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**The South Warrington Parish Councils' Local Plan Working Group  
Representations to the Submission Draft of the Warrington  
Borough Local Plan**

<b>GTP ref</b>	21-08-005
<b>Version</b>	V7 Final
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### Summary

#### Plan premise

- Allocate large areas of land for employment – much of which is green field, green belt. This exploits Warrington's main asset – location on a key intersection of the motorway network. Based on historic patterns of development, employment will grow because easy to develop sites, in strategically advantageous locations are attractive for developers particularly those in the logistics sector.
- Expectation of enhanced rail connections via HS2 and Northern Powerhouse Rail will act as further drivers for growth.
- Population and household growth will result – above that which might otherwise occur.

- Applying anticipated levels of growth to the methodologies for calculating housing needs presents requirements for new development which cannot be accommodated within the existing urban area.
- The release of Green Belt land to accommodate this development is thereby justified in the PSV.

#### Key areas of concern

- External Influences
- Uncertainty over key national infrastructure affecting Warrington
- Impact of emerging national strategies
- Changes to the Planning system
- Climate Change
- Changes in working and social practices post Covid

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Summary of issues leading to the conclusion that the plan is not sound and should not be adopted in its present form

- There is no justification for predicted levels of growth which are central to the spatial expression of the plan.
- There is no sound or logical connection between aspirational growth and the spatial plan.
- The development needs resulting from the presumed levels of growth does not take account of development activity and opportunity in neighbouring authorities.
- The Plan takes no account of wider issues of climate change or the impact of loosing wide areas of currently undeveloped land to development
- 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 clear provision for the compensatory improvement to the environmental quality and accessibility of land remaining in the Green Belt [NPPF 142]
- 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 convincing case presented which demonstrates that the form and nature of infrastructure necessary to accommodate the development proposed. The plan acknowledges that

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significant elements of infrastructure could only become deliverable with development scheduled beyond the end of the plan period.

- 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.
- 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.

- There is concern over the ability to deliver truly affordable housing which is consistent with the concept of the proposed new development in South Warrington.

### Issues relating to Growth

- Ambitious employment growth based almost entirely on expansion of logistics sector
- Issues relating to Housing Supply
- Assumed levels of household growth are unrealistic and do not represent historic trends or ONS population growth.
- Use of 2014 household growth rates distorts scale of growth since 2014. In the case of Warrington the later 2018 household growth rates are more closely aligned to trends. 2018 figures would provide for a housing

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supply target of 458 dpa across the plan period instead of 816.

- Average completions 2010-2020 500 dpa
- Issues relating to Employment Land
- Demand is based on market desire to locate on strategically well located sites, close to the motorway network on easy to develop sites.
- It is obvious that Warrington and South Warrington attractive on this basis.
- The function of planning process is to manage this demand and direct development away from areas protected from development and towards locations where wider public development, where NPPF requirements of sustainability can be achieved

### Issues relating to Green Belt release

- More realistic assessment of housing land supply and employment land requirements reduces the case for development on green field Green Belt sites.
- Evidence base does not support release of Green Belt
- Purpose and functions of Green Belt in South Warrington are evident, with no demonstrable exceptional circumstances to justify release.
- Fails to show NPPF requirement to enhance environmental quality and access to remainder of the Green Belt

### Issues relating to infrastructure provision

- Incomplete in the absence of highway links across watercourses.
- Contradicts policy to enhance town centre

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- Infrastructure proposals needed to serve the development proposed are undeliverable
- Infrastructure provision relies on development scheduled for beyond the plan period – i.e. all 4200 dwellings on SEWUE

### Issues relating to Air Quality

- Increases rather than decreases problems with air quality
- Issues relating to Environment (including flood risk)
- Development in areas affected by road noise
- No assessment of impact of development on hydrology
- No consideration of the value of areas to be developed terms of health and well being

### Issues relating to Ecology

- Strategic focus only on areas of international importance
- Protection of Manchester Mosses (north of M62) requires limitation of any development producing more than 200 HGV movements a day)
- No assessment of the environmental qualities of local ecology

### Issues relating to Character and Distinctiveness

- Development envelops Stretton, Appleton Thorn and encroaches on Grappenhall Village. Extends natural and established limits of Lymm

### Issues relating to Climate Change

- Not properly referenced as key driver of the form and location for development.
- Extensive development of green field contrary to national policy
- Heavily car based development incompatible with carbon reduction

### Issues relating to Sustainability

- Plan does not secure NPPF objectives for sustainability
- Issues relating to Deliverability
- Irrespective of adequacy of proposed infrastructure – questionable weather infrastructure proposed can be delivered in terms of funding and timing e.g. SEWUE infrastructure costs £191m (£45.5k per dwelling)
- Relies on full 4200 dwellings in SEWUE

### Appraisal of specific allocations and policies

- Sites allocated for major development cannot be delivered in the manner presented in the PSV.
- The impact of site allocations is poorly considered and incomplete.
- Development of allocated sites does not give appropriate weight to key planning material considerations.



### 1 Introduction

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

1.2 The South Warrington Parish Councils' Local Plan Working Group (SWP) formed in response to the Preferred Development Option issued by the Borough Council in the summer of 2017. Such was the level of community concern over the scale of development proposed for South Warrington, much on land which would have to be released from the Green Belt, that uniquely 6 Parish Councils covering South Warrington agreed to work collectively in presenting their concerns to the Borough Council. (Lymm, Grappenhall and Thelwall, Appleton, Stretton, Hatton and Walton). In addition Moore Parish

Council, in Halton Borough but directly affected by development in South West Warrington, joined the Working Group and has contributed to its output.

1.3 Representations were consequently submitted in response to the 2019 Proposed Submission Version (PSV 2019). It was considered that proposals contained within the plan were fundamentally flawed having been based on excessively ambitious levels of growth which distorted objectively assessed needs; followed an inappropriate strategy, and were undeliverable. SWP were of the firm view that the plan was not sound and failed to meet the requirements of national policy in the National Planning Policy Framework. *[The South Warrington Parishes' Local Plan Working Group – Representations to the Submission Draft the Warrington Borough Local Plan 14 June 2019]*

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1.4 Following the end of the consultation period the impact of the UK leaving the European Union, the production of the White Paper – Planning for the Future and then the Covid Pandemic radically changed the context in which the emerging local plan was being presented. To a large extent this reflected concerns which had been raised in SWP representations to the 2019 PSV

1.5 Warrington Borough Council correctly paused progress with the PSV 2019.

1.6 SWP made further representations at this time flagging the need for comprehensive review of the PSV 2019. An alternative approach was suggested – “A New Plan for a Changing World” was produced by SWP in September 2020. The document was presented publicly together with an online video presentation and submitted to the Council for consideration.

1.7 It is a matter of credit to the Planning Service of the Council, that a number of the issues raised by SWP in representation and subsequent presentations have been recognised as fundamental reasons for substantive amendment to the PSV 2019.

1.8 It remains the case however that the Proposed Submission Version 2021 (PSV 2021) proposes a level of development which is inadequately substantiated; unnecessarily removes large area of land from the Green Belt; proposes development which is not matched with necessary levels of infrastructure and lacks viability and deliverability.

1.9 From the perspective of the SWP the basic premise of the PSV21 is simple

- Allocate large areas of land for employment – much green field, green belt. This exploits Warrington’s main asset – location on a key intersection of the

motorway network. Based on historic patterns of development, employment will grow because easy to develop sites, in a strategically advantageous location are attractive for developers particularly those in the logistics sector.

- Expectation of enhanced rail connections via HS2 and Northern Powerhouse Rail will act as further drivers for growth.
- Population and household growth will result – above that which might otherwise occur.
- Applying anticipated levels of growth to the methodologies for calculating housing needs presents requirements for new development which cannot be accommodated within the existing urban area.

- The release of Green Belt land to accommodate this development is justified.

1.10 The key presumption to this scenario is that continued logistics based growth is necessary. This is at cost of the loss of extensive areas of Green Belt, consequent congestion, environmental harm, impact on Climate Change. This introduces the considerable risk of not only failing to provide for infrastructure needs created by the development, but also failing to “fix” existing issues. This drives a widening equality gap across the Borough.

1.11 The Plan continues to fail to meet the tests of soundness as demonstrated by the conclusions to each of the topic based areas of consideration highlighted below.

### 2 Key areas of concern

2.1 Whilst the pause and re-assessment of the PSV19 is welcomed, the SWP questions whether key areas of concern have been fully addressed.

#### External Influences

2.2 It is questioned whether the complexity of current political, economic and social influences on the way that Warrington functions and operates have been fully taken into account.

2.3 The implications of Brexit are still emerging in a number of ways. Unprecedented labour shortages, increasing costs and supply chain issues will impact on sectors of the economy relied upon to deliver predicted levels of growth in Warrington. Some these issues may be short term but they will impact on at least the early parts of the plan period.

#### Uncertainty over key national infrastructure affecting Warrington

2.4 There is still uncertainty over the delivery and impact of key strategic infrastructure development including HS2b and Northern Powerhouse Rail.

#### Impact of emerging national strategies

2.5 There is no clarity as to the impact of the Government's levelling up agenda or how this might impact on the North West in general and Warrington in particular

#### Changes to the Planning system

2.6 Changes proposed in the "Planning for the Future" White Paper have apparently been paused.

#### Climate Change

2.7 Issues relating to climate change have been the subject of increased focus nationally and locally. The Government has committed to an increasingly rigorous approach to

carbon emissions. What impact might this have on development costs for developments wholly dependent on road based transportation? The Council declared a Climate Change Emergency in 2019 and appointed a Climate Change Commission in 2020. Is the PSV21 consistent with the other strategies and policies of the Council?

### Changes in working and social practices post Covid

2.8 It is clear that the Covid Pandemic has changed the way that people live and work especially in terms of working from home, commuting patterns and the importance of open, green space. Has this been considered in the content of the PSV?

### 3 The Representation

#### 3.1 The representation is set out as follows

- National Policy Context
- A portrait of South Warrington
- 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 Air Quality
- Issues relating to Environment (including flood risk)
- Issues relating to Ecology

- Issues relating to Character and Distinctiveness
- Issues relating to Climate Change
- Issues relating to Sustainability
- Issues relating to Deliverability
- Appraisal of specific policies
- Issues relating to Community Engagement

3.2 A conclusion will appraise these issues and show how in the opinion of the South Warrington Parish Councils (SWP) that the plan is not sound and should not proceed to adoption in its present form.

3.3 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 plan in terms of approach and

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objectives. It was not surprising 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.

3.4 The process of taking the findings of the PDO and producing a submission draft was poor in terms of engagement with community groups. The PSV 2019 attracted over 3000 responses.

3.5 Unfortunately some of these issues remain with the PSV 2021. There has been no clarity over the process of producing a new submission draft until papers were released as background documentation to a report to the Council's Cabinet.

3.6 As noted elsewhere it would appear that a number of documents were produced in a very short period of time, in some cases days before a document was placed before the Cabinet of the Council seeking approval for issue for consultation as the Preferred Submission Draft. How can the content of that extensive range of documentation have been fully assessed in the production of the PSV21?

3.7 It is accepted that the Local Plan is a strategic document. Unlike other Local Planning Authorities it is presented as a single strategy, allocations and development management document. The viability and deliverability of the Plan relies on a range of indicative master plans and development briefs, most produced by third parties and apparently with no level of community engagement or member sanction. A number of these documents have been produced by parties with a vested interest in

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securing development, tilting the outcome of policy allocations to developer rather than public interest.

3.8 It has been suggest that these development briefs are indicative, but then considerable reliance is placed on the detail of these documents to demonstrate viability, deliverability and intended levels of infrastructure delivery. This approach is flawed, especially given the unique relationship between the south of Warrington, the town centre and other key parts of the Borough with three significant waterways bisecting the town.

3.9 The scale and focus of development in the South and West of Warrington will not deliver the stated objective of Warrington being a place that will :

- Provide opportunities for the most vulnerable;
- With a strong and sustainable economy that benefits everyone

- With strong, active and resilient communities; and
- Be a carbon neutral, exemplar green town

*[PSV 2021 3.1.3 – Vision Warrington 2038 and beyond]*



4 National Policy Context

Principles and sustainability

4.1 It is recognised that the Borough Council has a statutory obligation to produce a development plan. – *“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.” [NPPF 2021 para 15]*

4.2 Relevant paragraphs of the Framework are summarised below.

4.3 *“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 2021 Paras 8 and 9]*

4.4 *“All plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; mitigate climate change (including making use of land in urban areas and adapt to its effects*

*Strategic policies should as a minimum provide for objectively assessed needs for housing and other uses, as well as other needs which cannot be met in other areas, unless:*

- *The application of policies in this Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall*

*scale, type or distribution of development in the plan area.*

- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against this Framework taken as a whole.*

*[NPPF 2021 Para 11]*

#### *4.5 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 2021 16]*

*4.6 Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for*

- *Housing (including affordable housing), employment, retail, leisure and other commercial development;*

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- *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal management;*
- *Community facilities (such as health, education and cultural infrastructure);*
- *Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

*[NPPF 2021 para 20]*

*4.7 Strategic policies should look ahead over a minimum period of 15 years from adoption, to anticipate long term requirements and opportunities such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the*

*strategy for the area, policies should be set within a vision which looks further ahead (at least 30 years) to take into account the longer time scale for delivery. [NPPF 2021 para 22]*

*4.8 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 2021 Para 31]*

*4.9 Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal ... This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and wherever possible alternative options which*

*reduce or eliminate such impacts should be pursued.*

*Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). [NPPF 2021 para 32]*

4.10 *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 2021 Para 34]*

4.11 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 2021 Para 35]

### Housing Supply

4.12 *"It is important that a sufficient amount and variety of land can come forward where it is needed..."*  
[NPPF 2021 Para 60]

4.13 *".. 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 2021 Para 61]*

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

4.15 *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 2021 Para 73]*

4.16 *“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 2021 Para 74]*

### Economic development

4.17 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 2021 Paras 81-83]

### Vitality of Town Centres

4.18 Planning policies should support the role that town centres play at the heart of local communities. [NPPF 2021 Para 86]

### Promoting Healthy and Safe Communities

4.19 Planning policies should aim to achieve healthy, inclusive and safe places which promote social interaction,

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are safe and accessible, enable and support healthy lifestyles [NPPF 2021 Para 92]

### Promoting sustainable transport

4.20 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 2021 Para 104]

### Making effective use of land

4.21 Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating

objectively assessed needs in a way that makes as much use as possible of previously developed land. [NPPF 2021 Para 119] The

4.22 Planning policies should give substantial weight to the use of suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. [NPPF 2021 Para 120(c) T

4.23 Local Planning authorities and other plan making bodies should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites in brownfield registers, or held in public ownership, using the

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full range of powers available to them. This should include opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers. *[NPPF 2021 para 121]*

### Achieving well designed places

4.24 The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is key aspect of sustainable development, creates better places in which to work. *[NPPF para 126]*

4.25 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.
- Optimise a mix of development , supporting local facilities and transport networks
- Create places which are safe, inclusive and accessible, promoting health and well being and a high standard of amenity.

*[NPPF 2021 Para 130]*

### Protecting the Green Belt

4.26 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 2021 Para 137]*

4.27 *“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.” [NPPF 2021 para 140]*

4.28 *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. This will be assessed through the examination of its strategic policies , which will take into account the preceding paragraph , and whether the strategy ;*

- *Makes as much use as possible of suitable brown field sites and underutilised land;*
- *Optimises the density of development, including the significant uplift in minimum density standards in town and city centres and other locations served by public transport.*
- *Has been informed by discussion with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground [NPPF2021 para 141]*

4.29 When reviewing Green Belt boundaries, the need to promote sustainable forms of development should be taken into account. Consideration should be given to the consequences for sustainable development of channelling development towards urban areas. Where it has been



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 2021 Para 142]*

### Climate Change and flooding

4.30 The planning system should support the transition to a low carbon future in a changing climate, shape places in a way contributes to radical reductions in green house gas supporting renewable and low carbon energy and associated infrastructure. *[NPPF 2021 para 152]*

4.31 Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. *[NPPF 2021 para 160]*

### Conserving and enhancing the natural environment

4.32 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 174]*

### Pollution and air quality

4.33 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 2021 Para 185]*

4.34 Planning policies should sustain and contribute towards compliance with relevant limits for air quality *[NPPF 2021 Para 186]*

### Conserving and enhancing the historic environment

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

- Sustaining and enhancing the significance of heritage assets
- Considering the desirability of new development making a positive contribution to local character and distinctiveness. [*NPPF 2021 Para 190*]

### 5 A Portrait of South Warrington

5.1 To fully understand the area and its context within Warrington and the wider area, it is 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. This is particularly important as descriptions of the area within the Submission Draft and background papers lack accuracy and expose a lack of local knowledge.

5.2 South Warrington is separated from the rest of the Borough by its position south of the River Mersey and the Manchester Ship Canal, indeed it was only after local government reorganisation in 1974 that areas south of the Ship Canal ceased to be urban and rural districts within Cheshire and became part of the newly established

Warrington Borough Council. Warrington itself ceased to be located with the administrative boundaries of Lancashire and came to be administered as part of Cheshire.

5.3 There is no formal definition of South Warrington, although the 2014 Core Strategy logically presented the Borough as having four neighbourhood areas. The town centre and inner wards; the west based around Gt Sankey, Penketh, Burtonwood and Winwick and the east based around Woolston, Birchwood and Culcheth. The Southern neighbourhood was based on the remaining areas south of the Mersey.

5.4 The function of different parts of Warrington is confused, with documents such as the Central 6 Regeneration Master plan and the Town Centre Master Plan presented outside of any formal planning policy context, with limited consultation and recognition of how proposals and policies within these

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documents need to be considered in the context of the Borough as a whole.

5.5 The southern neighbourhood was typically represented as the wards south of the River Mersey. For the purpose of considering the impacts of the Submission Draft, the precise boundary is of no particular significance, whether that is the Ship Canal or the River the key concerns remain unaltered.

5.6 It is a unique characteristic of Warrington that it is divided by three separate major watercourses. Many towns have developed on opposite sides of a river, as is the case in Warrington, but history of the area has also been influenced by the later creation of the Bridgewater Canal and later the Manchester Ship Canal. It is the presence of these waterways and their crossing points which is influential on the pattern of development which has taken place historically and how the Borough might develop in the future.

5.7 Parts of the area came to be considered as part of the designation of Warrington and Runcorn as a New Town in the mid 1960's. Areas to the south of Stockton Heath and east of Appleton were developed under Section 7(1) consents granted under the New Town Act. The development was not completed and significant highway infrastructure which had been proposed was not implemented. Land has since passed from the control of the Development Commission, through English Partnerships, to the Homes and Communities Agency and now to Homes England. It is considered that there is a lack of clarity over the extent to which historic consents have been passed on through this organisational and administrative change and that the Council should be challenged on any claim as to extant permission for development, particularly in the context of the disconnect from the approved New Town Master Plan and particularly

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the related infrastructure which was intended to support the development then proposed but has remained unimplemented.

5.8 South Warrington is otherwise characterised by a collection of small settlements and villages. The settlements of Walton, Stretton, 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 20<sup>th</sup> 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 of which lies within the North Cheshire Green Belt as formally defined in successive development plans since the early 1990's.

5.9 Further south the settlement of Appleton has to a large extent already been subsumed by those elements of "New Town" development which was built in the 1970's and 1980's. This area lacks the character of other parts of South Warrington, but it does benefit from a high quality of landscaping with large areas of green space retained and maintained to a standard not repeated in later development. Notwithstanding the impact of this development the area benefits from its proximity to open countryside, access to open fields and woodland.

5.10 The villages of Hatton, Stretton (including Lower Stretton), Walton Village and Appleton Thorn continue to present as distinct settlements notwithstanding their proximity to the urban areas of South Warrington. Each village is based on a historic core with churches, village halls and public houses at the centre.

5.11 The character of the area is dominated by the proximity to open countryside with a landscape which generally slopes from south to north before it is intersected by the Bridgewater Canal corridor which runs west to east across the area. Much of the area is laid to agriculture with grade 2 and 3 classification. The area is interspersed with woodland and copses of trees often tracing historic water courses although the pattern of hydrology across the area has been altered with the advent of the Bridgewater and Manchester Ship Canals.

5.12 Although of an industrial origin the Bridgewater Canal has taken on the role of a key part of the landscape of Warrington, providing a tranquil tree lined corridor across the area. It is considered that in line with other canal corridors there would be value in consideration of protection of the

character of the Bridgewater Canal through designation as a conservation area.

5.13 Views southwards from the A56, A49 and A50 place Warrington in its context sitting at a point in the valley of the River Mersey where the river narrows and historically the siting of crossing point east of the estuary. Views north from these key gateways into the town and from the B5356 Stretton Road provide a vista across the town dominated by the spire of St Elphin's Parish Church.

5.14 South Warrington 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.

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[WBC Ward Profiles 2018 and LGA Research Report – Demographic Report 2017]

5.15 A clear pattern exists for travel to work across Warrington. In the absence of a significant office based sector in Warrington Town Centre, those in higher professional and managerial roles will look to Manchester, Liverpool and Chester as locations for employment. Some of this group will be employed on Birchwood Park or Daresbury Science Park, although anecdotal evidence suggests that even though Warrington based, employment often focuses on core locations outside the Borough. Sellafield Ltd is a good example, with a Headquarters building in Birchwood but all of its core activity taking place on site in Cumbria. The implication is that residents of South Warrington who tend to work in higher professional and managerial roles will work in

Manchester and will commonly use the car as the main mode of travel to work.

5.16 2011 Census data indicates high inflows for employment from residences in St Helens, Wigan and Halton, with high outflows from residences in Warrington to Halton, Manchester, Trafford and Liverpool. The same data source indicates that more than 50% of those in employment in the South Warrington Parishes are in professional and managerial roles. [Warrington Borough Council – Borough Profile 2015/ONS]

5.17 Partly as a consequence of this travel to work pattern, residents of South Warrington tend to look to locations outside Warrington for shopping and leisure. Altrincham, Northwich, Knutsford and Runcorn provide preferred and more accessible locations. Shopping will often

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look to The Trafford Centre, Liverpool One and Cheshire Oaks as accessible locations with easier and often free parking.

5.18 This situation is a reflection of how South Warrington has developed as a dormitory settlement. The New Town Master Plan was not completed. The concepts behind the New Town are outdated. The Master Plan was a model based on accommodating use of the private car, with major elements of new road infrastructure to enable access to the centre. The Submission Draft – PSV21 has a distinct similarity with the Master Plan. Such replication is backward looking given the need to move away from dependence on the private car and the omission of large parts of the infrastructure envisaged to support the New Town Plan.

5.19 It is known that in the 1980's the Borough Council resisted new development on New Town sites until new infrastructure was in place. The development took place

anyway and has recently been supported by the Council, notwithstanding issues with infrastructure, particularly highways.

5.20 There is a disconnect between the southern areas of the Borough and the rest of the town, but established patterns of development, places of work, shopping and retail are established and not readily changed.

5.21 To a large extent the pattern and urban form of South Warrington, the relationship of later development with historic villages and the setting within areas of open country has come to create a mature and distinctive character which would be significantly eroded by the scale, form and location of development now proposed. In contrast to large scale development to the north of the Borough this development is not proposed on former airfield and military storage facility



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which has never been in the Green Belt but on open green

field sites within the Green Belt.

### 6 Reasons why the Proposed Submission Version cannot be considered to be sound

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

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

6.3 The plan is not sound and should not proceed to adoption in its present form. The changes in this, the second version of a submission draft, compared with the first version are insufficient to resolve the concerns of the SWP as presented in previous representations. If it were to proceed to examination then there would be a significant

risk that it would not be able to be adopted – and therefore changes should be made now at this stage to avoid a much longer adoption process.

6.4 This conclusion is reached on the premise that

- There is no justification for predicted levels of growth which are central to the spatial expression of the plan.
- There is no sound or logical connection between aspirational growth and the spatial plan.
- The development needs resulting from the presumed levels of growth does not take account of development activity and opportunity in neighbouring authorities.
- The Plan takes no account of wider issues of climate change or the impact of losing wide areas of currently undeveloped land to development

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- 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 clear provision for the compensatory improvement to the environmental quality and accessibility of land remaining in the Green Belt [NPPF 142]
- 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 convincing case presented which demonstrates that the form and nature of infrastructure necessary to accommodate the development proposed can be delivered. The plan acknowledges that significant elements of infrastructure could only become deliverable with development scheduled beyond the end of the plan period.
- The proposed development will result in an unacceptable level of harm to air quality and the environment
- The proposed development will destroy the character and distinctiveness of Warrington and its constituent settlements.
- The proposals are not sustainable and run counter to national policy.

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- 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.
- There is concern over the ability to deliver truly affordable housing which is consistent with the basis of a plan which seeks to provide residential and employment related development which is linked in such a way so as to deliver sustainable development.

### 7 Growth

7.1 The Borough Council published an Economic Development Needs Assessment Update produced by Mickledore and BE Group in February 2019. A refresh of this documentation has been produced in by BE Group in August 2021. It is of concern that the August 2021 refresh considered the 2019 version of the NPPF despite that being superseded by the July 2021 NPPF at the time of its publication.

7.2 It is noted that most of the background papers for the PSV21 were produced simultaneously in August and September 2021 – days before the publication of the PSV for the WBC Cabinet meeting on 13 September 2021. The degree to which the EDNA has been properly taken into account in the production of other documents in the evidence base must be questioned.

7.3 It is noticeable that the Cheshire and Warrington LEP Strategic Economic Plan is less prominently referenced than in PSV2019. The SWP welcomes this approach in the light of previous criticism by SWP that the SEP was excessively aspirational, promotional and increasingly unsupported as economic and social/political context has dramatically changed.

7.4 It is clear however that the assessment still relies on a growth scenario based on the assumption that ambitious development plans and allocations will of themselves generate economic activity.

7.5 Critically for Warrington the Assessment 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 continued reference to the LEP Strategic Economic Plan Jobs Growth Scenario in predicting growth.
- Logistics land requirements driven by proximity to motorway junctions.

- Variation in forecasts from alternative providers and disregard of options based on those forecasts. Some appraisals prior to the production of the Preferred Developments Option in 2017 were suggesting growth levels of between 15% and 20% assessing patterns in GVA growth against the aspirations of the Local Enterprise Partnership (LEP) Strategic Economic Plan.

7.6 The SWP remains concerned that the approach taken to the consideration of growth is unreliable and unrealistic. It is acknowledged as being underpinned by the unsubstantiated and business driven expectations of the LEP Strategic Economic Plan (SEP). This body is not democratically accountable and is led by business interests with direct involvement in land released for development on back of the Needs Assessment. This concern is reinforced by the

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evidence of different assessments with different conclusions as to levels of growth produced.

7.7 This position is repeated with the evidence base for the 2021 PSV with two assessments producing two different forecasts for jobs growth. Irrespective of this position these forecasts are dismissed in the EDNA on the back of predictions based on historic growth rates and take up of employment.

7.8 It remains the contention of SWP that this approach is fundamentally flawed. Warrington has inevitably experienced, inflated, higher than average rates of growth in this regard as result of being able to deliver shovel ready development land at Birchwood and latterly Omega. This has attracted development to Warrington and away from other locations simply on the basis of availability. It is not just Warrington's strategically beneficial location which has attracted development, but also the fact that highway and

infrastructure issues had been resolved. Issues relating to ownership and planning obligations were largely already resolved. Such advantages were clear attraction for strategic planners for commercial organisations a number of which are commonly based overseas.

7.9 The introduction to the EDNA acknowledges that the research methodologies used to consider historic and predicted growth rates and therefore OAN includes key strategic stakeholders. Some of those stakeholders have a vested interest in promoting development and growth.

7.10 Warrington &Co is Warrington BC's development arm with a mandate to support and promote economic growth. It is also the part of the Council which has invested in and now owns and controls substantial areas of employment land in Birchwood and Appleton.

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7.11 It is also clear that many sites with development potential are already in the control of developers. Langtree, Peel and Liberty have control over large parts of the areas of land which might be considered for allocation. Logically and legitimately such parties will highlight demand of employment land and the benefits of development of land in their control. It is however considered that in reality need is driven by supply. In the current market any site within a motorway corridor can be shown to be needed. The availability of a green field site, next to a major motorway junction will inevitably attract interest and draw attention away from less strategically attractive, more difficult to develop sites.

7.12 It is understandable why Warrington would seek to maintain its status as a key destination for investment particularly around the logistics sector. However, given the

high levels of employment within the Borough, there will be a need to import labour. Notwithstanding attempts to deliver a wide housing mix in new housing allocations, it seems unlikely that potential new residents so employed, would be able to relocate to South Warrington.

7.13 Evidence produced at the appeal into the Stobart distribution centre at Appleton Thorn (APP/MO655/W/19/3222603) illustrated the location of the place of residence for those employed at the existing Stobart Depot. 60% of staff lived outside Warrington Borough. Most others lived outside South Warrington.

7.14 In contrast to the approach to development plans in other locations, the predicted levels of growth in the case of Warrington are almost entirely based on the impact of development envisaged in the plan as the key driver. There is little or no conclusive evidence as to how activity elsewhere in



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Cheshire will prompt growth at the levels predicted. The plan is based on aspiration rather than justified through a sound evidence base.

7.15 There are numerous examples and concerns as to this absence of evidence.

7.16 The Strategic Economic Plan was produced by the LEP in 2018. The Plan anticipated growth based on the impact of HS2 in Crewe, development of a science and technology base across East Cheshire, car and aerospace development in West Cheshire. With the exception of additional warehousing to support an already dominant logistics base for the Warrington economy, there was no such catalyst for growth in Warrington other than its self imposed aspiration to secure "city" status, as set out in the PDO.

7.17 The period since the inception of the SEP has seen many changes. Leaving the European Union has clearly impacted

on development decisions for businesses with strong European connections. Car manufacturing is controlled by Peugeot, aerospace by Airbus.

7.18 Issues with cost and debate over benefits of HS2 phase 1 has brought into question to certainty and timing of delivery of HS2 phase 2.

7.19 The scale of population and household growth and increase in the number of jobs envisaged by the SEP is no longer achievable. The needs assessment based on the aspirations of the SEP and historic trends which were achieved in an entirely different economic environment are no longer relevant.

7.20 Growth appears increasingly dependent on demand resulting from the development of the Port of Liverpool. Accommodating this growth, principally for logistics, is a key part of the emerging local plans in St Helens and Halton. The

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absence of analysis of competition to meet these needs from any Statement of Common Ground is an issue of concern.

7.21 Apart from figures suggesting the overall area of land required to serve this source of economic activity there is little or no evidence to demonstrate a direct relationship to logistics development in Warrington.

### Key Challenges as to Soundness - Growth

*The PSV21 is purely driven by the aspiration to accommodate growth. This runs counter to the provisions of the NPPF which seeks to ensure that development is sustainable across economic, social and environmental objectives. The plan is predicated on a single objective and does not balance the considerations in the manner expected by paragraphs 8 and 9 of the Framework.*

*If the Plan is unbalanced and is excessively catered towards an economic objective then this will mean that this Plan would not be contributing towards the objective of sustainable development (which is development which balances all three objectives in 'mutually supportive ways').*

*This is a fundamental legal issue as s.39 (2) of the Planning and Compulsory Purchase Act 2004 requires the local plans do this. A failure to do so would mean the Plan is legally flawed as well as being inconsistent with the test of soundness at NPPF paragraph 16a.*

*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.*

*The period between the PDO consultation, PSV19 and PSV21 provides ample illustration of rapid change. PSV21 is still based on the same presumptions around growth anticipated in the Cheshire and Warrington LEP Strategic Economic Plan of 2018.*

*There still uncertainty over the later phases of HS2, whether or not the Golborne Link will by- pass Warrington*

*There is 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.*

### 8 Housing Supply

8.1 The PSV relies on a Housing Needs Assessment date August 2021.

8.2 The essential calculation of need is addressed in a context of the expectations of the NPPF and PPG producing the annual housing need figure of 816.

8.3 As with the previous 2019 PSV it is contended that the use of 2014 based household projections is flawed and fails to represent true levels of need as a consequence of change in circumstances since those projections were considered.

8.4 The requirement for 816 dpa is based on an assumed growth of households of 7145 households, an increase of 7.6% over the period 2021-2031.

8.5 Using ONS projections for the same period but based on the 2018 projection suggests a predicted growth in

households of 4014, an increase of 4.37%. Using the standard methodology to include the affordability ratio produces a figure of 458 dpa.

8.6 The significant contrast between the figures requires careful consideration before committing to a pathway which would require the release of such large areas of Green Belt.

8.7 Appendix 6 of the Council's 2020 Strategic Housing Land Availability Assessment (SHLAA) provides details of house completions across the period 2003/04 to 2019/20. These figures reveal that across a 17 year period completions per annum has only exceeded the 816dpa on four occasions – all between 2004 and 2008. This was at a time when a small number of sites, producing high density development came on stream. This reflected the Town & Country Planning (Residential Development on Greenfield

Land) Directive 2000 and requirements for higher density development – sites such as Chapelford and the redevelopment of the former Carrington Wire Works. Over the 17 year period the average completions per annum equates to 648 dwellings per annum. For the ten years to 2020 this figure drops to 500 dwellings completed per annum.

8.8 The same appendix provides a figure for annual build rates across the small, medium and large sites included in the analysis. This suggests that on larger sites – more than 150 dwellings an average build rate per annum of 56 dwellings is achieved. Whilst treated with caution this data published by the Council appears to contradict claims that development on individual sites, including those with the SEWUE will exceed 160dpa. This being considered a build out rate necessary to secure require levels of delivery.

8.9 Paragraph 61 of the NPPF clearly requires the use of the standard method contained within national guidance to produce a local housing need assessment. The NPPF does however also note scope for alternative approaches which reflect current and future demographic trends and market signals. There is no evidence that consideration has been given to this provision. There are a number of exceptional circumstances at play here which would justify the use of an alternative approach – including the unprecedented impact of Covid. The world has changed drastically since 2014.

8.10 ONS population forecasts predict an increase in the population of Warrington of 6722 between 2018 and 2038. An increase of 3.2%. The demand for household growth anticipated in the PSV can be seen to be driven by speculation of additional increases in population arising

almost entirely by take up new employment opportunities in the logistics sector as land is released for such development.

8.11 In order for the PSV to the secure delivery of development which is sustainable – economically, socially and environmentally, it would be necessary, to totally remodel the pattern and form of the housing market across the whole of Warrington. The majority of new housing in South Warrington would have to be at a level of affordability commensurate with types of employment opportunity created by the release of Green Belt land for logistics based development

8.12 No recognition is given to this pattern of housing development across south Warrington. Housing in South Warrington supplies a different market to that provided by the urban core, newer development in North West

Warrington and the northern villages. The housing needs for the borough are different across the area. They reflect proximity to sources of employment, travel to work modes, mobility of potential occupiers and a range of socio-economic factors. Housing need for greater Warrington cannot be arithmetically assessed in a vacuum divorced from economic and demographic issues. The 'one size fits all' approach is not suitable given the history and demography of South Warrington as set out in Chapter 5.

8.13 There is risk that large scale addition of affordable housing in South Warrington, will make inequality worse rather than better across Warrington. Focus on regeneration would be lost and the improvement to infrastructure and service provision to less privileged parts of the Borough would be diminished rather than enhanced.

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8.14 The housing market in Warrington and the region in which the town is located is complex. It is driven as much by supply as need, with take up arising from market values as much as growth in narrowly defined areas.

8.15 The release of land in Cheshire East and Cheshire West and Chester as development plans have been adopted changes the housing market, as does development in the west of Trafford and Salford. At a more local level development at Sandymoor and Daresbury in Halton impacts the housing market of south Warrington

8.16 It is clear from travel to work patterns that Warrington is a source of employment for large numbers living outside the Borough. Often this employment is based on lower paid areas of employment outside the high earning professional and managerial sector. Information

produced by those presenting development proposals within the logistics sector suggests that up to 60% of their workforce lives outside Warrington. Logic would suggest that predicted population growth is not necessarily aligned with sources of predicted employment growth. Building of new housing in South Warrington will not be able to guarantee the delivery of the scale or affordability of housing which would change this unsustainable pattern of development. Increased growth in neighbouring boroughs would be of greater benefit in terms of regeneration, economic development and sustainable transport patterns, than an approach which takes an ill-considered option, responding only to the expectations of landowner and developers. The approach adopted by Warrington is inwardly focused and does not take account of the sub regional and regional position.

8.17 Possibly the only positive from the previously proposed Garden Suburb proposal was the application of Garden City principles where the concept of closely connected places for living, working and leisure are followed.

8.18 In reality this concept of a connected, holistically planned settlement was impossible to deliver and was not reflected in the previous PSV.

8.19 The Local Housing Needs Assessment (LHNA) acknowledges the complexity of marrying economic growth with population growth. Whilst utilising a range of sophisticated assessment tools, the LHNA demonstrates an absence of key drivers affecting economic growth and population growth in Warrington and the surrounding region. It ignores interaction with neighbouring authorities and proposals within their

development plans – contrary to the need for plans (and the evidence underlying them) to be effective by cross working on strategic issues such as housing. It ignores historic levels of housing development and ignores decreasing predicted levels of population.

8.20 The level of economic growth is not based on tangible evidence based on the impact of new large scale development, new infrastructure or specific activity which is of sufficient scale to generate increased activity supporting inward migration and growth generation.

8.21 The driver for growth and therefore for housing is almost wholly based on employment opportunity arising from new development based around logistics. Such development is highly dependent on locations in key positions to the strategic motorway and highway network. Given Warrington's location on the M6, M62



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and M56, it is naturally attractive to such uses, but in an increasingly competitive market, neighbouring authorities are also presenting the scope to accommodate logistics based development. It would almost certainly be possible to secure development alongside much of the motorway network across Warrington, particularly at any of the seven motorway junctions, but that is only justified on the basis of a Warrington's corporate agenda driven by growth at the cost of all other considerations.

8.22 The Council has a vested interest in securing such growth as result of investment in the acquisition of sites including logistics based development

8.23 The Council's 2020 Strategic Housing Land Availability Assessment includes at appendix 6, figures for the total number of gross completions from 2003/4 to 2019/20.

Over that 17 year period a total of 7006 homes were completed, an average of 412 dwellings per annum. This represents a historic level of delivery which is only 51% of the average delivery anticipated by the Submission Draft.

8.24 Growth appears entirely dependent on the economic impact and job creation of 4 million sq ft plus of modern logistics warehousing.

8.25 The HCA Employment Development Guide 2015 suggests that there is a downward pressure on employment density in buildings serving the distribution sector, although it is acknowledged that some additional highly skilled roles will emerge with specialist maintenance and programming of automated equipment. Development for such uses will generate half the employment density produced by B1 or B2 uses.

8.26 The seasonal nature of retail related distribution necessitates short- term and zero hours contracts.

8.27 The LHNA dismisses alternative growth forecasts previously predicted by Oxford Economics and Cambridge Economics, preferring an appraisal which more closely reflects historic growth patterns without any clear justification, and without consideration of the volatility and unpredictable nature of market conditions.

8.28 Given low levels of unemployment in Warrington, that growth will drive population growth and inward migration with consequent stimulation of the local economy. The plan presumes that new infrastructure can be delivered within the Plan period so as to viably connect areas of higher unemployment with areas allocated for new commercial development.

8.29 The form and scale of growth anticipated appears to disregard historic relationships with neighbouring areas and travel to work patterns. South Warrington has become attractive as a place to live as an alternative to more expensive suburbs of South Manchester. More rural surroundings but with ease of access to the motorway network, as well as cost, has influenced this pattern. Unless congestion reduces on the motorway network or public transport connections dramatically improve, the basis for high levels of demand for housing in South Warrington will diminish.

8.30 Understanding of the patterns of demand and supply of housing across Warrington is critical to provide context to the application of household growth and population forecasts to assess trajectories for future development.

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8.31 New Town Designation has been a major influence creating a supply of housing land beyond a scale which would be otherwise developed. The availability and advent of the Chapelford development on the former RAF Burtonwood base created supply which exceeded demand and resulted in development extending beyond the expected period for completion.

8.32 The decision to release land on the previous employment allocation of the Omega development has influenced the ability to deliver high levels of supply.

8.33 During the 1990's the Council was unable to demonstrate adequate levels of supply against requirements which were then applicable, resulting in development on Green Belt and Open Countryside which had previously been resisted. It is evident that developers were attracted to high value development of green field sites in areas such

as Lymm. Notwithstanding provision for affordable housing, these developments provide ample demonstration of how such development has not made any realistic contribution to the availability of truly affordable accommodation in appropriate locations and critically, this has demonstrated the adverse impact on regeneration at the heart of the urban area. It was only with Government Directives in the 1990s and 2000's prompted that developers started to reassess their approach to development at the heart of the settlement. The demise of traditional industry in Warrington created the opportunity to reassess the viability of former tannery, wire works and similar sites within central Warrington. This resulted in a peak of development in the mid 2000's with higher density development including apartments distorting the supply position

across this period to a point that the Council introduced a moratorium on new housing developments.

8.34 The evidence base to the PSV21 does not include any clear assessment of current levels of urban capacity. Submissions reference expectation of the scale of development possible within the existing settlement but there appears to be no specific update to the evidence base used for the 2017 PDO. The Plan in this sense is backward looking rather than forward looking.

8.35 The release of significant areas of undeveloped land in the Green Belt threatens the Council's objectives to secure regeneration and to address current inequalities between the villages and suburbs on the edge of the town, and inner parts of the town.

### Keys Challenges as to Soundness - Housing

*The scale of housing development proposed needs to be sense checked and reassessed. 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.*

*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. A 'one size fits all' approach is not justified or appropriate.*

*Control over the rate of delivery will not be 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. This makes the Plan as a whole undeliverable – a point that will be expanded upon in Section 11.*

*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.*

*Density figures in the plan require a "sense check" There has been no discussion with community representatives prior to the release of the Submission Draft relating to the approach to density. Low densities in the SWUE and Garden Suburb require more in depth analysis as does the ability to secure higher densities in the urban area.*

## 9 Employment Land

9.1 The largest single employment land allocation within the submission draft is within Appleton Parish but immediately abuts and impacts heavily on the wider South Warrington as whole. The SWP contends 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 land from the Green Belt.

9.2 Curiously the South East Warrington Urban Extension – A Deliverable Proposition – August 2021 produced by Homes England and Miller Homes fails to include any reference to the employment land allocation, yet the rationale behind the need to release Green Belt land for housing

development is based on the growth and level of household formation generated by the additional economic activity on this and other employment sites.

9.3 Proposed policy DE4 of the PSV makes no specific reference to the breakdown of employment uses in either the allocation for employment development at Fiddlers Ferry or Appleton/Stretton.

9.4 Notwithstanding the allocation of an area in excess of 136ha, there are no indications in PSV21 of how the Appleton site will be master planned. Part of the site is the subject of an undetermined planning application (the six/56 scheme) which proposes an unspecified mix of B8 and former B1(a) uses.

9.5 The preceding analysis of economic growth and housing supply has considered the overstated levels of growth,

9.6 It is not disputed that geographically, the strategic position of Warrington makes the area an attractive location for logistics development, but the principal purpose of the plan should be to manage this growth against a background of the wider public interest and other material planning considerations. Sustainable development is about balancing the economic, social and environmental objectives – not about predicating the entire approach of the Plan on one of those objectives. The fact that even at this stage of the local plan process, applications for planning permission are or have been in place for the majority of the employment allocation proposed for South Warrington is a demonstration of how demand for development needs to be managed and not sanctioned purely on the basis that it will result in growth.

9.7 Should the employment land at Appleton Thorn come to be allocated through this plan making process it would seem likely to come forward early in the plan period, prior to any infrastructure improvements. These improvements are necessary to enable connectivity to appropriate sources of labour. Without them the impact on the highway network would be highly detrimental. The wider highway network required to effectively accommodate large scale additional freight movements.

9.8 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.

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9.9 This is considered by the Borough Council to outweigh presumptions against the release of Green Belt land, even where its own advisors suggest that Green Belt objectives and purposes are strongly met. Ecological and landscape appraisal is weak and understated in order to weigh in favour of 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.

9.10 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.

9.11 In refusing to grant planning permission for this development the Secretary of State concluded that economic development was insufficient harm to the function and purpose of the Green Belt.

9.12 Paragraph 141 of the NPPF notes that exceptional circumstances need to justify changes to the Green Belt boundary require the strategic policy making authority to demonstrate that it has examined all other options for meeting identified need for the development.



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9.13 There is a two stage test, firstly demonstrating need and secondly demonstrating that need cannot be accommodated elsewhere

9.14 The submission of a further application (Six/56) on the remaining part of the land identified as a proposed allocation, demonstrates the seemingly unlimited attraction of Warrington as a location for logistics development but 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.

9.15 It is the contention of the SWP that in this case need is confused with developer pressure brought about by speculative acquisition of land and the attraction of development of largely unconstrained green field sites.

9.16 The second leg of the test of paragraph 141 elates to the full exploration of all other options. Irrespective of

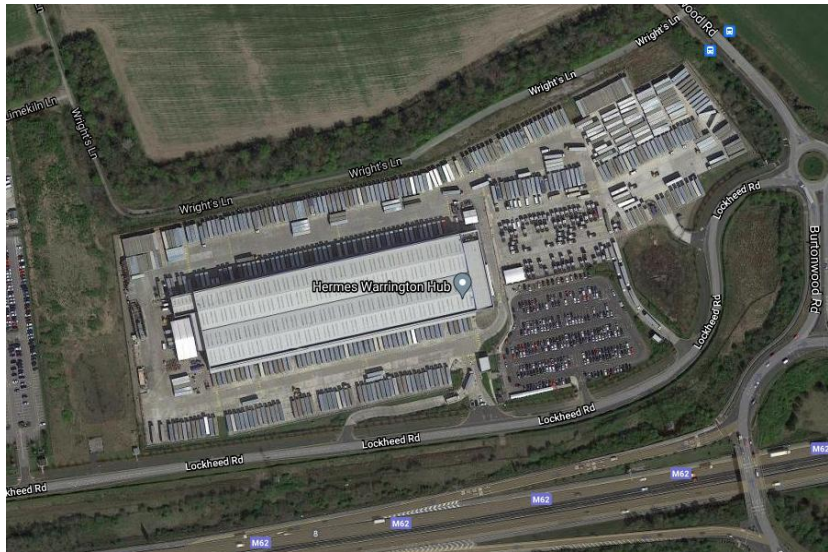
conclusions relating to need it is considered that this part of the test is not met.

9.17 Neither the PSV or background documents provide any clear assessment of alternative provision (which is both a specific requirement of NPPG para 141, and a general requirement for Plans to be sound) . There is no consideration of alternative brown field locations. With the exception of the extension of the Omega site into St Helens there is no apparent consideration of the scope for logistics operations to be developed in neighbouring authorities. Given the scale of the South Warrington Employment site it will operate at least at a regional if not a national level.

9.18 Observation of existing operations, including those in South Warrington will show that there are large areas of distribution centres used to store trailers and in some

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cases tractor units ready for use in periods of peak demand. This especially applies to large logistics specialists requiring flexibility to meet the demands of major customers. The photograph shows a site at Omega. The use of large areas of Green Belt to park lorries does not create the exceptional circumstances required to justify Green Belt release.



9.19 Paragraph 142 of the NPPF requires that review of Green Belt should promote sustainable patterns of development. Development should be channelled to urban areas. Whilst the South Warrington Employment site close to a motorway junction it lacks any other characteristics of a sustainable location.

### Key challenges as to Soundness \_ Employment land

*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 level of benefit – economic or otherwise which accrues from the release of Green Belt does not provide for the exceptional circumstances required by the NPPF Para 140*

*The release of Green Belt for development at the scale proposed is not justified.*

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

### 10 Green Belt

#### 10.1 Paragraph 140 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 amendments to those boundaries may be made through non-strategic policies including neighbourhood plans".*

10.2 The Green Belt in South Warrington has not changed in extent or been subjected to any development of significance since previous consultations.

10.3 The PSV2021 does however change the nature and location of Green Belt release in South Warrington removing land which was formerly part of proposed Garden Suburb and land to the west of Lymm. Additional take of Green Belt land is proposed at Thelwall Heys and changes are proposed on land to the south of Stretton Road in Stretton.

Both versions of the Submission Draft draw heavily on Green Belt assessment carried out by ARUP. The assessment notes at length an approach and justification for review of the Green Belt on the basis of housing need, whilst stating that its purpose is to appraise the

effectiveness of the Green Belt against current policy objectives and acknowledge Green Belt functions. This suggests that the starting position of the Green Belt review was predicated on the ability of housing need to 'trump' Green Belt – when in fact the Review should have been concerned with the intrinsic qualities and properties of the various areas of Green Belt regardless of any external pressures on it.

10.4 The approach to Green Belt appraisal raises the following areas of concern

- 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. There is a danger that any loss of a smaller parcel would have an unassessed detrimental effect on the coherent whole of the Green Belt. The so called threat of a 'death of by a thousand cuts' recognised by Mr Justice Sullivan in R (Heath and Hampstead Society) v Camden LBC [2007] EWHC 977 (Admin)

- It is necessary to understand the South Warrington Green Belt in terms of the function and purposes served by that area of Green Belt. The approach

adopted in the assessment breaks the Green Belt into small parcels and would enable a conclusion that development should be allowed to continue up to any point where a durable boundary with the Green Belt can be established.

- The approach 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 insetting 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 ARUP appraisal accepts that consideration should be given to the heritage value of the town centre and

Lymm conservation areas. Consistency should require application of the same approach to conservation area designation in Thelwall, Grappenhall, Stockton Heath, Walton and Moore. The historic value of all these conservation areas is heavily dependent on setting provided by the Green Belt and there is no basis for distinguishing them in heritage terms.

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

10.6 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 and to review these against the key issues and development

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pressures which impact on the current function of the Green Belt.

10.7 It is worthy of note that with the exception of Winwick, none of the settlements north of the town have designated heritage value which Green Belt designation might justifiably be designed to protect. This approach contrasts that in South Warrington, where an abundance of heritage assets are ignored.

10.8 As a reflection of its New Town Status, the urban area of Warrington expanded rapidly, expanding out into its previous rural hinterland in all directions. Expansion and development was based in part on short trips to neighbourhood centres but otherwise total reliance on car based transportation. Urban form, highway infrastructure, landscape and settlement patterns were all based on use of the private car. A series of largely unconnected

neighbourhoods was created, often largely self contained and unrelated to the town centre. Residents of these areas were as likely to utilise shopping and recreational facilities in Merseyside and Gtr Manchester as in Warrington Town Centre. Employment relied as much on inward migration from neighbouring settlements as on the indigenous workforce. The town centre under performed in terms of expected retail function for a town with a 200k plus population. The ARUP report notes the lack of positive impact of New Town related development on the inner areas of Warrington. Problems were compounded as the New Town designation left parcels of land undeveloped and in some cases an absence of clarity over planning status as various government organisations assumed some but not always all, of the powers originally sitting with the Development Corporation and Commission for the New

Towns. Even more significantly, key elements of infrastructure envisaged as essential elements of the New Town Master Plan were not delivered.

10.9 A legacy of neighbourhoods dependant on car use, unconnected with each other or the town centre, not surprisingly resulted in a complete *volte face* in the 1990's as the focus of the Borough Local Plan, then the UDP and finally the 2014 Local Plan Core Strategy sought to apply policy, including Green Belt policy, which supported regeneration and the focus of growth within the inner urban areas. Some success was achieved as development addressed derelict and redundant sites within the urban area – to some extent reflecting Government Policy in the mid 2000's and directives enabling resistance to Greenfield development.

10.10 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 their 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.



10.11 The detail of the Green Belt appraisal submitted within the evidence base presented with the Submission Draft, attracts criticism notwithstanding any subsequent consideration of any justification for its release.

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

10.13 Detail assessment of the impact of development on the purposes and function of the Green Belt will be assessed as policy relating to site allocations is considered in a later section of this document. In general terms it is considered that the assessment of the current contribution of designated Green Belt in South Warrington is understated in the Arup assessment and therefore within PSV21.

10.14 The importance of the Green Belt in the Walton area is recognised in terms of the risk of merger with Moore and developed areas Runcorn within Halton. It is noted that Halton BC raised objection to the 2017 PDO on this basis.

10.15 The selective assessment of which historic areas should be considered in the context of Green Belt purpose is apparent in the case of Grappenhall and Thelwall and Walton. The assessment ignores the setting of some of the most historic parts of the Borough which would be significantly altered as a result of encroachment of development and a change to the semi-rural setting of Grappenhall.

10.16 The assessment ignores the impact of the Bridgewater Canal corridor as a sound and logical boundary to the urban area on the south side of

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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 with long established, 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. The release of land undermines this principle to the considerable detriment to the character and appearance of the area.

10.17 No account is taken of the importance of the topography of the area proposed to be occupied by the SEWUE. 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 Heys

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 historic cores 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.

10.18 The proposals map is presented in such a way so as to understate the impact of development proposed and permitted on Appleton Thorn and Stretton. The Green Belt boundary is shifted south effectively using the M56 to define the southern edge. Gaps between Appleton

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Thorn and the employment allocation/existing Stretton industrial estate and the proposed SEWUE will not be legible. A ribbon of effectively continuous development will run from the junction 21 of the M6 to junction 10 of the M56.

10.19 In refusing to grant planning permission for a distribution centre at Barleycastle Lane Appleton, the Secretary of State agreed with his Inspector on the following issues relating to the location of the site within the Green Belt. (APP/M0655/W/19/3222603 & APP/M0655/V/20/3253083)

- the proposal site makes a strong contribution to safeguarding the countryside from encroachment.
- it makes a strong contribution to fulfilling the fundamental aim of the Green Belt in protecting the openness of the Green Belt.

- the site makes a moderate contribution to assisting in urban regeneration.
- the proposed development would represent a clear encroachment into the countryside and considers it would give rise to significant harm in terms of Green Belt Purpose
- the construction of this very large building and its associated vehicular activity would have a very significant impact on the spatial aspect of openness.
- very large buildings would have an appreciable adverse visual impact on openness, particularly when seen from Barleycastle Lane, and the view across the site would be dramatically transformed from a relatively flat, open undeveloped, area, into

an intensively developed area housing a very large building and an appreciable number of vehicles.

- visual harm to the openness of the Green Belt would be severe.

10.20 It is contended that the severe and significant harm noted in that case provides a measure against which the impact of the much larger change to Green Belt now proposed should be measured.

Key Challenges as to Soundness – Green Belt

*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 SEWUE and SEW Employment Area 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 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 the town centre as a product of, or as 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.*

*The ARUP assessment fails to fully consider the purpose of the Green Belt in protecting the setting of historic settlements.*

### 11 Infrastructure

11.1 Warrington is unique. Whilst settlements were initially focused on a crossing point of the Mersey in Latchford, the later industrial town development on the northern side of the River. Development on the south of the side of the Mersey increased as the 18<sup>th</sup> Century Bridgewater Canal and the late 19<sup>th</sup> Century Manchester Ship Canal partitioned the area. Crossings reflective of demand at the time and using contemporary technology were placed across the two canals. This leaves a legacy of humped backed bridges and underpasses across the Bridgewater; three swing bridges and a fixed high level bridge across the MSC. The Manchester Ship Canal Company (Peel Holdings) has absolute and legal control over the Ship

Canal bridges. The position established in 1890 remains unaltered.

11.2 This situation has been influential in the scale and form of development which has taken place in South Warrington. The New Town could not deliver the necessary infrastructure in order for development in South Warrington to evolve in the same way as North Warrington.

11.3 The Submission Draft ignores the lack of connectivity between the two parts of the town and its centre. It continues to depend on Victorian structures and to assume that the swing bridges will never swing or require maintenance. Experience demonstrates how a hot summer will bring the challenges of expansion of structures and the inability to close a bridge once opened.

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11.4 The population of South Warrington is consequently tempted to look elsewhere to work, shop and spend leisure time. (Taxi firms specifically caution customers on their inability to guarantee transport to Warrington's town centre stations to meet specifically timed train when travelling from South of the Ship Canal).

11.5 The scale and form of the development proposed in South Warrington is acknowledged as resulting in increased trips by all transport modes. [Submission Draft 7.2.1] There is clear acceptance of additional pressures on a failing network including highway infrastructure.

11.6 In highlighting concern over infrastructure the SWP is aware of the representations to the Plan and to the proposed Local Transport Plan by RSWF, which highlight in greater depth concerns over the approach to transport infrastructure.

11.7 The advantage of presenting the 2019 PSV alongside LTP4 consultation has been lost. The adoption of the LTP4 anticipated a different set of allocations and development proposals to the development schemes now proposed.

11.8 The PSV19 and related evidence base, the emerging Local Transport Plan (LTP4) paint a picture of the existing highway network across Warrington. The evidence base has now shifted to the Infrastructure Delivery Plan 2021.

11.9 The IDP notes that all of the main development areas require extensive infrastructure to support their development. The Council has identified the strategic infrastructure requirements of these allocations - over and above standard on-site infrastructure and S106 planning obligations - and included these in the Viability Assessment as a per dwelling cost.

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11.10 It is noted in PSV21 that at a broad Borough-wide level Warrington can accommodate the levels of development proposed by the Proposed Submission Version Local Plan (2021) as long as a comprehensive approach is taken to the provision of infrastructure, particularly on the larger development sites. The SWP would challenge this assumption on the basis that infrastructure proposals cannot provide for the impact of new development and resolve existing issues.

11.11 The PSV perpetuates 40 years of development with no regard to changing circumstances.

11.12 The IDP notes that in order to co-ordinate this approach the Council aims:

- To encourage investment in and improvement of existing infrastructure.

- To work in partnership with internal and external stakeholders to ensure the timely and co-ordinated provision of high quality infrastructure that supports future growth.
- To continue to assess the infrastructure needs and requirements which will support growth in the Borough through the IDP.
- To monitor and review the IDP on a regular basis to ensure that future infrastructure needs are considered and updated

11.13 It is the contention of the SWP that even the start of development of the scale proposed, particularly in South Warrington, without an absolute and clear commitment to the funding and the delivery of infrastructure would be disastrous, compounding existing



problems of congestion, air quality, and showing a lack of consideration of climate change.

11.14 The IDP is fundamentally flawed in three ways.

11.15 Firstly, the massive cost of delivering development on strategic sites is based on developer derived funding based on the delivery of development beyond the plan period. For the SEWUE funding of infrastructure is based on the delivery 4200, suggesting either an expectation that more than the 2400 dwellings proposed will be built within the plan period or alternatively that infrastructure will not funded/delivered until the end of the plan period or beyond. This is fundamentally inconsistent with the effective criterion of soundness which requires a Plan to be deliverable over the Plan Period.

11.16 Secondly, given recognition that existing infrastructure fails to meet current requirements, new

development must be supported by investment in strategic infrastructure at commencement of the development process rather than on completion.

11.17 Thirdly, the detailed schedules relating to the cost and delivery of infrastructure is inconsistent the delivery schedule identified as necessity within LTP4.

11.18 There is no indication in the schedule attached to the IDP as to how and when additional crossings to the Bridgewater Canal and the Manchester Ship Canal can be delivered. References to mass transit systems specifically noted in LTP4, are not covered in any detail in the IDP.

### Transport Infrastructure - Road

11.19 Modelling of the transport infrastructure by AECOM [Transport Model Testing of the WBC Local Plan -

31 August 2021] – provides three scenarios reflecting development proposals and infrastructure provision.

- Scenario 1 - This scenario considers all the developments (land use changes) outlined in Chapter 3 but with only committed highway infrastructure included.
- Scenario 2 - As Scenario 1 plus a number of additional highway infrastructure schemes that are required to enable the proposed growth to occur in a number of locations. The additional schemes include the proposed Western Link Road.
- Scenario 3 - As Scenario 2 plus 2 policy interventions identified in the approved LTP4 but not yet committed

11.20 At 5.17 The AECOM assessment notes that additional interventions are still required over the plan

period as a result of existing network conditions or the impact of development. The report also notes that requirements are determined by a model based on 2400 dwellings in the SEWUE.

11.21 This conclusion seems to contradict the IDP which requires development beyond the plan period to fund the infrastructure requirements of development.

11.22 There would appear to be a number of inconsistencies between the AECOM assessment; LTP4 and the IDP. LTP4 was presented as aspiring to deliver a mass transit system by the end of the plan period as part of the expectation of ensuring that new developments would be served by sustainable non car based transport modes, with a transformational modal shift away from car use. The 2021 PSV includes provisions for and safeguarding of a route to cross the Ship Canal. This is not referenced as

being deliverable during the plan period in the IDP. The PSV refers to a new crossing of the Bridgewater Canal which is not addressed in any part of the submitted evidence base.

11.23 The AECOM appraisal concludes that additional development can only be accommodated with the implementation of the full package of transport improvements presented in scenario 2 – including the Western Link Road.

11.24 Given appraisal of the IDP, indicative costings and methods of delivery it is considered that there is considerable risk that new development will take place without capacity to deliver essential infrastructure.

11.25 There is no reference in the ARUP appraisal to issues arising from the opening of the swing bridges across the Manchester Ship Canal and possible

consequences of increased traffic to serve development in Salford via the Canal.

11.26 The proposed transport infrastructure improvements appear to ensure strong and robust connections via upgraded highways onto the A49 and A50 and onto the M56 and M6. There is no indication as to how issues with existing barriers and areas prone to congestion on routes heading north into the town centre will be managed. There are no improvements proposed to the junction of the A49 and the A56 through Stockton Heath. There are no indications of improvements to the junction of the A56 with Lumbrook Road – or connection with a proposed second high level crossing.

11.27 There are no indications as to how additional traffic flows produced by the development can be accommodated through the already heavily congested

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Latchford one way system routing the A50 via its junction with the B5156 Station Road and the A5061 into the town centre.

11.28 In combination these arrangements would appear to make it easier to leave Warrington to the south onto the motorway network and discouraging of journeys to the north into the town centre. This appears to directly contradict policy objective W3 - *To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.*

11.29 The Plan and evidence base demonstrate little apparent knowledge or awareness of the extent of proposed use of the Ship Canal. The nature of the

development of the Canal means that the operator has a legal right to move vessels through the crossings. The Council has no legal means of control over the timing and frequency of bridge openings.

11.30 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 SEWUE is 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.

11.31 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

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would draw traffic through Stockton Heath and Walton from the proposed new developments.

11.32 The Western Link would also provide access to residential and employment related uses on the Warrington Waterfront. The main route into this area would be via the proposed Western Link and thence onto the A56 at Walton from where access can be gained to junction 11 of the M56. New streams of commercial traffic would be drawn onto the already congested A56.

11.33 It would be appropriate for the evidence base on highway infrastructure to consider the impact of the Centre Park Link Road on the local highway network, congestion now caused at the junction of the new road with the A5060 Chester Road and the junction of the new road with the A5061 Wilson Patten Street.

11.34 In each case the impact of developments proposed for South Warrington will have a clear, significant and adverse impact on existing communities in 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.

11.35 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 makes no attempt to define "adequate". It is clear that the existing trip base is not adequately served. Traffic flows at key points on the network are severely constrained. For example-

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

11.36 Congestion and delays at these points today, already provides demonstration of the need for major improvements to infrastructure provision prior to any additional development taking place. Town Centre congestion is presented as a reason for business to look to business park and out of centre locations. The solution to this is not localised improvement, but improvements which

address wider impacts comprehensively, across the whole network, including the provision of a deliverable and workable new crossing of the Manchester Ship Canal.

11.37 A major barrier to this approach is the means of funding. The business case for the Western Link demonstrates that it is the development proposed which creates potential funding for infrastructure improvements. In that case prudential borrowing by the Council will ultimately be supported through business rates, New Homes Bonus and CIL/S106. This is not a sustainable approach given uncertainties over costs, uncertainty over the pace of development and the planning process for the delivery of infrastructure.

11.38 Changes to the plan has reduced the scale of development previously proposed which would have accessed the Western Link Road. Less development will

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reduce developer contributions, New Homes Bonus and contribution through planning obligations. Appendix 13 of the Cushman and Wakefield Report August 2021 Emerging Local Plan Viability Assessment indicates contribution through Section 106 Agreements for off-site transportation works is zero.

11.39 The Western Link Road is a concept which has been in gestation for the best part of a decade. Within the 2019 PSV it was presented as a viable proposal to provide a solution to existing levels of congestion, particularly within the town centre. The Link also provided appropriate capacity within the network to serve new development at Port Warrington and Warrington Commercial Park. Yet now it is being suggested that both these developments are excluded from the Plan as the Western Link would not have capacity to serve these and the remaining

developments – Warrington Waterfront, without issues at the northern and southern junctions of the Link.

11.40 This effectively accepts that the highway justification for the Western Link and related development in PSV 2019 was wrong. This at the very least erodes confidence in the justification for and functionality of the Western Link as currently proposed.

11.41 None of the background papers submitted with the PSV 2021 provide indication of the viability of the Western Link particularly in the changed circumstances of the development to which it was previously inextricably linked. Submissions made with the latest PSV imply modification to previous schemes with little or no reference to impact on cost, viability of deliverability.

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

- 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)

11.43 The Manchester Ship Canal is crossed at 5 points, although Moore Swing Bridge provides access to a limited area.

- Moore Swing Bridge (partly in Halton)

- Chester Road Swing Bridge (A56) (note this bridge has a narrower carriageway than others, with HGVs unable to pass on the bridge and a single footpath.)
- Stockton Heath Swing Bridge (A49)
- Latchford High Level Bridge
- Latchford Swing Bridge (A50)
- Thelwall Viaduct (M6)

With the exception of the Thelwall Viaduct, all of the Ship Canal crossings in Warrington are the original Victorian structures which although skilfully and robustly constructed, are well into their second century of operation.

11.44 The Bridgewater Canal is crossed by main roads at:

- Walton (A56 Chester Road)
- Stockton Heath (A49 London Road)



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- Grappenhall (A50 Knutsford Road)
- Thelwall Viaduct (M56)
- Lymm (A56 Booths Hill Lane)

11.45 The Bridgewater Canal is also crossed at various points through routes using original 18<sup>th</sup> 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)

11.46 Proposals to develop land for 4200 houses and to allocate 116ha of land for employment purposes show limited realistic appraisal of the ability of the existing highway network to accommodate this scale of development.

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

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11.48 The proposed Western Link is poorly located, being too far west to merit use by the majority of South Warrington based residents or businesses.

11.49 The largest single allocation of the Submission Draft – the SEWUE - would be linked to the existing highway network by three already congested main roads. The A49, the A56 and the A50. Principal points of access to these routes would rely on narrow bridges and a single carriage tunnel to cross the Bridgewater Canal, each constructed in the 18<sup>th</sup> Century.

11.50 Submissions relating to the SEWUE illustrate the concept of a link road from the A50 close to junction 20 of the M6 to the A49 close to junction 10 of the M56. The PSV describes the route as a new strategic link connecting the allocation site with the A49 and easing congestion at the Cat & Lion junction. Additional connections will be

made to the A49 at Lyons Lane and Longwood Road junctions as well as a link to the A50 to the east, via a new connection to Grappenhall Lane.

11.51 The rationale and justification for the precise layout of this route is unclear from the submitted evidence base. This is particularly the case with connection with the A49 at Stretton.

11.52 There are major concerns over the acceptability and impact of this new route.

11.53 Submissions made with the PSV evidence base make it difficult to distinguish costed projects in the IDP which make up this route and to assess its total cost.

11.54 The PSV notes that the new link road will also contribute to wider transport mitigation measures to offset the impact on Junctions 10 of the M56 and Junction 20 of the M6, in agreement with Highways England. There

is no clear explanation of what is meant by this statement or how this off set of impact will be secured.

11.55 The PSV also notes that delivery of a scheme to relieve congestion at the existing Cat & Lion junction of the A49 is essential to enable to development. Within the plethora of data submitted with the PSV it is difficult to fully understand how this junction works and how it is justified.

11.56 It is accepted that the existing Cat & Lion junction poses issues. This commonly arises from obstruction of south bound traffic on the A49 turning right to travel west on Hatton Lane the B5356.

11.57 The creation of a junction of the new link road and the A49 further south of the Cat Lion is proposed. The PSV and background submissions do not fully describe how this link and specifically the new junction will both resolve

any existing issue of congestion and adequately serve the scale of development proposed.

11.58 As it stands the new junction will serve at least 4200 new homes and will attract traffic from the proposed South East Warrington Employment Area, including HGV's, seeking to access the M56 to travel west. South bound traffic will still be delayed on the A49, twice instead of once, at the Cat and Lion Junction and then again at the new junction. Traffic entering this junction will obviously be of a much greater volume than that which emerges from the B5356 westbound at the Cat and Lion junction.

11.59 The SWP is aware of consideration by other groups making representations to the plan of a preferred routing of the link road as new arm onto junction 10 of the M56. Notwithstanding consideration of this matter in previous representations to earlier phases of consultation there is

no formal appraisal of this option in the submission now presented by the LPA.

11.60 It is ultimately the case that whilst alteration to junctions on the A49 may enable new development to be accommodated without overloading of those specific junctions – the proposals do not alter the fact that all of new development proposed in south Warrington would have to utilise the existing highway network with all the constraints caused by limited crossings of the 3 waterways.

11.61 The only reference to any solution to this issue is the protection of a route for a high level bridge over the Manchester Ship Canal- a project which is not presented as a complete proposal, has no full costing or programme. The scheme would have major impact on Latchford and the wards of Latchford East and Fairfield and Howley, with

traffic from any new crossing deposited onto the already congested local highway network.

11.62 The failure of proposed highway interventions to deal with the impact of new development and to remedy existing issues on the highway network in south Warrington, is completely at odds with objectives of the plan to increased accessibility to the town centre and to ensure that it provides a viable focus for commercial, retail and leisure activity for the Borough.

### Transport Infrastructure - Rail

11.63 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. Currently no logistics site in the Borough has rail access and all rely entirely on road freight.

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11.64 It is worthy of note that the Council has objected to the rail connected Parkside Distribution Centre in St Helen's on the basis of impact on the Green Belt and the local highway network.

11.65 The Submission Draft is positive towards the provision of rail infrastructure and services and the provision of rail facilities. This is somewhat ironic as the Council has consistently raised issue over HS2. The Council has missed opportunities to make Warrington the hub of HS2 connections with Manchester and Liverpool and Transpennine routes and continues to raise issues with the Golborne link which effectively bypasses Warrington as part of the main route north to Glasgow and south to Birmingham and London.

11.66 Objection to the Golborne route is somewhat naive as it fails to understand the existing constraints of the

West Coast Mainline from Acton Bridge to Haydock and the scope for improved local services and freight routing which HS2 is intended to facilitate.

11.67 The electrification of the Liverpool to Manchester via the Earlestown route was the harbinger of the removal of direct TransPennine routes via Warrington Central. This highly significant event and the fact that regional connections across the north of England, has not been considered in the future significance of Warrington as a strategic transport hub, and consequent misplaced assumptions about this position as stimulation for growth.

11.68 It is curious as to why allocations for major development are located at the furthest points from rail connectivity. The return on investment in a new Warrington West railway station would be optimised with further development which would have easy access to the

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Manchester – Liverpool Cheshire Lines route, in North West Warrington. No consideration is given to the potential to increase the use of Padgate, Birchwood and Glazebrook Stations through related development in closure proximity to these points of access to the rail network. The Rainhill route from Liverpool to Manchester provides access to North Warrington via Earlestown and Newton le Willows which is largely ignored in the Plan. Sections of this route lie within the Borough and could support new development through easy access to the rail network.

11.69 Much has been made of the high level of rail connectivity into Warrington in PSV 21, links to HS2 and the prospect of a Warrington stop on the Northern Powerhouse rail route between Liverpool and Manchester (HS3). The potential for such a link is included in

justification for the high levels of growth predicted. There is no certainty that the link would be delivered within the plan period. Routing is unknown except possibly for that part of HS2 from Manchester Piccadilly to the Manchester Airport – Golborne Link junction. This would suggest a route passing to the south of Warrington before crossing the Mersey and extending west into Liverpool. If this route connects into the West Coast Main Line at Warrington Bank Quay a line would have to cross parts of the South Warrington Green Belt and the Warrington Waterfront compromising current proposals and allocations.

11.70 Northern Powerhouse Rail documentation suggests that a link to Warrington might consist of a Warrington South Parkway Station presumably south of Walton Goods Yard sidings where it would provide for interchange with

the WCML and the Chester and North Wales routes and also serve Daresbury Science Park. This would all take place in areas of Green Belt already under pressure through the allocations of the Submission Draft.

11.71 The Plan relies on transformational infrastructure provision including the development of mass transit systems and a shift away from the private car. With the exception of the protection of disused rail corridors in policy INF1, there is no consideration as to how the route from Arpley Meadows to Fiddlers Ferry and onwards to Widnes and Ditton route might provide a tangible and sustainable route for the occupiers of new development in West Warrington into the town centre. An example of broad aspirations not being followed up by realistic and viable means of delivering policy objectives.

11.72 The Plan fails to show any clear understanding of the complex interrelationships between development and infrastructure and misses the opportunity to properly plan for the implications of such development. The envisaged infrastructure, even if it were deliverable, only comes into place in the years following the end of the Plan period.

11.73 The proposals fail to demonstrate understanding of the employment and travel to work patterns in Warrington. They cater for a change in the role of the Town Centre which is not proven to be viable and unlikely to affect current patterns of travel to work in the city centres adjoining the Borough. 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

11.74 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.

11.75 The suggestion of proposals to relocate or redevelop the current Warrington Hospital site should be at the core of the Plan. This would establish a comprehensive and considered background to a town where such high levels of growth are proposed. There is limited evidence that the Submission Draft has been positively planned in this regard, it fails to meet the social objectives for achieving sustainable development, fails to show timely and effective engagement with infrastructure

providers and is clearly contrary to the provisions of section 8 of the NPPF in this regard.

#### Key Challenges as to Soundness - Infrastructure

*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 to deliver the required infrastructure to properly serve the development allocations is doubted. There is insufficient certainty over the timely 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.*

*This is a critical and fundamental concern. A significant proportion of the Plan is based on the 'unlocking' ability of infrastructure. However this infrastructure is predicated on funding derived from development which is often not due to come forward until after the Plan Period. This inherent contradict places in serious doubt the ability of the Plan to deliver much of the proposed employment and housing over the Plan Period.*

*This central failure of the Plan to be deliverable, and thus not be effective and therefore not sound, is not adequately recognised or addressed by the Council. This is*

*deeply concerning and alone necessitates a re-think in the overarching strategy of the Plan before it can be submitted.*

*The Plan makes numerous assumptions and predictions about the impact of proposed rail infrastructure. There is no certainty or evidence to support the delivery of such provision within the Plan period. If certainty emerges, the Plan as presented would seem likely to conflict with many of the potential options for connection to HS2 and the location of Northern Powerhouse Rail.*

### 12 Air Quality

12.1 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.

12.2 The proposals contained within the proposed development plan increase the risk of issues for air quality.

12.3 The Air Quality Management Study produced to support the PSV2019 has not been updated. A consultation version of an Air Quality Action Plan was produced in February 2021 but has not as yet been adopted.

12.4 There does not appear to any consideration of the closure of Fiddlers Ferry Power Station.

12.5 DEFRA figures are quoted in WBC Air Quality Annual Status Report 2020 dated June 2020. This report notes improvement in levels of NO<sub>2</sub> Nitrogen Dioxide levels but an increase in levels of particulate matter PM<sub>2.5</sub> and PM<sub>10</sub>. The source of pollution is recognised as road transport. The report notes that growth plans for the Borough emphasise the need for long term action plans.

12.6 The same DEFRA figures indicate that every Borough in Greater Manchester fails to WHO standards. The routes into Manchester from Warrington through Salford and Trafford are specifically recognised as exceeding limits for NO<sub>2</sub> up to 4 times the suggested WHO limit of 10µg/m<sup>3</sup>. Figures in the EDNA illustrate the clear relationship between place of residence in Warrington and place work in Greater Manchester. There is an undeniable link between housing supply in Warrington and the

Greater Manchester employment market and therefore with traffic entering parts of the Manchester highway network susceptible to issues with air quality.

12.7 The location of Warrington outside the Greater Manchester Combined Authority reduces scope for public transport initiatives to affect such travel patterns.

12.8 As it stands those plans are not an apparent element of a PSV totally focused on road base transport.

12.9 The 2019 AQMS notes that traffic levels predicted in the plan are based on the Multi-modal Transport Model, the veracity of which is questioned above. If, as suspected, the model anticipates traffic flows which assume no closure of the Ship Canal swing bridges, it follows that the assessment of impact of development on air quality is similarly flawed.

12.10 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.

12.11 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 NO<sub>2</sub> and harmful particulates by 2040. This is of course outside the Plan period and it seems likely that significant parts of the development would 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.

12.12 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 will increase as a result of the development proposed. The impact of closures of the swing bridges on congestion, and therefore on air quality, receives no consideration in the report.

12.13 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 public thoroughfares and shopping streets – London Road, Stockton Heath, for example. The study does not take into account increases in pedestrian and cycle routes, a key element of the modal shift away from car transport and therefore, the increasing number of people exposed to traffic pollution.

12.14 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 PM<sub>2.5</sub> 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 85µg/m<sup>3</sup>, levels which are considered dangerous by the WHO.

12.15 A recent article exploring the best places to live describes Stockton Heath as “snuggled in glorious countryside and with bags of charm, Stockton Heath is the perfect self-contained Cheshire village”. This does seem slightly inconsistent with the decision of the Parish Council to purchase its own air quality monitoring equipment, such has been the concern over air quality in the village.

12.16 It is unfortunate that the monitoring equip has only been use for a year with the untypical road use across that time. Even with the considerable reduction in traffic over the monitoring period the daily average for PM<sub>2.5</sub> was measured at 8.47µg/m<sup>3</sup> against a WHO recommended maximum of 10µg/m<sup>3</sup>.

12.17 DfT figures [Provisional Road Traffic Estimates – Great Britain July 2020- June 2021 all motor traffic decreased by 5.5% across that period with car and lorry traffic reduced by more than 8% compared with the year ending June 2020.

12.18 A return to normal traffic levels plus the impact of additional traffic generated by the proposed development would inevitably result in increased pollution and particulate levels, beyond the level recommended by WHO.

12.19 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 of, 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.

12.20 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 SEWUE and the South East Warrington Employment Area would seem to undermine this objective, exposing residents to higher levels of NO<sub>2</sub> and PM2.5 with consequent issues for morbidity and premature mortality.

12.21 Section 4 of ENV8 references the need to manage impact of transport created by new development the Manchester Mosses Special Area of Conservation which is near to the M62 between junctions 10 and 12. There is little explanation of the detail of impact which needs to be avoided but it is difficult to see how the scale of development proposed in South Warrington can ever be consistent with this policy objective.

12.22 The Air Quality Action Plan for Warrington relies entirely on achieving the modal shift and wider provisions of LTP4. As noted throughout this document it is the view of SWP the totality of LTP4 is undeliverable. That document itself has no expectation of infrastructure being delivered within the plan period.

*Key Challenges as to Soundness – Air Quality*

*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 to 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. There is no certainty that air quality will improve as development comes forward.*

*A growth focused plan based largely on logistics as a key driver is directly opposed 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] proposals for a housing development were refused 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 186 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.*



### 13 Environment

13.1 The Plan continues to be 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 SEWUE, Thelwall 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.

13.2 Much of the proposed development is located close 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 160000 vehicles per day, with consequent high levels of noise and a continuous background of traffic.

13.3 Similarly parts of the proposed SEWUE will be experience a poor quality environment through exposure to the constant traffic noise using the M56. DfT figures suggest that The M56 at junction 10 carries in excess of 120000 vehicles per day. Significant areas of proposed development allocations are within areas notated within the current development plan as being subject to road noise.

13.4 The Councils website shows areas of the Borough affected by noise from road use. It is not surprising to see

that much of the areas either side of the M6 and M56 motorway corridors are included within such areas. The A49, A50 and A56 are also referenced albeit with much reduced areas of impact.

13.5 Much of SEWUE is covered, together sites at Thelwall Heys and sites on the western side of Lymm

13.6 Existing areas of South Warrington benefit from the current relationship of residential areas with open countryside and space accessible for recreational purposes. The value of the Bridgewater Canal corridor, Walton Gardens, The Dingle, Grappenhall Heyes, Lymm Dam and other accessible areas of open space to the whole population of Warrington, has become apparent throughout the course of the pandemic. The scale and form of development proposed diminishes this key

characteristic of the town and a key feature of its attraction to business and residents.

13.7 Development as proposed within site allocations would severely diminish this character and sense of place. It will simply promote extension of existing suburban areas.

13.8 The NPPF 2021 reflects an increased level of reference to the importance of the quality of development as well as quantity. This is reflected in national design guidance which has emerged alongside the latest version of the Framework.

13.9 There is no confidence that the approach presented to the development of allocated sites within the PSV will achieve the objectives of paragraph 130 of the NPPF.

- Addition to the overall quality of the area
- Are visually attractive and effectively landscaped

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- Are sympathetic to local character and landscape setting
- Promote health and well being

13.10 The proposed development sites will result in encroachment into areas of open countryside on the edge of settlements particularly Lymm, Stretton and Thelwall. Sites are located at gateways into these settlements disrupting logical boundaries and changing the character of these places.

13.11 The Grappenhall Village Conservation Area will no longer benefit from a rural setting but will be dominated by new development to the south and west.

### Flood Risk

13.12 The evidence base includes an update of the Strategic Flood Risk Assessment submitted with the PSV19.

This reflects changes to Environment Agency data on flood risk assessment.

13.13 The SFRA covers a wide range of complex issues. It notes however that parts of Warrington's surface water drainage systems are Victorian in origin. Natural water courses have been affected by the construction of the Manchester Ship Canal and before that the Bridgewater Canal. Natural water courses have commonly been culverted particularly where they pass under the Bridgewater Canal.

13.14 The construction of large numbers of houses and business premises in South Warrington has increased discharges and the reduced permeable surfaces for rainwater infiltration.

13.15 Climate change is accepted as leading to heavier and longer periods of rain.

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13.16 The SFRA includes data which identifies communities at risk of surface water flooding. This includes sites in Grappenhall, Thelwall, Statham and Heatley.

13.17 Environment Agency and WBC data shows a series of watercourses running from the slopes on the southern side of the Mersey Valley, discharging often via culvert into the Manchester Ship Canal. These watercourses cross the eastern part of the SEWUE, and bisects the Thelwall Heys proposed allocation. The whole area is pepper potted with sites known to be subject to surface water flooding. It should be the case that the evidence base to the plan includes information to show the clear understanding of the hydrological function of Morris Brook and other watercourses running into the built up areas of Grappenhall and Thelwall.

13.18 The SWP is concerned at the absence of any authoritative assessment of the hydrology of South Warrington. The SFRA notes that it does not account for local circumstances, but only sites within recognised flood zones.

13.19 The SFRA recommends that site development must take account of those local circumstances. Sustainable drainage systems, surface water retention and other engineered solutions will be necessary. Observation suggests that the points at which existing water courses enter culverts are increasingly likely to prove inadequate as run off rates increase.

13.20 At the very least this issue must be assessed prior any existing green field site is covered by buildings and hard surfacing. It must also be recognised that this issue representations an additional development cost which is

not accounted for in any infrastructure development requirements.

13.21 The recommendations of the SFRA are generally reflected in the expectations of the development in the SEWUE. It is considered however that the approach to this issue should not be left to the consideration of individual applications for planning permission. Drainage for foul and surface water must be considered comprehensively to assess the suitability of sites in South Warrington for development.

Key Challenges as to Soundness - Environment

*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.*

*The SEWUE is particularly poorly located in environmental terms as a future receptor of road noise and poor air quality from nearby highway infrastructure and existing commercial premises.*

### 14 Ecology

14.1 Warrington has significant ecological resource which merits more than local recognition. Woolston Eyes, Rixton Clay Pits, Risley Moss and Holcroft Moss are designated as SSSIs with the mosses designated as Special Areas of Conservation. Sites within Thelwall and Lymm are immediately adjacent to the boundary of consultation zones for the Woolston Eyes SSSI.

14.2 It is noted below that development sites do not have to be located close to these protected areas to cause unacceptable impact, through additional pollution through extra traffic movements.

14.3 Local nature reserves and local wildlife sites as designated in the Local Plan Core Strategy are scattered across the South Warrington area.

14.4 Much of the area to be given over to development in the SEWUE, at Thelwall 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 retained. This not only provides a characterful and distinct backdrop to the urban area but provides 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.

14.5 The HRA [AECOM March 2019] presented in support of the Submission Draft has been update in August 2021. Again it has to be questioned how proposals included in the PSV can have been properly assessed

against documents published days before the publication of the PSV for consideration by the Cabinet.

14.6 The HRA still identifies potentially significant effect on the Rixton Clay Pits and Manchester Mosses Special Areas of Conservation resulting from development at the previously proposed development in South Warrington, 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. As noted above 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.

14.7 As with other elements of the plan there are assumptions that the Borough can exercise control over the scale and nature vehicle trips to ensure acceptable levels of air quality and thereby impact on areas of environment sensitivity.

14.8 Section 4.58 of the HRA flags “discussion “between the Council and AECOM to manage air quality and impact on ecology. This largely reflects the untenable and undeliverable provisions of LTP4 and curiously provisions for development producing HGV movements to be restricted to 200 movements per day or that all vehicles are Euro6 compliant. There is no explanation as to how this standard will be applied or what it does for levels of emissions compared to current rates. This restriction bears consideration in a context of the previous proposals to development part of the MD6 employment site (Stobart) which of itself was expected to result in 768 daily movements. There is no rationality in the identification of the need to manage development producing air pollution which impacts on ecology and the controls proposed.

14.9 It is accepted that development plan proposals and allocations cannot analyse detailed aspects of the ecological value of individual sites. Allocated land in South Warrington does not include internationally or nationally protected ecological assets.

14.10 Areas included in the allocations in South Warrington are almost entirely undeveloped green field sites. These sites include areas known to provide habitats for protected species. The loss of these areas of undeveloped land can only diminish biodiversity across Warrington.



Key Challenges as to Soundness - Ecology

*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.*

### 15 Character and Distinctiveness

15.1 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 Statement Warrington BC Submission Draft Local Plan March 2021]

15.2 It is the submission of the SWP that the plan completely fails to achieve this objective. The Plan has a wholly negative impact on the South of Warrington. The

setting of the conservation areas of Grappenhall and Thelwall are adversely affected. It is worth noting that scenes from these conservation areas are commonly used in literature promoting the Borough.

15.3 A series of advisory leaflets for conservation areas were produced by the Borough Council in 2000 which outline the rationale for conservation area status of the conservation areas in 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.

15.4 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 from a range of public viewpoints across the area. Views across this landscape will be lost as a consequence of development proposed in SEWUE.

15.5 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 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, although they have no formal heritage or other designation such as is the case with villages in South Warrington.

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

*Key Challenges as to Soundness – Character and  
distinctiveness*

*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.*

*The development which would result from the plan is not  
sustainable in terms of paragraph 8 of the NPPF. The plan  
is not sound in terms of paragraph 16a of the Framework*

### 16 Climate Change

16.1 The Royal Town Planning Institute (RTPI) and the Town & Country Planning Association (TCPA) have produced a report – The Climate Crisis – A Guide for Local Authorities on Planning for Climate Change.

16.2 *“Effective strategic and local development plans are vital tools in delivering a range of key solutions to the climate crisis. This section sets out a logical set of steps – from evidence-gathering to suggested policy approaches – for both mitigation and adaptation. It indicates key sources of evidence and explains how future patterns of spatial development can be designed to radically reduce carbon emissions – through, for example, the use of decentralised renewable energy systems and reductions in the need to travel. Given the critical overarching need for the planning system to support the delivery of the Sixth*

*Carbon Budget and the net-zero target, only viable development that is ‘net-zero consistent’ should be included in plan policy.*

*New developments must also take the full range of adaptation factors into account. For example, good site selection at the plan-making stage is crucial. This section sets out criteria which can be used to assess suitability when allocating sites, considering, for example, the type of building and the intensity of use.*

*Climate change is a strategic priority for national policy across all parts of the UK. Action on climate change should be an integral part of the culture of plan-making and must be embedded and integrated into policy preparation. Only by treating climate change related issues as central to policy formulation will a local planning authority have effectively discharged its legal obligations. hhhh*

16.3 Paragraph 153 of the NPPF notes that: 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'

16.4 Taken as a whole, the NPPF requires local planning authorities to have a holistic understanding of climate adaptation, ranging from flood risk to increased temperatures and heat stress. Local development plans

should play a full part in building community resilience to a changing climate.

16.5 Warrington BC declared a Climate Change Emergency in 2019. The priority areas for an action plan to address the emergency, included the aspiration of reducing car reliance and traffic congestion. Investment has been made in new solar farms in other parts of the Country but little obvious investment locally.

16.6 There is no clear evidence that the PSV includes policies which direct the form of development to ensure energy efficiency. There are for example no references to sustainability and energy efficiency for the major development allocations within the plan.

16.7 Whilst it is clearly the contention of the SWP that the scale of development proposed is unacceptable, the size of the SEWUE, Fiddlers Ferry and the SEW

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employment area prevent scope for imaginative thinking which minimises impact. District heating systems, different sources of energy, waste water recovery should be at the heart of policies relating to the development of these sites.

16.8 It is of concern to the SWP that the proposals for development in South Warrington do not place climate change at the centre of the plan. It is through the Local Plan process that local authorities (especially those who have declared a Climate Change Emergency) can make real change to address the increasing challenges of climate change. A failure to do so would be contrary to the 'pro-active' requirement of NPPF 153 and be a highly damaging lost opportunity. The plan is focus on the facilitation of economic benefit. The obvious negative impacts of development are considered in terms of how

they might be marginally mitigated, not prevented. The plan does not focus on remediation of brownfield, previously developed sites, but concentrates the majority of development on green field, previously undeveloped sites, dependant on car borne travel.

16.9 Even if it is accepted that by some means the development in South Warrington can be justified, requirements for the form and structure of development. There is limited expectation for development to meet exemplar standards of energy efficiency. There is no consideration of the opportunity for large scale development of land in public ownership to consider the use of district heating systems or other means of ensuring development results in the lowest levels of emissions and highest levels of energy efficiency.

Key Challenges as to Soundness \_ Climate Change

*The PSV proposes development at a large scale, on previously undeveloped land. This runs counter to any aspiration to reduce carbon output.*

*Paragraph 8c sets an objective of sustainable development to mitigate and adapt to climate change. The requirement for strategic policies to meet this objective is set out in paragraph 20d of the Framework.*

*Further the failure to address the requirements of the Framework results in the PSV failing the test of soundness at paragraph 35d of the Framework.*



### 17 Sustainability

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

17.2 There are three overarching objectives underpinning the achievement of sustainability

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

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

17.4 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.

17.5 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 proposed for development is not in the right places to serve the needs of residents of the Borough and there is a clear disconnect between ambitious levels of development and the co-ordination of the delivery of infrastructure.

17.6 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.

17.7 The Plan proposes development which will have a dramatic and devastating impact on the environment. The proposals undermine biodiversity in promoting green field development. Alternative strategies could better exploit regeneration and make 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 - Sustainability*

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

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

### 18 Comment on allocated sites in South Warrington

#### MD2 South East Warrington Urban Extension

18.1 The impact of the large scale urban extension is extensively appraised in the analysis of the plan a described above.

18.2 In summary it is considered that there are no exceptional circumstances which would justify the release of Green Belt at the scale proposed.

#### MD5 Thelwall Heys

18.3 The allocation of the Thelwall Heys site has been considered in the preparation of various plans in the past including the Warrington Borough Local Plan and the Warrington Unitary Development Plan.

18.4 Whilst the WBLP reached an advanced stage of preparation it was not adopted as Warrington became a unitary authority. The UDP was adopted in Jan 2006 rejected proposals to allocate the site for a safeguarded housing land. The Inspector preferred instead to place it in Green Belt.

18.5 In so doing issues relating to housing supply were prominent in consideration, but a number of other matters were assessed. It was concluded that the site was not required to meet housing supply requirements, but a number of constraints and considerations were taken into account.

18.6 The contribution of the site to the purpose and function of the Green Belt was considered. The Inspector's report from April 2005 reached a number of conclusions which remain of relevance to the current PSV.

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- On urban regeneration grounds alone there is ample justification for not disturbing the Green Belt boundary.
- The site fulfils Green Belt purposes in preventing sprawl and encroachment into the open countryside.
- The Inspector considered a national, regional and local policy context which supported the use of tightly drawn Green Belt boundaries to achieve regeneration aims. Policy also sought to ensure that the recreation potential of the urban edge was enhanced.
- “The site does fulfil Green Belt purposes that look to prevent urban sprawl. It is worthy of protection from inappropriate development and should be included within the Green Belt”

- Existing boundaries are strong and robust

18.7 Contrary to this assessment – appraisal of this site in the background papers now presented suggests that development of this site is not sprawl as it is contained by strong, permanent boundaries and constitutes rounding off. There is some acceptance that development would result in encroachment. This allows a conclusion that the Green Belt contribution of the Thelwall Heys site is weak.

18.8 This clearly contradicts the legitimate appraisal of the UDP Inspector. The site makes a strong contribution to the Green Belt which supports its function and purpose. No explanation has been given for this glaring contradiction – and the SWP cannot understand what logic could support a change in position.

18.9 The Transpennine Trail – which follows the route of the former Warrington to Altrincham railway is a clear and

robust boundary. Expansion of development to the south of the TPT would be located on a prominent gateway site into the built up area which is highly visible from both the A56 and the A50 and from recreational routes on the Bridgewater Canal footpath and the TPT. This high level of accessibility distinguishes Thelwall Heys from other parts of the wider Green Belt. The site contributes to both the strategic and visual impact of the Green Belt.

18.10 Submissions made relating to this allocation lack any detail, notably about access to the site. This represents a broad brush approach that Inspector's have found unsatisfactory in examinations across the country as it does not constitute a clear and unambiguous policy as required by NPPF para 16. Logically access to the site would be onto the A50 Knutsford Road presumably close to the current junction with Cliff Lane and Bellhouse Lane.

A junction to serve development of the scale proposed would itself result in encroachment and sprawl – yet due to a lack of precision this has not been properly addressed..

18.11 The site contains land which is currently classified as Grade 2 and Grade 3. It can be considered as the best and most versatile agricultural land. Development would be contrary to the provisions of paragraph 174 of the NPPF.

18.12 The Heritage Impact Assessment for the site notes that development will have significant impact on the setting Thelwall Heys House a Grade 2 Listed Building. Views of the house will be impacted by any surrounding development, with new housing intruding on the setting of the asset. It is recommended that a swathe of land around the building is protected from development.

18.13 It is very difficult to extract information from the evidence base supporting the application to assist in understanding the scale of the site. No part of the PSV notes the area of the site. The 2020 SHLAA suggests an area of 21.6ha with a nett developable area of 16.23ha. There is no indication as to how this figure has been reached. The SHLAA site is different to the allocation indicated in PSV21.

18.14 It is not clear as to whether the constraints pertaining to suggested measures contained within the HIA have been taken into account.

18.15 There is no reference in the PSV21 to the two watercourses which cross the site. These are designated as main rivers with consequent easements to protect access. Designation does not reflect flood risk relating to these water courses. The WBC mapping system shows parts of

the site to be at high and intermediate risk of surface water flooding.

### MD6 South East Warrington Employment Area

18.16 The value of the Green Belt in the area covered by MD6 has been considered in the appeal decision referenced above.

18.17 All parties accepted that the site made a significant contribution to the function and purpose of the Green Belt. The site makes a strong contribution to safeguarding from encroachment due to its strong openness and predominantly non-durable boundaries. The site has a strong role in preventing encroachment and, accordingly, makes a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 137 of the Framework, in protecting the openness of the Green Belt.

It was also agreed that that the site makes a contribution to assisting in urban regeneration.

18.18 The proposed allocation is considerable larger than the previously considered appeal site. It fills an area which is highly prominent from major roads and public footpaths which cross the site. Impact on openness is apparent and obvious.

18.19 Impact must be considered in the context of questions over the availability of alternative and more sustainably located sites.

### OS4 – Lymm (Pool Lane/Warrington Road)

18.20 As with consideration of the Thelwall Heys site Pool Lane and Warrington Road have been considered as possible housing allocations when previous versions of the development plan have been considered.

18.21 It has been concluded that the site is clearly open and rural in character and protection would serve the Green Belt purpose of safeguarding the countryside from encroachment and to some extent assist urban regeneration.

18.22 The appraisal provided as a background to the PSV21 irrationally disagrees with this longstanding assessment that the site contributes to the function and purpose of the Green Belt.

18.23 It is suggested in the ARUP assessment of August 2021 that there would be no sprawl resulting from the development of the site because it is not connected to the main built up area of Warrington. The allocation presents land at Pool Lane and south of Warrington Road as a single allocation. Appraisal in the evidence base fails to

properly assess the cumulative impact of the release of both sites from the Green Belt.

18.24 Reference to improvement to environmental quality of the remaining Green Belt is obtuse and vague. If Green Belt land is to be released there should be a clear requirement in the plan to show how this can be achieved on or in the locality of the specific allocation. The PSV is not compliant with the provisions and expectations of paragraph 145 of the Framework.

18.25 As with other smaller allocations there is no indication of how the site will be accessed. The creation of new access to the highway, to contemporary standards and suitable to serve 170 dwellings, will of itself harm the character and appearance and function of Green Belt on Warrington Road.

18.26 The site is dominated the Thelwall Viaduct to the west. The whole of the proposed allocation is affected by noise generated by traffic on the motorway. Noise levels are exacerbated by the elevation of the viaduct above surrounding land.

18.27 The site is in close proximity to the motorway air quality management area.

18.28 In combination, the current high level contribution to the function and purpose of the Green Belt, the poor quality residential location cause the proposed allocation to lack logic and soundness

### OS5 – Lymm (Rushgreen Road)

18.29 The proposed allocation of land at Rushgreen Road is poorly presented and appears to give limited consideration to the development of adjoining land under planning permission 2017/31816.



18.30 Description of the site in the August 2021 Green Belt Assessment is inconsistent with the land proposed for allocation in PSV21 which does not reference the land now development but currently in the designated Green Belt.

18.31 Description of the site within the assessment references existing development much of which does not benefit from planning permission. Commentary on cumulative impact in the appraisal is meaningless. The appraisal references the need to reinforce the eastern boundary of the site and suggests that this is the subject of consideration in OS7. It is not.

18.32 A significant proportion of the site on which development was permitted under 2017/31816 is retained as public open space. This enhances the role of Green Belt and openness adjacent to the Bridgewater Canal corridor

and should be reflected in the position of the Green Belt boundary of any allocation.

Key challenges as to soundness – Allocations

*The site allocations relevant to South Warrington are poorly considered.*

*Without exception the allocations result in significant harm to the function and purpose of the Green Belt. This is particularly the case when the cumulative impact of development is considered.*

*There is no clarity over the manner in which the release of sites for allocation will be compensated through the delivery*

*of increased access and environmental quality of remaining Green Belt.*

*In all cases the selected sites exhibit a range of constraints which are not given appropriate consideration in terms of securing sustainable development. Development proposals are biased towards securing economic objectives of sustainable development are a blind to social and environmental objectives as identified within the Framework.*

### 19 Deliverability

19.1 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

19.2 The rationale behind the expected level of growth and the scale of housing development to support that growth is assessed in sections 7 and 8 above.

19.3 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 historically 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.

19.4 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.

19.5 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.

19.6 The as yet unfunded projects identified in the IDP which relate to the SEWUE appear to total in excess of £191mm. (This figure appears to omit the costs of a new leisure centre, telecoms installations or the costs of a new crossing of the Ship Canal). This equates approximately to £45k per dwelling based on the development of 4200 dwellings. As it stands it is very difficult to see how the proposals can viably support the infrastructure requirements.

19.7 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

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requirement to deliver infrastructure on programme and alongside any proposed development, that the Council must provide clarity on the cost analysis of infrastructure provision – as clarity will be required by the Secretary of State if this Plan were to be submitted for examination.

19.8 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 – Deliverability

*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 lack clarity and certainty necessary to commit to the allocation of such levels of development.*

*The PSV21 notes that delivery is dependent on the completion of development proposed to take place beyond the planned period.*

*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 necessary certainty over costs. The IDP does not include consideration of all development costs, including sustainable utility provision, affordable housing, the high levels of energy efficiency demanded by plan policy. It is impossible to fully assess and to interrogate the viability of passing these costs onto developers through planning obligations.*

*The LTP4 was presented in parallel to the Submission Draft of so as to demonstrate the level of infrastructure needed to support the development proposed. The LTP has not been updated to reflect changing circumstances. It contains flaws and unsubstantiated assumptions which bring into doubt the ability to match development with infrastructure provision.*

Policy/Statement number	Policy Objective	Comment
Warrington's prosperity and Vibrancy  2.1.24 (p11)	Omega....has created in excess of 8000 new jobs.	<p><i>This claim is unsupported by any evidential material. It is considered that many of the jobs are not new but relocated from elsewhere as existing business consolidated operations in single large units.</i></p> <p><i>There is evidence that the Covid pandemic has prompted further rationalisation particularly in those parts of the logistics sector related to hospitality</i></p>
Warrington's prosperity and Vibrancy  2.1.29 (p12)	Warrington Town Centre Supplementary Planning Document and Town Centre Masterplan	<p><i>Neither of these documents can be afforded significant weight. The SPD does not supplement the current development plan but anticipates adoption of a later plan.</i></p> <p><i>The Masterplan has not been sanctioned under any formal planning process</i></p>
Vision - Warrington 2037	" The intersection of the two new major national rail routes, HS2 and Northern Powerhouse Rail in Warrington will further enhance the Town's	<p><i>This is speculative with no certainty as to direct linkage to HS2 and no specific proposals for Northern Powerhouse rail</i></p> <p><i>Proposals to link a east- west route to Bank Quay station would be</i></p>

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4 (p20)	strategic connectivity"	<i>practically difficult with wide issues in terms of impact on the Green Belt, ecology, environment</i>
6 (p21)	" 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 15</i>
W1(p24)	"...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(p24)	"To ensure revised Green Belt boundaries maintain the permanence of the Green Belt in the long term"	<i>See section 8</i>
W3(p24)	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 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(p24)	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</i>



		<i>infrastructure will be insufficient to meet the increased demand created by new development</i>
W5(p24)	"...reinforces character and distinctiveness...whilst protecting, enhancing and embracing the Borough's historic, cultural, built and natural assets".	<i>Character and distinctiveness will be considerably diminished. Historic and cultural assets will be harmed.</i>
3.3.18	<p>..other options have been given detailed consideration during the preparation of the local plan, but none performed as well as the chosen spatial strategy</p> <ul style="list-style-type: none"> <li>• Dispersed pattern makes it harder to deliver required infrastructure</li> <li>• Development to the west leads to issues of meeting Warrington and Widnes and issues with social and physical infrastructure</li> <li>• Extension to the north impacts on A49 and junction 9 of M62. Impact of the character of Winwick and a designated battle ground</li> <li>• Eastward extension would have ecological impact and sterilise mineral</li> </ul>	<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 a 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 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</i></p>

	<p>reserves.</p>	<p><i>mitigation needed to enable development to take place. 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 the most deprived wards in the Borough.</i></p> <p><i>This analysis is poor and incomplete.</i></p>
<p>3.3.28 (p32)</p>	<p>The Western Link road will connect the A56 to A57 and contribute to addressing congestion in Warrington.</p>	<p><i>It is not clear 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, 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</i></p>

		<p><i>by the proposed Garden Suburb.</i></p> <p><i>The business case for the route relied heavily on the scope to access land on Warrington Waterfront and Port Warrington for development, both now deleted from the plan. 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>Previous reference PSV2019 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>This link is still shown on the proposals map but is not longer referenced in the section of the plan relating to Infrastructure needs to support Warrington’s growth.</i></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 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</i></p>

		<p><i>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 &amp; 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>
3.3.32(p32)	A stepped trajectory is required over the plan period to ensure timely delivery of infrastructure	<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 questioned.</i></p>
Exceptional Circumstances – 3.4.7 – 3.4.10	<p>Summarised</p> <ul style="list-style-type: none"> <li>• Meeting Warrington’s development needs</li> <li>• Creating new sustainable communities which support infrastructure delivery</li> <li>• Parallel with development of brown field</li> <li>• SEWUE provides comprehensive and sustainable approach to meeting development need</li> </ul>	<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 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</i></p>

		<p><i>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 focused on the private car 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 and concentration of development proposed is only justified on the basis that it delivers a level of developer return which supports the funding of additional infrastructure.</i></p>
<p>Failing to meet development needs – 3.4.11 – 3.4.16</p>	<p>Options to reduce development needs will reduce ability to plan for growth and comprehensive infrastructure delivery.</p> <p>Increased inward commuting to work, leading to</p>	<p><i>The Plan should not blindly aspire to accommodating growth at any cost. The Plan should support the appropriate management of growth so 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</i></p>

	<p>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>potentially makes it worse by adding traffic to different points on the network.</i></p> <p><i>Travel to work patterns in Warrington are complex. It is unclear 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 and wider employment opportunities. The proposed SWUE 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 local 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 than the proposals of the Submission Draft suggest.</i></p>
<p>DEV1 (3)</p>	<p>SEWUE – min 4200 homes with 2400 in plan period plus with consent.</p> <p>Thelwall Heys minimum 310</p>	<p><i>See comment on site allocations above.</i></p> <p><i>The policy should be framed so as limit the number of dwellings to that which can be accommodated by infrastructure provision – numbers should be maximum rather than minimum.</i></p> <p><i>Development within the plan period should be limited to 2400. Further development of 1800 dwellings is stated as unnecessary until</i></p>

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		<i>beyond the end of the plan period</i>
DEV1 (7) Housing trajectory	2021-2025 678 dpa 2025-2038 870 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>
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>
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	Adequate provision of sites against GTAA	<i>Impact of recent approvals relative to need. The plan needs to be</i>

and Travelling Show person provision		<i>clear in terms of location and avoid imposing this form of development in an unplanned manner</i>
DEV4	136 ha of employment in SEW employment Area.  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	<i>The development of a logistics based employment use in the Garden Suburb is poorly considered.</i>  <i>As with other development involving freight movement, development which fails to provide scope for access to rail or water should be resisted.</i>  <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>
4.2.6	Recognising special locational needs	
4.2.12	Assessing future employment land requirements	
DEV5 and 4.3.4	Retail and leisure needs	<i>Although titled retail and leisure policy DEV5 makes reference to service provision through a hierarchy of centres including neighbourhood hubs, which are not defined in the plan.</i>  <i>The Council consistently places emphasis on service provision through the establishment of neighbourhood hubs at Woolston,</i>



		<i>Orford Park and Gt Sankey. No such provision is highlighted for South Warrington.</i>
5.1.7	Capacity in adjoining areas	<p>It is considered that the Plan has not properly taken account of development proposals in the adjoining areas, proposed in respective local plans and within the GMSF.</p> <p>The GMSF agenda to focus development on existing areas of growth in South Manchester whilst promoting regeneration in North and East Manchester is inconsistent with approach to growth advocated in the Submission Draft.</p>
5.1.9	Development needs <u>and</u> aspirations	
5.1.12	Green Belt Assessment – has informed spatial strategy	<i>Green Belt Assessment is flawed and 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>

<p>TC1</p>	<p>Widening the role of the Town Centre</p> <p>Promotion of the town centre for office development</p> <p>Relies on transformation of Bank Quay railway station</p>	<p><i>Disconnect with key areas of growth and the town centre contradicts ambitions to strengthen viability and vitality.</i></p> <p><i>No indication of how jobs growth and particularly 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>
<p>INF1</p>	<p>Sustainable travel</p>	<p><i>See comments on Infrastructure above</i></p>

<p>INF2</p>	<p>Transport safeguarding</p> <p>A new or replacement high level crossing of the Manchester Ship Canal between Stockton Heath and Latchford.</p> <p>Western Link Road</p>	<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> <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>
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<p>INF3</p>	<p>Utilities and Telecommunications</p> <p>Proposed growth will require an increase in waste water treatment capacity. Discussion has 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>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 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><i>The plan makes no reference to the use of sustainable methods of dealing with foul or surface water</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</p>	<p><i>The proposed SEWUE 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>hubs</p> <p>New Hospital Site</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 &amp;Co in consultation with the commissioners and providers of health care. This is especially so as the existing hospital site represents a major redevelopment opportunity within the urban area which would support a range of objectives relating to the regeneration of the town.</i></p> <p><i>The Council has failed to utilise powers which are available to facilitate and prompt development</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 SEWUE 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 SEW Employment Area and the SEWUE Suburb is</i></p>

		<p><i>the ability of larger schemes to fund and 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 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.</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. It is uncertain whether viability appraisals have covered the complete costs of infrastructure provision. Costs have in any case been shared with potential development beyond the plan period.</i></p>
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		<i>If high levels of viability are to be secured, the form, character and tenure of housing provision is likely to be affected.</i>
DC1	Warrington's Places	<p><i>The list of visitor attractions in Warrington does not reflect key assets in South Warrington</i></p> <ul style="list-style-type: none"> <li>• <i>Trans-Pennine Trail</i></li> <li>• <i>The Bridgewater Canal Corridor</i></li> <li>• <i>Grappenhall Walled Garden</i></li> <li>• <i>Grappenhall Village</i></li> <li>• <i>Lymm Village and Lymm Dam</i></li> </ul> <p><i>These attractions draw visitors from across the Borough and beyond. They contribute significantly to the character of the town and its constituent parts. The recognition of such locations is critical if the stated visions for Warrington are to be delivered.</i></p> <p><i>These sites are amongst those which have been vital to the health and wellbeing of the towns' residents during the pandemic. The function of these places needs to be recognised and protected.</i></p>
DC2	Historic Environment	<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>

		<i>Allocations will undermine the significance of a range of heritage assets</i>
DC4	Ecology	<p><i>The plan fails to reference the decision of the Council to call an Ecological Emergency across the Borough in 2020. Policy relates entirely to the protection of existing, recognised ecological sites. It does not provide clear guidance as to how biodiversity will be enhanced just how existing sites will be protected. There is no strategy to guide such enhancement, simply generic statements.</i></p> <p><i>The plan proposes to remove substantial areas of south Warrington from the Green Belt. These areas are predominantly undeveloped, green field sites. They represent environmental and ecological assets which are simply handed over for development, with no clear consideration as to how if they must be developed, they become exemplar models for the enhancement of biodiversity NPPF 174.</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. Master plans are indicative of a failure to understand the context in which the developments would be delivered.</i></p> <p><i>The Plan makes no clear provision for proposals to build on any inherent character and quality which already exists. Revisions to the NPPF in 2021 have changed the emphasis to be given to the creation</i></p>



		<p><i>of well designed places – NPPF Section 12. Plans should set out a clear design vision – design policies should reflect local aspirations.</i></p> <p><i>DC6 is effectively unchanged from previous versions of the PSV.</i></p> <p><i>References in the “Why we have taken this approach” back ground to policy to latest guidance are not reflected in the policy itself.</i></p>
ENV8	Environmental and Amenity Protection	<p><i>Air Quality – provision is made within ENV8 to resist development which has an adverse impact on air quality, but in proposing the development contained within the Plan, with the consequent impact on congestion and air quality, the Council effectively undermines the purpose and objective of this policy.</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</i></p>

		<p><i>adjacent to the main arterial routes crossing the Borough including motorways.</i></p> <p><i>Parts of the SEWUE abut existing and proposed areas of employment use and the highway network which accesses these sites. The design of the 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 are contradicted by the development plan allocations.</i></p>
MD2	South East Warrington Urban Extension	<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</i></p>

		<p><i>England permitted sites and therefore the time frame for the provision of infrastructure outlined at point 14. There is concern that the dependence on the SEWUE to bring forward development in the early to mid stages of the plan period is inconsistent with the ability to ensure funding and consider programming.</i></p> <p><i>The considerable dependence on 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 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 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>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</i></p>
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		<p><i>Belt boundary mean? (point 26)</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 will be 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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MD5	Thelwall Heys	<i>See references above</i>
OS4	Lymm Pool Lane and Warrington Road	
OS5	Lymm Rushgreen Road	

MD6	South East Warrington Employment Area	<i>See references above</i>
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### 21 Duty to Cooperate/Community Consultation

21.1 The SWP have expressed concern over the approach to public engagement throughout the gestation of the Local Plan.

21.2 The PDO was poorly presented to the public. Ill considered plans appearing to indicate confirmed transport routes caused much angst to those potentially affected, including in some cases the failure of property transactions. The consultation process was poorly conducted, with the late addition of consultation events in the South of the Borough, where facilities and staff were overwhelmed by the sheer numbers of residents wishing to understand the nature of the proposals.

21.3 This situation was evidence of the lack of effective engagement with the public or representative bodies –

including the Parish Councils. The purpose and function of the PDO was misunderstood because it was so poorly presented. There was no effective discussion as to the expectations and requirements of the development plan with the people which it should be designed to serve.

21.4 The large number of representations submitted to the Council was a reflection of the poor quality of that process.

21.5 The SWP had hoped and expected that lessons would be learned from the PDO. It was expected that the Plan would be adjusted from one driven by a desire for growth at all costs.

21.6 After the PDO the Submission Draft was discussed with developers and landowners, as is clear from the submissions made when the Draft Plan was released. There was no effective engagement prior to issue of the

Submission Draft with public interest groups or statutory bodies mandated to support local, public interests. The Borough Council did not follow its own Statement of Community Involvement.

21.7 This problem was compounded as the Council conducted a comprehensive review of evidence and background documents to support the Submission Draft. Little, if any of this documentation was placed in the public domain before the issue of the Draft Plan as part of the Full Council decision making process. The evidence base was not placed as background papers to the report to Full Council. It seems likely that members making the decision to release the Submission Draft for consultation were aware of the evidence base. Many of the documents have an issue date of March 2019, giving rise to question over

the ability to properly incorporate their conclusions into a complex and lengthy development plan document.

21.8 The Submission Draft was placed in the public domain with no preamble.

21.9 The effectiveness of the consultation process has been weakened as a result, undermining the validity of the Draft Plan.



### 22 Conclusions

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

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

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

22.4 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 no 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 f 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

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- There is no need for development which will destroy the character and distinctiveness of Warrington 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.

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

22.6 At the heart of the SWP concern (although this concern then takes the many forms set out at length above) is that the entire strategy underpinning this Plan is

predicated on delivering high levels of economic growth. This is the foundation of the Plan from which all other policies flow from.

22.7 This foundation means that the Plan is inherently skewed towards delivering the economic objective of sustainable development to the detriment of the other objectives. This is not just an issue of soundness and compliance with the NPPF but also means the Plan is legally flawed due its failure to accord to s.39 of the Planning and Compulsory Purchase Act 2004.

22.8 This found also means that any issues or flaws with the economic evidence for the strategy will have a domino effect for the rest of the Plan. The SWP concerns (as set out in Sections 7 and 9) have knock on effects for the other elements of the Plan. There are other critical foundational principles such as infrastructure which is, on

examination, predicated on a few unpredictable factors which could lead to a bottleneck in terms of infrastructure delivery which would make considerable amounts of the Plan undeliverable in the Plan period.

22.9 The purpose of the SWP in producing this detailed document at this stage is to assist the Council by alerting them to these concerns and allowing them the opportunity to amend the Plan to address them.

22.10 The risk of not taking this approach has to be considered in terms of 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.