

## 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

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 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 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

- Lumb Brook Road underneath the Bridgewater Canal is already congested – without any additional infrastructure this junction will fail to operate effectively, if at all.
- Lymm Interchange Junction 20 – this major junction needs to see significant improvements to cope with all the additional traffic that this Local Plan will generate. The junction fails on a weekly basis to cope with the traffic already using it. The additional traffic generate from the proposed developments will completely overload the junction.
- Contradicts policy to enhance town centre
- 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.