

## Updated Local Plan Submission Version Consultation November 2021

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### Introduction

The legal framework within which the Local Plan has to be prepared is difficult for lay residents to follow and leaves too much scope for political mischief.

This plan is going to its final consultation and the examination in public with residents uncertain as to what aspects of the plan were at the discretion of the Local Planning Authority and what aspects are demanded by the laws surrounding the NPPF.

In particular the status of the objectively assessed Housing Need and Economic need figures has been placed in doubt. I believe that these are laid down by government and the LPA had no option but to deliver a plan that would deliver the minimum numbers calculated using the standard methodology including the 816 annual figure for the delivery of homes over the period 2021 – 2038.

However this puts into question the effectiveness of the plan as Warrington has never achieved a housing delivery target consistently at this level and it is not clear how the plan will achieve that.

There has also been dis-information circulating on the period the plan should cover. I accept that the 2021 – 2038 duration of the plan is the minimum allowed by the NPPF.

### Soundness

The tests of soundness demanded by the NPPF are not very helpful when consulting on the plan. *Soundness* is presented as a set of binary yes/no tests. For an ordinary person, rather than a lawyer, *soundness* is a continuum from a perfect plan with no flaws, to a completely unacceptable plan with no redeeming features. One hopes that a plan will be closer to the perfect end of the spectrum than the unacceptable.

However, this means that a plan may be legally *sound* but may not match, current and future, residents' wishes and aspirations. I fear that the current plan falls into that category.

Unlike other respondents I am not keen on getting involved in an arcane view of what constitutes *soundness* in relation to this plan. I am confident that officers have produced a plan which is legally

sound. However there are aspects of it which will not satisfy residents and alternatives, which may have been considered, and rejected, but without sufficient explanation are missing.

There are three specific policies that I want to comment on.

### **South East Warrington Urban Extension**

The proposal is an improvement on the Garden Suburb previously proposed, not least because the proposed housing number reduces from over 7900 to 2400 in the plan period and 4200 thereafter.

However the supporting proposal from Homes England and Miller Homes is very brief, and lacks the detail of the 100 page masterplan produced by Aecom for the Garden Suburb.

While committing to place making, there is little in the proposal to convince residents that what will result will be high quality places.

The proposal still releases some of the best quality green belt with the highest landscape value, not least because of its adjacency to the Bridgewater Canal and the very high quality landscape that makes up part of the Mersey Valley Timberland trail.

I fully support Our Green Warrington's submission which argues cogently that the Aecom option 4 along the southern part of the A50 would be a far less damaging area to develop.

The primary motivation for releasing the green belt for the SEWUE appears to be the fact that the land is owned by Homes England. Given that government ministers and the Prime Minister have stated in public their desire to save the green belt, it is not clear why a government agency is being given preference, over other land owners in south Warrington, when the use of their land would be less damaging than the SWUE.

### **Thelwall Heys**

The proposal to build on green belt at Thelwall Heys appears to be motivated almost entirely by the speed at which this site could be developed.

Given that the green belt here was confirmed as recently as 2006, it appears unfair to residents, and contrary to the endurance of the green belt, that the status of this site should be changed so soon.

Residents on Weaste Lane to the south of the site and in Thelwall to the north, as well as Environment Agency risk assessments, suggest that this site is surrounded by areas at risk of flooding and there is a possibility of the stream running through the site to flood. Residents want to see the flood risk for the site reassessed.

The site has particularly high grade agricultural land unlike other green-belt sites in the vicinity.

The Thelwall Heys release should be replaced by a less damaging green belt site, possibly further south on the A50.

### **South East Warrington Employment Area**

The principle of releasing this green belt as an employment area appears dubious on sustainability grounds. It is close to an already congested junction of the M6 and M56. Ideally it should remain

green belt and more easily accessible, and commutable, sites should be considered for employment use.

In particular the proposal to allocate the site to Distribution and Industrial use (B8 and B2) is unnecessarily damaging to the area.

I understand that the current market for logistics sites is buoyant and this, no doubt, is driving this proposal. However, previous experience in Warrington shows that the vagaries of the property market are such that such patterns often change quickly.

If it is essential to designate this land for employment use, it should be designated for Class E Commercial Business and Service use.

In particular, given the current levels of demand at Birchwood, it appears unsound to designate a site that is uniquely well located to become a Green Science Park, for logistics use. The site lies at the heart of the Cheshire and Warrington Science Corridor. It is within half an hour of two international airports, it is within three quarters of an hour of two world class universities. It lies on the edge of a relatively high income residential area with many technically and scientifically qualified residents. The site is almost uniquely well qualified to be a high technology science park, lying close to similar successful parks at Daresbury and Birchwood.

By contrast there will be stiff competition from Parkside in St Helens for logistics use, which will benefit from being a multi-modal site with rail access.

In short, if this green belt must be lost, it would be much better used as a Green Science Park, than a logistics site.

## **Conclusion**

The highly technical legal requirements of this consultation, as reflected in the on-line questionnaire, do not provide residents with the opportunity to have a final say on what could be done better in the Local Plan. My three observations here suggest three areas where modifying the plan would, in my opinion, improve the plan.

I would like to take this opportunity to commend the officers who have brought the plan to this stage for their professionalism and hard work.

I am aware that they have had to balance many conflicting requirements and pressures and have valiantly done their best to do so.

Weaknesses in the plan are largely down to the nature of the process and the conflicting demands, and are not the fault of officers delivering the government's messages.

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