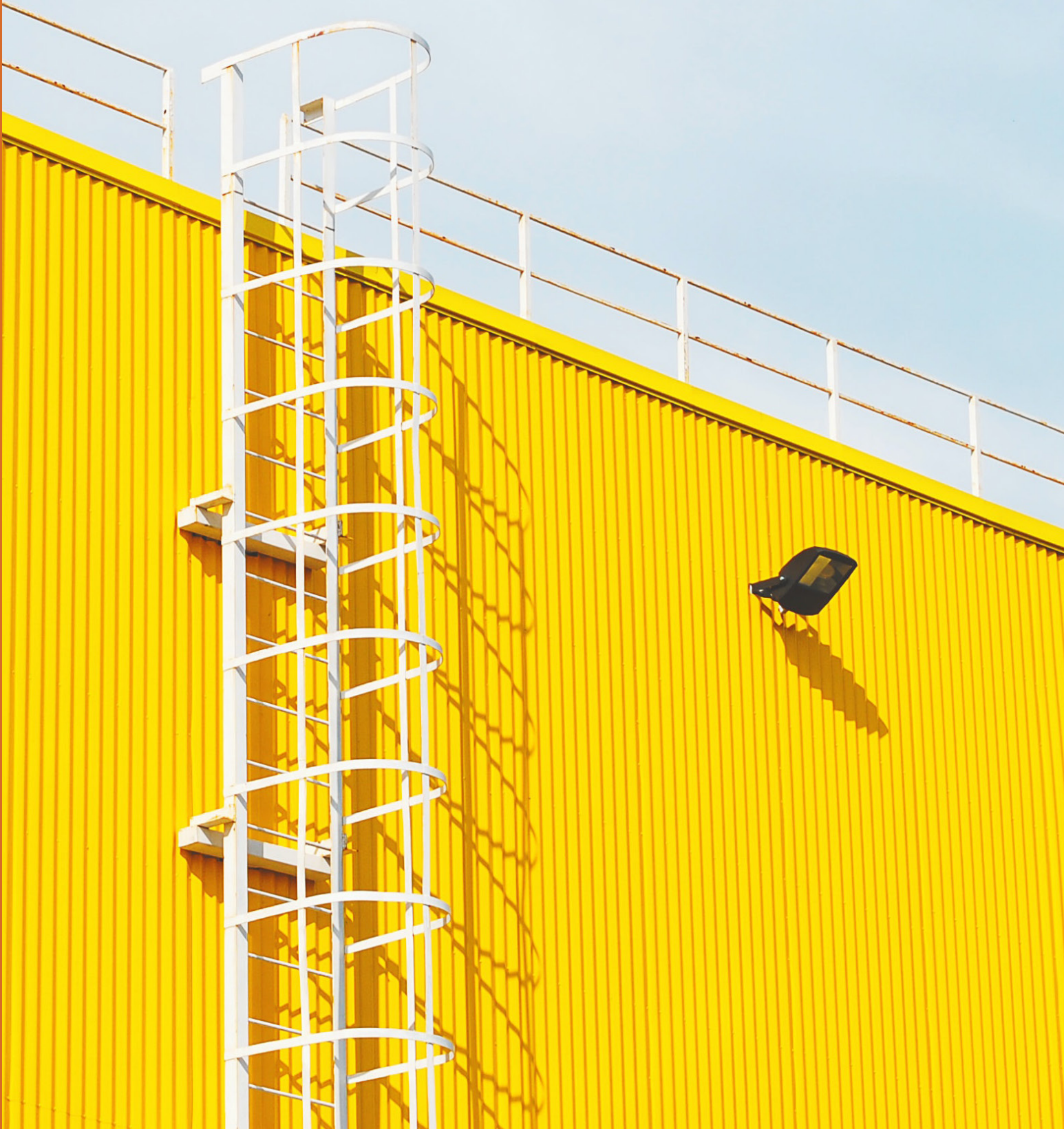




ST.MODWEN

WARRINGTON RIXTON - J21 OF THE M6

November 2021



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1. EXECUTIVE SUMMARY

INTRODUCTION

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

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

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

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

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

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

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

We summarise each in turn below.

MEETING THE IDENTIFIED NEED FOR EMPLOYMENT DEVELOPMENT

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

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

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

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

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

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

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

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

THE DEVELOPMENT OF THE SITE IS DELIVERABLE

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

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

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

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

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



EXECUTIVE SUMMARY CONCLUSION

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

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

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

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

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

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

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

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



2. INTRODUCTION

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

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

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

THE CASE FOR THE PROPOSAL

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

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

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

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

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

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

THE STRUCTURE OF THE DOCUMENT

The Document is structured as follows:

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



THE PROFESSIONAL TEAM

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

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

ONGOING DIALOGUE

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

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

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

3. BACKGROUND TO ST MODWEN

ST. MODWEN DEVELOPMENTS

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

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

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

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

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

Branston Leas & Burton Gateway, Staffordshire

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

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

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

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

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

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

St Modwen Park, Chippenham

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

Glan Llyn, Newport, Wales

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

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

Longbridge, Birmingham

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

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

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

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

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

4. SITE OWNERSHIP DETAILS

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

OWNERSHIP

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

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

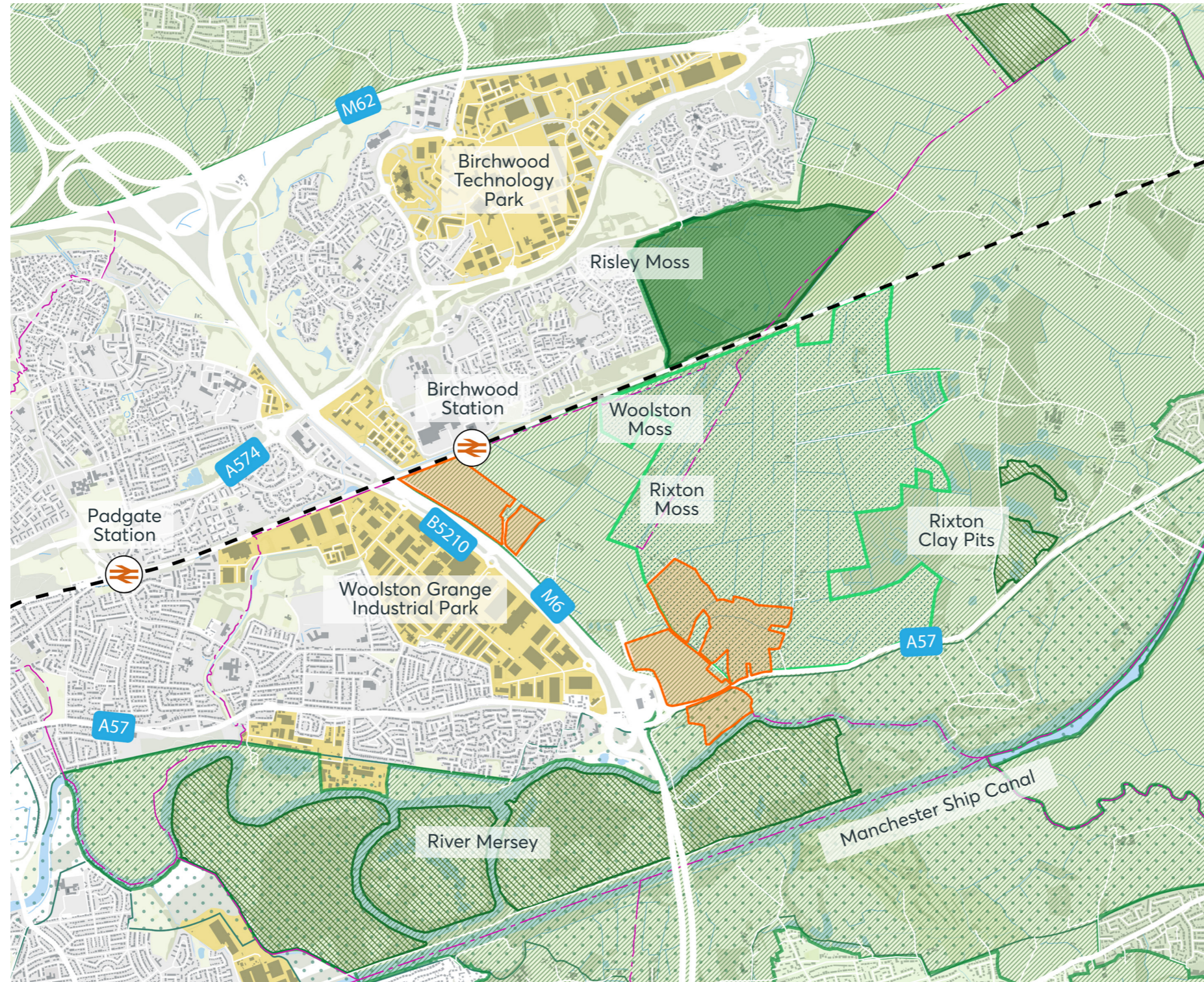


THE SITE IN QUESTION IS **SHOWN OPPOSITE.**



5. SITE DESCRIPTION INCLUDING CONSTRAINTS

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



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

SITE LOCATION

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

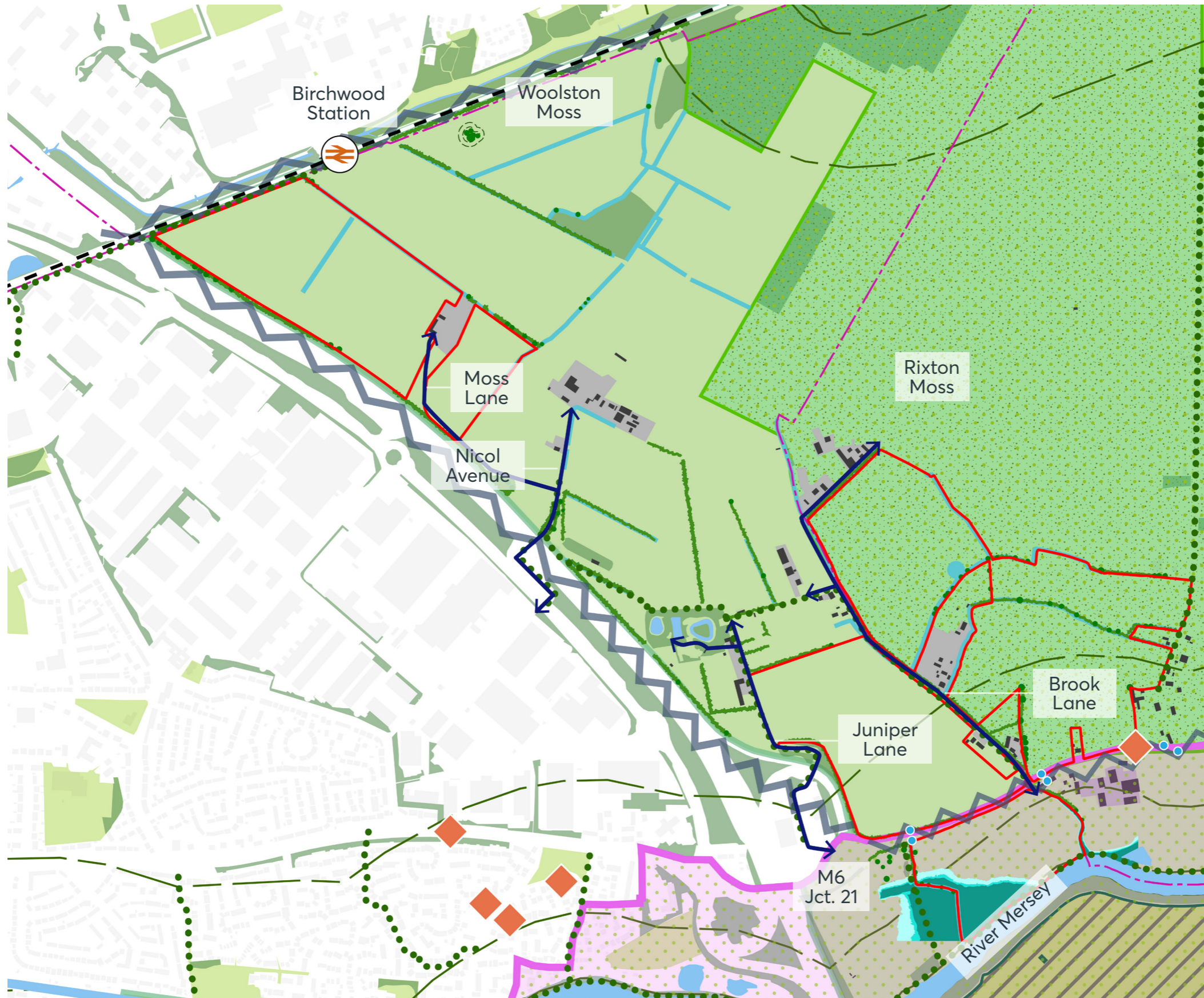
Junction 21 is also located equidistant between the M56 to the south and the M62 to the north that provides access to further conurbations in the surrounding north west area including Manchester, Salford, Liverpool, Chester and St. Helens.

SITE DESCRIPTION

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

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

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



SITE AND SURROUNDING FEATURES

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

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

6. THE PROPOSAL

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

A FRAMEWORK MASTERPLAN FOR THE PROPOSAL IS OPPOSITE.

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


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

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

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

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

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

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



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

INTRODUCTION AND SUMMARY

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

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

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

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

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

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



ASSESSMENT

Industrial & Logistics Requirements in Warrington

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

- **The Look-back Period is Too Long:** the look-back period over which average take-up (demand) is calculated runs for 24 years from 1996 to 2020. This is far too long a period over which the demand drivers underpinning I&L need, and the characteristics of the sector itself, have changed significantly. For example, the last decade has seen a significant increase in online shopping from 2.8% in 2006 to 19.1% in February to 2020. The Covid-19 pandemic has accelerated this trend further with online shopping currently sitting at 25.9% of all retail sales (September 2021). Growth in online retailing has a direct impact on I&L demand as going online requires 3 times the amount of warehouse floorspace compared to traditional bricks & mortar shops. Such a long look-back period also dampens the impact of other, more recent, growth drivers for I&L demand such as increasing UK freight volumes, UK companies bringing their operations back to the UK to avoid Brexit related supply chain shocks and continued business and housing growth in Warrington and the wider FEMA. Finally the inclusion of the Global Financial Crisis ('GFC') in the 24 year look back period also undercuts historic demand as this resulted in a systematic impact to the entire UK economy. In the years immediately following the GFC, I&L demand in Warrington was negative (-91,411 sq. ft net absorption per annum) vs 638,000 sq. ft of net absorption per annum since 2012.

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

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

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

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

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

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

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

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

Advantages of developing the site, including:

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

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



Economic Benefits & Social Value

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

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

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

CONCLUSION

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

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

8. THE CASE FOR THE RELEASE OF GREEN BELT LAND

INTRODUCTION

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

ASSESSMENT

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

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

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

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

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

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

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

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

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

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

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

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

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



1. Table 46 of the EDNA

9. HIGHWAY CONSIDERATIONS

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

Introduction

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



A57 Manchester Road

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

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



Accessibility

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

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



Road Safety

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



Traffic & Access Appraisal

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

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

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



Access Strategy

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



Assessment Summary

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

10. ECOLOGICAL AND ENVIRONMENTAL CONSIDERATIONS

INTRODUCTION

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

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

DEFINITION OF TERMS

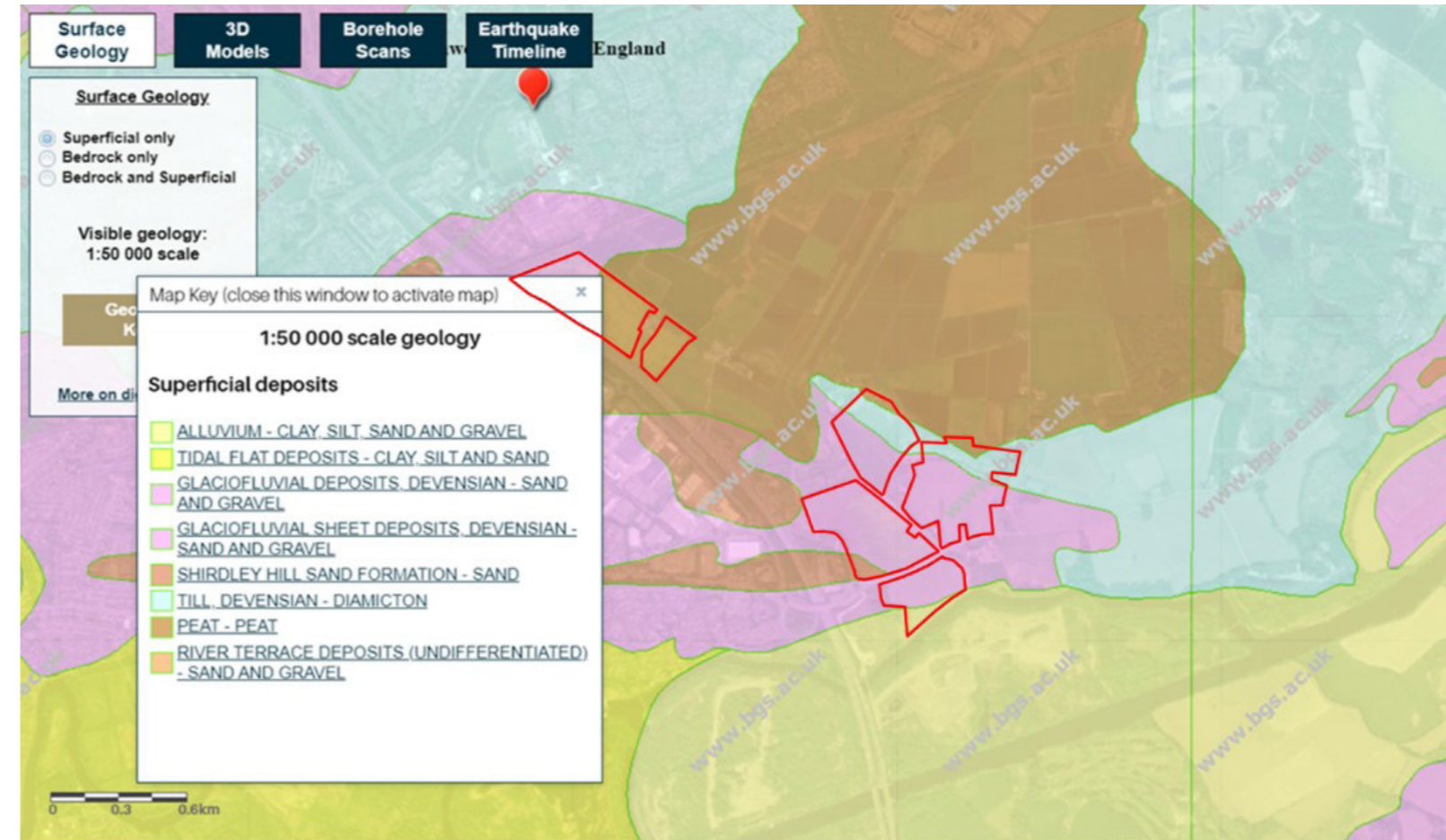
The term 'site' is used to refer to the six parcels of land denoted by the red line boundary on the image below.

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

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



Red Line Boundary



Peat and Sand and Gravel Plan

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

PEAT CONSIDERATIONS

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

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

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

HABITAT REGULATIONS ASSESSMENT

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

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

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

ECOLOGICAL CONSIDERATIONS

Breeding and Wintering Birds

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

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

Local Sites / Priority Habitats / Species

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

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

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

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

Other Protected Species

Great Crested Newts *Triturus cristatus*

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

Water Vole *Arvicola terrestris*

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

CONCLUSION

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

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

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

11. FLOODING AND DRAINAGE CONSIDERATIONS

INTRODUCTION

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

FLOODING CONSIDERATIONS

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

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

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

DRAINAGE CONSIDERATIONS

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

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

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

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

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

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

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

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

12. TECHNICAL ENGINEERING CONSIDERATIONS

CONSIDERATION

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

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

Superficial deposits comprise:

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

Bedrock Strata Comprises:

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

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

GROUNDWATER

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

LAND USE INFLUENCES

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

GENERAL CONCLUSIONS

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

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

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



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

THE PLANNING CASE FOR THE ALLOCATION

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

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

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

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

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

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

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

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

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

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

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

However, Table 46 considers that:

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

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

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

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

THE PROPOSED ALLOCATION

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

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

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

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

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

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

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

1. Table 46 of the EDNA

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

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

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

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

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

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

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

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

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

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

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



Framework masterplan

