



Groves Town

Planning LTD



**Stretton Parish Council**  
**Representations to the Submission Draft of the Warrington**  
**Borough Local Plan**

<b>GTP ref</b>	██████████
<b>Version</b>	V6
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### 1 Introduction

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

1.2 The Stretton Parish is significantly affected by allocations for development in South Warrington, particularly those relating to the proposed South East Warrington Urban Extension (SEWUE)

1.3 Stretton Parish Council is a member of the South Warrington Local Plan Working Group. Many of the issues covered in this representation are shared with the views of the SWP. The Parish Council reiterates support for the issues raised in the SWP representation, some which are repeated in this submission, but considers that the specific

impacts on Stretton and the residents and business represented by the Parish Council, demands specific comment.

1.4 The Council has made representations through the process of consultation over the Warrington Local Plan. Representations were 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. The Council 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.

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1.5 It remains the case 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, lacks viability and deliverability.

1.6 From the perspective of the Parish Council the basic premise of the plan 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 is 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.

1.7 The key presumption to this scenario is based on the continued logistics based growth is necessary and that the cost of extensive areas of Green Belt, consequent congestion, environmental harm, impact on Climate

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Change and the considerable risk of not only failing to provide for infrastructure needs created by the development, but also failing to “fix” existing issues, driving a widening equality gap across the Borough.

1.8 The plan continues to fail to meet the tests of soundness.

### 2 The Representation

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

- A portrait of Stretton
- 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

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

2.3 **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. It is considered reasonable to question how the content of that

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extensive range of documentation have been fully assessed in the production of the PSV

2.4 It is accepted that the Local Plan is a strategic document, although 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 securing development, tilting the outcome of policy allocations to developer rather than public interest.

2.5 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 (tri- secting) the town.

2.6 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]*

### 3 National Policy Context

#### Principles and sustainability

3.1 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]*

3.2 Relevant paragraphs of the Framework are summarised below.

3.3 *“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]*

3.4 *“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]*

### *3.5 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]*

*3.6 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;*

- *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 adaption.*

*[NPPF 2021 para 20]*

3.7 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]*

## 4 A Portrait of Stretton

4.1 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 Stretton and South Warrington, 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.

4.2 Stretton is a vastly historic rural village located in the South West part of Warrington borough. The settlement sits on a Roman Road running South to North. It is served by St Matthews Church, which was built in 1870, the associated junior school and nearby hotels. The village also has its own post office and medical centre and part of the community

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parkland facilities maintained by the Pewterspear Green Trust, fall within the parish boundary.

4.3 The domestic community is diverse with some properties dating back many years and others that were part of post-war redevelopment. New developments were undertaken as part of the Warrington New Town initiative and more recently the completed development at Pewterspear, with the construction of a further 180 properties.

4.4 The village has been twinned with Newtown, Delaware County, Pennsylvania since 12 November 1979. When the Township was built in 1681 one of the original settlers was Daniel Williamson, who originated from Stretton.

4.5 The village contains a site for travelling show-people in Lower Stretton and a permanent gypsy site in Stretton.

4.6 The village has an infrequent bus service. There is no rail or other mass transit facility in the village and residents rely

heavily upon car usage for their employment, schools and domestic needs.

4.7 The southern part of the Stretton came to be known as Lower Stretton apparently in the 1860's. The two parts of the settlement were divided in the 1970's when the M56 motorway was constructed.

4.8 Both parts of Stretton have a public house. In the case of Lower Stretton the Ring O'Bells was part of a village centre with a village shop. Only the pub remains. The Cat & Lion sits at a main junction within Stretton.

4.9 Mapping shows how the village has changed over time and how different in character it was in the past. This does not however justify development proposals which subsume Stretton with overdevelopment, major elements of infrastructure and remove any semblance of its rural origins and setting within open green space.

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4.10 More widely 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.

4.11 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.

4.12 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 any of formal planning policy context, with limited consultation and recognition of how proposals and policies within these documents need to be considered in the context of the Borough as a whole.

4.13 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 the Ship Canal or the River the key concerns remain unaltered.

4.14 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

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Warrington, but history of the area has resulted in the 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.

4.15 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 the related infrastructure which was intended to support the development then proposed.

4.16 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

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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.

4.17 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.

4.18 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.

4.19 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 first crossing point east of the estuary. Views north from these key gateways into the town and from the B5356 Stretton Road

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provide a vista across the town dominated by the spire of St Elphin's Parish Church.

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

4.21 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.

4.22 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

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roles. [Warrington Borough Council – Borough Profile 2015/ONS]

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

4.24 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 largely 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 has a distinct

similarity with the Master Plan. Such replication is troublesome given the desire 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.

4.25 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.

4.26 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 entrenched and not readily changed.



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4.27 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 which has never been in the Green Belt but on open green field sites within the Green Belt.

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

5.1 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.

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

5.3 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 PARISH COUNCIL as presented in previous representations.

5.4 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
- 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.

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- 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.

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- 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.

### 6 Growth

6.1 Whilst the concerns of the Parish Council relate to the very specific direct impacts on the settlement, development is driven by the aspiration for growth which underpins the PSV

6.2 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.

6.3 It is noted that most of the background papers for the PSV2 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 taken into account in

the production of other documents in the evidence base must be questioned.

6.4 It is noticeable that the Cheshire and Warrington LEP Strategic Economic Plan is less prominently referenced than previously.

6.5 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.

6.6 Critically for Warrington the Study amongst other issues highlights the following:

- The strong connections between economic activity in Warrington and activity in neighbouring areas, notably Cheshire East and Cheshire West, Greater Manchester and Liverpool, highlighting development identified in

the Greater Manchester Spatial Framework and the potential needs of the Port of Liverpool.

- How growth in Warrington is predicated by competition for a share of the wider economic development across the region.
- Competition for growth based on the Science and professional sectors in Halton, Cheshire and Manchester.
- Dependence on historic high levels of take up of employment land
- The 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.

6.7 The Parish Council 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 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 evidence of different assessments with different conclusions as to levels of growth produced at the point of production of the PDO.

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

6.9 It remains the contention that this approach is fundamentally flawed. Warrington has inevitably experienced higher than average rates in this regard as result of being able to deliver shovel ready development land at Birchwood and latterly Omega 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, 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.

6.10 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. 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.

6.11 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

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their control. It is however considered that in reality need is supply led. 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.

6.12 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.

6.13 Evidence produced at the appeal into the Stobart distribution centre as Appleton Thorn 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.

6.14 The justification for the release of land from the Green Belt is weak and based on unsubstantiated levels of growth.

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

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

6.17 The Strategic Economic Plan was produced by the LEP in 2017. 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.

6.18 The period since the inception of the SEP has been dynamic. 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.

6.19 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.

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

6.21 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 absence of analysis of competition to meet these needs from any statement of common ground is an issue of concern.

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

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

*There are contradictory assessments as to the expectations of growth especially at the point of production of the Preferred Developments Option. The 18 month period between the PDO consultation and the Submission Draft has seen the need for considerable modification in*

*previously predicted levels of growth, with limited alteration to the scale of development proposed.*

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

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

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

### 7 Housing Supply

7.1 As with consideration of issues relating to growth, the Parish Council is focused on protecting the residents and businesses it represents from specific local impacts. It is recognised however that these impacts are driven by suggested strategic needs for housing supply. It is contested that there is scope to review the levels of supply required and remove the pressures for the allocation of sites for development around Stretton.

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

7.3 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.

7.4 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.

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

7.6 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.

7.7 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.

7.8 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 17year 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.

7.9 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 built out rate necessary to secure require levels of delivery.

7.10 Paragraph 60 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.

7.11ONS 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.

7.12 In order for the PSV to the 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

7.13 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-for greater Warrington cannot be arithmetically assessed in a vacuum divorced from economic and demographic issues.

7.14 There is considerable risk that large scale addition of affordable housing will exacerbate rather than balance inequality across Warrington. Focus on regeneration

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would be lost and the improvement to infrastructure and service provision to less privileged parts of the Borough would be diminished rather than enhanced.

7.15 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.

7.16 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

7.17 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

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landowner and developers. The approach adopted by Warrington is inwardly focused and does not take account of the sub regional and regional position.

7.18 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.

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

7.20 The 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. It ignores historic levels of housing development and ignores decreasing predicted levels of population.

7.21 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.

7.22 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

and M56, it is naturally attractive to such uses, but in an increasingly competitive market, where 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.

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

7.24 The Council's 2020 Strategic Housing Land Availability Assessment includes at appendix 6 includes 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.

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

7.26 The HCA Employment Development Guide 2015 suggested 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.



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

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

7.29 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.

7.30 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.

7.31 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 and to assess historic patterns which influence

trajectories for historic and future development. The evidence base to the PSV

7.32 New Town Designation has been a major influence creating a supply of housing land beyond a scale which would be reasonable 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. The decision to release land on the previous employment allocation of the Omega development has influenced the ability to deliver high levels of supply. 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, such development has demonstrated the limited impact of such development on regeneration at the heart of the urban area. Government Directives in the 1990s and 2000's prompted developers to reassess their approach to development. 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

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development including apartments distorting the supply position across this period to a point that the Council introduced a moratorium on new housing developments.

7.33 As far as the Parish Council is concerned these questions over the validity of the approach taken to the position on housing supply inhibit the justification for development which has such an adverse impact on Stretton.

### Keys Challenges as to Soundness

*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 SEWUE require more in depth analysis as does the ability to secure higher densities in the urban area.*

### 8 Employment Land

8.1 The Parish Council expresses concern over the scale and location of allocations for employment related development a strategic level because of the local impact of the implementation of those strategic policies.

8.2 The largest single employment land allocation within the submission draft is within Appleton Parish but immediately abuts Stretton and impacts heavily on the wider South Warrington as whole. The Parish Council 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.

8.3 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.

8.4 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.

8.5 Notwithstanding the allocation of an area in excess of 136ha, there are no indications 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.

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

8.7 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. 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 should be managed and not sanctioned purely on the basis that it will result in growth.

8.8 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, particularly connectivity to appropriate sources of labour and the wider highway network required to effectively accommodate large scale additional freight movements.

8.9 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.

8.10 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

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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.

8.11 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.

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

8.13 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.

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

8.15 The submission of a further application on the remaining part of the land identified as a proposed allocation, validates the seemingly unlimited attraction of Warrington as a location for logistics development but

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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.

8.16 It is the contention of the Parish Council 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.

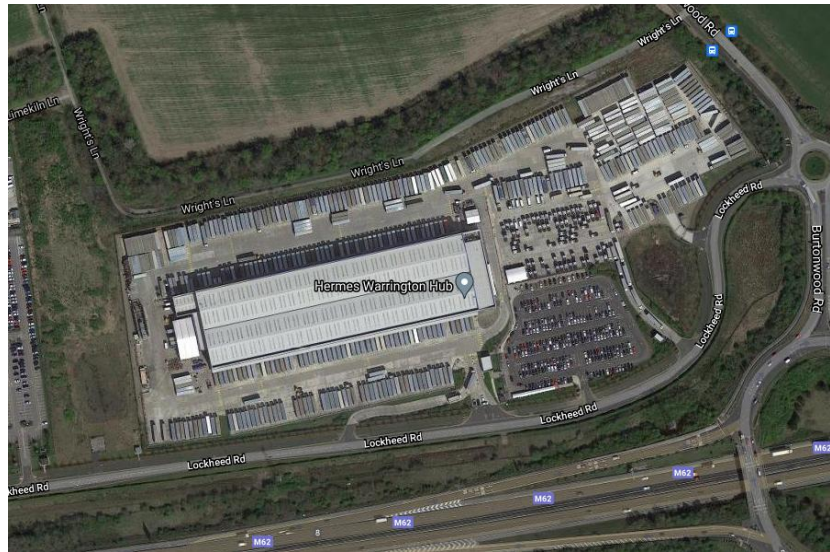
8.17 The second leg of the test of paragraph 141 elates to the full exploration of all other options. Irrespective of conclusions relating to need it is considered that this part of the test is not meet.

8.18 Neither the PSV or background documents provide any clear assessment of alternative provision. 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.

8.19 There is no exploration of the scope for disaggregation of operations. 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 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.





8.20 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*

*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 137*

*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.*

#### 9.1 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".*

9.2 The PSV2021 does changes the nature and location of Green Belt release in South Warrington removing land which was formally part of proposed Garden Suburb and land to the west of Lymm. Additional take of Green Belt land is proposed at Thelwall Heys. Land to the south of Stretton Road in Stretton would be excluded from the Green Belt but previous plans showing that development would not extend west of Spark Hall Close have been changed with indicative plans in SEWUE "A developable proposition" now showing development up to the A49 in the west and the M56 in the South.

9.3 The both versions Submission Draft draws 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. To some readers this may create a justifiable concern that appraisal sets out to justify the Council's expectations rather than providing an unbiased assessment of the Green Belt in Warrington irrespective of consequences for subsequent policy review.

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

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

- It is necessary to understand the South Warrington Green Belt in terms of the function 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.

9.4 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.

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

9.6 It is clear that North Warrington derives value from the Green Belt in terms of prevention of merger with adjoining settlements. Unfettered growth of Warrington would need to be managed to prevent merger with East Widnes, St Helens, and Parkside, within Halton and St Helens. The expansion of Omega. Burtonwood and Winwick could however be increased without conflict with this purpose of the Green Belt.

9.7 A similar issue would apply to the expansion of Croft and Culcheth and Glazebrook in the North East of the Borough. Managed growth of these settlements, beyond that which is currently proposed, does not conflict with the objectives of Green Belt Policy, yet the majority of these areas are discounted on the basis of a Green Belt appraisal which encourages disproportionate weight to be given to the issue of merger of settlements and a consequent discounting of these areas as potential locations for development.

9.8 It is worthy of note that with the exception of Winwick, none of these 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.

9.9 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

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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.

9.10 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.

9.11 Warrington's Green Belt has to be seen in context. It does not exist in isolation but functions alongside and with the Green Belts of North Cheshire, Gtr Manchester and Liverpool. Changes to the Green Belt in Warrington are highly likely to be influential on the policies of the two adjoining city regions and the individual authorities within. The approaches of New Town driven policy of the 1970s and 80's has changed dramatically. Rather than seeking to create new economic opportunities and better housing

outside the cities, Warrington's neighbours have seen massive change in the economic function and environmental regeneration of city centre and inner city areas. This must impact on development in Warrington which is ultimately reflected in the role of Warrington's Green Belt.

9.12 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.

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

9.14 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.

9.15 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. It would seem counterintuitive for the submission draft to remove large parts of this area from the Green Belt.

9.16 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



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significantly altered as a result of encroachment of development and a change to the semi-rural setting of Grappenhall and Walton villages.

9.17 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 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 to the proposed SEWUE undermines this principle to the

considerable detriment to the character and appearance of the area.

9.18 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

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would be changed to the considerable detriment of the locality. The Green Belt function of protecting the setting of historic settlements is eroded.

9.19 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 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.

9.20 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.

9.21 The Parish Council welcomes modification of the Green Belt boundary with land east of Dorothy Farm towards Appleton Thorn now remaining in the Green Belt.

9.22 However this makes the inclusion of land on either side of Sparkhall Close even less logical than may have

previously been the case. The Parish Council is aware of previous objection to the PDO from the owners of this land and their contention that it should be released for development. This contention seems largely based on the scope for the land to be released early in the plan period and that allocation and the grant of planning permission would facilitate use of part of the site for the proposed strategic east-west link road and a new junction with the A49 between the Cat and Lion junction and junction 10 of the M56.

9.23 Previous assessment of the contribution of land to the south of Stretton Road to meet was undertaken by ARUP with the sites identified as R18/088 East and West. The sites were assessed before the completion of more recent development on the North side of Stetton Road.

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9.24 The Parish Council did not necessarily agree with the appraisal previously but it is considered that there is now even more reason to keep this land within the Green Belt.

9.25 Together the land to the east and west of Spark Hall Close provides an appropriate break between the edge of the settlement and the motorway. The site is next to a major gateway into South Warrington with the land between Stretton Road and is highly visible from the A49. Stretton Road provides a logical and robust boundary to the settlement.

9.26 Development of this area would result in sprawl beyond the existing urban area, and encroachment into open countryside. The ARUP report has always accepted that this land contributes strongly to the Green Belt function of preventing encroachment. It is the Parish

Council that this land makes a strong contribution to the purpose and function of the Green Belt

9.27 It is contended that the allocation of this land for development would result in severe and significant harm, which is not justified on the basis that land is readily developable (so is most of the SEWUE) and because it would facilitate formation of the link road suggested in indicative plans.

### Key Challenges as to Soundness

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

*The assessment of current areas of Green Belt is weak and in places erroneous. Although purporting to provide for a*

*methodical and analytical approach to assessing the value of land against the 5 purposes of the Green Belt the approach still relies on judgement, which in a number of cases can be contested.*

*There are instances with the proposed 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.*

### 10 Infrastructure

10.1 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.

10.2 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.

10.3 The Submission Draft continues 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. A hot summer will bring the challenges of expansion and the inability to close a bridge once opened.

10.4 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.

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

10.6 In highlighting concern over infrastructure the Parish Council is aware of the representations to the Plan and to the proposed Local Transport Plan, LTP4 which

highlight in greater depth concerns over the approach to transport infrastructure.

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

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

10.9 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.

10.10 It is noted 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 Parish Council would challenge this assumption.

10.11 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

10.12 It is the contention of the Parish Council that even the start of development of the scale proposed, particularly in South Warrington, without an absolute and clear commitment to the funding of the delivery of infrastructure would be disastrous, compounding existing problems of congestion, air quality, absence of consideration of climate change.

10.13 The IDP is fundamentally flawed in three ways.

10.14 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.

10.15 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 not on completion.

10.16 Thirdly, the detailed schedules relating to the cost and delivery of infrastructure is inconsistent the delivery

schedule, omitting elements of infrastructure identified as necessity within LTP4.

10.17 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 covered in no detail in the IDP.

### Transport Infrastructure - Road

10.18 Modelling of the transport infrastructure by ARUP [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

10.19 At 5.17 The ARUP 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.

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

10.21 There would appear to be a number of inconsistencies between the ARUP 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 and save guarding 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 address in any part of the submitted evidence base.

10.22 The ARUP 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.

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

10.24 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.

10.25 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.

10.26 There are no indications as to how additional traffic flows produced by the development can be accommodated through the already heavily congested Latchford one way system routing the A50 via its junction with the B5156 Station Road and the A5061 into the town centre.

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10.27 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.*

10.28 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.

10.29 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.

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

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10.31 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.

10.32 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.

10.33 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.

10.34 The Submission Draft notes that it will be a requirement that trips generated by development can be adequately accommodated by Warrington's transport network. Clearly this is the correct approach but the policy fails any 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-

- A49 Winwick Road
- A57 Sankey Way
- A49 Stockton Heath

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- A49 Wilderspool
- A57 Chester Road
- A50 Grappenhall
- A56 Walton
- A49/A5061 Warrington Town Centre
- A50 Padgate

10.35 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 a reason for business to look to business park and out of centre locations. The solution to this is 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.

10.36 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.

10.37 Changes to the plan has reduced the scale of development previously proposed which would have accessed the Western Link Road. Less development will reduce developer contributions, New Homes Bonus and contribution through planning obligations. Appendix 13 of the Cushman and Wakefield Report August 2021 Emerging

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Local Plan Viability Assessment indicates contribution through Section 106 Agreements for off-site transportation works is zero.

10.38 The Western Link Road is a concept which has been in gestation for the best part of decade. Within the 2019 PSV it was presented as 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.

10.39 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 West Link as currently proposed.

10.40 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.

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



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- 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)

10.42 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.

10.43 The Bridgewater Canal is crossed by main roads at:

- Walton (A56 Chester Road)
- Stockton Heath (A49 London Road)
- Grappenhall (A50 Knutsford Road)
- Thelwall Viaduct (M56)
- Lymm (A56 Booths Hill Lane)

10.44 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)

10.45 Proposals to develop land for 6000 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.

10.46 The Submission Draft shows 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.

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

10.48 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 bridges and a single carriage tunnel to cross the Bridgewater Canal, each constructed in the 18<sup>th</sup> Century.

10.49 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.

10.50 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.

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

10.52 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.

10.53 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.

10.54 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.

10.55 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.

10.56 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.

10.57 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.

10.58 The Parish Council is aware of consideration by other groups including the Rethinking South Warrington Group in 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.

10.59 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.

10.60 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.

10.61 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.

### Community and Health Infrastructure

10.62 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.

10.63 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 of the 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

*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.*

## 11 Air Quality

11.1 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.

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

11.3 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.

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

11.5 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.

11.6 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.

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

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

11.9 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.

11.10 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



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development. Public transport infrastructure is only planned for the end of the plan period or beyond.

11.11 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.

11.12 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.

11.13 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

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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.

11.14 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 PM<sub>2.5</sub>. 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  $85\mu\text{g}/\text{m}^3$ , levels which are considered dangerous by the WHO.

11.15 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.

11.16 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  $8.47\mu\text{g}/\text{m}^3$  against a WHO recommended maximum of  $10\mu\text{g}/\text{m}^3$ , a deterioration compared to previous assessment.

11.17 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.

11.18 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.

11.19 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.

11.20 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.

11.21 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

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development proposed in South Warrington can ever be consistent with this policy objective.

11.22 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 Parish Council 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*

*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 an anathema to the Plans objective of securing improvement to environment and air quality.*

*In an appeal decision relating to land at Peel Hall Warrington [APP/M0655/W/17/3178530] 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 181 indicates a requirement that opportunities to improve air quality should be considered at the plan making stage to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. The Submission Draft is unsound in this regard.*

### 12 Environment

12.1 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.

12.2 It is considered that the developments proposed for the SEWUE including Stretton, 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.

12.3 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.

12.4 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 for 2019 show traffic through junction 10 of the M56 to average 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.

12.5 The Council's 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.

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

12.7 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.

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

12.9 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.

12.10 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

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- Are visually attractive and effectively landscaped
- Are sympathetic to local character and landscape setting
- Promote health and well being

12.11 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.

12.12 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

12.13 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.

12.14 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.

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

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



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

12.18 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.

12.19 The Parish Council 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.

12.20 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.

12.21 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 represents an additional development cost which is not accounted for in any infrastructure development requirements.

12.22 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

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

14.2 Much of the area to be given over to development in the SEWUE including Stretton, 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.

14.3 The HRA [AECOM March 2019] presented in support of the Submission Draft has been update in August 2021. Again it has to be question 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.

14.4 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.

14.5 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.

14.6 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.

14.7 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.

14.8 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

*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 2019]

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

15.3 The character of South Warrington is driven by the setting of distinct settlements within a wider rural context. It is this characteristic 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. Stretton, Lymm,

Appleton Thorn, 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.

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*

*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.*



### 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.*

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 PARISH COUNCIL that the scale of development proposed is unacceptable, the size of the SEWUE, Fiddlers Ferry and

the SEW 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 Parish Council 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*

*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 fails 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 of 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*

*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 as 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.

### MD6 South East Warrington Employment Area

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

18.4 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.

18.5 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.

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

*Key challenges as to soundness*

*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 section 5 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 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 Parish Council does not have access to resources and information necessary to properly interrogate costs attributed to different elements of infrastructure proposed. It is considered however that

given the critical requirement to deliver infrastructure on programme and alongside any proposed development, that the Council must provide clarity on the cost analysis of infrastructure provision.

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 PARISH COUNCIL and the affiliated Rethinking South Warrington's Future (RSWF) Group have submitted their observations on the content and veracity of the LTP. These representations do not seek to rehearse those submissions, but would note the range of legitimate questions, highlighting flaws and issues within the LTP, which would raise similar concerns over the deliverability of the

complete package of transport infrastructure needed to support the scale and form of development proposed.

### *Key Challenges as to Soundness*

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

*The mechanics for funding such levels of infrastructure 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.*

### 20 Duty to Cooperate/Community Consultation

20.1 The Parish Council has expressed concern over the approach to public engagement throughout the gestation of the Local Plan.

20.2 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.

20.3 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.

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

20.5 The Parish Council 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.

20.6 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.

20.7 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.

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

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

### 21 Conclusions

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

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

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

21.4 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.

- 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. Any new development should prioritise Brownfield land first and this should be fully reflected in the plan. No Green Belt should be sacrificed in the first instance.
- 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.

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- There is no need for development which will result in an unacceptable level of harm to air quality and the environment
- There is no need for development which will destroy the character and distinctiveness of 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.

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

21.6 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.