

Development Plan Representation

Warrington Local Plan: 2021- 2038: Submission Version

On behalf of Langtree Property Partners

November 2021



I. Introduction

- I.1. Spawforths have been instructed by Langtree Property Partners to submit representations to the Warrington Local Plan 2021-2038: Proposed Submission Version Plan, for their sites at Grappenhall Lane, Knutsford Road and Arley Road.
- I.2. Langtree welcomes the opportunity to contribute to the emerging Local Plan for Warrington and is keen to further the role of the Borough within Cheshire and the Liverpool and Manchester City Regions.
- I.3. Langtree has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda.
- I.4. Langtree would like to make comments on the following topics and sections in the Submission Draft Plan:
 - General Comments
 - Vision and Objectives
 - Policy DEV1: Housing Delivery
 - Policy DEV2: Meeting Housing Needs
 - Policy DEV4: Economic Growth and Development
 - Policy GB1: Green Belt
 - Policy INF5: Delivering Infrastructure
 - Policy ENV7: Renewable and Low Carbon Energy Development
 - Policy ENV8: Environmental and Amenity Protection
 - Policy MD6: The South East Warrington Employment Area
 - Policy MI: Local Plan Monitoring and Review
 - Omission Site: Knutsford Road, Six 56 Phase II
 - Omission Site: Arley Road, Appleton Thorn
- I.5. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- I.6. Langtree welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public.
- I.7. We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- I.8. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2. National Planning Policy Context and Tests of Soundness

- 2.1. The Government's core objectives as established through the 2021 National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2021 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2021 Framework is to create the conditions for sustainable economic growth and to deliver a wide choice of high quality homes and well-designed places.
- 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework state that Local Plans are the key to delivering sustainable development which reflect the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. Paragraph 22 is clear that Strategic Policies should look ahead over a minimum 15 year period, and where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the areas strategy, then policies should look ahead over a period of at least 30 years.
- 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that:
- 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound'. Plans are 'sound' if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant

- 2.5. This document therefore considers the content of the Submission Local Plan consultation document on behalf of Langtree in light of this planning policy context.

3. General Comments

- 3.1. Langtree **supports** the emerging Warrington Local Plan, however Langtree **considers** that some elements of the Plan should be updated to better reflect national policy and guidance.

Justification

- 3.2. Langtree **supports** the ambition of the emerging Warrington Local Plan, which identifies their site at Grappenhall Lane (Six 56) as part of the South East Warrington Employment Allocation (Policy MD6).
- 3.3. However, Langtree **considers** that certain aspects of the emerging Plan do not reflect national planning policy, including the approach towards safeguarded land for long term development and the approach towards housing allocations in the Outlying Settlements. It is difficult to understand from the evidence base how the Council has determined the approach towards safeguarded land and the housing allocations in the Outlying Settlements. This will be explored in further detail within these representations.
- 3.4. Furthermore, Langtree considers that the Local Plan period is insufficient. The 2021 Framework indicates that where “larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. Langtree is aware that the emerging Local Plan includes an analysis of housing delivery beyond Plan period and that the Vision suggests that it is looking beyond 2038. However, Langtree suggests that the Plan period should fully encompass the proposed delivery of the Garden Suburb and be extended to at least 2052, which is a minimum of 30 years from the earliest the Plan could be adopted in 2022.
- 3.5. Langtree therefore reserve the right to comment further on the Local Plan and policies when this information is updated and provided.

Proposed Change

- 3.6. To overcome the objection and address soundness matters, the Council should:
- Amend the Plan to reflect national policy and guidance.

- Amend Plan period.

4. Vision and Objectives

- 4.1. Langtree **supports** the ambitious Vision for Warrington, but **suggests** the Vision should be extended for clarity to reflect national policy and guidance.

Justification

- 4.2. Langtree supports the ambitious Vision which seeks to “consolidate” Warrington’s “position as one of the most important economic hubs in the UK” and to support Warrington’s “long term growth”. However, the Vision appears to be up to 2038 “and beyond”. This lack of clarity could hinder the economic growth ambitions and is not positive.
- 4.3. However, Langtree suggests that the Vision could be enhanced by looking further ahead and safeguarding land for long term development and meeting the housing needs of all communities and settlements within the Borough, including Appleton Thorn.
- 4.4. Furthermore, the 2021 Framework indicates that where “larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. The Vision suggests it is looking beyond 2038, but provides no impression of timescales. Langtree suggests that the Plan period should fully encompass the proposed delivery of the Garden Suburb and be extended to at least 2052, which is a minimum of 30 years from the earliest the Plan could be adopted in 2022. This would then provide the opportunity, as the Plan suggests, to plan positively for the long term and allocate or safeguard appropriate sites to deliver the aspired growth, particularly for employment land.

Proposed Change

- 4.5. To overcome the objection and address soundness matters, the Council should:
- Extend the Local Plan period to be a minimum of 30 years.
 - Identify safeguarded land.
 - Allocate housing land in Appleton Thorn.

5. Policy DEVI: Housing Delivery

- 5.1. Langtree **suggests** that further housing sites are needed, including their site at Arley Road, Appleton Thorn.

Justification

- 5.2. The Framework describes the purpose of the planning system to contribute to the achievement of sustainable development. There are three overarching objectives which are central to the achievement of sustainable development: economic, social and environmental. The economic objective is to *“help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”* [Paragraph 8, NPPF, Spawforths emphasis].
- 5.3. Plans are required to be prepared positively and in a way that is aspirational but deliverable, and ensure that strategic policies look ahead over a minimum of 15 years from adoption in order to anticipate and respond to long term requirements and opportunities such as those arising from major improvements in infrastructure. Strategic policies include the scale and quantity of development and making sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development alongside infrastructure and community facilities.
- 5.4. Furthermore, paragraph 22 of the Framework states *“Where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account the likely timescale for delivery”*. [Paragraph 22, NPPF, Spawforths emphasis].
- 5.5. The Framework is clear that to be considered positively prepared and therefore ‘sound’ the plan must, as a minimum meet the plans objectively assessed needs [Paragraph 35, NPPF].
- 5.6. The Government is committed to boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed [Paragraph 60, NPPF].

- 5.7. The Plan is also expected to create conditions in which businesses can invest, expand and adapt, which requires a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. There should be significant weight on the need to support economic growth and productivity. Plans are required to be flexible enough to accommodate needs that have not been anticipated within the Plan. Critically in relation to housing, the Framework requires growth and investment in infrastructure to be aligned, and that policies “*address barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*”. Policies are also required to recognise and address the specific locational requirements of different sectors [paragraphs 81, 82 and 83NPPF].

Housing Requirement

- 5.8. As highlighted earlier, Langtree believes that the scale and growth of the aspirations for the Garden Suburb in particular constitutes a ‘*Significant extension*’ for the purposes of Paragraph 22 of the Framework. **As a result Langtree considers there is a need for the Plan to provide a clear longer term vision of at least 30 years.** This supports Langtree’s representations that there is a need to ensure that there is a long term framework to support sustainable housing, employment and infrastructure provision in the Borough to realise the potential of this significant investment.
- 5.9. Within this context Langtree considers it is important that the proposed housing requirement is viewed as a minimum and barriers are not put in place which may hinder greater levels of sustainable growth. It is considered that the Plan could facilitate higher levels of growth by providing greater flexibility. Langtree considers that Warrington is ideally located to achieve high levels of growth, providing it is based upon an appropriate development strategy.

Housing Distribution

- 5.10. Furthermore, it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.
- 5.11. Langtree is concerned that Appleton Thorn as a significant Outlying Settlement, which is in a sustainable location adjacent to employment parks but that it has not been identified to accommodate any new housing. The supporting evidence to the Plan does not indicate the

reasoning or what alternatives have been considered to support the housing need and housing provision in Appleton Thorn up to 2038.

- 5.12. **Langtree suggests that their site at Appleton Thorn should be identified as a housing allocation given its sustainable location and proximity to services and facilities, including significant employment opportunities and jobs.**

Housing Density

- 5.13. This part of the Policy encourages higher density schemes with a minimum of 30dph and densities of less than 30 dph where there is a clear planning objective. Langtree supports efficient use of land, however the consideration of densities needs to be undertaken in the context of feasibility and deliverability of each individual site, particularly with the requirements for M4(2) and M4(3) standards, NDSS and other policy requirements, including POS, Biodiversity Net Gain, design standards and parking standards.

- 5.14. Such policy requirements and standards will have implications for the size, type and tenure of homes and potential achievable densities. Langtree therefore recommends that the Council increases the flexibility of the policy to ensure the densities are realistic and achievable and ensure the delivery of homes that are appropriate to the market. In doing so, Langtree would suggest the potential numbers of homes on each site is also reviewed. This could therefore have implications on the total number of deliverable homes in the Plan and may require further sites being identified, such as Langtree's site at Appleton Thorn.

Stepped Housing Requirement

- 5.15. This part of the policy indicates that the housing requirement will be stepped from 678 dwellings per annum in the period 2021-2025, up to 870 homes per year from 2026 onwards.
- 5.16. Langtree does not consider a stepped requirement is necessary and that the appropriate provision of housing should be provided for the entirety of the Plan period. The Council's justification appears to suggest that the stepped requirement is needed to achieve a five-year housing land supply at the start of the Plan period. Langtree suggests that more sites should be identified that are deliverable at the start of the Plan period, rather than constraining supply. One such site that could address this shortfall is Langtree's site at Appleton Thorn.

Housing Supply

- 5.17. Langtree has some concerns in relation to the approach outlined within the Plan to achieve the housing requirement, including anticipated delivery rates and the windfall allowance.
- 5.18. The housing trajectory tables within the appendix to the Plan contain some ambitious delivery rates on some complex sites, including Fiddlers Ferry. This site is a former power station, which is seriously constrained. The Council's own evidence shows the site constraints, indicating contaminated land, HSE COMAH zones and site clearance works. Site decommissioning works could take seven years from spring 2020, therefore the site is not broadly available until 2027. Nevertheless, the Council's evidence indicates this is ambitious and that the site is not likely to be available until 2030, which is considered more likely. Therefore, it is curious within the housing trajectory tables appended to the Plan that Fiddlers Ferry is shown to be coming forward with 35 dwellings in 2025/26 at the end of the first five years of the Plan period, and is therefore considered to be "deliverable" in accordance with the Framework. Furthermore, the trajectory continues to show the site rising to 70 dwellings per year. The trajectory shows that 305 dwellings are delivered on Fiddlers Ferry when the Council evidence shows the site is more likely to be unavailable. Langtree considers a more reasonable and pragmatic approach is shown in the Plan for the delivery of Fiddlers Ferry and that further sites are identified to accommodate for any potential slippages.
- 5.19. It is also unclear from the range and choice of sites how the Council will achieve the delivery of the range of housing required to address housing needs. Langtree would like to emphasise that the Local Plan's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Borough's housing requirement. This sufficiency of housing supply should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply and achieve Housing Delivery Test performance measurements.
- 5.20. Langtree is aware that the Secretary of Statement in the recent Peel Hall appeal decision (Appeal ref 2016/28492) shows that the Council only have a 3.4 year housing land supply and that the Council has failed all three requirements of the Housing Delivery Test. The Secretary of State gave "very substantial weight" to the delivering of market and affordable housing and significant weight to the economic benefits the housing will bring to the area during construction and thereafter. Langtree suggests that the Council prepare a clear approach to

the delivery of new housing in the Borough to address this identified issues, which should include the identification of further sites.

- 5.21. Furthermore, the evidence in relation to the windfall allowance does not fully reflect national policy and guidance and should show that such a quantum will continue for the lifetime of the Plan. Currently the Plan does not include any evidence for the Small Site Allowance. Langtree accepts that small sites should continue to come forward, however the trajectory in Appendix I suggests that these will occur from Year 1. There could therefore be an element of double counting. Furthermore, the rate appears to be consistent at 81 dwellings per annum and assumes within Year 1 onwards that planning applications for 81 homes will be submitted, approved, commenced and completed each year. This approach does not reflect Best Practice or that windfalls will reduce in the future upon adoption of an up to date Local Plan.
- 5.22. The Council's overall housing land supply should include a mix of short and long-term sites. It is generally recognised that housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings, including affordable housing, to meet their housing needs. Such an approach provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. Therefore, it is important that Langtree' site at Appleton Thorn is considered as a smaller non-strategic site that can importantly deliver affordable housing.
- 5.23. It is critical that an accurate assessment of availability, suitability, achievability and therefore deliverability and viability is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by promoters responsible for the delivery of housing on each individual site. This will allow a clear statement on five year housing land supply at the point of adoption.
- 5.24. Langtree conclude that there is a need for further allocations to support the requirement within Policy DEVI.

Summary

- 5.25. Langtree consider that their site at Appleton Thorn should be allocated for housing. Langtree have put this site forward previously and given the site's relationship with the existing employment sites and proposed employment sites, this is an eminently sustainable opportunity, which is available, suitable and achievable. Further information on this site is shown later on in these representations.
- 5.26. Langtree have highlighted that no evidence is available to explain the reasoning for not allocating this site and for no new housing to be proposed at Appleton Thorn. Given the scale of Appleton Thorn as an Outlying Settlement it would be appropriate for the settlement to accommodate some new housing, especially with adjacent employment opportunities.
- 5.27. The Plan states through Policy DEVI that the proposed number of new homes is a minimum to be achieved. However, there does not appear to be a mechanism identified to achieve a significantly more than this, other than the potential 10% flexibility. However, as highlighted earlier there are some questions on delivery rates and trajectory on some complex sites such as Fiddlers Ferry. Langtree would also like to highlight the recent Secretary of State decision which shows that the Council do not have a five year housing land supply and that very substantial weight was placed on this issue. Furthermore, the additional benefits for housing including construction jobs and additional spend in the area was ascribed significant weight by the Secretary of State.
- 5.28. Langtree would like to highlight that it is important to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. This is recognised within the Framework, paragraph 82. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will increase sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Warrington.
- 5.29. Importantly the HBF released in July 2018 its report on the Economic footprint of house building in England and Wales, which shows that housebuilding in England and Wales was worth £38bn a year, supporting 700,000 jobs. House building activity contributes economically

in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economy in a wider sense through being a driver for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.

- 5.30. An important conclusion of the report and the wider economic benefits is that **a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth.** This relationship is recognised within the regional economic strategies, which notes the importance of attracting and retaining a working age population, and ensuring there is sufficient housing to support the needs of existing residents and new residents.
- 5.31. The Government published the revised standard methodology for assessing local housing need on 16th December 2020. The approach changed partly in response to the Covid-19 pandemic, however the aims of the revisions remain as set out in the ‘changes to the current planning system’. The Government reaffirm their commitment ‘*to the delivery of 300,000 new homes a year, a focus on achieving more appropriate distribution of homes, and targeting more homes in areas where there are affordability challenges*’. The Government has indicated that they are committed to seeing 300,000 homes per year delivered by the mid 2020’s and has reiterated that the local housing need figure **‘does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area’**. Local authorities remain responsible for determining how many homes to plan for, and this should take account of local circumstances.
- 5.32. Langtree therefore considers that further sites should be identified to deliver much needed housing in Warrington and that an appropriate site would be:
- Arley Road, Appleton Thorn
- 5.33. A brief summary is provided for this site later on in these representations, which includes a site plan. The site is supported by significant technical information which demonstrate that the site is available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG.

Proposed Change

5.34. To overcome the objection and address soundness matters, the Council should:

- Extend the Plan period to be at least 30 years from the date of adoption.
- Review and provide evidence for the windfall allowance.
- Review delivery rates and trajectory on allocations.
- Identify further sites to increase flexibility in the Plan.
- Allocate for housing Langtree's site at Appleton Thorn

6. Policy DEV2: Meeting Housing Needs

- 6.1. Langtree **suggests** that Policy DEV2 does not reflect the positive approach of national policy and guidance.

Justification

- 6.2. Langtree supports the provision of affordable housing and is aware that the Council's evidence suggests that there is a significant need for new affordable housing in the Borough. Reflecting the Viability Assessment, the Plan proposes that 30% of new homes on greenfield land is provided as affordable housing and 20% of new homes on previously developed land.
- 6.3. Langtree is concerned that given the need identified in the Local Housing Needs Assessment that insufficient housing land is identified to meet the need and that further sites should be identified that could assist in delivering affordable housing. This is reflected in the supporting justification to Policy DEV2 in paragraph 4.1.38, which states that the Council is not proposing an uplift to the housing requirement to deliver the significant need for affordable housing as this could lead to a level of growth that would raise environmental concern.
- 6.4. However, no assessment has been made of some further provision of housing, such as at Appleton Thorn, which could assist in providing some new housing, including affordable housing. Appleton Thorn is a sustainable settlement adjacent to significant existing employment opportunities and close to new employment proposed in South East Warrington. It would be appropriate to identify a level of new housing in this settlement, which could assist in delivering much needed new affordable and market housing in the area. This would go further towards addressing the significant need for affordable housing in the Borough, without significantly raising environmental concerns.
- 6.5. Further justification and evidence is provided on Langtree's site at Appleton Thorn later on in these representations.

Proposed Change

- 6.6. To overcome the objection and address soundness matters, the Council should:
- Allocate Langtree's site at Appleton Thorn.

7. Policy DEV4: Economic Growth and Development

- 7.1. Langtree **strongly supports** the allocation of the South East Warrington Employment Area, but **suggests** there should also be safeguarded land for employment at Six 56 Phase II.

Justification

- 7.2. Langtree **strongly supports** Policy DEV4 and the approach towards economic growth in the Borough. Langtree in particular **supports** in Part 4 the allocation of the South East Warrington Employment Area.
- 7.3. Langtree controls a significant portion of the proposed South East Warrington Employment Area, known as Six 56. An outline planning application (2019/34799) has been submitted to the Council for:
- The outline application (all matters reserved except for means of access) comprises the construction of up to 287,909m² (3,099,025ft²) (gross internal) of employment floorspace (Use Class B8 and B1(a) offices) including change of use of Bradley Hall Farmhouse to B1 (a) office use (335m² (3,600ft²)), demolition of existing agricultural outbuildings and associated servicing and infrastructure including car parking and vehicle and pedestrian circulation, alteration of existing access road into site including works to the M6 J20 dumbbell roundabouts and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station, and ecological works.*
- 7.4. Parameter plans accompany the planning application, which includes an Environmental Impact Assessment, and which shows development cells, disposition (including uses), green infrastructure, access and circulation, noise, drainage, building heights and finished floor levels and heritage (including buffers to heritage asset). The most recent illustrative masterplan shows how the site could be developed, taking account of the site parameters. The most recent illustrative masterplan and parameter plans are appended to these representations (Appendix I).
- 7.5. The Planning Statement that accompanies the planning application outlines the significant benefits of the proposed scheme including the economic need for the site, socio-economic and environmental benefits.

- 7.6. The site is controlled by Langtree and is therefore **available** for development. The technical information and Environmental Impact Assessment that accompanies the planning application demonstrates that the site is **achievable**.
- 7.7. The **suitability** of the site is supported by the Council's evidence, which identifies the locational needs of the B8 strategic sector as being in South East Warrington. The Council's 2021 Economic Development Needs Assessment grades the site A+ and is the highest ranked employment site within the study.
- 7.8. The EDNA explains that the site's "direct motorway access is a key feature, making it more attractive to the market than more isolated sites. More generally the market for larger B2 and particularly B8 premises remains very strong and has only benefited from the growth of e-commerce in 2020/21. The proposal has already generated some occupier interest and partners see no reason why it cannot be delivered by 2027." This analysis flows through the study highlighting that the site has limited constraints and is available immediately. The site is therefore suggested to be Option One for a new allocation to meet the identified employment need.
- 7.9. Six 56 has all the attributes and fully meets the locational requirements of B8/Logistics operators. It lies within one of the UK's most efficient locations for this sector, in close proximity to the strategic motorway network and the M56/M6 Interchange. It is also midway between Liverpool and Manchester and within 10 miles of Manchester Airport and presents an excellent opportunity to become a major Northwest logistics location.
- 7.10. The EDNA is clear that any new warehouse and distribution sites should be able to accommodate large regional and national production/distribution facilities of 5-10 ha in size and equally be able to accommodate the very largest logistic operators. From the Council's evidence base, it is evident that there are no sites outside of the Green Belt that could meet this requirement.
- 7.11. In comparison to other potential sites, Six 56 scores strongly. It will provide 64.74 ha of employment land and can accommodate a range of distribution facilities. The site has the potential to deliver nearly 3 million sq. ft. of high quality logistics floor space and become a major employment site for the Borough of Warrington, replicating the success of the Omega site to the north of the Borough.

- 7.12. The Six 56 site will have direct and convenient access to the motorway which will be facilitated by the highway works being proposed to Grappenhall Lane (B5356) as well as mitigation works to the A50/Cliff Lane roundabout and Junction 20 of the M6 Motorway. The location of the site also has the benefit of ensuring that freight traffic would be directed away from any sensitive receptors such as residential properties and away from the local highway network.
- 7.13. The proposed site is generally flat and expansive with no topographic constraints and is capable of providing large and level plots suitable for large footprint B8 uses. A detailed constraints and opportunities exercise has been carried out to confirm that the development cells can be delivered. The planning application seeks to establish means of access and is guided by a series of parameters.
- 7.14. The site is accessible to the supporting supply chain and is close to an established employment area and an area of population and is also close to the proposed new South Warrington Urban Extension. The site's proximity to a suitable population centre is critical from a labour force perspective with some of the largest logistics facilities requiring over 3,000 warehouse staff to run efficiently in various shift patterns.
- 7.15. The land is also readily available and is under the control of willing landowners. All these attributes are key drivers for businesses when making decisions on locations for new employment space, in particular logistics operators. **The proposed allocation of the South East Warrington Employment Area is therefore available, suitable and achievable and is therefore deliverable and attractive to the employment market.**

Safeguarded Land for Employment

- 7.16. However, as highlighted earlier Langtree question whether the Local Plan is looking too short term rather than as the Vision states beyond 2038, as the Council is not identifying future locations for growth for long term employment land.
- 7.17. The Council acknowledges within the supporting justification that insufficient employment land is being identified for the Plan period with an 8 hectare shortfall. The Council seek to address this through the Omega Phase 2 scheme, which is located in St Helens and was allowed by the Secretary of State in their Call-In decision on 11th November 2021. The Council indicate that if this were approved they would seek an agreement with St Helens that some of that scheme is meeting the needs of Warrington. Part of the Omega site is the

subject to the Duty to Cooperate Agreement between St Helens and Warrington but part is not. There is no guarantee that this additional land will count towards Warrington's supply (as it is located within St Helens).

- 7.18. Local Plans should be planned positively and should meet identified needs now. The Plan strategy explains that a review of Warrington's employment land will be undertaken before the end of the Plan period to identify future locations of growth. The Plan is therefore not identifying sites to come forward later on in the Plan, or safeguarded sites. However, there is no explanation or justification for this approach, especially as there is a perfectly reasonable site at Six 56 Phase II which could be safeguarded for long term employment land.
- 7.19. The Framework states that safeguarded land should be identified to meet longer term development needs well beyond the Plan period. The Council states within the Local Plan that other areas for employment land within the Borough have been considered but will not be allocated or safeguarded at this stage, but will be considered through an early review of the Plan. Langtree does not consider this addresses the Framework in relation to long term permanent Green Belt boundaries and demonstrating that Green Belt boundaries will not need to be altered at the end of the Plan period.
- 7.20. Langtree is concerned that some identified areas of employment land such as Fiddlers Ferry are constrained and may not come forward as expected. The EDNA highlights these concerns scoring the site as only B- and as the fourth option, below Six 56 Phase II, to accommodate the future employment growth of the Borough. The Council's evidence notes this site is a former power station, which is seriously constrained. The Council's own evidence shows the site constraints, indicating contaminated land, HSE COMAH zones and site clearance works. Site decommissioning works could take seven years from spring 2020, therefore the site is not broadly available until 2027. Nevertheless, the Council's evidence indicates this is ambitious and that the site is not likely to be available until 2030, which is considered more likely. Langtree understands that this site is a regeneration opportunity, however there should be fall back alternative position (Six56 safeguarded land site) if this site does not come forward as expected.
- 7.21. It is Best Practice therefore to have sites in reserve, such as safeguarded land, which can be brought forward to address any shortfalls in provision. It would seem a logical starting point in the absence of clear guidance to ensure that the level of safeguarded land is sufficient to ensure that development needs can be met for a period of at least 15 years post adoption,

this necessitates the need for safeguarded land to provide for an appropriate buffer. The PAS ‘good plan making guide - question and answers’ section¹ states that safeguarded land should be ‘considered beyond the 15 years of the plan... the notion is to make any changes to the Green Belt more permanent, i.e. probably two plan lifespans’. This approach aligns with the current Framework which recognises the need for longer term visions. It would appear sensible given the Framework’s requirements for permanence well beyond the Plan period to consider the merits of safeguarding sufficient land for two Plan periods (30 years).

7.22. The Cheshire East Local Plan Strategy identifies circa 200 hectares of safeguarded land across a range of towns. The Inspector’s report concluded:

“Policy PG4 sets out the CEC’s approach to identifying Safeguarded Land, confirming that development will not be permitted in such areas unless it is justified through a review of the CELPS, and designated the sites identified as Safeguarded Land...The CELPS-PC proposed to release some 200 ha of land from the Green Belt for Safeguarded Land in the north of the Borough, which is justified in the supporting evidence (STA) [PS/E03/a5]; various options for the distribution of Safeguarded Land were also considered by CEC. The overall amount of proposed Safeguarded Land is intended to meet longer-term development needs stretching well beyond the end of the current plan period; in fact, taking account of other sources of land, it should be sufficient for another full 15-year period beyond 2030, so that the Green Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045.

Some participants are concerned that the overall amount of proposed safeguarded Land is inadequate to meet future development needs, but as confirmed in my Further Interim Views (appendix 2), I consider CEC has taken a balanced and cautious approach to the amount of Safeguarded Land to be identified which seems to be logical, rational, effective and justified by the supporting evidence; CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land. Since then, no new evidence has been presented to alter this conclusion”

7.23. Langtree considers that sufficient safeguarded land should be identified in the Local Plan to ensure that Green Belt boundaries will endure and provide permanence in the long term. In line with the PAS guidance this should constitute at least 15 years’ worth of employment and housing provision. Although safeguarded from development, safeguarded sites are generally

¹ Good Plan Making Guide - PAS<https://www.local.gov.uk/sites/default/files/documents/principle-2-95a.pdf>

considered to be the next pool of sites for consideration as they are excluded from the Green Belt. As such they can also be considered reserve sites, if allocations do not proceed as expected, as they have already been considered through a Green Belt Review and site assessment.

7.24. Langtree is therefore concerned that there is no safeguarded land for employment within the emerging Local Plan. Furthermore, there is no trigger mechanism through Policy M1 to undertake an early review of employment land, if necessary. This will be explored further in response to Policy M1.

7.25. Langtree therefore suggest the Six 56 Phase II, as shown on the attached plan and below, should be safeguarded for long term development. The site is available, suitable and achievable and is therefore deliverable. A slightly larger site was reviewed through the EDNA and was the second most suitable site for employment, scoring A-. The only reason for rejection was that the site was in multiple landownerships. This slightly smaller site is controlled by Langtree and should be identified for the second phase of Six 56.

7.26. Further information on Six 56 Phase II is provided at the end of these representations.

Proposed Change

7.27. To overcome the objection and address soundness matters, the Council should:

- Allocate Six 56 Phase II at Grapenhall Lane as safeguarded land for long term development for employment.

8. Policy GB I: Green Belt

- 8.1. Langtree **supports** Policy GB I in principle, but there are aspects that should be reviewed as its operation lacks clarity and creates uncertainty.

Justification

- 8.2. Langtree **supports** the identification and release of South East Warrington Employment Area from the Green Belt within Part 3 of Policy GB I. However, as highlighted earlier Langtree suggests there is a need for housing land to be released at Appleton Thorn and safeguarded land for long term employment development at Six 56 Phase II.
- 8.3. Part I of Policy GB I states that the general extent of the Green Belt is set through the Plan to at least 2050. However, as highlighted earlier the Plan states that the employment land will be reviewed before the end of the Plan period, which is currently 2038. This statement is inconsistent and does not reflect the strategy or evidence of the Plan.
- 8.4. This is reflected in the reasoned justification paragraph 5.1.19 which recognises the uncertainties over the longer term employment land supply and that an early review of the Plan is likely to be required.
- 8.5. Langtree therefore considers that Six 56 Phase II should be safeguarded for long term employment development within this Local Plan Review.
- 8.6. Furthermore, in response to Policy DEV I Langtree have highlighted issues with housing land supply and spatial distribution of housing and that Appleton Thorn as an appropriate sustainable settlement adjacent to significant employment provision which should accommodate some new housing. Langtree's site at Appleton Thorn should therefore be identified and released from the Green Belt.

Proposed Change

- 8.7. To overcome the objection and address soundness matters, the Council should:
- Safeguard land at Six 56 Phase II at Knutsford Road for long term employment development.

- Allocate Arley Road, Appleton Thorn for housing.

9. Policy INF5: Delivering Infrastructure

9.1. Langtree **suggests** Policy INF5 is amended so that it is clear and creates certainty.

Justification

9.2. Langtree query some aspects of Policy INF5, in particular Points 5 and 6 which do not reflect national policy and guidance.

9.3. Point 5 explains the areas to be included in planning contributions, but then states that these areas are not limited. Langtree would like to highlight that national guidance states that policies on planning obligations should be clear so that they can be accurately accounted for in the price paid for land. Guidance continues stating that such policies should be informed by evidence of infrastructure needed and the level of contributions should be assessed through the Viability Appraisal for the Plan.

9.4. Langtree consider that the areas and types of contributions should be clear established in policy. The current terminology in Point 5 is vague and lacks clarity and certainty for delivery.

9.5. Furthermore, Point 6 suggests that the only areas that can be discussed on viability are new areas that have arisen post preparation of the Plan. However, Langtree query the Viability Appraisal in relation to the South East Warrington Employment Area, which does not reflect accurately the proposal. Langtree support the overall conclusion on the viability of the site, however Langtree suggest there is an over emphasis on additional utilities and strategic infrastructure costs and that further evidence and reasoned justification should be provided or the Viability Appraisal be updated to reflect the proposed employment allocation.

Proposed Change

9.6. To overcome the objection and address soundness matters, the Council should:

- Update policy to reflect national policy and guidance.
- Update Viability Appraisal.

10. Policy ENV7: Renewable and Low Carbon Energy Development

- 10.1. Langtree **suggests** that Policy ENV7 is amended so that it is clear and creates certainty.

Justification

- 10.2. Langtree supports tackling climate change and reducing carbon emissions. However this should be undertaken in an efficient and comparable manner between authorities and areas. Langtree considers that Councils should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards the Government are bringing in.
- 10.3. Langtree is also concerned with Point 5 which states that within the major allocations should reduce carbon emissions and maximise opportunities for decentralised energy systems. This is then reinforced as a "requirement" which states that "in these locations all development will be required to establish, or connect to an existing, decentralised energy network unless this is shown not to be feasible or viable".
- 10.4. Decentralised energy networks are generally unviable for many schemes and uncompetitive. Langtree would like to emphasise that decentralised energy networks are only one aspect of the path towards decarbonisation and currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why decentralised energy networks are not installed is the substantial up-front capital cost. Therefore, energy networks are currently largely uneconomic. The focus should therefore be on alternative approaches to decarbonisation and the terminology within Points 5 and 6 should be reviewed.

Proposed Change

10.5. To overcome the objection and address soundness matters, the Council should:

- Amend to reflect national policy and guidance.
- Review Points 5 and 6.

11. Policy ENV8: Environmental and Amenity Protection

11.1. Langtree **suggests** that Policy ENV8 is amended so that it is clear and creates certainty.

Justification

11.2. Langtree is concerned that Policy ENV8 is tied into Policy MD6 and the allocation of the South East Warrington Employment Area. Point 20 of Policy MD6 states that development within the allocation will be required to mitigate air quality impacts on the Manchester Mosses SAC in accordance with Policy ENV8 (Part 4).

11.3. However, it is unclear from the evidence how Policy ENV8 has been informed and derived. Furthermore, Part 4 clearly states that the main allocations and the smaller settlement allocations, which line the M62 corridor that would result in increased traffic flows past the Manchester Mosses SAC of more than 100 vehicles per day or 20 Heavy Goods Vehicles per day must devise a scheme to reduce reliance on cars and reduce trip generation.

11.4. Langtree would therefore suggest that given the South East Warrington Employment Area is not specifically on the M62 Motorway the references to specific allocations should be removed from the policy. Furthermore, the policy does not recognise site locations and distances to Manchester Mosses SAC. The South East Warrington Employment Area is some distance from Risley Moss, Holcroft Moss and Astley & Bedford Mosses.

11.5. Therefore, Langtree suggest that the term “must devise a scheme-specific range of measures” creates inflexibility within the policy and is too onerous. This should be amended to a term that reflects the evidence on a site by site basis. This should be amended to “should devise a scheme-specific range of measures”.

Proposed Change

11.6. To overcome the objection and address soundness matters, the Council should:

- Amend list of allocations that reflects the evidence base and location.
- Remove MD6 from the list of allocations in the policy.

- Amend the term “must” with “should”.

12. Policy MD6: The South East Warrington Employment Area

- 12.1. Langtree **strongly supports** Policy MD6, however aspects of the policy should be amended to reflect the approach and delivery of the site for clarity and certainty.

Justification

- 12.2. Langtree **strongly supports** Policy MD6 which allows for the development and delivery of the South East Warrington Employment Area. The site is currently the subject of a planning application and the illustrative masterplan and parameters plan is attached at Appendix 2. The policy is criteria based and supports the delivery of the site for distribution and industrial uses.
- 12.3. However, the site is controlled and will be delivered by two parties. Although the site is a single allocation the policy needs to recognise that the two parcels are able to be delivered independently of each other. The evidence prepared by Langtree and incorporated within the planning application shows that Six 56 is able to be delivered without the need for third party land. It is understood that the adjacent landowner/developer is also able to bring forward their portion of the site without the need for other land. Therefore, Langtree supports the need for a comprehensive masterplan, however this should be prepared within the context that each individual parcel is able to come forward on its own and accommodate its own green infrastructure, utilities, and drainage and transport requirements. Such an approach is common practice on large schemes.
- 12.4. Paragraph 10.6.5 does not reflect this situation and stipulates the scale of the Development Framework and what it needs to include and that the site cannot come forward until it is agreed by all parties. This is carried forward into Point 3 of Policy MD6, which could therefore constrain and hinder the timely delivery of the development unnecessarily. Langtree considers this can be addressed through an agreed comprehensive masterplan and individual planning applications, which can be directed by a clear and concise Local Plan policy.
- 12.5. This strategic approach should be reflected and continued throughout the policy and descend into each criteria. Currently, the site specific requirements from Point 5 onwards are do not reflect this approach, lack clarity and are onerous. Langtree is concerned that the restrictive terminology and these requirements could affect the timely delivery of the scheme.

Furthermore, some of the “requirements” also refer to site wide requirements, whereas as stated earlier each parcel is able to come forward independently, such “requirements” should therefore only relate to each individual parcel. This lack of clarity does not reflect national policy and guidance on clear and precise policies.

- 12.6. Langtree would also like to highlight that Point 21 does not reflect national policy and guidance to state “development will be required to preserve and enhance the historic environment, heritage assets and their setting”. Langtree suggests that this aspect of the policy is updated to reflect the Framework Chapter 16 Conserving and Enhancing the Historic Environment.
- 12.7. Langtree would like to reiterate, as stated earlier, that the site is available, suitable, achievable and therefore deliverable in accordance with national policy and guidance. A planning application to bring the site forward in the short term has been submitted to the Council and is currently being determined.
- 12.8. However, the policy could be clearer and should reflect the proposed delivery of the site. To assist Langtree have proposed some policy changes below.

Proposed Change

- 12.9. To overcome the objection and address soundness matters, the Council should:
- Delete Para 10.6.5 and replace with:
 - It is recognised that although the site is a single allocation, it will be brought forward in two distinct areas. To assist with the coordinated approach to the site the principal landowners and developers will prepare a comprehensive masterplan for the site.
 - Point 5 amend as follows:
 - Each individual development scheme should demonstrate how it can provide an accessible and appropriate level of green space to support the employment area.
 - Amend throughout the policy where it currently states “required” replace with “should”, including points 7, 17 and 22.
 - Delete Point 14 and replace with:
 - A Framework Travel Plan should be provided for each individual development scheme.

- Amend first sentence of Point 15 to state:
 - Each individual development scheme will provide a foul and surface water strategy.
- Amend Point 20 as follows:
 - Development within the allocation site should consider and may need to mitigate air quality impacts on the Manchester Mosses SAC in accordance with Policy ENV8.
- Amend Point 21 as follows:
 - Development should consider the historic environment, heritage assets and their setting.

13. Policy M1: Local Plan Monitoring and Review

- 13.1. Langtree **suggests** that Policy M1 is updated to incorporate a review mechanism for employment land to create clarity and certainty.

Justification

- 13.2. Langtree supports the principle of Policy M1 and its mechanisms for monitoring and review of the Local Plan. However, this policy only relates to housing and the delivery of housing. Given the need and strategy for employment and economic growth in the Borough the Monitoring Framework should encompass all policies, including employment land delivery.
- 13.3. This approach is reinforced through the Council having an identified shortfall against employment need; there are concerns with the delivery of Fiddlers Ferry, and the Council has highlighted already the need for an early review of the Plan for employment growth.
- 13.4. Langtree would suggest that employment delivery should also be contained within the Monitoring Framework. Such an approach is supported by cross references within the Policy to Appendix 2, which includes Policy DEV4 and the MD policies. However, there needs to be a trigger mechanism to measure performance, which Langtree is happy to work with the Council on.

Proposed Change

- 13.5. To overcome the objection and address soundness matters, the Council should:
- Include employment land delivery in Policy M1.

14. Omission Site: Knutsford Road, Six 56 Phase II

- 14.1. Langtree **suggests** that their site at Knutsford Road, Six 56 Phase II is included in the Plan as safeguarded land for long term development.

Test of Soundness

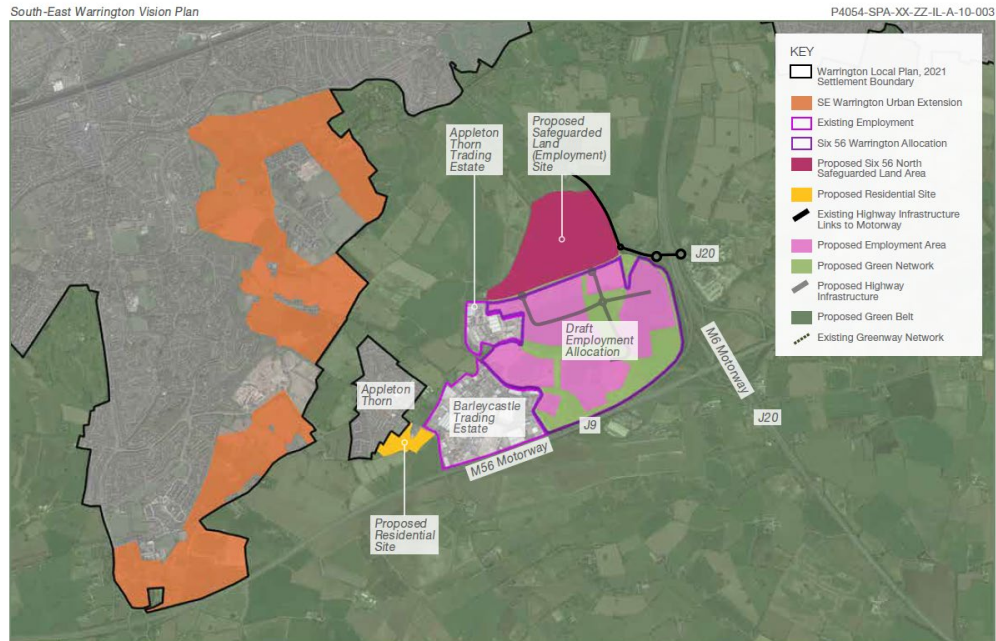
- 14.2. Langtree considers that the Local Plan is unsound, however it can be made sound through the allocation of Langtree’s site at Six 56 Phase II as safeguarded land for long term development.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 14.3. Langtree has explained that there are some issues with the employment strategy and non-identification of safeguarded land for long term development. Langtree has also highlighted that there are some delivery issues with Fiddlers Ferry. Langtree appreciates that Fiddlers Ferry is a regeneration opportunity. Nevertheless, Langtree considers for a robust Plan it would be prudent to accommodate within the Local Plan a reserve site or safeguarded land that can be brought forward if there are issues with the employment land supply.
- 14.4. Six 56 Phase II is an extension to the first phase of Six 56, which forms part of the South East Warrington Employment Land allocation and is currently the subject of a planning application. Six 56 Phase II would be accessed from Knutsford Road and is within the control of Langtree.
- 14.5. This site was assessed by the Council and was graded through the EDNA as A- and therefore is one of the most appropriate employment opportunities considered by the Council. Indeed it performs better than the proposed Fiddlers Ferry allocation. The only concern highlighted

is the multiple land ownerships. This proposal put forward by Langtree is smaller than that considered through the EDNA and by the Council and is within Langtree's control.



14.6. The strategic approach below, shows the robust boundaries and strategy towards the site and area around South East Warrington. The site would be bound by Grappenhall Lane, Knutsford Road and strong tree belts, which will provide a long and lasting defensible Green Belt boundaries.

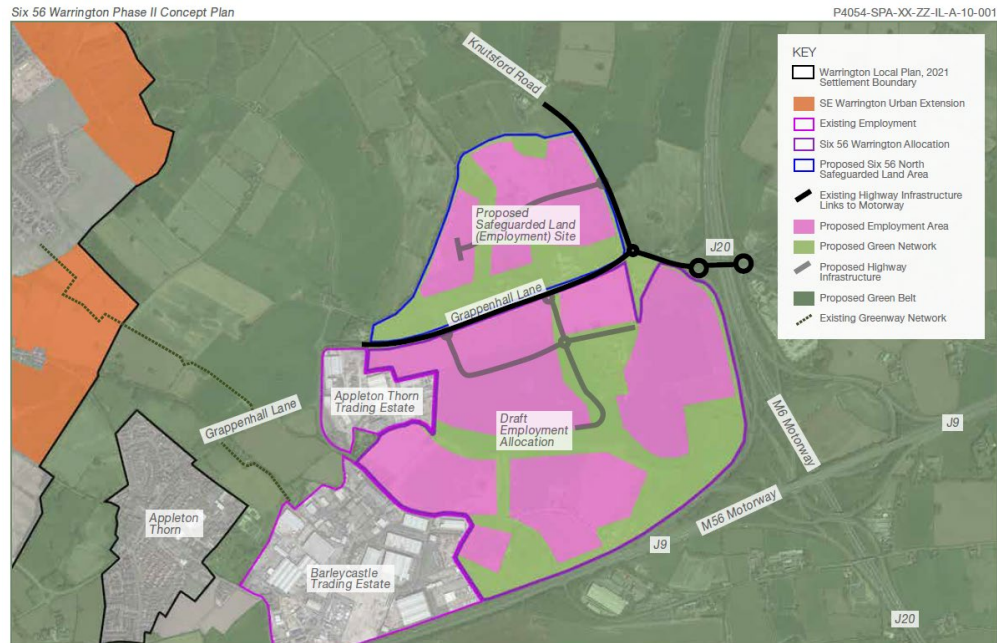


14.7. Langtree considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. **Langtree has prepared an indicative concept plan which is shown below and attached to these representations (Appendix 2).**

14.8. The deliverability and benefits of the Six 56 Phase II, Knutsford Road site are as follows:

Overview of Proposals

14.9. The site is located on Knutsford Road (A50). To the south lies Grappenhall Lane (B5356), beyond which is Six 56 Phase I. To the east are fields beyond which lies the M6 motorway, to the north lies fields an old employment unit and dogs home, to the west beyond the tree belt are fields. The site is circa 50ha and could accommodate further strategic employment adjacent to Junction 20 of the M6 Motorway.



Deliverability

- 14.10. The site at Six 56 Phase II provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Langtree which further demonstrates the site’s deliverability within the plan period.

Availability

- 14.11. Langtree controls the land at Six 56 Phase II. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

Suitability

- 14.12. The site is located in a highly suitable location for further strategic employment in a prime location for logistics and would build upon the success of other employment sites in the area both locally and regionally.
- 14.13. The site is close to existing employment sites at Appleton Thorn and adjacent to the proposed Six 56 Phase I, which is the subject of a current planning application. Six 56 Phase II is an important opportunity that can benefit the area.

- 14.14. Although the land is in Green Belt it provides a unique development opportunity immediately adjacent to the M6 Motorway that can make an efficient and effective use of the land. The development will benefit Warrington with economic, environmental and social benefits. It is therefore considered that the development is suitable. This is reinforced by the Council's own EDNA assessment of the site.

Achievable

- 14.15. A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request.

Effective Use of Land

- 14.16. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the site can be accessed from Knutsford Road. The scheme is therefore making an efficient and effective use of land and infrastructure.

A Positive Response to the Key Objectives of the Framework

- 14.17. The Framework sets out that the Governments key policy goals include boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. It also sets out that planning policies should help to create the conditions in which businesses can invest, expand and adapt to support economic growth and productivity.
- 14.18. The Framework explains that in respect of employment uses, it confirms that the specific locational requirements of different sectors should be recognised and addressed and that this should include development to serve the logistics and manufacturing markets.
- 14.19. In relation to the Framework:
- The proposal responds positively towards national guidance.

- The site is appropriate for accommodating economic growth, being on a key motorway junction: Junction 20 of the M6 Motorway.
- The proposed site is sustainable and accessible.
- The site has been assessed and is available, suitable and achievable for development.

Benefits of Knutsford Road, Six 56 Phase II

14.20. The development of the site would provide significant benefits. The proposal would provide employment uses that would meet the needs of Warrington and the wider region. It is in a functional economic area in a sustainable location.

14.21. In accordance with the Framework this representation has shown that:

- The site is an economic development opportunity to meet the needs of Warrington and the wider region on a key motorway junction.
- The scheme uses land efficiently and effectively.
- The site is within a sustainable location.
- The scheme will create significant direct and indirect job opportunities both during and after construction.

14.22. The proposal is an appropriate opportunity to provide for the employment needs of Warrington in the short and longer term. The safeguarding of the site for employment purposes would confirm its potential to help continue the provision of a balanced employment supply in the Borough in sustainable locations.

Proposed Change

14.23. To overcome the objection and address soundness matters, the Council should:

- Safeguard the land at Knutsford Road, Six 56 Phase II for long term employment development.

15. Omission Site: Arley Road, Appleton Thorn

- 15.1. Langtree **suggests** that their site at Arley Road, Appleton Thorn should be identified for housing.

Test of Soundness

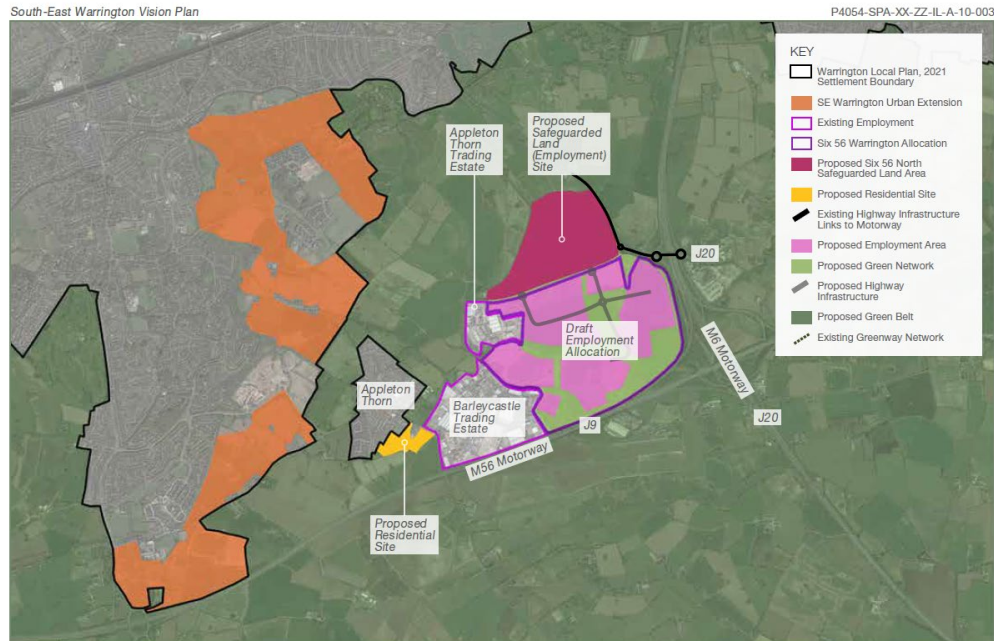
- 15.2. Langtree considers that the Local Plan is unsound, however it can be made sound through the allocation of Langtree’s site at Arley Road, Appleton Thorn.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 15.3. Langtree has highlighted **some concerns** with the housing land supply and spatial distribution of new housing. Langtree also believes that some new housing should be directed towards Appleton Thorn as a larger sustainable Outlying Settlement.
- 15.4. Appleton Thorn is one of the larger settlements in Warrington. However there is no proposed new housing within it in the emerging Local Plan. Furthermore, Langtree’s site at Appleton Thorn does not appear to have been considered within the evidence base as a reasonable alternative for accommodating some new housing within the settlement.
- 15.5. Appleton Thorn is an eminently sustainable Outlying Settlement. The settlement has significant employment opportunities with Appleton Thorn Trading Estate, Barley Castle Trading Estate and HM Prison Thorn Cross all within or immediately adjacent to the settlement. Appleton Thorn has schools and some services and facilities, including public transport routes.
- 15.6. The site is effectively an expansion of Appleton Thorn, which is a large Outlying Settlement. Langtree considers the site should be assessed to reflect its potential and the aims of the

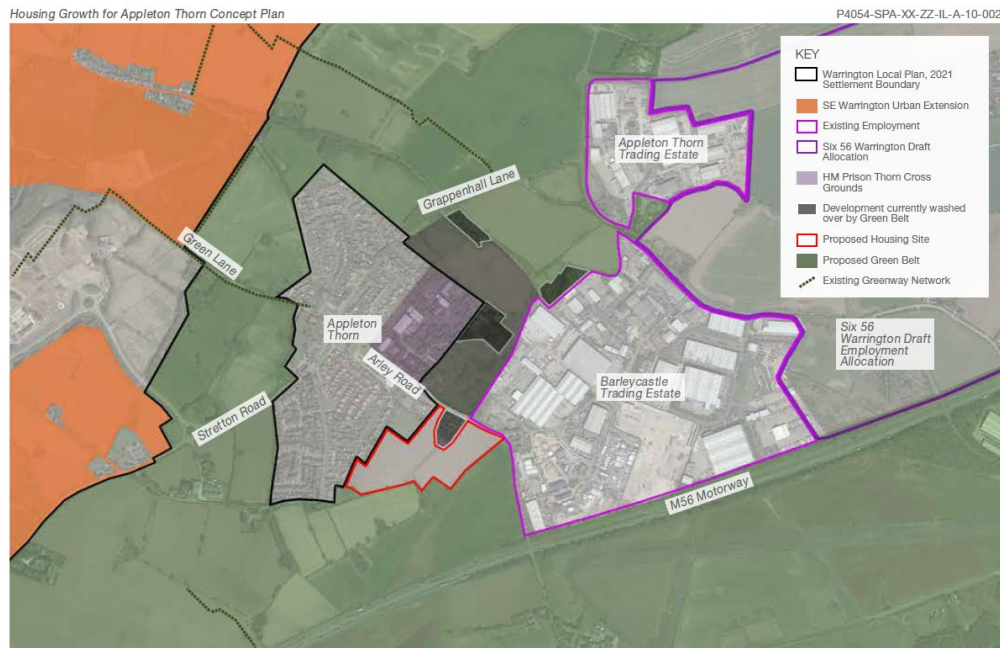
spatial strategy, particularly as Appleton Thorn is adjacent to existing and proposed new employment with the South East Employment Area and Six 56.



- 15.7. Furthermore, the proposed allocations for settlements should consider the functional role of settlements and the location of the site. The Arley Road site is within an area close to employment opportunities, services and facilities. It is a very sustainable location for new housing being adjacent to new employment opportunities and being able to co-locate jobs and homes.
- 15.8. The range and choice of new housing within Appleton Thorn should be addressed given the significant employment opportunities nearby. To not identify any new housing within Appleton Thorn could be detrimental to the area, particularly with the ability to bring forward a proportion of new affordable housing within the settlement.
- 15.9. Langtree considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. **Langtree has prepared an indicative concept plan which is attached to these representations (Appendix 2).**
- 15.10. The deliverability and benefits of the Arley Road, Appleton Thorn site is as follows:

Overview of Proposals

- 15.11. The site is located on Arley Road opposite Appleton Thorn Trading Estate and HM Prison Thorn Cross. To the north lies Appleton Thorn Primary School and to the south lies fields beyond which is the M56 Motorway. The site is circa 5ha and could accommodate in the region of 100 new homes, which will be a range and mix of housing, including affordable housing.



Deliverability

- 15.12. The site at Arley Road, Appleton Thorn provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Langtree which further demonstrates the site's deliverability within the plan period.

Availability

- 15.13. Langtree controls the land at Arley Road. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

Suitability

- 15.14. The site is located in a highly sustainable location and has a mixture of employment and residential development to the north and east. The site is within easy walking distance to a range of services and facilities and is adjacent to Appleton Thorn Primary School.
- 15.15. The site is adjacent to existing employment and is close to the proposed new South East Warrington Employment Area.
- 15.16. The proposed new Green Belt boundary would utilise existing strong features along Arley Road and field boundaries and tree belts, which would effectively round off this part of Appleton Thorn to create a robust long term boundary.



- 15.17. The development will provide additional quality development that will benefit Appleton Thorn and the wider Borough with economic, environmental and social benefits. It is therefore considered that the development is suitable.

Achievable

- 15.18. A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are

insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request.

Effective Use of Land

- 15.19. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the site can be accessed from Arley Road. The scheme is therefore making an efficient and effective use of land and infrastructure.

Delivering a Flexible Supply of Housing

- 15.20. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Langtree considers that the site at Arley Road is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years.

A Positive Response to the Key Objectives of the Framework

- 15.21. The Framework sets out that the Government's key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure but that small sites also have a significant role to play in meeting housing needs. Sites should also make effective use of land and existing infrastructure.

- 15.22. In relation to the Framework:

- The proposal responds positively towards national guidance.
- The site is appropriate for accommodating housing growth, being effectively an expansion of an existing settlement.
- The site is adjacent and accessible to existing and proposed employment uses.
- The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport.

- The site has been assessed and is available, suitable and achievable for development

Benefits of Arley Road, Appleton Thorn

15.23. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of Appleton Thorn and wider Warrington housing market. Therefore this site provides a unique opportunity in a sustainable location.

15.24. In accordance with the Framework this representation has shown that:

- The site is suitable for housing and can deliver circa 100 new homes.
- The proposal will deliver high quality housing.
- The proposal will deliver affordable housing.
- The proposal can provide a good mix of housing commensurate to the demand and need in the area.
- The scheme uses land efficiently and effectively.
- The proposal is in line with planning for housing objectives.
- The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes.
- The scheme will create direct and indirect job opportunities both during and after construction.

15.25. The proposal is an appropriate site to provide for the housing needs of Warrington in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Warrington needs to have a robust housing trajectory and the Arley Road site would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development, adjacent to existing and proposed employment, and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority.

15.26. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

Proposed Change

15.27. To overcome the objection and address soundness matters, the Council should:

- Allocate the site at Arley Road, Appleton Thorn for housing.

Appendix I: Six 56 Plans



Rev. Date By Description

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Six 56 Warrington
Illustrative Masterplan
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SGP

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Six 56 Warrington Parameters Plans

Prepared for

Langtree PP and Panattoni

October 2020

Revision H



Document Heading

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Parameters Plans

1. Development Proposals

1.1 Development Description

The application will be an outline planning application as described below:

The outline application (all matters reserved except for means of access) comprises the construction of up to 287,909m² (3,099,025ft²) (gross internal) of employment floorspace (Use Class B8 and B1(a) offices) demolition of existing agricultural buildings and associated servicing and infrastructure including car parking and vehicle and pedestrian circulation, alteration of existing access road into site including works to the M6 J20 dumbbell roundabouts and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station, and ecological works.

All matters, except for the Means of Access are reserved for consideration at a later date.

Parameters Plans

1.2 Suite of Parameters Plans

During the evolution of the proposals, a number of parameters have been fixed, and form the basis of the Design & Access Statement and environmental assessment supporting this outline planning application. These parameters Plans respond to specific, key elements of the schemes proposals. Many of the parameters Plans have evolved through iterative development which is described in more detail alongside each Parameter Plan presented.

The parameters that inform the proposals for the Site have been generated from the key drivers identified within the South Warrington Urban Extension Framework Plan (SWUEFP) and Warrington Garden Suburb Development Framework Document (March 2019). From this starting point, the arrangement of the Site has been heavily influenced by the presence of the Scheduled Ancient Monument on Site, the neighbouring land uses, including the sensitive residential receptors, the strong transport links and facilities that establish a series of hard boundary conditions, site topography and geological features, and substantial landscape features including Bradley Gorse and Bradley Brook to the immediate South East of the Development Site.

The scheme's evolution will be influenced by a sequence of development plateaus relating to their immediate and wider context arranged around access routes through the Site. The scope of development of each of the plateaus is directly related to that of its immediate neighbours and the associated boundaries of that plateau. Environmental testing has also influenced the scheme evolution.

The proposed parameters are grouped into a series of key themes and are identified across the suite of Parameter Plans, These themes are as follows:

- Development Cells – Developable areas across the site and associated site areas. The developable areas exclude constraints and safeguarded areas.
- Disposition – Land use and disposition of uses across the site, number of units, building heights, finished floor levels, floor space and car parking provision.
- Green Infrastructure – strategic landscaping, open green corridor, ecological mitigation, buffers and bunds, retained vegetation.
- Access and Circulation – points of access into the Site, improvements to A50 junction and M6 J20 dumbbell roundabouts including existing, proposed and diverted footpaths and cycleways and areas safeguarded for potential highway improvements.
- Drainage – including details proposed drainage strategy
- Noise – including areas identified for noise mitigation
- Building Heights – zonal areas identifying maximum building heights across the site
- Heritage – buffers to Heritage Asset
- Demolition – buildings proposed for demolition

Each of these are discussed in more detail in the following pages:

Parameters Plans

1.3 Development Cells Parameters

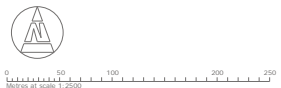
The Proposed Development is to provide a maximum developable area of 62.9 hectares (155.43 acres) This will be provided across 4 development cells, located west to east across the site, as follows:

- Zone A – 2.33 hectares (5.76 acres)
- Zone B – 32.84 hectares (81.14 acres)
- Zone C – 5.06 hectares (12.51 acres)
- Zone D – 22.67 hectares (56.02 acres)

The development plots respond to existing topography and exclude a number of safeguarded areas including the SAM and watercourse stand off zones. The opportunity to provide a green infrastructure link running north to south along the existing PROW is reflected in the space between Development Zones B & D. Buffer zones are incorporated around the existing properties that are outside the scope of this outline application and thus provides opportunity for appropriate mitigation measures.

The development of proposed buildings will be limited to these development zones and the space outside of the development zones will be provided as site wide infrastructure.

The formation of the development zones has evolved to respond to existing topography as well as form the opportunity for green infrastructure connectivity through the site.



OVERALL SUMMARY:

Redline Area: 48.09 Ha / 119.37 Ac
 Proposed Use: B8 with ancillary B1 (A)
 Total Developable Area: 62.9 Ha / 155.43 Ac
 Total Floorspace: 287,909m² (3,099,025 ft²) GIA

Planning Boundary
 Development Zone Boundary. Only new buildings will be located within the development zones.

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Six 56, Warrington
 Development Cells Parameters Plan
 CDE Reference
 Drawing No: 16-184
 Drawing Date: 17/03/20
 Drawing Scale: 1:2500 @ A1
 Project No: 16-184
 Dwg No: P110
 Rev: G

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Parameters Plans

1.4 Disposition Parameters

The Proposed Development is to provide a maximum developable area of 62.9 hectares (155.43 acres) This will be provided across 4 development cells, zones A to D inclusive. The disposition of proposed floorspace across the four zones are as follows:

- Zone A – 8,919m²/96,000ft²
- Zone B – 146,417m²/1,576,025ft²
- Zone C – 24,155m²/260,000ft²
- Zone D – 108,418m²/1,167,000ft²
- Total - 287,909m²/3,099,025ft²
- Existing Bradley Hall Farmhouse buildings within SAM: 352m²/3,783ft²

The proposed Planning Use for Zones A to D inclusive is B8 with ancillary B1(a). With Bradley Hall Farmhouse existing buildings within the SAM will be retained and subject of a separate change of use application.

The disposition of B1(a) is ancillary to the main use of B8. Typically, the proportion of ancillary offices associated to B8 use is approximately 5% of the total floorspace. However, this does vary and depends greatly on the specific occupier requirements.

Zone C:
5.06Ha / 12.51Ac

Proposed Use:
B8 with ancillary B1(a)
Number of Units: 1 Unit

Proposed Floorspace:
Max: 260,000ft² / 24,155m²

Zone B:
32.84Ha / 81.14Ac

Proposed Use:
B8 with ancillary B1(a)
Number of Units:
Ranging from 1 to 6 Units

Proposed Floorspace:
Max: 1,576,025ft² / 146,417m²

Zone D:
22.67Ha / 56.02Ac

Proposed Use:
B8 with ancillary B1(a)
Number of Units:
Ranging from 1 to 3 Units

Proposed Floorspace:
Max: 1,167,000ft² / 108,418m²



Zone A:
2.33Ha / 5.76Ac


Proposed Use:
B8 with ancillary B1(a)
Number of Units:
Ranging from 1 to 3 Units

Proposed Floorspace:
Max: 96,000ft² / 8,919m²

OVERALL SUMMARY:

Redline Area: 99.09 Ha / 242.39 Ac
Proposed Use: B8 with ancillary B1(a)
Total Developable Area: 62.9 Ha / 155.43 Ac
Total Floorspace: 287,909m² (3,295,625 ft²) GFA
Car Parking Provision: Compliant with Council's parking standards for B8 uses - 17,130m²
Existing Buildings within SAM: 382m² (3,783ft²) GFA

-  Planning Boundary
-  Development Zone Boundary. Only new buildings will be located within the development zones.

 Existing building to be retained. Residential Use will cease prior to occupation of proposed industrial uses on the site. Conversion of these buildings to be subject of separate change of use application



Six 56, Warrington
Disposition Parameters Plan

Drawn: HR
Team: HR&E
Date: 12/10/2019

Check Reference: 20-184-P116
Date: 02/03

Project No: 16-184
Dwg No: P116
Rev: I



Parameters Plans

1.5 Green Infrastructure Parameters

Strategic landscaping will be provided around the boundary of the Site. This will also enable the retention of existing trees and vegetation to the outer Site boundaries. Bradley Gorse and Wrights Covert to the southeastern extent of the Site are to be retained, as are the trees within and around the Bradley Hall moated site to the centre of the Application Site.

The two access corridors into the Site from the B5356 Grappenhall Lane will sit within the proposed strategic landscaping areas.

A Green Corridor will be provided from north to south within the Site to retain an open corridor around the Bradley Hall moated site and through the Site. A 15m standoff from built development will be retained to Bradley Brook, which runs east to west along the southern boundary of the Site. An area of ecological mitigation is to be provided to the south of Bradley Brook, around Wrights Covert.

The Site is predominantly a rural, pastoral landscape of small to medium scale fields bounded by mature hedgerows with occasional hedgerow trees. Tree cover includes small woodland blocks and copses, including Wrights Covert and Bradley Gorse. The well-vegetated Bradley Brook runs along the southern boundary of the Site. There are several field ponds within the northern part of the Site with mature trees and scrub.

The baseline Arboricultural Survey and Assessment carried out in September 2017 (which is appended to the ES) has established that the tree stock across the Site is broadly made up of either moderate (Category B) or high landscape value (Category A) trees, which are generally in a good condition. The report recommends that buffer zones should be placed between new development and landscape features including Wrights Covert, Bradley Gorse and Bradley Hall moated site. Managed hedgerows both within and along the boundaries of the Site are generally mature and appear to be in a good condition.

The existing trees and mature hedgerows within the Site will be retained and enhanced where possible. Retained trees and woodlands blocks, particularly

along the Site boundaries, will form an important part of mitigating the potential impacts of new development. The landscape proposals will include new woodland belts on earth mounding along the Site boundaries and internal roads which with the Sustainable urban Drainage Scheme will aim to enhance site-wide biodiversity and create new wildlife corridors.

Ecology and Nature Conservation

There are no statutory designated sites within the Site, or within the study area. Four locally designated non-statutory sites are present within 2km of the Site, but no impacts to these are expected.

An 'extended' Phase I habitat survey undertaken in November 2016 identified features of ecological importance comprising:

- Broadleaved Woodland
- Hedgerows
- Ponds
- Scattered Trees
- Watercourses (Bradley Brook and tributary adjacent to Site boundary)

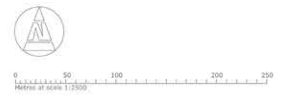
Other habitats comprise improved grassland and arable fields, scrub and tall ruderal. Walkovers of the site have been undertaken since the initial Phase 1 habitat survey in November 2016 and the conditions on site remain the same as the initial survey.

Habitats of ecological importance will be retained wherever possible. Where losses are unavoidable, compensation will be made through the inclusion of replacement planting of similar species within the landscape design including enhancement of boundary features and replacement planting to provide green buffers and open space throughout the Site.

Rev	Date	By	Description
H	02/03/2020	HR	Indicative Road Revised
I	05/03/2020	MMS	Annotation updated



Landscaping to proposed road improvements shown indicatively.



- Planning Boundary
- Existing Trees To be Retained
- Watercourse
- South-North Open Green Corridor
- Watercourse 15m stand off zone
- Mitigation Area (Details to be agreed)
- Proposed Indicative Estate Road. (Any estate road traversing the green corridor east to west should be constructed & built into levels to minimise impact on views and setting of the SAM - Details to be agreed)
- Proposed Infrastructure Trees. (Refer to Layer Landscape Strategy)

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Six 56, Warrington
Green Infrastructure Parameters Plan

CDL Reference: [blank]
Drawing Status: Planning
Date: 15/03/2020
Project No: DWG No: Rev:
16-184 P111 I

Parameters Plans

1.6 Height Parameters

Across the Site, built form will range from 12.5m to 26.5m to haunch and 18.5m to 30m to ridge. The upper range of building heights will be located to the east and south of the site and the lower range to the north and west of the site where the building heights impact is at its least. Zone A will have a maximum of 12.5m (to haunch above FFL). In Zone C and the northern part of Zone B there will be a maximum of 15m (to haunch) above FFL. In the southern part of Zone B there will be buildings ranging from a maximum of 26.5m to 18.5m (to haunch) above FFL and in Zone D a maximum of 18.5m (to haunch) above FFL.

These are maximum unit heights but the final unit heights will ultimately be determined by end user requirements that are driven by commercial demand. The nature of logistics buildings and the myriad of different storage solutions require flexibility of building height.

Maximum building levels will fluctuate across the and are subject to a cut and fill exercise that will create development, The maximum building levels that include the height of the proposed buildings are illustrated on the Heights Parameters Plan and summarised as follows:

- Zone A (83.50 AOD) including buildings 12.5m clear internal height, 16m to top of ridge.
- Zone B1 (84.00 AOD) including buildings 15m clear internal height, 18.5m to top of ridge.
- Zone B2 (83.00 - 91.00 AOD) including buildings 18.5m and 26.5m clear internal height respectively, 22m and 30m to top of ridge respectively.
- Zone C (79.00 AOD) including buildings 15m clear internal height, 18.5m to top of ridge.
- Zone D1 (79.50 AOD) including buildings 18.5m clear internal height, 22m to top of ridge.
- Zone D2 (78.00 AOD) including buildings 18.5m clear internal height, 22m to top of ridge.

Trends in current logistics buildings are promoting increased volume as a product of building height. This is to optimise storage capacity as well as accommodate a range of storage solutions. The range of building heights proposed accommodate the range of building sizes which in turn responds to sensitivities around the perimeter of the site.

Parameters Plans

1.7 Access and Circulation Parameters

Proposed Access

The proposed development will be accessed via two new roundabouts on Grappenhall Lane. The principal roundabout will be at a point approximately 380m to the west of the A50 Cliff Lane / Grappenhall Lane roundabout and a secondary roundabout 350m to the east of the existing Broad Lane / Grappenhall Lane / Barleycastle Lane roundabout.

The roundabouts will be designed in full accordance with design standard TD16/07 of the Design Manual for Roads and Bridges and will accommodate the swept path manoeuvres of high volumes of large HGV vehicles.

An extensive package of mitigation works is proposed at the A50/Cliff Lane roundabout and M6 J20. These are set out in the Environmental Statement. The Site currently benefits from five access points along the B5356 Grappenhall Lane, including one main Site access into Bradley Hall Farm, between the A50 Cliff Lane / Grappenhall Lane roundabout and the western roundabout of the M6 Motorway Junction 20, plus four field accesses along the Site's frontage to Grappenhall Lane.

The main Site access into Bradley Hall Farm also forms part of the Public Right of Way Network (Footpath No 31), which allows a connection through the Site to Barleycastle Lane to the south (where the route becomes Footpath No 23).

Internal Roads

Circulation within the Site is to be detailed at the Reserved Matters stage.

Pedestrian and Cycle Routes

A footway and cycleway is proposed along the length of the Site's northern boundary and frontage with the B5356 Grappenhall Lane. This should be a 3.5m shared cycleway/footway 1.2km in length along this road corridor. Suitable pedestrian and cycle provision will be catered for within the internal Site layout as part of the development of a detailed scheme layout.

The existing Public Right of Way, Footpath 31 follows the line of the current farm access into the Site from the A50 Cliff Lane and continues past the Bradley Hall moated site and to the south of the Site as Footpath 23. It is proposed to retain Footpath 31 in its general extent, although it may require a minor variation to the alignment to provide a safe crossing point across an internal estate road.

Footpath 28 runs east-west across the site from Footpath 23 and 31, to the north of the Bradley Hall cottages, across the fields, before terminating at the field boundary to the western extent of the Site. Footpath 28 will be diverted as part of the Proposed Development. Its diverted route will run along the northern boundary of the site, parallel with the B5356 Grappenhall Lane at the point of the proposed eastern access point. It will then re-enter the site alongside an internal estate road and rejoin Footpath 23.

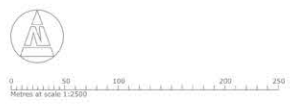
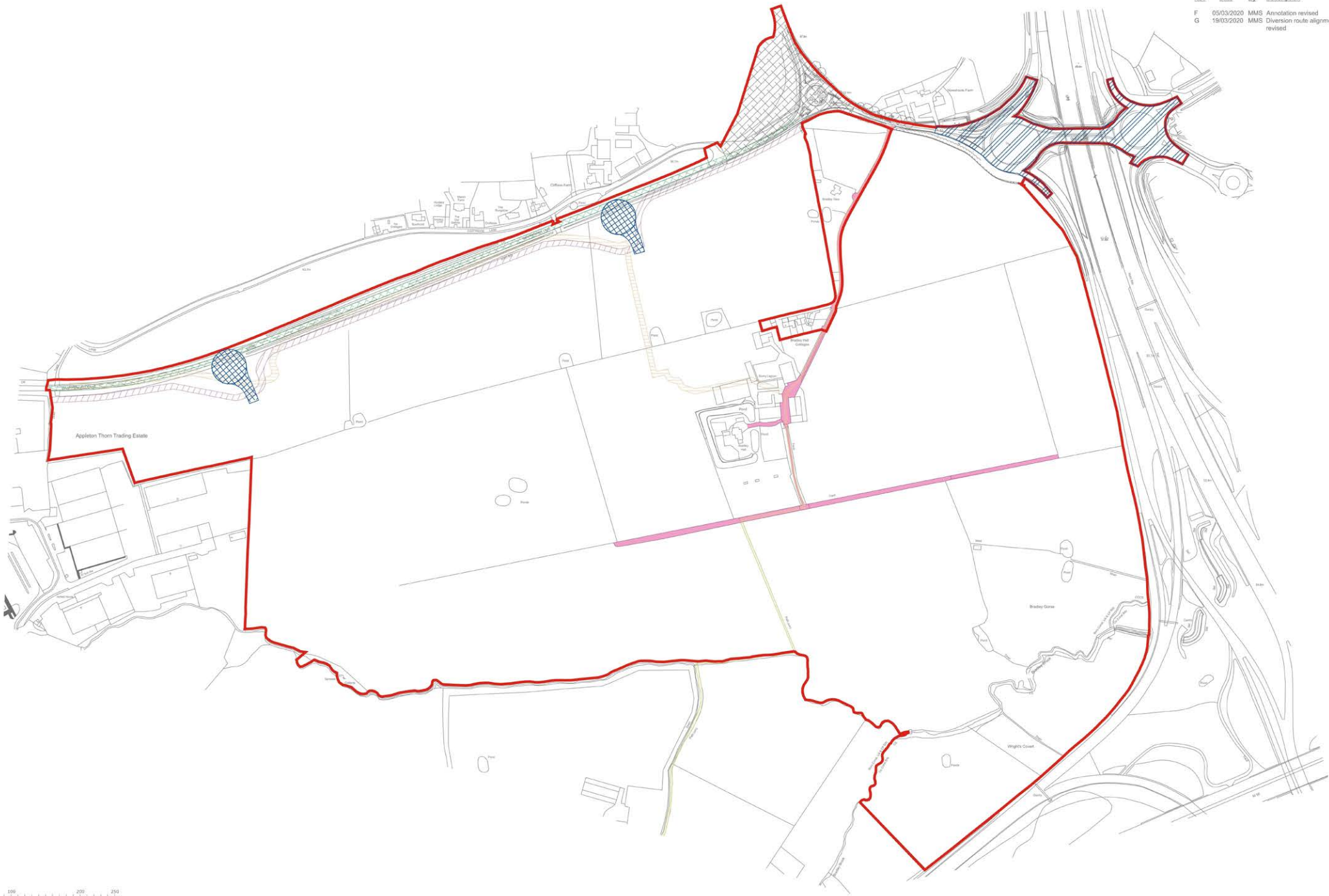
Public Transport

The accessibility of the proposed development via public transport is considered in detail as part of the Transport Assessment and ES.

The potential to improve the accessibility of the Site by public transport will be set out in a Travel Plan Framework submitted as part of the planning application. The internal estate road and link between the two roundabouts will allow buses to penetrate the site with provision of a bus stop within the site.

The nearest railway stations are in Warrington (Warrington Bank Quay and Warrington Central), both situated some 6.5km crow-fly distance from the Site. The stations lie within 8km cycle distance from the Site, making a longer journey by rail / cycle a possibility.

Rev	Date	By	Description
F	05/03/2020	MMS	Annotation revised
G	19/03/2020	MMS	Diversion route alignment revised



- Planning Boundary
- Existing Access road/track
- Diverted PRoW
- 25m Safeguarded Area (for potential highway improvements / road widening)
- Highway Improvements including realignment of roundabout
- Access to the Site
- Existing PRoW
- Proposed Cycle Way (3.5m wide shared footway/cycleway - details to be agreed)
- Highways England/ Highway improvements.

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Six 56, Warrington
Access and Circulation Parameters Plan

Drawn: HR
Team: MMS
Scale: 1:2500 @ A1

Project No: 16-184
Dwg No: P113
Rev: G

Planning
Dwg Reference: 16-184-P113
Date: 02/20

Notwithstanding to whom the works are assigned, the client shall remain responsible for the accuracy and completeness of the information provided to the consultant. The consultant shall not be held responsible for any errors or omissions in the information provided to the consultant. The consultant shall not be held responsible for any errors or omissions in the information provided to the consultant.

Parameters Plans

1.8 Drainage Parameters

Ultimately, each development plot will have its own surface water drainage strategy as well as attenuation of the associated and immediate public realm. A strategy is being developed for plot level and site wide drainage.

Sustainable drainage systems will be used along with greenfield runoff rates for surface water drainage.

Foul water will be pumped to meet United Utilities sewers from a new pumping station within the site.

The Site is wholly within Environment Agency Flood Zone 1 land, classified as land that has a low probability of flooding.

A main EA river network is present on the southern boundary of the Site. A tributary of Bradley Brook originates from Barleycastle Lane flowing west to east before joining Bradley Brook prior to being culverted under the M6. The river continues north through Lymm with eventual connection to the Manchester Ship Canal network.

There are no groundwater abstraction points or primary aquifers within 1km of the Proposed Development.

There are no formal foul or storm artificial drainage connections offsite from the development. The existing drainage assets are limited to the farm house, cottages and field drainage. The waste from the existing properties is collected within an underground system and discharges to a series of local artificial cess pits which are emptied at regular intervals. The storm water drainage from the properties and surrounding infrastructure is collected and conveyed to a combination of ground and overland routes with eventual collection in the Bradley Brook network on the southern boundary. Artificial drainage from the agricultural fields is also present with discharge to various ditches throughout the Site.

The closest adoptable sewer network is located in the industrial estate to the west, under the responsibility of United Utilities. The closest adoptable sewer network with available connection to processing plants is found further south-west within the outer regions of Appleton.

The natural drainage patterns on the Site indicate mainly greenfield runoff toward Bradley Brook. There are also a series of onsite ponds which collect and store water for sub-catchments without positive artificial connections. Bradley Gorse also has an independent natural drainage network which includes ponds and overland connectivity with eventual connection back to Bradley Brook.

The proposed foul drainage strategy is to collect and convey waste via gravity to a central pumping station. This will then be pumped within a rising main west and south along the B5356 with connection to the United Utilities sewer network.

The proposed storm water drainage strategy will see the Site with eventual discharge direct to Bradley Brook at Greenfield Runoff Rate. Storm water will be restricted to GRR from each plot and conveyed to a central SuDS corridor where discharge from the road network will also discharge. Treatment levels will be provided both on plot and in the public realm.

Rev	Date	By	Description
G	05/03/2020	MMS	tees removed from development pitch annotation updated
H	18/03/2020	MMS	drainage configuration revised adjacent to SAM



- Planning Boundary
- Existing Trees To be Retained
- South-North Open Green Corridor
- Mitigation Area (Details to be agreed)
- Proposed zones for detention basins and outfalls (permanent ponds to provide habitats for variety of wildlife - details to be agreed)
- Strategic Landscaping
- Watercourse
- Watercourse 15m stand off zone
- Proposed Infrastructure Trees. (Refer to Layer Landscape Strategy)
- Proposed indicative Estate Road. (Any estate road traversing the green corridor east to west should be constructed & built into the levels to minimise impact on views and setting of the SAM - Details to be agreed.)

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Six 56, Warrington
Drainage Parameters Plan

Drawn: MLL Date: 05/03/2020
Scale: 1:2500 @ A1
Project No: 16-184
Dwg No: P117
Rev: H

Parameters Plans

1.9 Acoustics Parameters

The Acoustics Parameter Plan identifies areas closest to boundaries with residential properties and where external service plant or other noise generating equipment should not be placed, unless it can be demonstrated that appropriate mitigation can be put in place to avoid significant adverse effects on the noise receptors. It also details that in these areas, delivery/loading bays should be orientated away from the Site boundaries and the neighbouring residential properties.

Within the Noise and Vibration Technical Chapter, noise and / or vibration effects on existing sensitive receptors and their occupants during the proposed construction works have been considered:

- Effects on occupants of existing sensitive receptors due to noise from operational activities associated with the operation of the Proposed Development; and
- Effects on occupants of existing sensitive receptors associated with increased noise from changes in traffic flows due to the Proposed Development.

The assessment undertaken for this application has been based on several worst-case assumptions, as final operators for each of the proposed units have not been confirmed.

Future Reserved Matters planning applications should therefore include further assessments on noise impacts, based on confirmed proposals such as building layout, operating procedures, plant requirements, and vehicle flows.

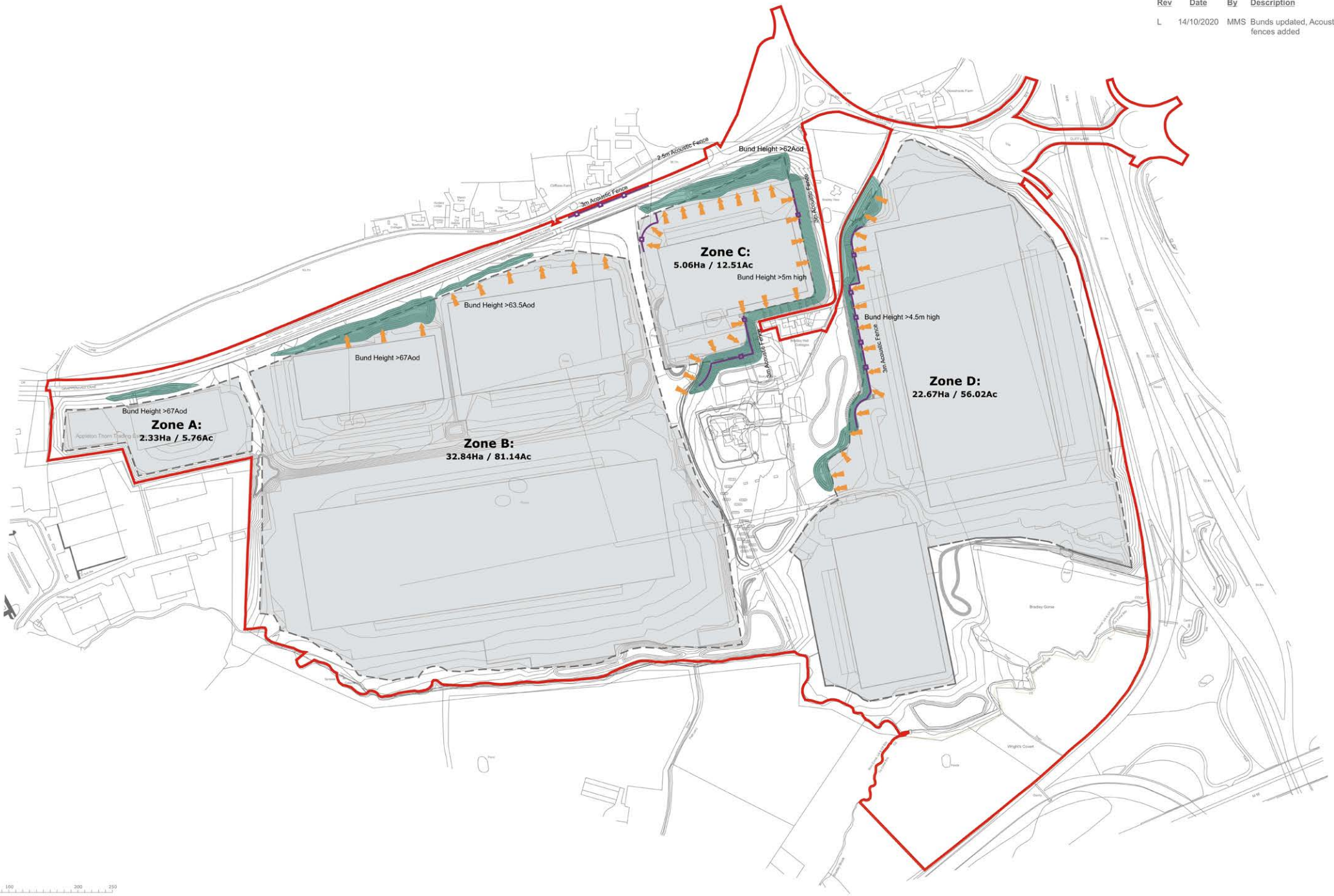
Nevertheless, mitigation measures to limit noise impacts should be adopted as detailed within the Parameters Plans. Measures embedded in the design include:•The orientation of loading bays / docks with respect to sensitive receptors.•The location of services plant to maximize distance from noise-sensitive receivers and the potential screening effects afforded by proposed units.The bunds and acoustic barriers shown on the Updated Acoustic Parameters Plan will be constructed during the construction phase of development.



FIGURE 2.7: NOISE RECEPTOR PLAN

The location and height of bunds provide effective mitigation to attenuate noise egress from the Proposed Development. Additional acoustic barrier screening has also been carefully considered at roadside and bund locations adjacent to Bradley Hall Cottages, which should result in a reduction in specific noise levels at these receptors. The height and location of these bunds and acoustic barriers will be agreed through the outline planning permission and will have having a maximum 1:3 gradient slope to a maximum height of approximately 5m with 3m high acoustic fencing around Bradley Hall cottages and Bradley Hall View (Zone C) and a maximum 1:3 gradient slope to a maximum height of approximately 4.5m with 3m high acoustic fencing around Zone D.

Rev	Date	By	Description
L	14/10/2020	MMS	Bunds updated, Acoustic fences added



OVERALL SUMMARY:

Redline Area: 98.09 Ha / 242.59 Ac
Proposed Use: B8 with ancillary B1(c)
Total Developable Area: 62.99Ha / 155.43 Ac
Total Floorspace: 287,900m² (3,095,023 ft²) GFA

-  Planning Boundary
-  Development Zone Boundary



No loading bays shall be orientated towards noise sensitive receptors along the development cell boundary (identified with orange arrows) unless it can be demonstrated that mitigation measures can be put in place to avoid significant adverse effects at noise sensitive receptors (refer to Cundall noise receptor plan for receptor locations)

Note. bund embankments are a 1 in 3 gradient



Six 56, Warrington
 Acoustic Considerations Parameters
 CDR Reference
 Drawn: HR
 Team: MMS
 Date: 11/2020 @ A1
 Project No: 16-184
 Dwg No: P114
 Rev: L

Parameters Plans

1.10 Heritage Parameters

Bradley Hall moated site is a Scheduled Ancient Monument (SAM) located within the Site boundary, to the eastern part of the site, adjacent to the farm buildings. It comprises the buried and earthwork remains of a medieval moated site for a medieval manor house, which is to be retained. The moated island is partly occupied by the farm house associated with Bradley Hall Farm, which is excluded from the Scheduling, but will be retained and subject of a separate change of use application.

This Heritage Parameter Plan seeks to identify a 30m stand-off and buffer between any built development and the moat which is a heritage asset. The existing Bradley Hall Farm building, which is a locally listed building (non-designated heritage asset), will be retained and subject of a separate change of use application.

A corpus of work has been undertaken to understand the Cultural Heritage Context of the Site including the historical built form including listed buildings, conservations areas, the archaeological resource and the historic landscape within which the Site sits.

The Cheshire Environments Records (HER) have identified a number of archaeological sites and findspots within the area. These have either been recorded through aerial photographs, evaluation/ mitigation or through chance discoveries.

Identified to the southeast of the Site is an elliptical enclosure which may have prehistoric origins. Found to the north of this near to Junction 9 of the M56 Motorway was a prehistoric stone shaft-hole axe. No other artefacts or monuments of this date are recorded within the study area.

Recorded within the northern extent of the Site is a Roman road which heads in an east west direction. Accounts state that it has been traced for over 12km with its alignment dictated by the crest-line of an escarpment of New Red Sandstone which overlooks the Mersey Valley to the north. Evidence for the road has been proven from the study of Tithe and estate maps, parish boundaries, hedge lines, place names, and observations of road material in plough fields.

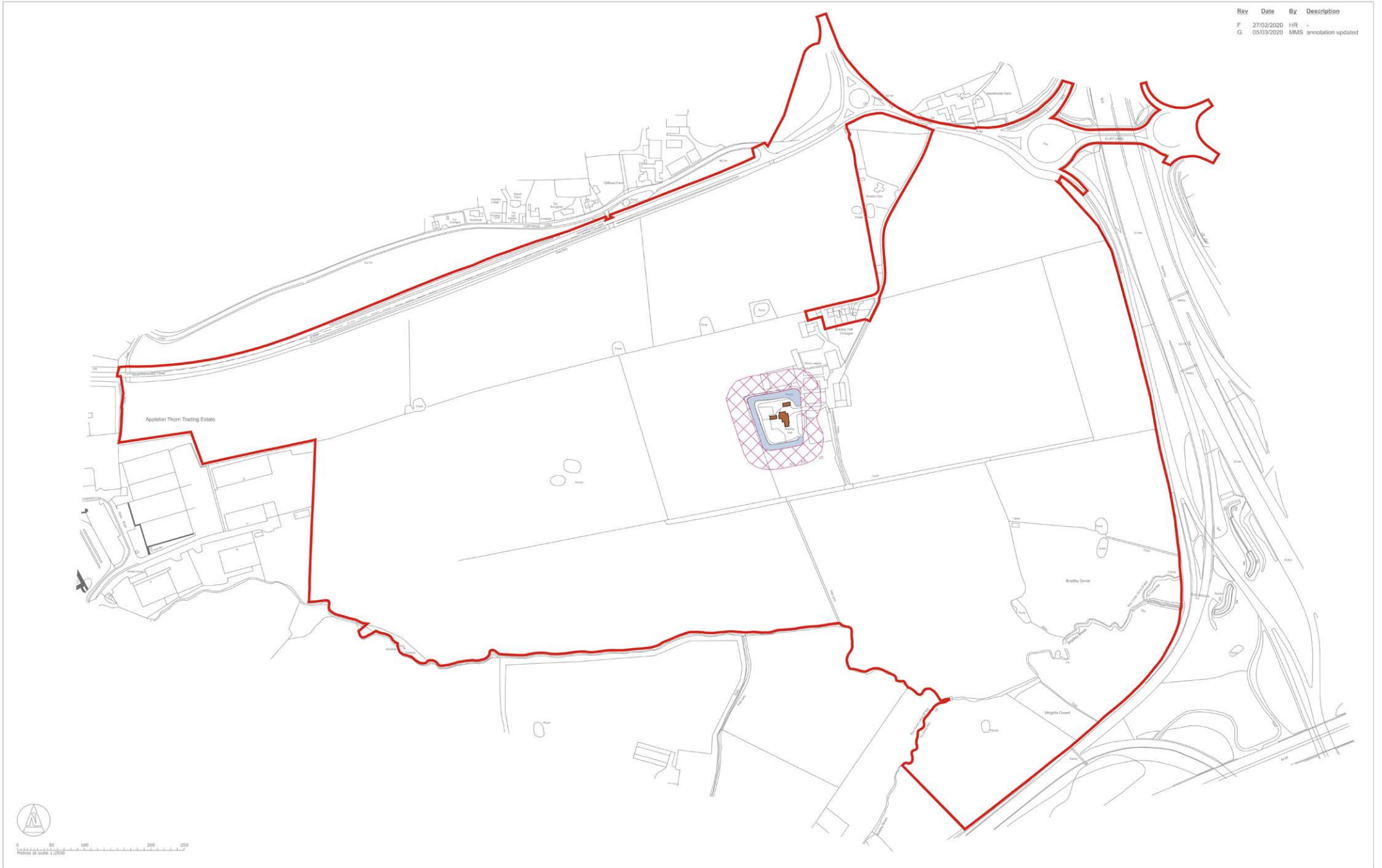
A section through the road was excavated to the west of the site prior to the development of the adjacent industrial estate. At this point the road was found to be 13.5m wide. Accounts suggest that the road continued in use during the medieval period which is in part substantiated by the placement of a cross on the road near to Bradley Hall Medieval moated site.

Designated Assets

Located within the eastern part of the Site is Bradley Hall Moated Site which was designated a scheduled monument in 1991. It comprises the buried and earthwork remains of a medieval moated site for a medieval manor house. The moated island is approximately 70m by 55m and is grass covered in the areas not occupied by buildings. Excluded from the scheduling are the farmhouse, access drive, fences, hedged field boundaries and a telegraph pole.

The moat remains water filled and within the island are two occupation phases which survive beneath the present house and gardens. The moat surrounding the island is c. 10m wide and 2.5m deep. Part of the moat has been disturbed through the creation of an ornamental pond on its east side. Access is currently gained from a causeway also on the east side which replaced an earlier drawbridge.

The original hall within the moat was erected in the early 14th century. Documentary sources refer to it around this time with its first depiction on a map dating to 1735 which shows the hall to the northeast of its current position and the moat extending beyond its present location. The hall shown on the aforementioned map replaced that erected in the 14th century. Between the early 18th and the early 19th century the hall was considerably altered as was the location and extent of the moat. Analysis of later maps shows the addition of a number of outbuildings to the hall as well as a number of agricultural buildings immediately to the northwest of the moat.



- Planning Boundary
- SAM 30m Buffer Zone. No new buildings to be built or encroach into this zone.
- Scheduled Ancient Monument (SAM)
- Existing building to be retained (subject to separate change of use application)

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Six 56, Warrington
Heritage Parameters Plan

CDR Reference: 16-184

Drawn: HR	Checked: HR	Project No: 16-184
Scale: 1:2500 @ A1	CDR Reference: 16-184-112	Project No: 16-184
	CDR Reference: 16-184-112	Dwg No: P112
		Rev: G

We warrant the accuracy and reliability of the information contained in this document as far as we are aware of at the time of its preparation. We do not warrant the accuracy, reliability, or completeness of the information contained in this document for any other purpose or for any other use.

Parameters Plans

1.11 Demolition Parameters

This Demolition Plan identifies the extent of the existing buildings on site proposed for demolition on site. These comprise the complex of farm outbuildings associated with Bradley Hall Farm.

Existing Services Arrangements

The existing Site has the following services that will either be disconnected and / or diverted to facilitate the proposed development:

- Electrical services (Low Voltage only)
- Telecommunication services
- Water services

The existing electrical services comprise an overhead low voltage cable that runs south from the B5356 Grapenhall Lane, across the site to Barleycastle Lane. The cable serves Bradley Hall, an on-site telephone mast, adjacent to Bradley Gorse, and properties on Barleycastle Lane.

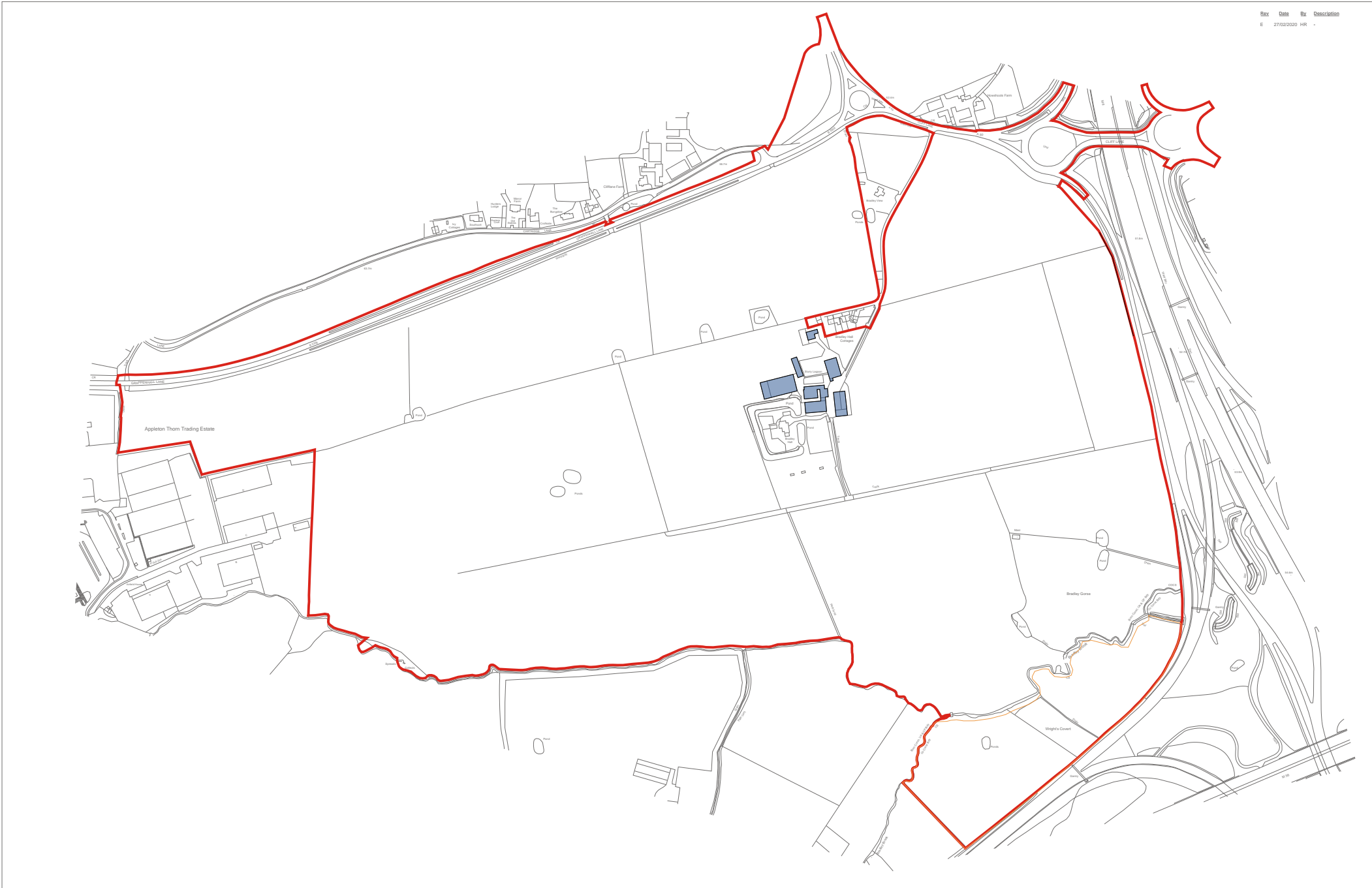
The Electrical supplies to the existing site will be disconnected and the existing services on Barleycastle Lane shall be re-fed from new supplies to the south of the Site. Should the residential properties adjacent to Bradley Hall Farm be retained, new services will be installed.

The telephone mast will be re-fed by a new supply via underground cabling from the proposed development.

The existing telecommunications services feed the existing residential properties adjacent to Bradley Hall Farm, these services will be disconnected back to B5356 Grapenhall Lane or new services installed to the residential properties.

The existing water services feed the existing residential properties adjacent to Bradley Hall Farm, these services will be disconnected back to B5356 Grapenhall Lane or new services installed should the residential properties. The existing Gas, Electric and Telecomms services running along Grapenhall Lane / A50 are not envisaged to be affected by the re-aligned roundabout at the junction of Grapenhall Lane / A50.

The existing Water service running along Grapenhall Lane / A50 will require re-routing to facilitate the re-aligned roundabout the re-aligned roundabout at the junction of Grapenhall Lane / A50.



- Planning Boundary
- Buildings to be demolished as part of the proposed development

Langtree **SGP**
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PANATTONI

Six 56, Warrington
 Demolition Parameters Plan

Client Reference	Drawing Status	Project No:	Dwg No:	Rev:
Drawn: HR	Checked: MS	16-184	P118	E
Team: MS	CAD Reference: 16-184-P118			
Scale: 1:2500 @ A1	Date: 02/20			

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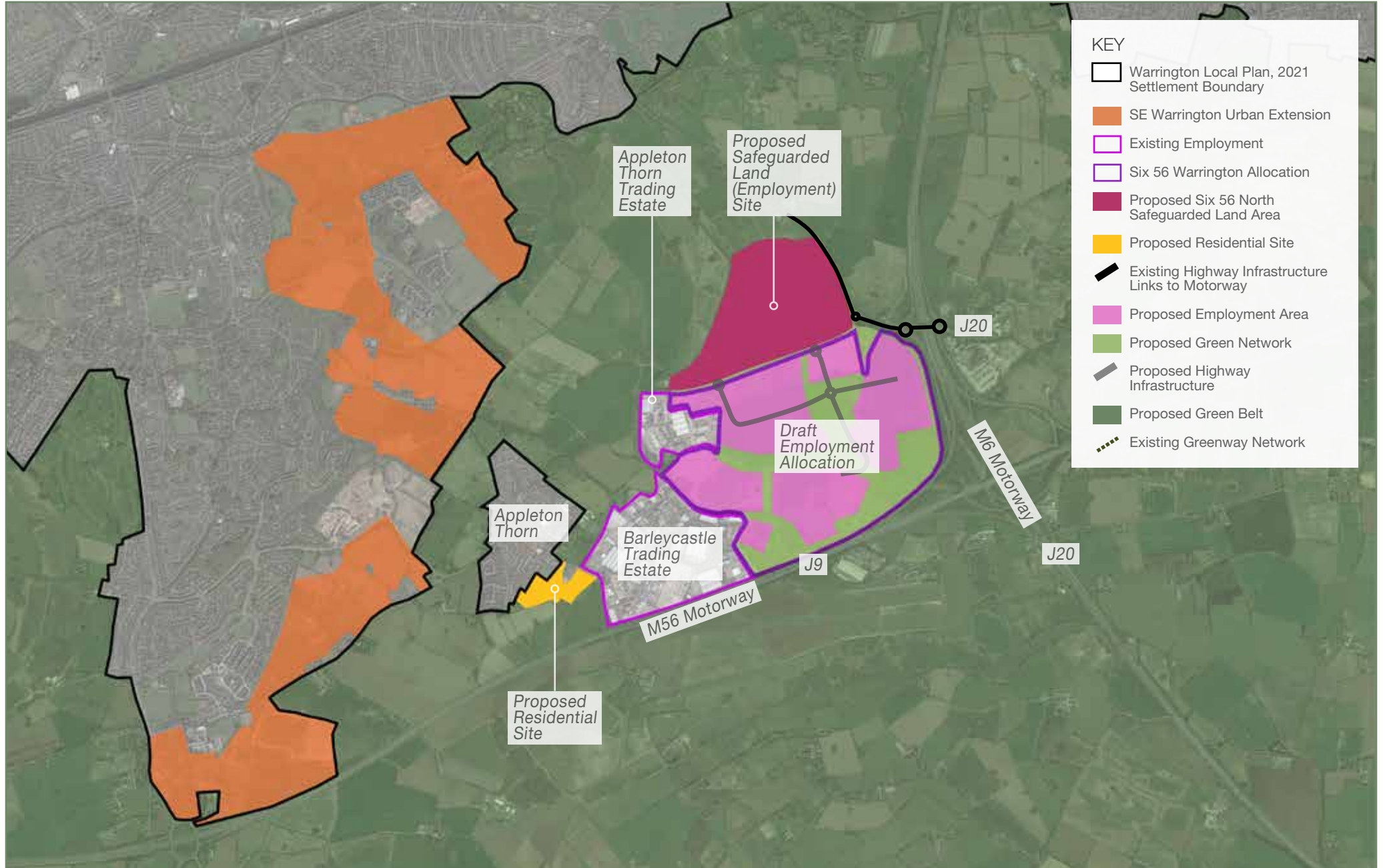
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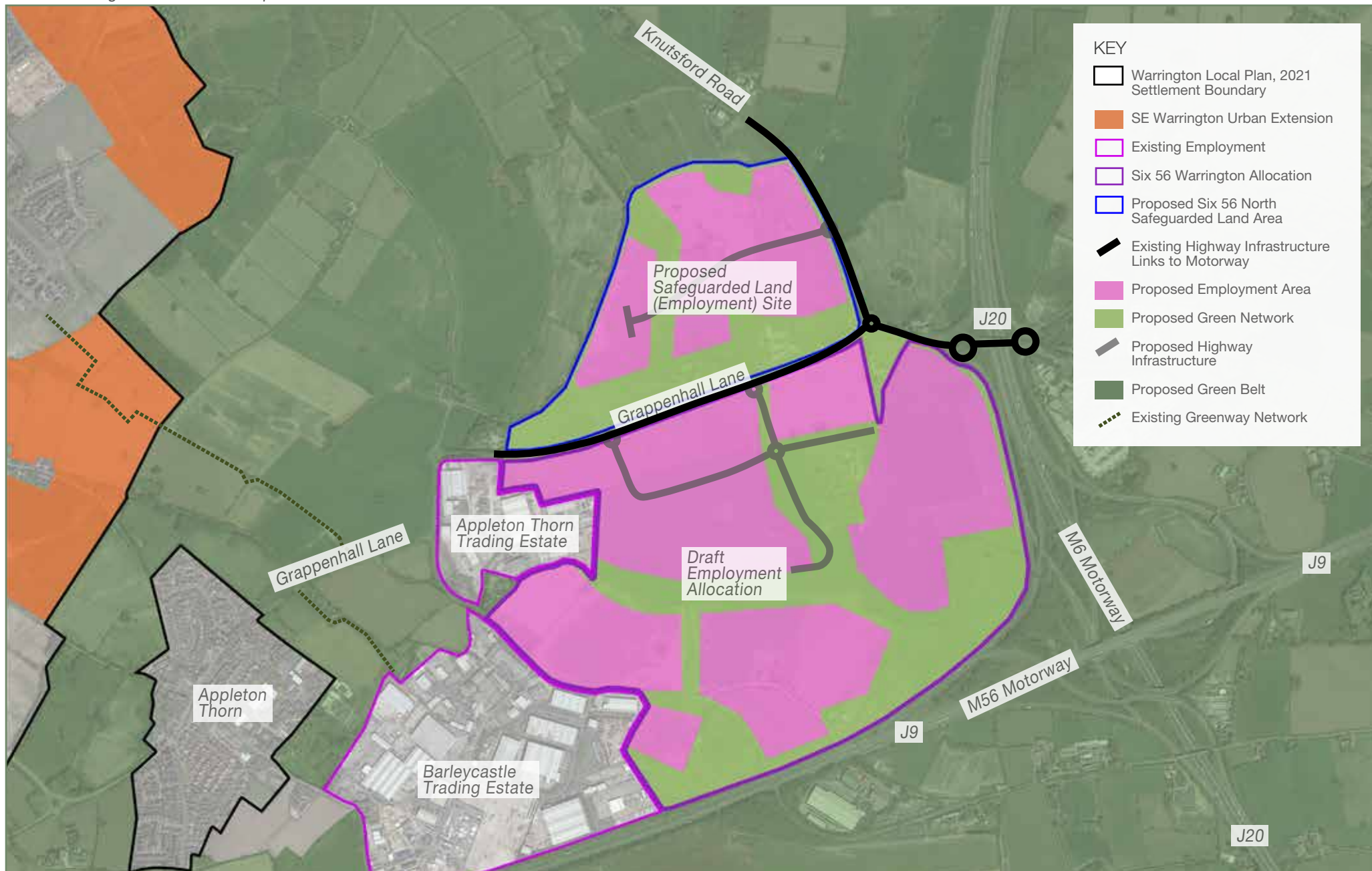
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Appendix 2: Site Plans for Six 56 Phase II and Arley Road, Appleton Thorn



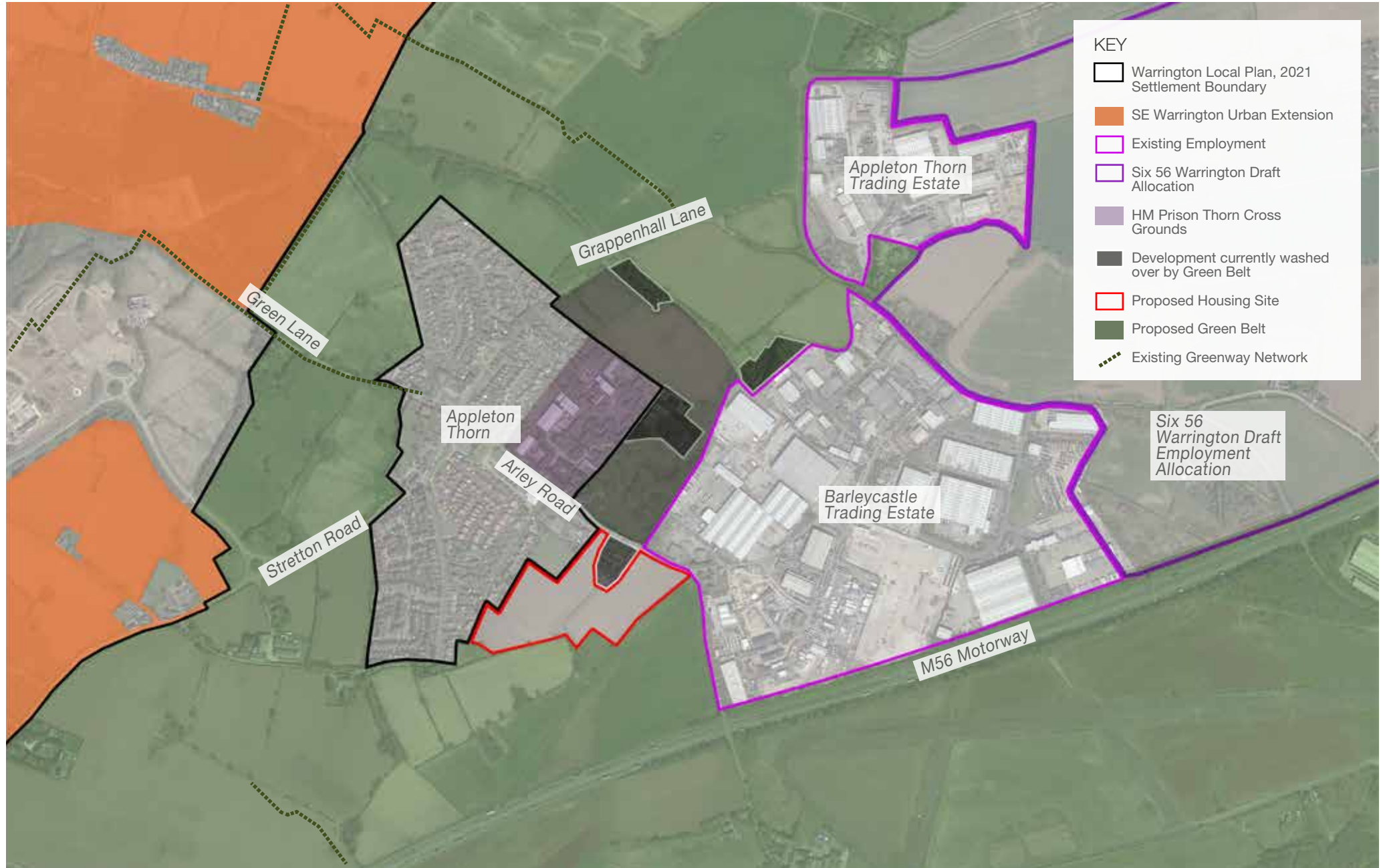
South-East Warrington



Six 56 Phase II




Six 56 Phase II



Land South-West of Arley Road



KEY

 Proposed Green Belt

Land South-West of Arley Road