

Response of Grappenhall and Thelwall Parish Council to Warrington Borough Council's Local Plan proposals

Introduction

Grappenhall and Thelwall Parish Council is a member of the South Warrington Parish Councils Local Plan Working Group. This Working Group has submitted its response to the Local Plan which represents the shared and agreed view of a group of seven Parish Councils from South Warrington.

The Grappenhall and Thelwall Parish Council has engaged Groves Town Planning to prepare its own single-parish response to the Local Plan (Proposed Submission Version) 2019 to ensure that specific issues relevant to Grappenhall and Thelwall also find a place in the overall response of the public to the Local Plan. That document accompanies this letter.

The Grappenhall and Thelwall Parish Council wishes to make it clear that its local response is based on, and is additional to, the Working Group's response, which it supports fully. It is therefore necessary to read the two documents together. It will be seen that there is of course much common material between the two responses and for the sake of clarity and to assist the review of both documents the present letter provides a summary of the additional, local issues raised in Grappenhall and Thelwall's response.

That summary is provided below with section headings taken from that local response.

Growth

5.3; The impact of the PSV's unprecedented and unjustifiable proposals for Growth falls most heavily on Grappenhall. The Garden Suburb and the Strategic Link within it will remove massive amounts of Green Belt land from Grappenhall.

Housing Supply

6.5; Poor assessment of housing supply requirements unnecessarily prompts consideration of the release of highly-valued Green Belt within the Parish.

Employment Land

7.6, 7.7, 7.8, 7.9; Although South Warrington may be attractive for development to logistics firms, there is no clear economic justification presented in the PSV to overcome the presumption against development in this part of Green Belt. The proposal is not supported by assessment by WBC's own advisers who rated the Green Belt in Grappenhall as strongly meeting Green Belt objectives and purposes. Appleton Thorn will lose its identity as a distinct settlement.

Green Belt

8.2; The historic value of the settlements of Grappenhall and Thelwall is reflected by Conservation Area status which is in turn heavily dependent on a Green Belt setting. The Arup assessment of the Green Belt is flawed.

8.12 and 8.15; The PSV ignores the impact of the Bridgewater Canal corridor as a sound and logical boundary to the urban areas to the south of Warrington. The proposals of the PSV represent encroachment into the countryside and will result in the merger of the long-established distinct settlements of Grappenhall and Appleton Thorn.

8.14; The proposals of the PSV will alter the topography of Grappenhall and affect the setting of Grappenhall Village.

8.15; The Garden Suburb will remove the separation of Grappenhall from Appleton Thorn and the separation of Grappenhall Heys from Stockton Heath.

8.16; Green Belt protection will be removed from Grappenhall Village including the land between the Bridgewater Canal and the northern edge of the village.

Infrastructure

9.1; The PSV accepts that the proposals put pressure on a highway system that is already failing. For Grappenhall and Thelwall, the critical points of the highway system are the swing bridges of the Ship Canal, especially the Latchford swing bridge which controls the A50 crossing-point, and the Cantilever bridge. The WMMTM says that the existing highway system can accommodate the extra traffic generated by the Local Plan proposals but it relies on the false assumption that the swing bridges do not close (see 10.3).

9.5, 9.12, 9.23; The PSV asserts that highway shortfalls can be addressed, but the Garden Suburb will simply put new traffic on the existing network, so it is hard to see anything other than further congestion and worse linkage to the town centre.

9.8, 9.13; There is no strategy to bring about a modal shift and no plan to address congestion at key points.

9.10; Proposals for highways within the Garden Suburb are associated with the employment area and its logistics, with a focus on motorway access. Local car traffic including employees getting to work is not properly considered.

9.11; The one new road, the Strategic Link, will have a major impact at the A49 junction with M56; this has not been thought through.

Air Quality

10.2 – 10.12; The proposals can only result in poorer air quality throughout the Parish and there is no plan to extend monitoring, for example on A50 Grappenhall Road. The plan seems only to be to await technological change which is certain to be delayed until beyond the plan period, or await modal change. There is no clarity on how modal change is to be brought about. The use of the WMMTM is flawed for the purpose of evaluating air quality as it takes no account of the operation of the swing bridges, when stationary traffic creates the most pollution.

Environment

11.1; The plan for the Garden Suburb fails to deliver adequate levels of environmental amenity for both new and existing residents.

11.2; The Garden Suburb will experience high noise levels from both M6 and M56.

Ecology

12.3; Large areas of green fields will be lost and there will be a significant and severe effect on biodiversity.

Character and Distinctiveness

13.1; The PSV says 'the character of Warrington's places will be maintained and enhanced....a town centre surrounded by attractive countryside and distinct settlements'.....'the unique elements of the historic, built and natural environment will be well looked-after, well managed, well used and enjoyed'. For Grappenhall at least, there is no clarity as to how this ambition can be achieved; the result of the plan for Grappenhall will be wholly negative.

13.3; WBC's advice on Conservation Areas declares that 'it is the location of settlements within a wider rural context that provides the distinctive character of Warrington. Warrington is distinct from other towns in the industrial heart of what was South Lancashire insofar as the manner in which the urban settlement sits within open countryside and is surrounded by a ring of smaller, distinct and distinguishable separate settlements'. The 2014 Core Strategy recognised this asset and sought to protect it. The proposals of the PSV provide no clarity at all on how the distinctive character of the town can be maintained and are not consistent with the Core Strategy.

13.4; The PSV does not assess views in and out of the urban area which are today provided by the open space which wraps around South Warrington. These views will be lost as a consequence of the Garden Suburb.

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**Grappenhall and Thelwall Parish
Council Representations to the
Submission Draft of the Warrington
Borough Local Plan**



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1 Introduction

1.1 Groves Town Planning has been commissioned to prepare representations to the submission draft of the Warrington Local Plan.

1.2 Grappenhall and Thelwall Parish Council is a member of the South Warrington Parish Council's Local Plan Working Group (SWP). The Parish Council fully endorses the work of that group and the representations made on its behalf, but considered that it was appropriate to also present its own representation, mandated through separate public consultation within the community that it represents.

1.3 The representation is set out as follows

- National Policy Context
- Parish Portrait
- Summary of issues leading to the conclusion that the plan is not sound and should not be adopted in its present form.
- Issues relating to Growth
- Issues relating to Housing Supply
- Issues relating to Employment Land
- Issues relating to Green Belt release
- Issues relating to infrastructure provision
- Issues relating to Environment and Air Quality
- Issues relating to Ecology
- Issues relating to Character and Distinctiveness
- Appraisal of specific policies

1.4 A conclusion will appraise these issues and how in the opinion of the Parish Council they show that the plan is not sound and should not proceed to adoption in its present form.

1.5 This stage of the process has been reached following the publication of a Preferred Developments Option (PDO) in June 2017. The PDO was produced with limited preamble or discussion as to possible issues prior to publication. The scale of the development proposed directly contradicted the extant development in terms of approach and objectives. It was not surprising therefore that it attracted a high level of concern and anxiety in the community. The implied level of precision shown in plans resulted in unprecedented concern over the impact of highways schemes and other development proposals on resident's homes and business. The PDO attracted over 4500 responses.

2 National Policy Context

2.1 It is recognised that the Council has statutory obligation to produce a development plan – *“ which 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.”* [NPPF 2019 para 15]

2.1 Relevant paragraphs of the Framework are summarised below with sections relevant to the core of this representation highlighted.

2.2 *“Achieving sustainable development means that the planning system has three overarching objectives.... an economic objective; a social objective and an environmental objective.*

These objectives should be delivered through the preparation and implementation of plan.....” [NPPF 2019 Paras 8 and 9]

2.3 *“Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Strategic policies should as a minimum provide for the objectively assessed needs for housing and other uses, as well as needs that cannot be met within neighbouring areas, unless:*

- *The application of policies within this Framework that protect assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- *Any adverse impacts of doing so would so significantly outweigh the benefits when assessed against the policies in this Framework as a whole.”* [NPPF 2019

Para 11]

2.4 *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 to help local people to shape their surroundings.*

Plans should:

- *Be prepared with the objective of contributing to the achievement of sustainable development;*
- *Be prepared positively, in way that is aspirational but deliverable;*
- *Be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- *Be accessible through digital tools to assist in public involvement and policy presentation; and*
- *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. [NPPF 2019 Paras 15 and 16]*

2.5 *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...except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms. [NPPF 2019 Para 23]*

2.6 *The preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focused tightly*

on supporting and justifying the policies concerned, and take into account relevant market signals. [NPPF 2019 Para 31]

2.7 *Significant adverse impacts of these objectives should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where sufficient adverse impacts are unavoidable, suitable mitigation measures should be proposed. [NPPF 2019 Para 32]*

2.8 *Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing required along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure) Such policies should not undermine the deliverability of the plan. [NPPF 2019 Para 34]*

2.9 *Plans are sound if they are positively prepared and are consistent with achieving sustainable development; are justified if based on proportionate evidence; are effective in being deliverable within the plan period and consistent with national policy [NPPF 2019 Para 35]*

2.10 *"It is important that a sufficient amount and variety of land can come forward where it is needed..." [NPPF 2019 Para 59]*

2.11 *".. the minimum number of homes needed... should be informed by a local housing needs assessment.... unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends..." [NPPF 2019 Para 60]*

2.12 *"...policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. [NPPF 2019 Para 61]*

- 2.13 *The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities strategic policy making authorities should identify suitable locations for such development where this can help to meet needs in a sustainable way. [NPPF 2019 Para 72]*
- 2.14 *“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should set out the specific rate of development for specific sites. [NPPF 2019 Para 73]*
- 2.15 Planning policies should support economic growth. Areas should build on their strengths. Each area should build on its strengths and counter any weaknesses. Planning policies should recognise and address specific locational requirements of different sectors including for storage and distribution in suitably accessible locations. [NPPF 2019 Paras 80-82]
- 2.16 Planning policies should support the role that town centres play at the heart of local communities [NPPF 2019 Para 85]
- 2.17 Planning policies should aim to achieve healthy, inclusive and safe places which ensure an integrated approach to considering the location of housing, economic uses and community facilities and services [NPPF Paras 91 and 92]
- 2.18 Transport should be considered from the earliest stages of plan making. *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine*

choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health". [NPPF 2019 Para 103]

2.19 Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding the environment and ensuring safe and healthy living conditions. Objectively assessed needs should be met in a manner which makes as much use as possible of previously developed land. [NPPF 2019 Para 117]

2.20 Planning policies should ensure that developments

- Function well and add to the overall quality of the area;
- Are visually attractive
- Are sympathetic to local character and history, including the surrounding built environment and landscaping setting;
- Establish and maintain a strong sense of place... welcoming and distinctive places to live work and visit. [NPPF 2019 Para 127]

2.21 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. [NPPF 2019 Para 133]

2.22 *"Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation and 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."*

"Before concluding that exceptional circumstances exist for changes to Green Belt boundaries, the strategic policy making authority should be able to demonstrate

that it has fully examined all other reasonable options for meeting its identified need for development". [NPPF 2019 Paras 136 and 137]

2.23 Where it found necessary to release land from the Green Belt first consideration should be given to previously developed land or land which is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environment quality and accessibility of remaining Green Belt land. [NPPF 2019 Para 138]

2.24 Planning policies should contribute and enhance the natural and local environment, recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services. Development should wherever possible help improve local environmental conditions. [NPPF 2019 Para 170]

2.25 Planning policies should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment. [NPPF Para 180]

2.26 Planning policies should sustain and contribute towards compliance with relevant limits for air quality [NPPF 2019 Para 181]

2.27 Existing businesses and facilities should not be unreasonably restricted as a result of new development [NPPF 2019 Para 183]

2.28 Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.

- Sustaining and enhancing the significance of heritage assets

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- Considering the desirability of new development making a positive contribution to local character and distinctiveness. [NPPF 2019 Para 185]

2.29 Local Planning authorities should identify and assess the significance of a heritage asset affected by a proposal. Where development would lead to substantial harm to the asset development should be resisted unless substantial public benefit outweighs that harm. [NPPF 2019 Para 195]

3.1 To fully understand the Parish, its context within Warrington and the wider area it considered important to record some of the key characteristics of the area, to provide a background to the evidence presented in support of the conclusions of the representation.

3.2 In 2003 the Parish Council produced a Village Design Statement. Although dated to some degree, the descriptive elements of this document remain of value.

3.3 There is evidence of settlement in Grappenhall from 1900BC, with documentary reference in the Domesday Book of 1086. Thelwall is first mentioned in the Anglo-Saxon Chronicle in the 890's. The settlements became established as Cheshire flourished as an agricultural area, with associated rural industry, such a leather processing taking place in Grappenhall and Thelwall.

3.4 Separate administrative parishes were established in 1894 and although merged in 1936, the Parish was only designated Grappenhall and Thelwall in 1974.

3.5 Early scattered settlement with large country houses, farms and cottages, were increasingly developed as Warrington became a centre for industry and the villages came increasingly under its influence, becoming the semi-rural suburb which the Parish is today.

3.6 The Village Design Statement which was adopted by the Borough Council set out to ensure that development was managed in such a way so as to protect the essential character of the area; safeguarding and enhancing the Conservation Areas at the heart of each village, and protecting the rural character and the countryside which

provides the backdrop for the villages. Aerial photographs at page 5 and 11 of the VDG provide illustration of the setting of both villages.

3.7 The Guide notes how the edges of the settlements are defined by transition into rural, open countryside, providing a setting for development.

3.8 Vistas from the from higher ground to the south reveal glimpses of St Wifrid's Parish Church and the Grappenhall Village Conservation Area.

3.9 Grappenhall and Thelwall are situated in South Warrington, an area which is characterised by a collection of small settlements and villages. The settlements of Walton, Stockton Heath, Grappenhall, Thelwall and Lymm all lie to the south of the Manchester Ship Canal. Each area has seen considerable development across the middle and later parts of the 20th century but each benefits from a historic core often based around the earliest settlements in the area. These historic cores are identified as designated heritage assets. Each benefits from a setting within the Bridgewater Canal corridor and the close proximity of open countryside, the majority which lies within the North Cheshire Green Belt as formally defined in successive development plans since the early 1990's.

3.10 Grappenhall and Thelwall typically has an older and aging population compared to the rest of Warrington. The area has lower levels of deprivation, longer life expectancy and better health. In comparison with national and Warrington averages, higher numbers of residents in South Warrington are employed in professional and managerial roles and are much more likely to use the car as a means of travel to work. [WBC Ward Profiles 2018 and LGA Research Report – Demographic Report 2017]

3.11 The proximity of the motorway network to this part of South Warrington is highly influential over travel to work patterns and locations chosen to access retail and leisure facilities.

3.12 The presence of the Manchester Ship Canal and the Bridgewater Canal impacts on the character of the area and the patterns of activity which residents follow. Routes into Warrington Town Centre are congested, particularly around the crossing points of the MSC at Latchford swing bridge and Latchford high level bridge. Congestion is particularly a problem on the A50 when the bridge is opened to allow ships to pass along the Canal.

3.13 With the exception of the A50, bridges across the Bridgewater Canal are single track, 18th century structures.

3.14 The Bridgewater Canal provides a clear edge to the settlement, particular to the south of Grappenhall. The scale of development proposed would have a clear and detrimental impact on many of the features noted in the VDS as contributing to the character of the area.

4 Summary of Key Issues

4.1 It is the contention of the Parish Council that the Submission Draft Local Plan is not sound and fails to meet the expectations of paragraph 16 of the NPPF.

4.2 The Plan has not been positively prepared; is not appropriately justified; is not effective or deliverable and shows inconsistencies with national policy.

4.3 The plan is not sound and should not proceed to adoption in its present form.

4.4 This conclusion is reached on the premise that

- There is no justification for predicted levels of growth which are central the spatial expression of the plan
- There is sound or logical connection between aspirational growth and the spatial plan.
- There is consequently no justified need for the level of housing or employment development anticipated by the plan.
- There is no need for the scale of Green Belt release proposed in Grappenhall and Thelwall.
- There is no rational consideration of the existing levels of congestion or the impact of development on that congestion, which are particularly apparent in Grappenhall and Thelwall.
- Proposed infrastructure does not deal with existing pressures or issues of congestion and cannot therefore accommodate the additional demands of the proposed development. There is a dependence of 18th and 19th Century infrastructure to accommodate the traffic generated by the proposed development.

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- There is no need for development which will result in an unacceptable level of harm to air quality and the environment
- There is no need for development which will destroy the character and distinctiveness of Grappenhall and Thelwall and its constituent settlements.
- The proposals are not sustainable and run counter to national policy.
- There is no clarity or certainty of the means of delivery of the planned proposals. Funding methodologies are flawed and unreliable and based on the unreliable returns expected from growth and development.

5.1 The Borough Council published an Economic Development Needs Assessment Update produced by Mickledore and BE Group in February 2019. Critically for Grappenhall and Thelwall, the Study amongst other issues highlights the following.

- The strong connections between economic activity in Warrington and activity in neighbouring areas, notably Cheshire East and Cheshire West, Greater Manchester and Liverpool, highlighting development identified in the Greater Manchester Spatial Framework and the potential needs of the Port of Liverpool.
- How growth in Warrington is predicated by competition for a share of the wider economic development across the region.
- Competition for growth based on the Science and professional sectors in Halton, Cheshire and Manchester.
- Dependence on historic high levels of take up of employment land
- The use of the LEP Strategic Economic Plan (SEP) Jobs Growth Scenario in predicting growth.
- Logistics land requirements driven by proximity to motorway junctions.
- Variation in forecasts from alternative providers.

5.2 The Parish Council is concerned that the approach taken to consideration of growth is unreliable and unrealistic. It is acknowledged as being underpinned by the unsubstantiated and business driven expectations of the SEP. These ambitions are not democratically accountable and are led by business interests with direct

involvement in land released for development on back of the Needs Assessment. This concern is reinforced by the evidence of three different assessments with three different conclusions as to levels of growth produced at the point of production of the Preferred Development Option. Grappenhall and Thelwall PC's views are aligned with those of the SWP in this regard.

5.3 The key consideration for Grappenhall and Thelwall Parish which arises from the exaggeration of levels of attainable growth, is the manner in which this interpreted as a driver for development which, in the view of the Submission Draft Plan can only be accommodated by massive levels of Green Belt release, mostly in South Warrington, with the Garden Suburb of huge consequence for Grappenhall and Thelwall.

Key Challenges as to Soundness

Growth levels are based on the unsubstantiated ambitions of the Strategic Economic Plan of the LEP and Warrington Means Business. The ambitions are dated and fail to recognise later economic trends.

Growth levels are unrealistic and undeliverable based largely on an unpredictable and transient logistics market.

There are contradictory assessments as to the expectations of growth especially at the point of production of the preferred developments option. The 18 month period between the PDO consultation and the Submission Draft has seen the need for considerable modification in previously predicted levels of growth, with limited alteration to the scale of development proposed.

There is less certainty of the advent of the later phases of HS2 and no realistic expectation that Northern Powerhouse Rail will reach Warrington within the plan period.

There is no track record of the delivery of growth at the continuous and high levels predicted.

The Council should be challenged to demonstrate, how untested aspirational expectations for population, household and employment growth can be measured against historic trends and how those patterns of growth are distorted simply as a consequence of higher levels of land availability.

6 Housing Supply

- 6.1 Given the clear and obvious weaknesses in assertions by the Borough Council over predicted levels of growth, it would seem unrealistic to seek to achieve the averaged delivery of 945 dwellings per annum as envisaged in the submission draft.
- 6.2 There is considerable local concern and confusion at how the housing figures have been arrived at and how they are interpreted as justification for the wholesale release of land from the Green Belt.
- 6.3 The Parish Council would again seek reference to the shared view on housing supply presented in the representations of the SWP.
- 6.4 Reference should also be made to the specific comment on the SWUE elsewhere in this representation.
- 6.5 Key to the Parish Council's concern is that poor assessment of housing supply requirements unnecessarily prompts consideration of the release of highly valued green belt within the Parish.

Keys Challenges as to Soundness

The scale of housing development proposed needs to be sense checked. There is little evidence to suggest that development at the rate suggested has ever been achieved – there must be a "sense checking" exercise to assess the realism of achieving the levels of housing need and the ability to deliver that need.

Application of the affordability ratio in Warrington represents a distortion of the true levels of need. Figures produced need to be assessed against the particular characteristics of the local housing market.

There is a disconnect between the scale of housing development expected and the relationship with employment sectors which are expected to support that growth.

Historic housing completion rates suggest the level of house building in Warrington since 2007/8 has on average reached only 55% of the level anticipated in the Submission Draft.

In order to properly understand the housing market in Warrington it is necessary to consider the town's history and development across the last 4 decades, together with changes in the town's employment base and the impact of changes in legislation and guidance.

Household formation projections are based on 2014 figures and are unreliable as a means of anticipating levels of growth in Walton and South Warrington

Control over the rate of delivery will not be in the determined by the Council. Developers and their approach to the economics of the housing market will dictate the rate of completion. On that basis the economic basis for development to fund infrastructure is unreliable and unsound.

The availability of green field sites in the Green Belt is a disincentive for developers to pursue, more complex and costly development of previously developed sites in the urban area.

A 15 year plan with the focus of development on the use of existing urban capacity will prevent the premature release of Green Belt prior to full and complete realisation of the potential of brown field sites. This approach would also enable resolution of the Fiddler's Ferry issue prior to excessive release of Green Belt.

Density figures in the plan require a "sense check" There has been no discussion prior to the release of the Submission Draft of the approach to density, the consideration of very high density in the urban areas.

7 Employment Land

7.1 The largest single employment land allocation is mostly within Appleton Parish but immediately abuts and impacts heavily on Grappenhall and Thelwall. As a signatory to the representations made by SWP in respect of the wider impacts of the proposals of the submission draft on South Warrington as a whole, the Parish Council would support the contention that logistics based employment development in South Warrington is unnecessary and would fail to deliver the stated economic and social benefits claimed and necessary to justify release of such a large area of land from the Green Belt.

7.2 The proposed employment related development within the Warrington Waterfront and to some extent the expansion of Omega will impact upon Grappenhall and Thelwall. The impact of the poorly considered Western Link Road is assessed in later sections of this submission. It is noted however that the link road will benefit and provide access to the new development but will have severe ramifications for the existing highway network in South Warrington, including the A50 and the A56. The Western Link will draw traffic through residential areas on already congested routes.

7.3 The preceding analysis of housing supply has considered the overstated levels of growth, stemming from an aspirational but unrealistic position adopted in the SEP.

7.4 It is not disputed that the geographically, strategic position of Warrington makes the area an attractive location for logistics development, but the principle purpose of the plan should be to manage this growth against a background of the wider public interest and other material planning considerations. The fact that even at this stage of the local plan process, applications for planning permission are in place for the

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majority of the employment allocation proposed for South Warrington is a demonstration of how demand for development should be managed and not sanctioned purely on the basis that it will result in growth.

7.5 Should the employment land at Appleton Thorn come to be allocated through this plan process it would seem likely to come forward early in the plan period, prior to any infrastructure improvements, particularly connectivity to appropriate sources of labour and the wider highway network required to effectively accommodate large scale additional freight movements, entirely by HGVs.

7.6 The area in South Warrington selected for development appears to be based on three main considerations

- Proximity to junction 20 of the M6
- Ability to accommodate the requirements of existing businesses
- Ownership and control of the allocated site.

7.7 This is considered by the Borough Council to outweigh harm resulting from the development of Green Belt which is identified by its own advisors as strongly meeting Green Belt objectives and purposes. Ecological and landscape appraisal is weak and understated in order to weigh in favour of the economic arguments. The development proposed subsumes the village of Appleton Thorn which will lose much if not all of its identity as a distinct settlement. This is in distinct contrast to the approach applied in consideration of development in North Warrington

7.8 Planning application 2017/31757 submitted by Eddie Stobart Ltd and others for land within the proposed allocation provides illustration of the absence of a clear economic justification for development of a Green Belt site. Submissions made with that application demonstrated how the majority of staff employed at Stobart's

existing premises reside outside the Borough. Those residing within the Borough typically live north of the Manchester Ship Canal and rely on the private car for transportation to and from the site. Theoretical assessment of spend and impact on GVA do not accurately reflect this position.

7.9 The submission of a further application on the remaining part of the land identified as a proposed allocation, may to some extent reflect the attraction of Warrington as a location for logistics development but this should not be seen as a reason for large scale release of Green Belt based on dubious consideration of issues of sustainability or economic benefit.

7.10 It would appear that the questionable aspiration to provide the Western Link as a means of managing congestion at the Bridgefoot Junctions has prompted the need to encourage development capable of funding the proposed highway infrastructure. The financial case of the Western Link submitted to the DfT notes the prudential borrowing by the Council would be underpinned by New Homes Bonus, NNDR and developer contributions secured through the release of land for development in the Green Belt within the Warrington Waterfront.

7.11 The Parish Council's objection to this approach extends to concern that the Western Link Road decants traffic from the employment allocation onto the highway network onto the existing roads of South Warrington.

Key challenges as to Soundness

Previous development plans since the 1980's have accepted that Green Belt in South Warrington serves the purposes and functions of the Green Belt. The basis to now alter this position is not sound.

The release of Green Belt for employment land at the scale proposed is not warranted.

The location of development in semi rural parts of the Green Belt flies in the face the aspiration of the LTP seeking development in sustainable locations.

8.1 Paragraph 136 of the NPPF notes

"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 endure beyond the plan period. Where a need for changes to the Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans".

8.2 It should be noted that the ARUP assessment spends sometime considering the approach and justification for review particularly against housing need, whilst stating that its purpose is to appraise the effectiveness of the Green Belt against current policy objectives and acknowledged Green Belt functions. To some readers this may create a justifiable concern that this appraisal sets out to justify the Council's expectations rather than providing an unbiased assessment of the Green Belt in Warrington irrespective of consequences for subsequent policy review.

- The general rationale for a highly methodological approach is understood, but it is worthy of note that throughout the assessment there is consistent reference to the need for the application of professional judgement. It is considered that the approach adopted displays a number of flaws. It is over simplistic to parcel and section the Green Belt in the manner utilised by the

assessment. Warrington's Green Belt largely functions as a single entity. With few exceptions the parcels serve the purposes of the Green Belt in conjunction with one another not as a single area of function.

- Reliance on use of defensible boundaries to define parcels limits the proper assessment of areas. Whilst it may ultimately be necessary to look to boundaries consistent with NPPF and NPPG guidance interferes with understanding and assessment of the purposes served by the Green Belt. This approach effectively concludes that development should be allowed to continue up to the point that a durable boundary with the Green belt can be established.
- The approach taken in the assessment wrongly assumes that sprawl can only relate to the main settlement boundary. This approach is flawed. If that approach applied there would often be little purpose in inseting settlement in the Green Belt. The definition of sprawl implies that it is possible that planned and managed growth cannot represent sprawl? The assessment fails to appreciate the extent and nature of the historic growth of Warrington resulting in existing sprawl which should be contained.

The balanced debate over the weight to be given to Green Belt purpose relating to the protection of historic towns is noted. However once it is accepted that consideration should be given to the heritage value of the town centre and Lymm through conservation area status, consistency requires the same approach to conservation area designation in Thelwall, Grappenhall, Stockton Heath, Walton and Moore. The historic value of these conservation areas is heavily dependent on setting provided by the Green Belt.

8.3 It is concluded that whilst the assessment provides a useful discussion tool, it is weak in providing evidence of sufficient clarity and certainty to properly assist and to justify, the tests for excluding parts of the Green Belt from continued protection.

8.4 It is considered that an alternative approach to assessment of the value of Green Belt would continue to be based on the five purposes of the Green Belt but to review these against the key issues and function which impact on the current function of the Green Belt.

8.5 The detail of the Green Belt appraisal submitted within the evidence base presented with the Submission Draft, particularly in the context of South West Warrington, attracts criticism notwithstanding any subsequent consideration of any justification for its release.

8.6 The Green Belt surrounding Grappenhall and Thelwall is appraised in the ARUP assessment. The appraisal identifies a number of sites as making a strong or moderate contribution to the purposes and functions of the Green Belt. Notably strongly functioning sites are shown around Appleton Thorn yet these sites have been allocated for employment use. There is no clear justification as to the basis for this decision.

8.7 The proposed scale of Green Belt release creates a number of tensions with the function and purpose of the Green Belt.

- The proposed release of Green Belt will result in the unrestricted sprawl of the built up area. The assessment only views sprawl in the context of outward sprawl from Warrington. If a parcel is not currently adjoining the settlement boundary it is classed as having limited impact against this purpose of the Green Belt. This skews a quantitative assessment and does

not consider the ultimate impact on function of the Green Belt as a single entity.

- The Garden Suburb allocation extends development beyond any established boundary

8.8 It is worthy of note that with the exception of Winwick, none of the settlements in the north of the Borough retained within the Green Belt, have designated heritage value which Green Belt designation might be designed to protect.

8.9 Warrington's Green Belt has to be seen in context. It does not exist in isolation but functions alongside and with the Green Belts of North Cheshire, Gtr Manchester and Liverpool. Changes to the Green Belt in Warrington are highly likely to be influential on the policies of the two adjoining city regions and the individual authorities within. The approaches of New Town driven policy of the 1970s and 80's has changed dramatically. Rather than seeking to create new economic opportunities and better housing outside the cities, Warrington's neighbours have seen massive change in the economic function and environmental regeneration of city centre and inner city areas. This must impact on development in Warrington which is ultimately reflected in the role of Warrington's Green Belt.

8.10 The Borough Council's assessment ignores the impact of the Bridgewater Canal corridor as a sound and logical boundary to the urban area on the south side of Warrington. The release of the land to the south of the Canal would represent encroachment into the open countryside and the merger of pockets of development and long established, distinct and historic settlements. Previous local plans and the submission draft all make reference to the key characteristic of Warrington as an

urban core, with distinct settlements surrounding the town and set in attractive rural surroundings.

8.11 No account is taken of the importance of the topography of the area proposed to be occupied by the Garden Suburb. The land steadily slopes downwards to the north by 50m. This has two critical impacts. Firstly, views from the Bridgewater Canal look south up the slope with tree lines and existing development at Grappenhall Heyes providing ample illustration of the impact of a developed area occupying this space. This would affect the openness of the Green Belt when viewed from Knutsford Road, Australia Lane, Broad Lane and Lumb Brook Road in particular. Secondly, views south to the Parish Church and the historic core of Warrington from Wrights Green, Broad Lane and Knutsford Road would be altered. The setting of the centre of Walton and of Grappenhall Village would be changed to the considerable detriment of the locality. The Green Belt function of protecting the setting of historic settlements is eroded.

8.12 The Garden Suburb removes the separation of Grappenhall from Appleton Thorn and Grappenhall Heys. Grappenhall Heys would no longer be separated from Stockton Heath and Appleton. Stretton would be subsumed into development north of Appleton.

8.13 The Green Belt designation describes Grappenhall Village as a Green Belt village, washed over by the Green Belt. Plans seem to contradict and confuse this position placing a new Green Belt boundary east of the A50. The edges of the Village are no longer protected from development with the previous weight of Green Belt policy. This appears to include the land providing a narrow separation between the Bridgewater Canal and the northern edge of the settlement.

Key Challenges as to Soundness

There is no clear and proven evidence to justify the scale and form of Green Belt release proposed. The Submission Draft fails to adequately consider the requirements of the NPPF in suggesting such levels of release.

The assessment of current areas of Green Belt is weak and in places erroneous. Although purporting to provide for a methodical and analytical approach to assessing the value of land against the 5 purposes of the Green Belt the approach still relies on judgement, which in a number of cases can be contested.

There are instances with the proposed SWUE and the Garden Suburb where Green Belt which has been identified as performing strongly against the purposes of Green Belt is shown to be released and made available for development. Other less areas which are noted as performing less strongly are retained in the Green Belt.

The scale and location of Green Belt release undermines the wider objectives of the Plan. The release of relatively easy to develop land will impact on the take up and development of more difficult urban sites. Release of Green Belt will directly conflict with the purpose of the Green Belt to promote and support urban regeneration.

The physical and functional disconnect between the south of Warrington and the town centre will be exacerbated by the paucity of transport connections. Notwithstanding the scale of development proposed, economic benefit will not accrue to town centre as a product of and justification for the release of the Green Belt.

The extended plan period is used to justify the release of more Green Belt than is necessary. In so doing the end view of the Plan fails to properly account for the potential release of additional previously developed urban sites which would be able to support land availability for housing and employment in locations where social and economic benefit would accrue to a greater extent.

9.1 The scale and form of the development proposed in South Warrington – particularly that focused on the Garden Suburb and the SW Urban Extension is acknowledged resulting in increased trips by all transport modes. [Submission Draft 7.2.1] There is clear acceptance of additional pressures on an already failing network including highway infrastructure.

Transport Infrastructure - Road

9.2 The Submission Draft and related evidence base, the emerging Local Transport Plan (LTP4) paint a picture of the existing highway network across Warrington. Network development is constrained by the three watercourses which cross the Borough from east to west – the River Mersey, the Manchester Ship Canal and the Bridgewater Canal. The crossing points of these barriers are critical to the function of the highway network.

9.3 The Submission Draft relies upon the Warrington Multi Modal Transport Model 2016 as its base for assessment of the impacts of and the mitigation for the scale of new development proposed. An AECOM report within the evidence base notes that development allocations would impose a significant pressure on the transport network.

9.4 It is considered that there are a number of issues raised by the Transport Model which merit challenge. These are fully appraised in the representations of the SWP, which the Parish Council fully endorses.

9.5 The Submission Draft recognises the need to address shortfalls in highway infrastructure provision, improve connectivity and network efficiency to support economic growth, whilst reducing the need to travel in the private car, improve

safety, tackle air quality, encourage active lifestyles and supporting transformational change in transport networks and services (Submission Draft – March 2019 Para 7.1.3)

9.6 In reality the Plan fails to deliver any tangible way in delivering these objectives other than relieving congestion in a few locations whilst letting it grow elsewhere.

9.7 The Submission Draft considers that development will meet the twin aims of accessibility and sustainability (in transportation terms). Development in South Warrington will not achieve either. The SW Urban Extension and Garden Suburb are isolated from key facilities and likely sources of employment. There are no improvements to key linkages to the town centre which might even loosely be considered to support regeneration objectives.

9.8 A key theme to the submission draft (and LTP4) is to secure modal shift. This underpins ambitions to ensure sustainable development, improvements in air quality and lifestyle but the plan provides no tangible means of delivering this ambition. The absence of any plans to deal with key points of congestion, Stockton Village, Stockton Heath and Latchford Swing bridges, Latchford Village, Grappenhall Road, Lumbrook Bridge, Wilderspool Causeway result in a failure to demonstrate how public transport and cycling can be diverted away from congested and heavily trafficked routes.

9.9 . The Plan requires the new, large scale developments in South Warrington to ensure that traffic generation has no adverse impact on the local community. [Submission Draft Policy INF1]. The Garden Suburb would totally and absolutely rely on routes through existing communities to gain access to the main highway network. Access to the proposed development would rely on the A50 through Grappenhall. Routes via Broad Lane and Lumbrook Road would have inevitable and detrimental impact on the established local community.

9.10 The proposed employment development within the Garden Suburb focuses solely on the impact of traffic from the site gaining access to the motorway network. There are proposals to improve local junctions, largely to accommodate queuing, but the improvements fail to take account of car traffic using the route, additional traffic as employees will travel to work on the site. The proposals also fail to recognise the frequent occurrences of traffic being unable to enter the motorway slip roads because of congestion on the motorway itself. Junctions are blocked and a potential for gridlock is created.

9.11 The Garden Suburb Strategic Link Road provides limited clarity as to its function. It would appear to provide a route for all vehicles across the Garden Suburb to reach the A49 and junction 10 of the M56 at Stretton. No consideration is given to the capacity for, or implications of the creation of such a major junction onto A49

9.12 In reality, and assuming the objectives for growth and town centre regeneration can be secured, traffic from the SW Urban Extension, Garden Suburb and Lymm, together with the Warrington Waterfront development will need to pass over the unimproved highway network of South of Warrington Town Centre.

9.13 The Local Highway Authority has presented the proposed Western Link as an alternative route into the town centre or for traffic to reach Omega and employment areas west of the town. Should this be the case the Link would draw traffic through Stockton Heath and Walton from the proposed new developments.

9.14 The impact of the development proposed for South Warrington will have a clear, significant and adverse impact on existing communities the area, including some areas which experience the higher levels of deprivation in the Borough. Development

proposals would load additional traffic onto parts of the highway network where Air Quality is an issue and routes already designated as AQMAs.

9.15 The Submission Draft notes that it will be a requirement that trips generated by development can be adequately accommodated by Warrington's transport network. Clearly this is the correct approach but the policy fails in any attempt to define "adequate". It could be argued that the existing trip base is not adequately served. Traffic flows at key points on the network are severely constrained. For example-

- A49 Winwick Road
- A57 Sankey Way
- A49 Stockton Heath
- A49 Wilderspool
- Chester Road
- Latchford High Level Bridge
- A50 Grappenhall
- A56 Walton
- A49/A5061 Warrington Town Centre
- A50 Padgate

9.16 Congestion and delays at these points provide demonstration of the need for major improvements to infrastructure provision prior to any additional development taking place. This does not mean localised improvement but improvements which address wider impacts across the whole network.

9.17 A major barrier to this approach is of course funding. The business case for the Western Link demonstrates that it is the development proposed which creates potential funding for infrastructure improvements. In the case of the Western Link

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prudential borrowing by the Council will ultimately be supported through business rates, New Homes Bonus and CIL/S106. There is no similar business case for the Strategic Link Road but it appears that funding will come from developer contributions repeating concern of the ability of proposals to remain viable when such large demand is placed on these contributions.

9.18 The River Mersey is crossed at 5 points within the Borough although two provide general routes – from west to east

- Gateworth (a dedicated crossing to Arpley Waste Disposal Site)
- Centre Park (a dedicated crossing to the Centre Park business park)
- Bridgefoot (crossing of the A49 and A5061 in Warrington Town centre)
- Kingsway Bridge (crossing of the A50 in East Warrington)
- Thelwall Viaduct (M6)

9.19 The Manchester Ship Canal is crossed at 6 points, although Moore Swing Bridge provides access to a limited area.

- Moore Swing Bridge (partly in Halton)
- Chester Road Swing Bridge (A56)
- Stockton Heath Swing Bridge (A49)
- Latchford High Level Bridge
- Latchford Swing Bridge (A50)
- Thelwall Viaduct (M6)

9.20 The Bridgewater Canal is crossed by main roads at:

- Walton (A56 Chester Road)
- Stockton Heath (A49 London Road)
- Grappenhall (A50 Knutsford Road)

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- Thelwall Viaduct (M56)
- Lymm (A56 Booths Hill Lane)

9.21 The Bridgewater canal is also crossed a various points through routes using original 18th century canal infrastructure

- Acton Grange Bridge
- Warrington Road (Walton)
- Hough Lane (Walton)
- Red Lane (Stockton Heath)
- Lumb Brook Bridge (Stockton Heath)
- Stanny Lunt Bridge (Grappenhall)
- Church Lane Bridge (Grappenhall)
- Knutsford Road/Weaste Lane (Grappenhall)
- Bell Lane (Thelwall)
- Star Lane (Lymm)
- Whitbarrow Road (Lymm)
- Lymm Bridge (Lymm)
- Oughtrington Lane (Oughtrington)
- Burford Lane (Heatley)

9.22 Proposals to develop land for 9000 dwellings and 116 ha of land for employment purposes show limited realistic appraisal of the ability of the existing highway network to accommodate this scale of development.

9.23 The Submission Draft shows only one additional crossing of the Manchester Ship Canal and two crossings of the Mersey (including the committed Chester Road Crossing to serve Centre Park) and no additional crossings of the Bridgewater Canal.

The largest single element of the Submission Draft – the Garden Suburb would be linked to the existing highway network by three already congested main roads. The A49, the A56 and the A50. Principle points of access to these routes would rely on bridges across the Bridgewater Canal constructed in the 18th Century

Transport Infrastructure Rail

9.24 The Plan aspires to encourage and support the use of multi-modal freight transport facilities. The majority of employment allocations in the plan relate to logistics based developments. No site has any current rail access and relies almost entirely on road freight. With the exception of Port Warrington the largest sites have no possibility of connection to the rail network. [Submission Draft INF1]

9.25 In the absence of a rail link to Port Warrington vessels on the Ship Canal will need to use road based transport, with implications for additional traffic on the highway network in South Warrington.

9.26 The Plan relies on transformational infrastructure provision of this kind yet shows no clear understanding of the complex interrelationships between development and infrastructure and misses the opportunity to properly plan for the implications of such development. The approach reaffirms concern that the Plan is an exercise in Urban Design rather than a holistically prepared plan which is sound when tested against the requirements of the Framework.

Community and Health Infrastructure

9.27 The Plan alludes to the provision of community and health infrastructure as key elements to sites allocated for development, but provides little or no substance as to the means by which such facilities will be delivered and then how ongoing viability will be secured.

Key Challenges as to Soundness

The Plan sets as a key objective the ability of new development to contribute to the relief of existing issues with traffic congestion. The Plan not only fails to deliver against this objective but would result in additional traffic which would compound and exacerbate existing issues with congestion

The ability deliver the required infrastructure to properly serve the development allocations doubted. There is insufficient certainty over delivery of transport, education and health infrastructure. Routes and sites are ill defined. The wider consenting processes needed are unclear and in many cases lie outside the Council's direct control.

The proposed infrastructure provision has the potential to worsen, rather than to deal with current issues of air quality and pollution resulting from road traffic emissions.

10 Air Quality

10.1 There are a number of existing air quality management areas in Warrington. These are based around the motorway corridors of the M6, M56 and the M62 and the A49 as it enters the town centre. Grappenhall and Thelwall are affected particularly by the M6 AQMA on an elevated stretch of road carrying one of the busiest stretches of the national motorway network.

10.2 The proposals contained within the submission draft increase the risk of problems arising from poor air quality.

10.3 The Air Quality Management Study produced with the Plan notes that traffic levels are based on the Multi-modal Transport Model, the veracity of which is commented on above. If as suspected the model anticipates traffic flows which assume no closures of the Ship Canal Swing bridges it follows that the assessment of impact of development on air quality is similarly flawed.

10.4 There is no clarity as to how the seismic modal shift in transportation will transit from road based travel to work and freight movement. Employment allocations rely heavily on the logistics sector and road based transport onto an already highly congested network. Initial infrastructure improvements will be focused on highway development. Public transport infrastructure is only planned for the end of the plan period or beyond.

10.5 The Air Quality Management Study assumes that increases in traffic, which is currently the main source of air pollution, will be balanced by technological changes which will remove road vehicles as a source of NO₂ and harmful particulates by 2040. This is of course outside the Plan period and cannot assume that parts of the

development would not take place before changes in technology come into effect.

The Plan assumes that development will reach a peak in the mid 2020's – some 15 years prior to these additional controls and measures coming into force.

10.6 The Air Quality Management Study notes the impact of traffic speed on pollution and air quality. It is difficult to judge from the technical data provided as to how much weight this has been given. Given comments noted above it is clearly a concern that congestion on the A49 and A56 will increase as a result of the development proposed. The impact of closures of the swing bridges receives no consideration in the report. The Study does not take account of the changing pattern of vehicle movement on the A56 as a consequence of the additional traffic light controlled junctions between Runcorn Road and the Chester Road Swing Bridge, including the junction to serve the Western Link. There is greater possibility for vehicles to be stopping and starting along this stretch, not just at peak period.

10.7 It is unclear as to the extent of impact of air quality as HGVs traverse the steep grade of the Western Link as it climbs to cross the Ship Canal in a short distance.

10.8 The report notes a number of locations where air quality is currently a matter of concern. These areas will potentially suffer from air quality which is below emerging international WHO standards. Understandably these routes coincide with major traffic arteries, with key receptors identified as those dwellings and buildings at the edge of the highway. The study fails to take account of the significance of many of these routes as thoroughfares – London Road in Stockton Heath, or as the pedestrian and cycle routes envisaged as key elements of the modal shift away from car transport and the consequent number of people as opposed to physical receptors exposed to the high levels of pollution.

10.9 The WHO Ambient Air Quality Database v11 – 29 May 2018 identifies towns and cities exceeding the recommended WHO limit of $10\mu\text{g}/\text{m}^3$ for PM2.5. At $14\mu\text{g}/\text{m}^3$ Warrington is considered to have one of the highest levels for this type of particulate in the UK. The WBC Air Quality Action Plan notes strong evidence of impact from PM2.5 but has only one monitoring site, on Selby Street adjacent to the A57 on the western side of the town centre, to measure levels, and notes that there have been no assessments of any hot spots where concentration could result in raised levels. Review of available data from the Selby Street monitor suggests levels of between 30 and $85\mu\text{g}/\text{m}^3$, levels which are considered dangerous by the WHO.

10.10 There are no other monitoring sites in South Warrington, particularly in locations where traffic volumes and congestion are known issues. Notwithstanding the considerable increase in traffic created by the proposed allocations there is no indication of increased monitoring of air quality. The Garden Suburb will inevitably increase congestion on the A50 Knutsford Road, Latchford Swing Bridge and critically in the vicinity of schools in Latchford.

10.11 As noted above the Plan depends on the additional transport demands it creates being accommodated through modal shift or their impact lessened through technological change reducing vehicle emissions. At best this might be achieved at the end or after the plan period in the late 2030's or 2040's. The scale of development will, in the medium to long term, perpetuate issues of pollution levels across Warrington at a level acknowledged as damaging to health.

10.12 Policy ENV8 of the Submission Draft seeks to resist new developments which have an adverse impact on air quality. The scale of development proposed in the SWUE and the Garden Suburb would seem to undermine this objective, exposing residents

to higher levels of NO₂ and PM2.5 with consequent issues for morbidity and premature mortality.

Key Challenges as to Soundness

Elements of the Plan are contradictory in respect of air quality. The Air Quality Assessment background paper suggests that technological change will enable the impact of new development to have limited effect on air quality, whereas specific policies within the plan seek to limit the scale of development in the interests of protection from air pollution. Proposed policy also seeks to resist development within or close to any AQMA including the motorway network

The plan does not reference the fact that, although monitoring is poor across the Borough, what limited information there is suggests Warrington already suffers some of the poorest levels of air quality in the Country and that this contributes health problems and can be linked to illness and premature death. There is no complete analysis of the true impacts of the scale of development proposed and consequent use of the transport network in terms of air quality.

Reduction in emissions through technological change and/or modal shift will only come at the end of the plan period, when much of the development will have been in place for many years.

A growth focused plan based largely on logistics as a key driver is an anathema to the Plans objective of securing improvement to environment and air quality.

In an appeal decision relating to land at Peel Hall Warrington [APP/M0655/W/17/3178530] rejected proposals as a consequence of the unacceptable level of appraisal of the potential impact on air quality. The Submission Draft fails to meet the same hurdle, in terms of impact on both existing and future residents.

NPPF Para 181 indicates a requirement that opportunities to improve air quality should be considered at the plan making stage to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. The Submission Draft is unsound in this regard.

11.1 The Plan is presented as a mechanism to ensure that new development is located and designed in such a manner so as not to result in cumulative impact on the natural environment. Development is expected to evaluate and minimise the risk of adverse impact to air, land and water quality, whilst assessing, vibration, light and noise pollution. It is considered that the developments proposed for the SWUE, the Garden Suburb and Lymm would not only fail to deliver adequate levels of amenity for new residents but would significantly and detrimentally impact on the quality of the environment available to existing residents of the Borough.

11.2 Much of the proposed development is located to the motorway corridors of the M6 and the M56. Development on the western side of Lymm encroaches into existing open space which currently separates the settlement from the elevated section of the M6 as it crosses Thelwall Viaduct. The viaduct carries upwards of 160 000 vehicles per day with consequent high levels of noise and a continuous background of traffic.

11.3 Similarly parts of the proposed Garden Suburb will be exposed to a poor quality environment exposed the constant drone of traffic using the M6 and M56.

11.4 The Garden Suburb is poorly located. It straddles a gas pipeline. There is no clarity as to how watercourses which cross the site will be sustainably managed and how development will avoid increased flood risk within already developed areas. Residential development, existing and proposed is placed in close proximity to proposed 24/7 logistics uses. Brightly lit, frequent vehicle movements with consequent noise and activity the proposed logistics activities replicate existing uses

which are the source of complaint in respect of problems caused to existing residential properties in the area.

11.5 Increased residential presence in close proximity to existing commercial brings the prospect of increased restriction on commercial activity, contrary to the provisions of Para 182 of the NPPF.

Key Challenges as to Soundness

The locations selected for development would fail to meet policy objectives for the protection of the environment.

Development areas are subject to poor quality environments as a consequence of noise and light pollution, particularly as a result of proximity to the motorway network.

New infrastructure, including the Western Link and Southern Strategic Link road would bring their own issues in terms of environmental impact.

New residential development is inappropriately located relative to proposed and existing commercial activity.

12 Ecology

12.1 Warrington as a whole has limited ecological resource which merits more than local recognition. Local nature reserves and local wildlife sites as designated in the Local Plan Core Strategy are scattered across the South Warrington area.

12.2 The Moore Nature Reserve is designated as a Local Wildlife Site. The site will be directly affected by the Warrington Waterfront and Port Warrington proposals.

12.3 Much of the area to be given over to development in the SWUE, the Garden Suburb in and around Lymm is currently in agricultural use. Possibly as consequence of the generally lower levels of agricultural classification the areas are not intensively farmed, with hedgerows, watercourses, ponds and copses of woodland are retained. This not only provides a characterful and distinct backdrop to the urban area but does provide habitat for a range of local wildlife including protected species. The loss of large areas of green field to development will have a significant and severe impact on the biodiversity of the area.

12.4 The HRA [AECOM March 2019] presented in support of the Submission draft identifies potential significant effect of the Rixton Clay Pits and Manchester Mosses Special Areas of Conservation resulting from development at the SWUE and Garden Suburb, particularly due to issues associated with air quality and increased recreation. The HRA concludes that "without mitigation, increased residential, employment and retail development is likely to contribute additional pollutant emissions within the Borough of Warrington compared to a position of no growth". Perversely the HRA suggests that control should be imposed on development which produces additional vehicle movements on the M62 to enable air quality relating to the Manchester

Mosses to be taken into account. Proposed policy E8 reflects this position. No account is taken by the Council of the significance of such air quality issues for human receptors. Acceptance of the proposed growth in this context is dependent on the ongoing reduction of emissions from transport. As with wider consideration of issues of Air Quality it is contended that this is a dubious approach as reduction emissions comes at the end of the Plan period and takes no account of the impact of development throughout the Plan period and prior to factors which reduce emissions coming into play.

Key Challenges as to Soundness

The HRA correctly considers impact on areas of recognised, international conservation value. The Plan does not appropriately consider local ecological impacts and the changes brought about by the development and urbanisation of large areas of land which are currently open countryside

The HRA recognises the issues which arise from large scale development in terms of impact on air quality and identifies a risk of harm to the Special Conservation Areas. It is recommended through the HRA that measures are put in place to protect these areas. This approach is inconsistent with the approach to air quality elsewhere in the plan.

13 Character and Distinctiveness

13.1 The Submission Draft Local Plan establishes the character and distinctiveness of Warrington as a place to live and work as a key element of the vision for the plan.

“The character of Warrington’s places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed.” [Vision Warrington 2037 Para 6 Warrington BC Submission Draft Local Plan March 2019]

13.2 It is the submission of the Parish Council that the plan wholly fails to achieve this objective. The Plan has a wholly negative impact on the South of Warrington and Grappenhall and Thelwall in particular. The Plan is unsound in that regard.

13.3 A series of advisory leaflets for conservation areas was produced by the Borough Council in 2000 which outline the reasons for conservation area status of the conservation areas in Walton, Grappenhall and Thelwall, Hatton and Lymm. In each case it is recognised that it is the location of settlements within a wider rural context that provides for the distinctive character of Warrington. Warrington is distinct from other towns in the industrial heart of what was South Lancashire, insofar as the manner in which the urban settlement sits within open countryside and is surrounded by a ring of smaller, distinctive and distinguishable separate settlements. The 2014 Core Strategy recognised this asset and sought to protect it.

13.4 The Plan deals superficially with landscape appraisal, and fails to properly assess the views into and out of the urban area provided by open space which wraps around South Warrington. The main arterial routes into Warrington from the south, the A56, the A50 and the A49 descend the southern slopes of the Mersey Valley. Expansive views of the town are possible from these routes and a range of public viewpoints across the area. Views across this landscape will be lost as a consequence of development proposed in SWUE and the Garden Suburb

13.5 It is a distinctive characteristic of south and north Warrington that villages have maintained some degree of separation from the main built up areas. Walton and Grappenhall Villages are close to built up areas but even then small areas of open land, within the Green Belt, enable distinction from wider development. Lymm, Appleton Thorn, Stretton and Hatton read as distinct settlements, separated from the urban areas to the north. This position applies equally to the villages of Culcheth, Croft, Winwick and Burtonwood in the north of the Borough, although the plan affords more weight to the protection of their distinctiveness.

13.6 The objectives of the Plan as set out in the Vision for the Submission Draft are not secured.

Key Challenges as to Soundness

The plan does not fully and properly appraise the value of the existing landscape.

The stated objective of retaining character and distinctiveness is not met.

14 Sustainability

14.1 Section 2 of the NPPF establishes that the purpose of the planning system is to contribute the achievement of sustainable development – “meeting the needs of the present without compromising the ability of future generations to meet their own needs”.

14.2 There are three overarching objectives underpinning the achievement of sustainability

- An economic objective
- A social objective
- An environmental objective

14.3 The Submission Draft Plan fails when tested against each of these objectives.

14.4 The economic basis for the Plan is unsound. The Plan is overly ambitious and predicts levels of growth which are supported by unrealistic drivers, or promoted purely through developer ambition to exploit the strategic location of the Borough without consideration of the consequences. The Plan fails to recognise the complexities of Warrington’s economy and its relationships with activity in adjoining areas across the northwest.

14.5 The ability of the development promoted in the plan to deliver the infrastructure requirements, the benefits of regeneration in the town centre and support to the health and wellbeing of residents of the Borough is misunderstood and not achievable. Land for development is not in the right places to serve the needs of residents of the Borough and there is clear disconnect between ambitious levels of development and the co-ordination of the delivery of infrastructure.

14.6 The Plan does not support strong and vibrant communities. Employment and accessible and affordable housing is in the wrong place to support existing residents seeking employment. Development will reinforce existing patterns of travel to work, with Warrington importing workers in lower paid less skilled roles and exporting more highly skilled and higher paid workers into Liverpool and Manchester.

14.7 The Plan proposed development which will have a dramatic and devastating impact of the environment. The proposals undermine biodiversity in promoting green field development alternative strategies could better exploit regeneration and better use of previously developed land. The proposed development can only be delivered in a manner which relies heavily on the use of the private car and the transportation of freight by road. The evidence base submitted with the plan demonstrates how this makes an existing, unsatisfactory position in terms of pollution and air quality even worse.

Key challenges as to soundness

The Plan fails to demonstrate that the development which is proposed delivers the objectives of the NPPF in terms of achieving sustainable development.

15 Deliverability

15.1 The deliverability of the plan can be questioned in a number of ways.

- Unachievable levels of growth
- Failure to deliver housing development at the levels now forecast
- Ability to fund and deliver suggested infrastructure requirements
- Viability

15.2 The rationale behind the expected level of growth and the scale of housing development to support that growth is assessed in section 5 above.

15.3 Trajectories within the evidence base provided with the Submission Draft demonstrate the complexity of housing delivery in Warrington, to the extent that that in the mid-2000s the Council introduced a moratorium for new housing development. These trajectories demonstrate that notwithstanding the availability of sites housing completions have not reached the levels anticipated by the Plan. This not only has consequences in securing the number of units expected, but would also impact on the Council's ability to secure funding through developer contributions for key elements of infrastructure required to support the development proposed.

15.4 It is unclear whether the proposals and the level of infrastructure required to support development can be funded. The Infrastructure Delivery Plan provided as evidence base to the Submission Draft includes a range of transport, environmental and community based infrastructure requirements needed to support development. The Council assumes that funding will come from forward funding of key infrastructure requirements and resourced through an allocation of infrastructure costs on a per dwelling basis secured through planning obligations. However the IDP

notes that discussion of the mechanics of this funding process is the subject of ongoing discussion. The Plan cannot be considered sound in the absence of certainty over these funding arrangements and the impact of additional costs per dwelling on overall viability. This will inevitably beg the question of the ability and willingness of developers to deliver affordable housing, open space and other provision if demands for strategic infrastructure provision question viability.

15.5 The ability to fund and to deliver infrastructure is so unclear so as to confirm the view of many that development will take place and infrastructure will lag behind, leaving problems of under provision, increased difficulty in accessing services and more congestion.

15.6 The as yet unfunded projects identified in the IDP which relate to the Garden Suburb appear to total in excess of £350m. This equates approximately to £60k per dwelling. As it stands it is very difficult to see how the proposals can viably support the infrastructure requirements.

15.7 The SWP does not have access to resources and information necessary to properly interrogate costs attributed to different elements of infrastructure proposed. It is considered however that given the critical requirement to deliver infrastructure on programme and alongside any proposed development, that the Council must provide clarity on the cost analysis of infrastructure provision.

15.8 The LTP4 is presented alongside the Submission Draft on the basis that it demonstrates the package of transport infrastructure provision which is expected to be in place to serve the proposed development. The SWP and the affiliated Rethinking South Warrington's Future (RSWF) Group have submitted their observations on the content and veracity of the LTP. These representations do not

seek to rehearse those submissions, but would note the range of legitimate questions, highlighting flaws and issues within the LTP, which would raise similar concerns over the deliverability of the complete package of transport infrastructure needed to support the scale and form of development proposed.

Key Challenges as to Soundness

The Submission Draft proposes large scale development which will only operate successfully if a comprehensive range of infrastructure is in place.

The mechanics for funding such levels of infrastructure remain unknown.

Funding will depend on development progressing and delivering funding through developer contributions. Given uncertainty over the ability to deliver housing at a rate in excess of recent levels of completions raises equal uncertainty over the ability to fund and deliver required infrastructure in a timely fashion.

The Plan and evidence base fail to provide certainty over costs and therefore to interrogate the viability of passing these costs onto developers through planning obligations.

The LTP4 is presented in parallel to the submission draft so as to demonstrate the level of infrastructure needed to support the development proposed. The LTP includes flaws and unsubstantiated assumptions which bring into doubt the ability to match development with infrastructure provision.

16 Appraisal of Specific Policies

Policy/Statement number	Policy Objective	Comment
Vision - Warrington 2037 4 (p17)	" The intersection of the two new major national rail routes, HS2 and Northern Powerhouse Rail in Warrington will further enhance the Town's strategic connectivity"	<i>This is speculative with no certainty as to direct linkage to HS2 and no specific proposals for Northern Powerhouse rail</i>
6 (p18)	" The character of Warrington's places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements"	<i>See section 14</i>
W1(p20)	"...sustainable growth of Warrington through ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure..."	<i>The plan will not deliver sustainable growth. The release of Green Belt will threaten not support regeneration of inner Warrington</i>
W2(p21)	"To ensure revised Green Belt boundaries maintain the permanence of the Green Belt in the long term"	<i>See section 8</i>
W3(p21)	Strengthening the role of Warrington Town Centre	<i>The release of Green Belt for employment and residential development in South Warrington will reinforce the disconnect</i>

		<i>between residents and use of the town. Residents will continue to use ready access to the motorway network to access, town centre retail and leisure in more attractive locations</i>
W4(p21)	Providing new infrastructure and services to support growth and address congestion	<i>New infrastructure will not achieve both objectives. New infrastructure will just shift the location of congestion and will continue to place demand on the existing highway network. New infrastructure will be insufficient to meet the increased demand created by new development</i>
W5(p21)	"...reinforces character and distinctiveness...whilst protecting, enhancing and embracing the Borough's historic, cultural, built and natural assets".	<i>Character and distinctiveness will be considerable diminished. Historic and cultural assets will be harmed.</i>
3.3.17	<p>Alternative locations for Green Belt release were outperformed by the chosen spatial strategy</p> <ul style="list-style-type: none"> • Dispersed pattern makes it harder to deliver required infrastructure • Development to the west leads to issues of meeting Warrington and Widnes and issues with social and physical infrastructure • Extension to the north impacts on A49 	<p><i>The tests applied to consider Green Belt release were flawed, dependent on subjective assessment and weighted to consider one green belt purpose over another.</i></p> <p><i>Issues identified are capable of resolution with dispersed pattern of development able to link with existing and imminent infrastructure improvements</i></p> <p><i>The presence of the designated battleground does not sterilise the scope for development in the vicinity of Winwick. The designation</i></p>

	<p>and junction 9 of M62. Impact of the character of Winwick and a designated battle ground</p> <ul style="list-style-type: none"> • Eastward extension would have ecological impact and sterilise mineral reserves. 	<p><i>should be considered on a par with designated ancient monuments, conservation areas and listed buildings which have not been considered a barrier to development elsewhere in the Borough.</i></p> <p><i>Impact on the motorway and major arterial routes is managed with proposed development elsewhere. The Plan provides limited explanation of the basis for this conclusion and the extent of mitigation needed to enable development to take. It would appear that there is an inconsistency of approach.</i></p> <p><i>The HRA recognises that development proposed will have potential unacceptable impact on ecologically significant areas as a result of issues of air quality. There would remain scope for more modest development without encroachment into designated areas.</i></p> <p><i>The assessment takes no account of the potential balancing factors which might support development in these locations including proximity to existing employment areas; access to improving infrastructure, including West Warrington Railway Station; proximity and impact on most deprived wards in the Borough.</i></p> <p><i>This analysis is poor and incomplete.</i></p>
<p>3.3.28 (p27)</p>	<p>The Western Link road will connect the A56 to A57 and contribute to addressing congestion in Warrington. It enables development of the</p>	<p><i>It is not clear as to how the Western Link resolves existing problems of congestion. The route will divert some traffic travelling from South Warrington to Omega around the edge of the town centre,</i></p>

	<p>Waterfront and the SWUE and development within the town centre.</p>	<p><i>but it will not serve to improve access to the town centre.</i></p> <p><i>The route will deposit traffic onto the A56 in Walton and the A57 in Sankey onto already congested parts of the network.</i></p> <p><i>The route would serve no obvious purpose to serve traffic generated by the proposed Garden Suburb.</i></p> <p><i>The business case for the route relies heavily on the scope to access land on Warrington Waterfront and Port Warrington for development. It is considered questionable whether the route can serve the dual purpose of serving the traffic generated by the new development and relieve existing congestion at the same time.</i></p> <p><i>The focus of access to the development areas is clearly road based, contradicting the expectation that Port Warrington would be based on water and rail</i></p>
<p>3.3.29(p27)</p>	<p>Phase 1 of a Garden Suburb strategic link connecting the A49 to the A50 is prerequisite for additional development.</p>	<p><i>It is welcomed that there is recognition of the need for this route prior to development taking place.</i></p> <p><i>The detailed purpose and function of the route is unclear. It would seem to have scope to function as an alternative route for HGV traffic to reach the Garden Suburb from junction 10 of the M56 and potentially a route to avoid junction 9/20 of the M56/M6 at times of</i></p>

		<p><i>congestion at that junction.</i></p> <p><i>Whilst it has been suggested that the route of the strategic link included in the Garden Suburb master plan is for illustrative purposes, it is stated that the road links the A49 to the A50.</i></p> <p><i>It must therefore result in a new junction which can only logically be placed between J10 M56 and the cat & Lion junction in Stretton. This area is already heavily trafficked and a major junction serving large scale development to the east would add to existing queuing and levels of congestion back to junction 10. There is no clarity as to how this element of the Plan has been assessed.</i></p>
3.3.30(p27)	A stepped trajectory is required to the Western Link and Garden Suburb link to enable development to come forward	<p><i>This is welcomed but raises question over the ability to fund and deliver infrastructure prior to development taking place, where funding is dependent on developer contributions to a large extent. The ability to commit to infrastructure delivery of the scale proposed, in advance of development is question</i></p>
Exceptional Circumstances – 3.4.7 – 3.4.10	<ul style="list-style-type: none"> • Meeting Warrington’s development needs • Creating new sustainable communities which support infrastructure delivery • Parallel with development of brown field • Garden suburb provides comprehensive 	<p><i>It is questioned whether the exceptional circumstances presented are sufficient to justify the scale and extent of Green Belt release.</i></p> <p><i>The scale of Warrington’s development needs is overstated. Adjustment of the plan to cover the usually expected 15 year period would afford greater scope to manage opportunities which may</i></p>

	<p>and sustainable approach to meeting development need</p> <ul style="list-style-type: none"> • SWUE new sustainable community facilitated by the Western Link 	<p><i>arise during the plan period to develop on brown field sites.</i></p> <p><i>The plan suggests a level of urban capacity which could accommodate development needs over that period with more modest release of Green Belt.</i></p> <p><i>Employment land is locate in the Green Belt with sole purpose of exploiting Warrington’s location on the motorway network; because the sites are already in the control of developers and because of the commercial advantages of expanding existing operations in the area.</i></p> <p><i>This same justification could be applied to any part of the Green Belt adjacent to a motorway junction</i></p> <p><i>The new communities are not sustainable. They perpetuate travel focus on the private and fail to deliver any clear economic, social or environmental benefit.</i></p> <p><i>It is development which facilitates the infrastructure not the reverse. The scale of development proposed is only justified on the basis that it delivers a level of developer return so as to supporting funding of additional infrastructure.</i></p>
<p>Failing to meet development needs – 3.4.11 –</p>	<p>Options to reduce development needs will reduce ability to plan for growth and</p>	<p><i>The Plan should not blindly aspire to accommodating growth at any cost. The Plan should support the appropriate control of growth so</i></p>

<p>3.4.</p>	<p>comprehensive infrastructure delivery.</p> <p>Increased inward commuting to work, leading to increased congestion</p> <p>Lack of affordable housing</p> <p>Undermines Warrington’s role as a key driver of the North West economy</p>	<p><i>as to secure “the right development in the right place”</i></p> <p><i>The Plan does not solve the issue of current congestion and potentially makes it worse adding traffic to different points on the network.</i></p> <p><i>Travel to work patterns in Warrington are complex. It is unclear as to how the failure to meet development needs results in increased inward commuting.</i></p> <p><i>Affordable housing provision should be planned and considered in terms of location, travel to work patterns a wider employment opportunities. The proposed Urban Extension and Garden Suburb do not provide an appropriate solution in this regard.</i></p> <p><i>Warrington will retain its role given its strategic location on the highway network. In other respects drivers will change as wider, regional drivers come into effect. Activity within the adjoining city regions will influence Warrington’s role in the NW to a greater extent the proposals of the Submission Draft.</i></p>
<p>DEV1 (3)</p>	<p>Garden suburb – min 6490 homes with 4201 in plan period plus 930 with consent</p> <p>SWUE min 1631 homes within plan period</p>	<p><i>See comment on MD2 and MD3 below</i></p>

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DEV1 (5) Housing trajectory	2017-2021 847 dpa 2011-2037 978 dpa	<i>See comment in Housing Section above</i>
4.1.13 Urban Capacity	Significant levels of town centre regeneration leading to additional housing capacity.	<i>See comment in Housing Section above</i>
Housing distribution and trajectory	Confirms that the Council can deliver the overall housing requirement for the Borough against the stepped housing trajectory	<i>See comment in Housing Section above</i>
Supply beyond the plan period – 4.1.28	Master planning identifies an illustrative capacity of 1800 dwellings within the urban area – with likely additional capacity coming forward beyond the plan period – Fiddlers Ferry	<i>See comment in Housing Section above</i>
DEV2 – Meeting Housing Needs	Affordable housing of 20% or 30% depending on location unless viability appraisal demonstrates otherwise.	<i>See comment in Housing Section above</i>
DEV2 – Housing Type and Tenure	Mix should be informed by housing mix monitoring target.	<i>See comment in Housing Section above</i>

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DEV2 – Housing for older people	20% of development to accommodate needs of older people determined on a site by site basis.	<i>There is a lack of clarity as to how this might be delivered</i>
DEV3 – Gypsy and Travelling Show person provision	Adequate provision of sites against GTAA	<i>Impact of recent approvals relative to need</i>
DEV4 – Economic Growth and Development	Minimum of 362 ha for B1, B2 and B8 uses	<i>See section on economic growth</i>
DEV4	<p>116 ha of employment in Garden Suburb.</p> <p>In other locations development should be away from areas sensitive to heavy vehicle movement; with direct access to the primary route network; and with access to rail or the Manchester Ship Canal</p>	<p><i>The development of a logistics based employment use in the Garden Suburb is poorly considered.</i></p> <p><i>As with other development involving freight movement development which fails to provide scope for access to rail or water should be resisted.</i></p> <p><i>The development is in the wrong place. It will increase inward commuting into the Borough and will be difficult to assimilate with the form of housing proposed in the Garden Suburb irrespective of attempts to deliver affordability.</i></p>
4.2.6	Recognising special locational needs	

4.2.12	Assessing future employment land requirements	
DEV5 and 4.3.4	Retail and leisure needs	<p><i>Although titled retail and leisure policy DEV5 makes reference to service provision through a hierarchy of centres including neighbourhood hubs.</i></p> <p><i>The Council consistently places emphasis on service provision through the establishment of neighbourhood hubs at Woolston, Orford Park and Gt Sankey. No such provision is highlighted for South Warrington</i></p>
GB1 Green Belt	<p>Land removed from the Green Belt</p> <ul style="list-style-type: none"> • Garden Suburb • SWUE • Land at Lymm <p>Inset settlements Lymm</p> <ul style="list-style-type: none"> • Lymm • Oughtrington <p>Green Belt Settlements</p> <ul style="list-style-type: none"> • Broomedge • Grappenhall Village • Hatton 	<p><i>Confused detail over boundary of Grappenhall Village as a Green Belt Settlement. Plan at Figure 6 is inaccurate and confusing.</i></p> <p><i>Grappenhall Village is noted as a Green Belt settlement but appears to be separated from the Green Belt by proposed development</i></p>

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	<ul style="list-style-type: none"> • Heatley • Stretton • Weaste Lane 	
5.1.7	Capacity in adjoining areas	
5.1.9	Development needs <u>and</u> aspirations	
5.1.12	Green Belt Assessment – has informed spatial strategy	<i>Green Belt Assessment sets out from a premise of the need to accommodate development?</i>
Ensuring Green Belt Boundaries Endure Beyond the Plan Period	Avoid need for further alteration	<p><i>Release is justified on the basis of unattainable levels of growth</i></p> <p><i>Makes potentially unnecessary provision beyond the plan period which itself exceeds the requirements of the Framework.</i></p> <p><i>Still within the period covered by the 2014 Core Strategy Local Plan which did not identify need for Green Belt release</i></p>
Defining inset and washed over settlements		<i>See comment on GB1 above</i>
5.1.18		
TC1	<p>Widening the role of the Town Centre</p> <p>Promotion of the town centre for office</p>	<i>Disconnect with key areas of growth with town centre contradicts ambitions to strengthen viability and vitality.</i>

	<p>development</p> <p>Relies on transformation of Bank Quay railway station</p>	<p><i>No indication of how jobs growth – higher value jobs will be created</i></p> <p><i>Query likelihood HS2 and Northern Powerhouse rail connecting in Warrington Town Centre.</i></p> <p><i>The plan misses the opportunity to explore relocation of the outdated Warrington Hospital on to a site within the town centre connected with accessible transport facilities and the means of releasing the existing site to residential development.</i></p> <p><i>Misplaced ambition over sites such as the stadium quarter and the failure to note the potential for redevelopment of the site of New Town House are demonstrative of the muddled thinking of the Plan.</i></p> <p><i>Plans for retail in the town centre seek to buck the trend for High Street development. The inaccessibility of the town centre from the areas of south Warrington which are the subject of development proposals and the focus on employment land for logistics functions do not support town centre regeneration.</i></p>
INF1	Sustainable travel	<i>See comments on Infrastructure above</i>
INF2	<p>Transport safeguarding</p> <p>A new or replacement high level crossing of the Manchester Ship Canal between Stockton Heath</p>	<i>The ability of south Warrington to accommodate the level of development proposed without significant improvement to the local highway network is accepted.</i>

	<p>and Latchford.</p> <p>Western Link Road</p>	<p><i>A new crossing of the Manchester Ship Canal might serve this purpose.</i></p> <p><i>The safeguarding is limited to the immediate approach and the bridge itself but makes no provision of wider improvement merely linking to already congested and problematic parts of the network.</i></p> <p><i>Previous safeguarding, particularly that associated with the New Town Master plan, recognised that the crossing would need major additional infrastructure to be effective.</i></p> <p><i>The safeguarding tabled is ineffective and meaningless.</i></p> <p><i>The Western Link Road is presented as a route serving the additional development proposed in South Warrington and to relieve town centre congestion.</i></p> <p><i>Policy recognises and quotes national guidance in terms of the Western Link principally relating to access to development land within the Warrington Waterfront and Port Warrington – not to these other objectives.</i></p>
<p>INF3</p>	<p>Utilities and Telecommunications</p> <p>Proposed growth will require an increase in waste water treatment capacity. Discussion has</p>	<p><i>It is not clear as to the nature and extent of development required to facilitate such improvements and the associated works required.</i></p> <p><i>Improvement to the Bell House Farm Sewage Works in Walton will</i></p>

	<p>not revealed the need to identify new sites for waste water treatment but there is likely to be a need to increase the capacity of existing treatment facilities in the South of the Borough</p>	<p><i>require development in the narrow wedge of Green Belt between Walton and Moore.</i></p> <p><i>The plan makes no reference to water supply which has been an issue in Warrington historically delaying progress with development.</i></p> <p><i>In the context of climate change and the scale of development proposed in neighbouring conurbations there should be certainty as to how a concentration of development in South Warrington can be accommodated as per the expectation of the NPPF</i></p>
<p>INF4</p>	<p>Community facilities</p> <p>The Council will seek to promote health and wellbeing and reduce health inequalities, by supporting the development of new, or the co-location of existing education, health, social, cultural and community facilities – where possible in defined centres and neighbourhood hubs</p> <p>New Hospital Site</p>	<p><i>The proposed Garden Suburb is the largest single residential development site outside historic New Town proposals, yet it alludes to the delivery of community facilities rather than establishing a clear and coherent policy for the delivery of such accommodations. There is a considerable risk in the absence of such a policy that development will occur without the essential and necessary facilities being in place.</i></p> <p><i>Given the scale of development and the increase of population inherent in the plans, vague reference to the possibility of a new hospital is inadequate. Plans should provide for a more certain and clear approach led by the Council and Warrington &Co. This is especially so as the existing hospital site represents a major redevelopment opportunity within the urban area which would</i></p>

		<p><i>support a range of objectives relating to the regeneration of the town.</i></p> <p><i>This is an excellent example of side stepping consideration of difficult options and a tendency to revert to the less challenging approach of development of green field Green Belt sites.</i></p> <p><i>Whilst providing for the general provision of a neighbourhood centre in the Garden Suburb there is no clarity as to how a neighbourhood hub might in reality be delivered.</i></p>
<p>INF5</p>	<p>Delivering Infrastructure</p>	<p><i>There are inherent weaknesses in the approach taken to secure the delivery of infrastructure. One of the principles behind the large scale allocations of SWUE and the Garden Suburb is the ability of larger schemes to deliver larger scale infrastructure requirements.</i></p> <p><i>It is unclear from INF5 how planning obligations will provide a tool adequate to deliver funding for the infrastructure required. The plan needs to be more explicit in approach and contain appropriate mechanisms to ensure that piecemeal development of allocations does not circumvent the necessary contributions to infrastructure provision.</i></p> <p><i>The absence of a CIL charging mechanism, prepared as an integral</i></p>

		<p><i>part of the development plan is a weakness.</i></p> <p><i>It is considered that there is considerable scope for challenge of costings within the IDP. Under estimation of costs will result in an inability to secure funds for provision and delivery of infrastructure</i></p> <p><i>The PDO and related viability appraisal attracted criticism in terms of the over valuation of development. Value in development is critical to the ability to secure sufficient resource to the extensive list of physical and social infrastructure required to support the development and to achieve the wider benefits expected by the Council.</i></p> <p><i>If high levels of viability are to be secured the form, character and tenure of housing provision is likely to be affected.</i></p>
DC2	Historic Environment	<p><i>The proposals conflict with the concept of protection of the towns historic environment and heritage assets. The proposed allocations give rise to conflict with the character and appearance of a number of conservation areas and other designated heritage assets.</i></p>
DC6	Quality of Place	<p><i>The designation of large scale development in south Warrington runs counter to the aspirations of this policy. The absence of Master plans is indicative of a failure to understand the context in which the developments would be delivered.</i></p>

<p>ENV8</p>	<p>Environmental and Amenity Protection</p>	<p><i>Air Quality –provision is made within ENV8 to resist development which has adverse impact on air quality, but in proposing the development contained within the plan the Council is effectively saying that changes in vehicle emissions mean that this does not matter.</i></p> <p><i>In order to protect the Manchester Mosses Special Area of Conservation this policy seeks to manage development which produces more than 200 HGV movements per day on the M62 – questions the allocation of a large logistics site close to this part of the motorway network.</i></p> <p><i>The allocations in South Warrington place new residential development in close proximity to the AQMAs following the motorway network.</i></p> <p><i>The policy seeks to resist development near too busy roads or noisy businesses. The allocated sites in South Warrington are commonly adjacent to the main arterial routes crossing the Borough including motorways. The SWUE is located adjacent to existing and proposed industrial premises with part of the site located with a zone of protection for a hazardous installation. The key access route to the proposed Warrington Waterfront and Port Warrington would be via the A56 through Walton.</i></p>
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		<p><i>Parts of the Garden Suburb abut existing and proposed areas of employment use and the highway network which accesses these sites. The design of the Garden Suburb strategic link indicates that it would take HGV's from Barleycastle to the A49 across an allocated residential area.</i></p> <p><i>The objectives of policy ENV8 would seem to be contradicted by the development plan allocations.</i></p>
MD1	Warrington Waterfront	<p><i>The principle of expanding the urban area in this location is supported.</i></p> <p><i>The development is wholly dependent on the Western Link and policy understandably reflects this position.</i></p> <p><i>The Parish Council objects to this allocation on the basis of inadequate consideration of the impact of the Western Link and the additional traffic which will use it.</i></p> <p><i>As noted elsewhere, it is contended that the Link Road will not resolve existing congestion but will simply move the point of congestion to different locations.</i></p> <p><i>The Link Road will serve the SWUE, Port Warrington and Warrington Water Front allocations. It is a single carriageway Road with new traffic light controlled junctions at least three locations in Walton.</i></p>

		<p><i>Congestion and excessive queuing at these junctions is inevitable.</i></p> <p><i>Concern is noted above in respect of traffic impact on air quality.</i></p> <p><i>Concern is expressed in comments on infrastructure delivery above, as to the ability to secure all the necessary infrastructure to serve the development in a timely and coordinated fashion, not least because of issues over funding.</i></p> <p><i>The connection of Port Warrington the rail network is critical to prevent unacceptable levels of HGV traffic using the site. The previous allocation of the site and the grant of planning permission for the rail connection has not delivered the development or the rail link. The Submission Draft does not make any reference as to why this is so. Delivery of the allocation relies on funding decisions outside the Council's control with Network Rail. There is not clarity as to any priority afforded to this scheme.</i></p> <p><i>There is no clarity as to the rationale behind Port Warrington. What is the necessity to unload goods at a berth in Warrington when there are existing rail connected berths downstream.</i></p> <p><i>There is concern that the berth at Port Warrington would require vessels to pass through the swing Bridges and Latchford Locks in order to turn. The Ship Canal has no turning facility between Runcorn and Irlam. Additional openings of the swing bridges would</i></p>
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		<p><i>exacerbate concerns over congestion.</i></p> <p><i>The Parish Council shares the concerns of Halton Borough Council and Moore Parish Council in terms of the impact of Green Belt release needed to accommodate the Warrington Waterfront development.</i></p> <p><i>Concern is similarly shared over the impact of the allocation on Moore Nature Reserve.</i></p>
MD2	Garden Suburb	<p><i>Appleton Thorn will lose its distinct identity.</i></p> <p><i>There are no details of the extent and form of the key elements of infrastructure including the rationale behind gypsy and traveller accommodation and community waste recycling provision.</i></p> <p><i>The development plan framework should be tabled as part of the Local Plan not as a separate development plan document.</i></p> <p><i>There is no clarity as to how developer contributions (as at point 11) can be secured in a manner consistent with the NPPF or other policies of the Plan.</i></p> <p><i>There is no indication as to the speed of delivery of the Homes England permitted sites and therefore the time frame for the provision of infrastructure outlined at point 14. It would seem likely</i></p>

		<p><i>that the dependence of the Garden Suburb to bring forward development in the early to mid stages of the plan period may be inconsistent with the ability to ensure funding and consider programming.</i></p> <p><i>The considerable dependence of developer contributions adds complication as the timing of contributions will usually be phased post approval and staged as development progresses. There is likely to be an inherent time lag in the delivery of infrastructure alongside the delivery of development.</i></p> <p><i>The employment development in the Garden Suburb needs to be considered as a whole not piecemeal in order to meet the requirements of point 15.</i></p> <p><i>The policy should require delivery, not just programming before stages of the development can proceed.</i></p> <p><i>The provision of a residential care facility is welcomed but how is this to be provided.</i></p> <p><i>There is no indication as to the means by which new community facilities can be delivered and service provision secured and funded.</i></p> <p><i>There is no indication as to how the new Country Park would be delivered and funded in the long term. The Council is known to</i></p>
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		<p><i>struggle to fund existing facilities such as Walton Hall. Allocation without such consideration fails to grasp the long term viability of the content of the Plan and reinforces the concern that the plan is based on an urban design exercise rather than a considered and deliverable development plan.</i></p> <p><i>In considering employment development the Council is already contradicting key elements of the Submission Draft including measures to control impact on the natural environment.</i></p> <p><i>What does the requirement for development to respect the Green Belt boundary mean? (point 54)</i></p> <p><i>The proposal will change the character and appearance of the conservation areas. The Victoria Road/York Drive CA loses its relationship with the open rural setting on the south side of the Bridgewater Canal.</i></p> <p><i>Grappenhall Village CA is surrounded by open countryside lost as result of the development. The role of Grappenhall Hall is unclear and the space between the Bridgewater Canal and the village edge is removed from the Green Belt. Although described as washed over the Village appears to be separated from any area of Green Belt. The Plan is convoluted and confusing having regard to the protection of this valuable heritage asset.</i></p>
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<p>MD3</p>	<p>South West Urban Extension</p>	<p><i>Policy should specify the scale of development. "Around" 1600 is meaningless. Either a precise number or a clear range is required.</i></p> <p><i>There is no indication as to how the required tenure mix or the proposed nursing/care home can be delivered.</i></p> <p><i>What is a comprehensive package of transport measures?</i></p> <p><i>What does a contribution towards the Western Link mean?</i></p> <p><i>No development will be permitted until funding for Western Link is certain, but 30% of funding is supported by returns from the development.</i></p> <p><i>What status will the master plan take? When will it come forward?</i></p> <p><i>Requirement for 30% affordable – has this been factored into the any viability assessment to ensure that infrastructure and other requirements funded through developer contributions stack up?</i></p> <p><i>It is unclear as to the extent to which the Council has taken the presence of a COMAH protection zone into the allocation of the wider area for development. No reference is made to the Planning Practice Guidance – "Hazardous Substances"</i></p> <p><i>There is limited reference to the impact of various COMAH zones relating to industrial premises close to the allocated site or to the</i></p>
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		<p><i>various gas pipelines which run across the site and ethylene pipelines which run adjacent to it. Initial appraisal by AECOM suggested that density of development on the site may be restricted to meet HSE requirements. It is known that HSE have objected to open space/recreational uses in Warrington close to pipelines and other hazardous installations. The Submission Draft is unclear as to the significance of such matters.</i></p> <p><i>Irrespective of health and safety issues, the proposed housing development of the site "benefits" from its borders being defined by the West Coast Mainline, The Manchester Ship Canal, the proposed Western Link, the A56 and a sewage works which will need upgrading to meet the demand from increased development in South Warrington. The ability to secure an attractive, high standard of development in such a location is questionable.</i></p> <p><i>No consideration has been given to the increase in the number of receptors and the consequent generation of complaint about noise, odour, air quality and light pollution from established business. This is contrary to the provisions of NPPF Para 186, which expects consideration of potential threat to established business from new development.</i></p> <p><i>Suggestion of an average minimum density of 30 dph would appear to contradict advice provided in previous assessment of the urban</i></p>
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		<p><i>extension by AECOM.</i></p> <p><i>Developers would be required to ensure financial contribution for the delivery of a new primary school and places at secondary schools. Phasing of the delivery of school places and new development should be clarified. It should be noted that there is currently no sixth form provision in South Warrington, until provision was potentially made within new high school provision in the proposed Garden Suburb. The sustainability of development in the urban extension should be questioned until there is clarity over such provision.</i></p> <p><i>The delivery of a health facility within the development is outside the LPA's scope. There is no consideration of the means of delivery beyond physical infrastructure.</i></p> <p><i>There should be clarity over HSE acceptance of public open space located in COMAH exclusion zones. The HSE have objected to use of areas of land so zoned where gathering of people needs to be considered in the context of the extent of risk from the source of the hazard. It is difficult to see that this exercise has been completed in this instance.</i></p> <p><i>Policies relating to the natural environment are statements not policy. There is no clarity in their goals or objectives and no clear</i></p>
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		<p><i>method of delivery.</i></p> <p><i>Commentary on Green Belt section above highlights concern over Green Belt assessment, acceptance that high value Green Belt should be released and that fundamental purposes of the Green Belt are ignored.</i></p> <p><i>The paucity of transport infrastructure provision is described at length above. As with other policies the approach to transportation relating to the Urban Extension consists of statement of intent, but no substantive policy to demonstrate that the development could be delivered in a sustainable manner. The proposed plan for the Western Link shows no alteration to the A56 south of the proposed junction with the new road and no indication of improvement to routes through Stockton Heath needed to reach, employment, education and other facilities.</i></p> <p><i>The South West Urban Extension Heritage Impact Assessment is presented as being consistent with Historic England Guidance and best practice. It is not however signed and there is no clarification as to the author's qualification in presenting the document</i></p> <p><i>The assessment makes no reference to the proposed Western Link, an inherent part of the scheme, with direct impact on a number of the heritage assets noted – particularly Walnut Tree Farm.</i></p>
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		<p><i>The assessment fails to recognise the interrelationship between landscape and heritage. The Conservation Area and individual heritage assets are components which contribute to the historic and architectural quality of the location.</i></p> <p><i>Large scale development, dramatically changing the scale and population of the area surrounding Walton Village, will change the character and ambience of the setting for the conservation area and the related listed buildings.</i></p>

17 Conclusions

17.1 It is the contention of the Parish Council that the Submission Draft Local Plan is not sound and fails to meet the expectations of paragraph 16 of the NPPF.

17.2 The Plan has not been positively prepared; is not appropriately justified; is not effective or deliverable and shows inconsistencies with national policy.

17.3 The plan is not sound and should not proceed to adoption in its present form.

17.4 This conclusion is reached on the premise that:

- There is no justification for predicted levels of growth which are central the spatial expression of the plan
- There is sound or logical connection between aspirational growth and the spatial plan.
- There is consequently no justified need for the level of housing or employment development anticipated by the plan.
- There is no need for the scale of Green Belt release.
- There is no rational consideration of the existing levels of congestion or the impact of development on that congestion.
- Proposed infrastructure does not deal with existing pressures or issues of congestion and cannot therefore accommodate the additional demands of the proposed development.
- There is no need for development which will result in an unacceptable level of harm to air quality and the environment
- There is no need for development which will destroy the character and distinctiveness of Warrington and its constituent settlements.

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- The proposals are not sustainable and run counter to national policy.
- There is no clarity or certainty of the means of delivery of the planned proposals. Funding methodologies are flawed and unreliable and based on the unreliable returns expected from growth and development.

17.5 The Plan is not sound. It should be reassessed and modified prior to submission to the Secretary of State for examination.

17.6 The risk of not taking this approach has to be considered in terms the rejection of the plan as unsound at examination, and the period of time from that conclusion of the Secretary of State to the production of a further Submission Draft. This is a far greater risk than reviewing the plan now and producing a revision which addresses the reasons for its current lack of soundness.