting the Identified Need.	<p>The site is located within the ‘<i>Optimal Search Area</i>’ as defined in the Need and Alternative Sites Assessment CD1.1.21, and with Mr Jones’s Proof.</p> <p>The site is therefore capable of meeting all four gaps identified in Mr Jones’s Proof, and as identified within the Highways Agency: Spatial Planning Framework Review of Strategic Road Network Service Areas, 2010 (CD3.1.3(n)).</p>
	<p>The Plans in Appendix 1, Figure A2.19 and A2.21 provide an indicative layout for Site 6 and Site 7, as promoted by the landowner. These illustrate the potential for 1,600 sq. m to 3,000 sq. m of ancillary floorspace. No MSA is proposed within these plans by the landowner. The ancillary floorspace is illustrated to be located away from the boundary with the M62 and hence would not meet the Circular 02/2013 requirements for an MSA.</p>

Test 3	Deliverability
<p>Highways, Engineering, Safety and Operational Issues</p>	<p>The landowner is not promoting an on-line MSA. An off-line MSA would require a new Junction (Junction 11A).</p> <p>The Transport Supporting Statement on behalf of Peel, 2019 (10.07.60) indicates the potential for the access arrangements to be delivered in a phased manner, with access from the A57 in advance of the connection to the M62. Refer to Figure A2.18.</p> <p>The Topic Paper for Port Salford, PfE reference 10.07.71 summarises the latest 'locality' assessments and whilst it has modelled the potential for a link to the M62 it goes onto state "However, the nature of infrastructure interventions will be subject to further engagement, strategy and design work between stakeholders including Highways England GMCA/TfGM, Salford City Council and developers. There is the potential for alternative highways infrastructure proposals to be developed that could similarly mitigate the transport impacts of the proposed expansion of Port Salford. Further work will be needed to confirm the details of any infrastructure package to support delivery of the allocation, but the final package should ensure that the impact on the local and strategic highway network, as well as on broader environmental and social priorities, is acceptable. Discussions should continue with the relevant parties to identify and deliver the most appropriate solution" [10.07.71, PfE Site Allocation Topic Paper – JPA29 Port Salford para 10.8, Refer to Figure A2.20].</p> <p>Thus at this stage there is no certainty in relation to the most appropriate solution to mitigate the traffic from Port Salford and hence there is no firm commitment to deliver a Junction and there is no detailed design, costing or delivery information (in the public domain).</p>
<p>Flood Risk</p>	<p>As indicated above the site is within Flood Zone 1.</p>
<p>Other Constraints</p>	<p>An overhead power line and transmission towers are located within the site, dissecting the site in a north west to south east direction. Refer to Figure A2.28.</p> <p>As indicated above the site is Green Belt within the adopted Salford Unitary Development Plan. Refer to Figure A2.10 and A2.11, the latter providing an extract of Salford Publication Local Plan,</p>

	<p>‘Places for Everyone’, Submission Draft, 2022 identifies this site as being retained within the Green Belt. ‘Places for Everyone’ [Paragraph 11.264] considers that the retention of the Green Belt to the west of JP Allocation 29 Port Salford will help to prevent the coalescence of Irlam and Eccles, noting the importance of making positive use of the Green Belt at this location. The Publication Draft Plan, forms the Submission version of the Plan submitted on 14th February 2022.</p>
MSA Operator Interest	<p>The Site is being promoted by Peel. There is no MSA operator, and a deliverable scheme has not been developed to date.</p>
Test 4	Benefits
Economic Benefits	<p>The delivery of an MSA will provide jobs, it is anticipated that if a scheme was brought forward for this site, the economic benefits on a quantitative level would be broadly comparable, with an MSA at the Appeal Site.</p>
Other Benefits	<p>There is no scheme to assess any wider benefits of an MSA at this location.</p>
Conclusion	
<p>Since the site lies within the Green Belt, then the development of an MSA would be considered to be <i>‘inappropriate’</i> development and as such, <i>‘very special circumstances’</i> would need to be provided to show that the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>Development of an MSA in this location could have an adverse impact upon the openness of the Green Belt in this location as well as adverse impact upon two of the purposes of Green Belt (unrestricted sprawl of large built up areas; and safeguarding countryside from encroachment).. The supporting evidence for ‘Places for Everyone’ and ‘Places for Everyone’ itself, considers that the retention of the Green Belt to the west of JP Allocation 29 will help prevent the coalescence of Irlam and Eccles (Refer to Figure A2.13), noting that the importance of making positive use of the Green Belt at this location. The Cumulative Assessment concludes that the remaining area of Green Belt, which incorporates this site, would continue to</p>	

safeguard the countryside from encroachment. Refer to Figure A2.7 and A2.8b.

The release of the site would impact upon open space provision, resulting in the loss or partial loss of Boysnope Park Golf Club, which would require additional justification and compensation, as required by proposed development requirement 11 of proposed Policy JP Allocation 29, see Figure A1.21.

An MSA in this location, would be within the '*Optimal Search Area*', and would be capable of meeting the identified need for MSA. However, as summarised below, there are some significant challenges to the deliverability of the site, at least within the short term.

The above assessment shows that the '*Places for Everyone*' process has identified the potential for a new motorway junction adjacent to this site, Figure A2.12, but that such a new junction is tied into the '*Places for Everyone*' process and the '*North West Quadrant Study*' Figure A2.16.

The '*Places for Everyone*' process is expected to take until at least the end of 2023 to be adopted and the '*North West Quadrant Study*' is of a similar timescale. There is no detailed new junction designs in the public domain and there is no evidence that such detailed feasibility and design work has been undertaken. Indeed it is clear from both National Highways and PfE and Peel a range of options are being considered Figure A2.16, A2.20 and A2.23.

From the adoption of the '*Places for Everyone*' and the completion of the '*North West Quadrant Study*' in 2023, it is reasonable to assume that planning and procurement processes to deliver such a new junction would mean that an MSA would not be open for use until the medium term (i.e. at least 5 years away). The Port Salford Transport Statement, 2019 indicates the potential for a phased approach to the delivery of the requisite transport infrastructure, commencing at the A57 prior to the completion of the works to the junction with the M62.

On this basis any potential that this off-line site may have for an MSA cannot be progressed until the uncertainty created by the '*Places for Everyone*' proposal and the '*North West Quadrant Study*' is completed in 2023. If such a new Junction is supported then an MSA would be unlikely to be available until the medium term.

3. Additional Site Assessments.

3.1. In response to the Planning Application and to the Appeal, respondents have suggested some alternative sites to the Appeal Site. The suggested additional alternative sites are as follows:

- J21 of the M6 Motorway (Peel), Site 8;
- J23 of the M6 Motorway, Haydock (Peel), Site 9;
- National Highways Depot Rob lane, off M6, Site 10; and
- J7/8 of the M56 Motorway (Tatton Services), Site 11.

3.2. None of these Sites are located within the ‘*Optimal Search Area*’, and therefore none are capable of meeting all four identified gaps and therefore they were not included within the original Needs and Alternative Site Assessment. Whilst none of these sites are identified within the ‘*Optimal Search Area*’, for completeness an assessment has been undertaken.

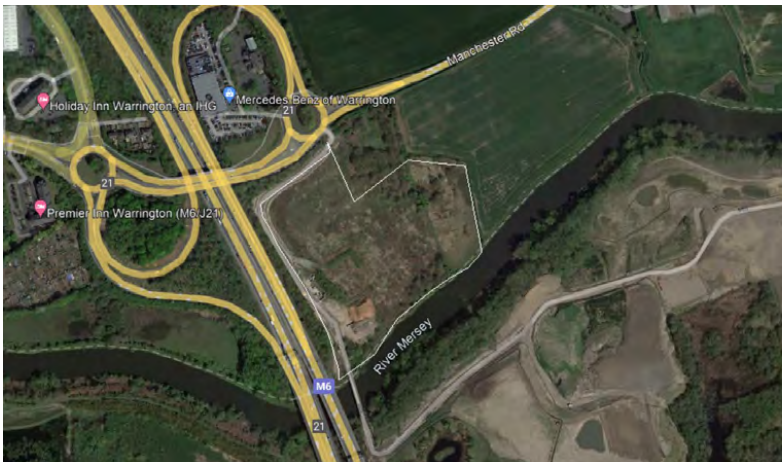
3.3. All four sites lie within the Green Belt. Only the J7/8 of the M56 Motorway site is being promoted / supported by an MSA operator and this MSA operator has not objected to the Appeal application.

3.4. The Comparative Assessment of each site focuses on four tests as identified within a recent Inspectors decision for an MSA at Chalfont St Peter (CD 4.1 – paragraph 80). These include:

- “*Whether they will cause less harm (Green Belt and other)*”;
- “*Whether they would meet the need just as well or better*”;
- “*Whether the other benefits are comparable or greater*”; and
- “*Crucially, whether they are likely to be deliverable* :

3.5. Accordingly the comparative assessments for each site consider the harm to the Green Belt, other harms, the ability of the sites to meet the need as defined within Mr Jones’s Proof, whether the sites are deliverable, including any issues affecting the timing of schemes coming forward, and the benefits of the site/MSA scheme. Separate appendices accompany each of the site assessments, and provide extracts of relevant assessments, reports, decisions and plans.

Site 8: Junction 21 of the M6


Tests	Comment
Site Location	
Test 1	Harm to the Green Belt and Other Harms
Green Belt Harm	<p>This site has been subject to an appeal in 2002 in relation to its development for MSA Appeal Reference: APP/M0655/V/00/000199&200 (planning application reference 95/34089). The Secretary of State agreed with the Inspectors report and concluded that the appeal scheme would seriously damage the openness of the Green Belt and its visual amenity. Figure A3.9.</p> <p>To support the preparation of the emerging Local Plan Warrington Borough Council have undertaken a Green Belt Assessment. The 2016 Green Belt Assessment, identified the site as being located within General Area 23. Figure A3.2. This area was assessed as making a strong contribution towards the purposes of the Green Belt, refer to Figure A3.3.</p>

	<p>The assessment defines a series of parcels within the General Areas. The site is identified within WR 24 (Figure A3.4) and is assessed as having a moderate contribution towards the Green Belt (Figure A3.5). The site was assessed as R18/135 in 2017, refer to Figure A3.8. It is assessed as making a weak contribution to purposes 1 and 2, but having a strong contribution to purpose 3, no contribution to purpose 4 and a moderate contribution to purpose 5. Overall it is assessed as making a moderate contribution to the purposes of the Green Belt.</p>
Other Harms	<p>Flood Risk: The site lies within Flood Zone 1. Refer to Figure A3.19. The site is at risk of flooding from reservoirs. Refer to Figure A3.20.</p> <p>Ecological and Biological: The site is adjacent to a SSSI, and within the SSSI Buffer Zone (Woolston Eyes - Eastern Site). It is 2 km from Rixton Clay Pits SSSI and SAC and circa 2.1 km from Risley Moss (Manchester mosses) SAC and SSSI. Refer to Figures A.21 and A3.22.</p> <p>Public Open Space and Recreation: A public right of way runs along the eastern and southern edge of the site. The emerging Warrington Local Plan indicates that the site is within a Strategic Green Link, as well as being retained in the Green Belt.</p> <p>Agricultural Land Classification: The site is identified as being predominantly Grade 2. Refer to Figure A3.25.</p> <p>Heritage Assets: The site is circa 630 m from a Grade II Listed Milestone on the Manchester Road. The site is circa 680m from the locally listed Holly Bush Farm House. Refer to Figure A3.16.</p>
Highways Safety and Impact on the Road Network	<p>In relation to appeal APP/M0655/V/00/000199&200 in 2002, the Secretary of State agreed <i>"with the Inspector that the Proposed Junctions to provide access to the MSA at Junction 21 would operate satisfactorily, and that internal circulation would be safe. He also agrees that access would be inconvenient for northbound traffic and for the occupants of dwellings on the cul-de-sac that is part of Old Manchester Road, and this tells against the Junction 21 proposal"</i></p> <p>In paragraph 13.82 the Inspector concluded that <i>"the inconvenience expected would often persuade drivers not to use the services. The</i></p>

	<p><i>potential of the MSA to contribute towards safer motorways could thus be somewhat thwarted and this is a strong argument against the use of this land for the proposed purpose” and in paragraph 13.84 the Inspector concluded that “the inconvenience of access to the MSA, especially for northbound traffic, is a very serious disadvantage and tells against the proposal”. Refer to Figure A3.18.</i></p>
Test 2	Meeting the Identified Need
Meeting the Identified Need.	<p>The site is not located within the ‘<i>Optimal Search Area</i>’ as defined in the Need and Alternative Sites Assessment (CD1.1.21), and within Mr Jones’s Proof.</p> <p>The site is therefore not capable of meeting all four gaps identified in Mr Jones’s Proof, and as identified within the Highways Agency: Spatial Planning Framework Review of Strategic Road Network Service Areas, 2010 (CD3.1.3(n)).</p>
Test 3	Deliverability
Highways, Engineering, Safety and Operational Issues	<p>Mr Jones noted that the western dumbbell roundabout at M6, J21 currently experiences delays during peak hours when part-time signals are used when needed. There is a potential requirement for some junction improvements in order to facilitate the development of an MSA.</p>
Flood Risk	<p>Approximately half of the site is within Flood Zone 2 and part of the site is within Flood Zone 3. The eastern edge of the site is liable to surface water flooding. The whole site is liable to flooding from reservoirs when the rivers are also flooding. Refer to Figures A3.19 and A3.20.</p>
Other Constraints	<p>The site is identified as a construction landfill site. The Council’s Site Assessment (Figure A3.12) and Figure A3.23 highlight the potential for contamination, with the former indicating that remediation is required.</p>
MSA Operator Interest	<p>There is no known MSA operator currently promoting this site. There is no current MSA scheme for the site. Peel Holdings have proposed the site through the Local Plan process for employment and/or as an MSA. Figure A3.13 and A3.14. The LPA have not identified the site for employment or MSA use in their draft Local Plan. Refer to Figure A3.15.</p>

Test 4	Benefits
Economic Benefits	The delivery of an MSA will provide jobs, it is anticipated that if a scheme was brought forward for this site, the economic benefits on a quantitative level would be broadly comparable, with an MSA at the Appeal Site.
Other Benefits	There is no MSA scheme to assess any wider benefits of an MSA at this location.
Conclusion	
<p>Since the site lies within the Green Belt, then the development of an MSA would be considered to be <i>'inappropriate'</i> development and as such, <i>'very special circumstances'</i> would need to be provided to show that the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>Development of an MSA in this location could have an adverse impact upon the openness of the Green Belt in this location as well as adverse impact upon two of the purposes of Green Belt (unrestricted sprawl of large built up areas; and safeguarding countryside from encroachment). The site is proposed to be retained in the Green Belt within the emerging Warrington Local Plan, which considers it makes a moderate contribution to the Green Belt purposes.</p> <p>MSA use of the site has previously been dismissed with the Inspector concluding that there would be significant harm to the Green Belt, and when comparing to an alternate proposal at the time noted that the access arrangements were inconvenient.</p> <p>Furthermore the site is not located within the <i>'Optimal Search Area'</i>, and is not located on the routes that have been identified by National Highways, and cannot address the gaps as described.</p> <p>The site is located in close proximity to an SSSI, and the whole site is liable to flooding from reservoirs with part of the site falling within Flood Zone 2 and 3.</p> <p>The site has potential for contamination.</p> <p>The site is not within the control of an MSA operator and there is no current MSA scheme.</p>	

Site 9: Junction 23 of the M6, (St Helens)

Tests	Comment
Site Location	
Test 1	Harm to the Green Belt and Other Harms
Green Belt Harm	<p>St Helens Green Belt Review (December 2018) identified the site as forming sub parcel 033. Refer to Figure A4.2. The site is assessed within the Stage 1b assessment as making a High contribution to the Green Belt purposes. It states that “<i>the Parcel forms part of a wider strategic gap between Haydock and Golborne and Haydock and Ashton-in-Makerfield. Development of the Parcel would lead to the physical merging of Haydock and Ashton in Makerfield and would significantly reduce the scale and integrity of the gap between Haydock and Golborne.</i>” Figure A4.3. It notes that ordinarily such ‘High performing’ sites would be rejected and hence would be excluded from the Stage 2b Green Belt assessment. In this case however, whilst noting that there could be a high impact on the Green Belt if the site came forward, due to its potential to meet specific employment needs, it was considered that there were exceptional circumstances to justify taking the site to the Stage 2 of the assessment.</p> <p>The Stage 2 assessment noted that the site was of medium landscape sensitivity and medium visual sensitivity. It also noted congestion issues affecting the highway network and Haydock</p>

Island. Overall it was concluded to have medium development potential. Figure A4.7.

The site was proposed to be safeguarded for future potential and hence excluded from the Green Belt in the Submission Draft St Helens Local Plan. The Schedule of Proposed Local Plan Main Modifications (November 2021), maintain that the site makes a *'high overall contribution to the Green Belt purposes'*, which would not ordinarily be considered further. The Suggested Main Modifications state that there are clear harms in relation to the development of the site, including harm to the Green Belt and adverse landscape impacts. Figure 4.8.

Exceptional circumstances for the proposed safeguarded land were identified as being the *'clear need to provide sufficient employment land within the Plan period and beyond it. Given the importance of meeting such needs, coupled with the potential of the site to meet the size and locational requirements of the market, there are exceptional circumstances to safeguard this site'*. Further it states *'whilst the site did not score as well as the allocated employment site through Green Belt review, the need to make provision for employment land beyond the Plan period forms the basis for exceptional circumstances to justify the removal of this site from the Green Belt for safeguarding'*. Figure 4.8.

The landowners pursued a planning application for logistics use which was the subject of an appeal (reference APP/H4315/W/20/3256871). A public inquiry was held in which the Secretary of State dismissed the appeal application.

The Secretary of State stated in paragraph 16 that *'the development would have a very significant impact on the openness of the Green Belt. He agrees that the loss of the essential and fundamental openness of the Green Belt carries substantial weight against the appeal'*. In paragraph 17 he agrees *'that the development would cause a significant measure of harm to the purpose of the Green Belt to prevent urban sprawl and would also compromise to some extent, the purpose of preventing neighbouring towns from merging' and that development would 'encroach blatantly into the countryside'* Figure A4.13.

	<p>The Inspectors conclusions are provided in Appendix 4 Figure A4.15. In paragraph 8.8 the Inspector concludes that the development would have a very significant impact on the openness of the Green Belt. In paragraph 8.9, the Inspector concludes the landscape bunding and tree screening round the site would aggravate the obvious loss of the essential and fundamental openness of the Green Belt.</p>
Other Harms	<p>Flood Risk: The site is within Flood Zone I, Figure A4.17. There are some significant areas of surface water flooding in the centre of the site, and adjacent to the A530. Refer to Figure A4.18.</p> <p>Landscape: The Stage 3 Assessment within the Green Belt Assessment 2018 highlighted that substantial landscape buffers would be required to mitigate the visual effects of any employment development, including along the neighbouring Haydock Park Racecourse ‘a nationally important tourist attraction’. Figure A4.5. In the recent appeal the Secretary of State stated that he ‘agrees that the development would cause adverse landscape and visual impact, even taking into account extensive mitigation’ and ‘judged on the evidence, the degree of harm to the landscape would be major adverse, only becoming moderate after at least 15 years’. Figure A4.13.</p> <p>Ecological and Biological: Highfield Moss SSSI and Site of Biological Importance is located 3.2 km to south east of the site. Refer to Figure A4.19.</p> <p>Agricultural Land Classification: The site is identified as being Grade 3. Refer to Figure A4.21.</p> <p>Heritage Assets: There are a cluster of listed buildings located approx. 1.3 km north of the site. These include The Roman Catholic Church of St Oswald and St Edmund Arrowsmith (Grade II) St Oswald’s Presbytery Grade II, The Grade II Gates and Piers to St Oswald’s Church, and the Grade II Church of St Thomas. Refer to Figure A4.12.</p>
Highways Safety and	<p>The Green Belt Assessment 2018 Stage 2 indicates that there are capacity issues at Junction 23 (refer to Figure A4.7) where the</p>

Impact on the Road Network	<p>junction is noted to experience congestion and slow moving traffic. The Stage 3 Green Belt assessment noted that whilst the parcel was proposed to be allocated for employment at the Local Plan Preferred Option stage, that there were a number of issues that jeopardised its potential delivery within the Plan period. The Stage 3 Green Belt assessment states that a study has been commissioned to consider the nature and potential land take of any improvements to Junction 23. Figure A4.5.</p> <p>The Inspector for the appeal reference APP/H4315/W/20/3256871 commented in paragraph 8.34 that the wider improvements to M6 J23 remain aspirational and devoid of detailed design or funding, but he noted in paragraph 8.33 that the proposed off site highway works are the minimum required to accommodate the additional traffic generated by the development and hence the appeal proposals were acceptable in traffic terms. Refer to Figure A4.15.</p>
Test 2	Meeting the Identified Need
Meeting the Identified Need.	<p>The site is not located within the ‘<i>Optimal Search Area</i>’ as defined in the Need and Alternative Sites Assessment (CD1.1.21), and within Mr Jones’s Proof.</p> <p>The site is therefore not capable of meeting all four gaps identified in Mr Jones’s Poof, and as identified within the Highways Agency: Spatial Planning Framework Review of Strategic Road Network Service Areas, 2010 (CD3.1.3 (n)).</p> <p>Whilst the site is located on the identified routes, however a gap of in excess of 28 miles would remain on the journeys from the site to the M67 terminus.</p>
Test 3	Deliverability
Highways, Engineering, Safety and Operational Issues	<p>The Inspector for the appeal reference APP/H4315/W/20/3256871 commented in paragraph 8.34 that the wider improvements to M6 J23 remain aspirational and devoid of detailed design or funding. The Inspector noted in paragraph 8.28 that the proposed employment development would advance the works to divert the northern arm of the A49, valued at a not insignificant cost of £11.9 million. It was further</p>


	<p>stated that these offsite highways works, including the diversion of the northern arm of the A49 were the minimum required to accommodate the additional traffic generated by the development.</p> <p>No detailed highway mitigation scheme has been put forward for an MSA.</p>
Flood Risk	The Site is within Flood Zone 1, refer to Figure A4.17.
Other Constraints	<p>The site is proposed to be released from the Green Belt and safeguarded (Proposed Allocation 2ES). The Suggested Main Modifications provide the ‘exceptional circumstances’ for the release of the site from the Green Belt. This does not relate to the need for an MSA, and instead are directly attributable to the need for employment beyond the Plan period. Figure 4.11.</p> <p>The Main Modifications were developed prior to the Inspectors decision on the appeal proposals on 11/11/2021. In the appeal decision, the Secretary of State and the Inspector highlight that the site allocations of the emerging local plan were subject to objection and ongoing examination for soundness and hence they determined that the site allocations including draft allocation 2ES carried little weight (Paragraph 14, Figure A4.13. and paragraph 8.82 Figure A4.15).</p> <p>Paragraph 8.82 states that <i>‘it is likely that the emerging local Plan will provide for sufficient employment land to meet the needs of St Helens Borough. That would be at least for the Plan period to 2035 without a need for the present appeal site to be allocated. The emerging local plan would simply safeguard the appeal land for employment development well beyond 2035 and, it follows beyond at least two reviews of the Plan’.</i> Figure A4.15.</p> <p>The Local Plan Examination in Public is still in progress and the Inspector has not considered the Secretary of State’s conclusions with regard to the appeal. The weight to be attributed to the emerging Local Plan and the proposed draft allocation remains limited.</p>

MSA Operator Interest	There is no known MSA operator currently promoting this site. There is no current MSA scheme for the Site. Peel Investment have promoted Site 9 for employment through the Plan and Planning Application Process.
Test 4	Benefits
Economic Benefits	The delivery of an MSA will provide jobs, it is anticipated that if a scheme was brought forward for this site, the economic benefits on a quantitative level would be broadly comparable, with an MSA the Appeal Site.
Other Benefits	There is no MSA scheme to assess any wider benefits of an MSA at this location.
Conclusion	
<p>Since the site lies within the Green Belt, then the development of an MSA would be considered to be <i>'inappropriate'</i> development and as such, <i>'very special circumstances'</i> would need to be provided to show that the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Development of an MSA in this location could have an adverse impact upon the openness of the Green Belt in this location as well as adverse impact upon the purposes of Green Belt (including settlement gap, and safeguarding countryside from encroachment).</p> <p>The Council considered that the site makes a high contribution to the Green Belt purposes and hence it would not normally be considered any further within the Plan making process. The Council within the suggested Main Modifications also note the harm to landscape that would result from the development of the Site. The Secretary of State and Inspector in response to appeal APP/H4315/W/20/3256871, also determined that there would be major adverse harm to Green Belt and to the landscape.</p> <p>The Site is not located within the 'Optimal Search Area', and therefore is not capable of addressing all of the identified gaps. A gap of in excess of 28 miles would remain on the network between Site 9 and the M67 terminus.</p> <p>The site whilst being proposed for safeguarding within the emerging Local Plan, still remains within the Green Belt. The emerging Local Plan is still subject to Examination and the proposed allocations can only be given limited weight. The proposed safeguarding has been justified on the basis of the need for Employment</p>	

beyond the Plan period. The exceptional circumstances to release the site from the Green Belt do not relate to the need for an MSA.

It has been highlighted both within the Council’s emerging Local Plan evidence, and in the appeal decision that there are capacity and congestion issues that affect the highway network at this location especially at Junction 23. Significant works are noted to be required. **There is no MSA Scheme or highways evidence to determine the impact of an MSA scheme on the operation of the highway network and on Junction 23.**

Site 10: Highway Depot, Rob Lane, South of J23, M6

Tests	Comment
Site Location	
Test 1	Harm to the Green Belt and Other Harms
Green Belt Harm	<p>The St Helens Green Belt Assessment 2018 identifies this site as GB_036 Figure A5.2. The Stage 1B Assessment identifies Parcel 036 as having a High impact on the Green Belt purposes, if developed leading to a significant reduction in the gap between Golborne and Newton le Willows and between the south eastern part of Haydock and Golborne.</p> <p>The parcel was only carried forward to Stage 2 due to the scale of employment need, refer to Figure A5.4. The Stage 2 assessment considered that the Site has Limited developability. Figure A5.7.</p>

	<p>The Stage 3 assessment restated that the site makes a high contribution to the purpose of the Green Belt. It considered that the parcel is not suitable for allocation or safeguarding due to the substantial impact on highway capacity issues at Junction 23. Figure A5.6.</p>
Other Harms	<p>Flood Risk: The site lies within Flood Zone 1. Refer to Figure A5.12. Pockets of the site are liable to surface water flooding. Refer to Figure A5.13.</p> <p>Ecological and Biological: Highfield Moss SSSI and Site of Biological Importance is located 2.2 km to south east of the site. Fox Covert LWS and Cow Hey Dam Local Wildlife Site is located 500m to the north of the site. Ellams Brook is located 100m north east of the site boundary. Group Protected TPOs and Woodland. Figure A5.8, A5.10, and A5.14.</p> <p>Agricultural Land Classification: The site is identified as being Grade 3. Refer to Figure A5.17.</p> <p>Heritage Assets: Grade II Listed Dean School Cottage is located 230 m to the north east of the site. There is potential for some impact upon the setting of this asset, subject to the extent of the proposals. There are a number of listed buildings, within Newton le Willows the closest located off the A49, circa 650 m south of the Site. Figure A5.11.</p>
Highways Safety and Impact on the Road Network	<p>The site is located in close proximity to Junction 23, which would result in the weaving/spacing being below standards set out in CD122 of DMRB. The distance between Junction 23 of the M6 and the site is less than 400m and as such Mr Jones does not consider that this would provide a safe or appropriate MSA location.</p> <p>The Stage 3 assessment considered that the site is not suitable for allocation or safeguarding due to the substantial impact on highway capacity issues at Junction 23. The Stage 3 conclusions note that a study has been commissioned by the Council to identify the nature and potential land take of any improvements that are required to Junction 23. Figure A5.6 and A5.7</p> <p>The site is in operational use by National Highways and is not being promoted for re-development by them. Rather National Highways support the use of the Appeal Site as an MSA.</p>

Test 2	Meeting the Identified Need
Meeting the Identified Need.	<p>The site is not located within the ‘Optimal Search Area’ as defined in the Need and Alternative Sites Assessment (CD I.1.21), and with Mr Jones’s Proof.</p> <p>The site is therefore not capable of meeting all four gaps identified in Mr Jones’s Proof, and as identified within the Highways Agency: Spatial Planning Framework Review of Strategic Road Network Service Areas, 2010 (CD 3.1.3(n)). A gap of in excess of 28 miles would remain in the network between Site 10 and the M67 terminus.</p>
Test 3	Deliverability
Highways, Engineering, Safety and Operational Issues	<p>It has been highlighted both within the Council’s emerging Local Plan evidence, Stage 3 and Stage 2 Green Belt Assessment (A5.6 and A5.8) that there are capacity and congestion issues that affect the highway network at this location, and specifically at junction 23. Significant works are noted to be required.</p> <p>The site is in operational use by National Highways and hence there is no proposed MSA scheme or highways evidence to determine the impact of an MSA scheme on the operation of the highway network and at Junction 23. The site is located in close proximity to Junction 23, which would result in the weaving/spacing being below standards set out in CD122 of DMRB.</p>
Flood Risk	The site is within Flood Zone 1.
Other Constraints	Site 10 is currently in use by National Highways. It is not being promoted for any alternative use. It is therefore not available for MSA use.
MSA Operator Interest	There is no known operator interest.
Test 4	Benefits
Economic Benefits	The delivery of an MSA will provide jobs, it is anticipated that if a scheme was brought forward for this site, the economic benefits on a quantitative level would be broadly comparable, with an MSA at the Appeal Site.

Other Benefits	There is no MSA scheme to assess any wider benefits of an MSA at this location.
----------------	---

Conclusion


Since the site lies within the Green Belt, then the development of an MSA would be considered to be *'inappropriate'* development and as such, *'very special circumstances'* would need to be provided to show that the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Development of an MSA in this location could have an adverse impact upon the openness of the Green Belt in this location as well as adverse impact upon the purposes of Green Belt including purposes 2 and 3. The site is proposed to be retained in the Green Belt within the emerging Local Plan, which considers it makes a **High** contribution to the Green Belt purposes.

The site is not located within the *'Optimal Search Area'*, and therefore is not capable of addressing all of the identified gaps, A gap of in excess of 28 miles would remain on the network between Site 10 and the M67 terminus.

Significantly, the site is occupied by National Highways, and hence is not available for the use as an MSA. There are also highway capacity issues on the network at this location, there are currently no committed schemes or detailed designs to address these issues. The site is located in close proximity to Junction 23, which would result in the weaving/spacing being below standards set out in CD122 of DMRB.

Site 11: J7/8 of the M56 Motorway at Tatton

Tests	Comment
Site Location	
Test 1	Harm to the Green Belt and Other Harms
Green Belt Harm	<p>The site is located within the designated Green Belt. A Green Belt Assessment Update was undertaken by Cheshire East in 2015. This identifies the site as being located within as General Area N7. The site's boundaries broadly align with the General Area boundaries. Refer to Figure A6.2.</p> <p>Appendix A of the Green Belt Assessment concludes that the site makes a contribution to the purposes of the Green Belt, noting a significant contribution towards purpose 3 and protecting a significant degree of openness. Refer to Figure A6.3.</p>
Other Harms	<p>Flood Risk: The site is within Flood Zone 1, Figure A6.13. There are pockets of the site that are liable to surface water flooding, Figure A6.14. The site is not at risk of flooding from reservoirs, however land adjacent to the M56 junction is susceptible to such flooding. Figure A6.15.</p> <p>Landscape: The Site is identified as being within an Area of Special County Value (known as Local Landscape Designations (LLD)). It is identified as lying within Bollin Valley LLD. The extent of this designation has recently been considered at the Examination in Public of the Cheshire East</p>

Site Allocation and Development Policies Plan. The Inspector, in the post hearing note 26/2/2022, has determined that the farm and landscape north of the M56 should be retained within the LLD boundary *"the farm and its surrounding landholding continue to form part of the wider landscape of the Bollin Valley to the north of the M56. Its fields, woodland and isolated farm buildings contribute to the special landscape qualities of the LLD, as defined in the LLD Review, including the semi-natural, pastoral character and dispersed settlement pattern that typify the upper levels of the valley landscape. Whilst the tranquillity of the land around Yarwood Heath Farm is broken by the noise of traffic on the M56, the motorway and its wooded embankments serve to enclose the wider valley landscape to the south of the Bollin River at this point in its course. Whilst I agree with the decision to remove the slip road infrastructure from the LLD, I am satisfied that the landscape character and qualities of Yarwood Heath Farm justify its retention within the LLD. Retaining the farm and the landscape north of the M56 within the LLD boundary will also help to ensure that any development proposals within this area are properly considered in terms of their effect on the special qualities of the Bollin Valley landscape"* Refer to Figure A6.6.

As such development of this parcel of land would need to assess the potential for harm to the intrinsic landscape character and qualities within the Local Landscape designation.

Ecological and Biological: Yarwood Heath Covert LWS is located within the site. The site is within 350m of Rostherne Mere National Nature Reserve RAMSAR and SSSI. The site is within 400m of Watch Hill Site of Biological Importance and circa 450m from Hanging Bank Covert Site of Biological Importance. Dunham Massey Registered Park and Garden, and Rookery Wood Site of Biological Importance are circa 540 m to the north of the site. Dunham Massey SSSI and Dunham Park Site of Biological Importance are circa 1.1 km from the site. Refer to Figure A6.16 and A6.17. Natural England responded to an ES Scoping request for development of the site (reference 20/4877S) noting that the proposed development is within an area that is important as part of a landscape scale network of wetland habitats that act as stepping stones for wildlife. Refer to Figure A6.8.

Agricultural Land Classification: The site is identified as being Grade 2 and 4. Refer to Figure A6.21.

Heritage Assets: The site is within 350 m of Mere Covert Cottage (Grade II Listed Building). The site is within 800 m of the Grade II Listed outbuilding approximately 100m east of Ryecroft Farmhouse, 800m from the Grade II listed

	<p>Bowgreen Farmhouse. Scheduled Monument of Watch Hill Motte and Bailey. Refer to Figure A6.7. The response to the ES Scoping request (20/4877S) from Cheshire Archaeology notes that the farm buildings associated with Yarwood Heath Farm are on the 1847 Tithe map. There is the potential for significant archaeological deposits on site including features of medieval water management, Iron working, and Roman artefacts. Refer to Figure A6.9.</p>
Highways Safety and Impact on the Road Network	<p>Safe access could be taken from the southern arm of the Bowden Roundabout which currently provides access to farm buildings. The access (Figure A6.11) identifies a potential new off-slip (diverge) from M56 eastbound connecting to an internal roundabout. There is already an off-slip immediately east of the Yarwood Heath Lane bridge over M56, which then links the M56 to the Bowden Roundabout. Providing a new off-slip as indicated on the Illustrative Masterplan would result in consecutive off-slips within c.500m of each other. Given the proximity, the fact the existing layout is reasonably complex and that there is already a connection from M56 eastbound to Bowden Roundabout this suggested additional off-slip may be resisted by National Highways.</p> <p>Highways England responded to the ES Scoping request (20/4877S) and noted that they have concerns around the suitability of the access and egress arrangements for the facility, in particular in relation to highway safety as well as the impact to journey times through the area, particularly given the proximity to the existing slip configuration at M56 J7. Refer to Figure A6.10.</p>
Test 2	Meeting the Identified Need
Meeting the Identified Need.	<p>The site is not located within the ‘Optimal Search Area’ as defined in the Need and Alternative Sites Assessment (CD 1.1.21), and within Mr Jones’s Proof.</p> <p>The site is therefore not capable of meeting all four gaps identified in Mr Jones’s Proof, and as identified within the Highways Agency: Spatial Planning Framework Review of Strategic Road Network Service Areas, 2010 (CD 3.1.3(n)).</p>
Test 3	Deliverability
Highways, Engineering, Safety and Operational Issues	<p>Access is directly available from Bowden roundabout. M56 traffic would have to divert to Bowden Roundabout. The section of M56 between J6 – J8, which carries in excess of 100,000 vehicles per day, is congested under typical conditions. It is currently subject to Smart Motorway improvement works, which began in November 2020. The scheme involves converting the hard shoulder to create an</p>

	<p>additional permanent (fourth) traffic lane between M56 J6 – J8. The hard shoulder in both directions near J7 has already been converted to additional running lanes.</p> <p>Highways England responded to the ES Scoping request (20/4877S) and noted that they have concerns around the suitability of the access and egress arrangements for the facility, in particular in relation to highway safety as well as the impact to journey times through the area, particularly given the proximity to the existing slip configuration at M56 J7. Refer to Figure A6.10.</p>
Flood Risk	The Site is within Flood Zone 1.
Other Constraints	<p>HS2 – Figure A6.20 provides the latest HS2 Safeguarding Direction, this details an area of Safeguarding within the site, along the access road. The ES Scoping 20/4877S did not consider HS2 as a committed scheme (Figure A6.20a) but since then the High Speed Rail Bill has been laid in Parliament on 24th January 2022. The accompanying ES illustrates the intention for Yarwood Heath Lane to be used as an HS2 construction route to serve the HS2 compound (Rostherne Cutting Satellite Compound). Construction is programmed to start in Q2 2027 (Construction Routes - the Strategic Road Network Map No TR-08-307).</p> <p>There is no evidence in the public domain to demonstrate how the potential implications arising from the construction and operation of HS2, have been fully considered and addressed to the satisfaction of HS2.</p> <p>The site is within close proximity to a historic landfill site, Figure 6.18.</p>
MSA Operator Interest	<p>The site is currently being promoted by Tatton Estates for an MSA. An ES Scoping request has been submitted (20/4877S) but no Planning Application has yet been submitted. Westmorland are identified as the potential operator.</p> <p>Neither Tatton Estate not Westmorland have objected to the Appeal application.</p>
Test 4	Benefits
Economic Benefits	The delivery of an MSA will provide jobs, it is anticipated that if a scheme was brought forward for this site, the economic benefits on a quantitative level would be broadly comparable, with an MSA on the Appeal Site. The pre- application consultation material indicates that the MSA proposes to include a 100 bed hotel, and deliver 325 jobs.

Other Benefits	There is no Planning Application to facilitate an assessment of any wider benefits of an MSA at this location, beyond the pre application consultation materials and ES Scoping (20/4877S).
----------------	---

Conclusion

Since the site lies within the Green Belt, then the development of an MSA would be considered to be *'inappropriate'* development and as such, *'very special circumstances'* would need to be provided to show that the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Development of an MSA in this location could have an adverse impact upon the openness of the Green Belt in this location as well as adverse impact upon the purposes of Green Belt (with particular regard to safeguarding countryside from encroachment). The site is proposed to be retained in the Green Belt within the emerging Site Allocation and Development Policies Local Plan which considers that the site makes a significant contribution to the Green Belt purposes.

The Site is located within a Local Landscape Designation. The Inspector for the Cheshire East SADPD, has recently confirmed that the site's inclusion within the Local Landscape Designation remains justified and sound, noting its contribution to the special landscape qualities. The development of an MSA at this location has the potential to harm these qualities.

The Site is located in close proximity to a RAMSAR, SSSIs, Registered Park and Garden, and contains a local wildlife site.

The Site is currently being promoted for an MSA, however an application is yet to be submitted. An MSA in this location, would not be within the 'Optimal Search Area', it would not meet the identified gaps in the network. The promoter of the site has not objected to the Appeal application.

National Highways has raised concerns with the currently proposed access arrangements, which result in two slip roads being located close together, within an already complex junction. These concerns will need to be addressed, at present there is insufficient evidence to demonstrate that the concerns can be overcome.

The Site is therefore not located within the *'Optimal Search Area'*, it is also located within the Green Belt, and is not sequentially preferable in this regard, furthermore it is noted contribute to the special landscape qualities of the area. There are some significant constraints which affect the site.

4. Summary and Conclusions

- 4.1. This Comparative Assessment Update has been prepared in response to objections to the Appeal. Such objections have not come from the Council who are supportive of the conclusions of the original ASA.
- 4.2. Objections have been made by Peel with specific reference to Sites 6 and 7 of the Need and Alternative Site Assessment. In addition, objectors have identified four potential additional alternative sites, not considered within the ASA at Junction 21 of the M6; Junction 23 of the M6; National Highways, Rob Lane, South of J23, M6; and the Proposed Tatton Services site at J6/7 on the M56.
- 4.3. The Comparative Assessment Update was undertaken having regard to the potential harm that would be caused to the Green Belt, and any other harm; whether an MSA at that location could meet the identified need just as well or better than the Appeal Scheme; whether the other benefits are comparable or greater; and whether the sites are likely to be deliverable within a reasonable timeframe.
- 4.4. All of the sites are located within the Green Belt within currently adopted Development Plans and hence none are sequentially preferable to the Appeal Site in this regard. Each site has been the subject of an evaluation of its Green Belt role as part of the respective Local Plan Green Belt assessments. The comparative Green Belt conclusions from these documents are:-

Site	Overall Green Belt conclusion from the Local Plan Assessments
Appeal proposal (Junction 11 of M62)	Weak
Site 6	Moderate
Site 7	Moderate - strong

Site	Overall Green Belt conclusion from the Local Plan Assessments
Site 8 - J21 of the M6 Motorway (Peel)	Moderate
Site 9 - J23 of the M6 Motorway (Haydock)	High
Site 10 - National Highways Depot off M6, Rob Lane	High
Site 11 - J7/8 of the M56 Motorway (Tatton Services)	Weak-Moderate

4.5. It is clear from the above that the Appeal Site has least impact upon the Green Belt when compared to the objector sites. All six objector sites are assessed as making a contribution to the purposes of the Green Belt. All sites have been assessed recently in order to support Green Belt reviews as part of Local Plan reviews and in the case of Site 8 and 9 have been subject to appeal decisions which have considered the sites in the context of Green Belt purposes and openness. In relation to Site 8 (ref APP/M0655/V/00/000199&200) the Inspector concluded that the proposal would seriously damage the openness of the Green Belt and its visual amenity. The appeal decision in relation to Site 9 was issued after the St Helens Local Plan EIP hearing sessions. The Inspector who considered the appeal determined that the emerging St Helens Plan and Site allocations carried little weight. The appeal was dismissed due to the ‘*very significant*’ harm to the Green Belt openness and Green Belt purposes, with the decision citing a significant measure of harm to the purpose of the Green Belt to prevent urban sprawl, stating that there would be ‘*blatant*’ encroachment into the countryside. All of the sites have been assessed as making a greater contribution to the purposes of the Green Belt than the Appeal Site.

- 4.6. Site 6 and Site 9 are proposed within emerging Local Plans to be released from the Green Belt. Site 6 is proposed to be released from the Green Belt to meet specific employment needs and not to meet the need for an MSA. The relevant emerging Development Plan '*Places for Everyone*', was submitted for examination on 14th February 2022, but the site is subject to objection and therefore limited weight can be ascribed to the emerging policy at this time. Similarly site 9 is proposed to be safeguarded within the emerging St Helens Local Plan but the '*exceptional circumstances*' do not relate to the need for MSA as the site has been promoted through the Plan on the basis of '*exceptional circumstances*' to meet the need for employment. Whilst the draft St Helens Local Plan is at an advanced stage in the Examination, consultation on Main Modifications has only recently ended. The Secretary of State has refused planning permission for employment development on this site since the last Examination in Public hearings and hence the Secretary of State's conclusions will need to be considered by the Examination in Public Inspector. The Inspector is still to confirm the next steps following Main Modifications, and whether hearings will be opened again, or whether the Inspector will issue a report.
- 4.7. With respect to other harms, Sites 6 and 7 will result in the loss or partial loss of Boysnope Park Golf Club an identified Green Space. The delivery of an MSA on Site 6 could also impact on the ability of '*Places for Everyone*' to achieve its strategic objectives in relation to employment land. No evidence has been provided by Peel to demonstrate how an MSA could be delivered on Site 6 whilst retaining the quantum of employment land identified in emerging policy JPA 29. Site 8 is subject to significant flood risk and is located immediately adjacent to ecologically important sites. Site 9 was evidenced to be a sensitive landscape at the recent appeal (planning application reference P/2017/0254/OUP), with the Inspector and Secretary of State determining that development of part of the site would have a high adverse impact on landscape character. The SRN and road network at this location is also identified to have capacity issues, which require significant improvements, for which there is no commitment to delivery. There is therefore the potential for development at Site 9 and Site 10 to have an adverse impact on the operation of the highway network and on Junction 23. Site 11 could also harm the landscape qualities that are important to

the landscape designation at this location, as well as the potential for harming a number statutory and non-statutory environmental and heritage sites. The junction arrangement for this site is complex at this location, and there is potential for the development to impact on safety and journey times, as identified by National Highways in their response to the ES scoping.

- 4.8. As a result it is considered that all of the alternative sites have the potential to cause a greater degree of other harms than the Appeal Scheme.
- 4.9. With regards to the ability to meet the need, Sites 6 and 7 are located within the 'Optimal Search Area', alongside the Appeal Site. Therefore they are equally capable of meeting the identified needs. The four additional alternative sites are all located outside the 'Optimal Search Area' and they are therefore not capable of meeting all four gaps as identified.
- 4.10. In terms of benefits, there are no fully worked up MSA schemes at any of the Alternative Sites, although regard has been given to the content of the ES scoping for Site 11. As a result the economic benefits that could arise as a result of the provision of an MSA on the Alternative Sites have been considered to be comparable. Whilst the pre application material for Site 11 provides some information on wider benefits, there is no full ES or Planning Statement to review. Comparatively, the Appeal Scheme benefits are set out in detail in Mr Rolinson's Proof of Evidence and they relate to skills and training, investment, connectivity for local users of the public footpath network, health and recreation benefits, biodiversity net gain, ecological benefits, meeting the need for alternative fuels and public art contribution towards the refurbishment of the Encounter Statue.
- 4.11. In terms of delivery, the Comparative Assessment Update has reconfirmed that sites 6 and 7 are constrained by the current lack of commitment, or detailed design for the delivery of a new junction at the M62. The conclusions within the original Need and Alternative Sites Assessment remain valid, and it is maintained that a Junction and therefore an MSA cannot be delivered at these sites in the immediate or short term.

- 4.12. As with all the alternative sites considered, with the exception of Site 11, there is no known MSA operator, or fully worked up scheme, and accordingly a lack of technical evidence to demonstrate the deliverability of an MSA.
- 4.13. Site 8 also has additional deliverability constraints, relating to the significant flood risk present at the site, and significantly the contamination which will require remediation. sites 9, 10 and 11 are also constrained by highways issues, with sites 9 and 10 constrained by the current congestion issues affecting the road network at this location and the operation of Junction 23. Significant improvements are required at this location, and there is presently no commitment to deliver them. There is no evidence to demonstrate that a standalone MSA at site 9 can be viably delivered in the context of the known need for significant improvements. Significantly, for site 10 there is no evidence that this site is available as the site is currently in operation by National Highways. In addition, the site is located in close proximity to Junction 23, which would result in the weaving/spacing being below standards set out in CD122 of DMRB. As stated, highways issues also impact upon site 11, and National Highways have raised concerns in relation to the impact of the scheme on highway safety and journey time. Furthermore, HS2 safeguarding impacts upon the site access and there is no evidence in the public domain to suggest that the MSA can be delivered having regard to the Safeguarding Direction. The site is also further constrained by a number of statutory and non-statutory designations. In comparison, there is significant technical evidence to demonstrate the deliverability of the Appeal Scheme as set out within Mr Rolinson' and Mr Jones's Proofs. The Appeal Scheme is promoted by Extra MSA Group who have a strong track record on MSA delivery.
- 4.14. This Alternative Site Comparative Assessment Update re-affirms the conclusions of the original ASA **that land within the North East Quadrant of Junction 11 of the M62 Motorway (Site 2- the Appeal Site) is the most sequentially preferable location to meet the identified need having regard to the locational requirements of the new MSA and the potential harm to the Green Belt and other harm. This site lies within the 'Optimal Search Area' of public safety need identified having regard to the policy requirements**

set out in Circular 02/2013 and will fully address the FOUR unmet gaps on the M6 / M62 / M60, M58 and M67 corridors in the North West Region, reducing distances between MSAs to at or below the 28 mile maximum. The Appeal Scheme is capable of delivering significant benefits beyond addressing the identified gaps resulting in improvements to public safety and welfare. The Appeal Site is deliverable in the short term.

Appendices

Appendix I – Site 6, Junction IIA South East Quadrant



Figure A1.1 Location Plan

Planning Criteria

Green Belt Status

07.01.04 Greater Manchester Green Belt Assessment, 2016 LUC.

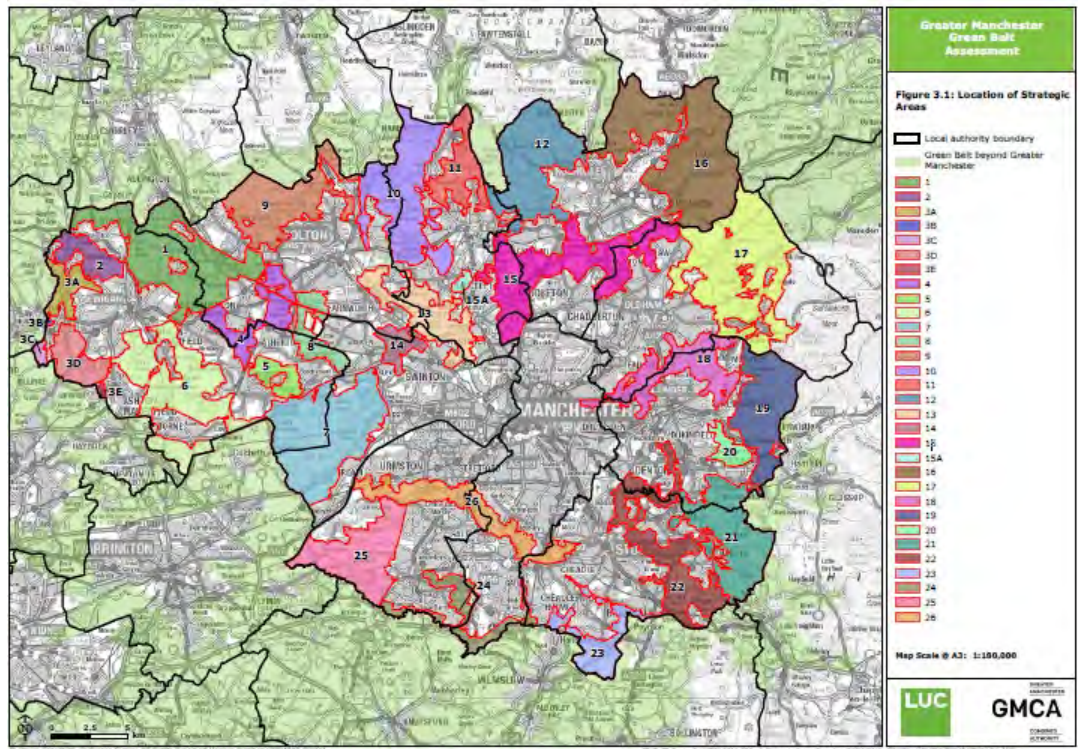


Figure A1.2 Location of Strategic Areas, Extract 07.01.04 Greater Manchester Green Belt Assessment 2016.

Table 4.19: Assessment ratings for Strategic Green Belt Areas in Salford

Strategic Green Belt Area	Strategic Green Belt Area assessment ratings			
	Purpose 1	Purpose 2	Purpose 3	Purpose 4
7	Moderate-Strong	Strong	Moderate-Strong	Weak
8	Moderate-Strong	Strong	Weak-Moderate	Weak-Moderate
13	Strong	Strong	Moderate	Moderate
14	Moderate-Strong	Moderate-Strong	Weak	No contribution

Figure A1.3 Findings for Strategic Areas Extract 07.01.04 Greater Manchester Green Belt Assessment 2016.

Parcel Ref	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Strategic GB Area
SA29	Strong	Weak	Weak	Weak	No Contribution	7
SA30	Strong	Moderate	Weak	Moderate	No Contribution	7
SA32	Strong	Strong	Moderate	Moderate	No Contribution	7
SA33	Strong	Strong	Moderate	Moderate	No Contribution	7
SA34	Moderate	Moderate	Moderate	Weak	No Contribution	7
WG101	Strong	Strong	Moderate	Moderate	No Contribution	7

Figure A1.4 Findings for Parcels Extract 07.01.04 Greater Manchester Green Belt Assessment 2016

Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04)

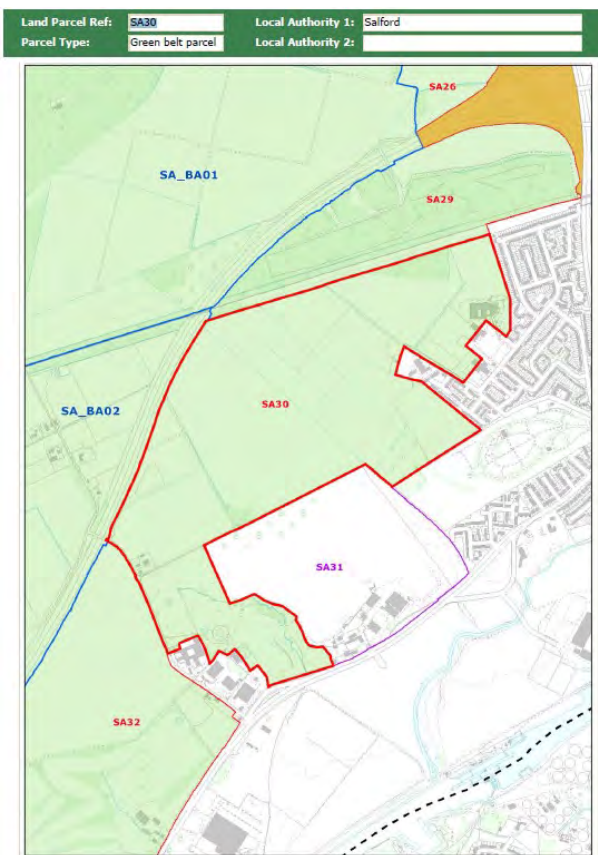


Figure AI. 5 Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04).

Land Parcel Ref:	SA30	Local Authority 1:	Salford
Parcel Type:	Green belt parcel	Local Authority 2:	

Parcel Description

This parcel is located western settlement edge of Peel Green (part of Eccles), within the Salford Borough area. The parcel contains flat land comprising predominantly large arable fields enclosed by remnant hedgerows. Built development includes The Salford City Academy school and associated playing fields in the north, a detached property and features associated with the City Airport and Heliport. There are no large roads running through the parcel, though the M62 motorway defines the northern boundary.

Purpose 1 - Check the unrestricted sprawl of large built up areas

1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?

Rating:

Notes:

The parcel lies adjacent to Peel Green, Eccles. There are limited urbanising features within the parcel; development includes Salford City Academy and sports fields to the north-east, and residence to the south-west. There is a strong sense of openness within the parcel because of the farmed landscape. The parcel plays some role in checking the unrestricted sprawl of Peel Green, Eccles. Planned development includes a railway line that will run through the parcel as part of Port Salford scheme to the south of Liverpool Road. Also of relevance is the development in planning to the south of the A57 between Eccles and Irlam, this includes an inter-modal freight facility (Port Salford) and retail development associated with the existing AJ Bell Stadium.

1b - Does the parcel protect open land from the potential for urban sprawl to occur?

Rating:

Notes:

The parcel lies adjacent to Peel Green, Eccles. There are some barrier features at the outer edge of the parcel that could prevent urban sprawl from taking place within the parcel such as the M62 on the western border, railway line on the northern border and the City Airport and Heliport to the south. However there still is the potential for urban sprawl to occur from the urban edge of Peel Green, Barton Moss Lane and the Salford City Academy. The parcel plays some role in inhibiting ribbon development east of Barton Moss Road and north of Buckthorn Lane. Planned development includes a railway line that will run through the parcel as part of Port Salford scheme to the south of Liverpool Road. Also of relevance is the development in planning to the south of the A57 between Eccles and Irlam, this includes an inter-modal freight facility (Port Salford) and retail development associated with the existing AJ Bell Stadium.

Purpose 2 - To prevent neighbouring towns merging into one another

2a - Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?

Rating:

Notes:

The parcel forms part of a gap between the settlements of Boothstown and Eccles and between Eccles and Irlam. Loss of openness within the parcel would lead to a narrowing of the gap between the settlements but the settlements would still be perceived as being separate.

Figure AI. 6 a Findings for Parcel SA30 Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04).

Land Parcel Ref:	SA30	Local Authority 1:	Salford
Parcel Type:	Green belt parcel	Local Authority 2:	

Purpose 3 - To assist in safeguarding the countryside from encroachment

3a - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?
Has the parcel already been affected by encroachment of urbanised built development?

Rating:

Notes:

There is a limited sense of urban encroachment within the parcel as a result of Salford City Academy High School and sports fields, and part of the City airport and Heliport. However, despite this urbanising influence the parcel still displays some of the characteristics of the countryside, but lacks a strong rural character. Neighbouring urban development, including airport activities, has a visual influence on the rural character of the parcel in parts.

Purpose 4 - To preserve the setting and special character of historic towns

4a - Does the parcel contribute to the setting and 'special character' of a historic town(s)?

Rating:

Notes:

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlements of Astley, Barton upon-Irwell, Ellesmere Park (Eccles), Irlams o'th' Height, Monton Green (Eccles) and Worsley. In practice, the parcel has a very limited or no relationship (visual or physical) with any of the historic settlements and does not play role in their setting or significance. This is largely due to visual screening provided by buildings, roads, and trees etc.; and the parcel's flat and low-lying topography.

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is difficult to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore this study will not undertake a parcel by parcel assessment of the contribution made in relation to Purpose 5.

Figure A1. 6 b Findings for Parcel SA30 Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04).

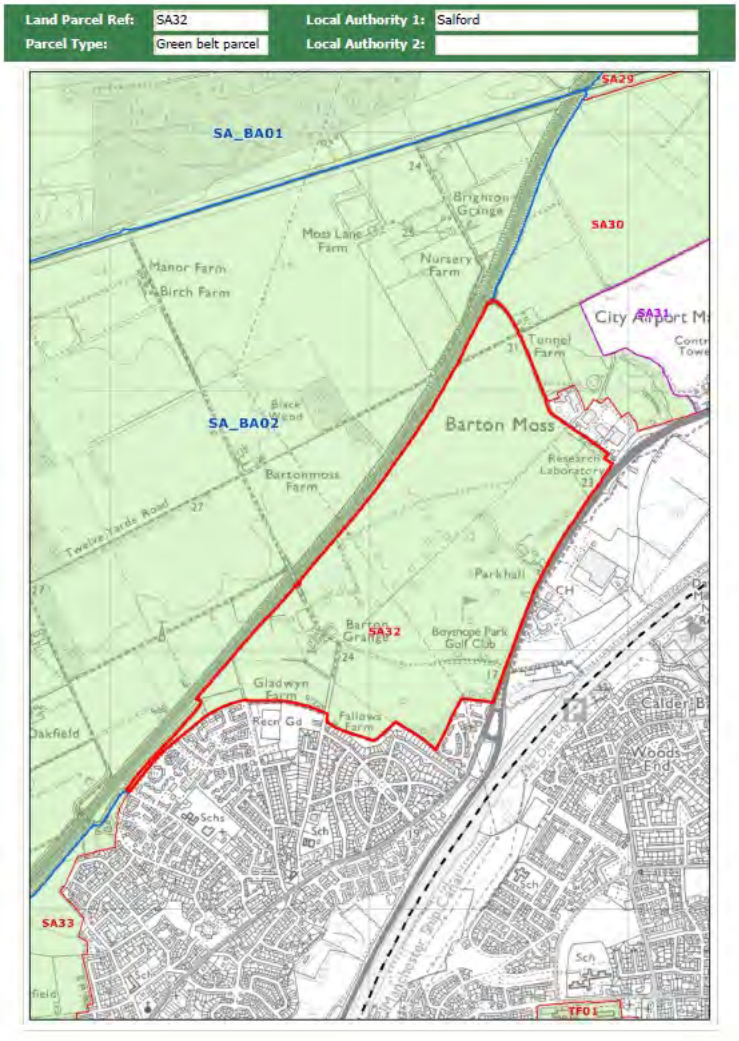


Figure A1. 7 Parcel SA32 Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04).

Land Parcel Ref:	SA32	Local Authority 1:	Salford
Parcel Type:	Green belt parcel	Local Authority 2:	

Parcel Description

This parcel is located on the northern urban edge of Irlam, within the Salford Borough area. The parcel contains flat land comprising predominantly of the Boysnope Park Golf Course. Other land cover includes a number of large arable and smaller pastoral fields. Built development is limited to farmsteads and the golf course clubhouse. There are no large public roads running through the parcel, though the M62 defines the northern and western boundary.

Purpose 1 - Check the unrestricted sprawl of large built up areas

1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?

Rating:

Notes:

The parcel lies adjacent to Irlam. There are few urbanising features within the parcel. Built development within the parcel includes the Boysnope Park Golf clubhouse, assess and parking, and small scale commercial development to the south. There is a strong sense of openness within the parcel due to a land cover of farmland, woodland shelter belt and managed golf course. The parcel plays a strong role in checking the unrestricted sprawl of Irlam.

1b - Does the parcel protect open land from the potential for urban sprawl to occur?

Rating:

Notes:

The parcel lies adjacent to Irlam. The urban boundary of Irlam is comprised of residential gardens. The M62 to the northwest is a strong barrier feature preventing the sprawl of urban development within the parcel. The parcel plays a strong role in inhibiting ribbon development south of Barton Moss Road and west of the A57 and along the internal access road Fiddlers Lane to the south-west.

Purpose 2 - To prevent neighbouring towns merging into one another

2a - Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?

Rating:

Notes:

The parcel forms part of a gap between the settlements of Irlam and Eccles. The parcel creates a sense of separation between Irlam and Eccles when travelling along the A57. There is a significant amount of development taking place south of the A57 including an inter-modal freight facility and retail associated with the existing AJ Bell Stadium. This will increase the importance of this parcel in preventing the further merging of settlements.

Figure AI. 8 a Findings for Parcel SA32 Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04).

Land Parcel Ref:	SA32	Local Authority 1:	Salford
Parcel Type:	Green belt parcel	Local Authority 2:	

Purpose 3 - To assist in safeguarding the countryside from encroachment

3a - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?
Has the parcel already been affected by encroachment of urbanised built development?

Rating: Moderate

Notes:

There is a limited sense of urban encroachment within the parcel as a result of Boysnope Park Golf Club and small scale commercial development. However, the parcel still displays some of the characteristics of the countryside despite these urbanising influences. Neighbouring urban development has a limited visual influence on the rural character of the parcel.

Purpose 4 - To preserve the setting and special character of historic towns

4a - Does the parcel contribute to the setting and 'special character' of a historic town(s)?

Rating: No Contribution

Notes:

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlements of Astley, Barton upon-Irwell, Ellesmere Park (Eccles), Monton Green (Eccles) and Worsley. In practice, the parcel has a very limited or no relationship (visual or physical) with any of the historic settlements and does not play role in their setting or significance. This is largely due to visual screening provided by buildings, roads, and trees etc.; the parcel's flat and low-lying topography; and the relatively large distance between the parcel and nearest historic settlement (Barton upon-Irwell 2.6km away).

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is difficult to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore this study will not undertake a parcel by parcel assessment of the contribution made in relation to Purpose 5.

Figure A1. 8 b Findings for Parcel SA32 Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04).

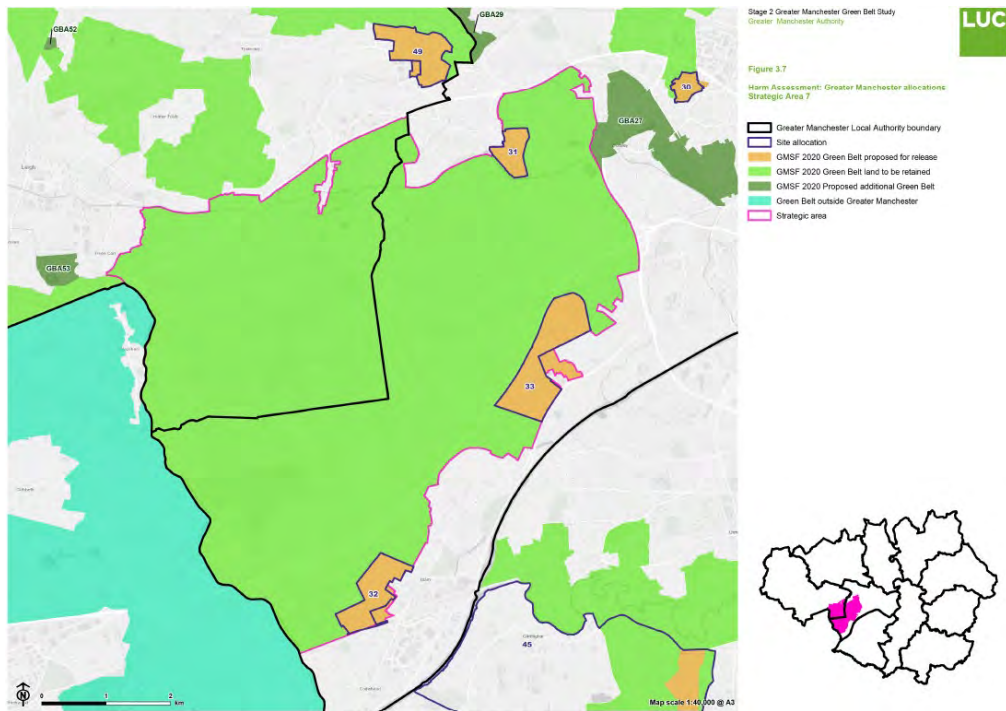


Figure A1.9 Extract 07.01.07 Stage 2 Green Belt Study, Cumulative Assessment of Proposed 2020 GMSF allocations.

*note that Port Salford reference is GM33 at this point

Purpose 1: To check the unrestricted sprawl of large built-up areas

3.47 This low-lying area has seen historic patterns of urban sprawl, evident at Irlam where the gradual development, field by field, is evident. Release of the allocations would in itself constitute urban sprawl, and the release of GM33 to the south of the M62 would lead to greater containment of the remaining Green Belt to the south and north east. The remainder of SGBA7

would continue to play a role checking the unrestricted sprawl of Leigh, Astley, Irlam and Eccles. The sizeable Green Belt addition of the West Salford Greenway would add to the SGBA's contribution in checking sprawl, specifically from Worsley, Swinton and Monton, however its containment by the surrounding urban edge limits the extent to which the land plays a role in preventing sprawl.

Purpose 2: To prevent neighbouring towns merging into one another.

3.48 This area of Green Belt contributes to maintaining the separation of settlements around its fringes including Irlam, Leigh, and Astley. It also helps maintain separation from settlements beyond the GM boundary, including north east Warrington, Culcheth and the village of Glazebury. Release of allocation GM31 would narrow the gap between Boothstown and Ellenbrook, and Worsley, although significant separating features mean the Green Belt here would continue to contribute to preventing the settlements from merging. Allocation GM32 does not lie in a narrow gap between towns, whereas allocation GM33 lies between Urmston and Eccles, as well as between Irlam and Eccles, which are already linked to a significant degree. Release of the allocations would not affect any other settlement gaps in SGBA 7. The Green Belt addition provides a degree of separation between Worsley and Monton and Eccles to the south, but this is limited and the settlements have already partially merged.

Purpose 3: To assist in safeguarding the countryside from encroachment.

3.49 The rural character of SGBA7 is reasonably intact, with a mix of agriculture and woodland occupying the former mosslands. The north of the area has been affected by mineral working, while the periphery is affected by transport infrastructure. Release of the allocations would encroach on the countryside and GM33 would lead to a degree of containment. The majority of the remaining area of the SGBA would however continue to safeguard the countryside from encroachment. The Green Belt addition is generally open but contains some urbanising development and is surrounded by the urban edge, limiting the extent to which the area is perceived as countryside.

LUC I 29

Purpose 4: To preserve the setting and special character of historic towns.

3.50 Large parts of this SGBA make no contribution to this purpose, Release of allocation GM31 could detract from the setting and special character of Worsley to a relatively limited extent, although the West Salford Greenway GBA27 plays an important role in the setting of the Worsley and its designation could help to preserve this. Release of the other allocations would not have an effect on preserving the setting and special character of any other historic towns in the SGBA.

Figure A1.10 Extract 07.01.07 Stage 2 Green Belt Study, Cumulative Assessment of Proposed 2020 GMSF allocations.

*note that Port Salford reference is GM33 at this point

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
Salford						
GM30	Salford	Land at Hazelhurst Farm	15.7	GM30	15.7	Low-Moderate
GM31	Salford	East of Boothstown	29.0	GM31-1	11.6	Low-Moderate
GM31	Salford	East of Boothstown	29.0	GM31-2	17.4	Moderate
GM32	Salford	North of Irlam Station	65.1	GM32	64.3	Moderate
GM33	Salford	Port Salford Extension	109.1	GM33-1	57.1	Moderate
GM33	Salford	Port Salford Extension	109.1	GM33-2	52.0	Moderate

Figure A1.11 Extract of 07.01.08 Stage 2 Proposed 2019 GMSF Allocations (Site 6 includes GM33-1 and GM33-2 in this document)

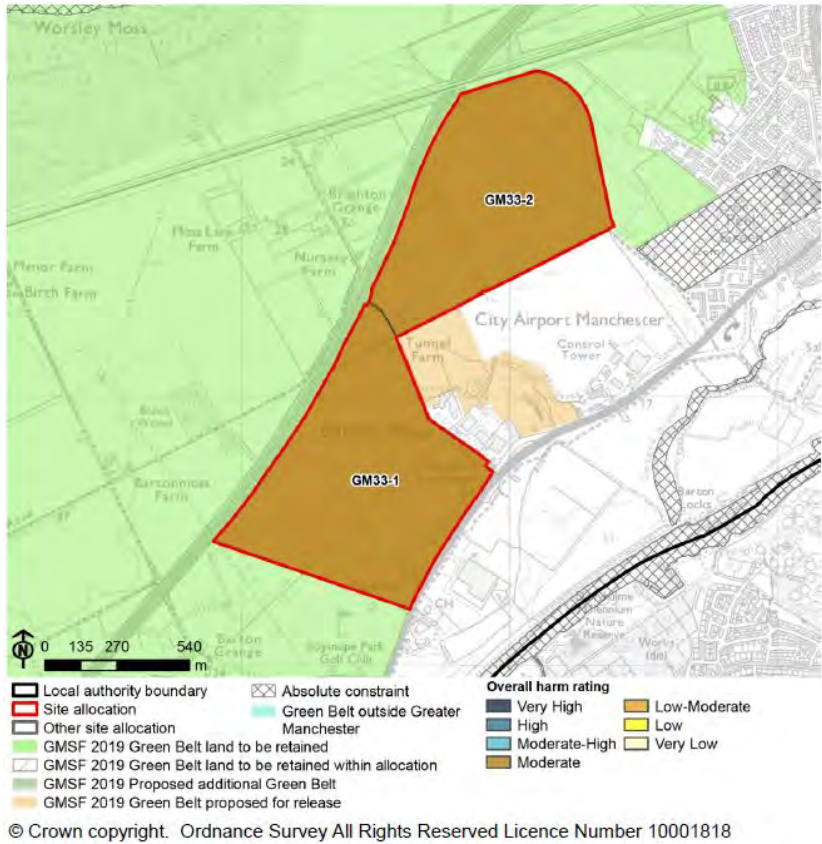


Figure AI.12 Extract of 07.01.09 Stage 2 Proposed 2019 GMSF Allocations (Site 6 includes GM33-1 and GM33-2 in this document)

GM33-1

Area Description

Flat area of farmland and part of the former Boysnope Park Golf Club, lying between the inset edge of Urmston and the M62 motorway. The sub-area is open land and contains no urbanising development to diminish openness, however the presence of the residential area within Irlam to the southwest, the inset settlement edge to the east and the inset research facility to the northeast create a limited degree of urbanising containment within the Allocation. The A57 creates some distinction from the adjacent urban edge, however this has already been breached by inset development. The outer boundary with adjacent retained Green Belt land is marked by the M62 to the west, while to the south the boundary is marked by no recognisable boundary features.

Impact on purposes

- Purpose 1 - Check the unrestricted sprawl of large built-up areas
Rating: Relatively Significant
The settlement of Urmston & Davyhylme is part of the large built-up area of Greater Manchester, so development expanding this area would constitute sprawl. The sub-area is open and has some distinction from the urban edge, contributing to its role in preventing sprawl.
- Purpose 2 - Prevent neighbouring towns merging into one another
Rating: Relatively Limited
The sub-area does lie between the towns of Urmston & Davyhylme and Eccles, as well as between Irlam and Eccles. However, all three towns are already linked to a significant degree, limiting this land's role in preserving the gap.
- Purpose 3 - Assist in safeguarding the countryside from encroachment
Rating: Relatively Significant
The release would encroach on land which, despite a degree of containment, retains openness and is generally perceived as countryside.
- Purpose 4 - Preserve the setting and special character of historic towns
Rating: Limited/No
Land does not make a significant contribution to the setting of any historic town.

GM33-1

- Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land
Rating: Equal contribution
All Green Belt land is considered to make an equal contribution to this purpose.

Figure A1.13a Extract of 07.01.09 Stage 2 Proposed 2019 GMSF Allocations (Site 6 includes GM33-1 and GM33-2 in this document).

Impact on adjacent Green Belt

Rating: No/Negligible

The release of the sub-area, as part of the release of the Allocation as a whole, would increase to an extent the containment of retained Green Belt land at the former golf course to the south, which would as a result be bound to the northeast, southwest and southeast by urbanising uses. However, this land does not make a greater contribution to the Green Belt purposes and as such its containment would not increase harm. In addition, it would also result in a distinct revised Green Belt boundary to the west, which would be defined by the M62 motorway.

Overall harm to Green Belt purposes from release of land

Moderate

Release of the sub-area, as part of the release of the Allocation as a whole, would constitute relatively significant sprawl and encroachment onto the countryside and a relatively limited impact on preventing the merger of towns. It would constitute a negligible weakening of retained Green Belt land. Harm from the release of the sub-area is therefore assessed as moderate.

Figure A1.13b Extract of 07.01.09 Stage 2 Proposed 2019 GMSF Allocations (Site 6 includes GM33-1 and GM33-2 in this document)

GM33-2

Area Description

Flat area of farmland to the north of Barton Aerodrome, with scattered trees and agricultural buildings. The sub-area contains no urbanising development to diminish openness and is not contained by any surrounding urbanising development. The boundary with the airfield on the inset edge creates no significant distinction from the adjacent inset area. The outer boundary with adjacent retained Green Belt land is distinctly defined by the M62 to the west, a railway line to the north, and the emerging Port Salford rail link to the northeast.

Impact on purposes

- Purpose 1 - Check the unrestricted sprawl of large built-up areas

Rating: Relatively Significant

The settlement of Urmston & Davyhylme is part of the large built-up area of Greater Manchester, so development expanding this area would constitute sprawl. The sub-area is open, however the lack of distinction from the inset edge limits to an extent its role in preventing sprawl.

- Purpose 2 - Prevent neighbouring towns merging into one another

Rating: Relatively Limited

The sub-area does lie between the towns of Urmston & Davyhylme and Eccles, as well as between Irlam and Eccles. However, all three towns are already linked to a significant degree, limiting this land's role in preserving the gap.

- Purpose 3 - Assist in safeguarding the countryside from encroachment

Rating: Relatively Significant

Due to the openness and uncontained nature of the sub-area, its release would encroach on land which is perceived as countryside, and has a relatively strong relationship with adjacent open land.

- Purpose 4 - Preserve the setting and special character of historic towns

Rating: Limited/No

Land does not make a significant contribution to the setting of any historic town.

GM33-2

- Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

Rating: Equal contribution

All Green Belt land is considered to make an equal contribution to this purpose.

Figure A1.14a Extract of 07.01.09 Stage 2 Proposed 2019 GMSF Allocations (Site 6 includes GM33-1 and GM33-2 in this document).

Impact on adjacent Green Belt

Rating: No/negligible

The release of this sub-area, as part of the release of the Allocation as a whole, would lead to some degree of containment of retained Green Belt land to the east between the M60 and M62, however the latter contributes little to Green Belt purposes due to its containment and lack of distinction with the urban edge and as such its containment would not increase harm. The release would also result in a distinct revised Green Belt boundary to the west, defined by the M62, a railway line, the emerging Port Salford Rail link and Barton Moss Road.

Overall harm to Green Belt purposes from release of land

Moderate

Release of the sub-area, as part of the release of the Allocation as a whole, would constitute relatively significant sprawl and encroachment onto the countryside but a relatively limited impact on preventing the merger of towns. It would constitute a negligible impact on retained Green Belt land. Harm from the release of the sub-area is therefore assessed as moderate.

Figure A1.14b Extract of 07.01.09 Stage 2 Proposed 2019 GMSF Allocations (Site 6 includes GM33-1 and GM33-2 in this document)

Existing Use

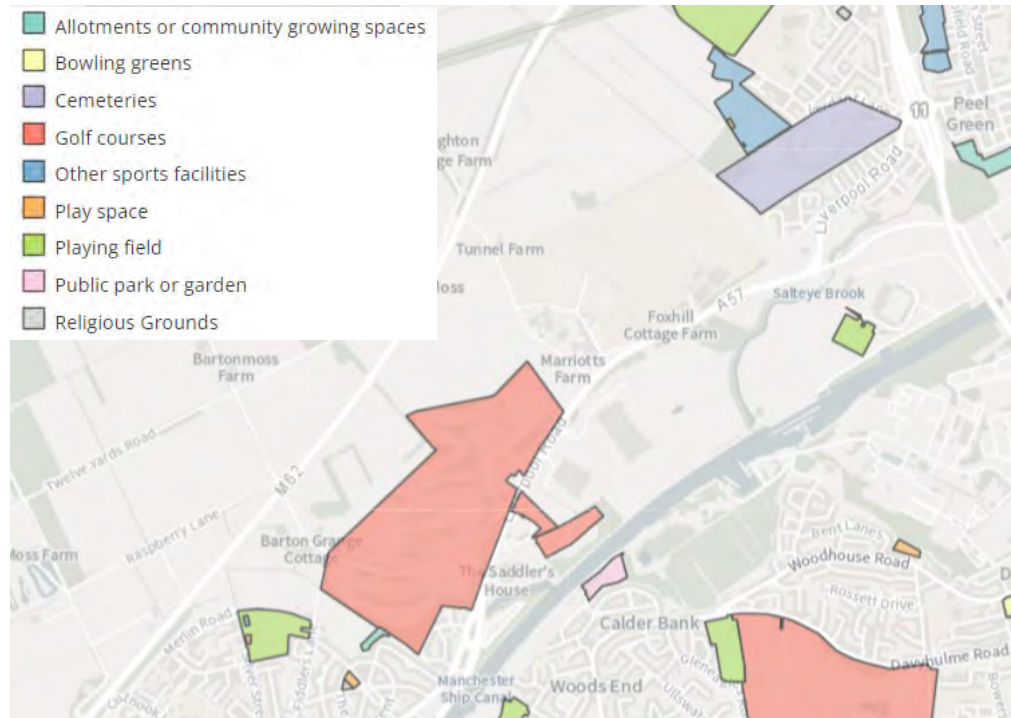


Figure A1.15 Open Spaces, Extract Mapping GM

Planning Policy Position.

Salford Local Plan

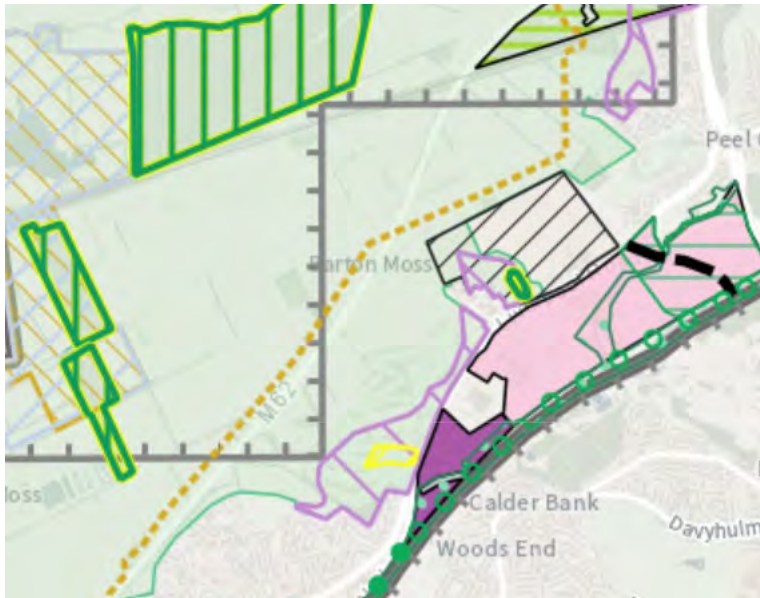


Figure A1.16
Extract Salford
Adopted
Proposals Map
(UDP, GM
Waste DPD, GM
Minerals DPD)

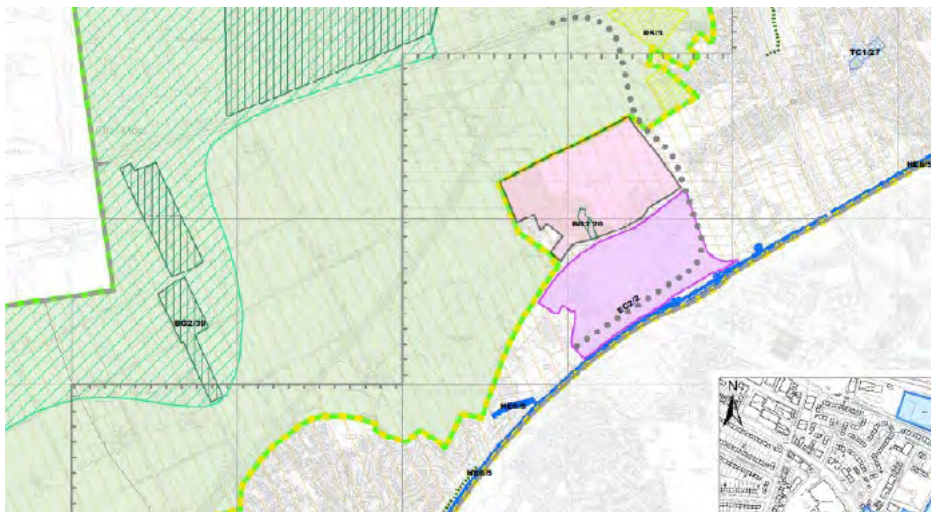


Figure A1.17
Extract: Publication Local Plan: Development Management Policies and
Designations Policies Map As amended by Proposed Modifications (January
2021)

Legend



Chapter 8 Area policies

- City Centre Salford (Local Plan: DM policies AP1 and TC1/1)
- Salford Quays (Local Plan: DM policies AP2 and TC1/5)
- Ordsall Waterfront (Local Plan: DM policy AP3)

Chapter 9 Economic development

- Port Salford (Local Plan: DM policy EC2/1)
- Port Salford rail link (Local Plan: DM policy EC2/2)

Chapter 12 Town centres and retail development

- City Centre Salford (Local Plan: DM policies AP1 and TC1/1)
- Town centres (Local Plan: DM policy TC1/2-7)
- Local centres (Local Plan: DM policy TC1/8-27)

Chapter 15 Accessibility

- Inwell Park Wharf (Local Plan: DM policy A5)
- Barton Aerodrome (Local Plan: DM policy A11)

Barton Aerodrome consultation zone (policy A11)

- All development (Local Plan: DM policy A11 (1))
- Buildings exceeding 15m in height (Local Plan: DM policy A11 (2))
- Buildings exceeding 45m in height (Local Plan: DM policy A11 (3))
- Buildings exceeding 90m in height (Local Plan: DM policy A11 (4))
- Development likely to attract birds (Local Plan: DM policy A11 (5))

Manchester Airport consultation zone (Policy A12)

- Buildings exceeding 90m in height (Local Plan: DM policy A12 (1))
- Development likely to attract birds or connected with aviation use (Local Plan: DM policy A12 (2))
- Wind turbine development (Local Plan: DM policy A12 (3))
- Safeguarded potential transport routes (Local Plan: DM policy A13)

Chapter 17 Energy

- District heat network development areas (Local Plan: DM policies EG1 and EG2)
- Wind turbine opportunity areas (Local Plan: DM policy EG2)

Chapter 18 Water

- Flood-related infrastructure - River Inwell flood control (Local Plan: DM policy WA3)

Chapter 20 Heritage

- Conservation areas (Local Plan: DM policy HE1/1-16)
- Scheduled ancient monuments (Local Plan: DM policy HE1/17-20)
- Registered parks and gardens (Local Plan: DM policy HE1/21-22)
- Canals (Local Plan: DM policy HE5/1-5)

Chapter 21 Green Belt and Agriculture

- Existing Green Belt (Local Plan: DM policy GB1)

Chapter 22 Green Infrastructure

- Chat Moss (Local Plan: DM policy GI2/1)
- Biodiversity heartland (Local Plan: DM policies GI2/2)
- Inwell Valley (Local Plan: DM policy GI3)
- West Salford Greenway (Local Plan: DM policy GI4)

Chapter 23 Biodiversity and goodiversity

- Great Manchester Wetlands Nature Improvement Area (Local Plan: DM policy BG1)
- Local nature reserves (Local Plan: DM policy BG2/1-9)
- Sites of biological importance (Local Plan: DM policy BG2/10-41)
- Ancient Woodland at Clifton Wood (Local Plan: DM policy BG2/42)
- Regionally Important Geological Site within Clifton Country Park (Local Plan: DM policy BG3/1)

Chapter 24 Recreation

- Existing Strategic recreation routes (Local Plan: DM policy R4/1-16)
- Hubs of citywide importance for outdoor sports (Local Plan: DM policy R5/1-5)

Places for Everyone, Publication Stage, August 2021

- 4.35 The first warehouse has been constructed and occupied, and the first phases in a series of major highway works have been completed including a new lifting bridge across the Manchester Ship Canal. A further three large-scale buildings to the south of the A57 have planning permission, and this plan takes land out of the Green Belt to the north of the A57 to enable a major expansion of the scheme. Port Salford as a whole could provide around 500,000 sqm of high quality floorspace within an integrated facility by the end of the Plan period.
- 4.36 The tri-modal facilities at Port Salford have the potential to deliver major benefits for Greater Manchester, not only supporting a larger and more sustainable logistics sector but also enabling the more efficient and cost-effective movement of components and products for manufacturers.
- 4.37 A key strength of Port Salford is its location near to the junction of the M60, M62 and M602 motorways. It is likely that major enhancements to the motorway network around Port Salford will be required, both to support the scheme and address wider congestion issues. The ongoing Manchester North West Quadrant Study is investigating the options for broader motorway network improvements, and it will be important to coordinate the development of Port Salford with any emerging proposals.

Figure AI.18 Extract: Places for Everyone, Publication Plan, August 2021, Policy JP-Strat 4 – Supporting Text

Policy JP-Strat 4

Port Salford

Port Salford will be developed as an integrated tri-modal facility, with on-site canal berths, rail spur and container terminal as essential elements of the scheme.

The overall facility will provide around 500,000 sqm of employment floorspace. This will include an extension of the permitted scheme onto land to the north and west of Barton Aerodrome, as allocated under Policy JP Allocation 29 'Port Salford Extension'.

The development of Port Salford must ensure that necessary transport infrastructure is delivered, including highway improvements to accommodate the likely scale of traffic generation, in a way that is compatible with proposals for the enhancement of the wider motorway network and the provision of appropriate sustainable travel opportunities to meet the needs of the employees accessing the site.

Figure AI.19 Extract: Places for Everyone, Publication Plan, August 2021, Policy JP-Strat 4

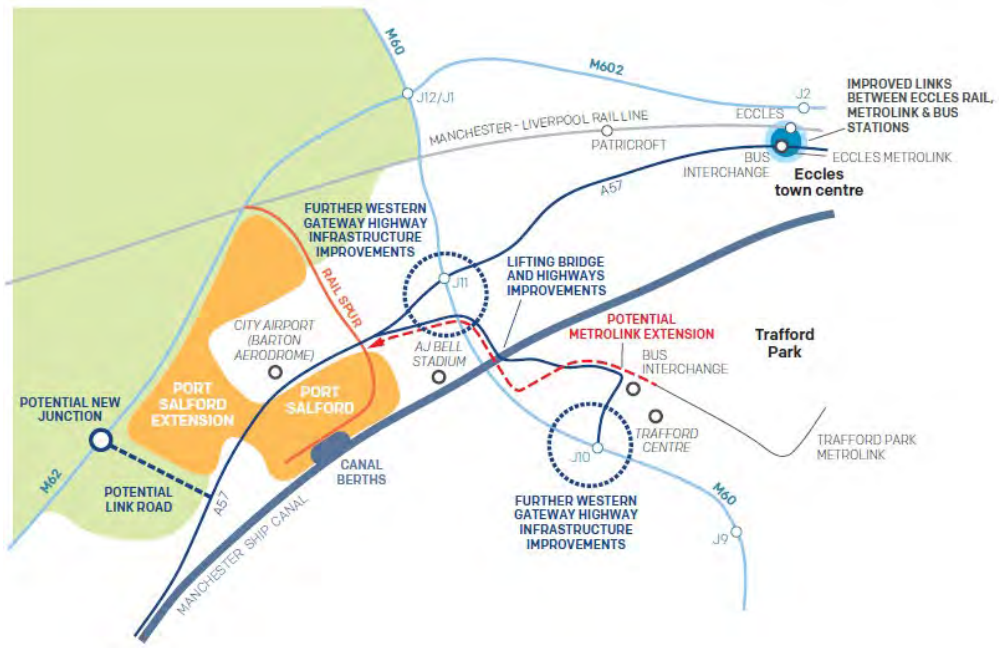
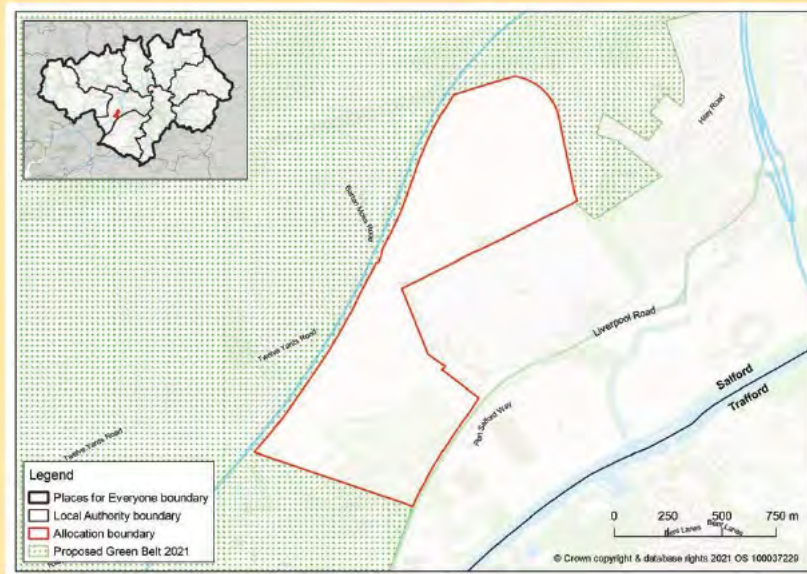


Figure A1.20 Extract: Places for Everyone, Publication Plan, August 2021 Figure 4.5

Policy JP Allocation 29

Port Salford Extension



Picture 11.41 JPA 29 Port Salford Extension

A major expansion of Port Salford accommodating around 320,000 sqm of employment floorspace will be delivered to the north and west of Barton Aerodrome, taking advantage of the new port facilities, rail link and highway improvements that will have been completed as part of the early phases of Port Salford. This will provide one of the most well-connected and market-attractive industrial and warehousing locations in the country, with a strong focus on logistics activities but also incorporating high quality manufacturing floorspace.

Development of this site will be required to:

1. Be in accordance with a masterplan/framework or Supplementary Planning Document (SPD) that has been developed in consultation with the local community and other stakeholders, and is considered acceptable by the city council, or in the case of an SPD adopted by the city council;

2. Involve high levels of community engagement, including through regular liaison meetings convened by the landowner and/or developers;
3. Not be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme to the south of the A57 have been completed and are operational and there is a clear commitment to the ongoing maintenance and full operation of this transport infrastructure;
4. Be designed to form part of an integrated facility with the Port Salford site to the south of the A57 and associated infrastructure, encouraging and enabling all occupiers to utilise the rail and water connections for freight movement;
5. Deliver necessary highway improvements of a strategic and local nature to cater for the additional traffic created by the expansion of Port Salford in a way that is compatible with any proposals for the enhancement of the wider motorway network and ensures the safe and efficient operation of the local road network;
6. Incorporate suitable HGV parking provision to cater for the area's anticipated use, including as appropriate stop over provision, and amenity facilities to serve the needs of HGV drivers;
7. Provide high quality walking and cycling routes from across the site to the bus stops on the A57 and the wider pedestrian and cycling network including Port Salford Greenway;
8. Maximise links to existing public transport services and support new routes and enhanced services as appropriate, including accommodating a potential extension of the Trafford Park Metrolink line to serve Port Salford;
9. Protect the full functioning and operational safety of Barton Aerodrome;
10. Conserve and where appropriate enhance, the significance of surrounding designated and non-designated heritage assets, including by:
 - i. Designing and landscaping the development to minimise any adverse impacts on the setting of Barton Aerodrome and the listed buildings within it;
 - ii. Where harm to Barton Aerodrome and any heritage asset within it is justified, opportunities shall be sought to better reveal the significance of the heritage asset, securing repairs to them, improving public access to them and/or providing publicly accessible information about them; and
 - iii. Being informed by the findings and recommendations of the Heritage Assessment (2019) in the Plan's evidence base and any Heritage Impact Assessment submitted as part of the planning application process.

11. Justify and provide full compensation for the loss of the golf course in accordance with paragraph 97 of the NPPF (February 2019) or any subsequent revision of national planning policy;
12. Incorporate high levels of landscaping, including the retention or replacement of existing woodland, hedgerows and ponds where practicable, so as to minimise the visual impact on the wider landscape (including on the remaining Green Belt separating the site from Irlam), achieve a minimum 10% net gain in biodiversity and mitigate the environmental impacts of development including noise;
13. Support the objectives for the Great Manchester Wetlands Nature Improvement Area and avoid harm to protected species;
14. Be supported by breeding and winter bird surveys to understand and minimise any adverse impact on bird species in this area. Surveys of potential compensation areas should also be undertaken to demonstrate that displacement is possible into the wider landscape;
15. Protect and enhance surrounding habitats, including the Foxhill Glen Site of Biological Importance;
16. Be supported by a project specific Habitats Regulation Assessment for any planning applications involving a floorspace of 1,000 sqm and above;
17. Mitigate the risk of surface water and groundwater flood risk, incorporating green sustainable drainage systems as part of the landscaping of the site;
18. Minimise the loss of the carbon storage function of the peat and avoid any adverse impacts on the hydrology of surrounding areas of peat/mossland, whilst ensuring that there is no potential for future problems of land stability or subsidence;
19. Protect the quality of watercourses through and around the site;
20. Protect the amenity of remaining residential properties within or on the edge of the allocation, including through the provision of appropriate landscaped buffers;
21. Provide an appropriate buffer to the Barton Moss Secure Care Centre on Barton Moss Road, to protect the privacy and amenity of residents and staff;
22. Implement an agreed strategy for dealing with its local air quality impacts;
23. Give positive consideration to the incorporation of renewable and low carbon energy infrastructure, including the potential for solar panels on buildings; and
24. Employ methods throughout the construction process that will ensure the potential for archaeology is investigated and any finds safeguarded and properly recorded.

Figure A1.21 Extract: Places for Everyone, Publication Plan, August 2021 Policy JP Allocation
29: Port Salford

- 11.262 The combination of excellent water, rail and road access, including direct shipping links to the post-panamax facility at the Port of Liverpool, will make Port Salford one of the most attractive locations in the country for industrial and warehousing development. An initial phase of development to the south of the A57 will provide around 150,000 sqm of primarily warehousing floorspace in total. Enabling its expansion to the north of the A57 to provide an additional 320,000 sqm of floorspace will help to significantly boost the competitiveness of Greater Manchester, offering the type of site that can compete with locations internationally for investment. The transport connections mean that the location is particularly attractive for logistics activities, but high quality manufacturing could also be provided in order to diversify the employment and investment opportunities in this part of Greater Manchester. Much of the site is grade 1 agricultural land, but the unique economic opportunity provided by the location is considered to outweigh the loss of the land's farming potential.
- 11.263 One of the key attributes of Port Salford is its potential to remove freight from roads and move it more sustainably by rail and water, and it will be vital that any development of the site takes advantage of this by utilising the infrastructure delivered as part of the permitted scheme. Nevertheless, the expansion of Port Salford will generate significant additional traffic and highway improvements to cater for these demands should be delivered as part of the site's development. The ongoing North West Quadrant Study, commissioned by Highways England, is investigating the options for broader motorway network improvements in this area, and it will be important to coordinate the development of Port Salford with any resulting proposals.
- 11.264 The retention of the Green Belt to the west and east of the site will help to prevent the coalescence of Irlam and Eccles. It will be important to make positive use of this Green Belt, including by expanding the facilities at Brookhouse Playing Fields to the east, and there may be opportunities to retain/reconfigure the former golf course to the west of the site. Even with the retention of part of the Green Belt, the scale of the development is likely to have a significant visual impact, and it will be very important for it to be integrated into the landscape as far as possible, particularly through the provision of high quality green infrastructure.

Figure A1.22 Extract: Places for Everyone, Publication Plan, August 2021 Policy JP Allocation 29: Port Salford, Supporting Text.

Exceptional Circumstances

PIE2021 Allocation	1. Justification for inclusion	2. Harm impact from allocation on Green Belt purposes	3. Harm impact to the Green Belt from release of allocation	4. Allocation boundaries	5. Mitigation to address Green Belt harm identified
JPA29 Port Salford Extension	<ul style="list-style-type: none"> The site meets Criterion 2 of the Site Selection criteria, as its proximity to the tri-modal connections to be provided as part of the first phase of Port Salford to the south of the A57 are identified as a particular opportunity in this regard. The site meets Criterion 5 of the Site Selection criteria, as it would provide employment opportunities 	<ul style="list-style-type: none"> The GM GB Harm assessment of the proposed 2019 GMSF allocations splits the allocation into northern and southern portions however its conclusions in respect of the impact on Green Belt purposes are the same. It describes that the release of the allocation would have a relatively significant role in respect 	<ul style="list-style-type: none"> The GM GB Harm Assessment of the proposed 2019 GMSF allocations identifies that the release of the allocation would cause 'moderate' harm to Green Belt purposes and 'no/negligible' harm to adjacent Green Belt. In terms of cumulative harm on Strategic Green Belt Area 7, the 2020 cumulative harm assessment identifies that the release would lead to greater containment of the remaining Green Belt to the south and north 	<ul style="list-style-type: none"> The revised Green Belt boundary would be defined by the M62 to the north west of the allocation. To the north east the boundary between the allocation and the Green Belt would be marked by the proposed rail spur into the permitted Port Salford south of the A57. To the south west the boundary between the 	<ul style="list-style-type: none"> Evidence finds that the principal cause of harm from release of this Allocation would be from the loss of the Green Belt land within the Allocation itself, as opposed to its impact on retained Green Belt land. As such, mitigation measures would not reduce the harm of its release Relevant to the mitigation of potential Green Belt Harm, policy requirements for this

PfE2021 Allocation	1. Justification for inclusion	2. Harm impact from allocation on Green Belt purposes	3. Harm impact to the Green Belt from release of allocation	4. Allocation boundaries	5. Mitigation to address Green Belt harm identified
	<p>In proximity to relatively deprived communities.</p> <ul style="list-style-type: none"> The site meets Criterion 6 of the Site Selection criteria, as it potentially contributes to the business case to extend the Trafford Park Metrolink line over the Manchester Ship Canal into Salford The provision of 320,000 square metres of logistics based floorspace will make a significant contribution to the employment supply across Greater Manchester and support the delivery of a larger and more sustainable logistics sector. 	<p>of checking the unrestricted sprawl of the large built-up area (Purpose 1) and safeguarding the countryside from encroachment (Purpose 3). A Relatively Limited' no impact is identified in respect of preventing neighbouring towns from merging into one another (Purpose 2) and limited no impact in respect of preserving the setting and special character of historic towns (Purpose 4).</p> <ul style="list-style-type: none"> Only minor changes have been made to the allocation boundary since the time of this assessment and as such the conclusions remain valid. 	<p>east (Purposes 1 and 3). The allocation is identified as lying between Urmston and Eccles, as well as between Irlam and Eccles, but it is described that these settlements are already linked to a significant degree (Purpose 2).</p> <ul style="list-style-type: none"> The 2021 Addendum cumulative harm assessment, reflecting the most recent allocation boundaries as proposed in PfE, finds that changes to allocations within Strategic Area 7 have not affected this analysis. 	<p>allocation and retained Green Belt follows an indicative line for an A57/M62 link road. The link road will be considered further through ongoing transport assessment work and an appropriate boundary treatment could be considered through site masterplanning.</p> <ul style="list-style-type: none"> The GM GB Harm assessment of the proposed 2019 GMSF allocations identifies that the release of the Allocation would not weaken the Green Belt boundary. In addition, although its release would increase the containment of retained Green Belt land to the south and to the north east, this retained land does not make a greater contribution to the Green 	<p>allocation include the integration of high levels of landscaping to help minimise the visual impact on the wider landscape including on remaining Green Belt separating the site from Irlam.</p>

Figure AI.23 Extract: Appendix 2 of 07.01.25 Green Belt Topic Paper, the Case for Exceptional Circumstances, Local level exceptional circumstances.

1.3 The exceptional circumstances' case for reviewing Green Belt boundaries at the strategic level includes consideration of the following factors:

- The need to identify an appropriate growth and spatial option having considered other reasonable alternatives;
- The need to identify sufficient employment land to meet the overall economic growth strategy for the joint plan area;
- The need to identify sufficient land to meet the local housing need for the joint plan area;
- The site selection process for identifying strategic allocations in the PfE;
- An assessment of the overall harm caused by the releases from the Green Belt;
- Opportunities to help increase the beneficial use of remaining Green Belt, including interventions that meet green infrastructure and biodiversity net gain objectives.

Figure AI.24 Extract: Appendix 1 of 07.01.25 Green Belt Topic Paper, the Case for Exceptional Circumstances, Strategic Level Exceptional Circumstances.

8.	<p>The majority landowner Peel L&P supports the allocation and considers that, on the basis of technical analysis, there are no constraints to developing the site. However, they consider that some modifications to the site allocation policy are required in order to make it sound.</p>	<p>The modifications sought by the majority landowner relate to:</p> <ul style="list-style-type: none"> • The site allocation boundary to include land to the west of the allocation and east of Irlam and a small area to the south where the corner of proposed logistics units and highway infrastructure is proposed. • The first sentence of the policy, to increase the amount of employment floorspace to be accommodated within the site to 355,000sqm and 3,000sqm of ancillary floorspace. • The following criteria: 1 (masterplan requirement) and 3 (requirement that the development is not commenced until the identified infrastructure associated with the permitted Port Salford scheme have been completed and are operational). <p>The full summary of the main issues raised to this allocation includes a response to the suggested modifications to the relevant site allocation policy and boundary. However, no modifications are proposed or considered necessary to make the site allocation sound.</p>
----	--	--

Figure A1.24a Extract: of 11.04.13 Regulation 22 Summaries of Allocations Main Issues.

Impact on Heritage Assets

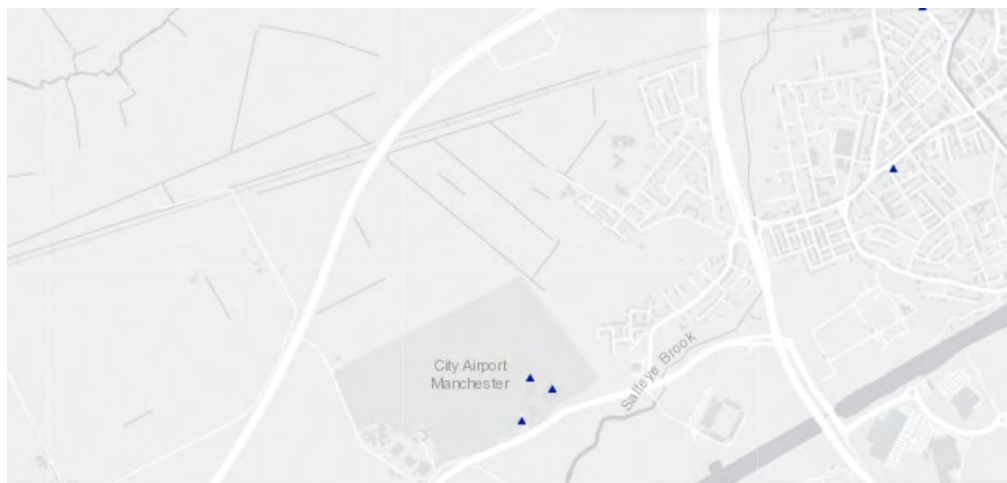


Figure A1.25, Listed Buildings and Structures Sources: Historic England <https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

Engineering, Safety and Operational Issues

Highways engineering / the ability of a site to provide safe access

- 1.10 The North West Quadrant Study being led by Highways England has, as part of a package of projects, identified a new junction on the M62 and a link road through to the A57.
- 1.11 The proposals for Port Salford include a new junction on the M62 motorway to the north of Irlam to serve a link road between the M62 and the A57, as set out later in this report.
- 1.12 A new motorway junction in this location would bring considerable relief to the local road network (both east to the M60/M602 and west to the M6), as well as reducing traffic on the M60 between Junctions 11 and 12. It would not only reduce the impact of HGV movements associated with the Site as they would have direct access to the Strategic Road Network, and would not need to route via the A57, but an M62 – A57 connection would also remove HGV traffic associated with PS1 and other nearby employment sites located along the A57. It would also provide improved accessibility for the existing community of Irlam

- 1.13 The new M62 – A57 link is widely recognised amongst the highway authorities as an essential part of development of the Site, although clearly its delivery would be beneficial to the wider Greater Manchester area; and not specific to the Site.
- 1.14 TfGM are undertaking a study to determine if Full-WGIS remains the optimal long-term solution to unlock economic growth in the area, and to determine whether other packages of infrastructure would be more appropriate which could then deliver the optimum scheme in phases. This study includes consideration of a new M62 – A57 link, and various combinations of infrastructure. Additionally, the ongoing North-West Quadrant Study is considering transport improvements in this area including the new M62 – A57 link. These studies could result in amendments or alternatives to Full-WGIS in order to maximise benefits.
- 1.15 As noted above, however, the highway infrastructure and its phased delivery are subject to further studies, and the exact details of the highway infrastructure requirements, and timing of its delivery relative to certain thresholds of development, will be informed by that work.
- 5.5 In addition to the rail and water infrastructure, the Site will also need to be supported by new highway infrastructure, and this is likely to include a new M62 – A57 link road which will also bring wider benefits to local businesses and residents. This infrastructure is currently being investigated as part of a study to determine the optimal long-term highway solution to unlock economic growth in the area. The details of the required highway infrastructure, and its timing relative to development of the Site, will be informed by that study as well as the North West Quadrant Study.

Figure A1.26 M62/A57 Link Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.

- 3.1 The development will comprise floorspace for logistics and manufacturing activities. Option 1 is for 356,350 sqm as shown in **Appendix A**, and Option 2 is for 514,700 sqm as shown in **Appendix B**.
- 3.2 Option 2 would also include a small-scale retail development comprising a petrol filling station, drive through restaurant and pub/restaurant, with a total floorspace of circa 1,600 sqm.

Figure A1.27 Development Options tested - Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.

- 3.7 Other vehicles would access the Site via an all movements junction. Given the proposals for a new M62 junction and link road to the A57, the most appropriate location for access into the Site would be from the new M62 – A57 link road, via a roundabout as shown in **Figure 7**. A three-arm configuration would provide access to Option 1 (Units A-F, and similarly a four-arm configuration would provide access to the additional land in Option 2 (Units H-J).
- 3.8 These arrangements are indicative and would be subject to detailed capacity testing at the appropriate stage. They may also be delivered in a phased manner e.g. from the A57 to the Site roundabout, followed by the onwards connection from the roundabout to the M62.

A1.28 Access and Phasing - Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.

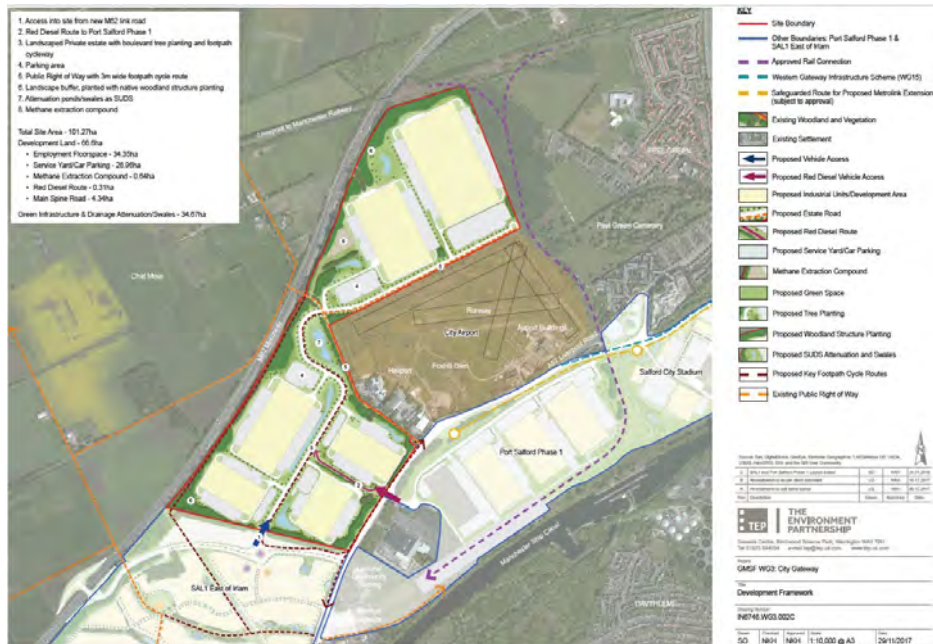


Figure A1.29 Option 1 (broadly consistent with Policy JP Allocation 29) - Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.



Figure A1.30 Option 2 (includes land proposed to be retained within the Green Belt) - Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.

10.7 This update to the Locality Assessment findings is based on trip rates that are considered more appropriate to the proposed use and the inclusion of a link road between the A57 Liverpool Road and M62 to support access to and from the allocation. It is notable that this relieves the impact of the proposed allocation on the local road network and the performance of the M60 junctions 10 and 11 are also improved when compared to the previous round of modelling. It is considered that testing of this scenario has provided sufficient confidence that the allocation can be delivered without unacceptable highways impacts. However, the nature of infrastructure interventions will be subject to further engagement, strategy and design work between stakeholders including Highways England GMCA/TfGM, Salford City Council and developers. There is the potential for alternative highways infrastructure proposals to be developed that could similarly mitigate the transport impacts of the proposed expansion of Port Salford. Further work will be needed to confirm the details of any infrastructure package to support delivery of the allocation, but the final package should ensure that the impact on the local and strategic highway network, as well as on broader environmental and social priorities, is acceptable. Discussions should continue with the relevant parties to identify and deliver the most appropriate solution.

Figure A1.31, Paragraph 10.7 of 10.07.71 Places for Everyone, JPA 29 Port Salford Extension Topic Paper, July 2021

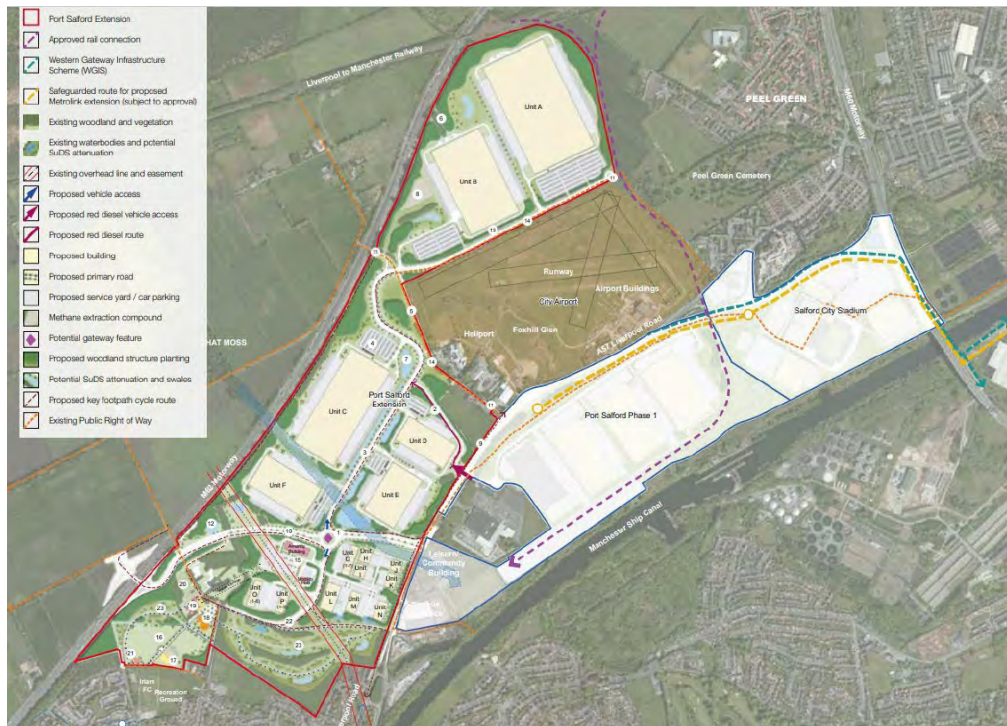


Figure A1.32 Figure 3.1 of Objection to Proposed Motorway Service Area at Junction 11 of the M62, Turley, January 2021 (identifies up to 3,000 sq. m of ancillary floorspace within land proposed to be the Green Belt, Site 7, not tested within the March 2019 Transport Statement)

3.32 Work is ongoing to establish the detail of delivery of the junction and the timescales for doing so. The appellant's reasons for rejecting the Site 6 are not balanced, justified or

Figure A1.33 Extract Objection to Proposed Motorway Service Area at Junction 11 of the M62, Turley, January 2022

2.	Development will exacerbate significant existing issues of congestion on nearby local road network (with reference made to there being only one road through the area) and strategic roads (M60)	<p>Issues of congestion on the highway network in proximity to the site are recognised and interventions are being investigated at a strategic level by National Highways through their North West Quadrant Study. The need for intervention is similarly recognise in the Greater Manchester Transport Strategy 2040 [09.01.01] , with the associated five year delivery plan 2021-26 [09.01.02], page 120] identifying that in the next five years options will be developed for multi-modal interventions to tackle congestion on the M60 North West Quadrant.</p> <p>A transport locality assessment has been prepared for the Port Salford Extension allocation [09.01.13 and 09.01.25]. There is sufficient confidence through the locality assessment undertaken that the allocation can be delivered without unacceptable highway impacts. Further work is needed to confirm the details of the required infrastructure package, but supporting evidence indicates that impacts can be adequately mitigated. Work in this area is continuing in discussion with National Highways. Given the above, no modifications are necessary to make the site allocation sound.</p>
----	--	---

Figure A1.33a Extract from I I 04 13 Regulation 22 Summaries of Allocations Main Issues, PFE, 2022

National Highways North West Quadrant Study Update

The Manchester North West Quadrant study

The Manchester North West Quadrant (MNWQ) is a Strategic Road Network project which is looking at ways to ease congestion and make journey times more reliable between junctions 8 to 18 of the M60.

The project began as a strategic study in 2014, as part of the government's first Roads Investment Strategy (RIS) and looked at providing large scale 'transformational' options.

Our assessments so far have shown that these transformational options would have significant adverse impacts on local communities and overall would not provide value for money.

The project will continue to identify packages of smaller schemes that can be developed through [RIS2 \(2020-2025\)](#). These may include some of the smaller improvements identified to date such as remodelling the M60 junctions at 12,13 & 14, linking the M62 to the A57 and capacity improvements between 9 and 10.

We will also consider other locations for improvements that will provide benefits on the M60 between Junctions 8 to 18 but a bypass between junctions 12 and 18 of the M60 will not be considered further.

Working closely with Transport for the North and Transport for Great Manchester, our study has so far supported the importance of the Simister Island Interchange in mitigating some impacts and there is now a [committed scheme in this location](#).

We have spoken with councils, key stakeholders, local business and groups to help assess local considerations and ensure we have built an accurate understanding of all benefits and constraints and we will continue to speak to them throughout the extended stage.

Using the information we have already gathered, we are looking at ways to reduce congestion and future proof the road by considering the benefits and potential impacts on motorists, the environment, our

neighbours and the economy. We'll then identify a shortlist of options we believe will tackle the issues, before consulting with the public.

The project is still in the very early stages and at this point there is no commitment from the Department of Transport to continue or to build if the options we identify don't solve the current problems or offer value for money.

Figure A1.34 Update on the North West Quadrant Study, National Highways Extracted from National Highways website on 12/2/2022 <https://nationalhighways.co.uk/our-work/north-west/manchester-north-west-quadrant/#overview>

Environmental Considerations

Other Environmental Constraints

Flood Zone / Risk;

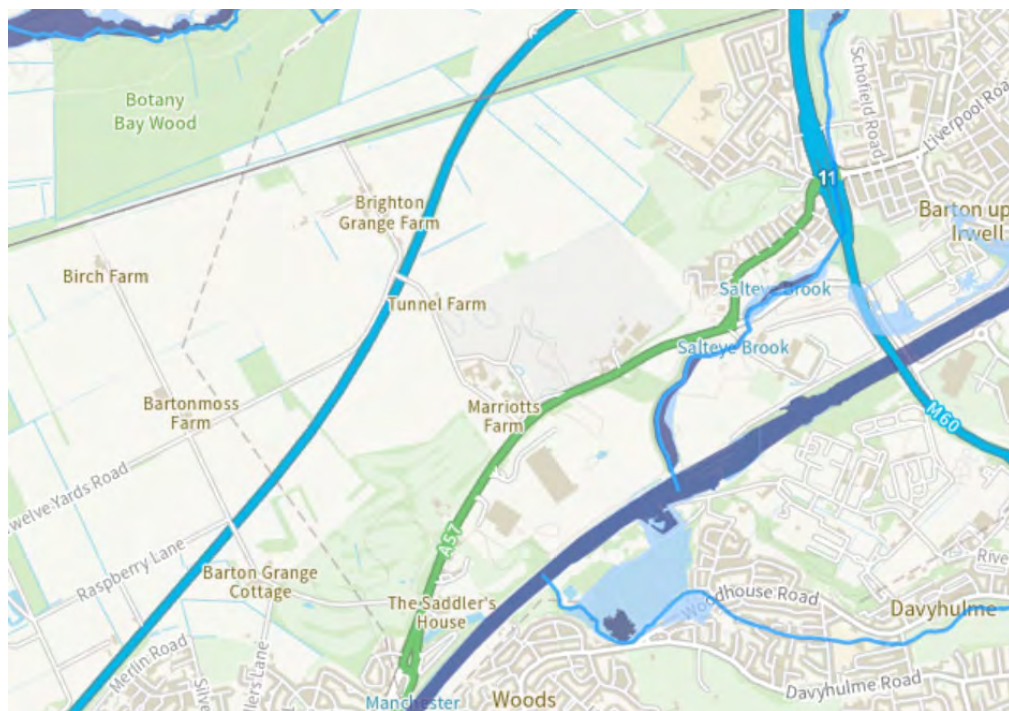


Figure A1.35 Extract EA Flood Map for Planning EA



Figure A1.36 Flood Risk from Reservoirs Extract Source: <https://check-long-term-flood-risk.service.gov.uk/map>

Ecology and Bio-diversity;

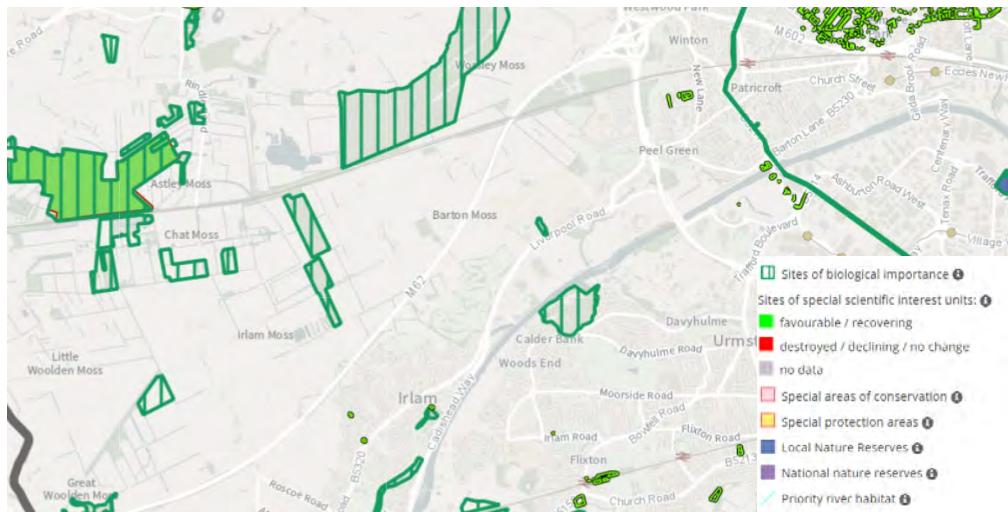


Figure A1.37 Extract Mapping GM – Sites of Biological Importance, and SAC's SSSI's

Ground conditions;

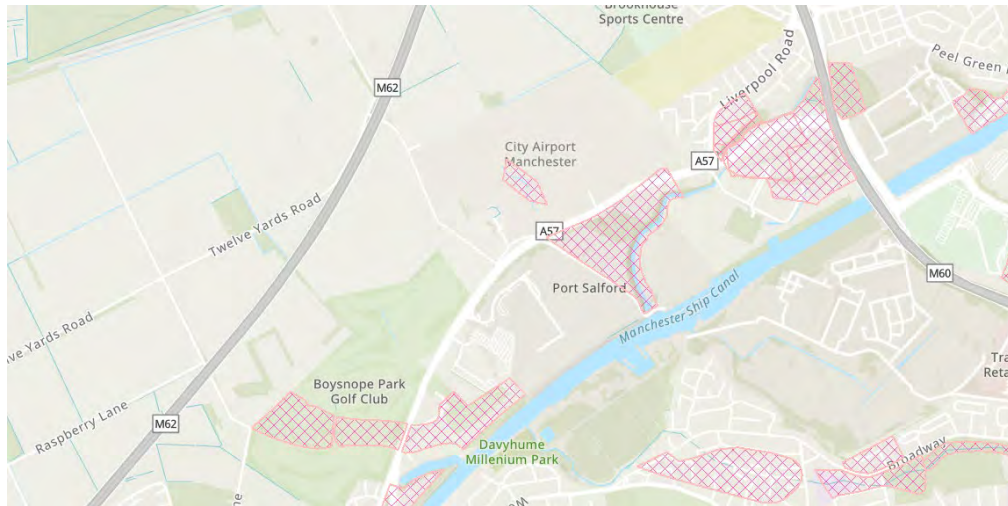


Figure A1. 38 Historic Landfill Sites, ArgGIS Map viewer

Existing infrastructure;

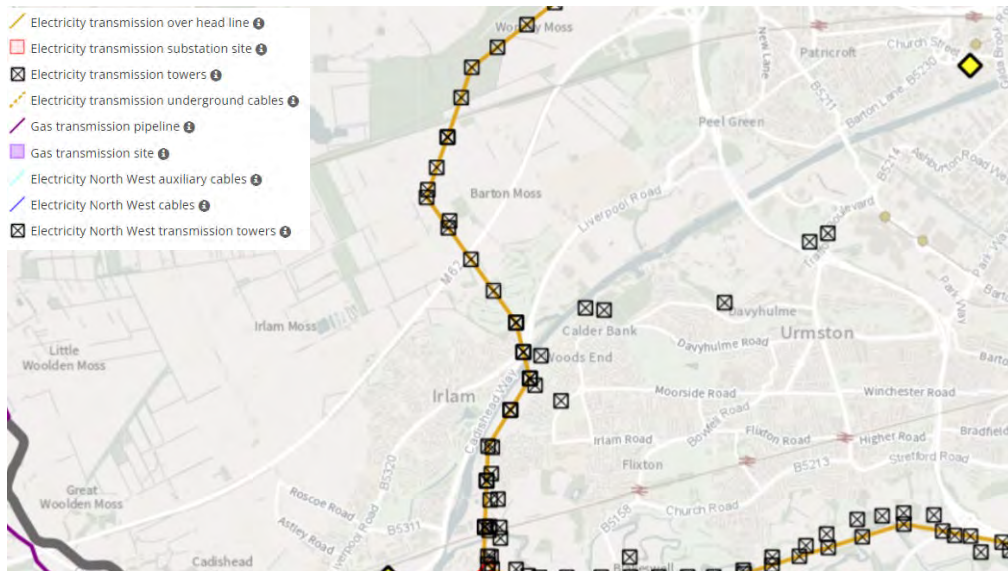


Figure A1.39 Existing Overhead Pipelines and Pylons, COMAH Sites, Transmission Pipelines Extract Mapping GM

Agricultural land grade

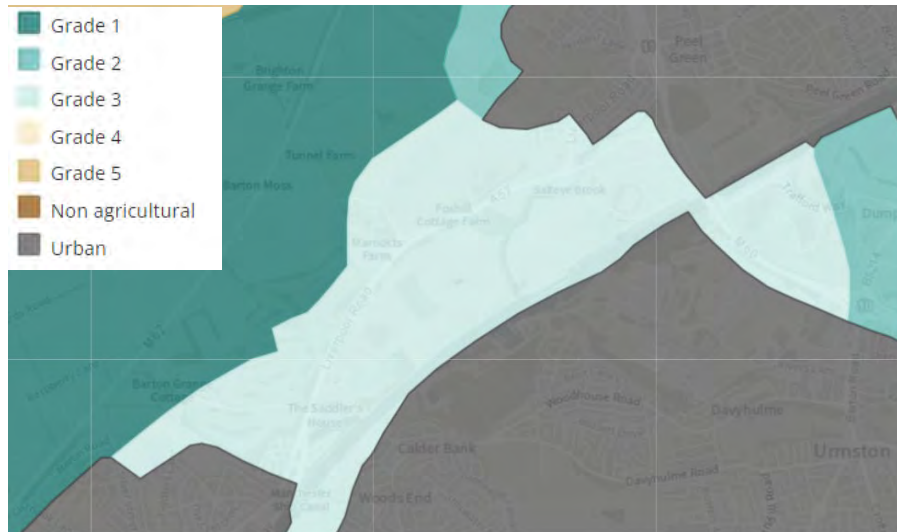


Figure A1.40 Agricultural Land Classification Extract Mapping GM

Appendix 2 – Site 7, Junction I I A South West Quadrant



Figure A2.1 Location Plan

Planning Criteria

Green Belt Status

07.01.04 Greater Manchester Green Belt Assessment, 2016 LUC

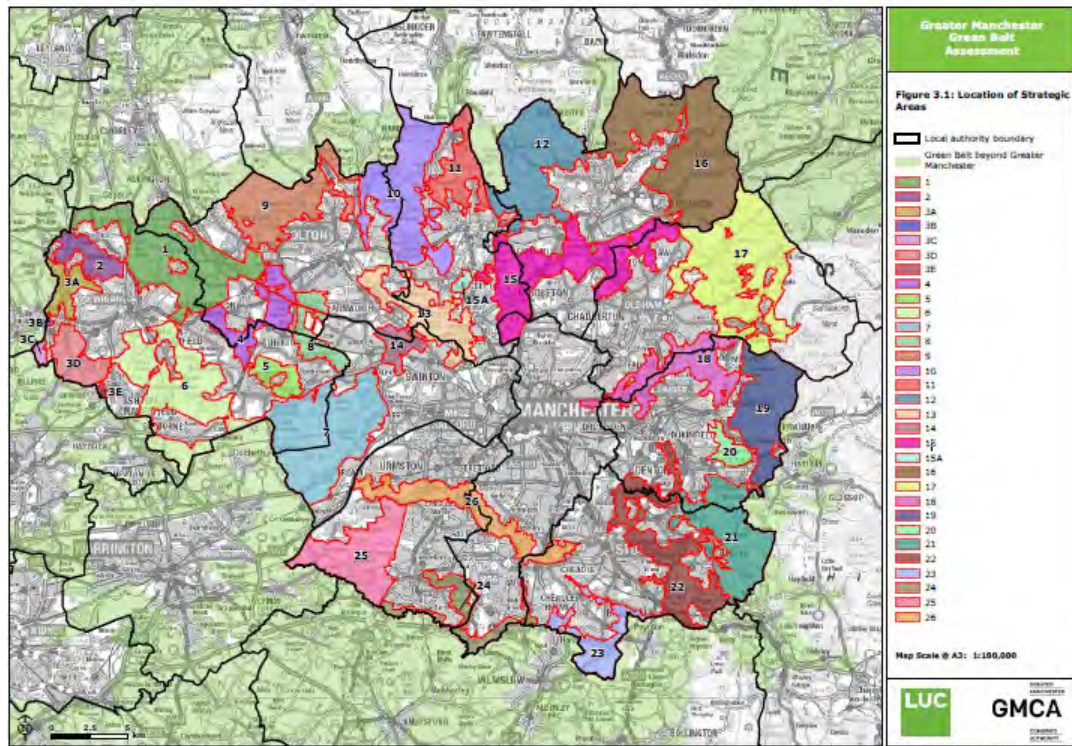


Figure A2.2 Location of Strategic Areas, Extract 07.01.04 Greater Manchester Green Belt Assessment 2016

Table 4.19: Assessment ratings for Strategic Green Belt Areas in Salford

Strategic Green Belt Area	Strategic Green Belt Area assessment ratings			
	Purpose 1	Purpose 2	Purpose 3	Purpose 4
7	Moderate-Strong	Strong	Moderate-Strong	Weak
8	Moderate-Strong	Strong	Weak-Moderate	Weak-Moderate
13	Strong	Strong	Moderate	Moderate
14	Moderate-Strong	Moderate-Strong	Weak	No contribution

Figure A2.3 Findings for Strategic Areas Extract 07.01.04 Greater Manchester Green Belt Assessment 2016

Parcel Ref	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Strategic GB Area
SA29	Strong	Weak	Weak	Weak	No Contribution	7
SA30	Strong	Moderate	Weak	Moderate	No Contribution	7
SA32	Strong	Strong	Moderate	Moderate	No Contribution	7
SA33	Strong	Strong	Moderate	Moderate	No Contribution	7
SA34	Moderate	Moderate	Moderate	Weak	No Contribution	7
WG101	Strong	Strong	Moderate	Moderate	No Contribution	7

Figure A2.4 Findings for Parcels Extract 07.01.04 Greater Manchester Green Belt Assessment 2016

Extract from Appendix 4.7 of the Greater Manchester Green Belt Assessment (07.01.04)

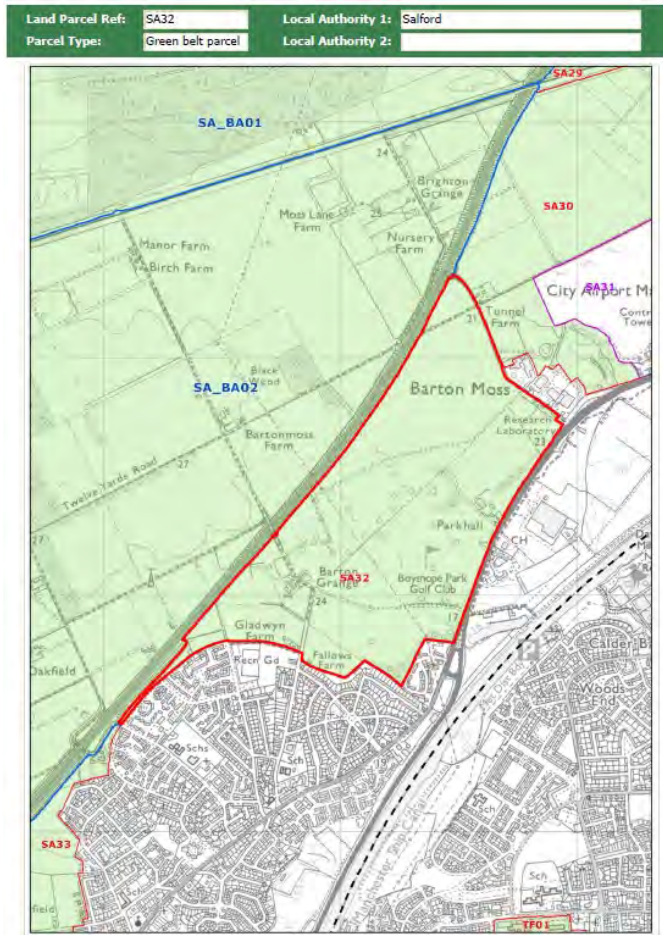


Figure A2.5 Parcels SA32 Extract 07.01.04 Greater Manchester Green Belt Assessment 2016

Land Parcel Ref:	SA32	Local Authority 1:	Salford
Parcel Type:	Green belt parcel	Local Authority 2:	

Parcel Description

This parcel is located on the northern urban edge of Irlam, within the Salford Borough area. The parcel contains flat land comprising predominantly of the Boysnope Park Golf Course. Other land cover includes a number of large arable and smaller pastoral fields. Built development is limited to farmsteads and the golf course clubhouse. There are no large public roads running through the parcel, though the M62 defines the northern and western boundary.

Purpose 1 - Check the unrestricted sprawl of large built up areas

1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?

Rating:

Notes:

The parcel lies adjacent to Irlam. There are few urbanising features within the parcel. Built development within the parcel includes the Boysnope Park Golf clubhouse, assess and parking, and small scale commercial development to the south. There is a strong sense of openness within the parcel due to a land cover of farmland, woodland shelter belt and managed golf course. The parcel plays a strong role in checking the unrestricted sprawl of Irlam.

1b - Does the parcel protect open land from the potential for urban sprawl to occur?

Rating:

Notes:

The parcel lies adjacent to Irlam. The urban boundary of Irlam is comprised of residential gardens. The M62 to the northwest is a strong barrier feature preventing the sprawl of urban development within the parcel. The parcel plays a strong role in inhibiting ribbon development south of Barton Moss Road and west of the A57 and along the internal access road Fiddlers Lane to the south-west.

Purpose 2 - To prevent neighbouring towns merging into one another

2a - Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?

Rating:

Notes:

The parcel forms part of a gap between the settlements of Irlam and Eccles. The parcel creates a sense of separation between Irlam and Eccles when travelling along the A57. There is a significant amount of development taking place south of the A57 including an inter-modal freight facility and retail associated with the existing AJ Bell Stadium. This will increase the importance of this parcel in preventing the further merging of settlements.

Figure A2.6a Findings for Parcels 32 Extract 07.01.04 Greater Manchester Green Belt Assessment 2016

Land Parcel Ref:	SA32	Local Authority 1:	Salford
Parcel Type:	Green belt parcel	Local Authority 2:	

Purpose 3 - To assist in safeguarding the countryside from encroachment

3a - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?
Has the parcel already been affected by encroachment of urbanised built development?

Rating:

Notes:

There is a limited sense of urban encroachment within the parcel as a result of Boysnope Park Golf Club and small scale commercial development. However, the parcel still displays some of the characteristics of the countryside despite these urbanising influences. Neighbouring urban development has a limited visual influence on the rural character of the parcel.

Purpose 4 - To preserve the setting and special character of historic towns

4a - Does the parcel contribute to the setting and 'special character' of a historic town(s)?

Rating:

Notes:

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlements of Astley, Barton upon-Irwell, Ellesmere Park (Eccles), Monton Green (Eccles) and Worsley. In practice, the parcel has a very limited or no relationship (visual or physical) with any of the historic settlements and does not play role in their setting or significance. This is largely due to visual screening provided by buildings, roads, and trees etc.; the parcel's flat and low-lying topography; and the relatively large distance between the parcel and nearest historic settlement (Barton upon-Irwell 2.6km away).

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is difficult to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore this study will not undertake a parcel by parcel assessment of the contribution made in relation to Purpose 5.

Figure A2.6b Findings for Parcels 32 Extract 07.01.04 Greater Manchester Green Belt Assessment 2016

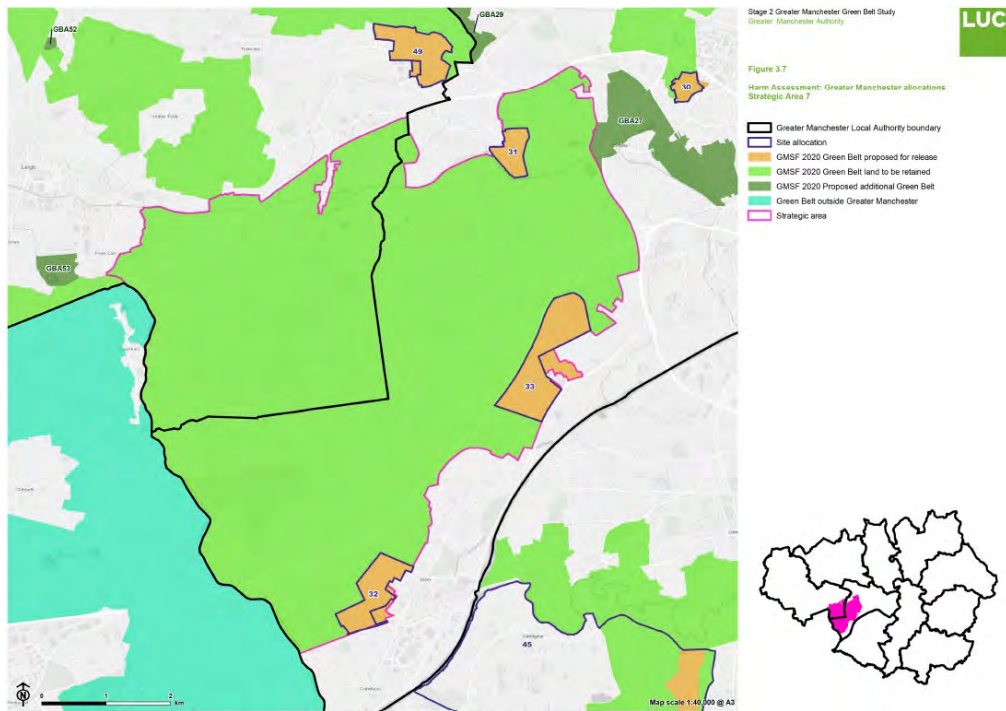


Figure A2.7 Extract 07.01.07 Stage 2 Green Belt Study, Cumulative Assessment of Proposed 2020 GMSF allocations.

*note that Port Salford reference is GM33 at this point

Purpose 1: To check the unrestricted sprawl of large built-up areas

3.47 This low-lying area has seen historic patterns of urban sprawl, evident at Irlam where the gradual development, field by field, is evident. Release of the allocations would in itself constitute urban sprawl, and the release of GM33 to the south of the M62 would lead to greater containment of the remaining Green Belt to the south and north east. The remainder of SGBA7

would continue to play a role checking the unrestricted sprawl of Leigh, Astley, Irlam and Eccles. The sizeable Green Belt addition of the West Salford Greenway would add to the SGBA's contribution in checking sprawl, specifically from Worsley, Swinton and Monton, however its containment by the surrounding urban edge limits the extent to which the land plays a role in preventing sprawl.

Purpose 2: To prevent neighbouring towns merging into one another.

3.48 This area of Green Belt contributes to maintaining the separation of settlements around its fringes including Irlam, Leigh, and Astley. It also helps maintain separation from settlements beyond the GM boundary, including north east Warrington, Culcheth and the village of Glazebury. Release of allocation GM31 would narrow the gap between Boothstown and Ellenbrook, and Worsley, although significant separating features mean the Green Belt here would continue to contribute to preventing the settlements from merging. Allocation GM32 does not lie in a narrow gap between towns, whereas allocation GM33 lies between Urmston and Eccles, as well as between Irlam and Eccles, which are already linked to a significant degree. Release of the allocations would not affect any other settlement gaps in SGBA 7. The Green Belt addition provides a degree of separation between Worsley and Monton and Eccles to the south, but this is limited and the settlements have already partially merged.

Purpose 3: To assist in safeguarding the countryside from encroachment.

3.49 The rural character of SGBA7 is reasonably intact, with a mix of agriculture and woodland occupying the former mosslands. The north of the area has been affected by mineral working, while the periphery is affected by transport infrastructure. Release of the allocations would encroach on the countryside and GM33 would lead to a degree of containment. The majority of the remaining area of the SGBA would however continue to safeguard the countryside from encroachment. The Green Belt addition is generally open but contains some urbanising development and is surrounded by the urban edge, limiting the extent to which the area is perceived as countryside.

LUC 129

Purpose 4: To preserve the setting and special character of historic towns.

3.50 Large parts of this SGBA make no contribution to this purpose, Release of allocation GM31 could detract from the setting and special character of Worsley to a relatively limited extent, although the West Salford Greenway GBA27 plays an important role in the setting of the Worsley and its designation could help to preserve this. Release of the other allocations would not have an effect on preserving the setting and special character of any other historic towns in the SGBA.

Figure A2.8 Extract 07.01.07 Stage 2 Green Belt Study, Cumulative Assessment of Proposed 2020 GMSF allocations.

Existing Use

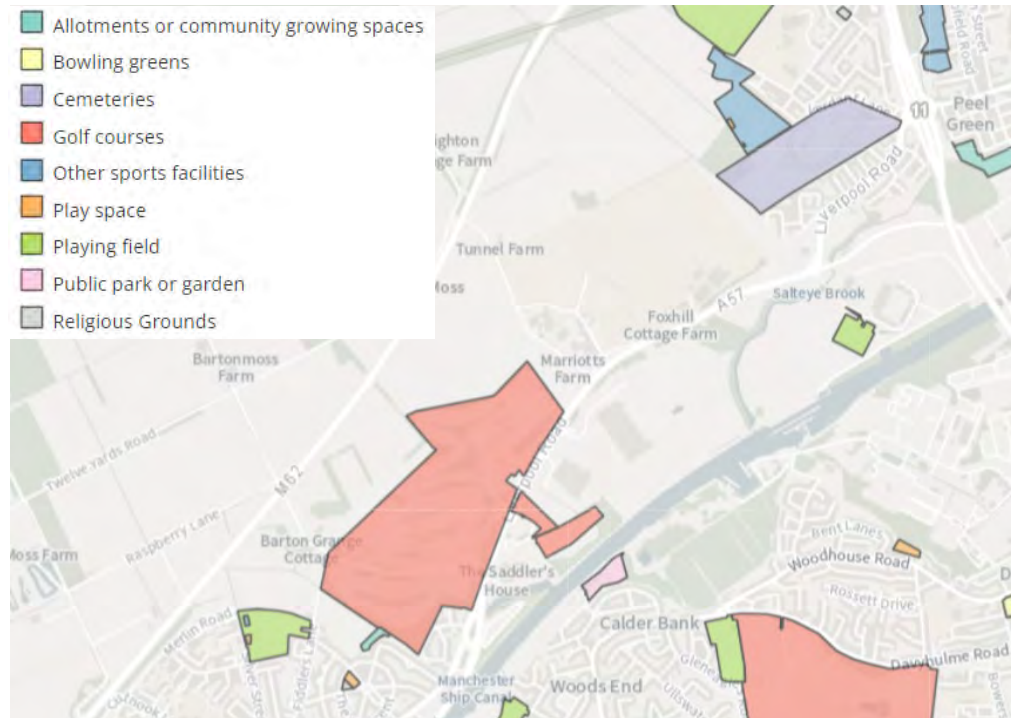


Figure A2.9 Open Spaces, Extract Mapping GM

Planning Policy Position.

Salford Local Plan

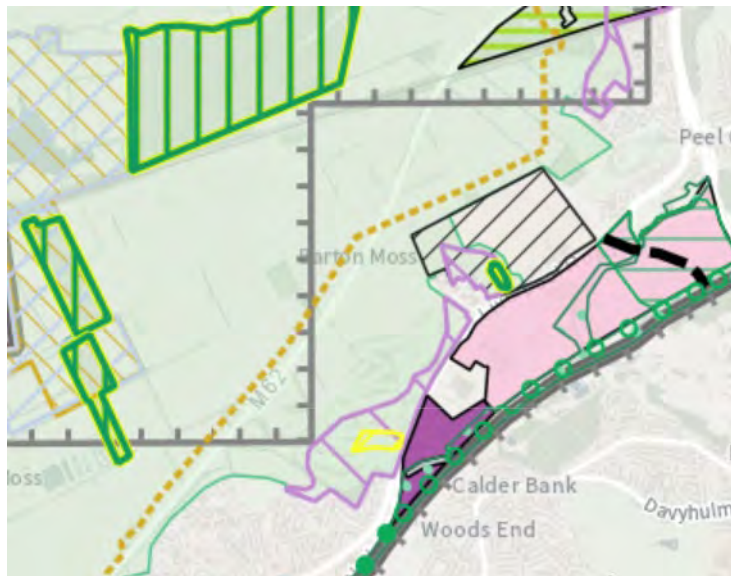


Figure A2.10
 Extract Salford
 Adopted
 Proposals Map
 (UDP, GM
 Waste DPD,
 GM Minerals

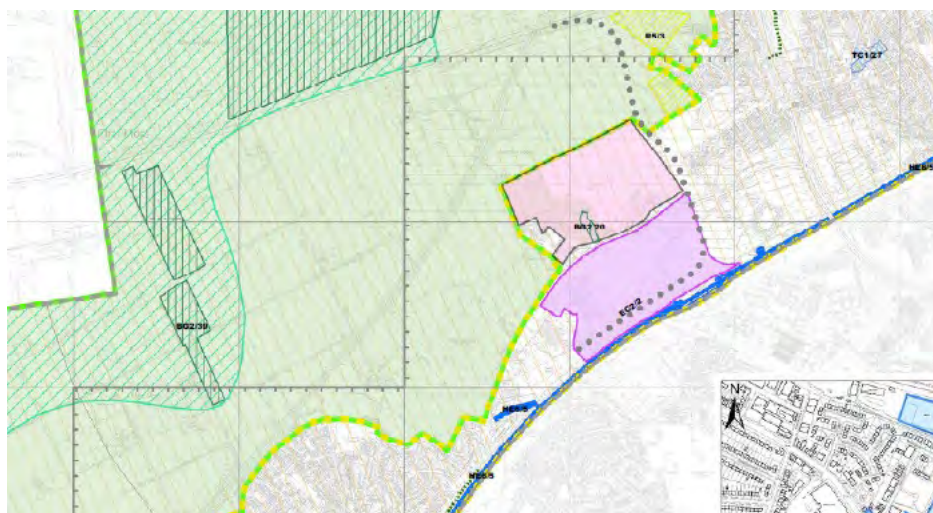


Figure A2.11
 Extract: Publication Local Plan: Development Management Policies and
 Designations Policies Map As amended by Proposed Modifications (January
 2021)

Legend



Chapter 8 Area policies

-  City Centre Salford (Local Plan: DM policies AP1 and TC1/1)
-  Salford Quays (Local Plan: DM policies AP2 and TC1/5)
-  Ordsall Waterfront (Local Plan: DM policy AP3)

Chapter 9 Economic development

-  Port Salford (Local Plan: DM policy EC2/1)
-  Port Salford rail link (Local Plan: DM policy EC2/2)

Chapter 12 Town centres and retail development

-  City Centre Salford (Local Plan: DM policies AP1 and TC1/1)
-  Town centres (Local Plan: DM policy TC1/2-7)
-  Local centres (Local Plan: DM policy TC1/8-27)

Chapter 15 Accessibility

-  Inwell Park Wharf (Local Plan: DM policy A5)
-  Barton Aerodrome (Local Plan: DM policy A11)

Barton Aerodrome consultation zone (policy A11)

-  All development (Local Plan: DM policy A11 (1))
-  Buildings exceeding 15m in height (Local Plan: DM policy A11 (2))
-  Buildings exceeding 45m in height (Local Plan: DM policy A11 (3))
-  Buildings exceeding 90m in height (Local Plan: DM policy A11 (4))
-  Development likely to attract birds (Local Plan: DM policy A11 (5))

Manchester Airport consultation zone (Policy A12)

-  Buildings exceeding 90m in height (Local Plan: DM policy A12 (1))
-  Development likely to attract birds or connected with aviation use (Local Plan: DM policy A12 (2))
-  Wind turbine development (Local Plan: DM policy A12 (3))
-  Safeguarded potential transport routes (Local Plan: DM policy A13)

Chapter 17 Energy

-  District heat network development areas (Local Plan: DM policies EG1 and EG2)
-  Wind turbine opportunity areas (Local Plan: DM policy EG2)

Chapter 18 Water

-  Flood-related infrastructure - River Inwell flood control (Local Plan: DM policy WA3)

Chapter 20 Heritage

-  Conservation areas (Local Plan: DM policy HE1/1-16)
-  Scheduled ancient monuments (Local Plan: DM policy HE1/17-20)
-  Registered parks and gardens (Local Plan: DM policy HE1/21-22)
-  Canals (Local Plan: DM policy HE5/1-5)

Chapter 21 Green Belt and Agriculture

-  Existing Green Belt (Local Plan: DM policy GB1)

Chapter 22 Green Infrastructure

-  Chat Moss (Local Plan: DM policy GI2/1)
-  Biodiversity heartland (Local Plan: DM policies GI2/2)
-  Inwell Valley (Local Plan: DM policy GI3)
-  West Salford Greenway (Local Plan: DM policy GI4)

Chapter 23 Biodiversity and goodiversity

-  Great Manchester Wetlands Nature Improvement Area (Local Plan: DM policy BG1)
-  Local nature reserves (Local Plan: DM policy BG2/1-9)
-  Sites of biological importance (Local Plan: DM policy BG2/10-41)
-  Ancient Woodland at Clifton Wood (Local Plan: DM policy BG2/42)
-  Regionally Important Geological Site within Clifton Country Park (Local Plan: DM policy BG3/1)

Chapter 24 Recreation

-  Existing Strategic recreation routes (Local Plan: DM policy R4/1-16)
-  Hubs of citywide importance for outdoor sports (Local Plan: DM policy R5/1-5)

Places for Everyone, Publication Draft, August 2021

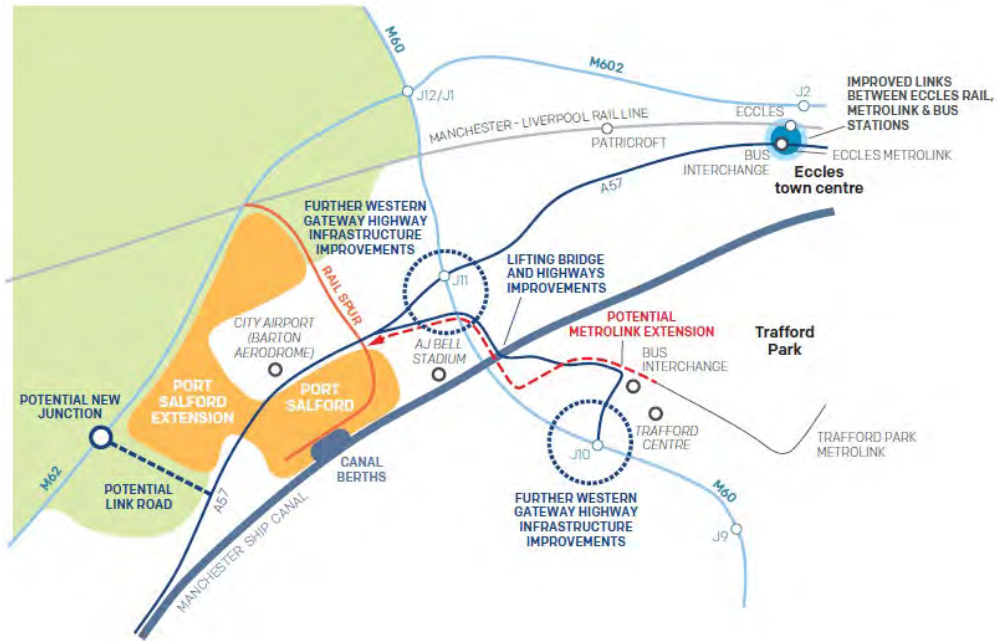


Figure A2.12 Extract: Places for Everyone, Publication Plan, August 2021 Figure 4.5

11.264 The retention of the Green Belt to the west and east of the site will help to prevent the coalescence of Irlam and Eccles. It will be important to make positive use of this Green Belt, including by expanding the facilities at Brookhouse Playing Fields to the east, and there may be opportunities to retain/reconfigure the former golf course to the west of the site. Even with the retention of part of the Green Belt, the scale of the development is likely to have a significant visual impact, and it will be very important for it to be integrated into the landscape as far as possible, particularly through the provision of high quality green infrastructure.

Figure A2. 13 Extract Places for Everyone, Publication Draft, August 2021, Policy JP Allocation 29 Port Salford, Supporting Text

- 3.28 Strategic employment locations such as City Gateway typically provide a range of elements which are ancillary to the principal employment floorspace. They provide important amenities and supporting facilities which complement and enhance the overall function and attractiveness and ultimate success as a high quality and attractive employment location. This can include food and drink outlets, a hotel, PFS and haulier parking.
- 3.29 Peel's most recent submission to the PFE consultation recognised this, making provision for a cluster of such facilities to serve the Port Salford development whilst also being able to function as a MSA to serve users of the M62 and A57 with very limited alteration, including a sustainable amenity building housing a farm shop and kitchen along with mobility hub. The representation requested amendments to the policy wording to allow for this facility to be delivered to support and complement the employment development and ensure the policy is compatible with Peel's proposals.
- 3.30 The amendments propose up to 3,000 sqm of ancillary floorspace. An extract of the masterplan is proposed below. Whilst this shows the proposed facility in Site 7 (based on the appellant's definition of alternative sites), this is merely one configuration, and there is sufficient flexibility to accommodate such a facility within Site 6 whilst still ensuring at least 320,000sq m of employment floorspace can be delivered, consistent with the emerging policy.

Figure A2.14 Extract Objection to Proposed Motorway Service Area, J11 M62, Warrington
PINS Ref. APP/M0655/W/21/3288180 LPA ref. 2019/35726, Turley, January 2022

Impact on Heritage Assets



Figure A2.15 Listed Buildings and Structures: Source Historic England
<https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

Engineering, Safety and Operational Issues

Highways engineering /the ability of a site to provide safe access

- 1.10 The North West Quadrant Study being led by Highways England has, as part of a package of projects, identified a new junction on the M62 and a link road through to the A57.
- 1.11 The proposals for Port Salford include a new junction on the M62 motorway to the north of Irlam to serve a link road between the M62 and the A57, as set out later in this report.
- 1.12 A new motorway junction in this location would bring considerable relief to the local road network (both east to the M60/M602 and west to the M6), as well as reducing traffic on the M60 between Junctions 11 and 12. It would not only reduce the impact of HGV movements associated with the Site as they would have direct access to the Strategic Road Network, and would not need to route via the A57, but an M62 – A57 connection would also remove HGV traffic associated with PS1 and other nearby employment sites located along the A57. It would also provide improved accessibility for the existing community of Irlam

- 1.13 The new M62 – A57 link is widely recognised amongst the highway authorities as an essential part of development of the Site, although clearly its delivery would be beneficial to the wider Greater Manchester area; and not specific to the Site.
- 1.14 TfGM are undertaking a study to determine if Full-WGIS remains the optimal long-term solution to unlock economic growth in the area, and to determine whether other packages of infrastructure would be more appropriate which could then deliver the optimum scheme in phases. This study includes consideration of a new M62 – A57 link, and various combinations of infrastructure. Additionally, the ongoing North-West Quadrant Study is considering transport improvements in this area including the new M62 – A57 link. These studies could result in amendments or alternatives to Full-WGIS in order to maximise benefits.
- 1.15 As noted above, however, the highway infrastructure and its phased delivery are subject to further studies, and the exact details of the highway infrastructure requirements, and timing of its delivery relative to certain thresholds of development, will be informed by that work.
- 5.5 In addition to the rail and water infrastructure, the Site will also need to be supported by new highway infrastructure, and this is likely to include a new M62 – A57 link road which will also bring wider benefits to local businesses and residents. This infrastructure is currently being investigated as part of a study to determine the optimal long-term highway solution to unlock economic growth in the area. The details of the required highway infrastructure, and its timing relative to development of the Site, will be informed by that study as well as the North West Quadrant Study.

Figure A2.16 M62/A57 Link Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.

- 3.1 The development will comprise floorspace for logistics and manufacturing activities. Option 1 is for 356,350 sqm as shown in **Appendix A**, and Option 2 is for 514,700 sqm as shown in **Appendix B**.
- 3.2 Option 2 would also include a small-scale retail development comprising a petrol filling station, drive through restaurant and pub/restaurant, with a total floorspace of circa 1,600 sqm.

Figure A2.17 Development Options tested - Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.

- 3.7 Other vehicles would access the Site via an all movements junction. Given the proposals for a new M62 junction and link road to the A57, the most appropriate location for access into the Site would be from the new M62 – A57 link road, via a roundabout as shown in **Figure 7**. A three-arm configuration would provide access to Option 1 (Units A-F, and similarly a four-arm configuration would provide access to the additional land in Option 2 (Units H-J).
- 3.8 These arrangements are indicative and would be subject to detailed capacity testing at the appropriate stage. They may also be delivered in a phased manner e.g. from the A57 to the Site roundabout, followed by the onwards connection from the roundabout to the M62.

Figure A2.18 Access and Phasing - Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.



Figure A2.19 Option 2 (includes land proposed to be retained within the Green Belt) - Extract 10.07.60 Transport Supporting Statement, March 2019, TTCH obh Peel.

10.7 This update to the Locality Assessment findings is based on trip rates that are considered more appropriate to the proposed use and the inclusion of a link road between the A57 Liverpool Road and M62 to support access to and from the allocation. It is notable that this relieves the impact of the proposed allocation on the local road network and the performance of the M60 junctions 10 and 11 are also improved when compared to the previous round of modelling. It is considered that testing of this scenario has provided sufficient confidence that the allocation can be delivered without unacceptable highways impacts. However, the nature of infrastructure interventions will be subject to further engagement, strategy and design work between stakeholders including Highways England GMCA/TfGM, Salford City Council and developers. There is the potential for alternative highways infrastructure proposals to be developed that could similarly mitigate the transport impacts of the proposed expansion of Port Salford. Further work will be needed to confirm the details of any infrastructure package to support delivery of the allocation, but the final package should ensure that the impact on the local and strategic highway network, as well as on broader environmental and social priorities, is acceptable. Discussions should continue with the relevant parties to identify and deliver the most appropriate solution.

Figure A2.20, Paragraph 10.7 of 10.07.71 Places for Everyone, JPA 29 Port Salford Extension Topic Paper, July 2021

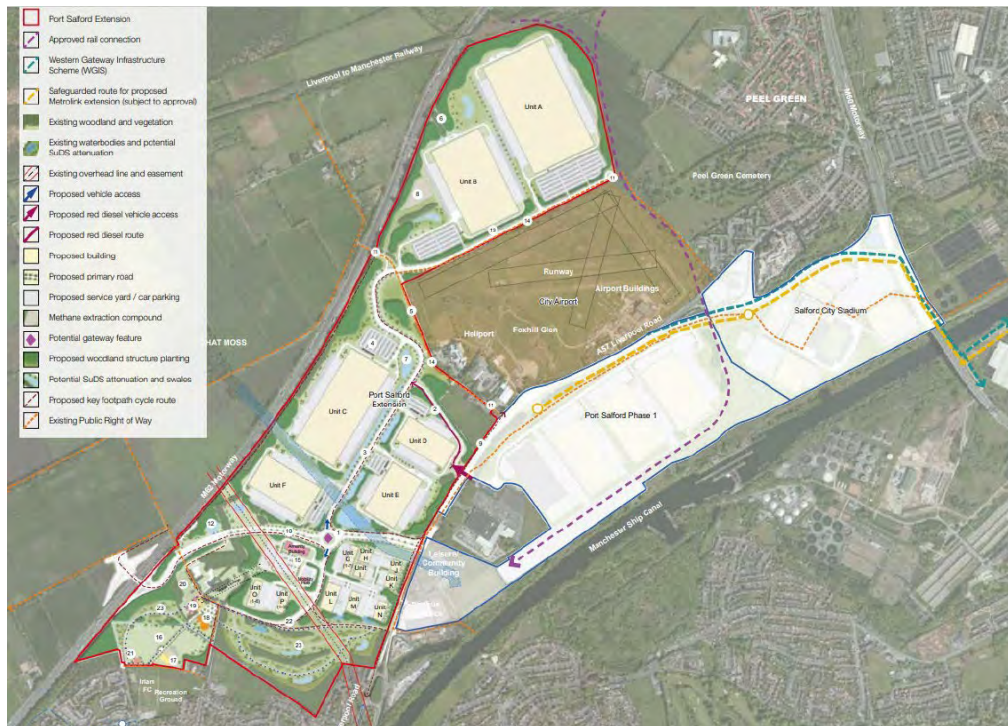


Figure A2.21 Figure 3.1 of Objection to Proposed Motorway Service Area at Junction 11 of the M62, Turley, January 2021 (identifies up to 3,000 sq. m of ancillary floorspace within land proposed to be the Green Belt, Site 7, not tested within the March 2019 Transport Statement)

3.32 Work is ongoing to establish the detail of delivery of the junction and the timescales for doing so. The appellant's reasons for rejecting the Site 6 are not balanced, justified or

Figure A2.22 Extract Objection to Proposed Motorway Service Area at Junction 11 of the M62, Turley, January 2021

2.	Development will exacerbate significant existing issues of congestion on nearby local road network (with reference made to there being only one road through the area) and strategic roads (M60)	<p>Issues of congestion on the highway network in proximity to the site are recognised and interventions are being investigated at a strategic level by National Highways through their North West Quadrant Study. The need for intervention is similarly recognised in the Greater Manchester Transport Strategy 2040 [09.01.01], with the associated five year delivery plan 2021-26 [09.01.02], page 120] identifying that in the next five years options will be developed for multi-modal interventions to tackle congestion on the M60 North West Quadrant.</p> <p>A transport locality assessment has been prepared for the Port Salford Extension allocation [09.01.13 and 09.01.25]. There is sufficient confidence through the locality assessment undertaken that the allocation can be delivered without unacceptable highway impacts. Further work is needed to confirm the details of the required infrastructure package, but supporting evidence indicates that impacts can be adequately mitigated. Work in this area is continuing in discussion with National Highways. Given the above, no modifications are necessary to make the site allocation sound.</p>
----	--	---

Figure A2.22a Extract from I I 04 13 Regulation 22 Summaries of Allocations Main Issues, PFE, 2022

National Highways North West Quadrant Study Update

The Manchester North West Quadrant study

The Manchester North West Quadrant (MNWQ) is a Strategic Road Network project which is looking at ways to ease congestion and make journey times more reliable between junctions 8 to 18 of the M60.

The project began as a strategic study in 2014, as part of the government's first Roads Investment Strategy (RIS) and looked at providing large scale 'transformational' options.

Our assessments so far have shown that these transformational options would have significant adverse impacts on local communities and overall would not provide value for money.

The project will continue to identify packages of smaller schemes that can be developed through [RIS2 \(2020-2025\)](#). These may include some of the smaller improvements identified to date such as remodelling the M60 junctions at 12,13 & 14, linking the M62 to the A57 and capacity improvements between 9 and 10.

We will also consider other locations for improvements that will provide benefits on the M60 between Junctions 8 to 18 but a bypass between junctions 12 and 18 of the M60 will not be considered further.

Working closely with Transport for the North and Transport for Great Manchester, our study has so far supported the importance of the Simister Island Interchange in mitigating some impacts and there is now a [committed scheme in this location](#).

We have spoken with councils, key stakeholders, local business and groups to help assess local considerations and ensure we have built an accurate understanding of all benefits and constraints and we will continue to speak to them throughout the extended stage.

Using the information we have already gathered, we are looking at ways to reduce congestion and future proof the road by considering the benefits and potential impacts on motorists, the environment, our

neighbours and the economy. We'll then identify a shortlist of options we believe will tackle the issues, before consulting with the public.

The project is still in the very early stages and at this point there is no commitment from the Department of Transport to continue or to build if the options we identify don't solve the current problems or offer value for money.

Figure A2.23 Update on the North West Quadrant Study, National Highways Extracted from National Highways website on 12/2/2022 <https://nationalhighways.co.uk/our-work/north-west/manchester-north-west-quadrant/#overview>

Environmental Considerations

Other Environmental Constraints

Flood Zone / Risk;

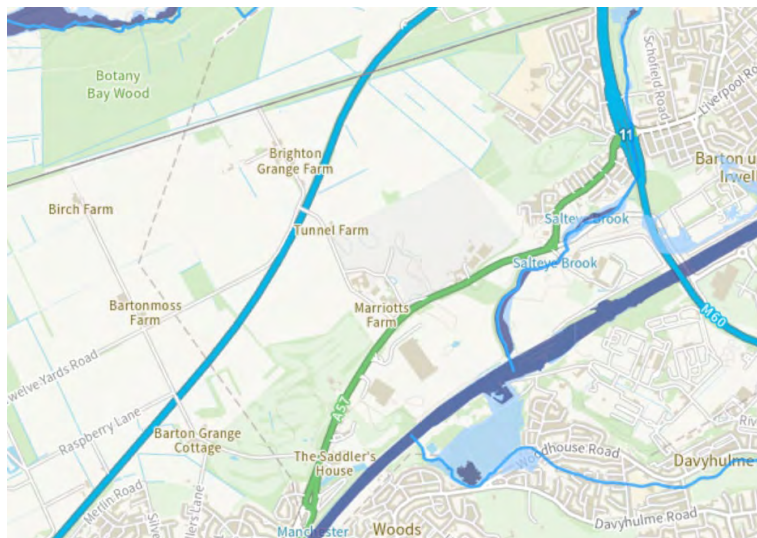


Figure A2.24 Extract EA Flood Map for Planning EA



Maximum extent of flooding from reservoirs:

● when river levels are normal
 / when there is also flooding from rivers

Figure A2.25 Flood Risk from Reservoirs Extract Source: <https://check-long-term-flood-risk.service.gov.uk/map>

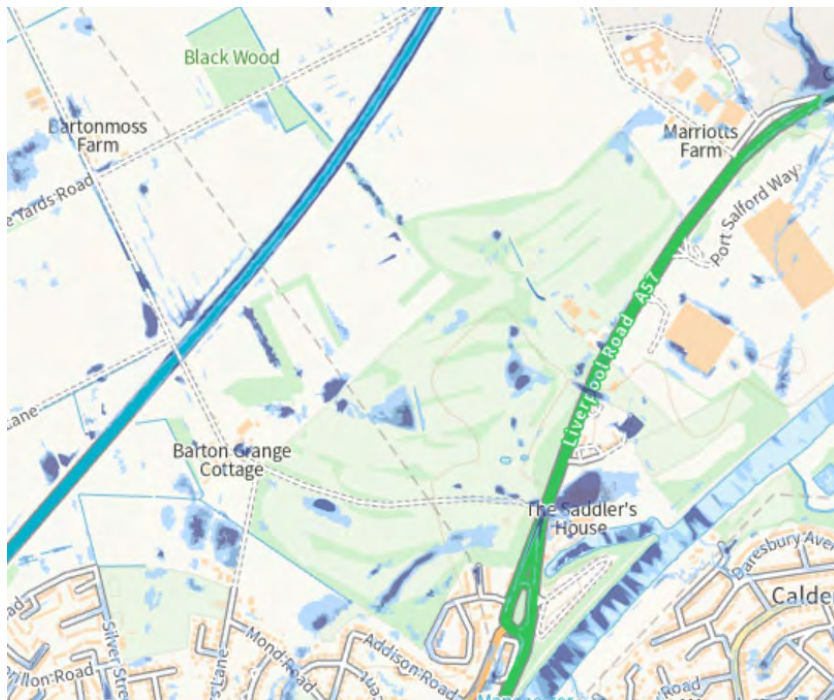


Figure A2.25a Extent of Surface Water Flooding Source: <https://check-long-term-flood-risk.service.gov.uk/map>

Ecology and Bio-diversity;

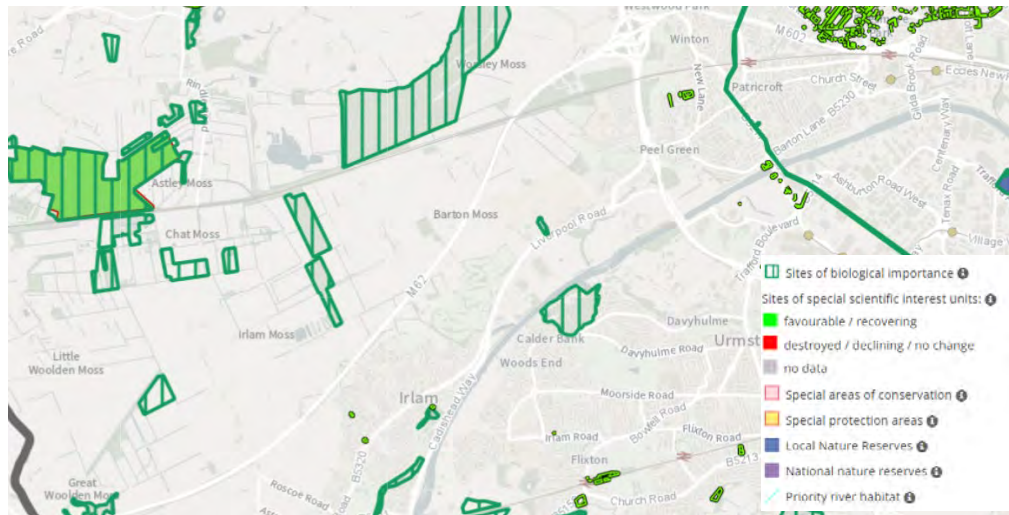


Figure A2.26 Extract Mapping GM – Sites of Biological Importance, and SAC's SSSI's

Ground conditions;

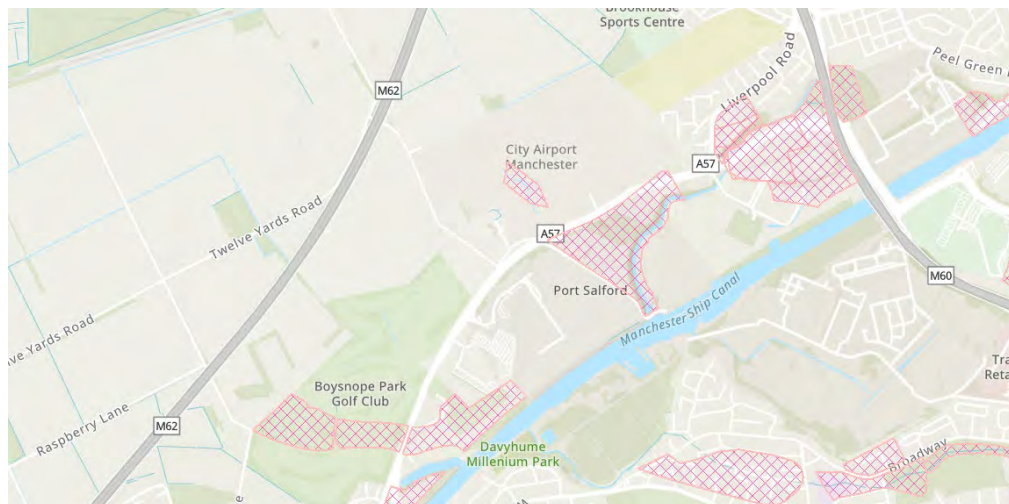


Figure A2.27 Historic Landfill Sites, ArgGIS Map viewer

Existing infrastructure;

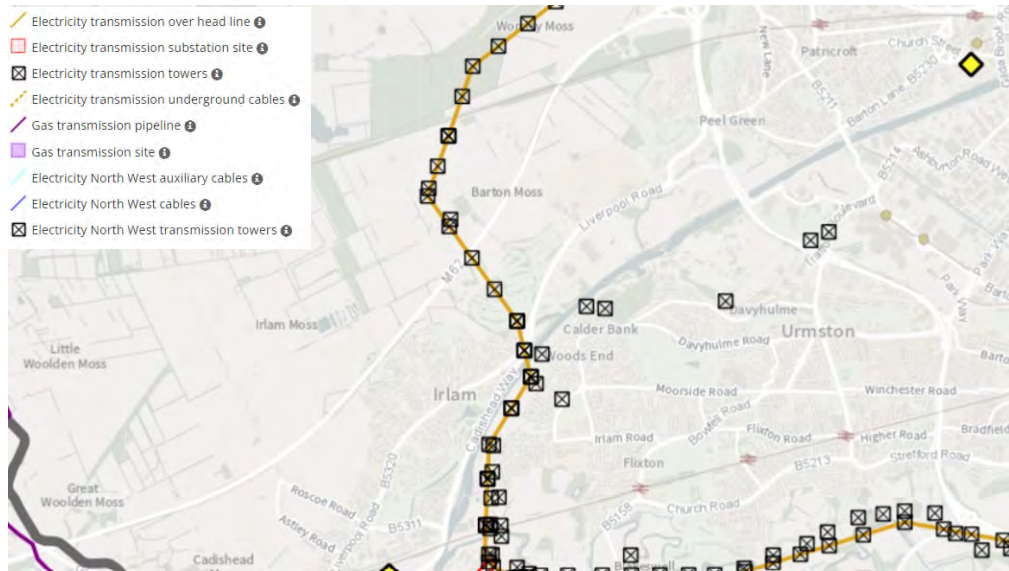


Figure A2.28 Existing Overhead Pipelines and Pylons, COMAH Sites, Transmission Pipelines Extract Mapping GM

Agricultural land grade

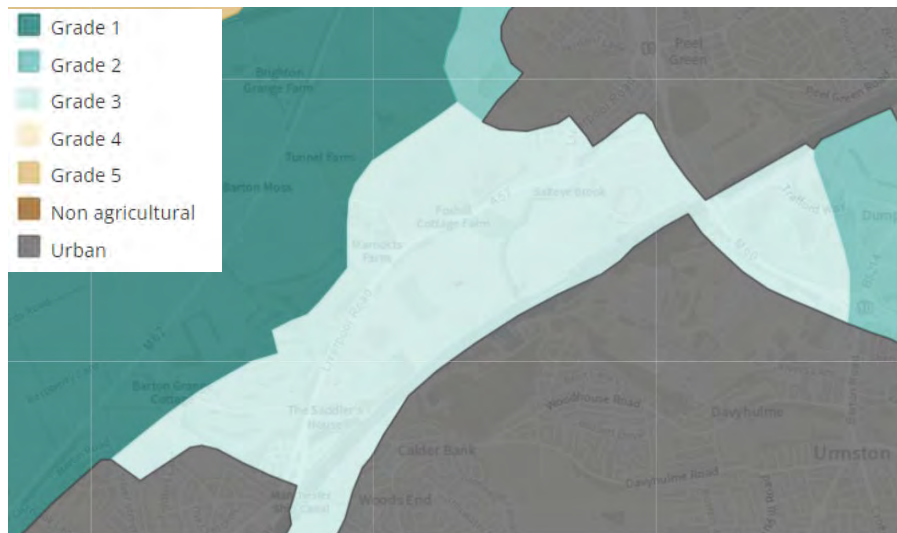


Figure A2.29 Agricultural Land Classification Extract Mapping GM

Appendix 3 – Site 8, Junction 21 of the M6

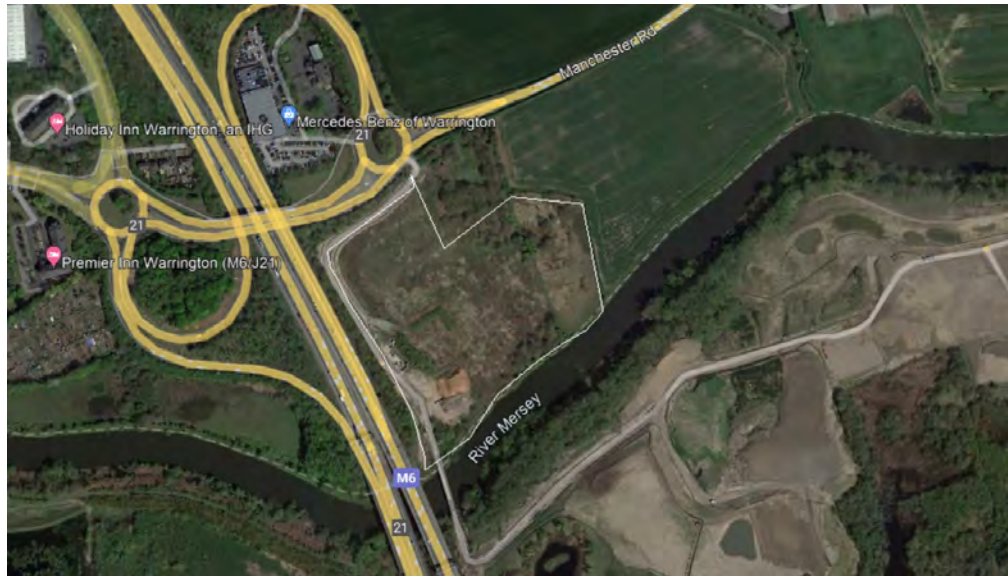


Figure A3.1 Site Location.

Planning Criteria

Green Belt Status

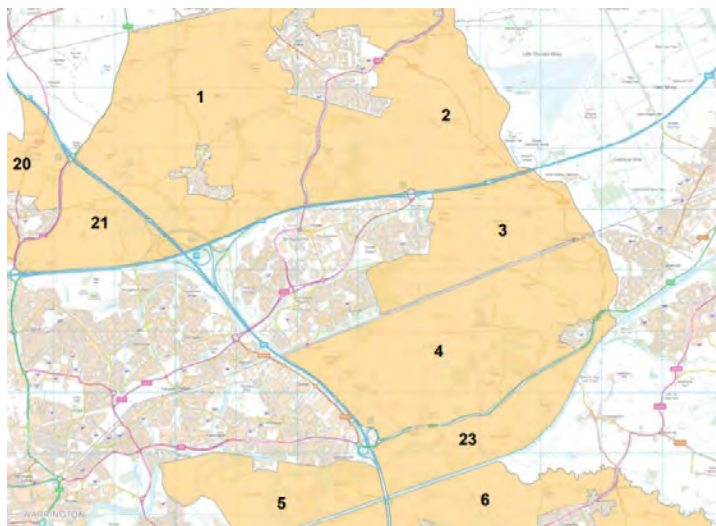


Figure A3.2 Extract Appendix E General Areas, Warrington Green Belt Assessment Final Report, October 2016

Reference (Map GA2)	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
23	Weak contribution: The GA has a limited connection to the built-up areas to the west. The durable boundary of the junction of the A57 and M6 would prevent sprawl into this location. Overall the GA makes a weak contribution to checking unrestricted sprawl.	Strong contribution: The GA forms an essential gap between the Warrington urban area and Cadishead in the adjacent neighbouring authority of St. Helens, where by development of the GA would result in the actual merging of the two towns. Limited development in the western section of the GA would not result in the merging of towns. Overall the GA makes a strong contribution to preventing towns from merging.	Strong contribution: The M6, A57 and the Liverpool Manchester railway line form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA was developed. In addition, the junction of the M6 and the A57 in the GA's north-western corner form a durable boundary between the GA and the Warrington urban area. The A57 forms a durable boundary between the GA and the investment area of Hollins Green in the GA's northern corner and the Glazebrook river forms a durable boundary between the GA and Cadishead in the GA's north-eastern which would prevent encroachment. The GA is well connected to the open countryside along the river boundaries. The GA supports a strong level of openness given that less than 10% built form and only moderate levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	No contribution: Warrington is a historic town whose setting is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	The GA makes a strong contribution to its purpose, a moderate contribution to one, a weak contribution to one and no contribution to one. The GA has therefore been judged to make a strong overall contribution to the Green Belt. While the GA has a limited connection to the urban area and the A57 and M6 would prevent sprawl, development of the GA would lead to the merging of the Warrington urban area and Cadishead. In addition, the GA is well connected to the countryside and supports a strong degree of openness.	Strong contribution

Figure A3.3 Extract Appendix E Warrington Green Belt Assessment Final Report October 2016



Figure A3.4 Extract Appendix F, Parcel Maps Warrington Green Belt Assessment, Final Report October 2016

WR24	Weak contribution: The M6 and A57 forms a durable boundary between the parcel and the built-up areas to the west. The junction of the A57 and M6 would prevent sprawl into this location. Overall the parcel makes a weak contribution to checking unrestricted sprawl.	Weak contribution: The parcel forms an essential gap between the Warrington urban area and St. Helens, where by development of the parcel would slightly reduce the gap between the two towns but would not result in the merging. Overall the parcel makes a weak contribution to preventing towns from merging.	Strong contribution: The boundary between the parcel and the built-up areas to the west is a durable boundary consisting of the M6 and the A57. The boundaries between the parcel and the durable countryside to the east are also durable. The parcel is well connected to the countryside along the river boundaries. The parcel is flat with no built form and limited vegetation. The parcel supports a strong level of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment due to its openness and the durable eastern boundary with the countryside.	No contribution: Warrington is a historic town whose setting is not within 250m of any of the Town Centre Conservation Areas. The parcel does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	The parcel makes a strong contribution to its purpose, a moderate contribution to one, a weak contribution to two, and no contribution to one. In line with the methodology, professional judgement has been used to assess the overall contribution. The parcel has been judged to make a moderate overall contribution to the Green Belt. The remaining boundary with the countryside is durable, therefore the parcel makes a moderate contribution to this purpose. Any development would be contained and would not result in the merging of the Warrington urban area and Cadishead. The parcel makes a weak contribution to checking unrestricted sprawl and preventing towns from merging.	Moderate contribution
-------------	---	---	---	--	--	--	-----------------------

Figure A3.5 Extract Appendix G, Table G1, Parcel Assessment Parcel WR 24, Warrington Green Belt Assessment, Final Report, October 2016

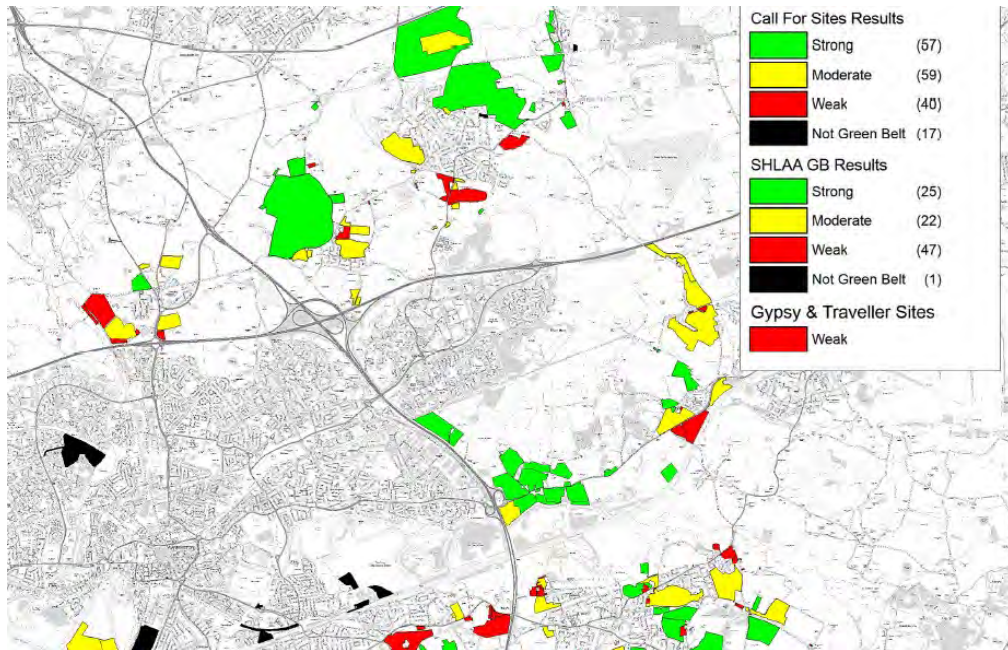


Figure A3.6 Extract Parcel/Site Location and Overall Assessment: Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) July 2017

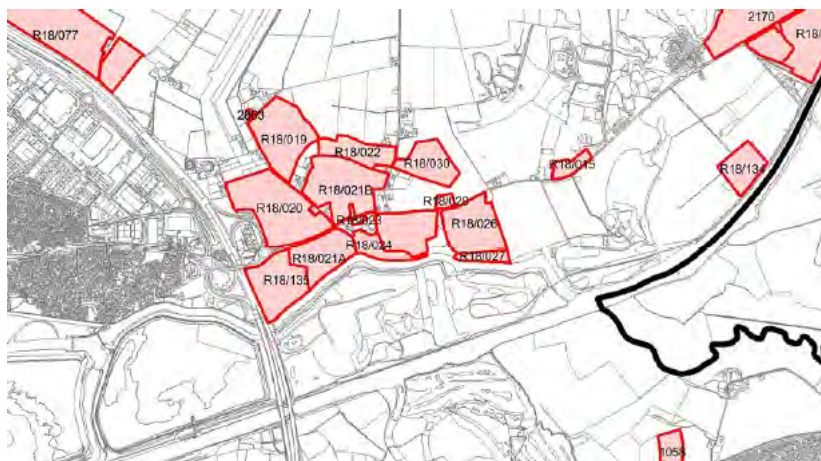


Figure A3.7 Extract Parcel/Site Location Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) July 2017

Reference	Purpose 1: to check the unrestricted sprawl of large built-up areas.	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns.	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
RI10135	Weak contribution. The M6 and A57 form a durable boundary between the site and the built up area which could prevent sprawl into the site. The site has a limited connection to the built up area along its western boundary. Given the shape of the built-up area, development of the site would not round of the settlement pattern. Overall the site makes a weak contribution to checking unrestricted sprawl.	Weak contribution. The site forms a less essential gap between the Warrington urban area and Lynton whereby development of the site would slightly reduce the gap between the towns but would not result in them merging. Overall the site makes a weak contribution to preventing towns from merging.	Strong contribution. The boundary between the site and the built up area is durable consisting of the M6 to the west and a small section of the A57 to the south. These are able to prevent encroachment into the site. The boundaries between the site and the countryside are of mixed durability. The River Mersey forms a durable boundary to the south, the A57 forms a durable boundary to the north, and an unmarked field boundary forms a non-durable boundary to the east. This eastern boundary would not be able to prevent encroachment beyond the site if it were developed. The site is connected to the countryside along two boundaries and feels disconnected from the Warrington urban area to the west as it is across the motorway. The existing land use consists of open countryside that is predominantly in agricultural use. The site is flat with no built form or vegetation. There are open long line views thus the site supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment due to its openness and the non-durable eastern boundary with the countryside.	No contribution. Warrington is a historic town however the site is not within 250m of the Warrington Town Centre Conservation Area. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution. The Mid Mersey Housing Market Area has a 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to two, and no contribution to one. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution as although it supports a strong degree of openness and the eastern boundary with the countryside is not durable, the remaining boundaries are durable and consist of strong boundaries (M6, A57 and River Mersey) which could prevent encroachment from the settlement or contain development so it would not threaten the overall openness and permanence of the Green Belt. The site makes a weak contribution to checking unrestricted sprawl and preventing towns from merging.	Moderate contribution

Figure A3.8 Parcel/Site Assessment: Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) July 2017

b) & c) Green Belt Issues & Residential Amenity

8. The Secretary of State accepts the Inspector's conclusions, in particular that the proposals at both Junctions 21 & 22 represent inappropriate development in the Green Belt [IR7.9] and that all the schemes would seriously damage the openness of the Green Belt and its visual amenity [IR17.2]. The Secretary of State also agrees with the Inspector's conclusion that there would be some risk of noise affecting the occupants of dwellings near to the Junction 22 MSA [IR17.4].

- 17.2 The application sites all lie within the Green Belt. The various proposals represent inappropriate development and are, by definition, harmful to the Green Belt. All schemes would seriously damage the openness of the Green Belt and its visual amenities. They would cause different, but equivalent, intense harm to the Green Belt and to the countryside which should be safeguarded for its own sake. This is particularly the case when the potential attractiveness of the Junction 21 land is envisaged. Whilst I do not entirely agree that the Junction 21 proposal would appear to be suitable in landscape terms, the fact that it is *enclosed on two sides by the embankments of the M6 and realigned A57* does give it a slight advantage in this respect over the Junction 22 application sites.

Figure A3.9 Extract from APP/Mo655/V.00/000199&200 Proposed MSA at J21 of the M6 application and appeal by Swayfields, Proposed MSA at J22 of the M6, Secretary of State Decision and Inspectors Report. 25th July 2002

Planning Policy Position.

Adopted Development Plan



Figure A3.10 Extract Adopted Local Plan Core Strategy 2014, Source Mapping Warrington

Emerging Local Plan, Publication Version

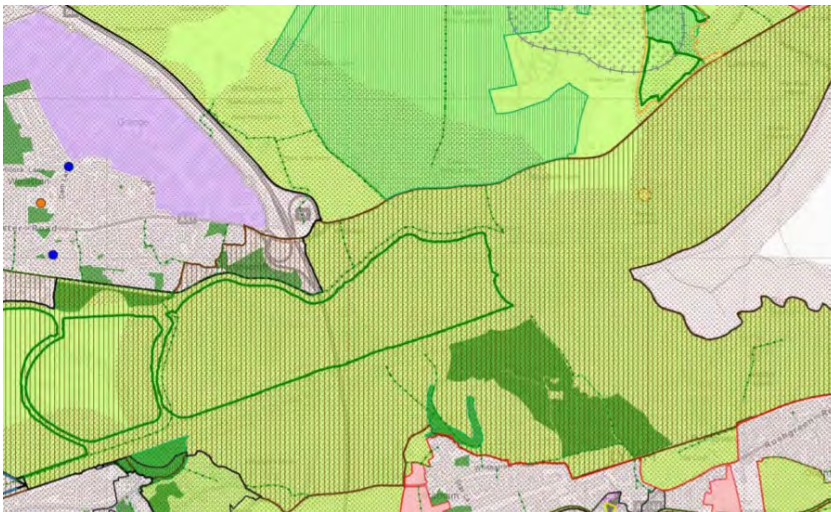



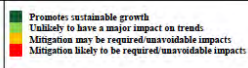


Figure A3.1 | Warrington Local Plan Proposed Submission Version 2021

Site Assessments for Emerging Plan

Subject Employment Proformas – Site Selection
[Click here to enter text.](#)

Site Ref: R18/135

Site Name Sturham Meadows Site Address: Sturham Meadows, adjacent to M66 motorway Ward Flinton & Woolston Existing Use Construction landfill site Gross Site Area (Ha) 12.80 Net: Developable Site Area (Ha) Site Potential (capacity) Mixed use Green Belt Assessment General Area Assessment Parcel Reference: 23 General Area Assessment Parcel Result: Strong Green Belt Parcel Reference: R18/135 Green Belt Parcel Result: Moderate					
Suitability		Availability		Achievability	
Criteria 		Key Questions: 1. Was the site promoted by the owner? 2. Is there an extant planning consent on the site? 3. Is the site in active use?	Assessment Yes No Yes	Key Questions: 1. Based on the high level viability review, is the site in a location of high, moderate or low viability? 2. Is there active developer interest in the site? 3. Is there known demand for the form of provision approved proposed?	Assessment Moderate viability Yes, owner is developer. Yes
Would site development lead to the loss of employment land? 	Employment land proposed.				
Distance to Principal Road Network by vehicle? 	Within 1 Mile of Principal Road Network.				
Is there a physical point of highway access into the site? 	Yes, off roundabout from A57.				
How close is the site to key employment sites? 	Approx. 155m from Jumper Lane Martinscroft.				
Is the area supported by community facilities? (Village)	N/A				

Subject Employment Proformas – Site Selection
[Click here to enter text.](#)

halls, places of worship, community centres)? Does the site provide access to formal play space? How accessible is the site to the nearest primary school on foot? How accessible is the site to the nearest Secondary school? How well served is the site by a bus service? How accessible is the site to the nearest train station? What is the overall distance to a GP service or health centre? What are the potential impacts on air quality? Could development of the site lead to the remediation of land potentially affected by contamination? Would allocation of the site result in the loss of High Quality Agricultural Land? Does the site fall within a Groundwater Source Protection Zone, as identified by the Environment Agency? Is the site (or part of) within an identified flood zone? Is there potential for safeguarded or identified mineral reserves to be identified? What is the proximity of the site to designated heritage assets? What effects would the development of the site have upon the significance and setting of heritage assets / the historic environment?	N/A N/A N/A Within 200m of bus stop. Within 5km of Burchwood Station. N/A Site is within an AQMA. Potentially contaminated land. Grade 2 agricultural land. Site within a Groundwater Source Protection Zone 3. Site within flood zone 2 and 3. Site is within a Sand and Gravel MSA. Approx. 399m away from Milestone. Development could be managed so as to not impact upon the setting of heritage assets.	4. Could the site be developed now? 5. Is the site free of ownership and tenancy issues? Summary: Is the site available for development? (conclusion based on all of the above) Site being promoted by the developer owner with no known ownership issues, site could be available in 5 years because remediation is required.	No, could be available in 5 years. Yes	4. Have similar sites been successfully developed in the preceding years? 5. Are there known abnormal development costs? Summary: Is the site achievable for development? (conclusion based on all of the above) The site is in a location of moderate viability. There is developer interest and/or demand and potential abnormal development costs. EDNA site Grade 'D'.	Yes Yes, part of land is potentially contaminated.
--	--	---	---	--	---

Capacity of the landscape to accommodate development while respecting its character.	Class 1 Unsheltered Enclosed Farmland.		
Could allocation of the site have a potential impact on a European Site SPA or SAC?	Yes, Rixton Clay Pits SAC.		
Could allocation of the site have a potential impact on a SSSI?	Yes, Woolston Eyes SSSI.		
Could allocation of the site have a potential adverse impact on designated Local Wildlife Sites, Local Nature Reserves, RIGs, Potential Wildlife Sites or any other site of wildlife or geodiversity value such as Ancient Woodland (including where BAP species and habitats have been recorded)?	Yes, BAP Wetlands and Grassland Habitat and Woodland and Orchard Habitat.		
What is the potential impact on TPOs?	None.		
Would allocation of the site result in the use of previously developed land?	Site is greenfield.		
<p>Summary: Is the site suitable for development? (conclusion based on all of the above including any comments from site visit)</p> <p>Suitability: Mixed Assessment - A mitigation measures may be required with some unavoidable impacts.</p> <p>Site visit: The site is relatively flat agricultural land with some undulating topography across the site, some mature hedge coverage with Statham Lane track off the main A57 Manchester Road running through the site. There is also an existing service track access into the site off the A57/M6 Motorway roundabout.</p> <p>The northern boundary of the site is with the A57 Manchester Road, the eastern boundary is with open agricultural land; the southern boundary is with a Public Right of Way and the River Mersey, and the western boundary is with the M6 Motorway. The site is within the 500m SSSI Buffer for Woolston Eyes SSSI, within Flood zones 2 & 3, with part of the western site being within the M6 Motorway AQMA Buffer Zone.</p> <p>The assessment of the site in Green Belt terms concluded that the parcel of land makes a moderate contribution. The land is also identified as being potentially contaminated land and this would therefore require further investigation.</p> <p>Economic Development Needs Assessment Conclusions: The site is graded 'D' in the context of the Council's EDNA (2019) and therefore performs poorly in terms of its contribution to</p>		<p>Overall Site Conclusion: based on Suitability, Availability, Achievability The site is graded 'D' in the context of the Council's EDNA (2019) and therefore performs poorly in terms of its contribution to meeting Warrington's employment land needs.</p> <p>The site is likely to require mitigation measures and have some unavoidable impacts.</p> <p>The site is available and is being promoted through the Local Plan process.</p> <p>Development of the site is less likely to be achievable given the EDNA Grade 'D' rating.</p> <p>This site and the wider site perform poorly against the Local Plan Objectives for the Borough.</p> <p>SITE CONCLUSION: Taking into account and balancing a range of factors, this site and the wider site is <i>not selected</i> as a suitable site to meet the Council's economic development needs.</p>	
<p>meeting Warrington's employment land needs.</p> <p>Local Plan Objective: The low EDNA Grade limits any positive contribution the site can make to providing employment land to meet Warrington's future needs in accordance with Objective W1. The site is unlikely to contribute to wider infrastructure improvements to support the regeneration of inner Warrington and the growth of the Borough as a whole in accordance with the wider aims of Objective W1 and Objective W4. The site could form part of a wider urban extension to the east of Warrington, but this is not considered a reasonable option given the significant environmental constraints and is therefore not being taken forward in the draft Local Plan.</p> <p>This site has also been submitted in January 2019 for a mix of B class uses as part of a wider site reference R18/P2/143. Site R18/P2/143 includes the following sites; R18/020, R18/135 (part), R18/021A, R18/024 and R18/025.</p> <p>Whilst the scale of development proposed in the wider site could potentially result in a greater contribution towards infrastructure improvements, the sites separation from the main urban area would limit the contribution this infrastructure would make to support the regeneration of inner Warrington and the growth of the Borough as a whole in accordance with Objectives W1 and W4. It would also result in a large area of Green Belt that makes a strong contribution to Green Belt purposes, contrary to Objective W2.</p>			

Figure A3.12 Extract Warrington Borough Council Proposed Submission Version Local Plan Site Assessment Proformas, 2019, pages 159 -162.

Site Promotion

Statham Meadows

- 10.5 Peel continues to promote a site at Statham Meadows for employment uses and / or as a Motorway Service Area (MSA) given its proximity to Junction 21 of the M6 motorway.

The site extends to c. 13 ha and has a frontage to the A57; a key route connecting Manchester and Warrington which would give the site significant advantages in accommodating logistics or manufacturing uses and / or lend itself to a MSA, ensuring users of these busy stretches of strategic road have access to good quality welfare and break facilities as critical to the safe operation of the road network.

- 10.6 Indeed, the Secretary of State for Transport has previously confirmed (in July 2002) that an MSA at Statham Meadows (Junction 21) would have advantages over a potential MSA at Junction 22 given the advantage of the Junction 21 proposals to serve the needs of both long and short distance travel⁶.
- 10.7 Whilst both schemes were ultimately refused due to a lack of evidenced need at that time, national policy relating to the provision and spacing of MSAs has changed significantly since that time.
- 10.8 Peel is aware of emerging proposals by the Extra MSA Group to submit an outline planning application for a new MSA at Junction 11 of the M62, to the north east of Warrington. The pre-application information published to date⁷ indicates that there is considered to be sufficient demand for further MSA provision on this part of the network.
- 10.9 The existing motorway junction adjacent to Statham Meadows comprises 'dumb-bell' roundabouts located to the east and west of the mainline of the M6 motorway. Both roundabouts connect with the A57 Manchester Road with a two-lane dual carriageway connecting the two. Access to the site can be taken from an improved entry to the eastern roundabout with consequential amendments to the westbound A57 approach. Footway connections can also be provided.
- 10.10 In highways and transport terms, the site can be accessed satisfactorily and safely, residual traffic impacts will not be severe and the site will be sustainable and accessible.
- 10.11 In the context of an evidenced need, the site would be a suitable allocation for MSA and / or for employment development and should be considered as such through the Local Plan.

Figure A3.13 Extract Paper I Overview Representations to the Warrington Proposed Submission Version Local Plan, Peel Holdings June, 2019

9. Statham Meadows

- 9.1 Peel has historically promoted a site at Statham Meadows which is suitable for employment uses and / or as a Motorway Service Area (MSA) given its proximity to Junction 21 of the M6 motorway.
- 9.2 The site extends to approximately 13 ha, located adjacent to Junction 21 of the M6. The site has a frontage to the A57, which is a key route connecting Manchester and Warrington. This gives the site significant advantages in accommodating logistics or manufacturing uses and market demand would be high. Critically, given the site's infrastructure connections, vehicles serving the site would utilise the strategic road network and would not need to use local or residential roads.
- 9.3 The site is capable of accommodating approximately 43,000 sq m of floor space, which would equate to two B2 / B8 units of approximately 200,000 sq ft each or four units of approximately 100,000 sq ft each. This would represent a small intrusion in to the Green Belt though the site is well contained by existing defensible features, including the River Mersey to the south and the A57 to the north ensuring the Green Belt in this area can endure over the long term.
- 9.4 This site also has the potential to be used for motorway services or roadside retail purposes, or part of a mix of uses alongside some employment development. The site's location on the M6 and A57 would lend itself to such uses; ensuring users of these busy stretches of strategic road have access to good quality welfare and break facilities as critical to the safe operation of the road network.
- 9.5 The principle of developing an MSA at Junction 21 of the M6 has previously been considered by the Secretary of State²², alongside proposals for an MSA at Junction 22 of the M6. Planning applications for both schemes were 'called in', and the Secretary of State's decision was issued in July 2002²³.
- 9.6 Whilst both schemes were ultimately refused due to a lack of evidenced need at that time to outweigh the conflict with the development plan and 'inappropriate' development in the Green Belt, national policy relating to the provision and spacing of MSAs has changed significantly since that time. Current guidance²⁴ now confirms that:
- In order to provide opportunities to stop at intervals of approximately half an hour, the Highways Agency recommends that the maximum distance between MSAs should be no more than 28 miles.
 - The distance between services can be shorter (particularly on congested parts of the network where travel between service areas may take longer), as long as the access / egress arrangements comply with technical standards in respect of junction separation.

²² Secretary of State for Transport, Local Government and the Regions

²³ PINS ref. APP/M0655/V/00/000199 and 200

²⁴ Annex B: Roadside facilities for road users on motorways and all-purpose trunk roads in England, Circular 02/2013 (Department for Transport, September 2013)

-
- In determining applications for new sites, local planning authorities should not need to consider the merits of spacing of sites beyond conformity with the maximum and minimum spacing criteria established for safety reasons. Nor should they seek to prevent competition between operators; rather they should determine applications on their specific planning merits.
 - It is for the private sector to promote and operate service areas that meet the needs of the travelling public.
- 9.7 Peel is aware of emerging proposals by the Extra MSA Group to submit an outline planning application for a new MSA at Junction 11 of the M62, to the north east of Warrington. The pre-application information published to date²⁵ indicates that there is considered to be sufficient demand for further MSA provision on this part of the network.
- 9.8 Notwithstanding that the previous proposals were refused, the Inspector's recommendation to the Secretary of State provides a number of helpful indications in relation to the Statham Meadows (Junction 21) opportunity. In particular, the Inspector concluded that:
- "Should the Secretary of State... consider that a new MSA should be provided on the M6 motorway between Knutsford and Charnock Richard MSAs, I consider that notwithstanding the better access at Junction 22 and my preference for the Direct Option, the very slight net advantage of the Junction 21 site points to a MSA on that land."*²⁶
- 9.9 The advantage referred to related to the potential for an MSA at Junction 21 to serve the needs of both long and short distance travel²⁷.

Highways and Access

- 9.10 The existing motorway junction adjacent to the site (M6 Junction 21) comprises 'dumb-bell' roundabouts located to the east and west of the mainline of the M6 motorway. Both roundabouts connect with the A57 Manchester Road with a two-lane dual carriageway connecting the two.
- 9.11 Access to the Statham Meadows site can be taken from an improved entry to the eastern roundabout with consequential amendments to the westbound A57 approach. Footway connections can also be provided. At the appropriate time, the access proposals will be subject to road safety audit but, at this stage, it is considered that safe and satisfactory access can be provided to the site.
- 9.12 As noted within Peel's representations to the PDO, the impacts of the traffic flows generated by employment and roadside services uses has been assessed at the two

²⁵ <https://www.warringtonservices.co.uk/>

²⁶ Paragraph 17.13, Inspector's Report to the Secretary of State for Transport, Local Government and the Regions (19 April 2002)

²⁷ Paragraph 17.9, Inspector's Report to the Secretary of State for Transport, Local Government and the Regions (19 April 2002)

roundabouts at M6 Junction 21. Whilst both options increase queue lengths, it is concluded that the residual traffic impacts of the proposals are acceptable.

- 9.13 Traffic is also distributed in various directions from the junction and is therefore spread around the surrounding highway network. The impacts of this can be assessed in full as the proposals are progressed but, given the scale of total traffic generations and that the flows are spread across several roads, then off-site traffic impacts, away from M6 Junction 21, will not be severe.
- 9.14 In terms of sustainability, footways will be provided from the site to connect with existing facilities. The strategic cycle route 2 (Woolston to town centre) runs from Manchester Road west of M6 Junction 21 to the town centre via lightly trafficked streets and cycle paths. Bus route 100 runs along the site frontage, providing an hourly frequency service to Warrington Interchange, Hollins Green, Cadishead, Irlam, the Trafford Centre, Eccles, Salford and Manchester. The 3/3E bus route runs from Woolston Grange Avenue to Warrington Interchange with bus stops c. 500m from the site on Manchester Road. It provides a 30 minute frequency daytime service (20 minutes' weekday peak hours) with hourly evening services. The site is therefore accessible by sustainable travel modes.
- 9.15 Overall, it is therefore concluded in highways and transport terms, that the site can be accessed satisfactorily and safely, residual traffic impacts will not be severe and the site will be sustainable and accessible.

Figure A3.14 Extract Paper 5: Other Matters, Representations to the Warrington Proposed Submission Version Local Plan, Peel Holdings, June 2019

<ul style="list-style-type: none"> Continue to promote a site at Statham Meadows for employment uses and / or as a Motorway Service Area (MSA) given its proximity to Junction 21 of the M6 motorway. In the context of an evidenced need, the site would be a suitable allocation for MSA and / or for employment development. 	<ul style="list-style-type: none"> The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. There is no requirement for the Plan to allocate land for a Motorway Service Area.
---	--

Figure A3.15 Extract: Responding to Representations Report, 2021, Policy DEV 4 Development and Economic Growth

Impact on Heritage Assets

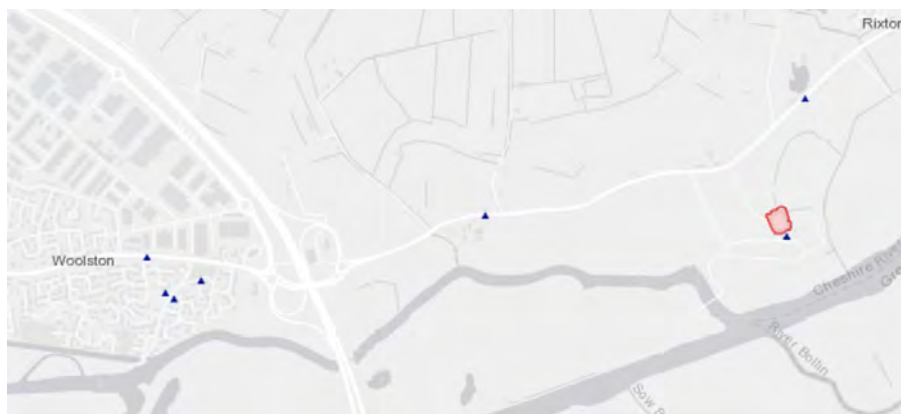


Figure 3.16 Listed Buildings, Structures and Scheduled Monuments. Source: Historic England <https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

Relevant Planning History –

b) & c) Green Belt Issues & Residential Amenity

8. The Secretary of State accepts the Inspector's conclusions, in particular that the proposals at both Junctions 21 & 22 represent inappropriate development in the Green Belt [IR7.9] and that all the schemes would seriously damage the openness of the Green Belt and its visual amenity [IR17.2]. The Secretary of State also agrees with the Inspector's conclusion that there would be some risk of noise affecting the occupants of dwellings near to the Junction 22 MSA [IR17.4].

h) Traffic movement and highway safety.

22. The Secretary of State agrees with the Inspector's conclusions that the proposed junctions to provide access to the MSA at Junction 21 would operate satisfactorily [IR13.76], and that internal circulation would be safe [IR13.79]. He also agrees that the access would be inconvenient for northbound traffic and for the occupants of dwellings on the cul-de-sac that is part of Old Manchester Road and this tells against the Junction 21 proposal [IR13.84].
- 13.80 So far so good in terms of geometric design and physical capacity. But Government policy set out in the 1998 statement is that MSA schemes should incorporate vehicle access and means of circulation which are safe, clear to motorists and minimise vehicle congestion. In my judgement the proposed access to the Junction 21 site would be thoroughly inconvenient. Northbound traffic approaching it on the M6 Motorway would have to pass through 2 complex junctions. Between the western junction and the entrance to the MSA it would meet a considerable amount of local traffic at peak times. (13.30 & 13.44)
- 13.81 Whilst there might not usually be any serious congestion or intense risk of danger, I consider that the inconvenience expected would often persuade drivers not to use the services. The potential of the MSA to contribute towards safer Motorways could thus be somewhat thwarted, and this is a strong argument against the use of this land for the proposed purpose. But with no better alternative site, I accept that the MSA would provide an opportunity for the tired driver to stop and rest.
- 13.82 I am far from satisfied about the proposed arrangements for the residents of the 7 dwellings on the cul-de-sac that is part of the Old Manchester Road. I accept that present arrangements for emerging from this road to turn right along Woolston Grange Avenue are far from ideal, but I think it an imposition to expect these people to circumnavigate 2 junctions, mixing with local and MSA traffic, to head north along Woolston Grange Avenue. This is another aspect of substantial inconvenience. (13.17 & 13.26)
- 13.84 I rely a good deal on the advice of the Highways Agency. Essentially, I accept that the highway improvements are suitable in principle and that sufficient physical capacity for the additional traffic should be available for some time up to 2016. Much, of course, will depend upon any general increase in traffic both nationally and locally. But the inconvenience of access to the MSA, especially for northbound traffic, is a very serious disadvantage and tells against the proposal. (13.51)

- 17.2 The application sites all lie within the Green Belt. The various proposals represent inappropriate development and are, by definition, harmful to the Green Belt. All schemes would seriously damage the openness of the Green Belt and its visual amenities. They would cause different, but equivalent, intense harm to the Green Belt and to the countryside which should be safeguarded for its own sake. This is particularly the case when the potential attractiveness of the Junction 21 land is envisaged. Whilst I do not entirely agree that the Junction 21 proposal would appear to be suitable in landscape terms, the fact that it is *enclosed on two sides by the embankments of the M6 and realigned A57* does give it a slight advantage in this respect over the Junction 22 application sites.
- 17.8 In terms of physical suitability and traffic movement, the Junction 21 proposal leaves much to be desired. There would be a considerable amount of inconvenience but not necessarily danger. At Junction 22, the sub-standard weaving distance is a concern but there would be an overall benefit.

Figure A3.17 Extract from APP/Mo655/V.00/000199&200 Proposed MSA at J21 of the M6 application and appeal by Swayfields, Proposed MSA at J22 of the M6, Secretary of State Decision and Inspectors Report. 25th July 2002

Engineering, Safety and Operational Issues

Highways Engineering / The ability of a site to provide safe access

h) Traffic movement and highway safety.

22. The Secretary of State agrees with the Inspector's conclusions that the proposed junctions to provide access to the MSA at Junction 21 would operate satisfactorily [IR13.76], and that internal circulation would be safe [IR13.79]. He also agrees that the access would be inconvenient for northbound traffic and for the occupants of dwellings on the cul-de-sac that is part of Old Manchester Road and this tells against the Junction 21 proposal [IR13.84].

- 13.80 So far so good in terms of geometric design and physical capacity. But Government policy set out in the 1998 statement is that MSA schemes should incorporate vehicle access and means of circulation which are safe, clear to motorists and minimise vehicle congestion. In my judgement the proposed access to the Junction 21 site would be thoroughly inconvenient. Northbound traffic approaching it on the M6 Motorway would have to pass through 2 complex junctions. Between the western junction and the entrance to the MSA it would meet a considerable amount of local traffic at peak times. (13.30 & 13.44)
- 13.81 Whilst there might not usually be any serious congestion or intense risk of danger, I consider that the inconvenience expected would often persuade drivers not to use the services. The potential of the MSA to contribute towards safer Motorways could thus be somewhat thwarted, and this is a strong argument against the use of this land for the proposed purpose. But with no better alternative site, I accept that the MSA would provide an opportunity for the tired driver to stop and rest.
- 13.82 I am far from satisfied about the proposed arrangements for the residents of the 7 dwellings on the cul-de-sac that is part of the Old Manchester Road. I accept that present arrangements for emerging from this road to turn right along Woolston Grange Avenue are far from ideal, but I think it an imposition to expect these people to circumnavigate 2 junctions, mixing with local and MSA traffic, to head north along Woolston Grange Avenue. This is another aspect of substantial inconvenience. (13.17 & 13.26)
- 13.84 I rely a good deal on the advice of the Highways Agency. Essentially, I accept that the highway improvements are suitable in principle and that sufficient physical capacity for the additional traffic should be available for some time up to 2016. Much, of course, will depend upon any general increase in traffic both nationally and locally. But the inconvenience of access to the MSA, especially for northbound traffic, is a very serious disadvantage and tells against the proposal. (13.51)
- 17.8 In terms of physical suitability and traffic movement, the Junction 21 proposal leaves much to be desired. There would be a considerable amount of inconvenience but not necessarily danger. At Junction 22, the sub-standard weaving distance is a concern but there would be an overall benefit.

Figure A3.18 Extract from APP/Mo655/V.00/000199&200 Proposed MSA at J21 of the M6 application and appeal by Swayfields, Proposed MSA at J22 of the M6, Secretary of State Decision and Inspectors Report. 25th July 2002

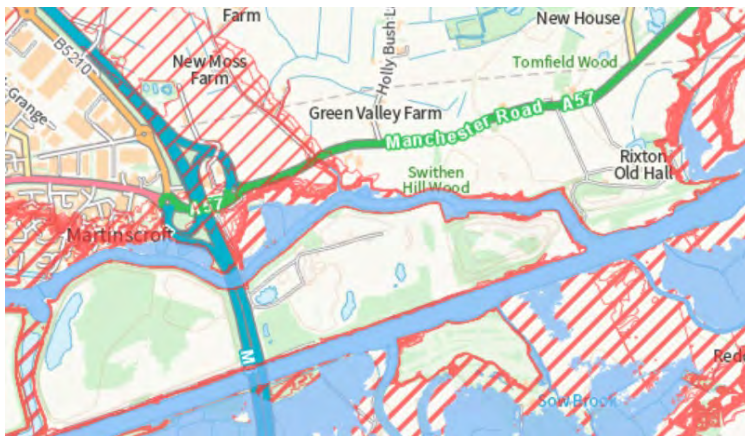
Environmental Considerations

Other Environmental Constraints

Flood Zone / Risk;



Figure A3.19 Extract: EA Flood Map for Flooding



Maximum extent of flooding from reservoirs:


 when river levels are normal  when there is also flooding from rivers

Figure A3.20 Flood Risk from Reservoirs Extract Source: <https://check-long-term-flood-risk.service.gov.uk/map>

Ecology and Bio-diversity;

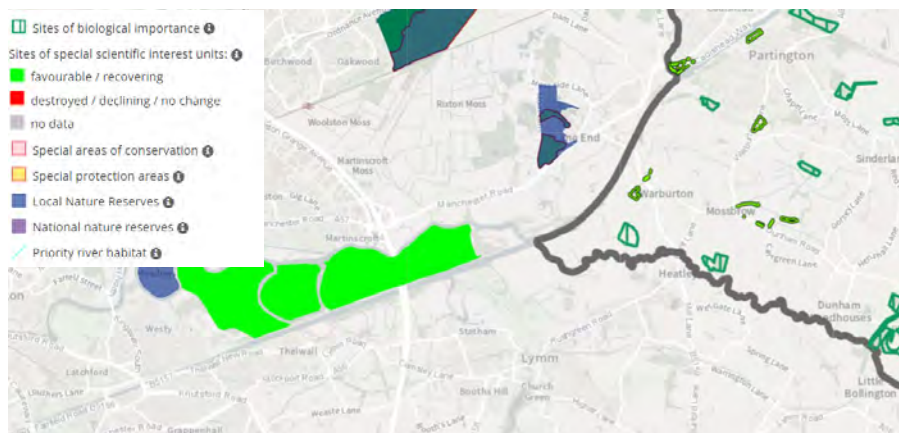


Figure A3.21 SSSI, Local Nature Reserves, Sites of Biological Importance, Extract Mapping GM

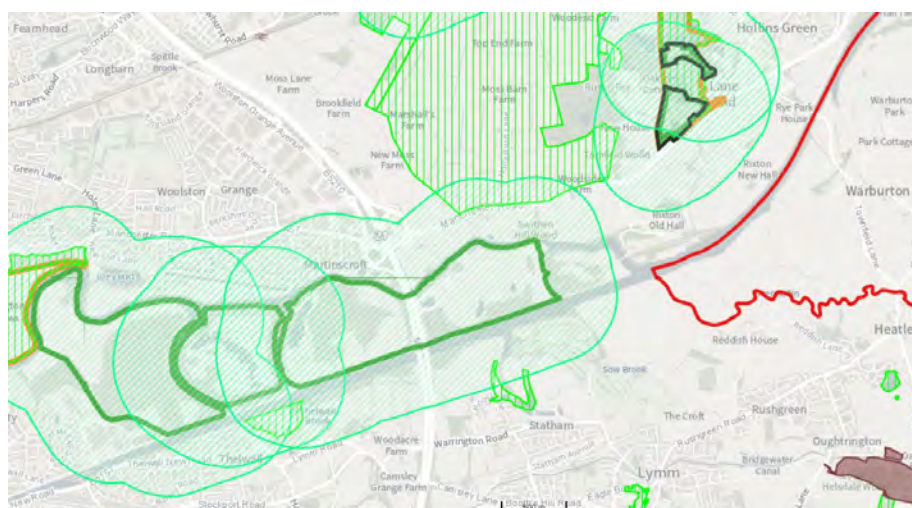


Figure A3.22 SSSI, SSSI Buffer, Local Nature Reserves, Local Wildlife Sites SAC's Extract Mapping Warrington

Ground conditions;

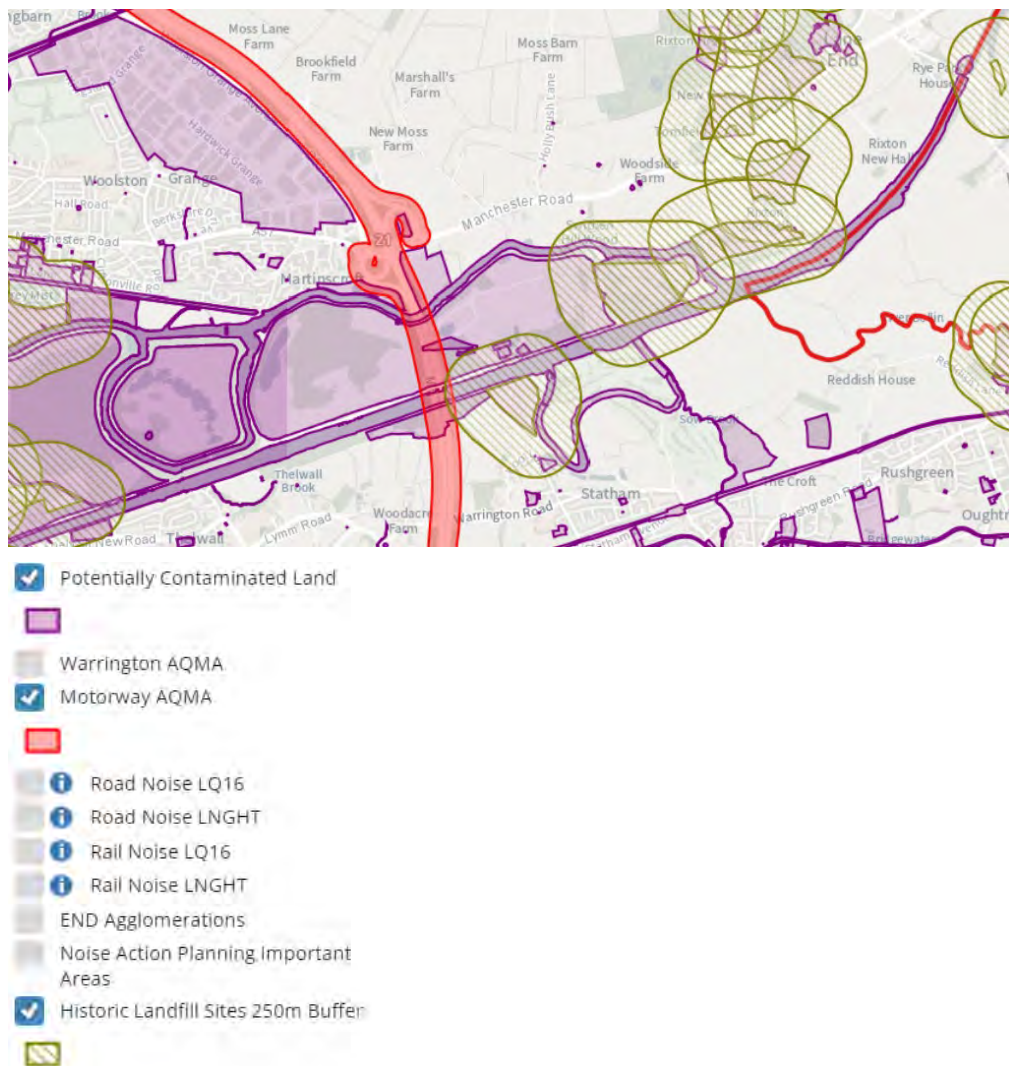


Figure A3.23 Historic Landfill, Potential Contamination, AQMA, Extract Mapping Warrington

Existing infrastructure:

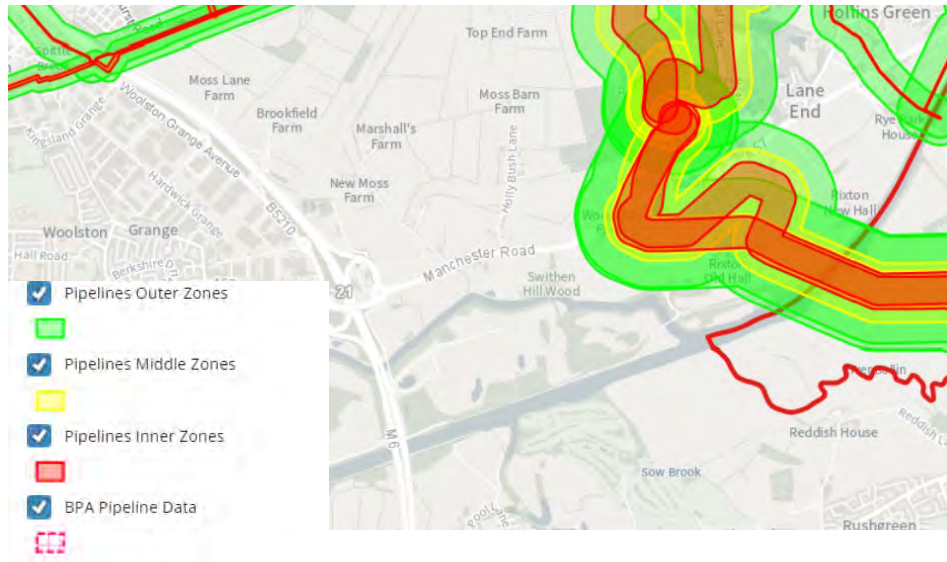


Figure A3. 24 Existing Pipelines, Transmission Sites and Consultation Zones Extract Mapping GM

Agricultural land grade

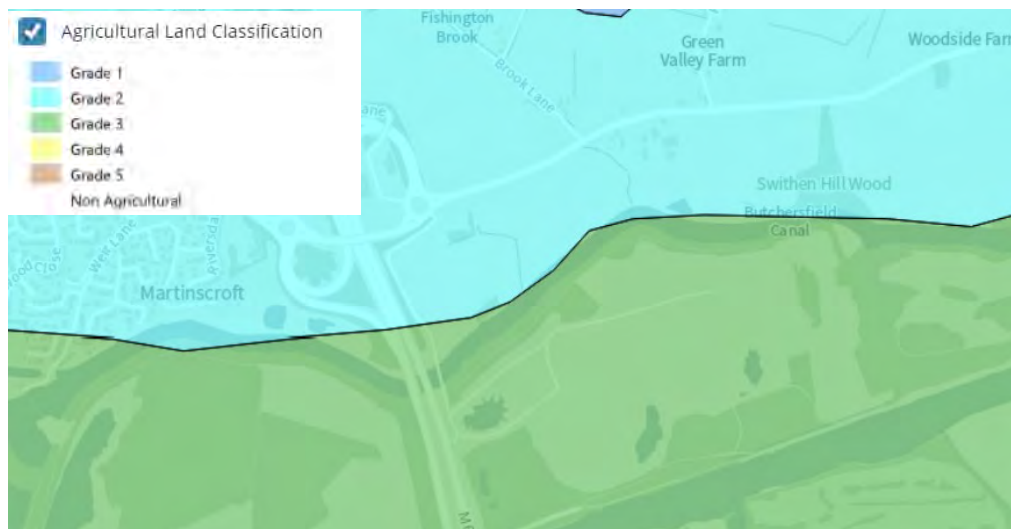


Figure A3.25 Agricultural Land Classification Extract Mapping Warrington

Appendix 4 – Site 9, Junction 23 of the M6

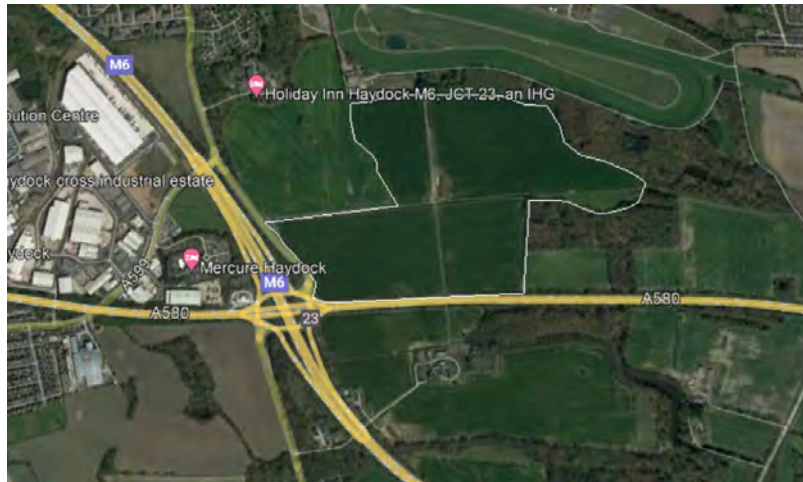


Figure A4.1 Site Location

Planning Criteria

Green Belt Status.

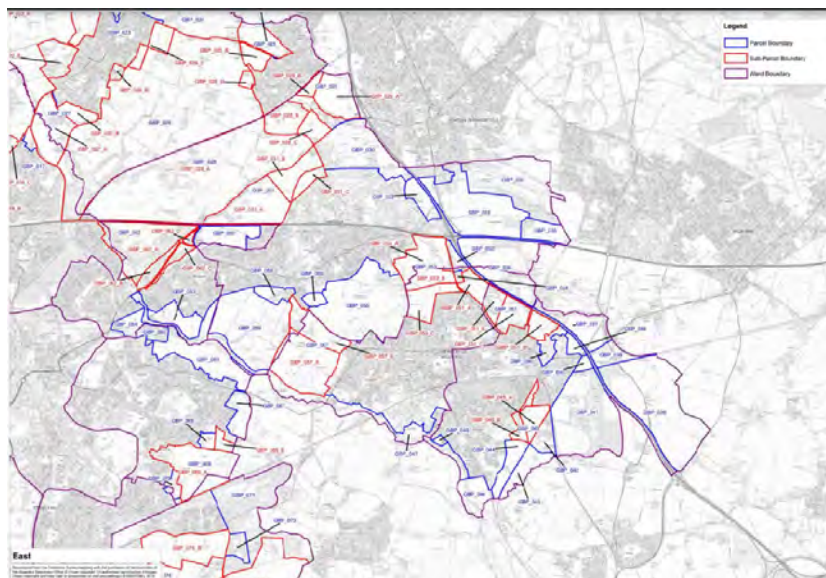
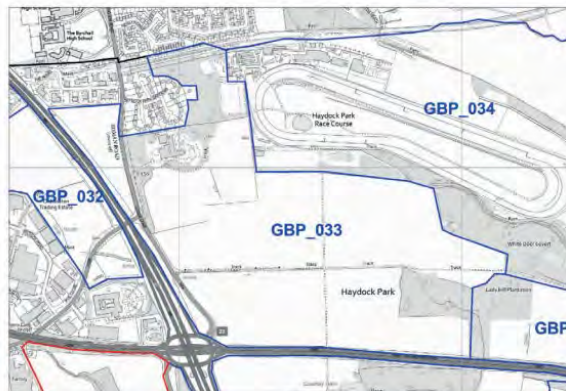


Figure A4.2 Parcel and Sub Parcel boundary Extract Appendix A Green Belt Review, December 2018

Parcel Ref	GBP_033
Name	Land to the east of M6 Junction 23
Ward	Haydock
Sub-Parcels within Parcel	N/A
Size (hectares)	GBP_033: 85.7ha
Description	Very large parcel lying to the east of M6 Junction 23, north of the A580 East Lancashire Road and south of Haydock Park Racecourse. Apart from a hotel located in the north-west corner of the parcel, there is limited development within the parcel, with the parcel consisting of agricultural land and woodland belts.



STAGE 1B ASSESSMENT AGAINST GREEN BELT PURPOSES

Purpose 1 To check the unrestricted sprawl of large built-up areas

Green Belt Parcel or Sub-Parcel	Findings	Green Belt Purpose 1 Score
GBP_033	<p>The parcel is bounded to the south by the A580 East Lancashire Road, to the north by woodland, Haydock Park Racecourse and in-part residential development at Haydock Park Gardens, to the west by the A49 Lodge Lane and M6 motorway and to the east by protected woodland and agricultural land leading to Golborne. Therefore the parcel as a whole has strong boundaries to the north, south, east and west is well contained.</p> <p>In-part the parcel is dislocated from the urban area. The western boundary of the parcel is separated from the large built-up area of Haydock (specifically Haydock Industrial Estate) by the A49 and the M6 and agricultural land and grassland north and south of Penny Lane (11.05ha of land north of Penny Lane has an extant planning permission for employment development). The north and east of the parcel are separated from the large built-up area of Golborne by woodland, Haydock Park Racecourse and agricultural land. The north western boundary of the parcel adjoins residential development at Haydock Park Gardens, and lies directly south of residential properties at Chetwode Avenue and Newlyn Drive which form the southern boundary of the large built-up area of Ashton-in-Makerfield. Therefore the parcel plays an important role in checking the outward expansion of the large built-up areas of Haydock and Ashton-in-Makerfield into the countryside.</p> <p>Despite the parcel being well contained as a whole, because the parcel in-part is dislocated from the urban area, is large and irregular in size and form, and lacks strong boundaries within it, it is considered that development of the parcel would likely lead to unrestricted sprawl.</p>	Medium

Purpose 2 To prevent neighbouring towns merging into one another

Green Belt Parcel or Sub-Parcel	Findings	Green Belt Purpose 2 Score
GBP_033	<p>The parcel forms part of a wider strategic gap between Haydock and Golborne and Haydock and Ashton-in-Makerfield that includes parcels GBP_033, GBP_034 and GBP_035. Development of the parcel would lead to the physical merging of Haydock and Ashton-in-Makerfield and would significantly reduce the scale and integrity of the gap between Haydock and Golborne.</p>	High

Purpose 3 To assist in safeguarding the countryside from encroachment

Green Belt Parcel or Sub-Parcel	Findings	Green Belt Purpose 3 Score

GBP_033	The parcel currently contains very little inappropriate development, and given its size it does retain some open views to the north. However, openness to the south and east is compromised by the M6 and A580. The parcel as a whole has strong boundaries to the north, south, east and west is therefore well contained.	Low
Overall significance of contribution to Green Belt Purposes	Comments	Score
GBP_033	The parcel is well contained. The parcel forms part of a wider strategic gap between Haydock and Golborne and Haydock and Ashton-in-Makerfield. Development of the parcel would lead to the physical merging of Haydock and Ashton-in-Makerfield and would significantly reduce the scale and integrity of the gap between Haydock and Golborne.	High
Carry forward to Stage 2 Assessment?	Parcel GBP_033 continues to make a strong contribution to the purposes of Green Belt land. Given the high overall parcel scoring, ordinarily the recommendation would be for this parcel not to be carried forward to the Stage 2 assessment. However, a strategic aim of the emerging Local Plan is to provide sufficient land to meet local employment land needs in full, in order to ensure a strong and sustainable local economy. It is recognised in the Local Plan's emerging spatial strategy, that in order to meet employment land needs, land will need to be removed from the Green Belt and allocated for employment development. In light of market evidence, the proposed spatial strategy is to largely focus new employment development on large sites capable of accommodating large scale employment opportunities, in close proximity to the strategic road network of the M6 and M62. Consequently, whilst it is acknowledged that there could be a high impact on the Green Belt if parcel GBP_033 were to be developed. Given the high level of importance given to providing sufficient employment land to meet employment land needs in full in the emerging Local Plan, coupled with the potential of the parcel to meet the size and locational requirements of the market, there are considered to be exceptional circumstances to justify carrying the parcel forward to the Stage 2 assessment.	

Figure A4.3 Extract Stage 1B Assessment against Green Belt Purposes, Green Belt Assessment December 2018

4.4 Of the 69 parcels and sub-parcels which scored 'high' or 'high+', the majority were excluded from consideration at subsequent stages of the study. The only exceptions to this were parcels GBP_033, GBP_036 and GBP_039 which were kept in the study notwithstanding their 'high' or 'high+' scores for reasons which are set out below.

4.5 Parcels GBP_033 (land to the east of the M6, Junction 23) and GBP_036 (Land south of A580 East Lancashire Road and south east of M6 Junction 23) are located on the east side of the M6. Due to their contribution to the

strategic gap between settlements they score a 'high' at Stage 1B. However, they are fairly well contained. There is also strong evidence of developer interest in providing employment uses on these parcels, including the sub-regional demand for logistic uses (for which a current shortage of market-attractive sites has been identified). A strategic aim of the emerging Local Plan is to provide sufficient land to meet local employment land needs in full, by focusing new employment development on large sites in close proximity to the strategic road network of the M6 and M62. Having regard to a combination of these factors, parcels GBP_033 and GBP_036 were carried forward to Stage 2 notwithstanding their 'high' score at Stage 1B.

Figure A4.4 Extract Explanatory Text Green Belt Assessment December 2018

Table 5.1: Parcels/sub-parcels – overall score at Stage 3 for employment use

Parcel/Sub-parcel Ref.	Location	Stage 1B Score	Stage 2B Score	Overall Score	Notional capacity (hectares)
GBP_031a	Florida Farm North, Slag Lane, Haydock	Medium	Good	5	36.67ha
GBP_031b	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	Medium	Good	5	20.58ha
GBP_031c	Land to the west of Haydock Industrial Estate, Haydock	Medium	Good	5	7.75ha
GBP_032	Land to the east of Haydock Industrial Estate and to the west of M6 (north and south of Penny Lane), Haydock	Medium	Good	5	13.21ha
GBP_033	Land to the east of M6 Junction 23, Haydock	High	Good	3	55.90

GBP_033 Land to the east of M6 Junction 23, Haydock	85.7ha	Safeguard (in part only, covering 55.9ha)	<p>Although this parcel was proposed to be allocated for employment use at LPPO stage, there are issues that jeopardise its potential for satisfactory delivery within this Plan period. The parcel lies to the east of the M6 and to the south of Haydock Park Racecourse. It was identified at Stage 1B as making a 'High' contribution to the Green Belt, but was not discounted at that stage to enable its potential to help meet the long-term needs for logistics development within the Borough to be considered further. Part of the parcel is subject to a current (as of December 2018) planning application (Ref: P/2017/0254/OUP) for employment development.</p> <p>Development within the parcel is likely to have a substantial impact on highway capacity at Junction 23 of the M6 that immediately adjoins the parcel and currently suffers from significant capacity and congestion issues. These issues are likely to worsen as the Plan period progresses unless substantial improvements are made to this Junction. Junction 23 is a strategically important junction on the highway network, linking the M6 and A49 with the A580 (that provides a major route between Liverpool and Manchester). A study has been</p>
--	--------	---	---

Parcel/Sub-parcel Ref. and location	Notional capacity (hectares)	Allocate, safeguard or discount	Comments on decision
			<p>commissioned by the Council to identify the nature and potential land take of any improvements that are required to the junction, which may include land within this parcel.</p> <p>The 2018 SA concluded that development of the parcel would have a mixed impact on the achievement of SA objectives. The development of the parcel would be likely to have a negative effect on biodiversity. It would also be likely to impact on air quality, particularly as it is located only 27m from an AQMA and the development of the site for employment use would generate more HGV vehicular movements. However, development of the parcel would potentially have positive effects on the local economy due to its location within 1km of an area within the 20% most deprived population in the UK, and development here would help to reduce poverty and social exclusion.</p> <p>Substantial landscape buffers would be required to mitigate the visual effects of any employment development, including alongside the neighbouring Haydock Park Racecourse that is a nationally important tourist attraction.</p> <p>The Council can meet its needs for employment development up to 2035 elsewhere within the Borough without this parcel being allocated. Due to the need to address the severe capacity issues at J23, and the need to avoid constraining the ability to design an appropriate junction layout, the parcel is only suitable for safeguarding to meet potential employment development needs after 2035 (as opposed to allocation for development before 2035).</p>

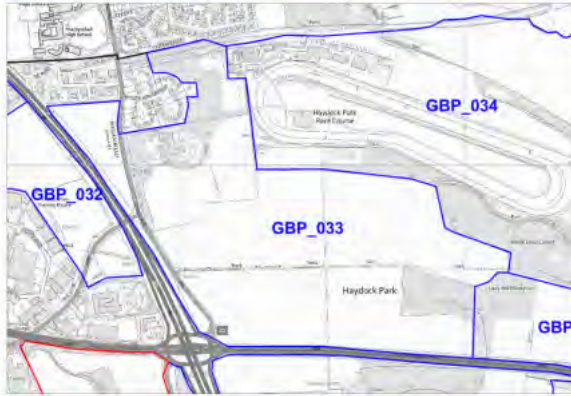
Figure A4.5 Extract Table 5.2 Stage 3 - Employment, Green Belt Review, December 2018

Sub-parcel	GBP_033	LPPO Ref:	EA4	Ward	Haydock	
Location	Land to the east of M6 Junction 23					
Plan	<p>The map displays three parcels: CC13 (purple), CC14 (blue with diagonal lines), and CC15 (blue with horizontal lines). A large area to the east of CC14 is marked with diagonal lines and labeled 'Employment Safeguard'. A green area to the east is labeled 'Proposed Greenbelt'. A legend at the bottom identifies symbols for Parcel Boundary, Housing Allocation, Housing Safeguard, Housing Allocation (not in Green Belt), Employment Allocation, Employment Safeguard, Parkside East, Consequential Green Belt Land Removal, and Proposed Greenbelt.</p>					
Summary						
Stage 1b (Purposes of Green Belt)	Stage 2b (Developability Assessment)	Agricultural Land Classification	Overall Scores	Preferred Use	Residential Density (dph)	Net Developable Capacity (NDC)
High	Good	Grade 3	3	Employment	N/A	55.90ha
Consequential Changes		Yes – CC14				
Reason for Consequential Changes		CC14 – Section of the M6 motorway and land east and west of Lodge Lane, the Holiday Inn hotel and Haydock Park Gardens (residential). Land to the south east, east and west of this area has been recommended for removal from the Green Belt to accommodate new development. If this area was not released it would create an isolated 'island' of Green Belt. It would serve no Green Belt purpose to leave it in the Green Belt.				
Designation		Safeguard				

Figure A4.6 Extract Summary Overview Sheet, Green Belt Review, December 2018

STAGE 2B DEVELOPABILITY ASSESSMENT

Parcel Ref and Location	GBP_033 - Land to the east of M6 Junction 23
Sub-parcels discounted at stages 1B or 2A	N/A
Area covered by stage 2B assessment	Whole parcel - 85.7ha



SUITABILITY

Landscape and visual character	<i>The landscape character type is Woodland Former Estate and the landscape character area is Haydock Park. The parcel has medium landscape sensitivity and medium visual sensitivity.</i>
Ecology	<i>A LWS (Haydock Park Woodland) lies adjacent to the east and north of the parcel. The Sankey Catchment Partnership have advised that should development take place on this site then any development should seek to improve water vole habitat by extending further into the woodland. MEAS have commented that a buffer would need to be maintained and incorporate woodland planting. An Ecological Appraisal would also be required if any planning application were to be submitted.</i>
Agricultural Land Quality	<i>Grade 3 - good to moderate quality agricultural land.</i>
Heritage Assets	<i>No recorded assets on or within close proximity of the parcel. The site contains the following non-designated heritage assets recorded on the Merseyside Historic Environment: MME 9118 – Haydock Park, 14th century. There is a potential that both buried archaeological features and surviving earthworks associated with the former park might be encountered by</i>

	development.
Flooding	<i>The parcel is located within flood zone 1. Parts of the parcel fall within 30, 100, 1000year surface water areas, with the most significant surface water 30-year event experienced to the centre of the southern boundary along the A580. LLFA Comments: At application stage. Requires full SuDS assessment including full management and maintenance proposals. Greenfield run-off rate. Watercourse main discharge point, minimum of 40% climate change allowance. Full SuDS components preference of open swale/pond systems. Avoid culverting. Easement required from top of bank for maintenance. Easement needs to be accessible, minimal / no private ownership and be able to convey plant machinery.</i>
Trees and Woodland	<i>Protected woodland to the south-east of the parcel (Lady Hill Plantation), that would need to be retained should the parcel be allocated.</i>
Open Space and Recreation	<i>No Open Space or Recreation Areas within or adjoining the parcel.</i>
Minerals	<i>The parcel lies outside any proposed Mineral Safeguarding Area.</i>
Infrastructure	<i>The West East Link Main, Lodge Lane Wastewater Pumping Station, a pressurised foul sewer and a gravity foul sewer all lie within the site and would need to be afforded due consideration in any site masterplanning.</i>
Ground conditions	<i>The parcel is not within 250m of an active or former landfill site. The parcel is not affected by any known sources of contamination. The parcel falls within the Coal Authority's 'Low Risk' area of known subsidence from the legacy of coal mining operations.</i>
Air, water and noise pollution	<i>A small part of parcel (western boundary) lies within an Air Quality Management Area Buffer zone (M6 corridor). The parcel is located within a Total Catchment (Zone 3) Groundwater Source Protection Zone.</i>
Hazardous installations	<i>No identified issues. The parcel is not located within a Health and Safety Executive consultation zone.</i>
Neighbouring uses	<i>Small section of office uses and racecourse to the north, but mainly agricultural uses.</i>
Any other constraints	<i>Surrounding highway network is congested on race days. Haydock Island experiences congestion issues (J23 of the M6 motorway).</i>

TRANSPORT ACCESSIBILITY

Walking	<i>The parcel is not within 800m safe and convenient walking distance of a district or local centre. Approx. 2.52km walking distance to nearest shops (being Clipsley Lane Local Centre)</i>
Cycling	<i>The parcel is not within a 1 mile safe and convenient cycling distance of a district or local centre.</i>
Public Transport	<i>There are parts of the parcel within 400m of a safe and convenient walk to a bus stop. There is a minimum of 4 services an hour in this location, predominantly to and from Ashton-in-Makerfield and St. Helens Town</i>

	Centre. The parcel is not within 800m walking distance of a train station.
Vehicular Traffic	Access could be provided over the racecourse entrance route, but the existing access gates would need to be relocated. There is no obvious opportunity to extend Haydock Park Gardens without purchasing one of the existing dwellings. Currently St. Helens Council are carrying out a Transport Study at J23 of the M6 to identify what the required future enhancement and improvement requirements would be to address the existing capacity issues and potential future issues generated as a result of proposed growth for the Borough, the land requirements for which have yet to be defined.

AVAILABILITY

Ownership	Peel Investments (North) Ltd., represented by Turley (Call for Sites form 2014_013)
Existing use	Agricultural
Current planning status	Green Belt – current planning application (P/2017/0254/OUP – outline application for development of the site for B8/B2 uses with ancillary offices etc. – awaiting decision
Use(s) promoted by landowner(s)	Employment/Industrial

ACHIEVABILITY

Viability Considerations	Parcel lies within EVA Zone 3. Parcel is considered viable for development.
Gross Developable Area	GBP_033 = 85.7ha
Net Developable Area	As Above
Notional Development Capacity	As Above

CONCLUSIONS ON DEVELOPABILITY

Summary of Developability Assessment	The parcel contains a number of protected copses and woodland to the north and south-east. Part of the parcel (western boundary) lies within an Air Quality Management Area Buffer zone (M6 corridor), therefore if the parcel should come forward for allocation this would need to be investigated further and dealt with at planning application stage. There are existing capacity problems at J23, and access to the site would have to be via the A580. Transport assessments would need to clearly show that development of this parcel would not have a further detrimental impact on the free flow of the junction. Access to the site could also have an impact on the outcomes and findings of the J23 Transport Improvement Study. The parcel has received strong market interest. It is a prime location for large scale distribution warehousing due to its easy access to a motorway, nearby labour supply and public services.
Preferred use (to be considered in stage 3)	Employment/Industrial
Notional development capacity (to be considered in stage 3)	GBP_033 = 85.7ha
Developability Score	Medium Development Potential

Figure A4.7 Extract Stage 2B Assessment, Stage 2B Assessment Green Belt Assessment, October 2020

	Reasoned Justification, New Paragraphs following 4.24.5	<p><u>Green Belt Exceptional circumstances</u></p> <p>4.24.6 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis for safeguarding for development beyond the end of the plan period. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</p> <p>Employment safeguarded sites</p>	To provide the site specific exceptional circumstances for the proposed safeguarded housing and employment sites, justifying their release from the Green Belt.
--	---	---	---

		<p>2ES – Land North East of Junction 23 M6 (South of Haydock racecourse), Haydock</p> <p>4.24.9 <u>The Green Belt Review found the parcel of land generally reflecting this site boundary to make a 'high' overall contribution to the Green Belt purposes. Whilst ordinarily a site with such a score would not be considered further, there is a clear need to provide sufficient land for employment both within the plan period, and beyond it. Given the importance of meeting such needs, coupled with the potential of the site to meet the size and locational requirements of the market, there are exceptional circumstances to safeguard this site for longer term needs beyond the Plan period. Whilst there are clear harms in relation to the development of this site, including harm to Green Belt and adverse landscape impacts, it should also be noted that the site is located within 1km of an area with the 20% most deprived population in the UK, so development here in the longer term would help to reduce poverty and exclusion. Whilst the site did not score as well as the allocated employment sites through the Green Belt Review, the need to make provision for employment land beyond the Plan period forms the basis for the exceptional circumstances to justify the removal of this site from the Green Belt for safeguarding.</u></p>
--	--	---

Figure A4.8 Schedule of Proposed Main Modifications, St Helens Local Plan, November 2021, NB: The Main Modifications went to Cabinet on November 10th 2021.

Existing Use

Planning Policy Position.

Adopted Development Plan

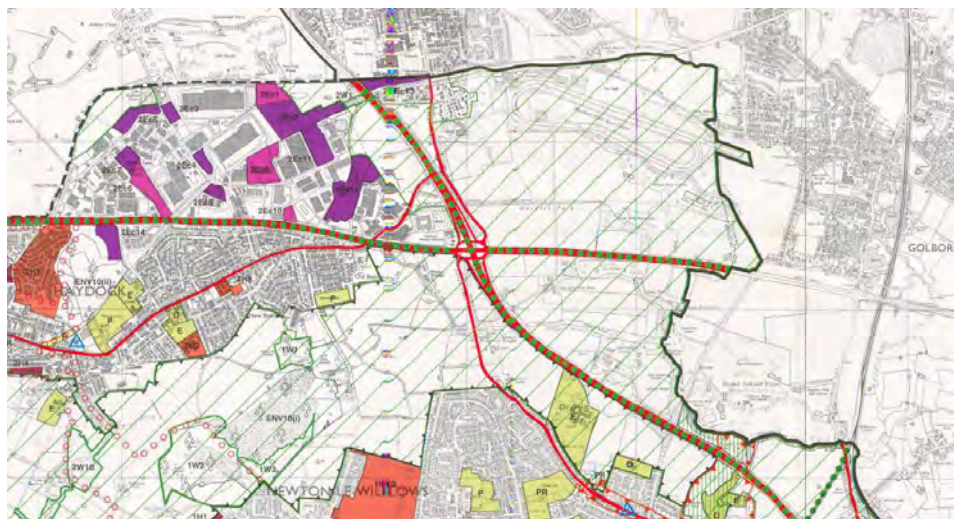


Figure A4.9 Extract of Adopted UDP Proposals Map South, July 1998.

Emerging Development Plan

Legend	Main Policies		Main Policies
			LPA07
	LPA05		LPA07
	LPA04		LPA07
	LPA05		LPA07
	LPA05		LPA07
	LPA04		LPA07
	LPA06		LPA07
	LPA06		LPA07
	LPA10		LPA07
	LPC03		LPC12
	LPC03		LPC12
	LPC04		LPC12
<small>1. Billinge, 2. Clann Linn, 3. Clatby Lane, 4. Dentons Green, 5. Eccleston, 6. Fingerpost, 7. Newton-in-Willows, 8. Newtown, 9. Rainford, 10. Salford, 11. Marshalls Cross, 12. Rainhill, 13. Thurstle Holm</small>			LPA02, LPA06
	LBP01, LPC04		LPC12
	LPB01, LPC04		LPC11
	LPB01, LPB02, LPB04		LPC11
	LPB01, LPC04		LPC06, LPC08
	LPB01, LPC04		LPC07
	LPB01		LPC06
	LPC14 (see appendix 12)		LPC06
	LPC14 (see appendix 12)		LPC05
		<small>Parks and Gardens (PG), Natural and Semi-Natural Greenspaces (NSN), Arterial Greenspace (AG), Provision for Children and Young People (Including Equipped Play Areas) (CYP), Allotments (A), Cemeteries and Churchyards (C), Outdoor Sports and Recreation Facilities (Including Playing Fields, Golf Courses, Bowling Greens, Tennis Courts and Balling Spaces) (OSR)</small>	
		<small>* for information only, may change as updated outside of the Local Plan process</small>	

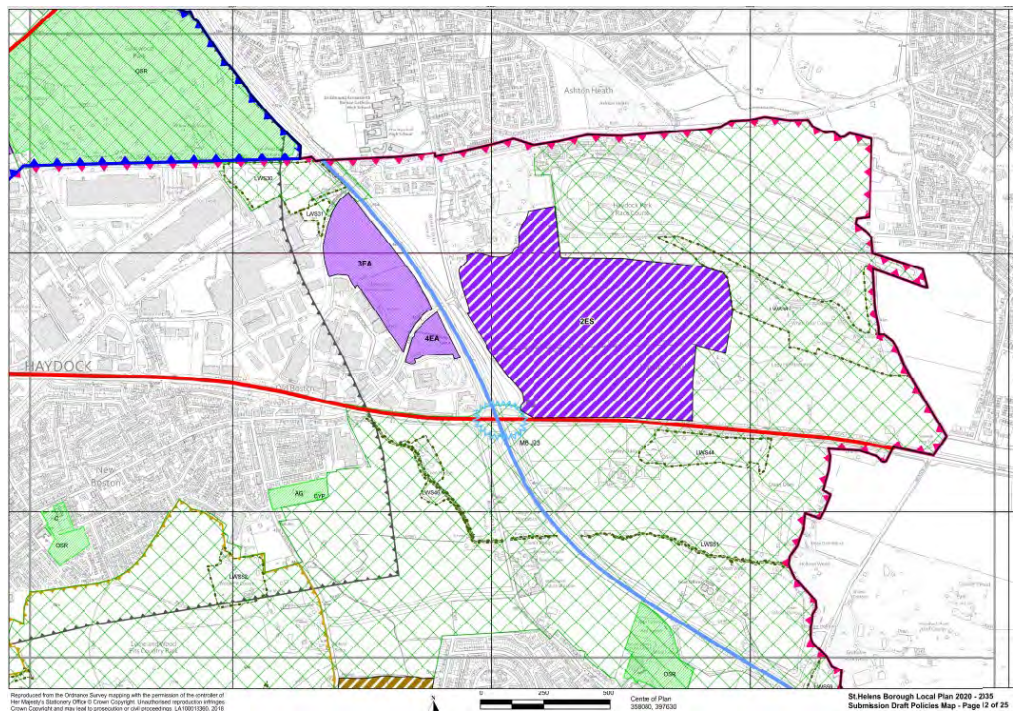


Figure A4.10 St Helens Local Plan Submission Draft Policies Map, January 2019

	<p>Reasoned Justification, New Paragraphs following 4.24.5</p>	<p><u>Green Belt Exceptional circumstances</u></p> <p><u>4.24.6 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis for safeguarding for development beyond the end of the plan period. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</u></p> <p><u>Employment safeguarded sites</u></p>	<p>To provide the site specific exceptional circumstances for the proposed safeguarded housing and employment sites, justifying their release from the Green Belt.</p>
--	--	--	--

		<p>2ES – Land North East of Junction 23 M6 (South of Haydock racecourse), Haydock</p> <p>4.24.9 The Green Belt Review found the parcel of land generally reflecting this site boundary to make a 'high' overall contribution to the Green Belt purposes. Whilst ordinarily a site with such a score would not be considered further, there is a clear need to provide sufficient land for employment both within the plan period, and beyond it. Given the importance of meeting such needs, coupled with the potential of the site to meet the size and locational requirements of the market, there are exceptional circumstances to safeguard this site for longer term needs beyond the Plan period. Whilst there are clear harms in relation to the development of this site, including harm to Green Belt and adverse landscape impacts, it should also be noted that the site is located within 1km of an area with the 20% most deprived population in the UK, so development here in the longer term would help to reduce poverty and exclusion. Whilst the site did not score as well as the allocated employment sites through the Green Belt Review, the need to make provision for employment land beyond the Plan period forms the basis for the exceptional circumstances to justify the removal of this site from the Green Belt for safeguarding.</p>
--	--	--

Figure A4.11 Schedule of Proposed Main Modifications, St Helens Local Plan, November 2021, NB: The Main Modifications went to Cabinet on November 10th 2021.

Impact on Heritage Assets

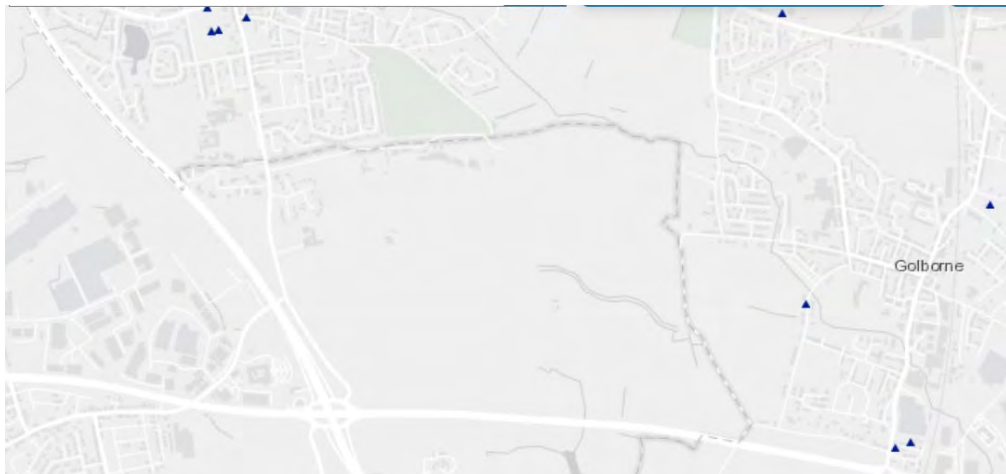


Figure A4.12 Listed Buildings, Structures and Scheduled Monuments. Source: Historic England <https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

Relevant Planning History –

14. The Secretary of State notes that at the time of the Inquiry the policies and site allocations of the eLP were subject to objection and ongoing examination for soundness and agrees that they therefore carried little weight in themselves (IR8.5). He agrees with the Inspectors that the employment evidence base of the eLP is germane to the present proposal and carries weight as a material consideration in this case (IR8.5).

Openness of the Green Belt

16. The Secretary of State agrees with the Inspectors for the reasons given at IR8.8-9 that the development would have a very significant impact on the openness of the Green Belt. He agrees that the loss of the essential and fundamental openness of the Green Belt carries substantial weight against the appeal.

Green Belt Purposes

17. For the reasons given at IR8.10, the Secretary of State agrees that the development would cause a significant measure of harm to the purpose of the Green Belt to prevent urban sprawl and would also compromise, to some extent, the purpose of the preventing neighbouring towns from merging. He further agrees that the built development would encroach blatantly into the countryside of rural St Helens, in further contravention of the purposes of including land in the Green Belt.
18. As such he agrees with the Inspectors at IR8.11 that the overall definitional and practical harm to the Green Belt, its openness, and purposes that would arise as a result of proposed development carries substantial weight against the appeal.

19. For the reasons given at IR8.12-IR8.18, the Secretary of State agrees (IR8.18) that whether or not the appeal site is to be regarded as part of a valued landscape in the strict terms of NPPF paragraph 174, it clearly has perceived and actual local landscape value. He further agrees that any significant degree of adverse impact or positive enhancement affecting the landscape of the appeal site would be a material consideration to be weighed in the overall planning balance.

Landscape Impact

20. For the reasons given at IR8.19, the Secretary of State agrees that the proposed buildings would radically alter the currently open rural landscape and its immediate surroundings. He agrees that this would permanently render it highly urban in character (IR8.19) and that for the reasons given the degree of impact can only be categorised as high adverse (IR8.20).

Landscape Mitigation

21. The Secretary of State agrees at IR8.22 that screening would do nothing to offset the removal of a large area of open, rural landscape, and that the proposed screening would impose a virtually continuous visual impediment to views across the site. He further agrees at IR8.22 that this would override any perceived enhancement by way of the proposed strengthening of, and increase in, the total extent of woodland in the area, coupled with intended enhancement of grassland and wetland habitats.

Conclusion on Visual Impact and Landscape

22. The Secretary of State agrees that the development would cause adverse landscape and visual impact, even taking into account the extensive mitigation measures that would be secured by planning condition (IR8.23). He agrees with the Inspectors that judged on all the evidence, the degree of harm to the landscape would be major adverse, only becoming moderate adverse after at least fifteen years (IR8.23). He further agrees that the appeal proposals are accordingly in substantive conflict with the protective provisions of CS Policies CAS5.1-2, CP1.1 and CQL4 with respect to the landscape. He agrees that this consideration carries significant weight in the planning balance (IR8.24).

25. For the reasons given at IR8.27-8.30, the Secretary of State agrees that the technical highways evidence of the appellants is to be preferred (IR8.29), and that the A49 diversion would be in the wider public interest. (IR8.30). He further agrees with the Inspectors at IR8.33 that the proposed off-site highway works, as they affect M6 J23, are the minimum required in practice to accommodate the additional traffic generated by the development. He further agrees with the Inspectors at IR8.34 that off-site improvements would make a permanent contribution, in both substantial financial and practical terms, to the ultimate wider improvement to M6 J23, notwithstanding that a wider improvement currently remains aspirational and devoid of detailed design or funding.

43. Weighing against the proposal is Green Belt harm by virtue of inappropriateness, loss of Green Belt openness, harm to the purpose of preventing urban sprawl and encroachment into the countryside. This attracts substantial weight. Also weighing against the proposal is landscape harm which attracts significant weight, loss of agricultural land which carries limited weight, and heritage impacts which attract very limited weight.

Figure A4.13 Extracts SoS Conclusions: Appeal Reference: APP/H4315/W/20/3256871, Planning Application Reference Town And Country Planning Act 1990 – Section 78 Appeal

Made By Peel Investments (North) Limited Haydock Point - Land At A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens, Wa12 0hl Application Ref: P/2017/0254/OUP 11,11,2021

Emerging Local Plan

- 4.14 The site is within an area safeguarded by Policy LPA06 of the eLP but this is expressly for employment development well beyond the Plan period. Moreover, Policy LPA06 is subject to objection in the current local plan examination and carries limited weight at this stage. Exceptional circumstances for the development of the safeguarded land would be subject to at least two future reviews of the Plan. Nor does Policy LPA06 indicate the type, amount, scale or arrangement of development on the land. Meanwhile, the integrity of the Green Belt should be maintained. The need for employment land to 2035 can be met by the eLP allocations, without the development of the present appeal site.
- 4.15 Neither, therefore, is there any support in the eLP for the development of the appeal site as proposed in this appeal.

Harm to Green Belt Openness

- 4.17 PPG advice is to consider the impact on the openness of the Green Belt in terms of its spatial, visual, duration and activity aspects and this reflects case law [ID29.24##88-91].
- 4.18 Spatially, the site is currently free from built development with an open character, barring a gappy hedgerow and a rural power line, such that it is agreed that the site could not be more open. The development would have a significant adverse impact on this openness in spatial terms, which lies towards the top end of the scale of such impact.
- 4.19 Visually, it is possible to see across the site from the Holiday Inn to the A580 and from Lodge Lane to Haydock Park Racecourse and the eastern appeal site boundary, with no intervening features. It is accordingly agreed that the proposed buildings would have a significant impact on the visual openness of the site. The proposed boundary tree planting would further reduce its visual openness, to the extent that it would be completely lost. It is therefore unanswerable that the visual impact of the development upon the openness of the site would be at the top of the scale of significant and adverse. This is further supported by the landscape evidence (*below*). The Appellants argue that the visual envelope of the site is relatively local, with a backdrop of urbanising features. However, as the essential characteristic of the Green Belt

is its openness, those features make the current openness of the appeal site more, not less important in the wider area. This is an aggravating factor. As agreed in the Landscape SoCG, the volumes of the proposed buildings would be most significant on a site agreed to be spatially and visually open.

- 4.20 As to duration, the development would be permanent, a further aggravating factor.
- 4.21 A high degree of activity would be introduced onto the site, which is presently wholly inactive. The realigned A49 via the site would be heavily trafficked by two-way flows equivalent to some 1,200 passenger car units (pcus) per peak hour, including a significant proportion of HGVs. In addition, there would be HGV and car parking and activity by upwards of 2,000 employees, with 24-hour working and associated lighting. These would be further aggravating factors towards the top end of the scale of generated activity.
- 4.22 The impact of the appeal proposal on the openness of the Green Belt would therefore be significant and adverse and must carry substantial weight. In contrast, the Appellants have under-assessed this impact of the proposal.

Harm to Green Belt Purposes

- 4.23 In the St Helens Local Plan Green Belt Review 2016-18 (GBR) [CD3.5], the appeal forms a substantial proportion of Plot 033 which, the GBR concludes, forms part of a wider strategic gap between Haydock, Golborne and Ashton-in-Makerfield. Its development would lead to the physical merging of Haydock and Ashton and significantly reduce the scale and integrity of the gap between Haydock and Golborne. The overall contribution of Plot 033 to Green Belt purposes is high and it should not be carried forward for development. This is consistent with the separate conclusions of the LCA (*below*) that the appeal site should not be developed and that the M6 should remain as a strong logical barrier between the industrial edge of Haydock and the rural area to the east. Significant weight should be attached to this professional consensus. This conclusion applies even more to the appeal site than to the whole of Plot 033 because the site itself has fewer urban constraints.
- 4.24 With respect to the purpose of checking unrestricted urban sprawl, the development would breach the boundary of the M6 and create sprawl outside the well-defined settlement limit of Haydock, save for a remnant field to the north west of the realigned A49, adjacent to the Holiday Inn. This impact would be significant and adverse, especially if land to the south east and south of M6 J23 were developed, as is indeed proposed by the Appellants themselves, in connection with the eLP.
- 4.25 With respect to the purpose of preventing towns from merging, the GBR assesses the appeal site as part of an essential strategic gap which makes a high contribution in this respect. The impact on this purpose would be significant and adverse. Any contrary view is untenable due to the fundamental change that would take place in the relationship of Haydock to Ashton-in-Makerfield.
- 4.26 With respect to the purpose of safeguarding the countryside from encroachment, the GBR scores Plot 033 as low due to limited rural characteristics. However, this should be raised to high for the appeal site itself

which the LCA characterises as fundamentally rural, open farmland in a landscape of fields and woodlands. The impact of the development would be significant and adverse in this respect also.

- 4.27 The scheme would not affect the purpose of encouraging the recycling of urban land because it is accepted that here is no urban site suitable for the proposed development.
- 4.28 The purpose of preserving the character of historic towns does not apply in this case.

Overall Harm to the Green Belt

- 4.29 Overall, substantial weight must be attached to these impacts that the proposed development would have on the Green Belt.

Wider Future Improvement to M6 J23

- 4.51 This proposal includes the realignment of the A49 via the appeal site and this is a necessary component of any future comprehensive improvement of M6 J23. Any weight to this factor in the present case is to be judged upon the degree of certainty that attaches to the potential delivery of such a scheme.
- 4.52 In this respect, the facts are not disputed. In essence, these are that there is: no agreed scheme; no resolution to promote any scheme by the Council, Wigan MBC or Highways England; no cost estimate; no funding; no business case as a necessary precursor for funding; and no planning permission. There is also a question of whether third party land would be needed and whether it could be acquired. There is accordingly no reasonable prospect that the wider M6 J23 improvement will proceed.
- 4.53 Therefore, no material weight can attach to the re-alignment of the A49 at this stage. Rather, it falls to be considered as necessary mitigation for the appeal proposal and is therefore neutral in the planning balance.

Figure A4.14 Extracts of the Inspectors Report (Summary of Councils Case): Appeal Reference: APP/H4315/W/20/3256871, Planning Application Reference Town And Country Planning Act 1990 – Section 78 Appeal Made By Peel Investments (North) Limited Haydock Point - Land At A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens, Wa12 0hl Application Ref: P/2017/0254/OUP 11,11,2021

- 8.8 The appeal proposal would lead to the spatial loss of 42.3ha of Green Belt land to permanent built development on a vast scale with a high level of associated activity. In its current state, the site is essentially free from buildings or other visual obstructions, such that there are clear views across it. Consequently, the development would have a very significant impact on the openness of the Green Belt.
- 8.9 In visual terms, external views of the site are relatively local and the M6 and A580, the Holiday Inn and the grandstands and other buildings of Haydock Park Racecourse lie close to its eastern, southern and northern boundaries respectively. Almost immediately west of the M6 is the extensive Haydock Industrial Estate (HIE). However, the proximity of these urban influences and features would do nothing to offset but, on the contrary, would serve to emphasise the permanent loss of openness, notwithstanding the relative containment of external views. Moreover, the proposed landscape bunding and tree screening round the site, intended to soften the appearance of the buildings in the landscape, would aggravate the obvious loss of the essential and fundamental openness of the Green Belt. That loss carries substantial planning weight against the appeal. [4.17-22, 5.6]
- 8.10 The appeal site forms only about 50% of Plot 033 of the Green Belt Review (GBR) so that much of the Plot would survive, still to provide a green gap between the clearly defined boundaries of the development and the towns of Haydock and Ashton. Whilst these towns would retain their separate definition, this does not alter the fact that the development would extend large-scale built form across the M6 into presently open fields within rural St Helens. Surrounding major roads and urban features serve to emphasise the open rural nature of the site itself, contrary to the proposition of the Appellants that it is not read as open countryside in the manner of the wider Green Belt. Consequently, the development would cause a significant measure of harm to the purpose of the Green Belt to prevent urban sprawl and would also compromise, to some extent, the purpose of preventing neighbouring towns from merging. Furthermore, it is clear that the built development would encroach blatantly into the countryside of rural St Helens, in further contravention of the purposes of including land in the Green Belt. [4.23-28, 5.7]
- 8.11 The overall definitional and practical harm to the Green Belt, its openness and purposes that the proposed development would cause carries substantial weight in the balance of planning considerations. [4.29, 5.7]

Conclusion on Visual Impact and Landscape

- 8.23 There is no dispute that the development would cause adverse landscape and visual impact, even taking into account the extensive mitigation measures that would be secured by planning condition. Judged on all the written, oral and photographic evidence and direct inspection, the degree of harm to the landscape would be major adverse, only becoming major to moderate adverse after at least fifteen years.
- 8.24 The appeal proposals are accordingly in substantive conflict with the protective provisions of CS Policies CAS5.1-2, CP1.1 and CQL4 with respect to the landscape. This consideration carries significant weight in the planning balance.
- 8.25 There is natural tension between this conclusion and the draft proposal of the eLP to safeguard the very same land for similar development to that subject to this appeal. Crucially however, that proposal carries the very limited weight of an eLP under objection and still in the early stages of examination. Moreover, even if adopted without modification, the safeguarding merely contemplates such development well beyond the Plan period, and thus also beyond at least two periodic local plan reviews. The draft safeguarding therefore has minimal bearing on the present assessment of the effects of the development now at appeal. [4.42-43, 5.10, 5.19-20, 5.22]
- 8.28 The proposed development would advance the works to divert the northern arm of the A49, valued at £11.9 million but delivered at no public cost. At the same time, off-site works would create improvements to the layout and capacity of M6 J23 as a whole. These improvements would marginally improve the overall Practical Reserve Capacity (PRC) of M6 J23, even with the proposed development in operation. More importantly, they would result in significant reductions in peak queue lengths and waiting times. In addition, there would be some improvement in safety due to reduced potential for pedestrian and cycle conflicts with vehicles and an easing of congestion on Haydock Park race days. [4.45-50, 5.27, 5.29-35, 6.12-13, 7.52-54]
- 8.33 It is clear and undisputed that the proposed off-site highway works, as they affect M6 J23, are the minimum required in practice to accommodate the additional traffic that would be generated by the development. These include the diversion of the northern arm of the A49 via the site, serving both as its main access road and as the through route of the A49 north of the A580. [4.44, 4.51, 5.24]
- 8.34 Furthermore, the removal of the northern A49 node from M6 J23 and the traffic lane improvements to J23 itself would make a permanent contribution, in both substantial financial and practical operational terms, to the ultimate, long-sought, permanent, wider improvement to M6 J23. That is notwithstanding that a wider improvement currently remains aspirational and devoid of detailed design or funding. [4.52, 5.34]

Overall Planning Balance and Conclusion

- 8.74 The proposed development would give rise to harm to the Green Belt by definition and also by significantly reducing its essential spatial and visual openness and by compromising the purposes of including land in the Green Belt. In particular, it would harm the purposes to check the unrestricted sprawl of large built-up areas and to assist in safeguarding the countryside from encroachment. This harm to the Green Belt carries substantial weight.
- 8.75 The development would also cause harm to the landscape and visual amenity. This harm carries significant weight.
- 8.76 Accordingly, the proposed development would be in conflict with the development plan and the appeal should be dismissed, unless there are very special circumstances to justify it within the Green Belt.

- 8.82 Although the eLP is under examination for soundness and carries little weight at the present time, its evidence base demonstrates that, although the policy requirement for employment land in the current development plan is out-of-date and inadequate, it is likely that the eLP will ultimately provide for sufficient employment land for the needs of St Helens Borough. That would be at least for the Plan period to 2035 without a need for the present appeal site to be allocated. The eLP would simply safeguard the appeal land for employment development well beyond 2035 and, it follows, beyond at least two reviews of the Plan meanwhile.
- 8.83 Notwithstanding the tension between the proposed safeguarding, on the one hand, and the opposition of the Council to this proposal, on the other, the draft safeguarding clearly carries minimal weight in connection with this appeal. The fact that there is evident likelihood of a sufficient supply of employment land, excluding the appeal site, is the more cogent consideration in the present case.

Figure A4.15 Extract Inspectors conclusions: Appeal Reference: APP/H4315/W/20/3256871, Planning Application Reference Town And Country Planning Act 1990 – Section 78 Appeal Made By Peel Investments (North) Limited Haydock Point - Land At A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens, Wa12 0hl Application Ref: P/2017/0254/OUP 11,11,2021

Engineering, Safety and Operational Issues

Highways Engineering / The ability of a site to provide safe access

- 8.28 The proposed development would advance the works to divert the northern arm of the A49, valued at £11.9 million but delivered at no public cost. At the same time, off-site works would create improvements to the layout and capacity of M6 J23 as a whole. These improvements would marginally improve the overall Practical Reserve Capacity (PRC) of M6 J23, even with the proposed development in operation. More importantly, they would result in significant reductions in peak queue lengths and waiting times. In addition, there would be some improvement in safety due to reduced potential for pedestrian and cycle conflicts with vehicles and an easing of congestion on Haydock Park race days. [4.45-50, 5.27, 5.29-35, 6.12-13, 7.52-54]
- 8.33 It is clear and undisputed that the proposed off-site highway works, as they affect M6 J23, are the minimum required in practice to accommodate the additional traffic that would be generated by the development. These include the diversion of the northern arm of the A49 via the site, serving both as its main access road and as the through route of the A49 north of the A580. [4.44, 4.51, 5.24]
- 8.34 Furthermore, the removal of the northern A49 node from M6 J23 and the traffic lane improvements to J23 itself would make a permanent contribution, in both substantial financial and practical operational terms, to the ultimate, long-sought, permanent, wider improvement to M6 J23. That is notwithstanding that a wider improvement currently remains aspirational and devoid of detailed design or funding. [4.52, 5.34]

Figure A4.16 Extract Inspectors conclusions: Appeal Reference: APP/H4315/W/20/3256871, Planning Application Reference Town And Country Planning Act 1990 – Section 78 Appeal Made By Peel Investments (North) Limited Haydock Point - Land At A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens, Wa12 0hl Application Ref: P/2017/0254/OUP 11,11,2021

Environmental Considerations

Other Environmental Constraints

Flood Zone / Risk;

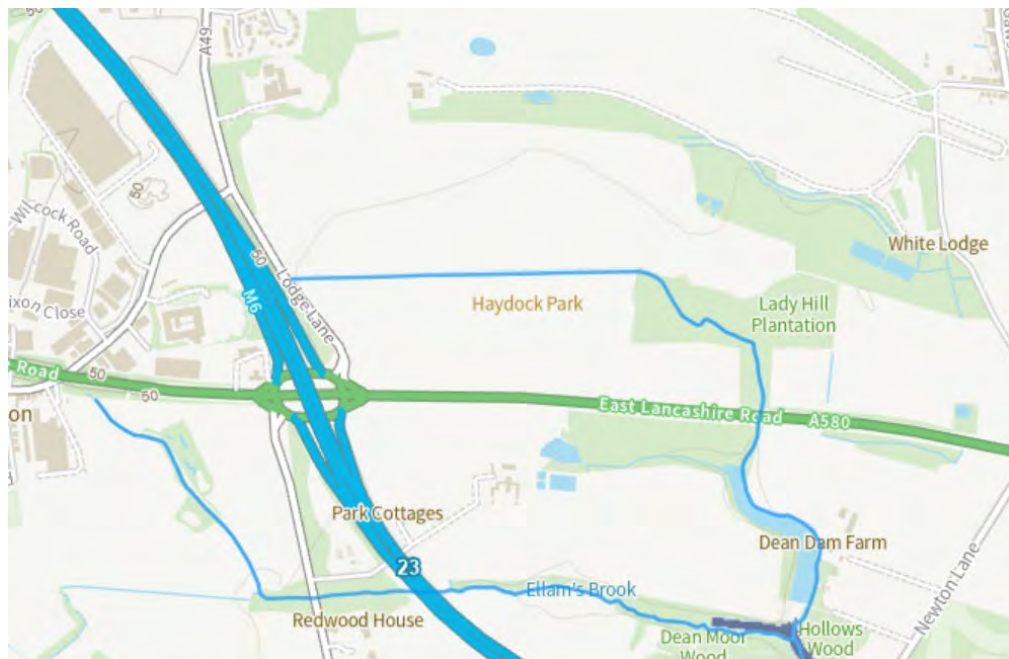


Figure A4.17 Extract: EA Flood Map for Planning

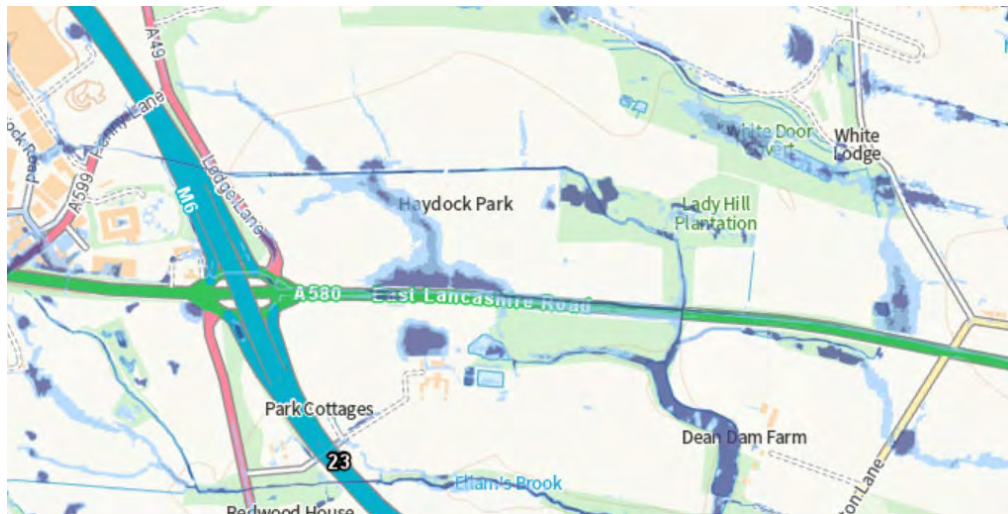


Figure A4.18 Extract: EA Extent of Flooding: Surface Water Flooding <https://check-long-term-flood-risk.service.gov.uk/map>

Ecology and Bio-diversity;

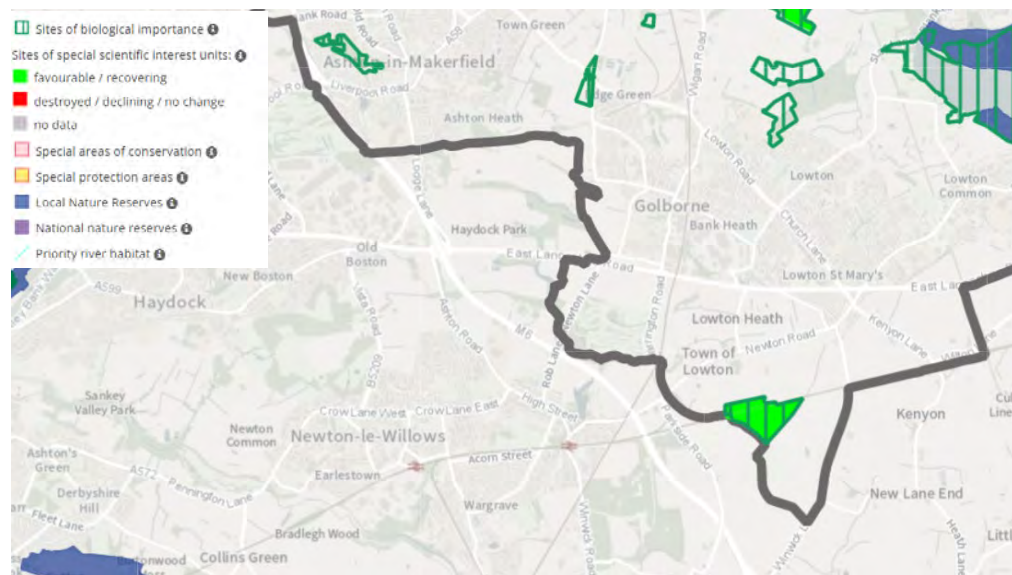


Figure A4.19 Sites of Biological Importance, SSSI's Local Nature Reserves Extract Mapping GM

Ground conditions;

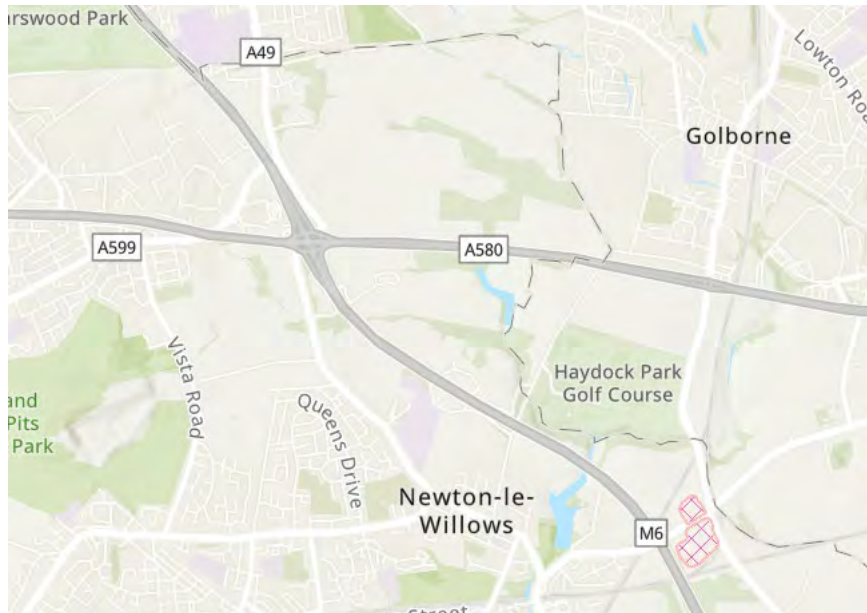


Figure A4.20 Historic Landfill Sites, ArgGIS Map viewer

Agricultural land grade

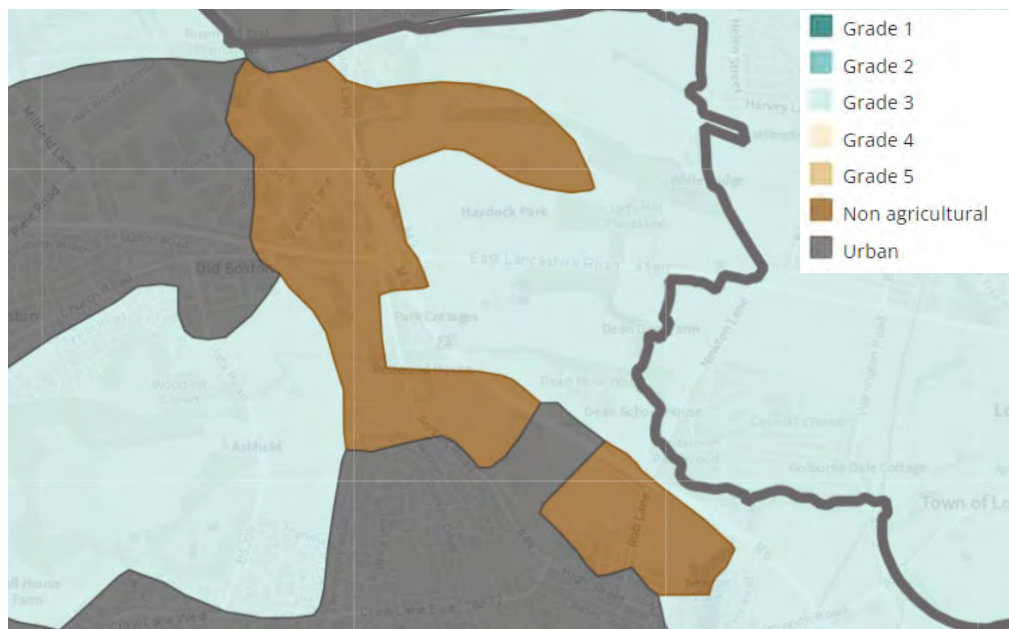


Figure A4.21 Agricultural Land Classification Extract MappingGM

Appendix 5 – Site 10, Highways Depot Rob Lane, South of Junction 23, M6



Figure A5.1: Site Location

Planning Criteria

Green Belt Status

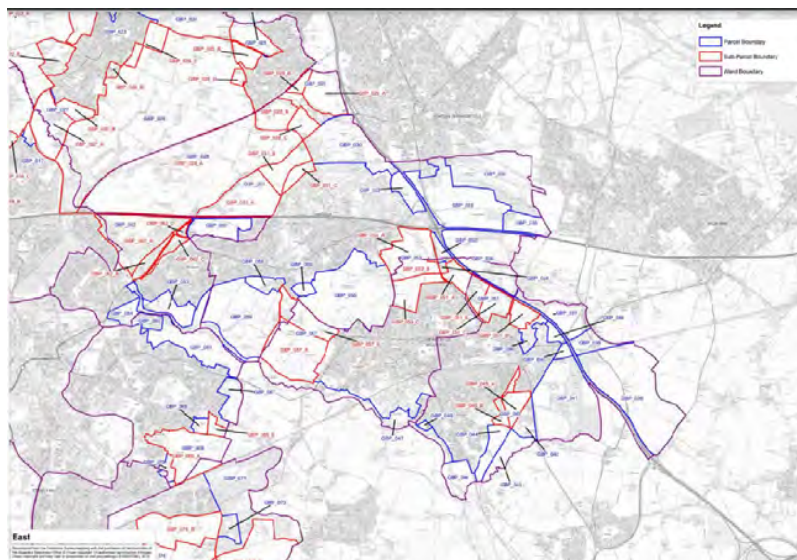


Figure A5.2 Parcel and Sub Parcel boundary Extract Appendix A Green Belt Review, December 2018

Parcel Ref	GBP_036
Name	Land south of A580 East Lancashire Road and south east of M6 Junction 23
Ward	Haydock, Earlestown
Sub-Parcels within Parcel	N/A
Size (hectares)	GBP_036: 73.57ha
Description	Large parcel lying to the south of the A580 East Lancashire Road and to the east of M6 Junction 23. The parcel contains dense protected woodland, agricultural land and buildings (Haydock Park Farm and Dean Dam Farm), a care facility, a brook and Highways England's North West Regional Control Centre.

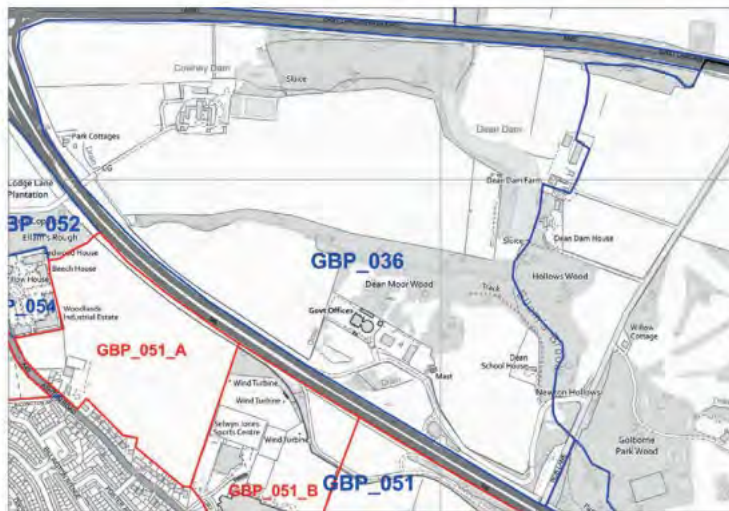


Figure A5.3 Parcel Overview Extract Green Belt Review, December 2018

STAGE 1B ASSESSMENT AGAINST GREEN BELT PURPOSES

Purpose 1 To check the unrestricted sprawl of large built-up areas		
Green Belt Parcel or Sub-Parcel	Findings	Green Belt Purpose 1 Score
GBP_036	<p>The parcel is dislocated from the urban area The north west boundary of the parcel lies approximately 650m from the western boundary of the large built-up area of Haydock, the western boundary of the parcel lies approximately from 370m from the large built-up area of Newton-le-Willows and the north eastern boundary lies approximately 170m from the large built-up area of Golborne.</p> <p>The parcel is bounded to the north by the A580 East Lancashire Road, to the east by protected woodland, to the west by the M6 and to the south in part by the M6 and Newton Lane. The parcel is therefore well contained. However despite the parcel's containment, the dislocation of the parcel from the urban area coupled with its large size and lack of strong boundaries within it, means that development of the parcel would likely lead to unrestricted sprawl.</p>	Medium

Purpose 2 To prevent neighbouring towns merging into one another		
Green Belt Parcel or Sub-Parcel	Findings	Green Belt Purpose 2 Score
GBP_036	The parcel forms part of a strategic gap between Golborne and Newton-le-Willows and in part between Haydock and Golborne. Development of the parcel would lead to a significant reduction in the gap between Golborne and Newton-le-Willows and between the south-eastern part of Haydock and the south-western part of Golborne.	High

Purpose 3 To assist in safeguarding the countryside from encroachment		
Green Belt Parcel or Sub-Parcel	Findings	Green Belt Purpose 3 Score
GBP_036	The parcel contains limited inappropriate development and consists mostly of agricultural land and protected woodland that create a countryside character. The M6 to the west and the A580 to the north have some impact on countryside character, but as you move away from these roads there are open views looking southwards, and on the edge of the parcel looking eastwards, that add to countryside character.	Medium

Overall significance of contribution to Green Belt Purposes	Comments	Score

GBP_036	Development of the parcel would lead to a significant reduction in the gap between Golborne and Newton-le-Willows and between the south-eastern part of Haydock and the south-western part of Golborne. The dislocation of the parcel from the urban area coupled with its large size and lack of strong boundaries within it, means that development of the parcel would likely lead to unrestricted sprawl.	High
---------	---	------

Carry forward to Stage 2 Assessment?	<p>Parcel GBP_036 continues to make a strong contribution to the purposes of Green Belt land. Given the high overall parcel scoring, ordinarily the recommendation would be for this parcel not to be carried forward to the Stage 2 assessment.</p> <p>However, a strategic aim of the emerging Local Plan is to provide sufficient land to meet local employment land needs in full, in order to ensure a strong and sustainable local economy. It is recognised in the Local Plan's emerging spatial strategy, that in order to meet employment land needs, land will need to be removed land from the Green Belt and allocated for employment development. In light of market evidence, the proposed spatial strategy is to largely focus new employment development on large sites capable of accommodating large scale employment opportunities, in close proximity to the strategic road network of the M6 and M62.</p> <p>Consequently, whilst it is acknowledged that there could be a high impact on the Green Belt if parcel GBP_036 were to be developed. Given the high level of importance given to providing sufficient employment land to meet employment land needs in full in the emerging Local Plan, coupled with the potential of the parcel to meet the size and locational requirements of the market, there are considered to be exceptional circumstances to justify carrying the parcel forward to the Stage 2 assessment.</p>	
--------------------------------------	--	--

Figure A5.4 Stage 1b Assessment, Extract from St Helens Green Belt Assessment, December 2018

- 4.4 Of the 69 parcels and sub-parcels which scored 'high' or 'high+', the majority were excluded from consideration at subsequent stages of the study. The only exceptions to this were parcels GBP_033, GBP_036 and GBP_039 which were kept in the study notwithstanding their 'high' or 'high+' scores for reasons which are set out below.
- 4.5 Parcels GBP_033 (land to the east of the M6, Junction 23) and GBP_036 (Land south of A580 East Lancashire Road and south east of M6 Junction 23) are located on the east side of the M6. Due to their contribution to the

strategic gap between settlements they score a 'high' at Stage 1B. However, they are fairly well contained. There is also strong evidence of developer interest in providing employment uses on these parcels, including the sub-regional demand for logistic uses (for which a current shortage of market-attractive sites has been identified). A strategic aim of the emerging Local Plan is to provide sufficient land to meet local employment land needs in full, by focusing new employment development on large sites in close proximity to the strategic road network of the M6 and M62. Having regard to a combination of these factors, parcels GBP_033 and GBP_036 were carried forward to Stage 2 notwithstanding their 'high' score at Stage 1B.

Figure A5.5 Extract Explanatory Text, Green Belt Assessment December 2018

<p>GBP_036 Land south of A580 East Lancashire Road and south east of M6 Junction 23, Haydock</p>	<p>73.4ha</p>	<p>Discount</p>	<p>This parcel was identified at Stage 1B as making a 'High' contribution to the Green Belt, but was not discounted at that stage to enable its potential to help meet needs for logistics development to be considered further. The parcel is, however, not suitable to be allocated or safeguarded for employment use due to various issues. Development within the parcel would be likely to have a substantial impact on highway capacity at Junction 23 of the M6 that immediately adjoins the parcel and suffers from significant capacity and congestion issues. Junction 23 is a strategically important junction on the highway network, linking the M6 and A49 with the A580 (that provides a major route between Liverpool and Manchester). A study has been commissioned by the Council to identify the nature and potential land take of any improvements that are required to the junction.</p> <p>The parcel contains a significant expanse of protected woodland that in turn would have an impact on the developable area, reducing the capacity to build appropriate logistics related development. The 2018 SA concluded that development of the sub-parcel would have a mixed impact on the achievement of SA objectives. The development of the parcel for employment use would be likely to harm the biodiversity interests within the site. It would also be likely to harm air quality, as the potential type of development on this sub-parcel would generate a significant amount of HGV vehicular movements within an AQMA.</p> <p>There is also an existing care and rehabilitation centre within the parcel (that would be incompatible with employment uses on the remainder of the parcel). Therefore, as adequate provision can be made elsewhere both for the Plan period and post-Plan period to meet employment needs this parcel is not recommended for allocation or safeguarding.</p>
--	---------------	-----------------	---

Figure A5.6 Table 5.2 Table 5.2: Results of Stage 3 for employment uses – allocate, safeguard or discount

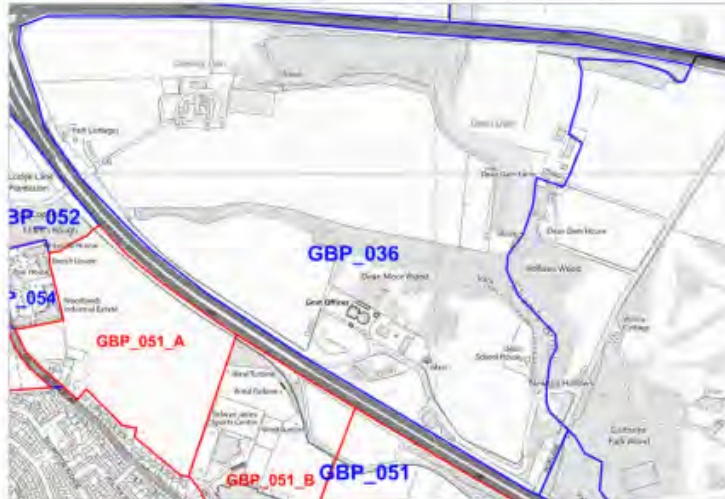
Table 5.1: Parcels/sub-parcels – overall score at Stage 3 for employment use

Parcel/Sub-parcel Ref.	Location	Stage 1B Score	Stage 2B Score	Overall Score	Notional capacity (hectares)
GBP_031a	Florida Farm North, Slag Lane, Haydock	Medium	Good	5	36.67ha
GBP_031b	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	Medium	Good	5	20.58ha
GBP_031c	Land to the west of Haydock Industrial Estate, Haydock	Medium	Good	5	7.75ha
GBP_032	Land to the east of Haydock Industrial Estate and to the west of M6 (north and south of Penny Lane), Haydock	Medium	Good	5	13.21ha
GBP_033	Land to the east of M6 Junction 23, Haydock	High	Good	3	55.90
GBP_036	Land south of A580 East Lancashire Road and south east of M6 Junction 23, Haydock	High	Limited	1	73.4ha

Figure A5.7 Extract of Table 5.1, Overall Score at Stage 2, Green Belt Assessment, December 2018.

STAGE 2B DEVELOPABILITY ASSESSMENT

Parcel Ref and Location	GBP_036 - Land south of A580 East Lancashire Road and south east of M6 Junction 23
Sub-parcels discounted at stages 1B or 2A	N/A
Area covered by stage 2B assessment	Whole parcel - 73.57ha



SUITABILITY

Landscape and visual character	<i>The landscape character type is Woodland Former Estate and the landscape character area is Haydock Park. The parcel has medium landscape sensitivity and medium visual sensitivity.</i>
Ecology	<i>The parcel contains two LWSs - Fox Covert including Cow Hey Dam (LWS44) to the north and Ellams Brook (LWS51) running through it. There is potential for protected species etc. to be present, so further Ecological Appraisal would be required in consultation with MEAS should the parcel be allocated for development.</i>
Agricultural Land Quality	<i>Part Grade 3 - good to moderate quality agricultural land; part Non-Agricultural.</i>
Heritage Assets	<i>A Listed Building lies to the south east. The potential impact of development on a Listing Building would need to be addressed.</i>
Flooding	<i>Part of the parcel lies within flood zones 2 (2%) and 3 (1.6%). Parts of the parcel fall within 30, 100, 1000year surface water flooding areas, with the most significant surface water 30-year flooding event experienced broadly following the water course of Ellam's Brook and around Dean Dam.</i>

Trees and Woodland	Significant parts of the parcel are designated protected woodlands. No Ancient Woodland.
Open Space and Recreation	No Open Space or Recreation Areas within the parcel. However, a small section of the parcel on the southern boundary adjoins a designated Amenity Greenspace.
Minerals	The parcel lies outside any proposed Mineral Safeguarding Area.
Infrastructure	The north-western side of the parcel falls within a Shell pipeline buffer zone.
Ground conditions	The parcel is not within 250m of an active or former landfill site. The parcel is not affected by any known sources of contamination. The parcel falls within the Coal Authority's 'Low Risk' area of known subsidence from the legacy of coal mining operations.
Air, water and noise pollution	The parcel (south and western boundaries) lies within an Air Quality Management Area Buffer zone (M6 corridor). The parcel is located within a Total Catchment (Zone 3) Groundwater Source Protection Zone.
Hazardous installations	There are no identified issues. The parcel is not located within a Health and Safety Executive consultation zone.
Neighbouring uses	Agricultural
Any other constraints	Surrounding highway network is congested on race days. Haydock Island experiences congestion issues. The parcel contains a TRUABI Rehabilitation Centre that offers support and rehabilitation to people with mental health issues, physical disabilities, sensory impairments etc. Any future development of GBP_036 would have to be sensitive to this neighbouring use.

TRANSPORT ACCESSIBILITY

Walking	The parcel is not within an 800m safe and convenient walking distance of a district or local centre. Nearest shops being Newton-le-Willows Local Centre.
Cycling	The southern section of the parcel falls within a 1 mile safe and convenient cycling radius of a local centre (Newton-le-Willows).
Public Transport	The parcel is not within 400m of a safe and convenient walk to a bus stop. The parcel is not within 800m walking distance of a train station.
Vehicular Traffic	Access could only be gained via the A580, which would be unacceptable. Currently St. Helens Council are carrying out a Transport Study at J23 of the M6 to identify what the required future enhancement and improvement requirements would be to address the existing capacity issues and potential future issues generated as a result of proposed growth for the Borough, the land requirements for that have yet to be defined.

AVAILABILITY

Ownership	Mixed Ownership: <ul style="list-style-type: none"> Part Peel Investments (North Ltd), represented by Turley (Call for
-----------	---

	<p>Sites form 2014_014)</p> <ul style="list-style-type: none"> Part unknown as site not promoted (Haydock Park Farm)
Existing use	Agricultural
Current planning status	Green Belt – no relevant planning history
Use(s) promoted by landowner(s)	Employment

ACHIEVABILITY

Viability Considerations	Parcel lies within EVA Zone 2. Parcel is considered viable for development.
Gross Developable Area	GBP_036 = 73.57ha (not excluding flood zone 3 or protected woodland which would significantly reduce the NDA)
Net Developable Area	As above
Notional Development Capacity	As above

CONCLUSIONS ON DEVELOPABILITY

<p>Summary of Developability Assessment</p>	<p>There are significant areas within the parcel that are protected woodlands and would need to be retained with buffer zones. Due to their locations within the parcel, they would reduce the NDA.</p> <p>The parcel contains a TRUABI Rehabilitation Centre that offers support and rehabilitation to people with mental health issues, physical disabilities, sensory impairments etc. Any future development of GBP_036 would have to be sensitive to this neighbouring use.</p> <p>Parts of the parcel are covered by an AQMA, and should the parcel come forward for development then AQMA issues would have to be addressed at planning application stage.</p> <p>There would be access and highway issues with this parcel, due to its proximity to the A580 and J23 that has known capacity issues.</p>
Preferred use (to be considered in stage 3)	Employment
Notional development capacity (to be considered in stage 3)	GBP_036 = 73.57ha
Developability Score	Limited Development Potential

Figure A5.8 Stage 2 Assessment, Stage 2B Assessment Green Belt Assessment, October 2020

Existing Use

Planning Policy Position.

Adopted Local Plan

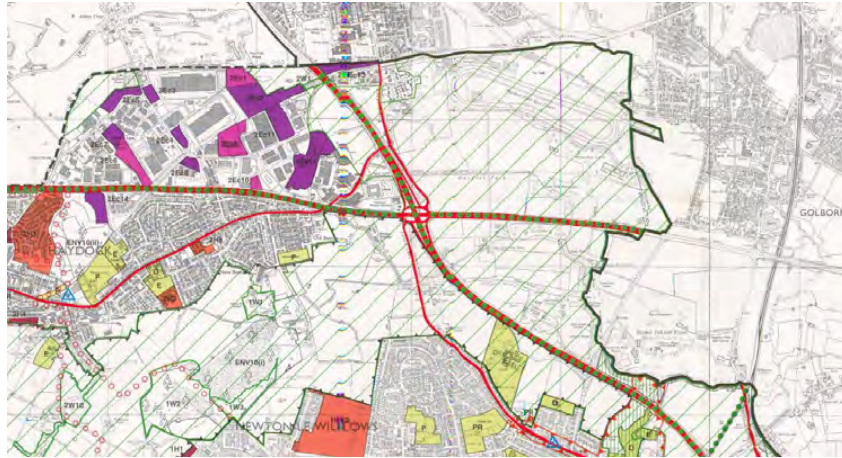
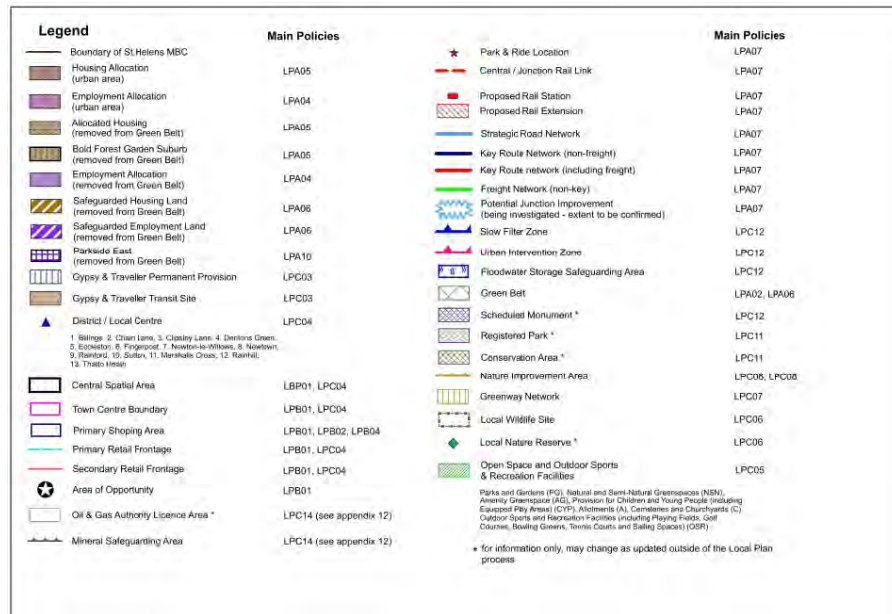


Figure A5.9 Extract of Adopted UDP Proposals Map South, July 1998.

Emerging Local Plan



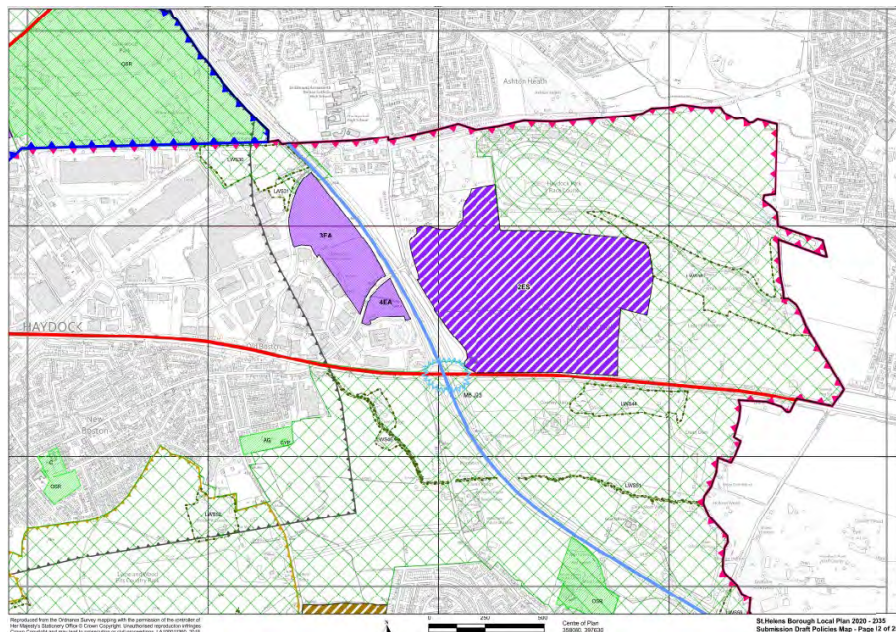


Figure A5.10 St Helens Local Plan Submission Draft Policies Map, January 2019

Impact on Heritage Assets

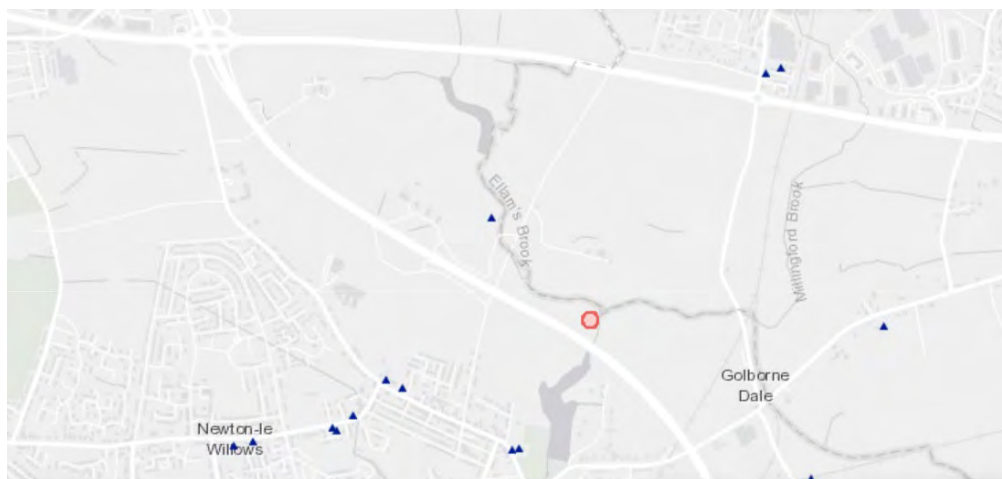


Figure A5.11 Listed Buildings, Structures and Scheduled Monuments. Source: Historic England
<https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

Environmental Considerations

Other Environmental Constraints

Flood Zone / Risk;



Figure A5.12 Extract EA Flood Map for Planning



Figure A5.13 Extract: EA Extent of Flooding: Surface Water Flooding

Ecology and Bio-diversity;

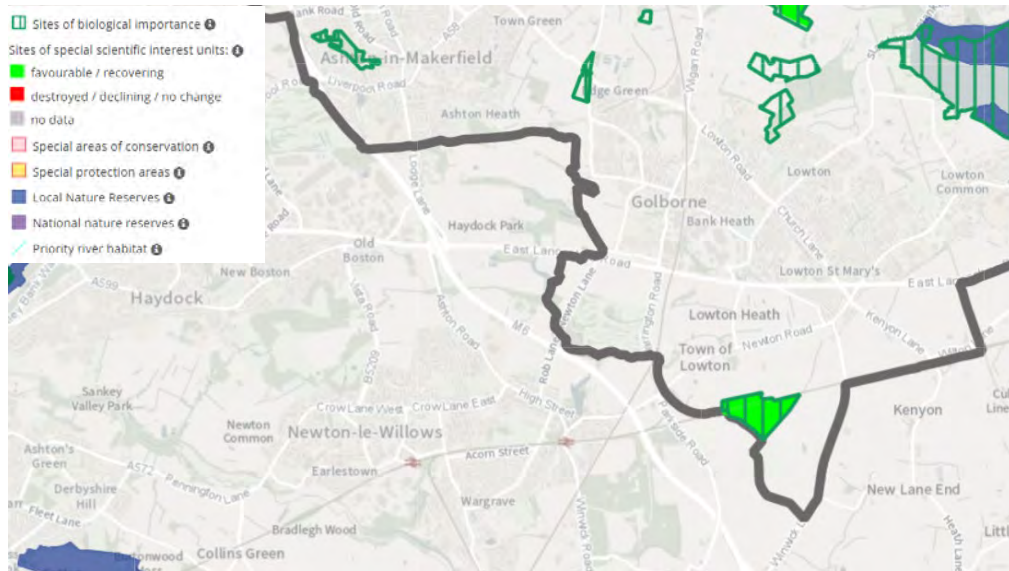


Figure A5.14 Sites of Biological Importance, SSSI's Local Nature Reserves Extract Mapping GM

NB. Refer to Local Plan Policies Map for Local Wildlife Sites.

Ground conditions;

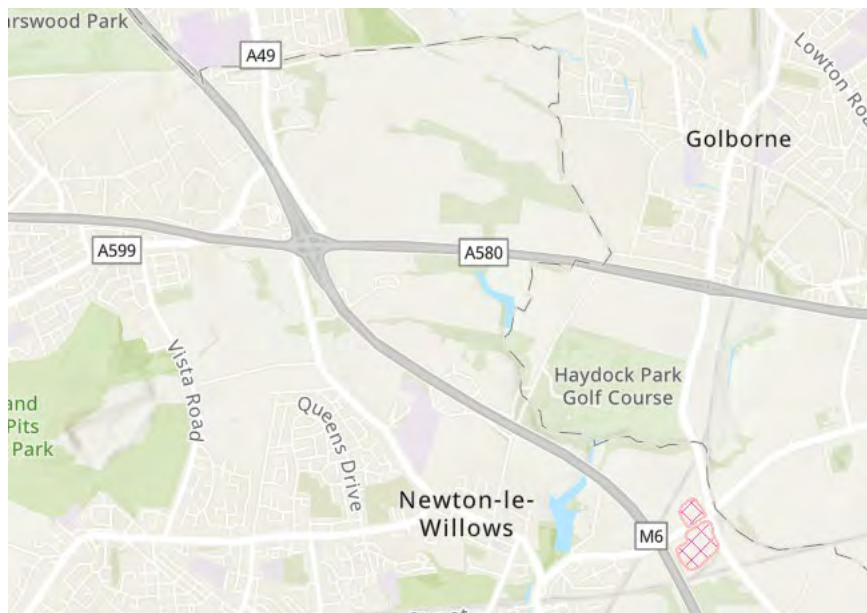


Figure A5.16 Historic Landfill Sites, ArgGIS Map viewer

Existing infrastructure

Agricultural land grade

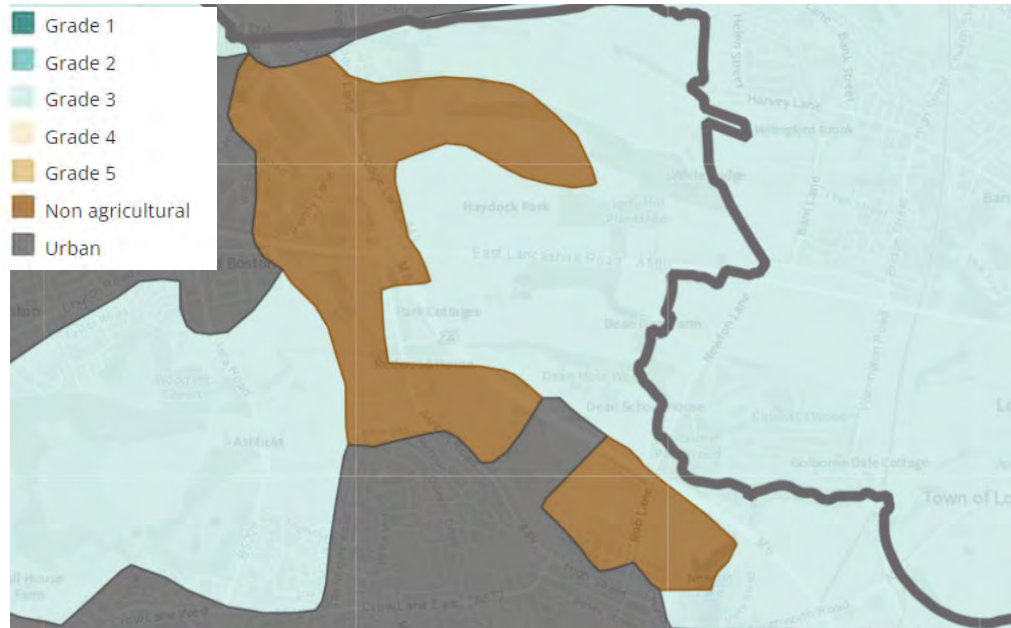


Figure A5.17 Agricultural Land Classification Extract MappingGM

Appendix 6 – Site I I, Junction 7/8 of the M56 Tatton



Figure A6.1 Site Location

Planning Criteria

Green Belt Status

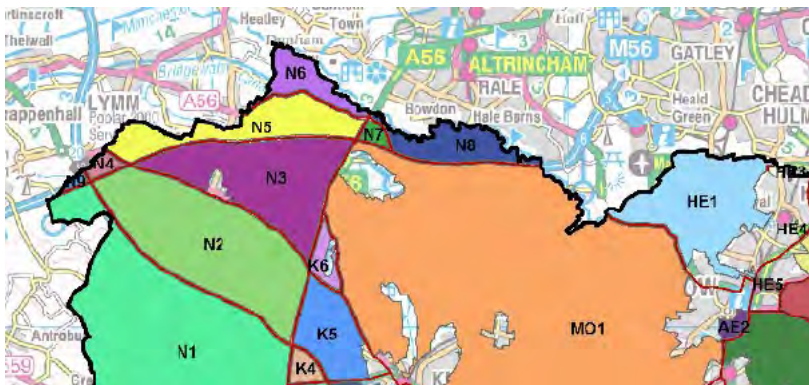


Figure A6. 2 Extract Figure 7.1 Map of General Areas for Green Belt in Cheshire East. Green Belt Assessment Update 2015 Final Consolidated Report

General Area	1 Check the unrestricted sprawl of large built-up areas	2 Prevent nearby towns from merging into one another	3 Assist in safeguarding the countryside from encroachment	4 Preserve the setting and special character of historic towns	5 Assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
N7	Contribution: the area makes some contribution in checking the unrestricted sprawl however given the adjacent areas consist of open land and there is no connection to the urban area, the contribution is limited. There are strong road boundaries on all sides to contain development.	No contribution: the general area does not make any contribution to preventing settlements from merging given that it is not located near to any settlements and is a very small area with comparatively larger general areas adjacent to it and adjacent to surrounding settlements.	Significant Contribution: the area makes a significant contribution to safeguarding the countryside from encroachment as it is well related to the countryside and is detached from any settlement. It protects a significant degree of openness of the Green Belt and the only urbanising influence present within the area is a farm. There are strong road boundaries on all sides to contain development. The area supports 3 beneficial uses of the Green Belt.	No contribution: the general area makes no contribution to the Green Belt purpose as it is not located near a historic town	No contribution: the general area makes no contribution to the Green Belt purpose as it is not located near an urban settlement	The area makes a limited contribution to the Green Belt given its function in safeguarding the countryside from encroachment as it protects a significant degree of openness, the only urbanising influence is a farm and it supports 3 beneficial uses of the Green Belt. The area makes a lesser contribution to checking the unrestricted sprawl of large built up areas given that there is no connection to the urban area. Given its size and location and the comparative role of other adjacent general areas, the area does not contribute to preventing nearby towns from merging. The area is not located near a historic town or an urban settlement and therefore makes no contribution to purpose 4 and 5.	Contribution
N8	Significant Contribution: the area makes a significant contribution in checking the unrestricted sprawl given the adjacent areas consist of Trafford Council's settlements of Altrincham, Bowdon and Hale Barns. However the administrative boundary which follows the River Bollin and is heavily wooded forms a strong northern boundary to the area which separates these settlements.	No contribution: the general area does not make any contribution to preventing settlements from merging given that the gap between Knutsford and Mablethorpe and the settlements in the neighbouring authority of Trafford is vast with other comparatively larger general areas in between providing separation. Furthermore the M56 maintains a strong boundary to the south of the area which provides separation.	Major Contribution: the area makes a major contribution to safeguarding the countryside from encroachment as it is closely related to Trafford Council being adjacent to Hale Barns and Bowdon to the north, albeit with separation provided by the River Bollin and wooded areas. The southern part of the area is well related to the countryside and the M56 road boundary will assist in preventing encroachment in the long term. Furthermore the area protects a significant degree of openness of the Green Belt with barely any urbanising influences. The area supports the beneficial uses of the Green Belt including retaining and enhancing landscapes, visual amenity and biodiversity.	No contribution: the general area makes no contribution to the Green Belt purpose as it is not located near a historic town	Significant contribution: Bowdon and Hale Barns are located to the north beyond the administrative boundary. Both settlements have 1.6% brownfield urban capacity for potential development and thus the general area makes a significant contribution to this purpose.	The area makes a major contribution to the Green Belt given its function in safeguarding the countryside from encroachment as it is closely related to the settlements of Hale Barns, Bowdon and Altrincham filling within Trafford Council's administration to the north, albeit with separation provided by the northern boundary of the River Bollin and wooded area. The area protects a significant degree of openness with barely any urbanising influences. The area makes a significant contribution to checking the unrestricted sprawl of large built up areas given this connection to Trafford Council's settlements. Given its location at the administrative boundary, the area does not contribute to preventing nearby towns from merging. The area is not located near a historic town and therefore makes no contribution to purpose 4. The area also makes a significant contribution to urban regeneration of Hale Barns and Bowdon.	Major Contribution

Figure A6.3 Extract Appendix A General Area Assessment Table

Existing Use

Planning Policy Position.

Adopted Policies Map

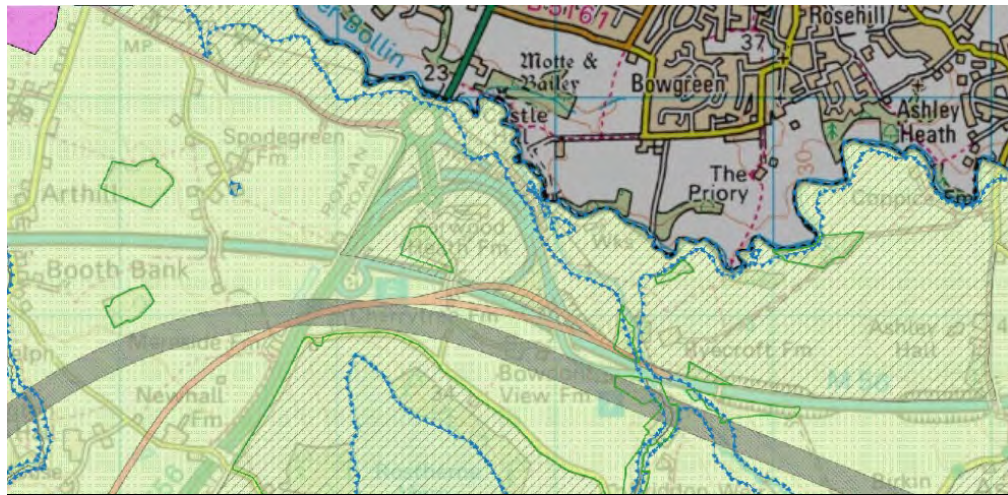
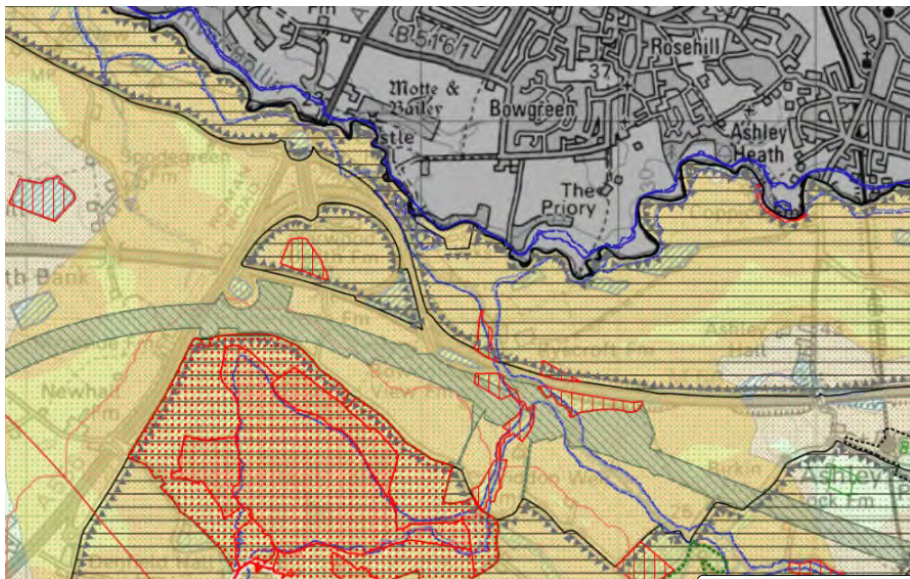


Figure A6.4 Extract Adopted Policies Map

Emerging Site Allocations and Development Policies DPD, Submission Version

- | | |
|---|--|
| <ul style="list-style-type: none"> Ramsar site Flood Zone 2 Flood Zone 3 Town centre boundary Principal town centre boundary Development areas/ character areas in and around town centres Mixed Use site Primary shopping area HS2 safeguarding zone Local landscape designations Open Countryside Peak District National Park Fringe Green Belt Employment site Jodrell Bank World Heritage Site Jodrell Bank Observatory consultation zone/World Heritage Site buffer zone Housing and employment site Housing site Areas of high sensitivity to wind energy development Sites of special scientific interest Gypsy, Traveller and Travelling Showpersons site Land reserved for future Railway Station Land reserved for infrastructure provision Local centre boundary | <ul style="list-style-type: none"> Local urban centre boundary Manchester Airport operational area Manchester Airport Noise Contours 2019 (Day) Manchester Airport Noise Contours 2019 (Night) Mixed Use (Strategic Location) Neighbourhood parade of shops Neighbourhood plans Protected informal open space Protected open space Safeguarded land Settlement boundaries Strategic employment areas Strategic green gaps Village infill boundaries Areas of Archaeological Potential Areas of Special Archaeological Potential Conservation Areas Local nature reserve Local Wildlife Sites National nature reserve Local geological sites Registered battlefields Registered parks and gardens Scheduled monuments Special Areas of Conservation |
|---|--|



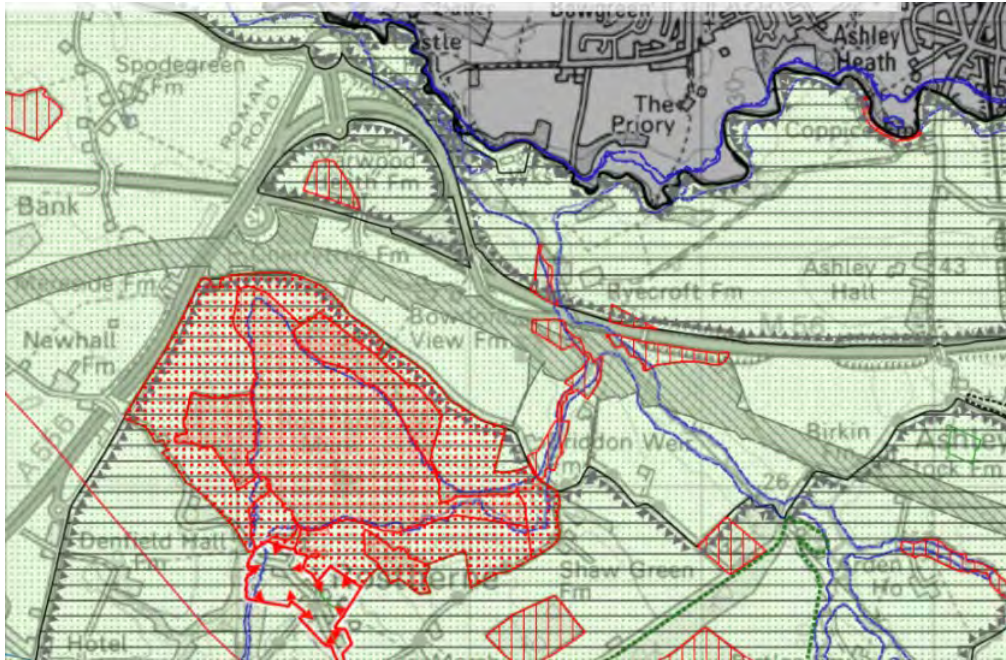


Figure A6.5 Extract Local Plan Draft Adopted Policies Map (Revised Publication Draft SADPD, 2020)

20. Whether the boundaries to the Local Landscape Designations (LLDs) are justified based on proportionate evidence, in particular to the Bollin Valley north of the M56 at Yarwood Heath Farm, and to the Peak Park Fringe east of Macclesfield

The evidence base supporting the designation of the LLDs comprises the Cheshire East Landscape Character Assessment (LCA) (2018)³⁶ and the Cheshire East

Local Landscape Designation (LLD) Review³⁷. Overall, the evidence is proportionate, explaining the special qualities of the landscapes contained within the LLDs, reflecting what can be observed in the field and justifying the boundaries shown on the Policies Map. The boundaries of the following two LLDs were discussed at the Hearing and I set out my comments on each below.

Bollin Valley LLD

Yarwood Heath Farm

The farm and its immediate surroundings sit at junctions 7 and 8 of the M56 with the A556 and are bounded by the motorway and its slip roads on all sides. The extent of slip road infrastructure has increased over time, and Yarwood Heath Farm is now cut off from the Bollin Valley immediately to the north, with footpath links having been severed by slip roads. However, the farm and its surrounding landholding continue to form part of the wider landscape of the Bollin Valley to the north of the M56. It's fields, woodland and isolated farm buildings contribute to the special landscape qualities of the LLD, as defined in the LLD Review, including the semi-natural, pastoral character and dispersed settlement pattern that typify the upper levels of the valley landscape. Whilst the tranquillity of the land around Yarwood Heath Farm is broken by the noise of traffic on the M56, the motorway and its wooded embankments serve to enclose the wider valley landscape to the south of the Bollin River at this point in its course. Whilst I agree with the decision to remove the slip road infrastructure from the LLD, I am satisfied that the landscape character and qualities of Yarwood Heath Farm justify its retention within the LLD. Retaining the farm and the landscape north of the M56 within the LLD boundary will also help to ensure that any development proposals within this area are properly considered in terms of their effect on the special qualities of the Bollin Valley landscape. Subject to the MMs discussed at the Hearing to incorporate the LLDs into Policy ENV 3, no changes to the boundary of the Bollin Valley LLD in this location are necessary for soundness.

Figure A6.6 Extract Cheshire East Local Plan SADPD Examination Inspector's Post Hearing Comments on Key Issues, January 2022

Impact on Heritage Assets



Figure A6.7 Listed Buildings, Structures and Scheduled Monuments. Source: Historic England
<https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

Relevant Planning History –

ES Scoping 20/4877S - Responses

Environmental enhancement

The proposed development is within an area that Natural England considers important as part of a landscape scale network of wetland habitats that act as stepping stones for wildlife. As such, Natural England would encourage the protection and enhancement of wetland habitats and associated terrestrial habitats into this development which can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. We strongly encourage you to share this advice with the applicant to maximise opportunities to incorporate green infrastructure and biodiversity enhancements during the development of the detailed proposal. The development provides opportunities to secure biodiversity net gain for nature and local communities, as outlined in paragraphs 9, 109 and 152 of the NPPF

Figure A6.8 Extract from Response from Natural England: Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): Proposed Motorway Service Area development Location: Tatton Services between Junctions 7 & 8 of the M56. 23rd November 2020

“The document outlines that the farm buildings associated with Yarwood Heath Farm are seen on the 1847 Tithe map of the area, these buildings are extant throughout the first, second and third editions of the OS Maps for this area, with little alterations to the footprints over that time. In chapter 4.10.14 the document outlines that there may be significant archaeological deposits on the site, first recorded during the evaluation works of the A556 in 2015. These features include medieval water management and Iron working evidence, along with Roman artefacts being recovered.”

Figure A6. 9 Extract Response to 20/4877S ES from Cheshire Archeology PAS, September 2020

Thank you for consulting Highways England in relation to the EIA Scoping Opinion for the proposed MSA facility at Tatton.

Given the proximity and the direct impact that this proposal will have on the Strategic Road Network, Highways England expect to see a robust Transport Assessment in support of this application. Highways England have had some pre-app discussions with the developer in relation to this proposal, in particular around the modelling required to support their application. Highways England have concerns around the suitability of the access and egress arrangements for the facility (in particular in relation to highway Safety as well as the impact to journey times through the area), particularly given the proximity to the existing slip road configuration at M56 J7. We will continue to liaise with the developer in relation to these proposals.

Figure A6. 10 Extract Response to 20/4877S ES from Highways England (now National Highways), November 2020

Engineering, Safety and Operational Issues

Highways Engineering / The ability of a site to provide safe access

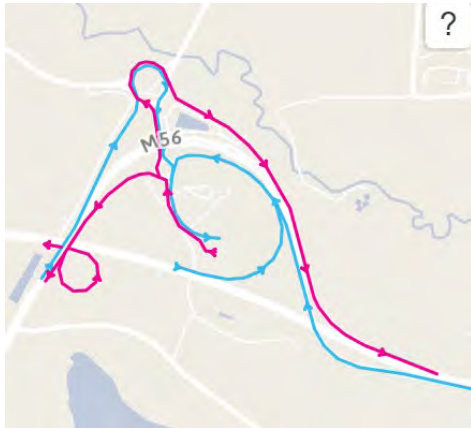


Figure A6.11 Extract: <https://my.engaged.space/tattonservices/#chapter-3>

Thank you for consulting Highways England in relation to the EIA Scoping Opinion for the proposed MSA facility at Tatton.

Given the proximity and the direct impact that this proposal will have on the Strategic Road Network, Highways England expect to see a robust Transport Assessment in support of this application. Highways England have had some pre-app discussions with the developer in relation to this proposal, in particular around the modelling required to support their application. Highways England have concerns around the suitability of the access and egress arrangements for the facility (in particular in relation to highway Safety as well as the impact to journey times through the area), particularly given the proximity to the existing slip road configuration at M56 J7. We will continue to liaise with the developer in relation to these proposals.

Figure A6.12 Extract Response to 20/4877S ES from Highways England (now National Highways), November 2020

Environmental Considerations

Other Environmental Constraints

Flood Zone / Risk;

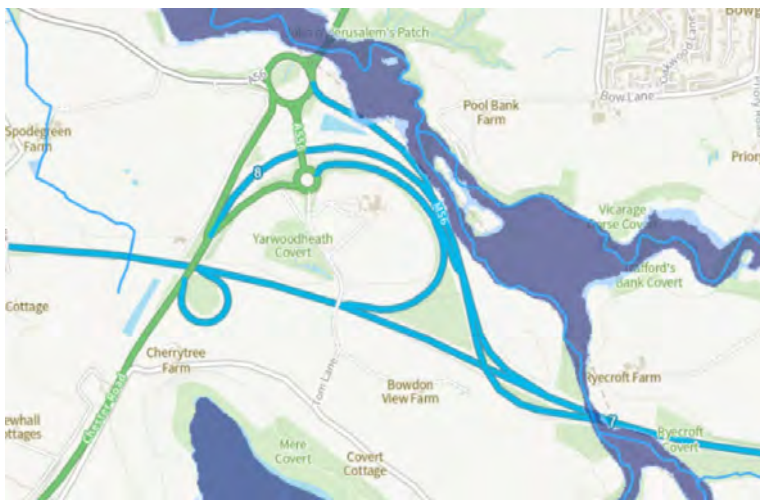


Figure A6.13 Extract EA Flood Map for Planning

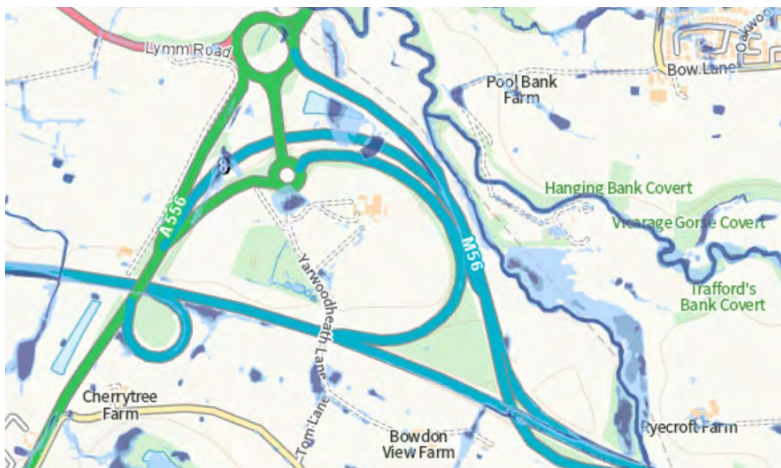
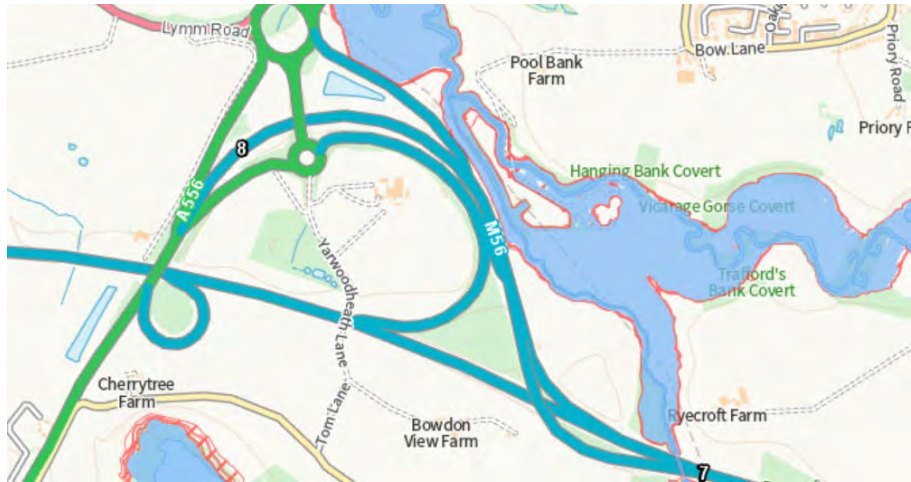


Figure A6.14 Extract EA Extent of Flooding Surface Water Flooding



Maximum extent of flooding from reservoirs:

● when river levels are normal
 ● when there is also flooding from rivers

Figure A6.15 Extract EA Extent of risk of Flooding from Reservoirs.

Ecology and Bio-diversity;

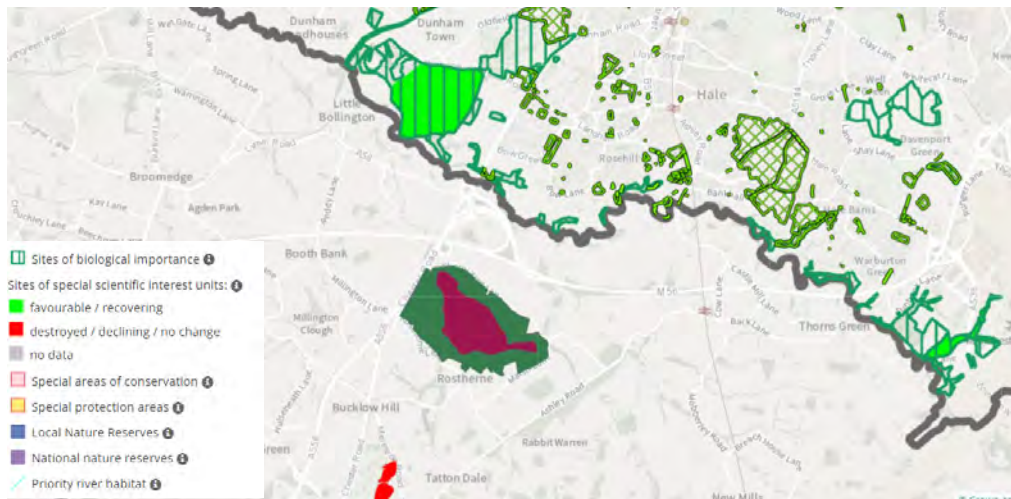
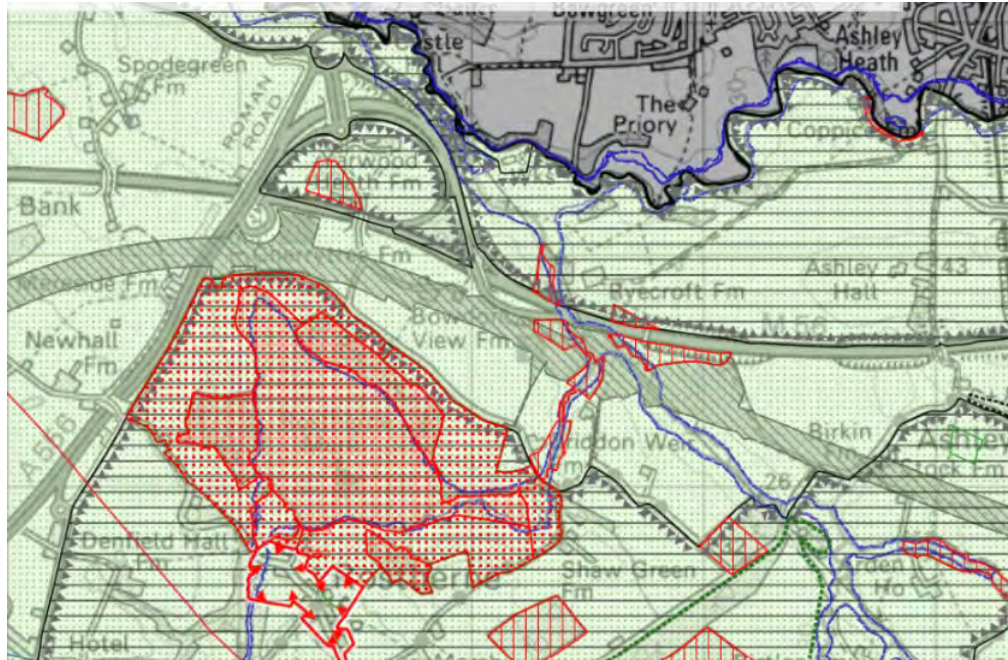


Figure A6.16 SSSI, SAC's, Sites of Biological Importance, National Nature Reserves, Extract Mapping GM



- | | |
|---|--|
| <ul style="list-style-type: none"> Ramsar site Flood Zone 2 Flood Zone 3 Town centre boundary Principal town centre boundary Development areas/ character areas in and around town centres Mixed use site Primary shopping area HS2 safeguarding zone Local landscape designations Open Countryside Peak District National Park Fringe Green Belt Employment site Jodrell Bank World Heritage Site Jodrell Bank Observatory consultation zone/World Heritage Site buffer zone Housing and employment site Housing site Areas of high sensitivity to wind energy development Sites of special scientific interest Gypsy, Traveller and Travelling Showpersons site Land reserved for future Railway Station Land reserved for infrastructure provision Local centre boundary | <ul style="list-style-type: none"> Local urban centre boundary Manchester Airport operational area Manchester Airport Noise Contours 2019 (Day) Manchester Airport Noise Contours 2019 (Night) Mixed Use (Strategic Location) Neighbourhood parade of shops Neighbourhood plans Protected informal open space Protected open space Safeguarded land Settlement boundaries Strategic employment areas Strategic green gaps Village infill boundaries Areas of Archaeological Potential Areas of Special Archaeological Potential Conservation Areas Local nature reserve Local Wildlife Sites National nature reserve Local geological sites Registered battlefields Registered parks and gardens Scheduled monuments Special Areas of Conservation |
|---|--|

Figure A6.17 Extract Emerging Local Plan Draft Adopted Policies Map (Revised Publication Draft SADPD, 2020)

Ground conditions;

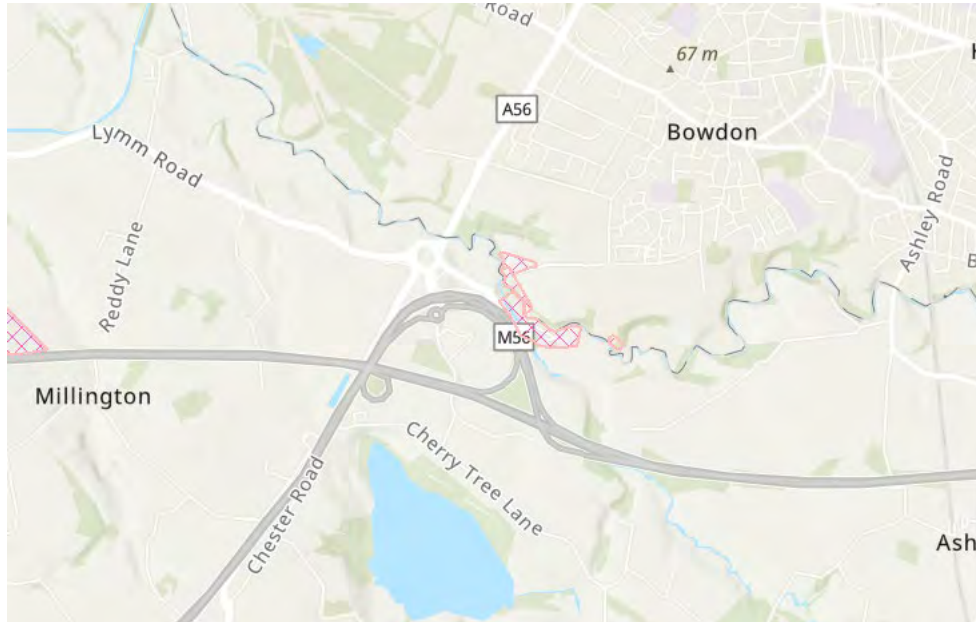


Figure A6.18 Historic Landfill Sites, Arc GIS Map Viewer

Existing infrastructure;

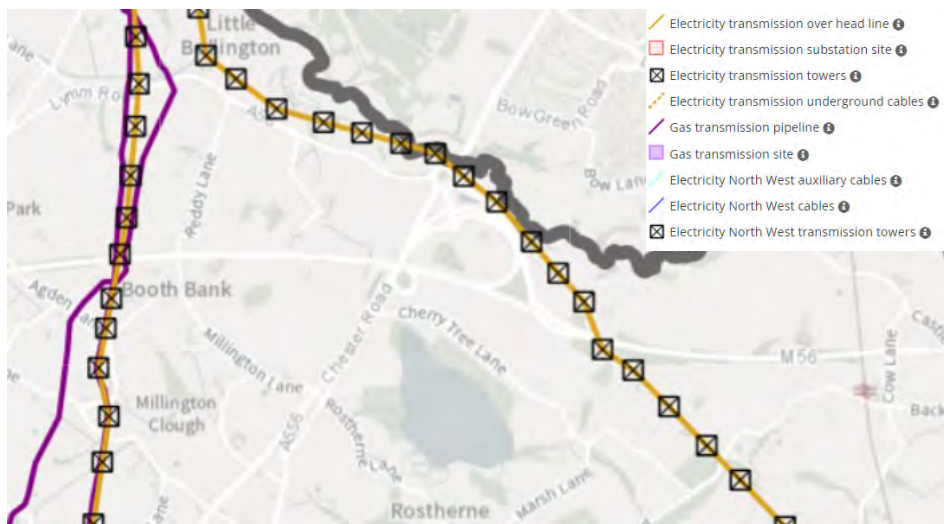


Figure A6.19 Existing Overhead Pipelines and Pylons, COMAH Sites, Transmission Pipelines
Extract Mapping GM

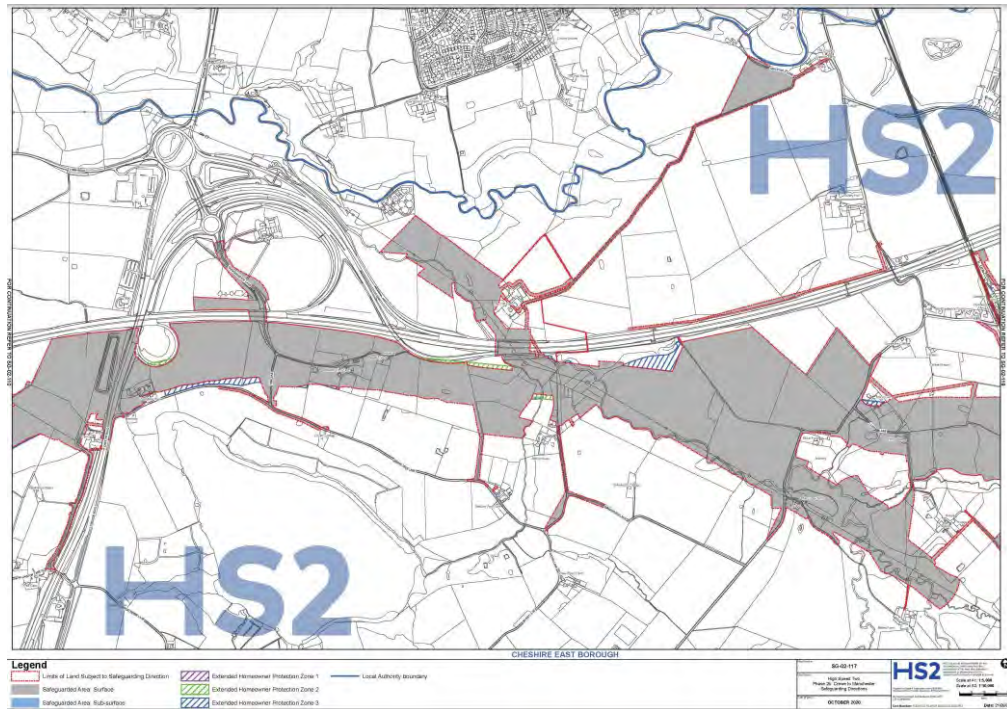


Figure A6.20 Extract High Speed Two Safeguarding Directions, October 2020 Cheshire West and Chester

3.2.19 For these reasons, it is not considered that HS2 Phase 2b or Northern Powerhouse Rail are "*existing or approved projects*" or "*reasonably foreseeable*" in the context of EIA and future cumulative impacts of these schemes with the Proposed Development are not proposed to be assessed within the ES. Notwithstanding this however, the MSA proposals will ensure that these projects are not precluded from coming forward, to the best of the knowledge of the projects at the time. The applicants intend to liaise with HS2 throughout the progress of the MSA proposals to ensure this compatibility

Figure A6.20a Extract Environmental Impact Assessment: Scoping Report, Pegasus October 2020, 20/4877S

Agricultural land grade

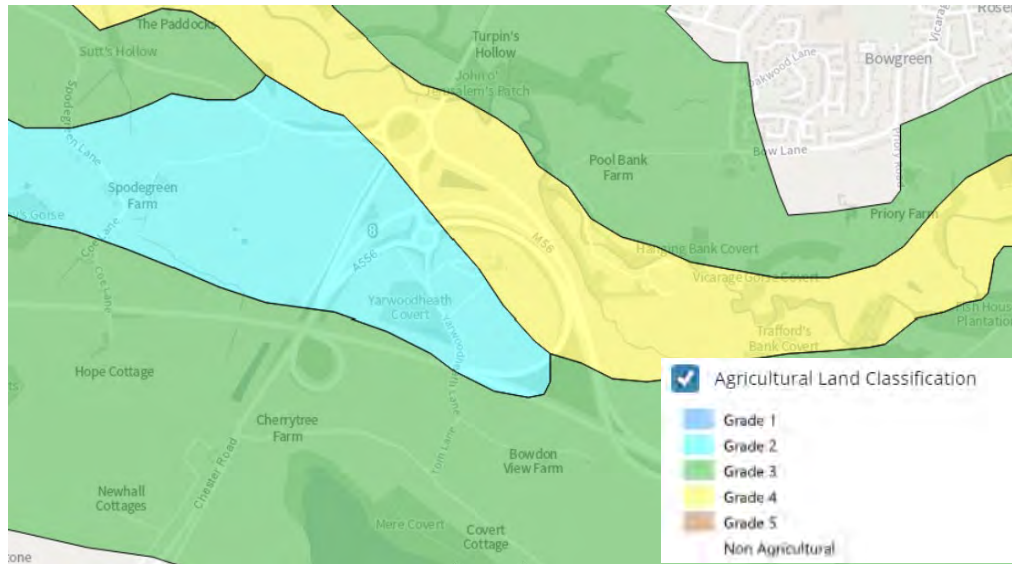


Figure A6.21 Agricultural Land Classification, Extract Mapping Warrington

DR06 - Summary of Assessment Note on the Need for Alternative Fuels

File Note

Project title M62 Warrington MSA
Job number 279479-03
File reference
cc
Prepared by Tom Corke
Date 18 February 2022
Subject Review of the position on alternative fuel provision need at the proposed M62 Warrington MSA

Blythe Gate Blythe Valley Park Solihull West Midlands B90 8AE United Kingdom
t +44 121 213 3000 d +44 121 213 3845
arup.com

Introduction

This technical note has been prepared on behalf of Extra MSA Warrington Limited (“Extra”) to support the need case for the proposed MSA development at M62 Warrington MSA. It should be read in conjunction with the letter from Spawforths to Warrington Borough Council titled “response to questions raised by members of planning committee” and dated 8th January 2021.

Warrington MSA is a proposed Motorway Service Area (MSA) development located at M62 Junction 11. Access would be taken from a new arm on the north side of the existing roundabout. The development has been subject to a planning application which was refused by the Local Planning Authority (LPA) and is now in the planning appeal process.

In order to address third party criticisms of the need case for Warrington MSA, Extra have appointed Arup to provide context to the need position for alternative fuels at the proposed development site.

The transition to ultra-low emission vehicles is an important part of the transition to a Net Zero, low carbon transportation network. The transition will result in reduced greenhouse gas emissions and assist in improving air quality near the Strategic Road Network (SRN).

National policy position

In November 2020, the Department for Transport (DfT) announced¹ that sales of new petrol and diesel cars would end by 2030, and that sales of only new zero tailpipe emission vehicles would be permitted from 2035. This step will help to decarbonise UK car journeys by reducing tailpipe emissions of the vehicle fleet, accelerating the transition to low emission and ultra-low emission vehicles in the meantime.

¹ <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

Job number 279479-03
Date 18 February 2022

The Climate Change Committee 6th Carbon Budget published in 2020² states that “a network of rapid charge points (in particular along the strategic road network) will enable users to recharge reliably during longer journeys. Companies such as Ecotricity already provide a network of individual chargers at motorway service stations, while Gridserve is due to open the UK’s first electric forecourt later this year [2020]. Our scenarios anticipate the installation of 8,000-15,000 chargers in interurban locations by 2030, rising to 10,000-20,000 by 2040.”

The Society of Motor Manufacturers and Traders (SMMT) announced³ on 5th October 2021 that despite a fall in new car registrations in September 2021 and the weakest September sales performance since before the twice-annual registration plate change was introduced, sales of Battery Electric Vehicles (BEV) increased by 49.4% over 2020 and almost as many BEV were sold in September 2021 as during the whole of 2019. Sales of Plug-in Hybrid Electric Vehicles were also up by 11.5% year-on-year. This demonstrates the increasing prevalence of plug-in electric vehicles, both hybrid and full EV, currently using UK roads. The provision of appropriate charging facilities is therefore not only required to support the long-term aspirations to change the UK vehicle fleet to zero emission vehicles but also to support the safety and needs of travellers using the Motorway network today. This will support driver confidence in using a BEV for a long-distance journey and counter the ‘range anxiety’ mindset.

The availability of an effective and resilient charging network is a necessity to ensure that re-charging opportunities are available where they are needed by road users.

National Highways (formerly Highways England) published their Net Zero Highways strategy⁴ in July 2021. The strategy incorporates measures to reduce corporate emissions, maintenance and construction emissions and road user emissions. The strategy includes measures to improve availability of vehicle charging:

- To publish a blueprint for EV charging services and energy storage by 2023;
- Develop a preferred investment plan for HGV charging by 2028, in preparation for Roads Period 4 (2030-2035) implementation.

The National Highways stated priority is to help roll out solutions to decarbonise HGVs and support the uptake of electric cars and vans.

DfT Circular 02/2013⁵ sets out the policy context for MSAs. Paragraph B36 states that “*operators of roadside facilities are encouraged to provide refuelling facilities for low emission vehicles, including recharging facilities for plug-in vehicles and other arrangements that meet the needs of emergent low carbon and alternative fuel technologies as appropriate, such as gas refuelling stations.*”

² <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Surface-transport.pdf>

³ <https://www.smmt.co.uk/2021/10/battery-electric-vehicles-power-on-despite-supply-issues-bedevilling-new-car-market/>

⁴ <https://highwaysengland.co.uk/netzerohighways/>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/237412/dft-circular-strategic-road.pdf

Job number 279479-03
Date 18 February 2022

This demonstrates that even when the Circular was published in 2013, before the widespread availability of EVs, it was recognised that MSAs can provide an important role in providing refuelling opportunities for low emission vehicles. It is also now clear that the need for this provision has increased substantially since 2013.

In addition, in the Roads Investment Strategy 1 (RIS 1) period Highways England made a carbon reduction commitment to ensure “that 95% of the Strategic Road Network (SRN) will have a charging point every 20 miles”.⁶ HE funded the initial rollout of such infrastructure between 2019-2021.

Despite this rollout, Government considered that this provision would be insufficient to reduce range anxiety across England’s SRN and focused the next policy and budget effort on supporting further rollout of ultra-rapid charging points. Government confirmed that “extensive public charging infrastructure across our motorways and major A roads is a key part of this transition.”⁷

A Rapid Charging Fund was announced⁸ in the March 2020 budget. The fund will provide public support to upgrade or build grid connections for electricity supply to ensure that power is available at MSAs to support the continued growth of EV charging points along the SRN in England. Government allocated £950m to the Rapid Charging Fund in November 2020 Spending Review⁹, which is also a key driver in the Green Transport pillar of the Green Recovery Plan and the 2021 Transport Decarbonisation Plan of the DfT¹⁰. This indicates that en-route charging on motorways is a policy priority for the UK Government in delivering Net Zero. MSAs are seen as a natural fit to host these EV charging hubs as they are already viewed as hubs by drivers and the customer dwell time fits with the charging patterns for EVs.

This will help to ensure that by 2023, there will be a minimum of 6 high powered, open access charging points (150-350kW) at every MSA in England with some sites have a higher number. By 2030, the target is to have around 2,500 high powered charging points available on the English SRN and increasing to 6,000 for 100% EV fleet in England.

Local policy position

Warrington Borough Council (WBC) have published their response¹¹ to the climate emergency on their website and have developed plans and targets to define, shape and guide their work to become carbon neutral by 2030.

⁶ https://highwaysengland.co.uk/media/hmmnne4n/strategic_report-1509.pdf, p. 59

⁷ <https://www.gov.uk/government/publications/government-vision-for-the-rapid-chargepoint-network-in-england/government-vision-for-the-rapid-chargepoint-network-in-england>

⁸ <https://www.gov.uk/government/publications/government-vision-for-the-rapid-chargepoint-network-in-england/government-vision-for-the-rapid-chargepoint-network-in-england>

⁹ <https://www.gov.uk/guidance/rapid-charging-fund>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

¹¹ <https://www.warrington.gov.uk/our-climate-emergency-plans-and-targets>

Job number 279479-03
Date 18 February 2022

Among the six key areas identified for action are a reduction in greenhouse gas emissions and increasing security of energy supplies. The Green Energy Strategy identifies electric vehicles as a key technology to facilitate a reduction in carbon emissions.

WBC published a draft Warrington electric vehicle strategy in March 2021. This sets out a range of short-, medium- and long-term measures to increase adoption of electric vehicles in the borough. Proposed measures include providing charging facilities for taxis in convenient locations, providing charging infrastructure for buses, providing charging points at key destinations such as town centre, stations, retail parks and employment areas.

One of the long term objectives is to support the transition of HGVs to electric, but which notes that the technology required is still under development and may not be deliverable, and that alternative solutions such as hydrogen fuel should be considered.

The approach taken by WDC confirms that adoption of ultra-low emission vehicle technology is a key component of the local environmental strategy, and that investment in further EV charging facilities within the borough area is required to support this change.

In relation to funding of the Green Energy Strategy refer to the need for external funding from central Government and commits to seek external grants and funding to drive the Energy Strategy forwards.

Private sector and developer contributions are likely to form a significant part of the external funding opportunities to improve EV charging infrastructure.

Hydrogen fuel

The UK Hydrogen Strategy¹² was published on 17th August 2021. The strategy sets out a plan for the production, storage, transportation and use of hydrogen as a fuel in industry, buildings, power and transport.

In transport, the principle use of hydrogen is expected to be heavy vehicles such as buses and goods vehicles, providing a direct substitute for carbon-based fuels. The Government expects hydrogen to perform a key role in decarbonising the transport sector and by 2030 to be in use across a range of transport modes.

The UK Hydrogen Strategy states: *“Large long-haul HGVs are the most challenging segment of the road sector for developing zero emission options due to their long journey distances and heavy payload requirements. Some vehicles are in constant use and therefore require fast refuelling to meet operational requirements.”* This highlights the reasons why hydrogen is considered likely to be a more realistic fuel solution for heavy transport vehicles.

The Climate Change Committee 6th Carbon Budget published in 2020¹³ states that *“hydrogen offers the closest user experience to current diesel operations. Given sufficient hydrogen refuelling*

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1011658/6-7515_BEIS_UK-Hydrogen-Strategy_017-Print-content.pdf

¹³ <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Surface-transport.pdf>

Job number 279479-03
Date 18 February 2022

infrastructure, fleet operators would be able to fill up vehicles either in-depot or from filling stations en route as currently, or both. Hydrogen is also a particularly attractive solution for vehicles requiring longer independent range.” Analysis by Ricardo¹⁴ suggests that by 2050 around 500-600 hydrogen refuelling stations would be required to support the use of hydrogen by larger HGVs only. If smaller vehicles were to use hydrogen in preference to electrification, this could increase to around 1,000.

On 17th October 2021, Ineos published a vision¹⁵ for hydrogen fuel, with support for hydrogen fuel for heavy transport vehicles where electric battery capacity is more technically challenging than for light vehicles. Ineos highlight the disparity between Germany and the UK, where there is a significant difference in the scale of hydrogen refuelling stations and the associated commitment of vehicle manufacturers to promote and sell hydrogen fuel cell vehicles. Ineos calls for the UK Government to invest in supporting the infrastructure needed to increase the viability of hydrogen fuel cell vehicles on the UK network.

ITM power currently operate small hydrogen refuelling facilities on behalf of Shell at two Extra MSA locations. ITM have also developed a prototype hydrogen refuelling station which can produce hydrogen fuel on site for refuelling vehicles. This approach eliminates the need to transport the fuel to the refuelling station, as would be required for a traditional HGV fuel filling station. The prototype demonstrates that hydrogen refuelling for heavy transport is feasible, and can be developed into a commercial model as increasing volumes of hydrogen fuelled HGVs come onto the market and into the UK fleet. This will be fully in line with the UK Hydrogen Strategy.

Warrington MSA

The proposed development is located on the M62 at junction 11. This location is sited on four existing gaps in MSA provision as identified in the Review of Strategic Road Network Service Areas study published by Highways Agency in January 2010. The report highlights the following gaps in provision:

- M6 Charnock Richard services to M62 Birch services (35 miles);
- M6 Charnock Richard services to M67 Terminus (47 miles);
- M58 Terminus to M62 Birch services (40 miles); and
- M58 Terminus to M67 Terminus (52 miles).

In addition, the site is located on the following gap:

- M6 Knutsford services to M62 Birch services (31 miles)

The proposed MSA site is located in proximity to the following adjacent existing MSAs:

¹⁴ Ricardo for the CCC (2019), Zero emission HGV infrastructure requirements

¹⁵ [Hydrogen, the dream fuel \(ineos.com\)](https://www.ineos.com/press-releases/2021/10/17/ineos-reveals-its-vision-for-hydrogen-fuel)

Job number 279479-03
Date 18 February 2022

- M6 Charnock Richard services (19 miles);
- M56 Burtonwood services (6 miles);
- M6 Lymm Truck stop (9 miles);
- M6 Knutsford services (15 miles); and
- M62 Birch services (16 miles).

As set out in the letter from Spawforths to Warrington Borough dated 8th January 2021, the Warrington MSA provision is proposed to include a facilities building, fuel filling station and parking for cars, HGVs and coaches. This includes a commitment to a minimum of 6 EV charging points at opening with future proofed provision to increase this to 50 charging points to match market demand.

The proposed Warrington MSA will fit with the Government's RIS1 policy to provide EV charging opportunities at 20 mile intervals along the SRN, with MSAs playing a key role in the availability of charging points alongside their road user safety and welfare role. The proposed site is located 19 miles from Charnock Richard services, 15 miles from Knutsford services and 16 miles from Birch services. It will provide an additional EV charging facility along the existing gaps between Charnock Richard and Birch services, and between Knutsford and Birch services.

Extra have also included potential for provision of hydrogen fuel if there is sufficient demand, similar to existing hydrogen fuel provision at their M25 Cobham and M40 Beaconsfield service areas.

The development would also provide further fast charging EV capacity in the borough and at a key transport node in accordance with the WDC draft Warrington electric vehicle strategy. While the MSA would not be considered a destination for local residents, it will provide additional resilience locally, and reduce the likelihood of drivers leaving the SRN to find a charger within the borough. The MSA could also help to introduce hydrogen fuel for HGVs in the borough, accelerating the opportunity to adopt hydrogen fuel for goods traffic originating or arriving in Warrington.