

# Rubicon Planning

**STROUD DISTRICT LOCAL PLAN REVIEW 2020 - 2040**

**PRE-SUBMISSION DRAFT PLAN (REGULATION 19) MAY  
2021**

**Comments on behalf of;**

**Tritax Symmetry (Gloucester) Limited in respect of  
Employment Allocation PS43, Javelin Park**

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# 1 Introduction

- 1.1 These comments are submitted on behalf of Tritax Symmetry (Gloucester) Limited, in respect of land West of Gloucester Road, Hardwicke close to M5 J12 where it has an option agreement.
- 1.2 The land has been allocated in the Local Plan Review as a 27ha extension to the existing Key Employment Site of Javelin Park for B class uses, “Employment Allocation Policy PS43, Javelin Park”. Core Policy CP2, Strategic growth and development locations, identifies the site as a strategic development site.
- 1.3 Stroud Environment Committee agreed to recommend to Full Council that the pre-Submission Plan was approved for submission to the Secretary of State (SoS). No objections to the employment elements of the Local Plan Review were raised by either Environment Committee or Full Council and the Local Plan Review was published for consultation in June 2021. The pre-Submission Plan will be submitted to the SoS for Examination on the basis the Council consider the policies within it are sound. The plan will be examined on whether it contains policies which make it unsound, providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs.
- 1.4 The Local Plan Review acknowledges that the Hardwicke area has an important employment role: with three key employment sites nearby, and the Hardwicke Employment Hub is one of the District’s employment hubs.
- 1.5 Expected labour supply and labour demand job forecasts for the District suggest the need to plan for between 7,740 and 10,440 net new jobs (2020-2040) and the District will accommodate at least 72ha of additional employment land to meet the needs of the District over this period. Ultimately, the Local Plan Review allocates 79ha.
- 1.6 PS43 will make a very important contribution to meeting the need for employment generating land. 1.7 These comments support the allocation of land West of Gloucester Road as an employment site.

# 2 Need for Employment Land

- 2.1 The NPPF states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area. Planning policies should identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; as well as being flexible enough to accommodate needs not anticipated in the plan.
- 2.2 The Local Plan Review (para 2.6.1) says;

*“The Council has a commitment to work closely with the business community to grow the local economy and increase employment.”*

## Locally Objectively Assessed Need for Employment Land

- 2.3 It must not be forgotten that national guidance on meeting development needs applies equally to employment need as it does to housing need. Core Policy CP2 states,

*“The Local Plan will meet the objectively assessed needs of the District by providing for the development of housing, employment, retail and other necessary development for the period 2020 – 2040.*

*The strategy for delivering the required [need?] is to concentrate most development at a series of strategic locations, where housing, jobs and necessary infrastructure can be coordinated and delivered in a timely manner.*

*The strategic sites are located at the principal settlements within the District, at new settlements and within the key employment property market areas: south of Gloucester, Rail/M5/A38 Corridor, Stroud Valleys and Berkeley/Sharpness.”*

2.4 The Objectively Assessed Need for Employment Land is established by the Gloucestershire Economic Needs Assessment (2020) (GENA). The Assessment recommended that the Council should consider meeting two of the highest scenarios based on expected labour supply and labour demand growth scenarios. This results in the Plan supporting a net increase in “old” B – Class uses (B1, B2 and B8) of between 62 and 72 hectares. It is said the assessment accounted for the effect of Brexit and Covid 19 (even though it was completed only 6 months into the Covid crisis). **Wider Gloucestershire Need for Employment Land.**

2.5 The Local Plan Review and evidence base is clear that the employment land identified in the plan is to meet only the needs of Stroud District. Unlike housing land no provision is made to address the unmet need of Gloucester City, the JCS area or other districts.

2.6 The GENA states at paragraph 0.10 that the six Gloucestershire Authorities can be considered to form a single Functional Economic Market Area.

2.7 Paragraph 1.10 of the Local Plan Review states;

*“Local planning authorities are expected to work collaboratively with other bodies to ensure that strategic priorities are properly co-ordinated across administrative boundaries. Joint working is expected between neighbouring authorities to enable local planning authorities to meet development requirements which cannot wholly be met within their own areas.”*

2.8 Paragraph 2.61 confirms that in addition to meeting Stroud’s housing needs, the Local Plan addresses unmet needs from neighbouring Gloucester by allocating a site of 73ha for 3,000 dwellings at Whaddon for delivery by 2040.

2.9 Policy SP1 of the adopted JCS says that during the JCS plan period (2011-2031) provision will be made for 192 hectares of B class employment land which will be brought forward to support 39,500 jobs. Policy SP2 says that at least 84 hectares of this total will be on strategic sites. To date none of this employment land has come forward to create any of the 39,500 jobs anticipated.

2.10 Having progressed the three district plans to at least Examination stage the position on delivery of employment land is as set out below,

	JCS	Actual
Strategic Allocations	84ha	47ha
Existing undeveloped capacity		
□ previous allocations	39.9ha	10.4ha
□ extant planning permissions	32.3ha	10.2ha
Allocations coming forward	36ha	
□ Cheltenham Borough Council		4.4ha
□ Tewkesbury Borough Council		46.5ha
□ Gloucester Borough Council		8.6ha
Total	192ha	127.1ha
Shortfall		64.86ha

2.11 Paragraph 3.2.3 of the Adopted JCs states,

*“The JCS authorities have also specifically agreed with Stroud District Council to take a strategic approach in the review of their development plans, and to develop strategies which seek to meet objectively assessed development and infrastructure requirements in the review of their respective development plan documents. The JCS authorities will*

*also continue to work with the South Worcestershire authorities, and Wychavon District Council in particular, in relation to future development needs.”*

2.12 Paragraph 3.2.7 goes on,

*“there is joint working with Wychavon District Council to look to bring forward the cross-boundary site at Mitton, adjacent to the town. The adopted South Worcestershire Development Plan (2006-2030) already includes a policy commitment to consider, including through a review of the plan, meeting the needs of other authorities within the SWDP area. The site at Mitton is specifically referenced in this context. In addition, there is joint working with Wychavon District Council to assess the potential and possible release of land at Mitton.”*

2.13 The JCS Authorities are preparing to update the JCS and will need to not only address the c60ha shortfall in provision from the current plan, which is to meet the needs based partly on housing growth from that plan not yet provided, but also additional employment for future planned growth.

2.14 On the basis that the existing JCS could not meet all of its development land needs it must be the case that the JCS Review will also look beyond its boundaries to meet further needs.

2.15 Gloucester and Stroud are part of the same Functional Economic Market Area (FEMA) and Gloucester City urban area extends into Stroud District. As such it is possible, indeed likely, that new jobs created by allocating land for employment to meet the needs of Stroud are taken by residents of Gloucester if there is unmet need arising from Gloucester.

2.16 The JCS review is behind that of Stroud District with a Regulation 18 Plan expected at the end of 2021 with the possibility of a Regulation 19 Plan prior to the examination of the Stroud Local Plan Review.

### **Changes in Employment Market**

2.17 The OAN for employment land was published in August 2020 and used employment base data from 2017. While the GENA took account of Brexit and Covid 19 at the time, the UK voted to leave the EU in 2016 and officially left the trading bloc on 31 January 2020 with a new trade deal agreed on 24 December 2020. The effects of the Covid 19 pandemic began to be felt on the economy in Spring 2020 and will continue for many months if not years. In August 2020, 5 months into the pandemic the length and impact on attempting to contain the virus could not have been anticipated nor indeed its effect on industry. These effects have varied widely across sectors and the warehousing and distribution sector has been particularly effected due to a greater reliance on on-line shopping and disruption to free flow of goods due to Covid and Brexit.

2.18 The take up of B8 space during 2020 through to the first half of 2021 (time of writing) has represented around 7 years of the predicted take up pre-pandemic. The switch of consumers to on-line shopping has significantly been accelerated so that we are now reaching levels previously predicted to be attained in 7 years' time. The pandemic and Brexit has also increased the importance of warehousing capacity for PPE type goods as well as general household goods. These trends are likely to be maintained post Covid 19 albeit at a slower rate of increase but from a higher starting point as more people have become used to on line shopping, retailers have adjusted their point of sale process and due to improved ordering and distribution systems.

2.19 Core Policy CP11, New employment development, states that permission will be granted for industrial or business development, recognising the specific locational requirements of different sectors, provided that the proposals would, inter alia, demonstrate how the principles of industrial symbiosis have been taken into account.

2.20 The local plan evidence base and public consultation highlighted 40 key issues, challenges and needs facing the District, which the Local Plan should seek to address. The issues include ensuring that the local economy can respond positively to challenges and any new trading opportunities following Brexit. The Key Economic Issues need to include building back the economy following the Covid crisis and this will include making further provision for employment land.

2.21 Strategic Objective SO2; Local economy and jobs, provides for a strong, diverse, vibrant local economy that supports existing businesses and encourages new enterprise – enabling balanced economic growth, coupled with enhancing skills and job opportunities across the District.

2.22 Section 2.6, Local economy and jobs, states;

*“The development strategy needs to ensure that sufficient employment land is provided to meet the future needs of business and balance the planned housing growth.”*

2.23 The Employment Land Review identified occupancy rates well above 90% for industrial space suggesting an existing undersupply of premises against demand. Key markets identified included a focus of industrial and warehousing development at Quedgeley, Hardwicke and M5 Junction 12.

### **Conclusion**

2.24 The supply of employment land in Stroud to meet the District’s job growth target is likely to come under severe pressure as a result of under provision in surrounding areas and exceptional growth in certain sectors of the economy.

2.25 PS43 is critical to meeting a significant portion of the supply of land to meet the Districts’ need.

## **3 Junction 12 M5 Motorway Context**

3.1 The M5 Motorway passes through the district between the AONB and Severn Estuary. Junction 11a lies to the north of the district boundary and J14 to the south. The role the M5 plays in the economic and social life of the district needs to be reflected more positively in Section 1.1, District Context. Indeed, the M5 Corridor and its junctions form a distinct character area separate from the “parish clusters”. While the parish clusters have their own unique qualities, they also share common features which are distinct from the M5 Corridor and its junctions.

3.2 Para 1.1.12 recognises there is significant growth occurring along the M5 corridor (focused on Gloucester, Cheltenham and Bristol) – which impacts on Stroud District now and in the future. One of the priority issues identified, having taken into consideration local views, national policy and evidence where available, is ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by concentrating employment growth within the A38/M5 corridor.

3.3 The development strategy includes further strategic employment growth being concentrated at accessible locations within the Cross Country Rail/A38/M5 corridor. Paragraph 2.3.18 states the strategy envisages *“a focus on employment growth at Quedgeley East / Javelin Park;”*

3.4 Strategic Objectives include, SO2, Local economy and jobs, states that the development of employment sites in the M5/A38 corridor will mean that development can be located close to strategic road and rail networks and in places that business wants to be. Development will create the opportunity to provide a range of units from large warehousing and distribution units down to offices and smaller industrial units, possibly as start-up businesses. Planning for employment together with housing also provides the opportunity for residents to work locally and to reduce out-commuting levels.

3.5 Paragraph 2.6.5 of the Local Plan Review confirms one of the six key segments of market demand that has been identified is for future employment land supply to satisfy large industrial/warehousing units at key locations within the A38/M5 corridor, serving the wider Gloucestershire/regional market. The Local Plan Review goes on to state (para 2.6.8) that the plan seeks to provide for new employment land and support existing employment areas located at the key employment property market areas identified in the ELR: south of Gloucester; within the M5/A38 corridor. Also acknowledging (para 2.6.10) there are particular opportunities associated with developing new modern business park premises at Javelin Park.

3.6 The employment strategy includes therefore, to deliver economic growth and additional jobs on and adjacent to existing high value employment sites and within the M5/A38/rail growth corridor through new

employment sites of varying sizes and locations to meet the specific locational requirements of different sectors.

3.7 Core Policy CP2, Strategic growth and development locations, states that,

*“Stroud District will accommodate at least 12,600 additional dwellings and at least 72 hectares of additional employment land to meet the needs of the District for the period 2020-2040.”*

3.8 Strategic development sites to meet these needs are allocated including at Javelin Park (27ha).

3.9 Junction 12 is recognised as being part of Gloucester’s urban fringe and a key location for employment development. The Local Plan Review needs to acknowledge that Gloucester City is an important settlement for sustainable growth of the district.

3.10 Core Policy CP4 is concerned with place making and the spatial vision for Stroud. It is felt this Vision is overly concerned with residential place making and does not account for development characteristics of employment uses. As such it does not provide an appropriate place making vision for employment sites. As set out above the Vision needs to specifically refer to the economic development of the district, this would then tie into Policy CP4 tailored to specifically refer to Employment development.

3.11 While we do not disagree with the principles of CP4, they do not fit with employment development and do not seem to be written with employment uses in mind. As an example, proposals are expected to integrate into the neighbourhood, support community services and meet employment requirements in terms of mix, tenure and type.

3.12 Core Policy CP5 needs to be clear that in addressing development principles for strategic sites the policy as a whole addresses residential and non-residential sites. The first five bullet points include requiring the provision of community facilities, this is not normally expected on employment sites. The second paragraph refers to applications for strategic sites – both residential and non-residential. The numbered bullet points need to be relevant to employment sites, the following changes are suggested to make the policy inclusive, 3.13 Strategic sites will:

- Be low impact in terms of the environment and the use of resources
- Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars
- Have a layout, access, parking, landscaping, and community other facilities in accordance with an approved indicative masterplan
- Be located to achieve a sustainable form of development and/or support regeneration. Development proposals should incorporate a negotiated masterplan design code/framework.

3.14 The Delivery Document and planning application for the site demonstrates how this policy can be delivered at PS43.

3.15 Chapter Three of the Local Plan Review addresses the spatial vision for the eight parish clusters. Junction 12 lies in what the Plan describes as Gloucester’s rural fringe. In respect of the adjacent Energy from Waste (EfW) facility at Javelin Park (APP/T/A13/2200210) the Secretary of State took the view that the characterisation of the area is “urban fringe” that has been advancing into the Vale landscape over a period of at least 40 years and it is planned to continue that progress. Whilst the area is partly greenfield at present its significance is its relationship to the urban area of Gloucester City and the motorway. It would be more sensible to include this area, excluding the area generally south east of the motorway and railway line within the AONB, as Gloucester’s Urban Fringe and address the rural area beyond separately as these are distinct, separate areas.



- 3.16 In respect of guiding principles (para 3.4.5) reference needs to be made to the guiding principles for employment development in the urban fringe and that J12 will continue to be a focus for large scale employment development (or that the Hardwicke employment hub includes J12) and that employment will be contained by the Cross Country Line.
- 3.17 Employment Allocation Policy PS43, Javelin Park allocates the site for 27ha of office, B2 and B8 employment uses setting conditions for strategic landscaping, sustainable transport and highway improvements, effect on adjacent uses and to be supported by a masterplan. The Planning application for the site will address these requirements.
- 3.18 Supporting text (para 5.4) to Core Policy 11 is concerned with economic growth and strategic employment needs. The Local Plan review says that,
- “ it is important to ensure that strategic housing growth is coupled with the delivery of significant employment development of the right type to help improve self-containment of communities. Policies for employment development in the Local Plan will have regard to both strategic and local business needs, and will aim to facilitate a flexible supply of land moving towards a low carbon economy. They will aim to both increase the number of jobs available locally that are currently lower than the number of available workers and provide for jobs that more readily match the broad skills of the workforce. Too few jobs and provision for a lower skill base are factors that have led to considerable movement of higher skilled workers out of the District to other places of employment. The District already has a reputation for advanced engineering, green technologies and creative skills that should be built upon. Further sites in locations that are accessible to the existing and proposed labour supply are proposed, but with a focus on urban areas in order to help reduce out-commuting from the District.”*
- “The area requires more jobs and the more intensive use of much of this land for higher density employment development, coupled where appropriate with enabling development and environmental improvements, complements the overall strategy for growth.”*
- 3.19 Core Policy CP11 sets further conditions to be met for new employment development which can be seen to be met from the planning application. In terms of industrial symbiosis, it is considered this principle goes beyond that defined in the local plan and covers all inter supportive activities needed to maintain a sustainable economy. Logistics development which will be supported at PS43 as a key part of the manufacturing process. As referred to in paragraph 5.15 of the Local Plan Review, by co-locating complimentary businesses this will reduce vehicle mileage and CO2 emissions.

## Conclusion

- 3.20 The strategy of concentrating large scale employment uses within the motorway corridor is entirely sound and J12 is a key location for employment growth.

## 4 Land West of Gloucester Road, Hardwicke PS43 Javelin Park

4.1 Tritax Symmetry (Gloucester) Limited's land west of Gloucester Road, Hardwicke close to M5 J12 is allocated in the Local Plan Review to meet the development needs of the District. Given the single FEMA jobs created could meet employment needs of Stroud or Gloucester or other adjoining areas.

4.2 The Employment Land Review (page 156) describes the site as;

*“Colethrop Farm is owner of the site (Tritax Symmetry have an option). Area of greenfield agricultural land south of Javelin Park and identified as part of a larger logistics scheme. Tritax is proposing Symmetry Park across the combined total area of Javelin Park and the [east/]west of Gloucester Road.*

*West of Gloucester Road = 104,000 sqm.*

*Seven units of 1,102-58,993 sqm.*

*No defined timetable for delivery but feel they could develop rapidly.*

*Constraints:*

- *Trees on site*
- *Tritax are presently commissioning a range of site studies to confirm any physical, environmental, etc. constraints in advance of the Local Plan Examination in Public.*

*Key Access Issue - With the consent at Quedgeley East (St Modwen Park) there is now a capacity issue at J12, M5. Further, development will trigger the requirement, from Highways England, for a major investment and upgrading of the junction. This will cost in excess of £25 million. Highways England are considering potential upgrades to both junctions 12 and 14, which could under certain circumstances include interim solutions to allow some development, provided they do not prejudice the delivery of a wider scheme. Once the Council know the overall impacts of the Local Plan growth on these junctions it will be agreeing with Highways England a way forward, which is likely to include major bids for Government funding, so the full costs will not fall on developers. As of yet there have been no discussions with developers about what they will need to contribute or how costs could be apportioned between schemes.”*

4.3 Tritax Symmetry are now treating the allocated West site as separate to the East site; when the ELR was being prepared the sites were considered together. Both sites could come forward independently and potential demand supports a strategy of a two phase approach subject to allocation and planning permission with the east site being a future second phase.

4.4 Tritax Symmetry previously produced a Delivery Document setting out the Vision for the site having considered all constraints to development to assure themselves and the local planning authority that the site is suitable and deliverable for the proposed B2/B8 use. This has been previously submitted to the local planning authority and further copies are attached to these comments.

4.5 The Delivery Document considers traffic impact and potential works to the motorway junction. As part of the preparation of the planning application for the West site, detailed discussions with Highways England have been carried out including using the HE Paramics model to assess impact on the junction and necessary short term and long term mitigation. The off-site highway works necessary to bring the site forward are understood and included in the financial model.

4.6 In terms of market segments met and evidence of deliverability for the West sit the Employment Land Review states;

*“Motorway linked larger industrial/warehouse units, serving the wider Gloucestershire/regional market.*

*Land is under the control of an experienced developer of larger B2/B8 schemes and via the B4008 enjoys good access to the wider, and growing Quedgeley/Hardwicke/Junction 12, M5 cluster which is growing and has proven it can attract occupiers from across the county and beyond.*

*The larger scheme will also generate greater a capital receipt allowing it to make a more significant contribution to the Junction 12 and 14 improvement requirements, should this be needed.*

*There is a strong and ongoing demand for mid-box units in the M5 Corridor, to meet the specific growth requirements of Gloucester companies and to bring in regional/ national investment. Logistics demand has only been strengthened by the increase in e-commerce from the Covid-19 related lockdown and there is no sign of demand slowing in the medium-long term. With St Modwen rapidly progressing development to the north, there is a need to look for further/ longer term allocations for Quedgeley/Junction 12, M5.*

*Although this land does link to St Modwen Park to the north it represents a more significant incursion into the countryside than land to the west. One option would therefore be to encourage the delivery of this land as a later phase of development, later in the Plan Period, once development to the north and west is complete and subject to evidence that demand remained strong at that time. The Council would need to gain the support of the developer to ensure the wider scheme was progressed as a multi-phase development.”*

4.7 The review concludes in respect of the West Site;

*Finally, it is noted that a sizable portion of the development land, 51.40 ha on a net basis, is proposed on greenfield land south of Junction 12, M5 at Quedgeley/Hardwicke. This would be reflective of demand patterns which show the Junction 12 area to be a focus for industrial and warehouse growth, not just for Stroud District but for Gloucester as well and also serving a wider sub-regional/ regional motorway-linked market. There has been a steady development of B2/B8 premises in the area since 2006 with no sign of demand slowing here. Indeed, a growing e-commerce market during the 2020/21 Lockdowns suggests logistics demand will increase further in the short-medium term. Larger strategic developments will also be more able to contribute financially to major highway upgrades at Junction 12.*

*However, if the scale or nature of the proposed development was judged too large an incursion into the countryside, one option would be to look at a more limited development of Symmetry Park, focused only on land west of Gloucester Road, allowing the development of an expanded Javelin Park site on land south of the Energy from Waste Plant. Land East of Gloucester Road, a more significant incursion into the countryside, would either be excluded from allocation or held as a longer-term growth option. Even with this exclusion, 35.60 ha of employment land would remain in the Quedgeley/Hardwicke area.”*

4.8 The Local Plan Review and Evidence Base documents support the principle of this location, within the motorway corridor and practically adjacent to a motorway junction, for employment use. The site is allocated to meet the identified Objectively Assessed Need for Employment Land to serve Stroud District.

## **Conclusion**

4.9 PS43 is suitable and deliverable for employment development within the plan period as demonstrated through the Delivery Document and planning application.

## **5 Summary**

5.1 Employment Allocation Policy PS43, Javelin Park makes a significant contribution to Objectively Assessed Need for Employment Land. In respect of this policy the Plan is positively prepared in seeking to meet the area’s OAN.

5.2 In the event it is found the Plan needs to address unmet need from neighbouring areas Policy PS43 remain a vital component of that overall need and would contribute to the Plan’s strategy of seeking to meet the area’s need.

5.3 The Plan is based on a Strategy of concentrating significant employment development along the motorway corridor and at J12. This is an entirely appropriate strategy given the strategic role of the motorway. This is more appropriate considering the alternatives of firstly, not meeting the area’s need for employment land or secondly meeting that need elsewhere.

5.4 Stroud is a net exporter of workers having a deficiency in jobs compared to potentially economically active residents. Failure to meet employment needs locally would be unsustainable and increase environmental harm including through CO2 emissions. Stroud District's eastern half is covered by AONB designation and the western side is dominated by the River Severn Estuary and flood plain. The motorway runs outside of and between these two areas connecting the conurbations of Birmingham and Bristol. As such, a strategy of meeting employment need concentrated on the motorway is an appropriate strategy and the Plan is justified.

5.5 Employment Allocation PS43 is deliverable over the plan period. Indeed, occupier interest is such that half of the allocation will be developed upon planning permission being granted. It will contribute to the plan being effective in meeting the strategic delivery of employment land.

5.6 Development of PS43 will take place in a highly sustainable manner; achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

1. an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
2. a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
3. an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

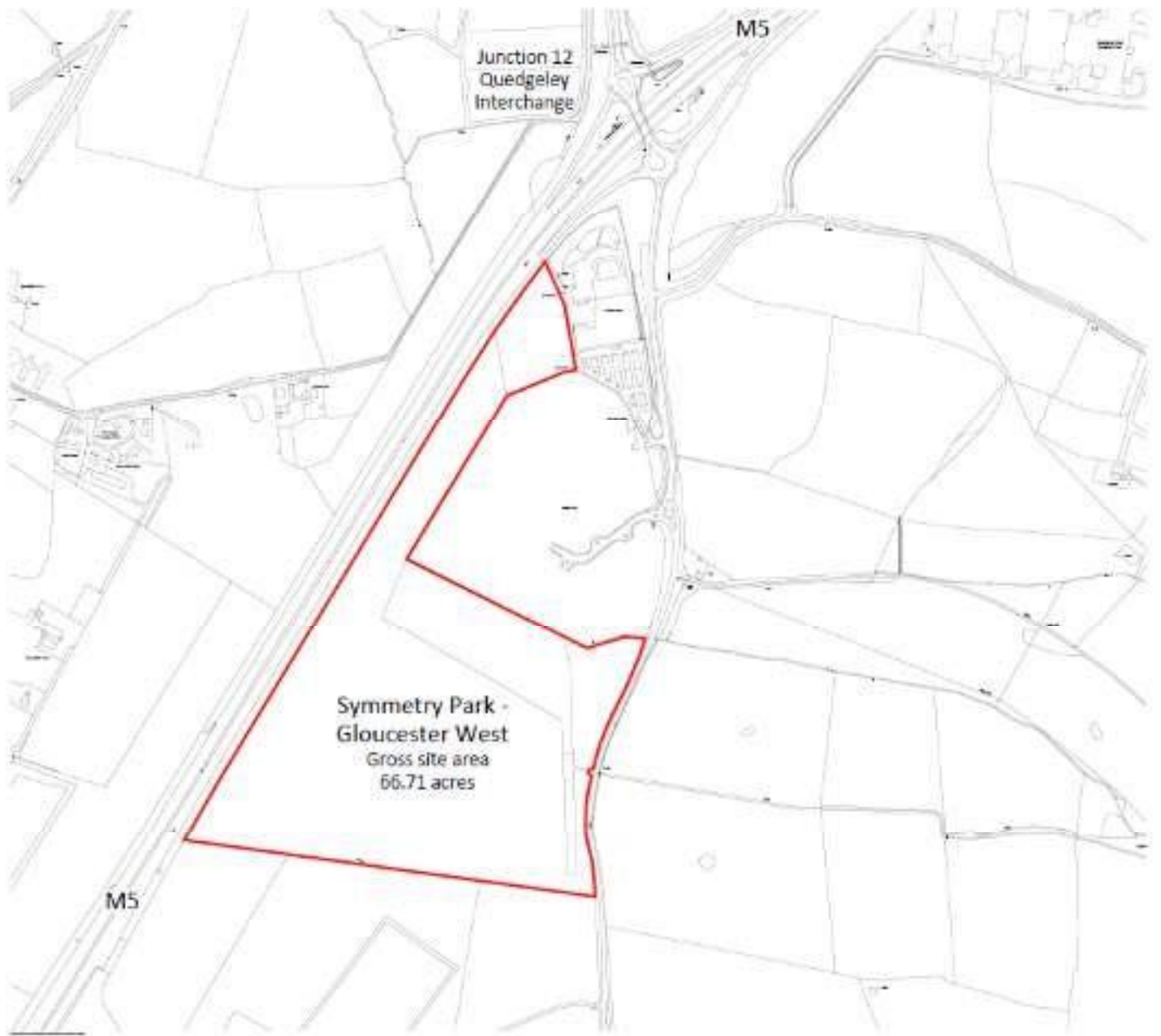
5.7 While the potential economic benefits are straightforward the SoS in determining an appeal in Warrington (APP/Y0435/W/20/3251121) for a National Distribution Centre building in November 2020, found,

- the proposal will also result in social benefits from employment generation including security, improved living standards, social cohesion, and health benefits.
- a financial contribution towards local employment secured through S106 agreement would help maximise the employment, learning and training opportunities for local communities.
- the resulting built and landscaped environment of high design quality would have a positive social impact on user of the development.
- the package of ecological and landscaping enhancements which are proposed along with measures to address climate change and minimise waste carry moderate weight in favour of the proposal.

5.8 Environmentally, the proposal can be seen to be making the best use of this strategic location and the adjacent EfW plant. Detailed proposals will protect the historic and natural environment and make the most efficient use of land adjacent to the Strategic Road Network. Detailed proposals will incorporate Local Plan Review policy of 10% net Biodiversity gain locally, be built to BREEAM Very Good as a minimum, and incorporate processes to minimise carbon. The site promoter develops sites to net zero carbon and encourages and helps occupiers achieve reduced carbon emissions in operation. These issues are addressed in the Vision Document and planning application.

5.9 Employment Allocation Policy PS43 Javelin Park is a sound policy and enables the whole plan to be considered sound.

# Appendix 1 Location Plan





(separate)

