

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: John Coxon

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 Developer / Landowner

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	Emery Planning
Agent name (if applicable)	John Coxon
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.

MD6 South East Warrington Employment Area

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

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

Please see attached representations

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

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

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.

Please see attached representations

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.

Please see attached representations

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.

Please see attached representations

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:

We wish to attend the hearings to make oral submission, respond to the Inspector's questions and respond to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.

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 UPSVLP - [REDACTED] Reprs.pdf - [REDACTED]

You have just completed a Representation Form for MD6 South East Warrington Employment Area.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (**Part B**)

PART B - Representation Form 2

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

From the drop down list please select one option.

GB1 Warrington's Green Belt

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

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

Please see attached representations

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

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

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.

Please see attached representations

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.

Please see attached representations

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).

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Please be as precise as possible.

Please see attached representations

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

- File: Warrington UPSVLP [REDACTED] pdf - [REDACTED]

You have just completed a Representation Form for GB1 Warrington's Green Belt.

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)**



Local Plan Representations

Warrington Updated Proposed Submission Version Local
Plan 2021 - 2038 – [REDACTED]

[REDACTED]

for Mr & Mrs Carl Hickman

Emery Planning project number: 19-268

Emery Planning

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

www.emeryplanning.com

Emery Planning

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



unlocking development opportunities

Project : 19-268
Site address : Warrington Local Plan,
Warrington, TBC
Client : Mr & Mrs Carl Hickman

Date : 15 November 2021
Author : Nick Scott

Approved by : John Coxon

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

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Emery Planning Partnership Limited
trading as Emery Planning.

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1. Introduction

- 1.1 Emery Planning is instructed by our clients, Mr & Mrs C. Hickman, to prepare and submit representations to the Warrington Updated Proposed Submission Version Local Plan consultation in relation to their property at [REDACTED]. A site location plan is appended at **EP1** showing the extent of their land ownership.
- 1.2 The representations follow and extend on those previously made by Emery Planning on behalf of Mr & Mrs Hickman in June 2019, in relation to the same site.
- 1.3 Our representations can be summarised as follows:
- Our client's site should be included within the proposed South East Warrington Employment Allocation (SEWEA) under Policy MD6.
 - We object to the site's current designation in the indicative proposals map as Green Belt. The site would be surrounded by existing permanent development on all sides following the allocation of the SEWEA. It would serve no meaningful Green Belt function, and on this basis the site should be removed from the Green Belt.
 - The site is deliverable for employment development in the short term and would make an immediate contribution to the delivery of the first phase of the SEWEA.
 - There are no technical constraints that would materially weigh against the site's delivery as employment land in phase 1 of the SEWEA.
- 1.4 Our full case is provided below.

2. Site location and description

- 2.1 The site is a triangular parcel of land located to the south-east of Grappenhall. It includes a dwelling, outbuildings and associated curtilage, but is mainly undeveloped and in agricultural use. It is bounded to the north by Cliff Lane, to the south-east by the access road that comes off Cliff Lane, and to the south west by agricultural land and a number of existing dwellings.
- 2.2 The site has a direct relationship with the local road network and is approximately 100m from the M6 motorway and is less than a kilometre from the M56. It is well related to existing industrial/employment development to the west.
- 2.3 The site benefits from its own access, and we are not aware of any ecological, topographical or contamination issues. The site is located within Flood Zone 1 as identified on government flood risk maps. It is not at risk of flooding from surface water.
- 2.4 Outline planning application reference 2019/34799 was registered by the council on 15 May 2019, and proposes a major employment development comprising the construction of up to 287,909m² (gross internal) of employment floorspace (Use Class B8 and ancillary B1 (a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure including car parking and vehicle and pedestrian circulation, alteration of existing access road into site including works to the M6 J20 dumbbell roundabouts and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station, and ecological works, accompanied by an Environmental Statement. An indicative layout plan submitted with the proposal is appended at **EP2**.
- 2.5 Once the local plan is adopted, and the SEWEA is removed from the Green Belt, outline planning permission will be granted. This proposal would enclose our client's site on three sides with prominent and substantial storage and distribution buildings, with the other (northern) side bound by the highway along Cliff Lane.

3. Policy MD6 – South East Warrington Employment Allocation (SEWEA)

- 3.1 Our clients support the strategic employment allocation at south-east Warrington and broadly support the objectives of Policy MD6 with regard to the provision of high-quality employment development within the allocation area. It is recognised that there is a significant shortfall in the Borough of employment land, and this allocation will go a significant way to helping meet that shortfall.
- 3.2 However, it is illogical to exclude our client's site from the wider SEWEA allocation, and to retain it as Green Belt. An extract of the proposals map showing our client's site is provided below:



- 3.3 The Local Plan Evidence Base documents below provide no explanation as to why, when assessing the Green Belt and potential development impacts upon it, our clients site is disaggregated from the neighbouring parcels of land. The proposed Green Belt boundary in this location is utterly illogical, and it effectively proposes a narrow triangle of Green Belt that is surrounded by permanent development on all sides, including the significant road infrastructure to the north.

- 3.4 Our client's site is constrained by exactly the same physical features and bears near identical landscape or visual characteristics to the parcel assessed as R18/106. Had this assessment taken place, it is reasonable to conclude that Arup would have found that, at the present time, our client's site, like much of the remainder of the SEWEA site, forms a "moderate" contribution to the purposes of the Green Belt.
- 3.5 Given the intention to remove the SEWEA strategic allocation from the Green Belt, and the Green Belt boundary is regularised as currently proposed, our clients site would form an isolated island of Green Belt which would fail to meet any of the five purposes of the Green Belt, as set out at paragraph 138 of the Framework. It would make no contribution to the Green Belt given it would be surrounded on three sides by large scale development.
- 3.6 The retention of our client's land as Green Belt would not check the unrestricted sprawl of large built-up areas; would not prevent neighbouring towns from merging in to one another; would not assist in safeguarding the countryside from encroachment; would not preserve the setting and special character of historic towns; and would not assist in urban regeneration, by encourage the recycling of derelict and other urban land. The remaining land would not fulfil any Green Belt purpose.
- 3.7 Paragraph 143 of the Framework states that when defining Green Belt boundaries, plans should "not include land which is unnecessary to keep permanently open"; and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent". Retaining our client's site within the Green Belt would fail on both counts.
- 3.8 Policy MD6 paragraph 10 states:

"The Green Belt boundary is defined by Grappenhall Road to the northern boundary, the M6 to the east and the M56 and Bradley Brook to the south."

- 3.9 This would appear to contradict the draft proposals map, as this shows our clients site, south of Grappenhall Road / Cliff Lane as Green Belt. For clarity, and given the points made above relating to our clients site performing no Green Belt function and the need for clear Green Belt boundaries, it is requested that this paragraph be amended to read as follows for absolute clarity.

"The Green Belt boundary is defined by Grappenhall Road and Cliff Lane to the northern boundary, the M6 to the east and the M56 and Bradley Brook to the south."

- 3.10 The proposals map should be revised to reflect the above clear boundaries which would utilise well defined physical features, and would likely be permanent and defensible. On this basis our client's site should be omitted from the Green Belt and included within the SEWEA. Alternatively, our client's land should be removed from the Green Belt, even if it is not included within the SEWEA. To not do so would be illogical and would not provide a strong, defensible Green Belt boundary, as suggested at paragraph 10.6.10 of the plan.
- 3.11 We support the Council's commitment to improving key junctions of the M56 and M6. However, any slippage on this front should not preclude the delivery of much needed employment sites in the first phase of SEWEA development. As set out in the 'Warrington Economic Development Needs Assessment Refresh (August 2021)' document which forms part of the evidence base for this consultation, there is a total shortfall of 277.39ha of employment land that needs to be addressed through this plan to 2038. Our client's site could make an immediate contribution towards addressing this shortfall, and is deliverable in the first five years of the plan.

Site specific considerations

- 3.12 As stated above, the proposed indicative designation as Green Belt within the wider employment allocation is inappropriate for the site, particularly when assessed in parallel to the wider parcels that form the SEWEA to the south and west. It is a site bounded on multiple sides by proposed employment development and would be a highly logical rounding off of the proposed allocation, remaining within clearly defined Green Belt boundaries, as set out above.
- 3.13 The site is not physically constrained by flood risk, ecological issues or topography and has good access to Cliff Lane and potentially Grappenhall Road (which has been identified in the Development Framework as the primary access point for the northern proposed development parcels) to the north and the surrounding highway network, including the M56 and M6.
- 3.14 The site is highly sustainable in the context of the wider proposed employment allocation, as well as its relationship with existing employment land to the west. It is also well related to local infrastructure and amenities.
- 3.15 The site is available and suitable for employment development and would be deliverable in the first phase of the SEWEA. Removal of this site from the Green Belt would not harm the purposes of the Green Belt and would provide deliverable employment development which would immediately contribute towards the Borough's significant employment land requirement.

3.16 The retention of our client's site within the Green Belt would form no Green Belt purpose and would therefore be unsustainable and illogical.

Green Belt compensatory improvements

3.17 Part 11 of Policy MD6 states:

“A scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required. Financial contributions will be considered where this would help to ensure that the benefits of compensatory improvements can be maximised by providing them in the most appropriate location.”

3.18 Clarity is required as to what the policy is requiring and where such land would be located. For clarity, our client has no intention of making their land available for compensatory improvements as the land is already in use in association with the dwelling.

4. Policy GB1 – Green Belt

4.1 Our client objects to the proposed Green Belt boundary in the location of their site, as shown at Appendix **EP1**. The resultant Green Belt boundary would include land which does not fulfil any Green Belt purpose and land which is not necessary to keep permanently open. Full details are provided above in our response to Policy MD6.

5. Summary and conclusions

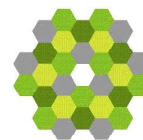
5.1 Our representations can be summarised as follows:

- Our client's site should be included within the proposed South East Warrington Employment Allocation (SEWEA) under Policy MD6.
- We object to the site's current designation in the indicative proposals map as Green Belt. The site would be surrounded by existing permanent development on all sides following the allocation of the SEWEA. It would serve no meaningful Green Belt function, and on this basis the site should be removed from the Green Belt.
- The site is deliverable for employment development in the short term and would make an immediate contribution to the delivery of the first phase of the SEWEA.
- There are no technical constraints that would materially weigh against the site's delivery as employment land in phase 1 of the SEWEA.

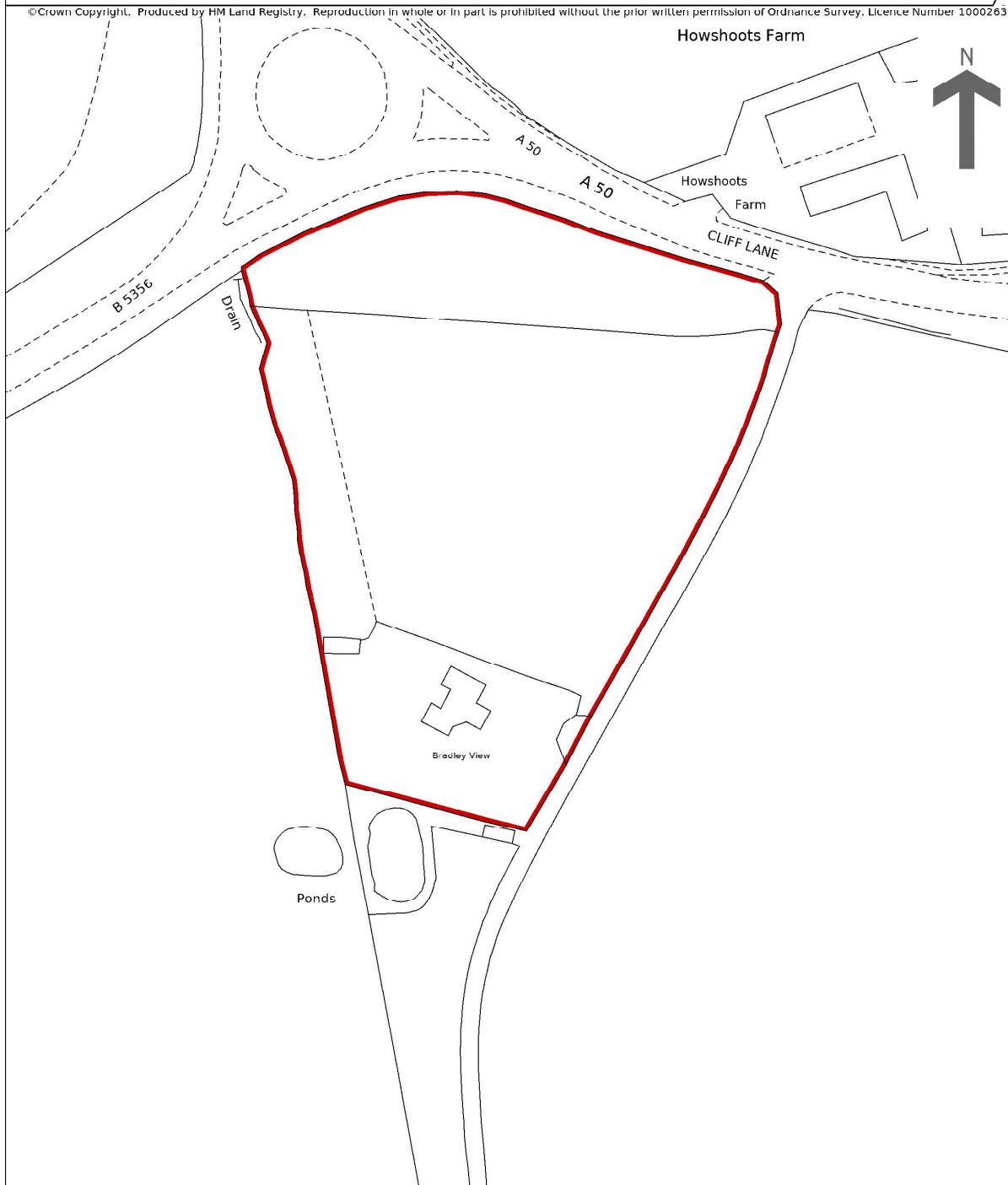
6. Appendices

- EP1. Site location plan
- EP2. Application 2019/34799 Indicative Site Layout Plan

EP1



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EP2



Rev. Date By Description

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