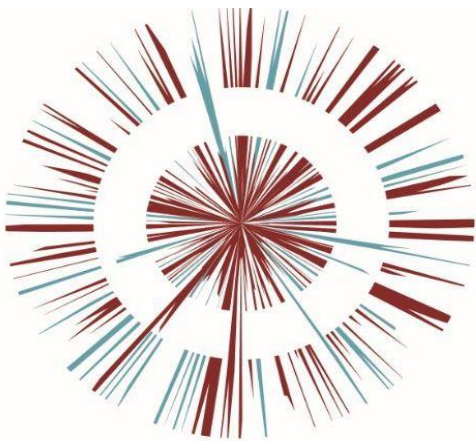




OMEGA ZONE 8, ST HELENS

Omega St Helens Ltd / T. J. Morris Limited



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15 POPULATION AND HEALTH

15.1 INTRODUCTION

- 15.1.1. This chapter reports the outcome of the assessment of likely significant effects arising from the Proposed Development upon Population and Health.
- 15.1.2. The assessment of Population and Health has established that the following additional mitigation measures are required:
- Diversions or alternative access would be provided for any temporary closures providing access to community land and assets where necessary.
 - A Construction Environmental Management Plan (CEMP) will be in place to ensure access to footpath 102 and Bold Loop walking route will be maintained during construction. This footpath and walking route will remain open throughout the construction period where practicable, with diversions put in place where required for public safety reasons and access. Should a temporary diversion or closure be required, agreement and consultation will be made with the relevant local authority.
 - Footpath and walking route diversions or closures undertaken during construction will be clearly advertised, and any diversionary routes will have appropriate signage so as not to lead to route uncertainty.
- 15.1.3. The following residual effects have been identified:
- There is likely to be a direct, permanent, long-term minor adverse effect on community land and assets (not significant);
 - There is likely to be a direct, temporary, short-term minor adverse effect on walkers and cyclists during construction (not significant);
 - There is likely to be a direct, temporary, medium-term minor beneficial residual effect on the St. Helens economy during construction (not significant);
 - There is likely to be a direct, permanent, long-term, moderate beneficial residual effect on walkers and cyclists during operation (significant); and
 - There is likely to be a direct, permanent, long-term moderate beneficial residual effect on the St. Helens economy during operation (significant).
- 15.1.4. The implementation of footpath 102 and Bold Loop access mitigation within the CEMP should be regularly monitored by the construction contractors.
- 15.1.5. Provision of pedestrian and cycle routes have been proposed as part of the development as enhancements. This is also likely to enhance the sustainable transport network within St. Helens. No additional enhancement opportunity has been identified.
- 15.1.6. The remainder of this chapter describes the assessment methodology and the baseline conditions relevant to the assessment, which have been used to reach these conclusions, as well as a summary of the likely significant effects leading to the additional mitigation measures required to avoid, prevent, reduce or, if possible, offset any likely significant adverse effects, and the likely residual effects and any required monitoring after these measures have been employed. Opportunities for enhancement, where such opportunities exist, are also discussed.

15.2 CONSULTATION, SCOPE, METHODOLOGY AND SIGNIFICANCE CRITERIA

CONSULTATION UNDERTAKEN TO DATE

15.2.1. **Table 15-1** provides a summary of the consultation activities undertaken in support of the preparation of this assessment.

Table 15-1 - Summary of consultation undertaken

Body / organisation	Individual / stat body / organisation	Meeting dates and other forms of consultation	Summary of outcome of discussions
St. Helens Council	St. Helens Council Planning Officer	Scoping opinion	<p>St. Helens Council requested to scope in Population and Health chapter due to the location of the Proposed Development within Green Belt and the significant economic benefits including job opportunities and employment.</p> <p>St. Helens Council stated the Construction Environment Management Plan must consider any disruption of footpath 102.</p> <p>The assessment should focus on walking and cycling connections to the area of St. Helens north of the M62 and look for improvement opportunities to the existing Public Rights of Way (PRoW) across the M62 and sustainable transport links to St. Helens.</p>
Mott MacDonald	Mott MacDonald appointed by St. Helens Council to review the transport elements of the scoping report	Scoping opinion	<p>The consultant suggested the referral to the Draft St. Helens Local Plan as a portion of the allocated application site is located within Green Belt, including the potential land mitigation buffer to the north east of Booths Wood and Industrial units and parking proposed to the areas north and south east of the wood.</p> <p>Comment also made on potential walkers and cyclist facility provision on the application site.</p>

SCOPE OF THE ASSESSMENT

- 15.2.2. The scope of this assessment has been established through an ongoing scoping process. Further information can be found in **Chapter 5: Approach to EIA**.
- 15.2.3. This section provides an update to the scope of the assessment and updates the evidence base for scoping out elements following further iterative assessment.

ELEMENTS SCOPED OUT OF THE ASSESSMENT

- 15.2.4. The elements shown in **Table 15-2** are not considered to give rise to likely significant effects as a result of the Proposed Development and have therefore not been considered within this assessment.

Table 15-2 - Elements scoped out of the assessment

Element scoped out	Justification
Private property and housing	It is considered that no land take from private property and housing will be required to accommodate the Proposed Development.
Development land and businesses	The application site has been safeguarded within the St. Helens Borough Local Plan 2020-2025 and Warrington Borough Council Local plan 2017-2035. It is considered that no development land and businesses will be required to accommodate the Proposed Development.
Agricultural land holdings	It is considered that no agricultural holdings will be required to accommodate the Proposed Development.
Horse-riders	It is considered that no disruption or land take from any equestrian routes will be required to accommodate the Proposed Development.
Human Health	The Proposed Development is not expected to introduce any significant direct and indirect effect on human health during construction and operation.

ELEMENTS SCOPED INTO THE ASSESSMENT

Construction Phase

- 15.2.5. The following elements are considered to have the potential to give rise to likely significant effects during construction of the Proposed Development and have therefore been considered within this assessment:
- Potential temporary direct disruption on walkers during construction;
 - Permanent direct land take from community land and assets;
 - Temporary direct employment opportunities generated during construction; and
 - Temporary indirect and induced employment opportunities generated during construction.

Operation Phase

15.2.6. The following elements are considered to have the potential to give rise to likely significant effects during operation of the Proposed Development and have therefore been considered within this assessment:

- Permanent direct land take and potential enhancement of community land and assets;
- Permanent direct enhancement on walkers and cyclist during operation;
- Permanent direct employment opportunities generated during operation; and
- Permanent indirect and induced employment opportunities generated during operation.

EXTENT OF THE STUDY AREA

15.2.7. The community land and assets, and walkers and cyclists assessment will be based on a 500m study area.

15.2.8. There are no recognised standards or methodologies for assessing the socio-economic effects (in this case effects on employment opportunities), a common approach is emerging from the experience gained from other assessments. The 'local level' study area for the socio-economic assessment comprises the administrative boundary of St. Helens. The North West comprises the 'regional level' study area for the assessment of socio-economics impacts during construction.

METHOD OF BASELINE DATA COLLATION

DESK STUDY

15.2.9. A desktop review of the available information has been undertaken to determine the baseline conditions in the study area. The following data sources have been reviewed:

- Office of National Statistics (ONS) NOMIS (Ref. 15.2);
- St. Helens Borough Local Plan 2020-2035 (Ref. 15.3);
- St. Helens Economy and Growth (Ref. 15.4);
- St. Helens Local Plan Authority Monitoring Report 2018 (Ref. 15.5);
- St. Helens Borough Local Plan 2020-2035 Submission Draft (Ref. 15.6);
- St. Helens Employment Land Needs Study (Ref. 15.7);
- St. Helens Employment Land Needs Addendum Report (Ref. 15.8);
- St. Helens Economic Viability Assessment (Ref. 15.9);
- St. Helens Infrastructure Delivery Plan (Ref. 15.10);
- National: National Planning Policy Framework (NPPF) (2019) (Ref. 15.11);
- Warrington Borough Council Local Plan 2017-2035 (Ref. 15.12);
- Warrington Economic Development Needs Assessment. (Ref. 15.13);
- Warrington Means Business report (Ref. 15.14);
- Cheshire and Warrington Strategic Economic Plan (Ref. 15.15);
- Homes and Communities Agency (HCA) Employment Densities Guidance (Ref. 15.16);
- HCA Additionality Guide (Ref. 15.17);
- Rights of Way maps (Ref. 15.18); and
- The Mersey Forest webpage (Ref. 15.19).

SURVEYS

15.2.10. No surveys have been undertaken in relation to population and health and the preparation of this chapter.

ASSESSMENT METHODOLOGY

15.2.11. Local, regional and national population and health, and socio-economic policies and legislation has been reviewed.

Walkers and Cyclist, and Community Land and Assets

15.2.12. Qualitative assessment of the effect on community land and assets, and walkers and cyclists has been undertaken based on the changes in land take and accessibility during construction and operation.

15.2.13. The sensitivity and magnitude of change criteria of community land and assets, and walkers and cyclists is provided below in **Table 15-3** and **Table 15-4** respectively.

Table 15-3 – Sensitivity value and descriptions

Receptor value (sensitivity)	Description
High	<p>Community land and assets where there is a combination of the following:</p> <ol style="list-style-type: none"> 1) complete severance between communities and their land/assets, with little/no accessibility provision; 2) alternatives are only available outside or in the wider local planning authority area; 3) the level of use is very frequent (daily to weekly); and 4) the land and assets are used by the majority ($\geq 50\%$) of the community. <p>Walkers and cyclists:</p> <ol style="list-style-type: none"> 1) national and regional trails and routes likely to be used for both commuting and recreation that record frequent (daily) use. Such routes connect communities with employment land uses and other services with a direct and convenient walkers and cyclists route. Little / no potential for substitution. 2) routes regularly used by vulnerable travellers such as the elderly, school children and people with disabilities, who could be disproportionately affected by small changes in the baseline due to potentially different needs. 3) rights of way for walkers and cyclists crossing roads at grade with $>8,000 - 16,000$ vehicles per day.
Medium	<p>Community land and assets where there is a combination of the following:</p> <ol style="list-style-type: none"> 1) there is severance between communities and their land/assets but with existing accessibility provision; 2) limited alternative facilities are available at a local level within adjacent communities; 3) the level of use is reasonably frequent (monthly); and 4) the land and assets are used by the majority ($\geq 50\%$) of the community. <p>Walkers and cyclists:</p> <ol style="list-style-type: none"> 1) public rights of way and other routes close to communities which are used for recreational purposes (e.g. dog walking), but for which alternative routes can be taken. These routes are likely to link to a wider network of routes to provide options for longer, recreational journeys, and / or

Receptor value (sensitivity)	Description
	2) rights of way for walkers and cyclists crossing roads at grade with >4000 – 8000 vehicles per day.
Low	<p>Community land and assets where there is a combination of the following:</p> <ol style="list-style-type: none"> 1) limited existing severance between community and assets, with existing full Disability Discrimination Act (DDA) compliant accessibility provision; 2) alternative facilities are available at a local level within the wider community; 3) the level of use is infrequent (monthly or less frequent); and 4) the land and assets are used by the minority (<50%) of the community. <p>Walkers and cyclists:</p> <ol style="list-style-type: none"> 1) routes which have fallen into disuse through past severance or which are scarcely used because they do not currently offer a meaningful route for either utility or recreational purposes, and/or 2) rights of way for walkers and cyclists crossing roads at grade with <4000 vehicles per day.
Negligible	<p>Community land and assets where there is a combination of the following:</p> <ol style="list-style-type: none"> 1) no or limited severance or accessibility issues; 2) alternative facilities are available within the same community; 3) the level of use is very infrequent (a few occasions yearly); and 4) the land and assets are used by the minority (<50%) of the community. <p>Walkers and cyclists:</p> <p>N/A</p>

Table 15-4 – Magnitude of impact and descriptions

Magnitude of impact	Description
Large	<p>Community land and assets:</p> <ol style="list-style-type: none"> 1) loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements. e.g. direct acquisition and demolition of buildings and direct development of land to accommodate highway assets; and/or 2) introduction (adverse) or removal (beneficial) of complete severance with no/full accessibility provision. <p>Walkers and cyclists:</p> <p>>500m increase (adverse) / decrease (beneficial) in walkers and cyclists journey length.</p>
Medium	<p>Community land and assets:</p>

Magnitude of impact	Description
	<p>1) partial loss of/damage to key characteristics, features or elements, e.g. partial removal or substantial amendment to access or acquisition of land compromising viability of property, businesses, community assets or agricultural holdings; and/or</p> <p>2) introduction (adverse) or removal (beneficial) of severe severance with limited / moderate accessibility provision.</p> <p>Walkers and cyclists:</p> <p>>250m - 500m increase (adverse) or decrease (beneficial) in walkers and cyclists journey length.</p>
Small	<p>Community land and assets:</p> <p>1) a discernible change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements, e.g. amendment to access or acquisition of land resulting in changes to operating conditions that do not compromise overall viability of property, businesses, community assets or agricultural holdings; and/or</p> <p>2) introduction (adverse) or removal (beneficial) of severance with adequate accessibility provision.</p> <p>Walkers and cyclists:</p> <p>>50m - 250m increase (adverse) or decrease (beneficial) in walkers and cyclists journey length.</p>
Negligible	<p>Community land and assets:</p> <p>1) very minor loss or detrimental alteration to one or more characteristics, features or elements. e.g. acquisition of non-operational land or buildings not directly affecting the viability of property, businesses, community assets or agricultural holdings; and/or</p> <p>2) very minor introduction (adverse) or removal (beneficial) of severance with ample accessibility provision.</p> <p>Walkers and cyclists:</p> <p><50m increase (adverse) or decrease (beneficial) in walkers and cyclists journey length.</p>
No change	<p>Community land and assets, and walkers and cyclist:</p> <p>No loss or alteration of characteristics, features, elements or accessibility; no observable impact in either direction.</p>

Employment

Construction Phase

Construction Employment Generation

15.2.14. The gross employment generated by the temporary construction phase can be estimated by applying an average gross output per construction industry employee (Ref. 15.16) to the estimated total construction cost. Leakage, displacement, and multiplier effects are then taken into account to determine the total net employment.

Leakage

15.2.15. Leakage effects are the “*proportion of outputs that benefit those outside of the intervention’s target area or group*” (Ref. 15.17). The English Partnership Additionality Guidance (Ref. 15.17) implies that the majority of employment opportunities will go to people living within the target (effect) area. A medium leakage rate as set out by English Partnerships is considered appropriate for the assessment.

Displacement

15.2.16. Displacement measures the extent to which the benefits of a project are offset by a reduction of output or employment elsewhere. Additional demand for labour as a result of the construction phase of the Proposed Development cannot simply be treated as a net benefit as it has the potential to remove workers from other positions, and the net benefit is therefore reduced by the extent that this occurs.

15.2.17. The English Partnerships Additionality Guidance (Ref. 15.17) provides guidance on the levels of displacement. Within the context of an urban construction project, a low level of displacement of 25% is considered appropriate, where “there are expected to be some displacement effects, although only to a limited extent”.

Multiplier Effects

15.2.18. In addition to the direct employment generated by the Proposed Development itself, there will be an increase in local employment arising from “*further economic activity (jobs, expenditure or income) associated with additional local income and local supplier purchases*”; the indirect and induced effects of the construction activity (Ref. 15.17). Employment growth will arise locally through manufacturing services and suppliers to the construction process (indirect or supply linkage multipliers). Additionally, part of the income of the construction workers and suppliers will be spent in North West, generating further employment (induced or income multipliers).

15.2.19. The effects of the multiplier depend on the size of the geographical area that is being considered, the local supply linkages and income leakage from the area. The English Partnerships Additionality Guidance (Ref. 15.17) provides a guide to the composite multipliers (the combined effect of indirect and induced multiplier effects) which should be applied. In line with this guidance, a ‘medium’ multiplier of 1.5 is considered appropriate.

Operation Phase

Detailed Application Site

15.2.20. The average Full Time Equivalent (FTE) employment during operation for the detail application site has been provided by the Applicant by taking holidays, shifts and 7-day operation into account. This number has been used to generate gross FTE and net FTE by applying a leakage rate of 25%, a low level of displacement of 25%, and a 1.5 multiplier (as per English Partnerships Guidance on leakage, displacement, and multipliers) have been applied (Ref. 15.17).

15.2.21. A quantitative assessment of the generation of net Gross Value Added (GVA) operation employment opportunities, has been based on the average FTE generated and ONS Regional GVA (income approach) benchmark (Ref. 15.2) and the scale and size of the Proposed Development.

Outline Application Site

- 15.2.22. Applying HCA Employment Densities Guidance (Ref. 15.16) to the employment generating floorspace within the Proposed Development will provide an estimate of the total gross jobs on-site. To determine the net operational employment, a leakage rate of 25%, a low level of displacement of 25%, and a 1.5 multiplier (as per English Partnerships Guidance on leakage, displacement, and multipliers) have been applied (Ref. 15.17).
- 15.2.23. A quantitative assessment of the generation of net GVA operation employment opportunities, has been based on the ONS Regional GVA (income approach) benchmark (Ref. 15.2) and the scale and size of the Proposed Development.

SIGNIFICANCE CRITERIA

- 15.2.24. The significance level attributed to each effect has been assessed based on the sensitivity/value of the affected receptors and the magnitude of change arising from the Proposed Development, as well as a number of other factors that are outlined in more detail in **Chapter 5: Approach to EIA**. The sensitivity of the affected receptor is assessed on a scale of high, medium, low and negligible, and the magnitude of change is assessed on a scale of large, medium, small, negligible and no change, as set out in **Chapter 5: Approach to EIA**.

EFFECT SIGNIFICANCE

- 15.2.25. The following terms have been used to define the significance of the effects identified for community land and assets, and walkers and cyclists. These have been applied to both beneficial and adverse effects:
- **Major effect:** where the Proposed Development could be expected to have a substantial improvement or deterioration on receptors;
 - **Moderate effect:** where the Proposed Development could be expected to have a noticeable improvement or deterioration on receptors;
 - **Minor effect:** where the Proposed Development could be expected to result in a perceptible improvement or deterioration on receptors; and
 - **Negligible:** where no discernible improvement or deterioration is expected as a result of the Proposed Development on receptors, including instances where no change is confirmed.
- 15.2.26. The following terms have been used to define the significance of the effects identified for employment and applied to both beneficial and adverse effects:
- **Major effect:** all or a large number of receptors are beneficially or adversely affected. The effect is likely to make a substantial positive or negative difference on receptors in the relevant area(s) of effect;
 - **Moderate effect:** a moderate number of receptors are beneficially or adversely affected. The effect is likely to make a measurable positive or negative difference on receptors in the relevant area(s) of effect;
 - **Minor effect:** a small number of receptors are beneficially or adversely affected. The effect is likely to make a small measurable positive or negative difference on receptors in the relevant area(s) of effect; and
 - **Negligible:** no receptors (or very few) are beneficially or adversely affected. The effect is unlikely to make a measurable difference on the receptors in the relevant areas of effect.

15.2.27. As set out in **Chapter 5: Approach to EIA**, effects that are classified as **moderate or above** are considered to be **significant**. Effects classified as below **moderate** are considered to be **not significant**.

15.3 BASELINE CONDITIONS

Community Land and Assets

15.3.1. The application site is located within land designated as Green Belt (Ref. 15.6). The St. Helens Borough Local Plan 2020-2035 Submission Draft (Ref. 15.6) shows that area located near the eastern extent of the application site has been allocated as employment land. It also shows that area located near the western extent of the application site including the potential landscape and ecological mitigation buffer is located within Green Belt land.

15.3.2. The area has also been identified as 'major greenspaces, links and Bold Forest Park' within the draft local plan. It is likely that the area identified is considered to be a recreational facility for local residents and communities, with a medium sensitivity.

Walkers and Cyclists

15.3.3. A Public Rights of Way (PRoW), footpath 102 crosses the application site near the western extent (see **Figure 3.1**) (Ref. 15.18). It is locally designated and provides a link between Old Hall farm and Abbotsfield. Footpath 102 is also part of Bold Loop (previously Ladies' Walk) walking route (Ref. 15.19). A footbridge located above the M62 forms part of the footpath and walking route. It is likely that the footpath is used for recreational purposes, with a medium sensitivity.

15.3.4. No cycle route has been identified within the 500m study area.

Employment

15.3.5. This section provides a review of the context of the application site and considers demographic trends at the St. Helens Council and Warrington Borough Council level, building a picture of the local socio-economic context surrounding the application site.

Population and Labour Force

15.3.6. Both St. Helens and Warrington have seen population growth over the past decades. Between 2008 and 2018, the population in St. Helens increased by 2.8%, from 175,100 to 180,000. This compares with population growth for Warrington of 5.7% over the same time period from 198,200 to 209,500 (Ref. 15.2).

15.3.7. In 2018, 110,200 (61.2%) of St. Helens residents were of working age (16-64 years old, as defined by the Office for National Statistics (ONS)) compared with a Warrington average of 62.5% (131,000) (Ref. 15.2). In the period July 2018 – June 2019, of the working age population in St. Helens, were 78.7% economically active, compared to 78.9% in Warrington (Ref. 15.2). Therefore, working age population and economic activity level are similar in St. Helens and Warrington.

15.3.8. The workforce within St. Helens (Ref. 15.2) has an overall lower level of education attainment compared with Warrington (Ref. 15.2), with 31.0% residents holding an NVQ Level 4 (degree level) qualification compared 40.5% with in Warrington. Attainment at NVQ Level 2 (GCSE level) follows a similar pattern, with 72.8% St. Helens residents holding an NVQ Level 2 qualification compared with 77.8% in Warrington. The numbers of residents with no qualifications are higher within St. Helens (11.6%) when compared with Warrington (8.0%).

Employment and Labour Demand

- 15.3.9. St. Helens has a core business district west of St. Helens city centre, these include Parr Industrial Estate, Reginald Road Industrial Estate and other smaller scale industrial estates and retail parks. They are bounded by the A-roads and railway lines; with a predominance of retail uses and industrial.
- 15.3.10. Within St. Helens the sectoral spread of employment is diverse, with the largest proportions of the workforce employed in the Wholesale and Retail Trade (16.4%), Administrative and Support Services (13.1%) and Human Health and Social Work Activities (11.5%) sectors (Ref. 15.2), as outlined in **Table 15-5**. At a county wide level, sectoral spread is largely similar with the exception of the Professional, Scientific and Technical Activities sector, which is three times higher in Warrington than in St. Helens (17.2% and 5.7% respectively).

Table 15-5 – Employee Jobs

Industry Sector	St. Helens (%)	Warrington (%)
B: Mining and Quarrying	0.0	0.0
C: Manufacturing	9.8	5.2
D: Electricity, Gas, Steam and Air Conditioning Supply	0.1	0.7
E: Water Supply; Sewerage, Waste Management and Remediation Activities	0.7	1.3
F: Construction	5.7	6.0
G: Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	16.4	16.4
H: Transportation and Storage	9.8	6.7
I: Accommodation and Food Service Activities	5.7	5.2
J: Information and Communication	1.3	3.0
K: Financial and Insurance Activities	0.8	1.3
L: Real Estate Activities	1.6	0.9
M: Professional, Scientific and Technical Activities	5.7	17.2
N: Administrative and Support Service Activities	13.1	14.2
O: Public Administration and Defence; Compulsory Social Security	4.1	3.7
P: Education	8.2	5.2
Q: Human Health and Social Work Activities	11.5	9.7
R: Arts, Entertainment and Recreation	2.5	1.5
S: Other Service Activities	2.0	1.5

15.3.11. The NOMIS Job Densities Report (Ref. 15.2), is available on a local authority-wide and sub-regional level and indicates the availability of employment and labour demand. As of 2017, the job density levels (i.e. the ratio of total jobs to the working age population aged 16-64) in St. Helens was 0.65. This is significantly lower than the average across Warrington (1.14) and indicates a worse availability of employment opportunities within St. Helens when compared with Warrington as a whole; with a ratio of less than one job per person.

15.3.12. The Economy and Growth Assessment (Ref. 15.4) identified that levels of entrepreneurship in St. Helens are low, with a widespread out-commuting to area where wage levels are higher.

15.3.13. The St. Helens Council Employment Land Needs Study Addendum Report 2019 (Ref. 15.8) estimates that the employment needs from 2012 to 2037 based on historic trends. The Study states

the need to plan for a significant amount of new B-class employment land and forecasts a requirement of 190 - 239 ha of total employment land needs by 2037. These include B2 General industrial 55 - 70 ha; and B8 Storage and Distribution 110 - 155 ha.

- 15.3.14. According to the Warrington Borough Council Local Plan (2019) (Ref. 15.12), Warrington Borough Council have identified scope for a site at Omega South West within St. Helens Borough (the Proposed Development) to help meet its employment needs.
- 15.3.15. St. Helens Local Plan Authority Monitoring Report 2018 (Ref. 15.5) shows that there was a significant lower number of new employment floor space completed when comparing data in 2016-2017 (4,125 sq m) and 2017-2018 (766 sq m). However, the report states that two out of three targets of Planning Policy CE1 “A Strong and Sustainable Economy” have been met. These targets include the annual generation of 400 additional businesses; and generation of total amount of employment floorspace on previous developed land of 75%.
- 15.3.16. The report states that the target of no loss of industrial and commercial floorspace to other uses has not been met. A larger amount of loss in employment floorspace were encountered when comparing data in 2016-2017 (2,572 sq m) and 2017-2018 (3,591 sq m). However, the report states that the national planning policy recognises that there are circumstances where such losses will be justified (Ref. 15.5).
- 15.3.17. Land has been allocated within the emerging St. Helens Local Plan 2020-2035 for the Proposed Development (Ref. 15.6). The emerging plan also states “...*new well-located employment land and floorspace is essential to the Borough’s future economy prosperity.*” As of March 2018, a total estimate of 215.4 ha of residual employment land is required between 2018 and 2035 (Ref. 15.6).

Local Area Context

- 15.3.18. Local bus services are located in proximity to the application site with the closet bus stop located approximately 255m east. Rail connections including Sankey for Penketh Railway Station is situated approximately 1.8km south east of the application site. The Proposed Development is located immediately south of the M62 which connects Manchester and Liverpool. It provides motorway access to the existing Omega Business Park. The application site’s accessibility and location emphasises the area’s prospect as a business destination.
- 15.3.19. St. Helens Council Employment Land Needs Study (ELNS) (2015) (Ref. 15.7) and the ELNS Addendum Report (2017) (Ref. 15.4) indicate that St. Helens Borough, due to its location on the M6 and M62 motorways, is ideally positioned to provide a critical role in the north-west large scale logistics and distribution sector. The ELNS suggests that whilst traditionally St. Helens Borough has been a manufacturing centre, with the largest land uses including class B2 (general industrial) operations, a strong shift to B8 (storage and distribution) uses is expected to occur. The ELNS Addendum Report identified that the objectively assessed needs (OAN) for employment land needs with up to 239 ha between 2012 and 2037. The identified employment land needs will be a mix of B1(a) office; B1(b) research and development; B1(c) light industry; B2 general industrial; and B8 storage and distribution.

FUTURE BASELINE

- 15.3.20. There will be no change for community land and assets at the future baseline. This is due to no change being anticipated on land identified as ‘major greenspaces, links and Bold Forest Park’.

- 15.3.21. There will be no change for walkers and cyclists at the future baseline. This is due to no change being anticipated on the existing footpath 102 and Bold Loop.
- 15.3.22. There is the potential for economy outcomes to worsen should the anticipated employment floorspace required in St. Helens result in a lower job density level.

15.4 SENSITIVE RECEPTORS

- 15.4.1. The following sensitive receptors have been assessed:
- Community land and assets;
 - Walkers and cyclists; and
 - St. Helens economy.

15.5 LEGISLATIVE FRAMEWORK, POLICY AND GUIDANCE

LEGISLATIVE FRAMEWORK

- 15.5.1. The applicable legislative framework is summarised as follows:
- Countryside and Rights of Way Act 2000 (Ref. 15.20).

POLICY

- 15.5.2. The applicable nation policy includes:
- National Planning Policy Framework (2019) (Ref. 15.11).
- 15.5.3. The applicable local policies are summarised as follows:
- St. Helens Borough Council Draft Local Plan (2020-2025) (Ref. 15.3)
 - Policy LPA04: A Strong and Sustainable Economy;
 - Policy LPA04.1: Strategy Employment Sites; and
 - Policy LPA08: Infrastructure Delivery and Funding.
 - Warrington Borough Council Local Plan (2017-2035) (Ref. 15.12)
 - Policy DEV4: Economic Growth and Development; and
 - Policy INF5: Delivering Infrastructure.

GUIDANCE

- 15.5.4. The following guidance document has been used during the preparation of this chapter:
- Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 6 Population and Human Health (Ref. 15.1).
- 15.5.5. There are no legislative requirements which exist in relation to socio-economics (i.e. employment). Therefore, the assessment is guided by the Government's planning policy and guidance. The following guidance documents have been used during the preparation of this Chapter.
- GVA on behalf of Homes and Community Agency (HCA) (2015) Employment Density Guide 3rd Edition (Ref. 15.16); and
 - GVA on behalf of English Partnerships (2014) Additionality Guide 4th Edition (Ref. 15.17).

15.6 ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION AND RESIDUAL EFFECTS

15.6.1. Tables below provide the assessment of potential construction (**Table 15-6, Table 15-7 and Table 15-8**) and operation phase (**Table 15-9, Table 15-10 and Table 15-11**) effect on the identified population and health receptors.

CONSTRUCTION PHASE

Table 15-6 - Assessment of potential effects on community land and assets, additional mitigation, residual effects and monitoring during construction

Sensitive receptor	Community land and assets
Potential effects	A permanent direct land take from land identified as 'major greenspaces, links and Bold Forest Park' is anticipated to accommodate a section of the outline application site. It is likely that the recreational capacity of the land will be significantly affected during construction.
Additional mitigation	Diversions or alternative access would be provided for any temporary closures providing accesses to community land and assets where necessary.
Residual effects and monitoring	The sensitivity of the community land and assets is medium, and the magnitude of change, following mitigation, is small. Therefore, there is likely to be a direct, permeant, long-term minor adverse residual effect on community land and assets (not significant) following the implementation of mitigation measures.

Table 15-7 – Assessment of potential effects on walkers and cyclists, additional mitigation, residual effects and monitoring during construction

Sensitive receptor	Walkers and cyclists
Potential effects	Footpath 102 and Bold Loop may be temporarily stopped up due to the construction of the proposed pedestrian and cycle route, as well as the potential landscape or ecology mitigation elements near the western extent of the development.
Additional mitigation	A CEMP will be in place and prepared by construction contractors to ensure access to the footpath 102 and Bold Loop is maintained. Footpath 102 and Bold Loop will remain open throughout the construction period where practicable, with diversions put in place where required for public safety reasons and access. Should a temporary diversion or closure be required, agreement and consultation will be made with St. Helens Council. Diversions or closure undertaken during construction will be clearly advertised, and any diversionary routes will have appropriate signage so as not to lead to route uncertainty.

<p>Residual effects and monitoring</p>	<p>The sensitivity of footpath 102 and Bold Loop are medium, and the magnitude of change, following mitigation, is likely to be small in a worst case scenario. Therefore, there is likely to be a direct, temporary, short-term minor adverse residual effect on users of the route (not significant) following the implementation of mitigation measures.</p> <p>The implementation of footpath 102 and Bold Loop access mitigation within the CEMP should be regularly monitored by the construction contractors.</p>
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Table 15-8 - Assessment of potential effects on St. Helens economy, additional mitigation, residual effects and monitoring during construction

<p>Sensitive receptor</p>	<p>St. Helens economy (Construction employment)</p>
<p>Potential effects</p>	<p>Temporary employment created directly through the construction phase will provide a significant short-term boost to the local economy. Construction employment represents a positive economic effect that can be estimated as a function of the scale and type of construction (infrastructure and buildings).</p> <p>The estimated construction period for the detailed application site is approximately 16 months (projected to commence in September 2020 and complete by the end of 2021). Applying an average gross output per construction industry employee to the estimated total construction cost, it is estimated that on average there will likely be approximately 845 gross construction workers on-site per year, totalling approximately 1,267 net construction phase jobs once displacement and indirect and induced effects are taken into account.</p> <p>The importance of sustaining the construction sector in the current economic climate should not be understated, and there are opportunities for local (St. Helens) and regional (North West) economic benefits arising from the construction phase for the detailed application site. By applying an average benchmark of £80,444 GVA per construction employee, it is anticipated that the estimated 1,267 net construction jobs generated by the Proposed Development represent a net additional £76,421,800 GVA to the St. Helens economy, and a net additional £25,500,748 GVA to the North West economy.</p> <p>Construction timescales and programme for the outline application site is unknown at this stage. Hence, construction employment has not been generated or this assessment.</p>
<p>Additional mitigation</p>	<p>There are no mitigation measures required or proposed for Socio-economics in relation to construction employment generation.</p>
<p>Residual effects and monitoring</p>	<p>Given there is no mitigation in relation to construction employment for Socio-economics, the pre-mitigation finding remains the same. Therefore, there is likely to be a direct, temporary, medium-term minor beneficial (not significant) residual effect on the St. Helens economy.</p>

OPERATIONAL PHASE

Table 15-9 - Assessment of potential effects on community land and assets, additional mitigation, residual effects and monitoring during operation

Sensitive receptor	Community land and assets
Potential effects	<p>A permanent direct land take from land identified as 'major greenspaces, links and Bold Forest Park' is anticipated to accommodate a section of the outline application site.</p> <p>A potential landscape and ecological mitigation buffer would locate at the western section of the identified land take from 'major greenspaces, links and Bold Forest Park'. The mitigation buffer is proposed to include woodland, wetlands and grass habitat contributing to the wider Bold Forest Area and potentially improve informal recreational access opportunity. Potential woodland and woodland edge screen planting have been proposed at the western application site boundary edge.</p>
Additional mitigation	There are no mitigation measures required or proposed for community land and assets.
Residual effects and monitoring	<p>The sensitivity of the 'major greenspaces, links and Bold Forest Park' is medium, and the magnitude of change, following mitigation, is small. Therefore, there is likely to be a direct, permanent, long-term minor beneficial residual effect on major greenspaces, links and Bold Forest Park (not significant) following the implementation of mitigation measures.</p> <p>An overall direct, permanent, long-term minor adverse residual effect on community land and assets (not significant) is anticipated following the implementation of mitigation measures.</p>

Table 15-10 – Assessment of potential effects on walkers and cyclists, additional mitigation, residual effects and monitoring during operation

Sensitive receptor	Walkers and cyclists
Potential effects	<p>The Proposed Development includes the provision of pedestrian and cycle routes. The routes will run between the detailed and outline application sites from the eastern extent towards the north western extent. It will link to the existing footpath 102, Bold Loop and the existing footbridge above the M62. It is anticipated to provide extended linkages to longer distance footpaths to Clock Face, Mersey Valley and Mersey Valley Golf Club. This is likely to improve sustainable transport linkage in St. Helens.</p>
Additional mitigation	There are no mitigation measures required or proposed for walkers and cyclists.

Residual effects and monitoring	The sensitivity of walkers and cyclists is medium, and the magnitude of change, is large. Therefore, there is likely to be a direct, permeant, long-term moderate beneficial effect on walkers and cyclists (significant) following the implementation of mitigation measures.
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Table 15-11 - Assessment of potential effects on St. Helens economy, additional mitigation, residual effects and monitoring during operation

Sensitive receptor	St. Helens economy (Operational employment)
Potential effects	<p>The detailed application site includes the erection of B8 logistic warehouses with ancillary offices with a total of 88,663 sq m (Gross External Area) GEA employment floorspace. An estimated 980 average annual Full Time Equivalent (FTE) employment opportunities are likely to be associated with the detailed application site. After taking into account displacement effects (reductions of output or employment elsewhere) and indirect and induced multiplier effects (relating to spending of employees and of suppliers), the total net employment is estimated at 1,103 FTE jobs associated with the detailed application site, of which approximately 827 FTE jobs will likely be taken up by residents within St. Helens, and 276 FTE jobs will be taken by residents within the North West. By applying an average benchmark of £45,846 GVA per warehouse employee, it is anticipated that the likely generation of approximately 1,103 net warehouse FTE jobs by the Proposed Development would represent an additional £37,914,642 GVA to the economy within St. Helens and £12,653,496 GVA to the economy within the North West.</p> <p>The outline application site includes the erection of B8 logistic warehouses with 67,750 sq m GEA employment floorspace and B2 manufacturing with 61,600 Gross Internal Area (GIA) employment floorspace. An estimated 2,679 gross employment opportunities are likely to be associated with the outline application site. After taking into account displacement effects (reductions of output or employment elsewhere) and indirect and induced multiplier effects (relating to spending of employees and of suppliers), the total net employment is estimated at 3,014 jobs associated with the outline application site, of which approximately 2,260 will likely be taken up by residents within St. Helens, and 753 will be taken by residents within the North West. By applying an average benchmark of £45,846 GVA per industrial employee, the likely generation of approximately 3,014 net warehouse and industrial jobs by the Proposed Development would represent an additional net £103,611,960 GVA to the economy within St. Helens and net £34,522,038 GVA to the economy within the North West</p> <p>It is anticipated that an estimated £141,526,602 GVA to the economy within St. Helens and £47,175,534 GVA to the economy within the North West would be contributed by the Proposed Development during operation. This emphasises the importance and benefits of the Proposed Development of generating jobs opportunities within St. Helens and the wider area (<i>assumption of one FTE equates to one employment job generated has been applied</i>).</p>
Additional mitigation	There are no mitigation measures required or proposed for Socio-economics in relation to operational employment generation. It is not considered appropriate for there to be any monitoring arrangements.

Residual effects and monitoring	Given there is no mitigation in relation to operational employment for Socio-economics, the pre-mitigation finding remains the same. Therefore, there is likely to be a direct, permanent, long-term moderate beneficial effect on St. Helens economy (significant).
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ASSESSMENT AGAINST FUTURE BASELINE

- 15.6.2. There is potential land take from ‘major greenspaces, links and Bold Forest Park’ during construction and potential improvement in recreation accessibility during operation.
- 15.6.3. There is potential disruption on existing footpath 102 and Bold Loop is anticipated during construction. During operation, there is likely to be improved connectivity between footpaths and local communities located in proximity to the Proposed Development.
- 15.6.4. There is an expected increase in employment and GVA generation for St. Helens during construction and operation of the Proposed Development.

CUMULATIVE EFFECTS

- 15.6.5. The construction of the Proposed Development along with the committed developments identified will generate additional construction related employment. The scale of the construction employment generated cannot be readily quantified on the basis of the information available for each development as this information is commercially sensitive. In addition, the timing and phasing of the construction of these developments along with the Proposed Development may not occur over the same time periods, therefore the temporary construction related effects may not coincide.
- 15.6.6. The construction cumulative effects of the developments in combination with the Proposed Development are likely to have a direct, temporary, medium-term moderate beneficial effect on construction employment (significant). This is due to the potential for the committed developments to generate a large amount of construction employment. There are no mitigation or monitoring measures required in relation to the construction phase cumulative developments.
- 15.6.7. No other industrial and warehouse development has been identified. Hence, no inter-project cumulative effect during operation.

15.7 OPPORTUNITIES FOR ENHANCEMENT

- 15.7.1. No additional opportunities for enhancement have been identified apart from the embedded mitigation stated in **Chapter 3: Description of the Proposed Development**.

15.8 LIMITATIONS AND ASSUMPTIONS

- 15.8.1. Limitations and assumptions identified for the population and health assessment are as follows:
 - Data has been collected through desk based study only using publicly available sources.
 - Construction employment for the outline application site has not been included in the assessment. This is because construction timescales and programme for the outline application site is unknown at this stage.
 - An assumption of one FTE equals to one employment generation has been applied.
 - Average annual FTE to be generated by the detailed application site (Unit 1) has been provided by the Applicant. This number has been used to generate the predicted GVA for the detailed application site (Unit 1). Whilst predicted GVA to be generated by the outline application site has been generated by the proposed employment floorspace.



15.9 SUMMARY

15.9.1. **Table 15-12** provides a summary of the findings of the assessment.



Table 15-12 - Summary of population and health effects

Receptor	Potential Effects	Additional Mitigation	Residual Effects	Monitoring
Construction Phase				
Community land and assets	Permanent direct land take of 'major greenspaces, links and Bold Forest Park'.	Diversions or alternative accesses would be provided for any temporary closures providing accesses to community land and assets where necessary.	Minor Adverse (not significant) P / D / LT	N/A
Walkers and cyclists	Potential disruption on footpath 102 and Bold Loop.	<p>A CEMP will be in place to ensure access to footpath and walking route will be maintained.</p> <p>Footpath and walking route will remain open throughout the construction period where practicable, with diversions put in place where required for public safety reasons and access.</p> <p>Should a temporary diversion or closure be required, agreement and consultation will be made with relevant local authority. Diversions or closure undertaken during</p>	Minor Adverse (not significant) T / D / ST	The implementation of footpath 102 and Bold Loop access mitigation within the CEMP should be regularly monitored by the construction contractors.



Receptor	Potential Effects	Additional Mitigation	Residual Effects	Monitoring
		construction will be clearly advertised, and any diversionary routes will have appropriate signage so as not to lead to route uncertainty.		
St. Helens economy (Construction employment)	<p>Approximately 1,126 gross and 1,267 net construction workers are likely to be generated by the detailed application site per year.</p> <p>These represent a net additional £76,421,800 GVA to the St. Helens economy and £25,500,748 GVA to the North West economy.</p>	N/A	<p>Minor Beneficial (not significant)</p> <p>T / D / MT</p>	N/A
Operational Phase				
Community land and assets	<p>Permanent direct land take from 'major greenspaces, links and Bold Forest Park'.</p> <p>Potential landscape and ecological enhancement.</p>	N/A	<p>Minor Adverse (not significant)</p> <p>P / D / LT</p>	N/A
Walkers and cyclists	Provision of new pedestrian and cycle routes, where extended linkages to longer distance	N/A	<p>Moderate Beneficial (significant)</p> <p>P / D / LT</p>	N/A

Receptor	Potential Effects	Additional Mitigation	Residual Effects	Monitoring
	<p>footpaths to communities nearby are anticipated.</p> <p>Potential improvement in sustainable transport linkage in St. Helens.</p>			
St. Helens economy (Operational employment)	<p>Approximately 1,103 net FTE employment opportunities are likely to be associated with the detailed application site.</p> <p>Approximately 3,014 net FTE employment opportunities are likely to be associated with the outline application site.</p> <p>These represent an additional £141,526,602 net GVA to the St. Helens economy.</p>	N/A	<p>Moderate Beneficial (significant)</p> <p>P / D / LT</p>	N/A

■ Key to table:

P / T = Permanent or Temporary, D / I = Direct or Indirect, ST. / MT / LT = Short Term, Medium Term or Long Term, N/A = Not Applicable

15.10 REFERENCES

- Ref. 15.1: Highways England (2019). Design Manual for Road and Bridges, Volume 11, Section 3, Part 6 Population and Human Health (LA 112).
- Ref. 15.2: Office for National Statistics (ONS) (2018). NOMIS
- Ref. 15.3: St. Helens Borough Council (2019). St. Helens Borough Local Plan 2020-2035, Submission Draft January 2019. A Balanced Plan for a Better Future. [Online] Accessed via <https://www.sthelens.gov.uk/media/9525/local-plan-written-plan-web.pdf>, 04 December 2019
- Ref. 15.4: St. Helens Borough Council (2019). Employment Land Needs Study – Addendum Report (October 2017 – Amended January 2019)
- Ref. 15.5: St. Helens Borough Council (2018). St. Helens Local Plan Authority Monitoring Report 2018
- Ref. 15.6: St. Helens Borough Council (2019). St. Helens Borough Local Plan 2020-2035 Submission Draft
- Ref. 15.7: St. Helens Borough Council (2015). Employment Lands Needs Study. [Online] Accessed via https://www.sthelens.gov.uk/media/3021/St._helens_employment_land_needs_study_october_2015.pdf
- Ref. 15.8: St. Helens Borough Council (2017). Employment Lands Needs Study Addendum Report. [Online] Accessed via https://www.sthelens.gov.uk/media/9437/elna-addendum-report-draft-final-update-jan-2019_final.pdf
- Ref. 15.9: St. Helens Council (2018). St. Helens Economic Viability Assessment. [Online] Accessed via <https://www.sthelens.gov.uk/media/9480/eva-2019-full-doc.pdf>
- Ref. 15.10: St. Helens Council (2018). Infrastructure Delivery Plan.
- Ref. 15.11: Ministry of Housing, Communities and Local Government. (2019). National Planning Policy Framework. [Online] Accessed via https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
- Ref. 15.12: Warrington Borough Council (2019). Warrington Borough Council Local Plan 2017-2035. [Online] Accessed via https://www.warrington.gov.uk/sites/default/files/2019-09/proposed_submission_version_local_plan_v4.pdf
- Ref. 15.13: Warrington Borough Council (2019). Economic Development Needs Assessment. [Online] Accessed via https://www.warrington.gov.uk/sites/default/files/2019-09/warrington_edna_2019_-_final_report.pdfhttps://www.warrington.gov.uk/sites/default/files/2019-09/warrington_edna_2019_-_final_report.pdf
- Ref. 15.14: Warrington and Co. (2017). Warrington Means Business. [Online] Accessed via <http://warringtonandco.com/wp-content/uploads/2017/01/Warrington-Means-Business-December-2016.pdf>
- Ref. 15.15: Cheshire and Warrington Local Enterprise Partnership (2017). [Online] Accessed via <http://www.871candwep.co.uk/content/uploads/2018/07/SEP.pdf>
- Ref. 15.16: GVA for Homes and Communities Agency (2015). Employment Density Guide 3rd Edition.
- Ref. 15.17: GVA for English Partnerships (2014). Additionality Guide 4th Edition.
- Ref. 15.18: RoWmaps (2019). St. Helens Rights of Way map. [Online] Accessed via <https://www.rowmaps.com/showmap.php?place=St.%20Helens&map=OS&lat=53.4553&lon=2.73817&lonew=W>



- Ref. 15.19: The Mersey Forest (2019). Bold Loop. [Online] Accessed via <https://www.merseyforest.org.uk/things-to-do/walks-bike-rides-and-more/walks/bold-loop/>
- Ref. 15.20: Countryside and Rights of Way Act 2000. [Online] Accessed via <http://www.legislation.gov.uk/ukpga/2000/37/contents>



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