GREATER MANCHESTER SPATIAL FRAMEWORK

(REVISED DRAFT, JAN 2019) CONSULTATION RESPONSE

DESCRIPTION: REPRESENTATION IN RELATION TO PROPOSED ALLOCATION 48 (JUNCTION 25), WARRINGTON ROAD, WIGAN.

LOCATION: LAND WEST OF THE A49 WARRINGTON ROAD, WIGAN.

RELEVANT PLANNING APPLICATIONS:

A/80/14787; A/88/29725; A/89/32428

OUR REF: WIL4343/1
STATEMENT OF AUTHORSHIP

This document is prepared by County Planning Ltd, a chartered town planning consultancy regulated by the Royal Town Planning Institute. It is authored by company Director, Dan Matthewman LLB (Hons) MSc ACILEx MRTPI who holds over a decade of planning experience, including advising on leisure, energy and industrial development projects nationally.

The statement is provided having undertaken site visits and after considering information and technical advice in relation to ecology, highways, land quality, drainage and coal mining risk.

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REPRESENTATION TO GMSF 2 – PROPOSED ALLOCATION 48, LAND WEST OF THE A49 WARRINGTON ROAD, WIGAN, WN3 6XB.

RE: PROPOSED ALLOCATION OF LAND FOR EMPLOYMENT USE AND DEVELOPMENTS

LOCATION: LAND WEST OF THE A49 WARRINGTON ROAD, WIGAN

1. INTRODUCTION

1.1 This document is a supporting representation in relation to the proposed Allocation 48 of the Greater Manchester Spatial Framework (Revised Draft, Jan 2019) (GMSF2).

1.2 Allocation 48 is situated west of the A49 Warrington Road, in the Borough of Wigan adjacent to Junction 25 of the M6 Motorway. We are instructed by the freehold landowner of an approx. 6ha area of land within the wider proposed allocation (see Appendix A).

1.3 This representation supports the proposed release of the land from the green belt in order to provide new employment development, together with associated infrastructure, access and drainage. This representation submits that there is a compelling need for the region and the Borough of Wigan in particular, to meet a significant requirement and demand for large format logistics and employment land close to the M6 motorway.

1.4 Due consideration has been given to the potential constraints to development, in particular the requirement to preserve easements for existing utilities infrastructure across the site. In addition to this representation, two potential site layouts and detailed bespoke reports in relation to highways/access and land quality are provided in support.

1.5 The landowner supports the proposed development of the land and having sought expressions of interest, it is clear that there is a market demand for the site. We and interested parties consider Allocation 48 to be suitable and deliverable for up to 158,000 sq. m of employment generating uses including B1(c) Research, B2 General Industrial, B8 Storage and Distribution, together with a petrol filling station and drive-through.

1.6 This statement concludes that releasing the land from the greenbelt is justified and proportionate and necessary to meet the Borough’s employment land requirements.
Summary of consultation comments

1.7 This representation sets out our clients support for the allocation; however, we consider that it would be beneficial to delivery of the allocation to slightly amend two of the criteria:

Criterion 1) Provide a high-quality location for around 140,000 sq.m of B2 and B8 employment floorspace with integrated landscape design and planting.

Our master planning for the site indicates that the land at Derbyshire House Farm has an indicative capacity to provide circa 24,000 sq.m GIA of floor space. Combined with the current DB Symmetry proposals, this results in a capacity of approx. 158,000 sq. M (1,696,000 sq. ft). The Allocation’s indicative capacity should be increased to allow the most efficient use of the land.

It should further be noted that the high-pressure gas main utilities constraints on the land belonging to Derbyshire House Farm indicate that medium sized units of circa 5000 sq. m each will be needed to allow relevant Easements to be provided. This will provide a transitional layout and massing from the smaller Wheatlea Industrial Estate to toward the larger DB Symmetry site which proposes units in excess of 9,000sq. m.

The utilities constraints of the site also invite consideration of alternative employment generating uses which would be complimentary to the large format logistics warehouses being proposed. Such developments which may include a petrol filling station, discount food retail unit and drive through coffee shop. These uses, combined with B2 and B8 uses would make efficient use of the land and assist with the delivery of the strategic allocation. In light this, we submit that the wording of the final version of point 1 could be amended to allow up to 2,500 sq. m of A1; 1,500 sq. of B1 (c) and 380sq.m of A1/A3 drive through coffee shop in addition to a petrol filling station.

Criterion 4) Enable provision of an internal road connection to Wheatlea Industrial Estate

The submitted highways reports, both that in support of this representation and the current planning application being progressed by DB Symmetry demonstrate safe and adequate highways access can be provided without this connection road.

Should the Council and other third-party landowners be willing to collaborate to achieve this on a quid pro quo basis, our client would be minded to consider this positively. However, we would reiterate that the evidence we have provided demonstrates this linkage is not strictly necessary. As such, we submit that this formal requirement should be deleted, or at very least rephrased so as to make it voluntary preference.
2. STRATEGIC LOCATION

2.1 Proposed Allocation 48 is situated west of the A49 Warrington Road, East of the M6 motorway and north of the M6 motorway spur. It adjoins the existing Wheatlea Road industrial estate on the northern boundary and residential areas off Tan House drive, although the proposals include a stand-off of approx. 125m from the nearest dwelling.

Fig.1 – Indicative aerial photo of application site ©GMSF Proposals Map (2019):

![Map showing proposed allocation]

Proposed allocation shown edged red (plan not to scale).

2.2 The site is presently characterised by its use as farmland, with direct access taken from Warrington Road on the eastern boundary via a farm track to Cranberry Ley Farm and a secondary access directly onto the northernmost section via an existing farm gate.

2.3 The location is well served by existing transport infrastructure including the M6 motorway and the A49 Warrington Road which is a major thoroughfare serving the urban areas and providing connections to the town centre and further afield. The Junction 25 proposed strategic allocation provides an opportunity for a substantial employment site for manufacturing and distribution etc within the M6 corridor. Its proximity to Junction 25 makes it particularly attractive for logistics operators, but also for high quality manufacturing and a potentially wider diversity of employment generating uses which could be co-located in this part of the borough.
3. RELEVANT PLANNING HISTORY

3.1 The planning application history is relevant as this clearly establishes the evidence of an ongoing need for new employment land and expansion and amendments of sites in this location over a sustained and prolonged period between 1971 and 2015.

3.2 The industrial estate was developed on land formerly belonging to Wheatlees Farm (now Premier Inn and Brewers Fayre) following the grant of Outline planning permission in 1980. It was extended again with the construction of the ASDA distribution warehouse in 1988.

DB Symmetry planning application

3.1 There is a current hybrid planning application A/18/85947/MAJES (submitted Aug 2018) in response to a shortfall in employment land. It proposes 64.82ha development of full permission for 133,779 square metres (sq. m)/1,440,000 sq. ft of employment floor space of Use Class B8 with ancillary integral Use Class B1a floor space. The application is currently awaiting determination and a decision is expected in May/June 2019.

3.2 The following considerations about the scheme are of significant note:

a) It proposes direct access from the A49/M6 Spur roundabout and the installation of a traffic signal controls to assist with reducing congestion and easing traffic flows. This will both ensure that the proposed land allocation does not have an adverse impact on existing traffic conditions and help ease congestion at the ‘Bryn Cross’ crossroads which is stated by the Council as being a major constraint on access to the South Lancashire Industrial Estate, situated to the south;

b) The scheme preserves the possibility of an all ways access to the M6 motorway which is to be funded and progressed by Highways England;

c) The layout provides a substantial stand-off from the residential areas of Winstanley, with a minimum separation distance of 195m, extending to over 380m in parts;

d) It includes provision of new and improved public rights of way which will enhance connectivity of the proposed development to residential areas from which employees can commute using sustainable methods of transport;

3.3 In combination, the evidence presented, and details of the proposal being progressed by DB Symmetry demonstrate the developer’s confidence in the market and the need for additional employment land. It reinforces the deliverability of the allocation overall.
4. PLANNING POLICY CONTEXT

4.1 The following section of this statement considers the planning policy context of the development site and the Wigan M6 corridor as a sub-region more widely.

4.2 The statutory development plan, for the purposes of Section 38 of the 1990 Planning Acts (as amended) comprises its Core Strategy Local Plan and saved policies from its Unitary Development Plan, which pre-date the National Planning Policy Framework (NPPF). Together, these set the planning policy context and the strategic priorities against which planning applications are assessed.

4.3 The Council has not adopted an Allocations Plan due to its intention to review its green belt and the allocations through the GMSF. The Stage 1 consultation (2016) had been expected to complete, whereas it has been since redrafted and re-consulted on (2019). Consequently, the Council’s local plan allocations are out of date, albeit the evidence base has been updated through its recent Employment Land Position Statement (Jan, 2019). As such, allocations and the green belt are now being reviewed through GMSF 2.

4.4 The proposed Allocation 48 is within the green belt but at a site-specific level, it is not subject to any other specific designations within the adopted Core Strategy. The Council’s Core Strategy green belt policy CP8 reflects national policy in the NPPF. Paragraphs 136-138 of the NPPF set out the approach that planning authorities should follow to justify releasing land from the green belt. In particular, paragraph 136 states:

*Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*

4.5 Although the site is outside the delineated settlement boundary, it was previously designated as a North West Objective 2 Programme. The Programme offered funding streams of up to 50% of a project’s costs which aimed to promote the economic and social convergence of areas facing structural difficulties and undergoing socio-economic change in the industrial and service sectors. This is representative of the long-term ambition to improve social and economic conditions of the area.
5. **EMPLOYMENT LAND NEED CASE**

5.1 The proposed allocation adjoins the Wheatlea Road industrial estate which is a 20.4ha Primary Employment Area (EM1A) identified in the Wigan Council Core Strategy Local Plan policy CP5. This Core Strategy policy seeks to improve and retain the employment generating uses in key locations, identifying a range of key ‘growth’ sectors such as ICT Digital, creative / digital / new media, environmental technologies as well as logistics and manufacturing uses. This aspiration is supported by national policies in the NPPF.

Fig.2 – Location relative to existing employment sites. ©Wigan Council adopted policies map:

5.2 The NPPF, at paragraph 80, places considerable emphasis and significant weight on the need to support economic growth, and productivity. This includes, amongst other things, “allow[ing] each area to build on its strengths, counter any weaknesses and address the challenges of the future”.

5.3 Paragraph 82 notes that “Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

5.4 It is clear that Allocation 48 will draw considerable support from these paragraphs which are highly pertinent and directed at the nature and scale of development in question.
5.5 Paragraphs 80, 82 and 136 of the NPPF are especially noteworthy as the proposed Allocation 48 purposefully aims to overcome some strategic weaknesses in the region caused by a lack of alternative access to the M6 corridor. Simultaneously it promotes growth and productivity by helping to meet the employment needs of the borough. The GMSF consultation paper describes this clearly at paragraph 11.330:

11.330 - The M6 is a major business asset. It is the UK’s most important strategic route for freight movement between the north and south of the country, and Wigan is the only district in Greater Manchester which has direct access to it. The site is large, relatively unconstrained, directly accessible to the motorway and has a long visible frontage along it. These attributes make the site highly attractive to the market, including key growth sectors such as logistics and advanced manufacturing which are growing rapidly in the North West, primarily due to its strong global connections including Manchester Airport and the new deep water port at Liverpool 2.

Para 11.330 of GMSF Revised Draft, Jan 2019

5.6 The Council’s latest Employment Land Position Statement (January 2019) (ELPS) identifies that the borough has 149.94 hectares of available employment land as at 1 April 2018. However, there is currently considerable uncertainty about the deliverability of around two-fifths (41%) and the market demand goes unmet within Wigan Borough.

5.7 Whilst the Wheatlea industrial estate has been subject to planning applications to renew existing buildings and provide additional floor space, there is no notable remaining capacity within the estate to meet the Borough’s requirements for large format logistics and manufacturing without releasing further greenbelt land. This is confirmed by the ELPS which notes that there are many vacant units which are unattractive to, and unsuitable for, larger Class B2 and B8 uses due to their size, access and location. As a result, many have remained vacant or have been lost to alternative uses or housing developments.

5.8 Consequently, the ELPS ultimately determines that: “There are currently no available sites in Wigan Borough that can match the large-scale employment sites that are being offered in neighbouring authorities.” Consequently, it finds that the borough is missing out on opportunity to compete with other significant logistics and industrial locations within the M6 corridor. Key to the success of those regionally significant economic developments is that they take advantage of their accessible locations with good motorway access.

5.9 In conclusion, Allocation 48 is one of the borough’s best and most favoured opportunities to compete and offer quality local job opportunities in Wigan and Greater Manchester.
Economic, Social and Environmental dimensions

5.10 The council’s evidence base indicates that 59,800 residents leave the borough every day to access jobs with a net outward commute of 32,186, meaning that almost twice the number leave the borough for work than commute in. This equates to 29% of the working population leaving the borough every day to work in other towns such as Bolton, Warrington and Salford and is of the highest outbound commuter numbers in the Greater Manchester region. It further shows that employment land take-up over the last decade has been comparatively slow. The reasons given are that the current land supply is either too small, too long term or in the wrong locations to attract significant investment. As a result, opportunities for business and jobs are not being delivered.

5.11 The proposed Allocation 48 and its subsequent construction are a clear and un-paralleled opportunity to attract both external and inward investment to the borough and provide a range of jobs at all levels, both on site and locally. It would yield approximately:

- Up to 158,000 sq. m GIA of additional employment floor area
- 1,864 new jobs;
- £85.5 million in construction investment;
- £3.39 million in annual rates payable to the Council

5.12 Thus, there are both strong economic and social reasons to provide increased job opportunities and particularly jobs which would overcome local market conditions that result in such high outward commuting. The social benefits of this would be numerous:

- Decreased traffic congestion (and perhaps better air quality as a result);
- Lower commuting times leading to less unproductive time and sedentary lifestyles;
- Wider long-term health benefits of sustainable commuting by foot/bike;
- Inward investment in the borough’s services and infrastructure;
- Inward spending on local services, shops, goods and produce.

5.13 The jobs created would be at all levels and in many different disciplines including, management, marketing, maintenance and gardening, office administration, IT support, security, technology, vehicle mechanics, catering, customer care and cleaners.

5.14 The overall positive economic benefits of inward investment also include the purchase of goods from local suppliers, use of local facilities by residents and workers (i.e. local restaurants, shops and petrol stations) and on-going maintenance/service contracts.
6. GREEN BELT ASSESSMENT

6.1 The proposed allocation seeks release of land from the green belt. The NPPF recognises the importance of the green belt. A fundamental purpose of green belt policy is to prevent urban sprawl and keep land permanently open. In all, the green belt serves five purposes which are set out in paragraph 134 of the NPPF.

6.2 These five individual purposes should be considered and assessed, each on their own merits and compared against a competent scoring matrix (as is commonly used and described below), to establish the overall contribution a site makes to green belt purposes. This scoring matrix provides an empirical basis upon which to determine the amount of harm, or otherwise, that would result from its release.

Scoring matrix

6.3 The following scoring matrix is adopted for the purposes of this assessment. Where an overall score is Strong (red) that is an indicator that releasing the green belt designation could cause significant harm to the five purposes. Where an overall score is Weak (green), this is an indicator that releasing the green belt designation would not result in significant harm and its removal from the green belt is likely appropriate.

Fig.3 - Methodology for green belt scoring:

6.4 Where a site reasonably performs a role within all of the five green belt purposes, the maximum score available would be 25. Conversely, where it performs weakly, the minimum score would usually be 5. However, in instances where a site makes no contribution at all to one or more of the defined purposes, a “0” score can be given.

6.5 Additionally, it should be noted that where policy objectives can be achieved through other policies, such as those protecting public open space, a green belt designation is usually inappropriate and the designation should be removed.
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<th>Commentary</th>
<th>Strength of Contribution</th>
<th>Score (Out of 5)</th>
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<td>To check the unrestricted sprawl of large built-up areas</td>
<td>The proposed allocation is well defined on the eastern boundary of the A49 dual carriageway; the M6 motorway on/off spur to the south and the M6 motorway to the west. However, it has a very weak boundary at the north which is not well defined and does little to prevent creeping of the industrial and residential areas. The release of the land is unlikely to result in further sprawl beyond 2037.</td>
<td>Weak</td>
<td>2</td>
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<td>To prevent neighbouring towns merging into one another</td>
<td>To the north of the allocation lies Winstanley and Marus Bridge and to the south is Landgate and Bryn. There is potential that the settlements, which are now separate begin to merge as a result of the releasing the allocation. However, this is partially mitigated by vacant land surrounding the A49 Bryn roundabout situated to the south and east.</td>
<td>Moderate - Strong</td>
<td>4</td>
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<td>To assist safeguarding the countryside from encroachment</td>
<td>The site is in agricultural use and is characterised by open fields which are free of built development. However, as noted above, the northern boundary of the existing green belt designation is easily penetrated and is adjacent to the settlement.</td>
<td>Moderate</td>
<td>3</td>
</tr>
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<td>To preserve the setting and special character of historic towns</td>
<td>There are no historic towns which the site contextualises or preserves the setting of. Releasing the land from the green belt would not affect the special character of any nearby towns. It does not perform any role in meeting this purpose.</td>
<td>None</td>
<td>0</td>
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<td>To assist in urban regeneration by encouraging the recycling of derelict and other urban land</td>
<td>The land could notionally assist with this purpose, by retaining it in the green belt as development is theoretically first directed to derelict and urban land. However, the Council has demonstrated there is no alternative brownfield land available to meet this need and therefore the designation contributes only a limited value to this purpose.</td>
<td>Weak</td>
<td>2</td>
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**OVERALL SCORE**

**MODERATE**

11 / 25
Scoring analysis

6.6 The assessment shows that Allocation 48 scores 11 out of a possible 25 points and therefore only makes a *Moderate* contribution to the five green belt purposes when scored methodically using the above matrix. Specifically, it makes no contribution in one area and a weak contribution in two of the five areas and makes only a weak contribution in a further two. The moderate contribution made to the ‘encroachment’ purpose is slightly undermined by being adjacent to the settlement and the presence of farms within the parcel. The moderate-strong contribution made to preventing towns merging needs to be weighed against any countervailing benefits.

6.7 It is noteworthy that the current green belt designation has a very weak delineation at the northernmost boundary. Whereas, the proposed allocation has the motorway spur to the south and the M6 motorway to the west, which in combination provide well defined, durable and resilient boundaries to the proposed allocation.

Fig.4 – Proposed allocation relative to boundaries:
Green belt conclusions

6.8 As part of the GMSF2 consultation, the Council has undertaken a view of its green belt and accepts that it has exhausted other brownfield sites. It has been unable to identify alternative preferable sites with sufficient capacity and appropriate location for the character, nature and scale of development required. As such it is considered that tests set out in NPPF paragraphs 136 to 137 have been satisfied.

6.9 Paragraph 139 criterion a) notes the requirement to “ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development”. This is particularly relevant given the Council’s own findings that the current employment land supply is in doubt and the borough is not competing effectively in the M6 corridor when it comes to logistics and distribution sector demand. This proposed allocation performs a critical role in correcting that policy defect.

6.10 Paragraph 139 criterion b) notes that development plans should not include land within the greenbelt where it is not necessary to keep it permanently open. Criterion f) states the need to define green belt boundaries clearly using physical features that are readily recognisable and are likely to be permanent. The above green belt assessment demonstrates that the land within proposed Allocation 48 performs only moderately against the five purposes identified in paragraph 134 and whereas the Allocation 48 boundaries meet the Paragraph 139 f) criterion more clearly. As such, whilst there a degree of harm which would result from the release of the green belt designation, there is also a tangible benefit in the long term by significantly increasing boundary resilience on both the southern and western aspects.

6.11 In light of these physical and location characteristics, releasing the land from the greenbelt and allocating it for development would not result in a disproportionate harm to the green belt when balanced against the significant weight to be given to the social and economic benefits that would result.

6.12 In conclusion, we submit that given the clear requirement to review green belt boundaries and the evidence the employment land requirement cannot be met without doing so, it is appropriate in principle, reasonable and justified to release this site from the greenbelt and proceed with the proposed Allocation 48.

6.13 Moreover, this submission, taken together with the current DB Symmetry planning application show that the site is suitable, deliverable and available for this purpose.
7. LAND BELONGING TO DERBYSHIRE HOUSE FARM

7.1 Having established the justification and locational suitability, the following section will consider and provide comment on the capacity, potential layout, access, flood risk and highways in relation to the land belonging to Derbyshire House Farm (DHF).

7.2 Our client’s land comprises 6ha of grassland land belonging to Derbyshire House Farm, with broad plots as shown in Figure 5. below. The land forms the northernmost portion of Allocation 48, the remainder of which is formed by land belonging to Cranberry Ley Farm. It is characterised by two parcels of land on an immediate road frontage facing Warrington Road, with a remaining 3.2ha parcel situated to the rear. See also Appendix A.

Fig.5 – Indicative site/plot area plan:
Site development capacity

7.3 The proposed allocation is for B2 and B8 industrial uses and there is a compelling justification for releasing the land for this purpose as explained above. This part of the supporting statement will demonstrate that development such as envisaged by the allocation is suitable, available and deliverable, in addition to other complimentary uses.

7.4 The quantum of development which can be accommodated on the wider allocation is to some degree already established by the current DB Symmetry planning application (ref A/18/85947/MAJES) which proposes 133,780 sq.m of gross floor area. Nonetheless, some further master planning work has been done to establish the indicative capacity of the remaining land within the allocation which belongs to Derbyshire House Farm.

7.5 We note that the DB Symmetry application proposes to meet demand for buildings which are in excess of 9,200 sq.m (each requiring a land take of circa 2.5ha). Given the potential for utilities constraints to restrict the position and size of buildings on the land belonging to DHF, it is necessary to consider a layout of primarily B8 Use medium sized units of circa. 5,000 sq. m each, resulting in a gradual transition from the Wheatlea estate to the larger DBS site. In such instance, one could expect a land take of <1.5ha per unit.

7.6 It is also appropriate to consider what other complimentary employment generating uses could be appropriate on the site to assist with meeting the borough’s employment needs generally. It is expected that other employment generating uses such as a discount food store, a club warehouse, petrol filling station, a drive-through coffee shop would be complimentary to the proposed B2 and B8 uses. They would provide valuable stimulus to the local economy by securing and diversifying employment opportunities.

7.7 In light of the above, two scenarios and potential site layouts have been devised:

Option 1 – Development of land for up to 24,000sq. m (256,200sq. ft) Gross Internal Floor Area of employment uses comprising Use Classes B8 (21,000sq. m); Flexible use for Trade Counter or B1 (c) Research (1,500sq.m); A1/A3 Drive through coffee shop (373sq. m) and a Petrol Filling Station (373sq. m).

Option 2 - Development of land for 14,300sq. m (153,900sq. ft) Gross Internal Floor Area of employment uses comprising Use Classes B8 (8,640sq. m); B2 (2,787sq. m); A1 discount food retail store (1,784sq. m); A1/A3 Drive through coffee shop (372sq. m); 2no. drive through units A1 (344sq.m) and a Petrol Filling Station (372sq. m).
Fig. 6 – **Option 1** indicative site layout (see scale plan ref. 19/1008 SK (00)) ©MBED Architects 2019.

Summary: Employment development of up to 24,000 sq. m (256,200 sq. ft) Gross Internal Floor Area comprising B8 (21,000 sq. m); Flexible use for Trade Counter or B1 (c) Research (1,500 sq. m); A1/A3 Drive through coffee shop (373 sq. m) and a Petrol Filling Station (373 sq. m).
Summary: Employment development of up to 14,300sq. m (153,900sq. ft) GIA comprising B8 (8,640sq. m); B2 (2,787sq. m); A1 discount food retail store (1,784sq. m); A1/A3 Drive through coffee shop (372sq. m); 2no. drive through units A1 (344sq.m) and a Petrol Filling Station (372sq. m).
8. ANALYSIS (TECHNICAL MATTERS)

8.1 Having established that the principle of development is acceptable and outlined the significant economic, social and environmental benefits in favour of the proposed allocation, the following section considers and analyses the findings of a range of technical matters such as highways, ecology, land quality and emissions to air, water and land, travel planning, noise, and drainage.

Access and highways considerations

8.2 Access to DHF is to be provided via a new left-in/left-out junction off the A49 Warrington Road on the eastern boundary, together with the re-siting the existing bus stop. The vehicular track to Cranberry Ley Farm will pedestrianised and the PROW retained. Within the site, the road layout will be dictated primarily by the range of constraints such as the requirement to leave room for utilities easements and HGV turning areas.

See proposed access drawing SCP SK001

8.3 The NPPF is the most up to date policy in respect of highways and sustainability considerations. Paragraphs 102 to 109 promote and set out policies in pursuance of safe and sustainable transport. In particular, paragraph 108 states that proposed allocations should only be adopted where they meet the criteria set out at points a) to c), which are to be sustainable; have safe/suitable access; and avoid or mitigate significant impacts on the transport network to the extent which is reasonable and cost effective when compared to the nature and scale of the proposals. This is reinforced by paragraphs 109 and 110:

a) Paragraph 109 notes that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

b) Paragraph 110 criterion a) and c) state the priority for sustainable modes of transport, providing access to and encouraging the use of public transport and creating places which are safe and avoid conflict between users.

8.4 A detailed Highways/Transport Statement has been provided which demonstrates that the relevant NPPF criteria are satisfied. In particular, as part of the allocation, sustainable methods of transport will be integrated to the proposals and the quantum of development on the DHF land can be safely accessed via the left-in/left-out junction.

See SCP Transport report ref. 19023, March 2019
Noise

8.5 At a national level the NPPF paragraph 180 considers potential for unacceptable adverse impacts on amenity resulting from noise. The phraseology in the NPPF adopts the standard of avoiding “significant adverse impacts” and cross refers to the Noise Policy Statement for England (NPSE).

8.6 The NPSE exists to help decision makers determine whether the noise generated by a development should preclude the grant of planning permission. The key phrases in relation to noise concentrate on the ‘significance’ of any ‘potential adverse effects’ resulting from noise. As a standing principle, it should be noted that any adverse effects of noise from a development must be considered and weighed against the benefits.

8.7 This is reinforced by the National Planning Practice Guidance paragraph ID 21a-001-20140306 which confirms that conditions should be used to allow development to proceed by mitigating the adverse effects of the development, where it would otherwise have been necessary to refuse planning permission: “It is important to ensure that conditions are tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary controls.”

8.8 The nearest Noise Sensitive Receptor (NSR) locations are the farm houses upon which the industrial allocation is proposed. Beyond those, the NSR locations are the residential properties off Tan House Drive which are over 125m away from the proposed allocation.

8.9 The most effective method for reducing noise is to provide an interface distance between development sites and the NSR locations. However, in the event a proposal is likely to have any adverse impacts, this can be mitigated through construction methods; noise management plans; erection of noise barriers and/or imposition of planning conditions where their application would be consistent with national planning policies.

8.10 In due course, a bespoke assessment can be provided for each plot of the allocation which will be supported by empirical data reporting and evaluation methodologies. At the present time there is no indication that the amount of noise that would be generated by employment allocation would result in significant adverse impacts which could not otherwise be prevented, minimised and/or mitigated.

8.11 In conclusion, the separation distances to the NSR locations are not indicative of a potential noise problem and as such, the site is considered deliverable in this context.
Geo-environmental and geo-technical considerations

8.12 At a national level, paragraph 170 of the NPPF states that planning policies and decisions should: “e) prevent[ing] new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.” Local Plan policies do not introduce any new considerations.

8.13 The site is identified on the Council’s constraints maps as Potentially Contaminated Land (PCL) owing to its proximity and historical connection with historical coal workings and mines. NPPF paragraphs 178 to 183 reiterate the need for planning policies to take into account local ground conditions, instability and potential for land or ground water contamination. It requires, amongst other things, investigation and reporting to be completed by competent persons.

8.14 In this case, the promotion of the land at DHF is supported by a detailed Phase 1 geo-technical and environmental report (Campbell Reith, March 2019) which indicates the known risks and sensitivities associated with developing the land.

8.15 From the information available and subject to further investigations, including undertaking Phase 2 reporting and a Coal Mining Risk Assessment, it is considered at Phase 1, there are reasonable indications that the site is developable and that compliance with NPPF paragraphs 179 to 180 can be achieved.

Drainage

8.16 The application site is located within Flood Zone 1 (very low probability) as defined by the Environment Agency Flood Map for Planning (2019). This means it has a less than 0.1% (1 in 1000) annual probability of pluvial or fluvial flooding. It is not therefore at risk of flooding from rivers or the sea and the site does not need to be sequential or exceptions tested. Neither is the site known or expected to be within a critical drainage area.

8.17 The preferred drainage approach is to incorporate Sustainable Urban Drainage Systems into the proposed development plans, utilising attenuation ponds, soakaways and infiltration ditches/swales. Subject to percolation testing and geo-technical/geo-environmental constraints, it is expected that this can be accommodated on the site.
Minerals safeguarding

8.18 The site is within a mineral safeguarding area for Carboniferous, Pennine Coal Measures coincident with shallow coal and unproductive Coal Measures. The safeguarded area is substantial, measuring over 7,530 hectares in all.

8.19 As noted above, from the geo-technical research and reporting already undertaken, it appears that the land within the allocation has been worked for coal in the past, both above and below ground. Whilst a Coal Mining Risk Assessment must be produced to support any forthcoming planning application(s), it is assumed with relatively certainty that the site has been worked to the limit of its productive viable capacity.

8.20 Moreover, the extent of the safeguarding area is so substantial and the site’s proximity to residential areas now is indicative that proceeding with the proposed industrial development would not be incompatible with the safeguarding in any case. We also understand that in the mid-late part of the 20th century, the coal authority held certain statutory acquisition rights over the land which have since been withdrawn which is a further indication of its lack of need for the land to be safeguarded for this purpose.

Air quality

8.21 Nationally there is an aim to reduce nitrogen oxides, particulates and sulphur dioxide emitted by vehicles. The site itself is not within an Air Quality Management Area (AQMA), however, the entrance road and arterial road network surrounding it to the east and south are, and these may be affected traffic fumes. As such the planning applications for the proposed developments will need to be supported by an Air Quality Assessment.

8.22 Additionally, any new point sources of air pollution would require individual assessment based on the activities of end users. However, where these would fall under the control of the Environmental Permitting Regulations, Para 183 is clear that the assessment should not be duplicated: “The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”

8.23 In conclusion, this matter requires further consideration and investigation, although it is anticipated that the allocation could operate within the constraints of the adjacent AQMAs and any harm which is identified is to be weighed in the planning balance.
Ecology and biodiversity

8.24 NPPF Chapter 15 deals with conserving and enhancing the natural environment including habitats and biodiversity. Broadly it promotes conservation and where possible, enhancement of the natural environment. The primary ethos is that development should not be pursued at unreasonable costs to the environment, but it should be weighed in the planning balance against economic and social dimensions. Where adverse impacts are likely to occur, they should be avoided and mitigated.

8.25 In this case, the proposed development area is on land which was previously open cast and shallow mine workings before being used more latterly for arable, pasture and grassland farming, cropped once or twice annually. It is not a statutory, regional or locally designated wildlife habitat site or home to any priority or protected species. It is thus anticipated that any long term ecological and biodiversity value, perhaps other than at field margins, is likely to be low.

8.26 However, it is notionally identified on the Council's, Natural England and the RSPB's regional mapping system as a being habitat area for farm and woodland priority bird species of Grey Partridge, Lapwing, Tree Sparrow and Curlew; although this is not evidence however of their presence on the land. As such, where proven necessary and appropriate, new or enhanced habitats can be incorporated into the vacant land on the wider allocation to provide enhancement benefit to ecological green networks.

8.27 In due course, a full ecological survey and an arboricultural impact assessment can be conducted to demonstrate that there will be no adverse impacts such as loss of or deterioration of habitats resulting from the proposals. Or, where losses or impacts are likely to occur, how they will be prevented and mitigated as far as possible.

8.28 It is noted that Himalayan Balsam and Japanese Knotweed, which are both non-native invasive plant species, have been identified within the allocation. Their precise location and a management plan for their eradication removal should be provided as part of any forthcoming planning application submissions.

8.29 In conclusion, the site is not known or expected to be constrained by any formal designations, protected species or irreplaceable/rare habitats. However, any forthcoming planning applications will need to be accompanied by appropriate reports which identify measures to prevent and mitigate harm and to enhance existing biodiversity/ecology networks to the extent it is reasonable and necessary.
9. CONCLUSIONS

9.1 Wigan has one of the highest commuter outflows in the Greater Manchester region, with 28% of the workforce commuting to jobs outside the borough. There is a proven need for new jobs and economic development in the borough, yet the Council is unable to meet its employment land requirements. Some 40% of the employment land pipeline supply is in doubt and there are relatively high numbers of vacant units. Additionally, employment land is being re-purposed for housing and non-industrial uses. There is also a general under-supply of large format warehousing in locations with good motorway access.

9.2 The proposed Allocation 48 at Junction 25 would provide up to 158,000 sq. m (Gross Internal Area) of essential employment floor space to meet the borough's currently unmet employment land requirements. It occupies a unique position being the only suitable and available location within the M6 corridor. The development would stimulate the local economy, enable the borough to compete on a sub-regional basis by providing up to 1,864 new jobs; £85.5 million in construction investment; and £3.39 million annual rates payable to the Council. The economic benefits of the Allocation are substantial.

9.3 Although the land is currently within the green belt, it performs only moderately (i.e. it does not make a strong contribution) when compared against the five green belt purposes defined in national policy. Any harm which would result from releasing the green belt designation to enable the allocation is proportionate and justified, the Council having exhausted its search for alternative brownfield sites. As such the situation is an exceptional circumstance sufficient to trigger removal of land from the green belt.

9.4 There is a notable opportunity to diversify the employment uses at the site by providing a range of complimentary developments such as a petrol filling station, discount food store and warehouse clubs which generate secure employment in their own right.

9.5 The two main landowners both support the proposed allocation and have submitted a planning application for its development (providing evidence of very special circumstances) or have provided a range of technical reports and written submissions to help demonstrate that the proposed allocation is achievable and deliverable within the plan period. There is active interest from national and regional developers and clear expectations of quick construction and a fast uptake of occupation by national and regional logistics and warehouse operators / occupiers.

9.6 In conclusion, Allocation 48 should be supported, progressed and adopted by the GMSF.
I trust this statement assists you in setting out our support for the allocation and informing your deliberations. If you have any queries or concerns, please do not hesitate to contact me.

Signed:

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For and on behalf of County Planning Ltd

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### SUPPORTING DOCUMENTS (MARCH 2019)

The list of submitted plans and documents is as follows:

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