

Proposed Submission Version Local Plan

PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

Name of person completing the form: Colin Morgan

Email address: [REDACTED]

2. What type of respondent are you? Please select one option only.
If you are an agent please select the type of client you are representing.

A local resident who lives in Warrington

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	-
Agent name (if applicable)	Colin Morgan
Address 1	[REDACTED]
Address 2	[REDACTED]
Postal Town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

None of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant		
Sound		X
Compliant with the Duty to Co-operate		

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

There is no justification given in the Local Plan for the St Helens Omega Extension land to be taken from the St Helens Green Belt. In addition, this representation argues that no justification of 'very special circumstances' - as required for removal of this land from Green Belt - can be made because the basis for Employment Land for Warrington over the period of the plan is unnecessarily high because it places too much emphasis on historic land take-up and because of the direct and indirect harm done by such a development.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

N/A

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Modification to remove the requirement for the St Helens Omega Extension from the Warrington Local Plan. This proposal has not been justified and cannot be justified as required - as explained in the attached document - so its removal is required to make the Local Plan sound.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I wish to be party to the decision process by which the decision to take the proposed Green Belt land for the St Helens Omega development is or is not made and its justification or otherwise.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Warrington Local Plan Objection October 2021.docx - [REDACTED]

Comments/file description

Supporting document to explain reasons for unsoundness of current version of Local Plan October 2021.

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**

Warrington Local Plan - Objection to the Proposed Development of Green Belt Land for the St Helens Omega Extension (Colin Morgan, Warrington Resident – November 1st 2021)

Introduction

The proposal to remove farmland and woodland from the Bold Forest Park area of the St Helens Green Belt for the **St Helens Omega Extension** has not been justified in the Warrington Local Plan, and its destruction to make a contribution to the Warrington Employment Land allocation cannot be justified.

A never-previously-developed piece of Green Belt productive farmland cannot be taken for a development of this type unless it is justified by 'very special circumstances'. This type of warehousing development is highly destructive to the environment. It has become increasingly clear in recent years that we are destroying the planet field by field and this must stop if we are to have any chance of meeting Climate Change targets. In addition, the proposed development of this land does not take account of the Government plan to respond to the Climate Emergency, nor does it take account of the wishes of the local people. Either of these important considerations should be sufficient to stop the development of this land, without recourse to a 'special circumstances' argument.

Justification Needed to Develop of Green Belt Land

Documentation on proposed Green Belt boundary changes says "There is generally a presumption in favour of development in planning." But... "In areas designated as Green Belt, the presumption is reversed and the onus is on the developer to demonstrate (with very special circumstances) why permission should be granted."

"National planning policy makes provision for changes to be made to the Green Belt. Critically, changes to the Green Belt are made through the local plan. In order to make a change to the Green Belt boundary in the local plan there have to be 'exceptional circumstances'" - National Planning Policy Framework (NPPF) paragraph 83.

Government documentation states that Green Belt land can be used for development only when essential, with proper justification and 'very special circumstances' being required. In the case of the development of the parcel of land for the St Helens Omega Extension, there are no special circumstances identified in the Local Plan that justify taking this land for employment purposes. Nowhere in the Local Plan document is a benefit/harm justification argument even attempted.

In addition, I don't believe that the overall quantity of Employment Land specified as being needed in the Warrington Local Plan (as taken from the EDNA Refresh document, August 2021) is either realistic or necessary. The calculation is based on four estimates – two from economic models and two using historic uptake figures. The unrealistic maximum of these four estimates has then been taken as the amount of Employment Land required. The economic models both show figures of less than 40 hectares of Employment Land being required in Warrington over the period 2021-2039. The first estimate based on historic data includes the 226 hectares of the one-off opportunity to develop the old Burtonwood Aerodrome (the Omega warehouse development), which then gives a proposed need of 277

hectares, including contingency, over the period 2021-2039. However, if the historic land usage does not include the old Aerodrome site then the projection is 164 hectares, including contingencies. This shows the higher historic figure is heavily distorted by the unique opportunity presented by the Burtonwood aerodrome development. From this, this analysis, the highest estimate has been taken for the Local Plan, without regard to either the economic model prediction or the historic prediction without the unique contribution from the Omega development on the old aerodrome site. The total need for Employment Land is therefore quoted in the report as 316 hectares. Fortunately for the future development of Warrington, there is now another significant brownfield site available – the Fiddler’s Ferry power station site with a total area of about 300 hectares, of which the Local Plan now says about 100 hectares are available to be taken up as Employment Land over the duration of the Local Plan. Therefore, there is the opportunity develop significant additional Employment Land in Warrington, well above that envisaged by the economic models – and, by taking into account of other brown field sites within the borough and taking more of the Fiddler’s Ferry site, if necessary, it should be straight forward to reach the much higher historically based 164 hectares quoted for Employment Land needs without swallowing any Green Belt land. Note that the Fiddler’s Ferry power station site is well connected to the national grid and has its own railway line that could be used for sustainable transport – unlike the Omega development that is served only by roads. So, there is no need to destroy an area of Green Belt farmland and woodland in the St Helens Bold Forest Park, let alone a case that justifies the ‘special circumstances’ required to remove the land for the St Helens Omega Extension from the Green Belt.

The fact that this development has been pursued under the ‘Duty to Cooperate’ has led to a lack of clarity over which council has responsibility for this proposed change it, as it appears fall between two stools. St Helens have been happy to include it in their recent Local Plan, saying that Warrington Council needs it – presumably on the basis that Warrington can provide the justification necessary for the use of the Green Belt land. However, without this justification, St Helens is not in a position to remove this land from Green Belt.

Harm that Would be Caused by the Proposed Development of the St Helens Omega Extension Green Belt land

In order to justify removing this farmland and woodland from Green Belt, the harm from the destruction of the natural area, the environmental impact on the rest of Bold Forest Park, and the visual harm from the warehouses themselves, plus the construction, transport and pollution harms would all have to be properly assessed and a justified argument made that the harm is outweighed by any perceived benefits of this specific development at this proposed location.

The harm that would arise falls into two main areas – direct destruction of the natural local environment and on-going harm, such as that from diesel transport side effects, which include air pollution and additional congestion on local and national roads.

The farmland and woodland proposed for the St Helens Omega Extension is part of Bold Forest Park. This is an area that has been designated for natural enhancement, including

tree planting, as spelled out in the Area Action Plan signed off by St Helens as recently as 2017. The aim of this proposal to build warehouses on these fields and woodland is in direct conflict with the stated aims of the AAP and reverses the gains hard won in this previously industrial and still deprived area.

In addition, the fields and woodland that comprise the parcel of land designated for the St Helens Omega Extension currently acts as a buffer between the existing Omega warehousing and the ancient deer park that occupies the central area of Bold Forest Park. St Helens Council put significant work into the Area Action Plan (AAP) as mentioned above to help the local population towards gaining additional benefit from the inherent environmental features and parkland and to protect and further enhance the area to the south of the town of St Helens. The AAP sets out the intentions for future protection and environmental enhancement. Commercial development is to be encouraged in the area, but it has to work with the natural environment, not destroy it. Building warehouses destroys the land and introduces air pollution, noise, the intrusion of high buildings and light pollution, plus additional traffic.

This area of farmland is superior in appearance to that found in many areas - the landscape consists of a mixture of fields under various cultivation, patches of tall woodland (protected by TPOs), a stream and ponds. These areas of woodland have been in the landscape for over two hundred years as it seems they were set out at the same time as the driveway to Bold New Hall, built in the 1740s. The farmland in this part of Bold Forest Park is of good quality – the fields in this area are capable of producing a wide range of crops including wheat, maize and potatoes. In terms of wildlife in the area, I am not a bird-watcher but have counted over forty different species of birds, and have also seen hedgehogs, hares, foxes and bats. The noise, light pollution, and disturbance caused by this proposed development would blight this landscape and disturb a broad band of Bold Forest Park to the west. If development of the area were allowed, there would be no going back, and this rural edge of St Helens - where the quality of life desperately needs to be improved - would be lost forever.

This proposed development would result in the loss of a strong, sound and effective Green Belt tree-lined boundary, loss of good farmland, loss of a buffer to established woodland, and the blighting with warehousing of a landscape picked out for special environmental consideration and recreational potential. Therefore, I feel that the case for 'exceptional circumstances', as required by the NFPA for the change to go ahead, cannot be made with some enormous ensuing benefit and, on the basis of the losses that would be incurred, the proposal to remove these 30 hectares from Green Belt cannot be justified on the grounds of the direct environmental harm alone.

However, there are further harms that would be caused by this proposed development. Namely, more congestion and pollution, both of which lead the local population to the west of Warrington to be opposed to this development. In addition, this development takes in the wrong direction with respect to global warming where the need to reduce our reliance on fossil fuels has never been more urgent, as recognised by the on-going Climate Emergency.

The Climate Emergency is now being acknowledged by local and national governments everywhere. Local decisions can help or hinder in this vital work. Developments such as this lock us into burning fossil fuels for many years. Siting the warehouses here, rather than in an area with sustainable transport, means that, in addition to the direct destruction of the Green Belt, the proposal would be reliant on fleets of fossil-fuel burning HGVs.

With respect to the additional air pollution from the resultant diesel fumes, the Lancet said in 2018 that 90% of children are breathing unsafe air. It says - "This study reveals the terrible legacy of successive UK governments' failure to act over illegal levels of air pollution. We are raising a generation of children with stunted lung capacity. The public very much wants better air quality, and they are right." The whole basis of this development is diesel HGV movements. Tens of thousands of people live in this area, both in St Helens and Warrington - including many children.

In terms of traffic congestion, the area to the west of Warrington already suffers significant traffic disruption. On days when there is a problem on one of the three motorways around to Warrington, this often causes considerable congestion in the town or even hours of gridlock. Whilst the M62 Jn 8 has been improved and is currently coping with the level of traffic, the M62 Jn 7/M6 Jn 21A is not coping. Nor is the rest of the M6 as it passes Warrington – the weight of traffic is already at levels where the motorway cannot cope and there are frequent hold-ups even when there are no contributory incidents. Therefore, the additional traffic from this proposed further development would add to the existing disruption.

Summary

To summarise, the Employment Land area requirement of 316 hectares as proposed in the Warrington Local Plan has no sound basis as it uses the highest of four estimates and includes reference to the historic windfall of the old Burtonwood aerodrome that has now been fully developed as the Omega warehouses and housing estates. However, the extensive Fiddler's Ferry brown field site of 300 hectares has recently become available and 100 hectares of this has now been included in the proposed Employment Land allocation going forward. Without the Burtonwood aerodrome development, the historic Employment Land use forecast was calculated to be about 164 acres over the period of the plan. This would appear to be both a more realistic figure for Warrington's likely needs and, importantly, achievable without recourse to the removal of farmland and woodland from the Green Belt in order to meet Warrington's Employment Land requirements over the period of the plan.

In addition, if a 'special circumstances' justification were to be attempted for the development of the St Helens Omega Extension land for warehousing, the fact that there are other areas in the northwest region actively competing to develop warehousing would need to be taken into account – there is competition for such developments in the area and this also undermines any 'special needs' argument as sites are available elsewhere in the region.

Also, it should be noted that the argument for Employment Land requirements in the Warrington Local Plan does not appear to take account the net influx of workers that commute into Warrington each day – adding to the congestion and pollution – but evidence that it is suitable homes rather than jobs that are in short supply in the borough?

This proposal to develop the St Helens Omega Extension on this farmland and woodland would mean the loss of a strong, sound, long-established and effective Green Belt boundary, loss of good farmland, loss of a buffer to established mature woodland and parkland ripe for improvement, and the blighting with warehousing of a landscape picked out by the St Helens authorities for special environmental consideration and its recreational potential. There is no attempt in the Local Plan to argue that any benefit from the addition warehousing at this location would in any way out weigh the many harms done to the Bold Forest Park by this proposed development.

In conclusion, I feel that the case for ‘very special circumstances’, as required by the NPPF for this parcel of land to be developed as suggested, has not be made and, therefore, given the harm that would be done, the proposal to remove these 30 hectares from Green Belt has not and cannot be justified and that the request to St Helens for cooperation on this change to their Green Belt boundary should be rescinded.