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Sent via email to: localplan@warrington.gov.uk

10<sup>th</sup> November 2020

Dear Sir,

**CONSULTATION ON WARRINGTON LOCAL PLAN - UPDATED PROPOSED SUBMISSION VERSION LOCAL PLAN 2021-2038 - SEPTEMBER 2021 ("UPSVL") – REPRESENTATIONS ON BEHALF OF SIMON GLEAVE AND SLAB PENSION FUND** [REDACTED]

We write on behalf of Simon Gleave and Slab Pension Fund of [REDACTED] [REDACTED] ("representors") to make representations on their behalf in connection with the Warrington Local Plan – Updated proposed Submission Version Local Plan 2021 – 2038 – September 2021 ("UPSVL").

The representors own and operate land directly north east of Junction 9 of M62 with A49 at Winwick. The land, two parcels, is in use for a car boot sales operation (larger parcel) and as a social club with ancillary car park (smaller parcel). The land in question is identified on the plan at Appendix 1 of this letter.

The representors have previously engaged in call for sites exercises and made representations in connection with earlier stages of the emerging Warrington Local Plan. These historic representations, which were made by DPP on behalf of the representors (still John Francis), are to be read and considered alongside the representations set out in this letter.

To assist in the Council's consideration of the representations, when setting out comments and related representations we identify the page number (actual local plan rather than the version that secured Council approval), paragraph number and policy of the UPSVL that they relate to.

## Representations

The representor's representations are as follows:

### Satisfying Relevant Tests

The National Planning Policy Framework ("NPPF") deals with plan-making at Section 3. It confirms at paragraph 15 that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Paragraph 16 of NPPF confirms that plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development.
- b) Be prepared positively, in a way that is aspirational but deliverable.
- c) Be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.
- d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation.
- f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Regarding the subject of maintaining effective cooperation and liaising with adjoining local planning authorities, covered at paragraph 24 of NPPF, local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

The reason for this is so that strategic policy-making authorities can collaborate to identify relevant and pressing strategic matters which they need to address through their plans. They should also engage with their local communities and relevant bodies.

Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. Indeed, joint working can identify opportunities for some authorities, which might for example be less constrained than a neighbouring authority, to take some of the development it needs to plan for and can also help determine where additional infrastructure is necessary.

Having briefly reviewed relevant supporting documents and related evidence base, we question whether the Council has satisfied the NPPF requirement for it to properly liaise with neighbouring authorities when drawing up the local plan; in essence that it has failed to meet the NPPF Duty to Cooperate requirement.

Relevant documents in this instance mainly involve the council's updated draft Statement of Common Ground dated September 2021. It is this representor's position that the council cannot demonstrate that there was effective liaison and working arrangements between itself and other strategic policy-

making authorities adjoining Warrington. This representor is particularly concerned about the lack of working arrangements with the local planning authority roughly to the north and north west of Warrington, St Helens Council, by reference to its sites detailed earlier. This is contrary to the liaison that took place with the authority to the south east, Halton, but perhaps this was because the Council needed to secure support for the new allocation at Fiddlers Ferry, upon which a great deal of emphasis is being placed in development delivery terms.

The implication of this is that it is the representor's position that the Council has not positively prepared the new draft local plan, UPSVLP, and as such it cannot fully justify its development strategy.

Specifically, it is the representor's position that the UPSVLP and its evidence base does not detail the steps the council took to liaise with St Helens Council properly and effectively – we have focused on this authority as this is the nearest authority to the representor's land at Winwick.

The evidence base does not detail the production or carrying out of research to justify its approach to dealing with the land and settlements in Warrington Borough that are north, north west of the main conurbation of Warrington, close to the boundary with St Helens.

This is linked to large allocations planned immediately over the boundary, including a major urban extension project at Bold, all of which we would say has skewed how the new version of the Warrington plan, the UPSVLP, deals with the development needs of settlements and need for allocations for development in this part of the Borough.

There is, for example, no planning justification whatsoever for the previously planned allocation at Burtonwood, as proposed through the Proposed Submission Version Local Plan (2019 ("2019 version of the local plan)) being dropped. linked to this, one has to question why, in a similar vein, sites like the representor's sites north east of Junction 9 of M62 with A49 at Winwick have not been better considered for development, or allocated, given the benefits development there would bring the Borough in sustainable development terms.

In light of the points made above one has to question whether the requirement of NPPF that the council cooperates and liaises with neighbouring authorities (Duty to Cooperate) has been satisfied. This needs to be investigated through the Examination process.

#### Introduction (page 3+; paragraph 1.2.5+)

Consideration of the UPSVLP (from paragraph 1.2.5+) confirms that, having undertaken a comprehensive review of the previous version of the local plan, i.e., the 2019 version of the local plan, the Council has published a new version of the emerging local plan. One has to assume that, for whatever reason, although this is not apparent from the new plan or its evidence base, the Council regarded the 2019 version of the local plan to be deficient. We are very surprised at this. To us the 2019 version of the local plan appears more sound and capable of satisfying relevant tests than the UPSVLP.

The key changes between the 2019 version and the UPSVLP include:

- Reduction of the Plan's housing requirement.
- Allocation of the Fiddlers Ferry site for employment and housing, following closure of the power station in March 2020.

- Removal of some of the previous Green Belt allocation sites, including Port Warrington and the Business Hub, the South West Urban Extension, the Phipps Lane site in Burtonwood and the Massey Brook Lane site in Lymm.
- Reduction in size of the South East Warrington Urban Extension (previously known as the Garden Suburb).

Accordingly, a key point we would make at the outset of these representations is to set out surprise that the 2019 version of the local plan was dropped. Furthermore, that the plan published in 2019, which was at the time regarded as legally prepared and sound and satisfying other relevant tests (linked to points already made on Duty to Cooperate), differs so significantly from the current version published for comment in September 2021, the UPSVLP. This later version of the plan is also regarded by the Council as legally prepared and sound. One has to question whether two versions of the same local plan given they are so different can both be regarded as satisfying all relevant tests. It is our instinct, based on a review of the UPSVLP and its evidence base, that of the two versions of the local plan only the 2019 version could possibly be regarded as being sound etc.

Our position on this is, inter alia, based on the premise that back in 2019, based on the 2019 version of the local plan and its evidence base, the Council concluded that a specified amount of land was needed to be removed from the Green Belt so as to accommodate necessary growth. This was growth in residential and employment. The plan and its evidence base very carefully and specifically confirmed that this was the minimum amount that would be required to meet stated growth aspirations and meet policy targets. However, the amount in question was substantially greater than the amount currently being proposed through the UPSVLP.

Currently, under the UPSVLP, some 580 hectares is proposed to be removed from Green Belt which equates to 4% of the total amount of Green Belt land in the Borough. In the 2019 version of the local plan some 1,210 hectares was proposed to be removed from the Green Belt which equated to 11% of the total amount of Green Belt in the Borough.

A key representation we would make is to question how can a plan prepared in 2019 that proposed to de-allocate some 11% of existing Green Belt land so as to deliver required growth levels, and which was regarded as sound and satisfying other relevant tests, be superseded by a new plan prepared in 2021, which is also said to be sound, but which halves the amount of land proposed to be removed from Green Belt so as to deliver necessary amounts of new development.

We have no confidence in the new UPSVLP and its evidence base. We are of the view the UPSVLP is designed to fail. We do not accept that the plan's residential and employment land requirements are veracious nor sufficient to deliver the necessary levels of growth required to support a sustainable and successful Warrington and its Borough. The levels of growth planned for through the 2019 version of the local plan, and how growth was proposed to be delivered, was much closer to what the Borough needs and should be planned for through the UPSVLP.

In our view, the UPSVLP cannot be justified, doesn't satisfy relevant tests, including duty to cooperate and soundness, and all aspects of the plan should be rigorously examined through the Examination process.

[Justification for New Approach and UPSVLP \(page 5; paragraph 1.2.9\)](#)

It is claimed that work on the need for a new plan, which has delivered the UPSVLP, commenced following confirmation of changes to the Government's housing methodology at the end of 2020. The Council has suggested that it updated its evidence base to re-establish Warrington's future development needs and subsequently re-assessed the Plan's spatial strategy and potential allocation sites.

It is further claimed that having undertaken this work and considered in detail the key issues raised from the previous consultation, the Council is justified in proposing a number of significant changes from the previous 2019 version of the local plan. These changes include:

- A reduction of the Plan's housing requirement.
- The allocation of the Fiddlers Ferry site for employment and housing, following closure of the power station in March 2020.
- The removal of some of the previous Green Belt allocation sites, including Port Warrington and the Business Hub, the South West Urban Extension, the Phipps Lane site in Burtonwood and the Massey Brook Lane site in Lymm.
- The reduction in size of the South East Warrington Urban Extension (previously known as the Garden Suburb).

We comment later in more detail on the benefits, or disbenefits, of a development strategy that is underpinned by the sites, or loss of them, as set out above, but would say now that we have concerns about the significant redirection of the local plan development strategy. Indeed, any development strategy that involves such a sea change from its predecessor, which at the time was regarded as the right way forward and sound, has to be questioned.

As already confirmed, the amount of land now proposed to be removed from the Green Belt is 4% of the total amount of Green Belt land in the Borough. 11% was previously regarded as necessary.

We would say that 4%, by reference to the amount of and broad location of Green Belt in the Borough, is too little, and that the amount proposed to be removed under the previous version of the emerging local plan, back in 2019, which was 11%, was a truer reflection of the natural growth needs of the Borough.

While the Council appears to want to justify the need for the new local plan, UPSVLP, by reference to Government housing methodology introduced at the end of 2020, and other factors, one key factor of influence is not stated in the UPSVLP but should be. This is the effect of local politics. And through this the much less ambitious and non-planning policy justified approach to delivering growth which also has, as an effect, the need to remove less land from Green Belt. As such it is our view that the key drivers for the UPSVLP are not planning policy justified rather required by local politics.

#### Warrington within the Region (page 10; paragraph 2.1.16+)

The UPSVLP confirms that Warrington lies at the hub of the region's communications network. The M6, M56 and M62 motorways intersect within the Borough, providing good access to all parts of the region and beyond. Warrington also lies on the region's main North-South (West Coast Main Line) and East-West (Trans-Pennine) rail routes. The Borough is also traversed by the Manchester Ship Canal, an important commercial waterway linking the Port of Manchester with the Mersey.

All of the above is true and appropriate. However, no real mention is made of the fact that Warrington was historically seen to offer considerable potential for growth and for this reason was designated as a New Town. Because of this new infrastructure was introduced and the town and borough was set to be grown in a fully planned and coordinated way.

However, this appears to be underplayed by the current version of the local plan which promotes only low to moderate growth and in a very conservative way, thus ignoring the obvious and latent potential of Warrington and its periphery and satellite towns to be grown in a sustainable way.

A key representation therefore is that the plan should have but does not fully and properly exploit the development and growth potential of Warrington and its hinterland by reference to available infrastructure and historic plans for the town.

#### Challenges and Opportunities (page 17+; paragraph 2.2+)

According to the UPSVLP, the Borough of Warrington varies significantly in terms of character, prosperity, health and access to services and infrastructure. While only a minor point, we would say that the town of Warrington is well served. It is the Borough's smaller towns, Burtonwood and Winwick for example, that are less well served.

The challenges identified by and to be addressed by the UPSVLP are identified at paragraph 2.2.2. The key ones of these are as set out below with our comments on whether they are genuine issues and whether the UPSVLP's proposed approach to dealing with them will achieve the desired outcomes:

- Limited housing and employment land supply – Perversely this is directly linked to historic development plans applying in the Borough. In essence, the fact there are limited housing and employment development opportunities is as a direct consequence of the Council ignoring the potential of Warrington and other parts of the Borough through the foundations laid down by the former New Town Development Corporation. This can very easily be remedied through the UPSVLP by it setting an appropriate new housing and employment land requirement. However, this is not the case. In fact it is the opposite. The new plan turns its back on the 2019 version, which we would say sought to allocate an appropriate amount of new land for development, and instead plans only for low growth, and in a way that we would say is unlikely to deliver the envisaged levels of growth. In essence, the plan is planned for failure.
- Housing affordability concerns – This is possibly an issue but we would say can be remedied by an appropriate set of policies and related land allocations. These should perhaps include a policy that supports affordable only developments in Green Belt so as to encourage provision.
- Meeting the needs of an aging population – this is a national rather than a regional or local problem. The plan should consider this topic area carefully and also make provision for dedicated developments that cater for the aging population.
- Car dependency – This is a national problem which affects all settlements including the likes of Warrington. We would say that the plan needs to be more innovative and pioneering if this trend is to be arrested. That said the plan does not include transportation related proposals that might impact on this trend.
- Traffic congestion – Same points as made and set out above also apply here.

- Air quality impacts – This is directly linked to the two bullets immediately above. Clearly, the emerging plan needs to allocate land for development but perhaps the plan should be more innovative in terms of requiring .

At paragraph 2.2.3 UPSVLP talks about opportunities which Warrington offers. We agree with the majority of these but would again point out that they will not be delivered or realised if the plan under performs in terms of delivering necessary levels of growth which we say it won't as the plan's housing and employment land requirements are very low.

#### Vision (page 20, paragraph 3.1+)

The planned vision for the town of Warrington and Borough is noted. We question whether the points in paragraphs 2 and 3 can be delivered and should in fact form part of a vision by reference to the low level of growth that is planned for in terms of new housing and employment.

Indeed, how can such a low level of growth in new housing development support Warrington's economic growth?

Regarding the premise that new development will be successfully integrated into Warrington's transformed public transport system, the UPSVLP isn't in fact proposing a transformed transportation system. It merely promotes more of the same, building on Warrington's location at the crossroads of the M6 with M62 and M56 and the fact it is crossed north to south and east to west by main railway routes.

As to the suggestion that there will be a transformation in how Warrington meets its energy needs, with a focus on renewable sources and decentralised networks, this is a very reasonable target, but we would again question how this target will be delivered by reference to the actual plans and proposals of the UPSVLP.

#### Plan Objectives (page 23+, paragraph 3.2+)

It is not correct to suggest as is set out at paragraph 3.2.3 that plan Objectives have been refined during the process of Plan preparation, taking into account representations made during previous Local Plan consultations. It is our position that representation by many parties, certainly those from developers and landowners, have been ignored. This is because these generally supported higher growth levels than the previous version of the plan made provision for, yet the current version of the plan, the UPSVLP, drops these to an even lower position than envisaged by the previous 2019 local plan.

It is the representor's position that the UPSVLP will not as is claimed deliver the sustainable growth of Warrington. By planning for a minimum of 14,688 new homes (equating to 816 per year) between 2021 and 2038 will not deliver the correct and needed levels of growth nor will they be able to adequately support Warrington's economic sector and the proposed provision of 316.26 hectares of employment land between 2021 and 2038. The plan is planning for very low levels of growth not the higher level it previously suggested was necessary. Yet the reasons for this, by reference to the evidence base in support of the UPSVLP, are not fully justified.

Perversely, and argued so as to ensure that Warrington's revised Green Belt boundaries maintain permanent in the long term, the plan does not seek to remove enough land from Green Belt as is

necessary so as to ensure sustainable patterns of growth in the Borough and the necessary levels of growth. The fact land is needed to be taken out of Green Belt suggest that the boundary was drawn far too tightly when Green Belt was first designated. Indeed, many areas of Green Belt in the Borough in our view cannot be justified as they have no real role to play in the sense they are not stopping the coalescence of existing settlements or areas of development as the next settlement or area of development is some distance away. Other areas of Green Belt, like the representor's land, cannot be regarded as strategic and could, be taken out of Green Belt and reallocated for development without harming strategic objectives.

The objectives nevertheless confirm that some land needs to be released from the Green Belt. The plan goes onto say that the plan will ensure that development on former Green Belt land complements rather than competes with development within the existing urban area and that new infrastructure investment will benefit the Borough as a whole. The Objectives will also help to ensure that the revised Green Belt boundaries are able to endure over the long term, well beyond the end of the Plan period in 2038. We disagree with this. There is no sound planning sense behind nor justification for the removal of some land from Green Belt. For example, land at Burtonwood previously proposed for removal to enable an allocation for residential so as to support the natural and sustainable growth of Burtonwood has been deleted. This cannot be justified in planning terms.

#### Spatial Strategy Needs (page 28; paragraph 3.3.7+)

We would question whether the spatial strategy is deliverable, least in so far as it claims it can meet the need for new homes in the Borough. At paragraph 3.3.7 the UPSVLP suggest the urban area can accommodate around 11,800 new homes which means there is the requirement to release Green Belt land for around 4,500 homes in order for the Council to meet its housing requirement. The detailed land requirement calculation is set out in Policy DEV1.

We are surprised at this since previous iterations of the local plan suggested that there was insufficient brownfield land to accommodate anything other than a relatively small amount of residential development. This was certainly the case with the 2019 version.

Accordingly, one has to question whether some 7,300 units can be delivered on brownfield land as the new local plan envisages, this by reference to supply of such land. Linked to this, the target for delivery on Green Belt land, some 4,500 units, is far too little. If, as we suspect, there is little serious prospect that the Council will be able to deliver 7,300 units on brownfield land, then the local plan development and delivery strategy will fail. And additional land will need to be released from Green Belt in future to meet what will be the large resultant shortfall. It is our estimation, based on previous versions of the local plan and evidence bases, that current brownfield land supplies will be unable to deliver more than approximately 5,000 units, leaving a shortfall of 2,300 to be delivered on land currently in Green Belt.

Building on the points made above, the UPSVLP envisages distributing development, including residential, through a spatial strategy which envisages an urban extension to the south east of the main urban area, which will deliver around 2,400 homes in the plan period; development of Fiddlers Ferry opportunity site for 1,300 homes in the plan period up to 2038; development at Thelwall Heys of around 310 homes; and development in outlying settlements of around 800 homes.



The UPSVLP says at paragraph 3.3.9 that the Council believes this strategy option provides the best chances of meeting Warrington's housing needs. We seriously question this statement and the ability of the strategy to deliver anything other than failure. The South East Warrington Urban Extension (SEWUE) cannot be delivered until a wide range of infrastructure and services to support the new development are developed. This will take time to be approved and procured and will impact on viability, which suggests that delivery during the plan period is not guaranteed. Regarding the Fiddler's Ferry Opportunity site, there are serious deliverability issues associated with this development, not least is potential flood risk, given the sites location in low level land directly adjacent to the River Mersey, and the need to deal with contaminated land. Indeed, recent work (and related publicity) by agencies concerned with flood risk confirms this. The fact this site is set to deliver such a large part of the UPSVLP's housing requirement has to be serious cause for concern.

#### Exceptional Circumstances for Green Belt Release (page 32; paragraph 3.4+)

We agree as is set out in paragraph 3.4.1+ that the Council is able to fully evidence and justify the exceptional circumstances required for Green Belt release, for all Local Plan allocations, in accordance with the NPPF. However, it is our position that the Council can, and should have, planned for far greater levels of Green Belt releases, as was the case with the previous version of the Local plan, also justified by reference to NPPF, so as to create a truly sustainable and deliverable development strategy, as covered through earlier comments on the UPSVLP.

#### Updated Proposed Submission Version Local Plan (page 33; paragraph 3.4.2+)

With regard to the comment at paragraph 3.4.2 that, in accordance with paragraph 141 of the NPPF, the Council has examined fully all other reasonable options for meeting Warrington's identified need for development, this is simply not the case. This statement cannot be made when one considers that the earlier version of the local plan, which was published for consultation, also claimed to be able to satisfy relevant parts of NPPF, including exceptional circumstances case for release of land from Green Belt. The plan confirmed that this test was satisfied. This plan's development and delivery strategy was, in our view, was far more sustainable and believable than the one set out in UPSVLP. Indeed, we have come to the conclusion that the only reason the UPSVLP is being promoted, at the expense of the original version of the current local plan, the 2019 version, is because of local politics, i.e., disquiet by some communities and member concern at the level of Green Belt releases planned through that version of the emerging local plan.

At paragraph 3.4.3 the UPSVLP contends that the new local plan will ensure that as much use as possible is made of suitable brownfield sites and underutilised land, yet its processor, the 2019 version of the local plan, openly confirmed that there was insufficient brownfield and underutilised land to meet required levels for growth in housing and employment. Put simply, what's in the current version of the draft local plan, the UPSVLP, does not marry with statements and related work used to justify the previous iteration of the draft plan (2019 version), nor can the current claims be evidenced.

As such, and relating to the comments made at paragraph 3.4.3, we do not accept that the Council has carried out a believable review of its SHLAA and Brownfield Register. Had the Council done so it would have come to the obvious conclusion that there is insufficient brownfield land and underutilised land, along with a meagre reallocation of Green Belt, to meet stated growth targets. The only way these targets can be met is if more land is taken out of Green Belt, as was accepted and promoted through the previous version of the local plan.

### Objective W1 (page 37; paragraph 4.1+)

Building on points already made, Objective W1, to enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, some 14,688 new homes (equating to 816 per year) between 2021 and 2038, and 316.26 hectares of employment land between 2021 and 2038, will be delivered. These targets, based on the development and delivery strategy of the UPSVLP, will not be met.

### Policy DEV1 – Housing Delivery (page 37; 4.1.6+; Policy DEV1)

Building on points already made, and with regard to the UPSVLP housing Requirement, it is not accepted that, over the 18 year plan period from 2021 to 2038, a minimum of 14,688 new homes will be delivered to meet Warrington's housing needs. This is not possibly by reference to the sites/areas of land the UPSVLP envisages will come forward for development (allocated or windfalls which fall with the urban area).

Regarding housing distribution, it is claimed that the majority of new homes will be delivered within the existing main urban area of Warrington, the existing inset settlements and other sites identified in the Council's Strategic Housing Land Availability Assessment (SHLAA), which together have identified deliverable capacity for a minimum of 11,785 new homes. We do not accept that this target is believable nor is it deliverable.

The sites listed in the UPSVLP which are planned to be removed from the Green Belt and allocated for residential development we do not accept can deliver the necessary levels of new development to meet the planned housing target delivery figure, as set out above.

This includes, along with reasons why we have concerns about the site's delivery:

- South East Warrington Urban Extension – minimum of 4,200 homes of which a minimum of 2,400 homes will be delivered in the Plan Period – our concerns relate to amount of new infrastructure required, cost of such infrastructure, technical constraints, market interest and viability.
- Land at Fiddlers Ferry – minimum of 1,760 homes of which 1,310 will be delivered in the plan period as part of a wider mixed use development – Our concerns include delivery and technical concerns not least of which is flood risk.
- Thelwall Heys – minimum of 310 homes will be delivered in the plan period – We would question whether this level of development is deliverable.
- A minimum of 801 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to following outlying settlements of Croft – minimum of 75 homes; Culcheth – minimum of 200 homes; Hollins Green – minimum of 90 homes; Lymm – minimum of 306 homes and Winwick – minimum of 130 homes – We question whether this level of development is deliverable.

In addition, and linked to the criticisms made above, we also question why no meaningful amounts of land are planned to be allocated for development in Burtonwood and the likes of Winwick. This settlement has been excluded but similarly sized or smaller less significant settlements like Croft, Culcheth and Hollins Green receive allocations. Burtonwood had an allocation in the previous version

of the draft plan and would seriously benefit from an allocation. And this is the same for Winwick and the representor's land could satisfy this need.

#### Setting the Housing Target (page 39, paragraph 4.1.6+)

At paragraph 4.1.6 of the UPSVLP it confirms that the target of 816 homes per annum over the Plan period has been established using the Government's Standard Housing Methodology and that this is assessed in detail within the Council's Local Housing Needs Assessment (2021). The document acknowledges that 'this represents the minimum number of homes that Warrington is expected to plan for.' This also takes into account projected household growth and historic under-supply. Given the acknowledgement about historic under supply, due to the inadequacy of history development, delivery and settlement strategies of previous iterations of the local plan, one has to question why a figure of 816 units per annum has been selected. Surely, so as to ensure delivery of an appropriate number of units per annum, a bigger target figure should have been adopted. We are of the view that, at the very least, 900 per annum - approximately +10% of the figure planned to be used, should have been adopted. This per annum figure means that there is better prospect key plan objectives and development targets would be delivered on.

Similar points relate to points made in paragraph 4.1.7 of the UPSVLP regarding the Council's its Economic Development Needs (see further comment later on XXXX). We would say that this should be similarly increased from 316.26 ha to 350 ha (+10%).

#### Policy DEV2 – Meeting Housing Needs (page 33; paragraph 4.1.34+; Policy DEV2)

We make no comment on the need for the UPSVLP to plan for affordable Housing but can confirm that Policy DEV2 should be complemented by another policy setting out circumstances whereby and where planning applications for wholly affordable housing schemes which are not allocated as such will be considered positively. This would be in the form of, for example, policies which are similar to Green Belt exception policies.

#### Policy DEV4 - Economic Growth and Development (page 56; paragraph 4.2.4+; Policy DEV4)

Regarding the UPSVLP's employment land requirement, this plans for, over the 18 year Plan period from 2021 to 2038, for 316.26 hectares of employment land to support both local and wider strategic employment needs. We are of the view as set out earlier that this should be increased to 350 ha (10%+) so as to ensure delivery of important employment development opportunities based on historic under supply and delivery of key sites.

We also question whether the UPSVLP's employment land distribution strategy is what it needs to be to ensure that trends in demand and local market conditions are taken into account and addressed.

UPSVLP confirms that the Town Centre will provide the main location for new Class E Office development yet demand for such development in this location is low. It is high in peripheral locations well located close to the junctions on the sub-regional motorway network. As such this element of the wider delivery strategy will fail.

Regarding the Employment Areas that are identified to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses, these are already established and in the main are better located. As such these are likely to continue to prove attractive to investors

and occupiers. These include Omega; Woolston Grange; Appleton & Stretton Trading Estate; Winwick Quay; Birchwood Park; Centre Park; Lingley Mere; Gemini Westbrook.

A number of new sites will be allocated as new Employment Areas in order to provide sufficient land to meet Warrington's Employment Land Requirements: South East Warrington Employment Area (136.92 hectares) and Fiddlers Ferry Power Station (101.0 hectares). For reasons given earlier we have concerns about the employment land planned for Fiddlers Ferry given site related constraints and flood risk issues. If we are correct and this allocation has to be dropped for reasons of this ilk, then the strategy is some 100+ hectares short of land/sites. As an alternative, land north east of Junction 9 of M62 with A49, including land owned by the representors, could contribute towards some of this shortfall, and it is similarly well located.

Policies Relating to Objective W4 (page 71+; paragraph 7.1+)

To better meet Objective W4: To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles, we suggest that the UPSVLP should allocate land for development to better meet the need of travellers on the Borough's Road network. A suitable site would be land north east of Junction 9 of M62 with A49 at Winwick, largely land owned by the representors.

Policy MD2 - South East Warrington Urban Extension (page 193; paragraph 10.2.16+; Policy MD2)

For reasons already given we question whether this allocation, by reference to the terms and scope of Policy MD2, can deliver the levels of development envisaged under the policy, and by when, this because of technical issues, infrastructure requirements, related costs and related viability issues. The implication of this is the likely failure of the UPSVLP to deliver development targets, both housing and employment land.

Policy MD3 – Fiddlers Ferry (page 202; paragraph 10.3.15+; Policy MD3)

For reasons given earlier in these comprehensive representations, particular due to concerns of technical issues including contaminated land and flood risk concerns, we would question whether this policy, Policy MD3, can deliver all that is expected of it; indeed, we question whether the site should be allocated for development. If we are correct relating to our concerns regarding the suitability of this site for an allocation for development as set out in the UPSVLP, then some 1,310 homes and a considerable amount of employment land will not be delivered in the plan period, leaving the UPOSVLP development strategy incapable of delivery over the plan period.

We would be grateful if you would acknowledge safe receipt of the letter of representations and that they were received by the deadline of 15<sup>th</sup> November 2021.

Thank you.

Yours faithfully,



John Francis



Two Parcels of Land North East of M62 Junction 9 (with A49)

