

Dear WBC Planning Department

I would like to place on record my objections to the Preferred Development Option (PDO) of the Garden City Suburb. While I strongly oppose the whole vision of the plan, I am going to concentrate my arguments around the development of the Green belt in the Grappenhall area.

Firstly, I feel the value for the greenbelt adjacent to Stockton Lane has been vastly underappreciated by the ARUP report commissioned by yourselves. This area of greenbelt is essential to stop the villages/areas of Grappenhall, Appleton and Stretton from becoming one uniform settlement, and in so doing losing all of each areas character.

Mr Harry Shipley, commissioned on behalf of myself and residents of Stockton Lane, has looked in detail at this report and found fundamental flaws in its production and methodology. I refer you to his submission, which I know you have received, for the full details. However I include an attached copy of Mr Shipley's submission in this email to avoid any confusion.

The main driver for greenbelt release seems to be generation of funds under the guise of becoming a "new city"

Maybe it would be better to focus on improving Warrington as a town, as currently it is in desperate need of such.

The scoring methodology in the ARUP greenbelt assessment is also flawed, and some areas scored as weak, when looking at the figures closely, have been miscalculated. The value of this area of green belt is in its prevention of sprawl and conglomeration of the villages of this area and this has been "overlooked" in the report conducted by ARUP.

Mr Shipley also questioned the methodology used and scoring system, compared with professionally accepted and used standards. Again I refer you to his report.

I notice that the green belt assessments that grade the green belt area that separates Grappenhall Village and Appleton as poor have been carried out as a "desktop" exercise, with no site visit. Is this any way to classify a physical landscape such as green belt?

The assessment itself when read does seem flawed as this area stops Appleton merging with Grappenhall Village. Undoubtedly this would result in the beautiful, historic village centre, and sensitively developed surroundings, to merge in an urban housing estate confluent with Appleton and Stockton Heath. In so doing, losing the intimate, historic feeling of this very recognisable area. This would result in the loss of the heritage asset of the area of Grappenhall Village, the green belt between the village and Appleton helps to preserve the historic and picturesque character of this area, which would be lost if the proposed development went ahead.

I feel the following statement from WBC's own website regarding the ARUP greenbelt assessment should be considered;

This is an initial assessment and there will be a need to undertake more site specific assessment work as part of the Local Plan Review process. This assessment does not consider whether exceptional circumstances exist or make any recommendations relating to the alteration or review of Green belt boundaries.

A major brownfield site has been omitted from the plan (Fiddler's Ferry power station), and no consideration has been made of brownfield sites which will become available over the time period of the plan.

The calculation for new homes is also flawed and has been questioned by different experts. The government's new formula has not been used and the uplift cannot be justified.

Certainly no exceptional circumstances are proven for greenbelt release, except the aspiration of a "new city" and the cash this would require.

Secondly, another major concern is the placement and timing of infrastructure for any development that goes ahead. I was informed by one of your representatives at the Lymm consultation that the council has no funds to pay for this at present. Therefore this option cannot be considered sustainable or viable.

Mr Shipley has brought to my attention the role the Highways Agency plays in signing off the plans, and at present this seems a long way off, although I understand this is currently under discussion. Please again refer to his report for full details.

Thirdly, the road network around Appleton and Grappenhall is not suitable for such an increase in traffic. There are narrow, single track roads, weight restricted bridges and height restricted bridges. These roads cannot be altered and with the landscape would be very difficult if not impossible to add further Bridgewater Canal crossings. The idea of using Stockton Lane as a bus route is ludicrous. It is single track, no surface water drainage and surrounded by important wildlife habitat. There is a Local Wildlife Site (information form Cheshire Wildlife Trust) at the edge of the fields bordering Stockton Lane which has not been considered in the maps/plans.

The area of green belt adjacent to Stockton Lane, Church Lane and Lumb Brook Road is particularly rich in wildlife. This is wildlife that thrives because of the unique mix of habitats here; managed grazing, arable farmland, hedgerows, woodland and the historic Bridgewater Canal.

Specific creatures include buzzards, water voles, newts, kestrels, owls, pheasants, stoats, hedgehogs, kingfishers, bats, foxes and myriad insects (including stag beetles) and small birds.

Kingfishers are afforded the highest degree of legal protection under Schedule 1 of the Wildlife and Countryside Act 1981. It is an offence to disturb these birds when nesting in any way. Human disturbance of nesting birds is a serious problem due to the nature of these birds behaviour.

Bats are afforded special protection by both domestic and international legislation. It is a criminal offence to disturb a bat roost (with or without bats in) or group of bats or to obstruct access to a bat roost (i.e. bat commuting areas).

There seems to have been no mention of ecological and environmental surveys of any of the greenbelt land to ascertain the presence of sensitive populations of wildlife.

The presence of a “country park” would not replace these habitats and many of these species would be lost. The other issue that increased housing brings, which would affect the nocturnal wildlife, is increases in light levels at night due to increased street lighting. Recent studies have highlighted the issues that bats have if areas are changed to a built up environment.

No consideration seems to have been given to the vast improvements needed in healthcare. The most recent CQC report from Warrington General Hospital is less than ideal with significant room for improvement identified. Has a plan been formulated with NHS England regarding the extra funding needed to provide for the increase in population? The same argument applies to dental, pharmaceutical and social care provisions. Other concerns include:
Pollution

Warrington Borough Council's credit score has recently been downgraded by Moody's. This is due to high risk, expensive spending plans based solely on increasing debt levels by borrowing. The notion of such vast plans over such a long period with so many variables in this climate seems untenable.

Warrington Borough Council have not bothered to perform Environmental Impact Assessments, Multi Modal Traffic Assessments, industry standard Greenbelt Assessments, Pollution level Assessments, just to name a few, which is very disappointing. It also means that the Local Plan PDO, in its current state, is vague and unfit for purpose.

Maps are difficult to read and very vague in what they are referring to. How can residents comment on such vague ideas?

The Consultation process was poorly run. Communication by the council was atrocious. I learned of the plans and consultation events from neighbours and social media. I have heard nothing directly from the council, despite a major bus

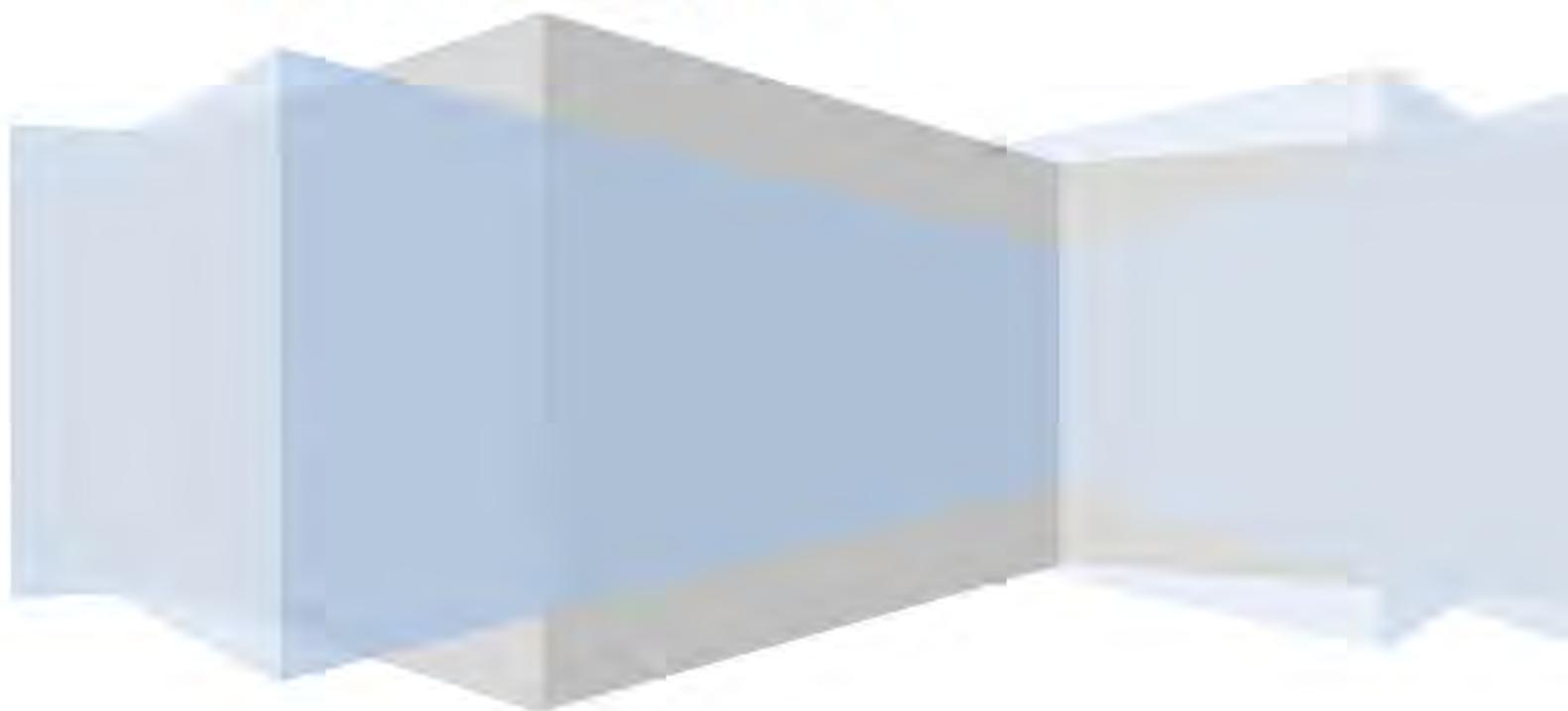
route proposed to run past my front door. Instead a notice of the Local Plan PDO public consultation was posted in the Westmorland Gazette. Comments please?

We do hope that WBC take account of all the well informed and educated objections and views that have been voiced over this consultation period. As mentioned above we have enlisted the help of a planning expert for this initial consultation. We have funding in place to ensure his guidance through the continued planning process, even progressing to judicial review should it be required.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

**Warrington Council's
Preferred Development
Option Regulation 18
Consultation July 2017:
Clients' Response**



1. Introduction

1.1 Professional Experience

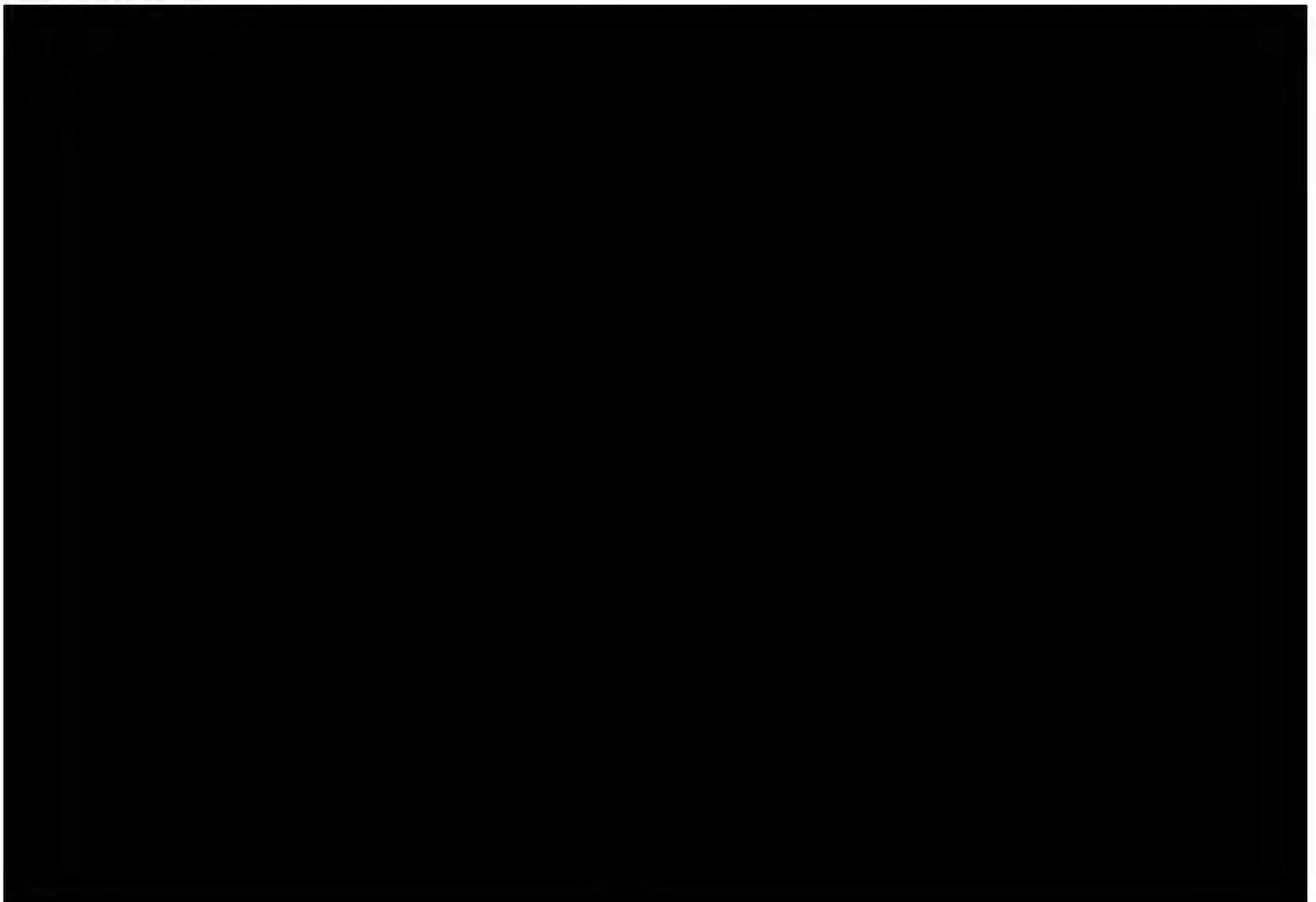
I am practice principal and I am a long standing Member of the Royal Town Planning Institute. In 1999 I was invited to become a Fellow of the Landscape Institute. Only 1 other planner in the UK holds this dual professional qualification.

I have worked for 20 years in planning and environmental consultancy, and for 24 years as a public sector planner and landscape architect, at a senior level. I have undertaken work in relation to the planning and design of a wide range of projects, including many housing developments. I helped prepare the masterplans for the Bridgewater and Westbrook Districts of Warrington at the time of Warrington's inception as a new town and therefore I have a deep knowledge of the planning history of Warrington. I have prepared evidence and attended hearings for many planning appeals and public inquiries and have prepared and given evidence using the Landscape Institute method for Landscape and Visual Impact Assessment (LVIA).

This response to a Regulation 18 consultations on behalf of my clients is therefore based on relevant professional planning experience as well as wider experience and capabilities, gained at a senior level.

1.2. Background

In August 2017, I was approached by my clients as listed below to represent their interest and prepare a response to the above Regulation 18 consultation, on their behalf. My clients are:



This report addresses the following issues:

- : The selection process for a preferred option
- : Supporting documentation to the consultation;
- : The South Warrington Urban Extension Framework Plan; and
- : The conclusions drawn in selecting the Preferred Option.

1.3. Historical context

Warrington is generally accepted to being a very successful town/New Town. In preparing plans at its inception as a New Town, great care was taken to ensure that the necessary infrastructure was in place to allow development to proceed in a proper manner and that the most sensitive environments were protected. This was particularly so for the Bridgewater District and in fact, the road system became one of, if not the, defining issue. The Manchester Ship Canal was the main obstacle to improving the connectivity between Bridgewater and the Town Centre. A strategic decision was made to limit development in Bridgewater until the infrastructure was in place to sustain it.

At that time, it was intended to replace the high level bridge at Accers Road with a new high capacity road bridge, thus opening up Bridgewater for sustainable development. That bridge was not built. The Council is now faced with exactly the same decision as was required in the 1970s, namely, how can new development in the form of SWUE be connected to the Town Centre. It was then, and is now, the most important issue to be resolved in planning terms as it defines the spatial configuration and phasing of the whole development. Lamentably, this issue has not been addressed by the Council. I can find no supporting documentation which demonstrates how this issue is properly addressed, other than a range of documents postponing proper investigation.

1.4 Options Selection

The following high level spatial options were offered to help select a Preferred Option:

- : Option 1 - Green Belt release only in proximity to the main Warrington urban area;
- : Option 2 - Majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements; and
- : Option 3 - Settlement extension in one or more settlement with remainder of growth adjacent to the main urban area.

The Council's observations on the 3 options are recorded below:

Option 1 - This option has the potential to contribute positively to the objectives of the plan and would enable Warrington to meet its development needs whilst also contributing to the delivery of Warrington New City. Depending on the specific locations for development, it could provide a sustainable, viable and deliverable option for meeting Warrington's development needs and provides the opportunity to maintain the permanence of the Green Belt at a strategic level through managed green belt release.

Option 2 - This option has the potential to contribute positively to the plan objectives and would enable Warrington to meet its development needs whilst directly contributing to the delivery of Warrington New City. Depending on the specific locations for development, it could provide a sustainable, viable and deliverable option for meeting **Warrington’s development needs and provides the opportunity to maintain the** permanence of the Green Belt at a strategic level through managed green belt release. In addition, incremental growth in the outlying settlements could contribute to longer term sustainability of local services and local business, promote local housing choice and deliver a number of smaller sites in the early part of the plan period.

Option 3 - Although a settlement extension in itself could provide a sustainable form of development in principle, the option as a whole does not perform as well against the objectives of the Plan as the other 2 options. It could have detrimental impacts on Green Belt, the character of settlements and may result in secondary school capacity issues. It would also result in less development being focussed on the main urban area and therefore could reduce the ability of the Council to deliver strategic infrastructure and **therefore dilute the Council’s New City aspirations.**

The Council selected Option 2, which is the subject of this round of public consultation.

The following detailed options were **tested in order to establish the main development locations:**

- : **Option 1 - A Garden City Suburb to the south east of the Warrington main urban area of approximately 8,000 homes;**
- : **Option 2 - A Garden City Suburb of approximately 6,000 homes & an urban extension to the south west of Warrington of up to 2,000 homes;**
- : **Option 3 - A Garden City Suburb of approximately 6,000 homes & an urban extension to the west of Warrington of up to 2,500 homes;**
- : **Option 4 - A Garden City Suburb of approximately 4,000 homes & an urban extension to the south west of Warrington of up to 2,000 homes & urban extension to west of Warrington of up to 2,500 homes; and**
- : **Option 5 - A more dispersed pattern of Green Belt release adjacent to the main urban area.**

The Council selected Option 2 - A Garden City Suburb of approximately 6,000 homes and an urban extension to the south west of Warrington of up to 2,000 homes was the Preferred Option. This option is the subject of this round of public consultations.

1.5. Options Appraisal Criteria

The Council has identified its strategic objectives for the Local Plan.

They are:

- : *W1. To enable the transition of Warrington from a New Town to a New City through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:*
 - ***Delivering a minimum of 22,260 new homes (equating to 1,113 per year) between 2017 and 2037, and***
 - ***Supporting Warrington’s ongoing economic success by providing 381 Hectares of employment land between 2017 and 2037.***

- : *W2. To facilitate the sensitive release of Green Belt land to meet Warrington's long term housing and employment needs, whilst ensuring the revised Green Belt boundaries maintain the permanence of Warrington's Green Belt in the long term.*
- : *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.*
- : *W4. To provide new infrastructure to support Warrington's growth, reduce congestion and promote sustainable transport options, whilst reducing the need to travel and encouraging active lifestyles.*
- : *W5. To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, its unique pattern of green spaces and its constituent settlements whilst protecting, enhancing and embracing the borough's built and natural assets.*
- : *W6. To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality.*

From these strategic objectives, the Council identified 'Assessment Criteria' designed to **test the Council's decisions** and select a **'Preferred Option'**.

These criteria are:

- : Contribution to New City Concept
- : Green Belt implications
- : Supporting Role of Town Centre
- : Primary school implications
- : Secondary school implications
- : Health facility implications
- : Local Road Network
- : Strategic Road Network
- : Public Transport
- : Active Travel Open Space,
- : Sport and Recreation
- : Character implications
- : Environmental considerations & prudent use of resources
- : Delivery issues

From the above Assessment Criteria the following issues are highlighted and are discussed later in this report:

- : Greenbelt Implications (W2)
- : Strategic road network (W4)
- : Local road network (W4)
- : Public Transport (W4)
- : Delivery issues (All).

2. Greenbelt Implications

Position Statement

The Council has placed an over-reliance on the October 2016 Arup report. The report should be set aside and revisited before moving to the next stage of the Local Plan.

My clients request that an accurate assessment be made of greenbelt issues before moving forward in the plan making process **in line with the Landscape Institute's current view on this issue** (see Appendix 5).

2.1 Issues to be addressed in the October 2016 Arup Report

The following issues have been highlighted as requiring attention within the Arup report:

- : The status and accountability of the report;
- : The insensitivity of the Arup methodology;
- : Inconsistent results within the Arup reports; and
- : An incomplete process of greenbelt assessment.

2.2 The Status and Accountability of the Arup Report

The October 2016 Arup report is unsigned and the quality assurance verification is not available for scrutiny.

The status of the report is questioned given the health warning appearing on the title sheet of the report which points out that the report *'is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party'* for its use. That qualification calls into question the use of this document by the Council to support the Local Plan process as part of the public consultation.

Furthermore, the scoring system for the methodology is also challenged. Most importantly, it appears to rely **on a majority vote of the 'professional' assessors**. There appears not to be any record of who these assessors were, who were they employed by, how many assessors participated, who were they accountable to, what was their previous experience in this kind of work, what was their professional qualification and how was the vote split on each issue? This lack of accountability and transparency is a serious flaw in the report.

The public is entitled to know how much reliance it can place on this most important document, the decisions taken within the report and who the decision takers are.

2.3 Insensitive Methodology

In selecting the preferred option, the Council relies heavily on the October 2016 Arup report within which a greenbelt assessment methodology is described and the results of applying that methodology are recorded.

The purpose and functionality of greenbelt and greenbelt policy as described in the Arup report is recorded as follows:

1. To Check the Unrestricted Sprawl of large built up areas

This should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.

2. To Prevent Neighbouring Towns from merging into one another

*Green Belt is frequently said to maintain the separation of small settlements near to towns, but this is not strictly what the purpose says. Assessment of this purpose will be **different in each case and a 'scale rule' approach should be avoided**. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. A Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.*

3. To assist in safeguarding the countryside from encroachment -

The most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.

4. Preserving the Setting and Special Character of Historic Towns

This applies to very few places within the country and very few settlements in practice. In most towns, there are already more recent development between the historic core and the countryside.

5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.

The Arup report goes on to say that guidance further suggests that land which is assessed as making a relatively limited contribution to the Green Belt, or land that might be considered for development, would be where:

- : ***It is effectively 'infill' development;***
- : *It is well contained by the landscape;*
- : *It would cause little harm to the qualities that contributed to the distinct identity (#unsure of meaning) of separate settlements;*
- : ***It could create a strong boundary with a clear distinction between 'town' and 'country'.***

Whilst it is acknowledged that the assessment of landscape quality does not form part of the required assessment process for greenbelt functionality, there is a need to place a greenbelt assessment methodology within a proper context. That context should and must be rooted firmly in a finely grained understanding of the landscape character of the area, properly recorded and fully argued. The General Areas, as recorded in the Arup report appear arbitrary and are defined by nothing other than physical lines of separation. They are unsupported by a Character Assessment, and are distorted further by a series of random mergers.

The Landscape Institute methodology for assessing landscape character (LVIA) is commonly accepted as the industry standard and has been tested at many public inquiries. This part of the planning process is missing in assessing the greenbelt functionality. It is acknowledged that the 2007 Landscape Character Assessment goes **some way in making a 'whole town' assessment; but** that study is not fine grained enough to use sensitively as part of a greenbelt assessment and does not have enough detail to identify character areas for the Parcels Assessment.

Point 2 of the above criteria calls for a Character Assessment and on this foundation the greenbelt assessment methodology should be built. The Arup methodology appears not to do this, nor for that matter can I find any reference to the 2007 Landscape Character Assessment or any other Character Assessment within the Arup report.

Furthermore, and with particular reference to Area 10 as part of the General Area Assessment, the Arup methodology and report has chosen not to recognise the protection offered by greenbelt land to the **'greenbelt over-washed'** settlements of Grappenhall Village (a Conservation Area) and Stretton. The protection boundary chosen by Arup appears to ignore this effect and does not take this functionality into account at General Area level. Little wonder that the areas of land around these settlements

perform poorly in the General Area Assessment. And little wonder these areas perform better when assessed within the context of the Parcels Assessment when this effect is recognised.

In planning terms, I would request that the Council gives consideration to two simple questions:

- : Has greenbelt land and greenbelt policy protected Grapenhall Village from development beyond its boundaries?
- : Has greenbelt policy limited ribbon development along Stockton Lane (part of Stockton Lane having already been developed prior to greenbelt designation)?

The Arup methodology for assessing General Areas records that the protection offered by this greenbelt land as 'weak'. It is difficult to conceive how this position can be supported by the Council.

To the layman and the professional planner alike, the answer to both the above questions must be a resounding yes. A methodology that runs contrary to common sense should not be relied upon and needs to be reconsidered.

2.4 Inconsistent Results

As noted above, the General Area Assessment for Area 10 (part of the area for SWUE) is recorded as '**weak**'. The Parcels Assessment of the same area tested against the same criteria recorded a set of results that were at worst 'moderate' (8 parcels weak, 12 parcels moderate and 7 parcels strong). This inconsistency is further compounded when the Parcels Assessment is cross referenced against the results shown in the July 2017 Green Belt Assessment (Additional Site Assessments of call for Sites Responses and SHLAA Greenbelt Sites) report where the distribution of results for development areas conflicts further with the General Area Assessment (15 weak, 15 moderate and 4 strong). Again, at worst this would give an overall performance of '**moderate**'. Compounding this error, some of the results of these sites highlight further conflicts and inconsistencies compared with the results of the Parcels Assessment.

2.5 Incomplete Assessment Process

Whilst the Parcels Assessment as a check on the General Area Assessment is to be applauded within the context of the methodology chosen, the vital loop back into the assessment process for reassessing the status of General Area 10 after the Parcels assessment has been completed is not made, leading to a false set of conclusions. This is a very important omission, **as the grading of Area 10 as 'weak' has greatly influenced** the outcome of the plan making process. Indeed, the Arup report acknowledges in principle this conflict at paragraph 150, but fails to examine the impacts of the Parcels Assessment on the General Area Assessment and fails to reconsider the ranking of Area 10 in the General Assessment.

Had the process been completed, it is difficult to see how the grading of Area 10 would remain as 'weak'.

The assessment of greenbelt is now an issue of national importance. The Landscape Institute is currently taking a leading role in establishing a consistent methodology for assessment. This is summarised at Appendix 5 of this report.

3. Strategic Road Network

Position Statement

The highway proposals for the Preferred Option have not been properly tested to determine their effects on the Strategic Road Network. This runs contrary to the **Highway Agency's (now Highway England's)** stated requirement and as such could render the plan undeliverable (see Appendix 2).

My clients would request that all options are properly tested and reported on before moving forward to the next stage of the plan making process.

The Strategic Road Network [SRN] within Warrington comprises sections of the M6, M62 and M56. The M6 is the longest motorway in the UK and runs from the M1 at junction 19 to join the A74 south of the Scottish Border at Carlisle. The M62 runs from Liverpool to Hull, apart from the short section around the north of Manchester which is numbered as the M60. The M56 is the primary link from North Wales and the M6 to Manchester and Manchester Airport.

In response to the Core Strategy Options Report the Highways Agency submitted comments to the Council in August 2010 regarding the Core Strategy proposals.

The Highways Agency made it known that the above routes were of national importance and as such the Highways Agency would be concerned if any proposed development sites or land allocations were to have an adverse impact upon their safety and/or operation of the SRN. The Highways Agency further stated that,

"... the Agency would recommend that when looking at the impact at the SRN, focus should be placed upon the current operation of the network and the impacts resulting from land allocations contained within the emerging LDF. In addition to stress, 'level of service' performance indicators should form part of the evidence such as journey time analysis and average peak hour speed etc."

The Highways Agency then went on to say that,

"The next step is to identify the infrastructure (transport) shortfalls which need to be addressed to support and deliver the site allocations being promoted by the emerging LDF. If the LIP (Local Infrastructure Plan – my annotation) is to achieve this, and fulfil its purpose of providing a sound and robust evidence base to support the LDF, infrastructure provision and transport intervention need to be guided by outputs from the traffic model. This would enable co-ordination of development and infrastructure phasing which is requisite to deliver sustainable development and growth."

It is understood that the SWUE was tested against the provision of 2000, 4000 6000 and 8000 housing units, although crucially no traffic data is available. 4000 was considered the minimum number of units to deliver a new secondary school. The Council takes the view that smaller numbers would not generate sufficient development value to provide infrastructure (a secondary school) placing unacceptable pressure on existing schools, although it would appear that no account was taken of any shortfall requirements in the schools of other areas.

It is understood that 20 houses per hectare density for the Garden City concept is being used in establishing the spatial configuration. It is estimated that a further 2000 housing units can be accommodated within this area held as safeguarded land, giving an overall capacity of 8000 units at 20 units per hectare for the entire SWUE. This is a massive provision in one area occupying an area of 400 hectares only for residential development.

The Council accepts the need to provide infrastructure to support the southern extension, but is unclear what is to be provided and when. Recent discussion with Council officers reveal that the necessary multimodal transport assessment to deliver this information **has not been carried out. It is the Council's intension to do this work at** the next stage of the plan making process. My clients, and the Council for that matter,

are not in a position to judge whether the proposal will work and whether the Council **can deliver the plan's objectives until this work** is completed. It is therefore difficult to understand how the Preferred Option has been adequately tested.

However, it is possible to take some clues from the information so far provided. To do this I refer to the SWUE Framework Plan (June 2017). Within this report, the Council states that,

"... However, the surrounding road network cannot accommodate any further development traffic without significant infrastructure improvements. The initial phases of the proposed strategic road will therefore need to be completed before any further residential development comes forward. It is also important to stress that the Secondary school will need to be completed by the end of phase 2 given capacity constraints on secondary school places across south and central Warrington."

Close inspection of the infrastructure phasing in the same document reveals that a new crossing of the Manchester Ship Canal will not be started until Phase 3. Given the size and complexity of that project, it is reasonable to assume that it will not be available until the end of that phase of the plan, some 15 year after commencement of the plan. The only conclusion that can be drawn is that all public transport links and the road links for approximately 4500 houses and local services must be hung from the existing highway network (it is accepted that other enabling roads will be built, but these all lead to the existing road network). This is a major flaw in the plan and is likely to place unacceptable pressure on the Local and Strategic Road Networks, none of which has been properly tested. **This runs contrary to the commitment given in the Council's Regulation Scope and Contents Document dated October 2016 which stated at paragraph 25 (my emboldenment),**

"2.25 The Council is in the process of updating its Multimodal Transport Model and Strategic Flood Risk Assessment. These pieces of work will feed into the broader assessment of development options under the Sustainability Appraisal process and the development site assessment as set out in Appendix 2."

The Council has failed to honour this commitment. When questioned at the recent consultation events (September 2017), Council officers were quite open about the fact that the computer model has yet to be completed.

4. Local Road Network

Position Statement

The local highway proposals for the Preferred Option have not been tested to determine the effects on their capacity to carry the required traffic loadings or knock-on effect on **the Strategic Road Network. This runs contrary to the Highway Agency's (now Highway England's)** stated requirement and as such could render the plan undeliverable.

Please ensure that all options are properly tested and reported on before moving forward to the next stage of the plan making process.

In the same consultation communication referred to above, the Highways Agency stated,

"...there is no assessment of capacity of these local roads or the current and projected levels of service on the local network. The Agency would recommend that such an assessment is provided in order to give some level of assessment of capacity on the local road network. This is especially important where the SRN forms part of a route in conjunction with the local road network or where the SRN provides an alternative to a local route."

The Highways Agency went on to say,

"The next step is to identify the infrastructure (transport) shortfalls which need to be addressed to support and deliver the site allocations being promoted by the emerging LDF. If the LIP (Local Infrastructure Plan, my annotation) is to achieve this, and fulfil its purpose of providing a sound and robust evidence base to support the LDF, infrastructure provision and transport intervention need to be guided by outputs from the traffic model. This would enable co-ordination of development and infrastructure phasing which is requisite to deliver sustainable development and growth."

I can find no evidence of this work being carried out and as such the viability and relative performance of the Preferred Option cannot be adequately tested.

5. Public Transport

Position Statement

By not carrying out a multimodal transport assessment as part of the Preferred Option selection, the Council cannot demonstrate that the plan is deliverable, with particular reference to the strategic bus routes.

The Council confirms that it has not carried out a multimodal transport assessment. Therefore, we must rely on the information provided in the supporting documentation at this stage in the Plan Making Process. Figure 7 of the Preferred Development Option Regulation 18 Consultation (see Appendix 1 of this report) indicated public transport routes crossing the sports pitches and the athletics area adjacent to the Bridgewater Canal (Grappenhall) and then across the Bridgewater Canal itself (in 3 places). It is assumed that these are only notional routes given that they are indicated as a dashed line.

We must therefore turn to an alternative source of information. The strategic bus routes as recorded on the Framework Plan (Figure 3.6) of the South Warrington Urban Extension Framework Plan Document (see Appendix 3 of this report) does give a more accurate record. The plan demonstrates that only 2 strategic bus routes out of the SWUE are proposed. One routed over the new crossing of the Manchester Ship Canal to be provided 15 years into the plan (see Section 3 of this report) the other leaving SWUE via Stockton Lane and through the Lumb Brook aqueduct under the Bridgewater Canal.

Therefore, this plan confirms that for 15 years the entire strategic bus route system for SWUE serving the existing and proposed development is routed along Stockton Lane. Stockton Lane itself is currently closed because it is a dangerous road (see Appendix 4 of this report). The strategic bus route then appears to run under the Bridgewater Canal through Lumb Brook aqueduct (a Grade II listed structure). At this point, all traffic moves through the aqueduct on a single file/single direction road controlled by traffic lights. Quite frankly, if this was not such a serious matter, the proposal would be laughable. Little wonder this part of the Preferred Option plan is recorded as notional by a series of dashed lines.

This strategic bus route is totally unsuitable and yet it is fundamental to the plan. Had a proper multimodal transport assessment been carried out, I am confident that this would have demonstrated that the connectivity between SWUE and Warrington town centre and the north was undeliverable, calling into question the deliverability of the plan.

6. Deliverability

Position Statement

The Council has failed to demonstrate that the Local Plan is deliverable.

The National Planning framework (NPPF) sets out the criteria within which the preparation of the Local Plan must be prepared.

Paragraph 173 of the NPPF headed Ensuring viability and deliverability states,

; Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Furthermore, Paragraph 177 states.

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.

The NPPF makes it clear that it is for the Council to demonstrate the deliverability of the Local Plan. For reasons given in the previous sections of this report, the Council has failed to do this nor has the Council provided proper costings to demonstrate that the infrastructure necessary to facilitate the development can be funded.

7. Conclusion

Position Statement

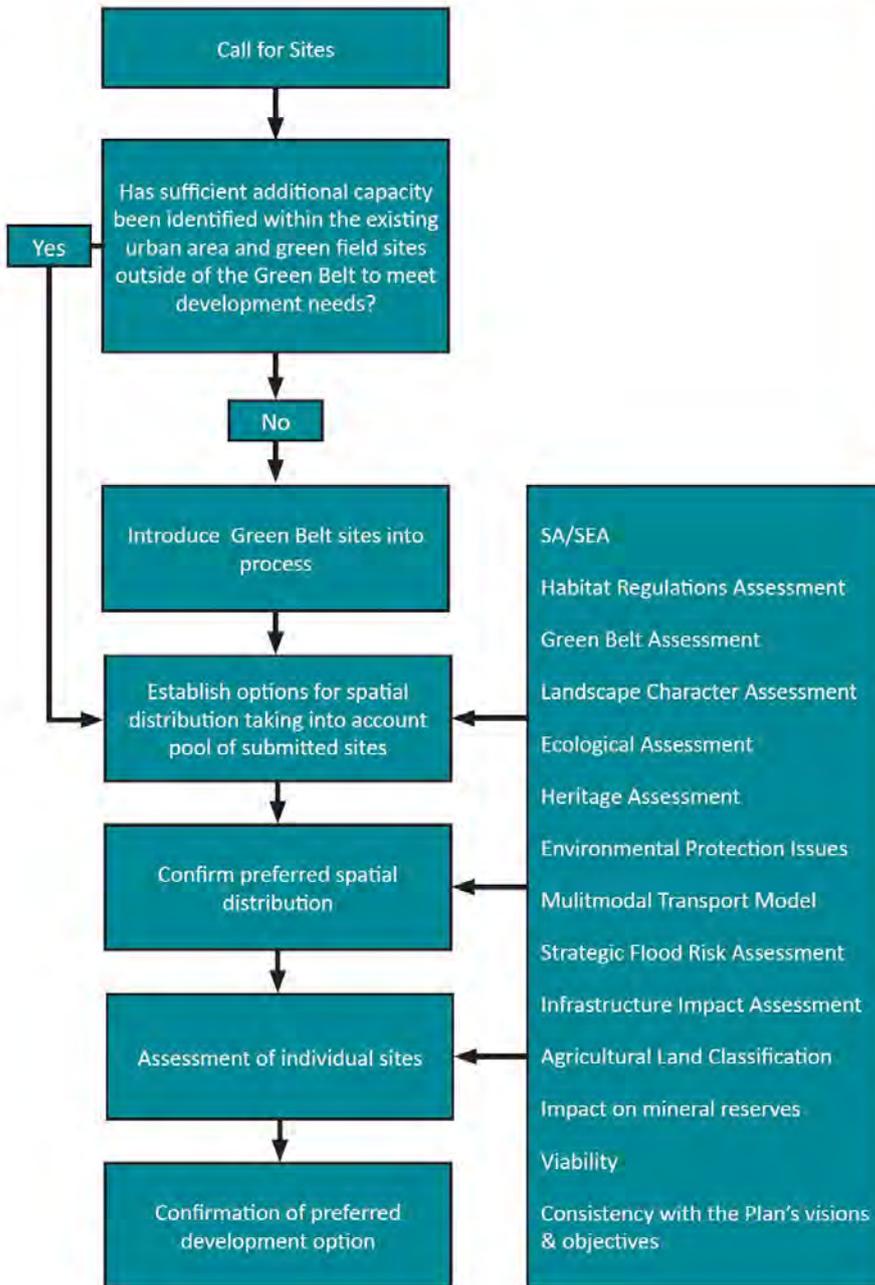
The Council is urged to reassess the decisions taken and further investigate the selection of a Preferred Option.

From the strategic objectives, the Council identified 'Assessment Criteria' designed to **test the Council's decision**. Within the context of this report, the following issues were selected and were investigated:

- : Greenbelt Implications;
- : Strategic road network;
- : Local road network;
- : Public Transport; and
- : Delivery issues.

In addition, the Council made a commitment in the Local Plan Review: Regulation Scope and Contents Document dated October 2016 to proceed as described below.

Appendix 2: Spatial Distribution and Site Assessment Process



Reg. 18
Scope & Contents
Document
October 2016

It is clear from the above flow diagram that an up-to-date Landscape Character Assessment, an Ecological Assessment, a Multimodal Transport model and an Infrastructure Impact Assessment (to name but 4 reports) were to be carried out to feed

into establishing options for spatial distribution taking into account the pool of submitted sites. These documents are not available to the public and I can find no evidence that the work has been carried out. Indeed, the Multimodal Transport Model that has been lodged on the evidence base section of the **Council's** web site is for the previously prepared Local Plan, now defunct. **This is a serious departure from the Council's Local Plan Review** and potentially affects the legitimacy of the work leading to the Preferred Option selection.

The outcome of the investigations carried out to date indicates that the selection process **leading to the 'Preferred Option'** is seriously flawed. These deficiencies, limited only to the selected topics so far investigated, can be summarised as follows:

Greenbelt - The Council has placed an over-reliance on the October 2016 Arup report. The report should be set aside and revisited before moving to the next stage of the Local Plan. My clients request that an accurate assessment be made of greenbelt issues before moving forward in the plan making process.

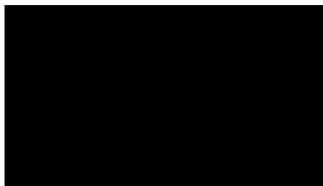
Strategic Road Network - The highway proposals for the Preferred Option have not been properly tested to determine their effects on the Strategic Road Network. This runs **contrary to the Highway Agency's (now Highway England's) stated requirement and as such** could render the plan undeliverable. My clients would request that all options are properly tested and reported on before moving forward to the next stage of the plan making process.

Local Road Network - The local highway proposals for the Preferred Option have not been tested to determine the effects on their capacity to carry the required traffic loadings or knock-on effects on the Strategic Road Network. This runs contrary to the **Highway Agency's (now Highway England's) stated requirement and as such could** render the plan undeliverable. Please ensure that all options are properly tested and reported on before moving forward to the next stage of the plan making process.

Public Transport - By not carrying out a multimodal transport assessment as part of the Preferred Option selection, the Council cannot demonstrate that the plan is deliverable, with particular reference to the strategic bus routes.

Deliverability – In not satisfying the above criteria, the Council has failed to demonstrate that the Local Plan is deliverable and as such should revisit the selection of a Preferred Option, before moving forward with the local plan in line with NPPF policy.

Signed:



Harry Shipley MRTPI FLI
Head of Planning and Sustainable Development

Appendix 1: Warrington Garden City Suburb

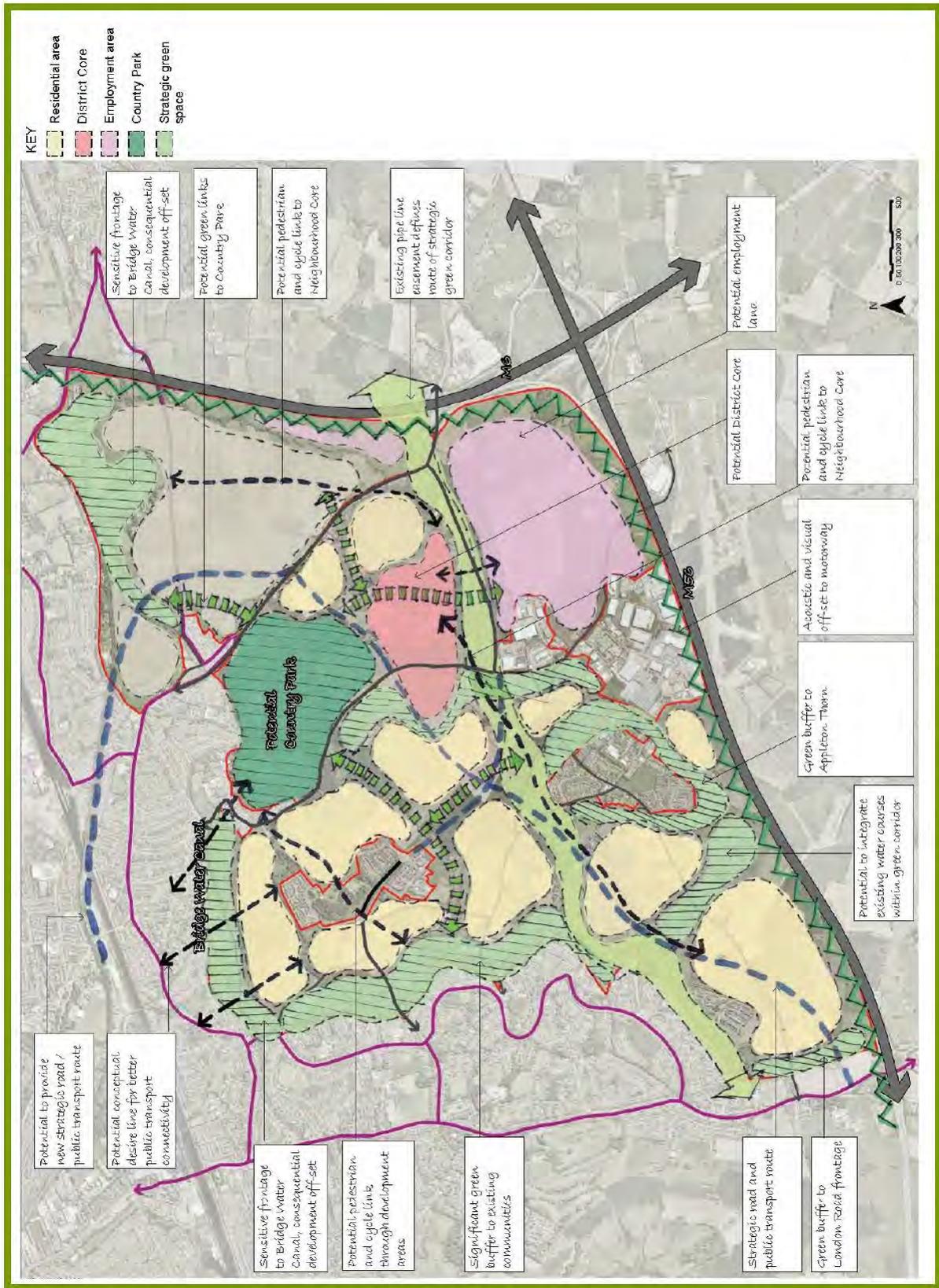


Figure 7: Warrington Garden City Suburb

Appendix 2: Highways Agency response to the Core Strategy

Core Strategy Objectives and Options Report of Consultation (August 2010)

Victoria Ridehaugh of the Highways Agency (August 2010)

Thank you for the opportunity to comment on the above document, we have limited our comments to the Transport section as we did not feel that we needed to comment on the utilities infrastructure, social infrastructure or environmental infrastructure sections.

The Strategic Road Network [SRN] within Warrington is comprised of sections of the M6, M62 and M56. The M6 is the longest motorway in the UK and runs from the M1 at junction 19 to join the A74 south of the Scottish Border at Carlisle. The M62 runs from Liverpool to Hull, apart from the short section around the north of Manchester which is numbered as the M60. The M56 is the primary link from North Wales and the M6 to Manchester and Manchester Airport. These routes are deemed to be of national importance and as such the Agency would be concerned if any proposed development sites or land allocations were to have an adverse impact upon their safety and / or operation.

Moreover, the Agency should be concerned if, through land use planning policy, the development of land were to increase levels of traffic on the network to those which could potentially create capacity problems in the future.

Public Transport: Rail

We note the ICA reports that usage of the 6 rail stations within the borough has grown in 2007/8 but does not state how this level of usage relates to the capacity of the services. The Agency considers that it would be beneficial to include information on the capacity of the services so as to provide an indication of the level of spare capacity on the rail network. This would help to focus priorities for any future improvements.

Plans for construction of an additional rail stop at Chapelford Urban Village are welcomed by the

Agency, as are aspirations for the Borough to benefit from the electrification of the Great Western Mainline and future High Speed Rail Link, through improvements to the accessibility of the North-West region.

Public Transport: Bus

The Agency welcomes the improvements to bus stops in the Borough over the last few years, which has included easy access kerbing and real time passenger information boards and also schemes such as that implemented at Chapelford in partnership with the developers, whereby all householders are offered two 6-monthly or one 12 monthly travel pass providing free travel on the whole WBT network.

The Agency would recommend that an assessment to identify gaps in the bus network be undertaken as part of the ICA, and whether these could be filled through future infrastructure improvements, to reduce the trip burden on the SRN. This is particularly important for large sites close to the SRN that are to be promoted for future development through the LDF process.

Highways: Strategic Road Network

We note the ICA includes the Agency's stress maps from the Regional Network Reports, however we would recommend that the daily stress is defined within the report in terms of the time period it covers (i.e. is it peak hours, 18 hours, 24 hours etc). Taking into account the current and projected network (stress) condition of the M6, M62 and M56,

the Agency will not be able to support unsustainable land allocations located close to the SRN.

Sites being promoted through the emerging LDF will need to be supported by the appropriate sustainable infrastructure and be accessible by public transport, cycling and walking to reduce the need to travel by private car. Moreover, the Agency would recommend that when looking at the impact at the SRN, focus should be placed upon the current operation of the network and the impacts resulting from land allocations **contained within the emerging LDF. In addition to stress, 'level of service'** performance indicators should form part of the evidence such as journey time analysis and average peak hour speed etc.

Highways: Local Road Network

The ICA reports that all other roads apart from the SRN are managed by the Local Authority, however there is no assessment of capacity of these local roads or the current and projected levels of service on the local network. The Agency would recommend that such an assessment is provided in order to give some level of assessment of capacity on the local road network. This is especially important where the SRN forms part of a route in conjunction with the local road network or where the SRN provides an alternative to a local route.

Private Car

It is stated within the ICA that highway network in Warrington has to deal with considerable traffic movements on a daily basis, particularly in the morning and evening peaks. These traffic movements are growing with development and redevelopment pressures both within and outside the Borough.

In terms of personal transport, car ownership is higher in Warrington than the rest of the North West with 36% of households having 2 or more cars or vans. Continued and sustained traffic growth is of concern to the Agency as it may place increased pressure on the SRN in the Borough. The Agency would therefore emphasise the importance of ensuring new development is served by sustainable transport infrastructure to help reduce the number of private car trips. This can also be achieved by wider travel planning measures.

Parking Provision

WBC controls a total of 19 car parks throughout the Borough serving the Town Centre, District and Local communities. The main public parking provision is concentrated within the Town Centre, though there are major provisions at Birchwood and Westbrook Centres. The Council owns and manages a number of car parks in and around the town centre. There are a total of 5,616 spaces for public use, of which the Council controls approximately 17%. The ICA would benefit from an assessment of the car parking capacity, in order to consider whether the existing provision is sufficient.

Car parking can play a key role in defining the modal choice when making a trip. Whilst it is unlikely that a car parking strategy within the Borough will impact upon the SRN, it should complement the wider sustainable travel initiatives which will be required to support the emerging LDF.

Cycle Routes

The ICA describes Warrington's Cycle Map Guide which has been distributed to every household in the Borough and provides a map which categorizes the entire highway network according to the degree of skill and experience needed for cycling. We note however, that no mention is made of the adequacy of the cycle network, how it relates to cycling demand, or where there may be significant gaps in the network.

Public Rights of Way

The Agency welcomes Warrington's Rights of Way Improvement Plan which is being implemented as this should help to encourage pedestrian and cycle travel.

Conclusion and Summary of Key Considerations

The Agency welcomes the opportunity to respond to this current consultation, especially as we are already working alongside WBC in the process of developing a traffic model for the Borough, which will help to inform the future highway infrastructure requirements within the Borough.

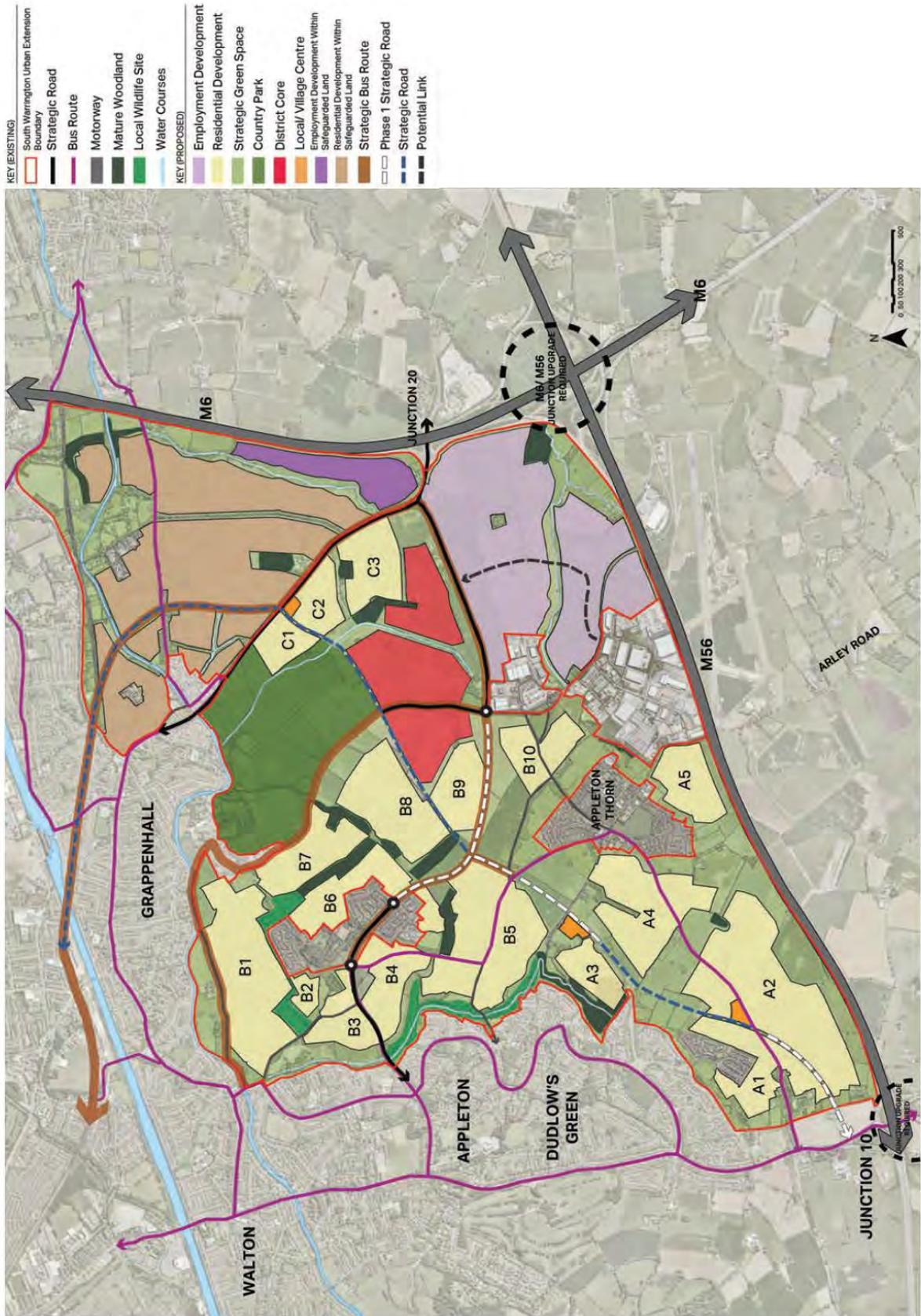
The next step is to identify the infrastructure (transport) shortfalls which need to be addressed to support and deliver the site allocations being promoted by the emerging LDF. If the LIP is to achieve this, and fulfil its purpose of providing a sound and robust evidence base to support the LDF, infrastructure provision and transport intervention need to be guided by outputs from the traffic model. This would enable co-ordination of development and infrastructure phasing which is requisite to deliver sustainable development and growth.

Overall, the Agency are encouraged by the work undertaken by WBC at this stage, and would seek to continue to work in partnership to ensure that the transport evidence base and supporting Local Infrastructure Plan is sound and robust, and that any transport infrastructure identified to support the spatial planning of land allocations is evidence based.

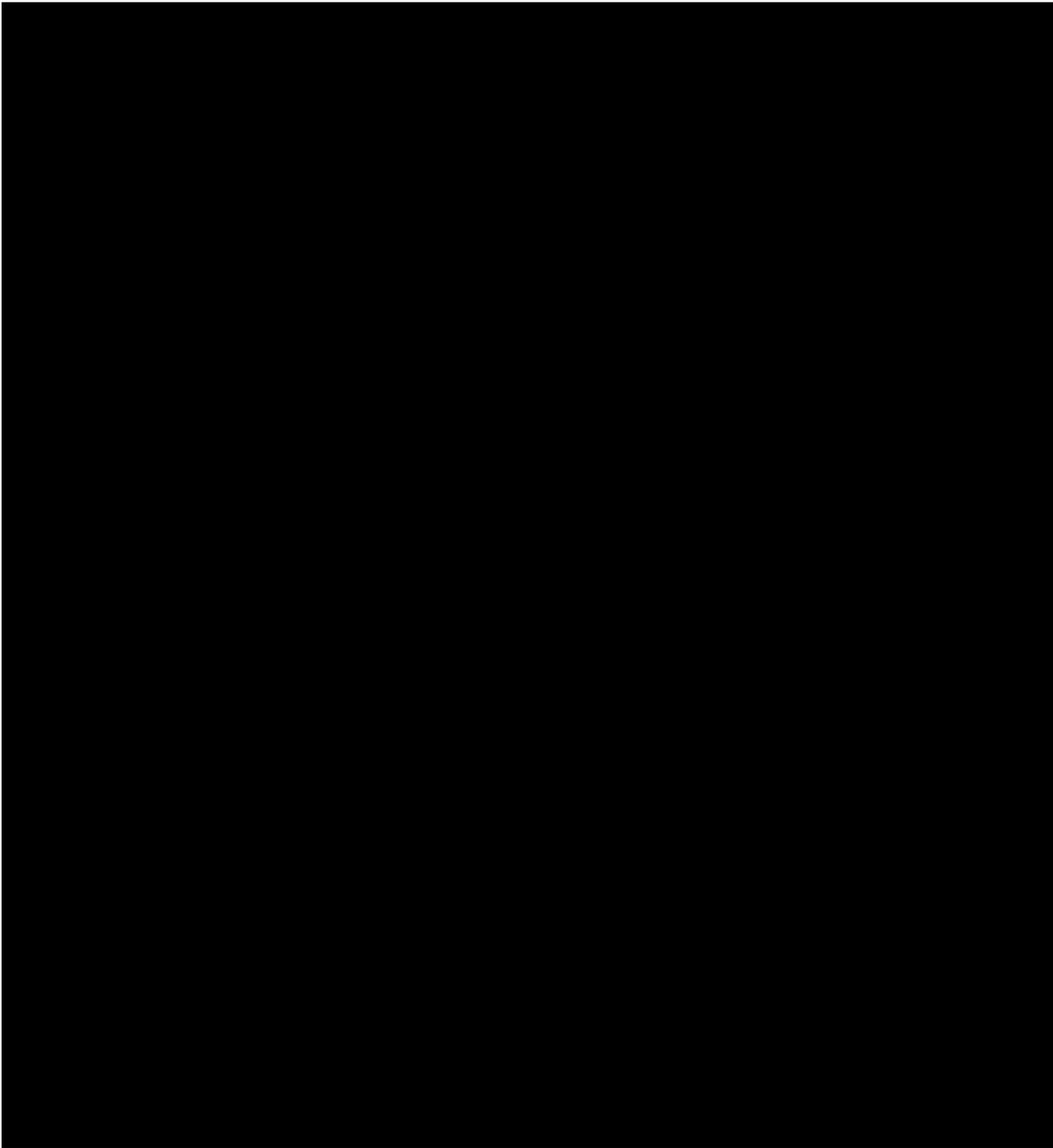
The Council's Response to the Highways Agency Letter

All comments welcomed and noted. As the infrastructure evidence process progresses, further consultation with stakeholders will be undertaken to make them aware of key development sites and question whether there may be any infrastructure issues as a result of these. Capital Programmes and will also be assessed in order to produce an infrastructure schedule.

Appendix 3: Framework Plan (Figure 3.6) of the South Warrington Urban Extension Framework Plan Document.



Appendix 4: Accidents at Stockton Lane



Appendix 5: Landscape Institute Draft Position Statement (Undergoing **members' consultation**)

Current status and strength of the Green Belt

The fundamental principle of Green Belt, to maintain openness, i.e. keeping land free from buildings, is robustly defended by Planning Law, national planning guidance, precedents and case law. At the core of this designation is the 'in perpetuity' requirement, that Green Belt boundaries will be maintained for much longer than the usual 15 or 25 year local plan period. In the past, county, regional and sub-regional planning authorities adopted robust policies to safeguard Green Belt; local authorities relied on these strategic cross-boundary policies. Since Regional Spatial Planning was abolished in 2011, these strategic safeguards have been dismantled and, because of the loss of these over-arching policies, many local authorities now see the need to review the Green Belt as part of their Local Plan process.

Green Belt reviews currently underway in many areas will almost certainly bring about significant changes in the extent of existing Green Belt, without any changes to national policy. We anticipate this process will result in the release of extensive areas of land from the Green Belt designation in future years. The Landscape Institute is particularly concerned that, in the review process, these individual local authorities have no model methodology or protocols to follow, so the outcomes in terms of qualitative analysis tend to be inconsistent from one area to the next. The Landscape Institute is aware that current government policy, underpinned by the principle of localism, delegates decision-making to those who we believe may be least able to take a strategic view of Green Belt. Despite the legal duty to cooperate, we consider that Local Plan teams, Neighbourhood Plan groups and local politicians may be too constrained by local politics to take the decisions needed to protect and enhance this valuable resource, and to ensure that it functions to best advantage.

Extract taken from LI Briefing Paper on Green Belt - Final draft for member consultation