

## **Warrington Borough Council's Local Plan**

### **Preferred Development Option**

#### **Regulation 18 Consultation - July 2017**



I wish to object to the proposals of the PDO for the reasons given below. In this response I have attempted as far as possible to follow the logical flow of the PDO itself. The views I express are my personal views and do not necessarily represent the views of the Grappenhall and Thelwall Parish Council.

Abbreviations used in my response are shown below;

CPO	Compulsory Purchase Order
MSC	Manchester Ship Canal
PDO	Preferred Development Option
TPT	Transpennine Trail
VDS	Village Design Statement
WBC	Warrington Borough Council

### **1. Development Needs**

#### **1.1 Housing Numbers**

The driving force for the Local Plan Review which has led to the PDO and the current consultation that WBC is now engaged in, would appear to be the need for housing. Sections 2.8, 2.9 and 2.21 of the PDO contain four different figures for the number of homes required per annum over a 20-year period; 839, 955, 1113 and 1332. In Section 4.7, the figure to be used for development of the PDO is given as 1113 homes per annum. There is no clear indication of the process by which this particular

housing number was selected and this is unsatisfactory. The method of calculating how much Green Belt land should be released (section 4.11) shows that the need for Green Belt release is very sensitive to the housing figure and therefore a soundly-reasoned justification for the figure used should be provided. I suggest that use of the OAN number (955 homes per annum, see Section 4.14) would be more appropriate.

## 1.2 Housing Density

In Section 5.36 the PDO indicates that WBC is far from clear about the types of housing required and indeed seeks views on this issue. But how can the PDO come to a conclusion about the amount of Green Belt land to be released if this issue remains undecided? The assumption of the PDO is 20 dwellings per hectare (Section 5.35). If other types of housing, such as housing for single people, young families and the elderly, were considered it would be possible to reduce the overall demand for land. This however has not been done.

## 1.3 Available land - the Fiddlers Ferry Site

The attitude of the PDO to the Fiddlers Ferry site (Sections 4.13, 4.24) is unclear. It is a very large site and its availability or otherwise for housing during the plan period should be established at least for the purposes of the PDO since the consequences for housing calculations are very significant. In view of repeated assurances by the Government on the limited life of coal-fired power stations I believe that the Fiddlers Ferry site should be treated as available. If this proves not to be the case then the size of the site would justify revisiting the calculations of the PDO. This ambiguity should be firmly addressed.

## 1.4 Conclusion on housing needs, land requirement and Safeguarded Land

In summary I believe that there is great uncertainty in the figures for housing need and that it is highly unsatisfactory to propose release of land from Green Belt, an irreversible step, on the basis of the figures provided in the PDO. There is certainly nothing in the PDO that comes close to demonstrating the 'exceptional circumstances' required by the NPPF to support release of land from Green Belt. In Sections 4.19 and 5.4 it is suggested that the PDO contains that justification but I looked for it in vain.

This weakness, and the lack of robustness in the calculation of land requirements referred to above, make rational support for the 20-year proposals of the PDO impossible. This conclusion applies also to the proposals for Safeguarded Land (Sections 4.20 - 4.24, 5.37). If the justification for the 20-year proposals is weak, it follows that the justification for the proposals on Safeguarded Land, which are merely an extension of the 20-year proposals, is similarly flawed.

I suggest that the data provided in the PDO lacks the substance that would be required to justify the irreversible step of releasing land from the Green Belt. I believe that the PDO is greatly premature and I request that it be withdrawn.

## **2. Strategic Objectives**

I do not support the concept of Warrington New City (W1). I am not aware that there has been adequate public consultation on the concept and I personally I know no members of the public that support it.

I do not support Objective W2 which seeks to facilitate 'sensitive release of Green Belt'. It seems to me that release of Green Belt should not be an objective in its own right; in making it an objective, WBC has shamefully betrayed its obligation to defend the Green Belt, which has been established by due process and is therefore to be considered durable. WBC's task is to defend the Green Belt, not dismantle it.

With regard to objectives W3 - W6, I note the goal of providing new infrastructure for the town (W4) and minimisation of the impact of development on the environment and the improvement of air quality (W6). I will return to these issues later in this document.

## **3. High Level Spatial Options and Main Development Locations**

### **3.1 High Level Spatial Options**

In this context I refer with his permission to the report on the PDO by [REDACTED] on behalf of a group of his clients. Section 4 of the PDO explains the process by which the PDO was developed; Stages 3 (4.44 *et seq*) and 4 (4.57 *et seq*) of that process assess the high level spatial options to accommodate development and the options for the main development locations. [REDACTED] concludes that in this process, too much reliance has been placed on the Arup Report of October 2016. I accept his reasoning and his conclusion and I support his request that the Arup Report be set aside. In particular I note his comments on the need for Character

Assessment of landscape, which did not form part of the Arup assessment. For my own part, and in support of his conclusion, I am aware that the chief characteristic of Green Belt is openness. The land now proposed for release from the Green Belt in the PDO has this characteristic more than any other part of Warrington's Green Belt; this is evident to even the casual traveller entering Warrington by taking the A50 from M6 Junction 20. On both sides of the road there is open farmland and long views. It is classic Green Belt and it is obvious that in this area the Green Belt has succeeded in preventing urban sprawl, whatever conclusion the Arup Report may have reached. It is astonishing to me and I think to the general public that a supposedly serious assessment of Green Belt can come to a conclusion that is so much at odds with common sense.

The value to the Green Belt of the land identified for development in the PDO is thus the subject of a flawed assessment. For a more balanced view, the Village Design Statement for Grappenhall and Thelwall of 2003, adopted by WBC as Supplementary Planning Guidance, has a bearing on the Green Belt issue. Thelwall Heys (destined to be safeguarded land in the PDO and therefore to be removed from Green Belt) is described on p15 as a 'unique piece of unspoilt farmland' and the VDS strongly supports the Green Belt designation. The settlement on Weaste Lane (to be bisected by the strategic road), receives strong support (p16) and Chapter 6 'Rural Environment and Recreation' deals *inter alia* with Topography and Landscape and Wildlife. The VDS receives no mention in the PDO or in the Arup Report.

██████████ argues that the Arup Report used only criteria derived from the objectives of the Green Belt, whereas it should have also included Character Assessment. I agree with him and would add that the consideration of the VDS should have been included and was not.

3.2 Also in the context of the PDO's High Level Spatial Options, I believe there is a further issue as well as the one highlighted by ██████████; that issue is the deliverability of infrastructure. By this I mean that the road network of South Warrington is subject to limitations imposed by the waterways that flow through the area. This has consequences for potential new settlements or the expansion of older ones because such settlements require infrastructure and the delivery of that infrastructure will be affected in its feasibility and cost by those limitations. To fail to take account of these limitations is to render the PDO unrealistic.

Section 4.49 of the PDO indicates that Option 2 proposes that the majority of Green Belt release should occur adjacent to the main urban area, and in Section 4.53 this option is confirmed as WBC's preferred option. This is based on the Strategic Objectives (Section 4.38). The primary reason for favouring Green Belt release

adjacent to the main urban area appears to be that it supports objective W1, the New City concept. No reason is provided for making this connection, however, and I suspect that the true reason is that it 'looks neat on the map'. The deliverability of infrastructure is not perceived as an issue and no limitations are considered.

Thus it is that in Stage 4, Main Development Locations, Section 4.65, Option 2, a Garden City Suburb placed in Grappenhall emerges as the preferred site which performed best when set against the declared strategic objectives. Section 4.64 says of Option 2, 'this option has the...ability to provide infrastructure to support the Garden City Suburb....and the town as a whole'. Certainly the Garden City Suburb is geographically adjacent to the main urban area but that does not mean that it is well-connected to the main body of the town. In fact, because of the particular difficulties with road traffic in Warrington south of the Mersey, Grappenhall is poorly connected to the main body of the town. The detail provided in connection with the Garden City Suburb proposed for Grappenhall suggests that the limitations affecting the delivery of infrastructure in south Warrington have been entirely ignored in the process by which Grappenhall was selected. I give more detail of my view of this issue in Section 3.3 below.

I therefore believe the process of identifying main development locations is flawed. The logical process by which the site of the putative Garden City Suburb was selected is obscure and far from transparent. In my opinion there should have been a clear criterion of deliverability of infrastructure in the strategic objectives and any obstacles to deliverability should have been highlighted in the Settlement Profiles exercise. Without such a criterion, the process is flawed and as a result the Grappenhall site chosen for the Garden City Suburb in the PDO cannot in my opinion deliver what is promised for the town as a whole because the realities of road transport in Warrington have been entirely ignored. In short, the PDO has been prepared as if the MSC and the River Mersey simply did not exist.

Because the Strategic Objectives do not refer to deliverability but also the Settlement Profiles are of too narrow a scope, it has thus been possible to reach a point where a proposal has been made for a major development (the Garden City Suburb in Grappenhall) which cannot be supported by existing infrastructure and, despite many suggestions in the PDO that the Garden City Suburb will improve the town's general infrastructure, actually contains no credible proposal for improving the town's infrastructure as a whole. In other words, the aspirations of 5.3 that the PDO must ensure 'that new areas of development are .....part of a comprehensive plan to secure the wider infrastructure required to address congestion.....of Warrington as a whole' are simply not fulfilled. In short, the PDO evidently fails in its own terms.

### 3.3 Deliverability of Infrastructure

I wish to expand on my earlier point about deliverability of infrastructure to make a general point about road transport in Warrington which supports my earlier comments.

3.3.1 Travel by road in South Warrington is dominated by the three roads from the south (A50, Knutsford Road; A49, London Road; A56, Chester Road), all of which cross the MSC on two-lane Victorian swing bridges. The swing bridges are owned by Peel Holdings which operates the MSC as a commercial waterway and the bridges swing to permit ships to pass up and down the MSC at times controlled by Peel. Peel Holdings is known to be intending to increase traffic on the MSC. This fact means that there is frequent congestion at the crossing points and that congestion, even without further development in the south of the town, is certain to get worse.

3.3.2 Traffic that has crossed the MSC on the three main roads from the south then converges at Bridgefoot. Bridgefoot is at present the sole crossing point of the River Mersey in Warrington and performs two functions: it allows travellers access to the town centre and it also distributes vehicles coming from the south to destinations north of the Mersey, e.g; Widnes to the west, Newton-le-Willows to the north and Irlam to the east. These two functions compete with one another and the accompanying congestion is familiar to all citizens of the town, and visitors to it.

3.3.3 If we assume that congestion ought to be relieved and again assuming that it is desirable for major development to be facilitated, a strategic plan for new roads crossing both MSC and the Mersey is required. Unless such a plan is included in the PDO, the plan of the PDO for major new development south of the MSC will produce a new suburb that is part of Warrington on the map but as remote from it in journey time, as for example, Appleton is today. I know people who live in Appleton and shop in Northwich because for them the journey time to Northwich is shorter than it is to the centre of Warrington. The residents of the Grappenhall Garden City Suburb will presumably come to the same conclusion and we will find that the Green Belt of South Warrington has been sacrificed but the town is no better off. Only the developers will be happy. In various places the PDO seems to recognise this and indeed in Section 5.3 it says it is important the the PDO not only ensures that 'new areas of development are well served by local infrastructure but are part of a comprehensive plan to secure the wider infrastructure required to address existing congestion'. In Section 4.64 it is said of Option 2 'it will contribute to the New City

concept, having the ability to provide infrastructure to support the Garden City Suburb ....and the town as a whole’ and ‘the scale of the Garden City Suburb is of a sufficient magnitude to be able to deliver necessary infrastructure...’ Similar statements are to be found in Section 4.6 where it is indicated that ‘the Garden City Suburb can address the severe congestion which impacts on the town’. There is a further suggestion that this may be the ‘exceptional circumstances’ that justify the release of Green Belt. This makes a brave sound but the argument must be rejected because in point of fact the proposals for the Grappenhall Garden City Suburb in the PDO contain nothing that would address the congestion problems and infrastructure of the town as a whole.

### 3.4 Proximity to Motorways

I question the wisdom and justification for large-scale residential development so close to the intersection of two major motorways. I suggest that had air quality been a criterion for site selection (it is objective W6 and should have figured explicitly in site assessment), the Grappenhall site now proposed would have been ruled out.

### 3.5 Drainage, Flood Risk

Areas of Warrington bordering the MSC and the Mersey are low-lying and historically prone to flooding. The Grappenhall Garden City Suburb will replace large areas of agricultural land with hard surfacing and is bound to change local drainage patterns. The land slopes down northwards from the Grappenhall Garden City Suburb to the MSC and Mersey and there is an obvious potential for exacerbating flood risk in the area to the north of the Garden City Suburb. This issue is not addressed in the PDO.

## **4. Detailed comments on the proposals of the PDO for the Garden City Suburb**

### 4.1 The new strategic road

With regard first to infrastructure and with the above promises for the ‘town as a whole’ in mind, one may look at the detail of proposed road infrastructure in Figs 7 and 10 of the PDO. There is a new strategic road that starts at the Stretton junction of the M56 (J10) and proceeds to the north east until it meets the Transpennine Trail (TPT) which was previously a railway line. The new road then follows the line of the TPT and crosses the MSC on the disused high-level railway bridge near Latchford

Locks to end in the back streets of Latchford. There is no credible route set out for onward travel to Bridgefoot or anywhere else.

Objections to this strategic road and particularly to the use of the old high-level railway bridge near Latchford Locks, have understandably been the focus of criticism by the public which is summarised as follows -

- it cuts right through the GreenBelt. It first passes through the southern part of Grappenhall and then Thelwall Heys, which is proposed as Safeguarded Land;
- it removes a section of the TPT in Thelwall Heys, which is simply unacceptable to TPT users and is the subject of adverse comment by the TPT Office;
- any section of the TPT removed for the strategic road will have to be replaced by an alternative, superior, route at WBC's cost;
- it will require extensive and costly CPOs and demolition of property and the consequent loss of existing housing must be set against the target number of the PDO;
- it will adversely affect the quality of life in Grappenhall and Thelwall (air quality, noise);
- there will be a negative impact on wildlife;
- no Multimodal Traffic Assessment has been conducted;
- no engineering feasibility assessment has been carried out;
- no cost has been established and no funding arrangements are indicated in the PDO. In fact the South Warrington Settlement Profile contains a recognition of the funding issue and says, 'It is likely that other sources of funding (over and above what may be received from developers) would be required to deliver the full infrastructure requirements of a Garden City Suburb of this scale and more detailed work will be required to understand infrastructure costs and other potential funding sources'.

#### 4.2 Congestion

The PDO is unacceptably vague in the crucial area of the relief of congestion both locally and in the town as a whole, which WBC has identified as a central issue -

- WBC's comprehensive plan for transport infrastructure (5.3) is not presented in the PDO, or referred to in any detail;
- details of the town-wide measures to ameliorate congestion are not provided;



- the Development Concept referred to in the PDO (5.31) is not provided;
- the Infrastructure Delivery Plan (6.4) is not yet available;
- no traffic modelling information has been provided in the PDO;
- the use of the old railway bridge (also referred to above, Section 4.1 of these comments) near Latchford Locks as a strategic road is shown on maps (figs 7 and 10) but not referred to in the text and no information about the technical feasibility of this proposal is provided. It is implied in the PDO that the use of this bridge may or may not be possible. Furthermore, Fig 7 shows the road ending in the suburbs of Latchford; Fig 10 shows it carrying on hopefully towards Bridge Foot. Clarification of this vague proposal is essential.
- 'aspirations for a new Ship Canal crossing to the east of the town centre' are referred to in 5.7, but it is not clear whether this means the railway bridge near Latchford Locks or some otherwise undisclosed structure;
- Section 5.32 indicates that a 'further high level connection across the Ship Canal' may be required but it is unclear how this relates to the previous comment.

It will be clear from the comments already made on the issue of congestion that WBC has not established a clear plan for relief of congestion in the area within the PDO or within the town as a whole. It follows that the cost of congestion relief must therefore also be unknown, as must be the plan for raising the necessary funds.

#### 4.2 Motorway junctions

The proposals have significant implications for the motorway access points at J20 of the M6 and J10 of the M56. The upgrading of both motorway junctions is indicated in Fig 10, but not Fig 7 and is not discussed in the text.

There is no evidence that the Highways Agency has reviewed and approved the proposals.

#### 4.3 Village Design Statement

It is argued in the PDO (Section 4.48) that the character of Culcheth and Lymm is a reason for avoiding development in those locations, but both Grappenhall and Thelwall also have a distinctive character, recognised in the Conservation Area status

of both villages. No matter what the Arup report may say, public opinion values the character of Grappenhall and Thelwall and the surrounding countryside. This character is recognised and described in detail in the Village Design Statement (VDS) for the Parish of Grappenhall and Thelwall (2003). The proposed development would seriously alter and detract from the character of these villages and their rural surroundings. Nowhere in the PDO has consideration been given to the content of the VDS, nor is it referenced in the Arup Report. This is a very serious omission which calls into question the validity and legitimacy of the PDO.

## **5. Conclusion**

I therefore object strongly to the proposals set out in the PDO for a Garden City Suburb in Grappenhall and Thelwall because:

- the housing numbers used to identify housing need are not properly supported and form a very weak base on which to propose the irreversible release of land from Green Belt;
- the 'exceptional circumstances' required to be demonstrated to justify release of Green Belt have not been demonstrated;
- the proposals are founded on the strategic objective of Warrington New City and no evidence is presented that the New City is either necessary or supported by the public;
- the process of identifying the High Level Spatial Options takes no account of Warrington's particular transport difficulties caused by the Manchester Ship Canal and the River Mersey and relies too heavily on the Green Belt Assessment of 2016 (Arup Report) which has been criticised by [REDACTED];
- the process of identifying main development locations likewise ignores the above difficulties;
- the identification of Grappenhall and Thelwall as the proposed site of the Garden City Suburb is thus based on false reasoning with too narrow a scope;
- the PDO contains no proposals to provide new infrastructure to support Warrington's growth, reduce congestion and promote sustainable transport options. As such it fails completely to meet Strategic Objective W4 and the declared objective of the PDO itself (Section 5.3);
- the new strategic road is vague in its destination, feasibility, likely effect on congestion in the town as a whole, and cost;
- impacts of the development on motorways and flood risk are undefined;
- it damages the TPT.

It therefore seems likely that if the PDO were implemented, large-scale development would take place with no improvement in general infrastructure. The resulting situation would be worse than it is at present and in that case the sacrifice of Green Belt would have been in vain.

I make this objection in my own right as a resident of Thelwall.



25 September, 2017