



WARRINGTON

Borough Council

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Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

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Which best describes you? (tick \checkmark one option only)

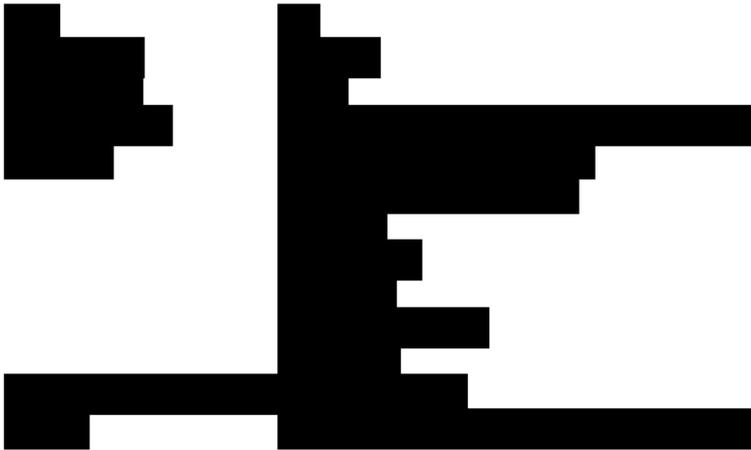
Resident in Warrington

Resident from outside of
Warrington

Business

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As you know, this is your response form from your website titled: Standard_Reply_Form.docx, to which is gibberish as far as editing goes. Therefore, I shall put my details as you are requesting as follows:



Introduction

██████████ being one of the Local People of Warrington Borough, herewith submit the Local People's comments on Warrington Borough Council (WBC) submission to change the Local Plan 2012-2027 adopted July 2014 published February 2015.

The main objection is that WBC has not followed the National Planning Policy Framework paragraph 1.

The Local People's objections regarding the WBC Local Plan Review 2017-2037 follows.

Plan-making

The National Planning Policy Framework March 2012 shows in paragraph 1 the legal entity of the Local People and their (the local people) accountable council (Warrington Borough Council, WBC) to produce their (the Local People) Local Plan for the benefit and need of their (the Local People) community. The relevant sections from the National Planning Policy Framework (NPPF), regarding Plan-making, as follows:

“

Ministerial Forward

This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.

In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities.

This National Planning Policy Framework changes that. By replacing over a thousand pages of national policy with around fifty, written simply and clearly, we are allowing people and communities back into planning.

*Rt Hon Greg Clark MP
Minister for Planning*

Introduction

1. The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied.¹ It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Core planning principles

17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- *be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;*

.....”

The NPPF clearly shows that the Local People are empowered to jointly work with their accountable council to produce a Local Plan and not to be told this is the local plan by the council prior to March 2012. That old planning regime has now gone.

Although the NPPF does not give criteria in what way the Local People influences and determinates the Local Plan, it is obvious that the local people have to give their bless to the council if this council needs extra money before the council can realise the Local Plan. This is a logic consequence of the NPPF.

The Local Plan adopted in 2014, and thus created under the NPPF, failed also to follow the NPPF process with joint working and co-operation with the Local People.

In fact the final Inspectors Report was not given to the Local People to study and approve to comply with the NPPF paragraph 1. Instead it was left in the hands of their accountable council, who (WBC only) were consequently taken to court by one of the developers. It must be noted that the Court summons was served to the accountable council, Warrington Borough Council and not to the Local People **and** their accountable council. So this put doubts on the validity of this courts' judgement, as it has not been served on the Local People of Warrington (see later Local Plan 2012-2027 Legal Challenge).

This is now the new face of planning, for if the adopted Local Plan once created with various future planning aspects are included, as accepted by the Local People as stated in the NPPF, then under the paragraphs 11, 12 and 13 of the NPPF:

“The presumption in favour of sustainable development

11. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.⁷

12. This National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.

13. The National Planning Policy Framework constitutes guidance⁸ for local

planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.”

7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

8 A list of the documents revoked and replaced by this Framework is at Annex 3. Section 19(2)(a) of the Planning and Compulsory Purchase Act 2004 states, in relation to plan-making, that the local planning authority must have regard to national policies and advice contained in guidance issued by the Secretary of State.

Then subsequent applications that accord with the up-to-date Local Plan should be approved without the need of further approval from the Local People. For once the Local Plan has been approved by the Local People the decision-taking is then under the proper planning authority (local Planning Authority or the Planning Inspectorate with ministerial decision).

The Warrington Local Plan Review has disregarded the fundamental controlling first paragraph of the NPPF. The involvement of the Local People has been placed as a secondary role by **their** accountable council Warrington Borough Council. For the words of the NPPF paragraph 1 states, “*Local people and their accountable councils can produce their own distinctive local and neighbourhood plans*”, where the word “**and**” indicates equal/together/work jointly; together with the use in the sentence of “**their**” which refers solely to the Local People not to the accountable council, which means it is the local people who together with their accountable council produce a plan the local people approve.

The reference to Local People runs through the NPPF in the way, especially as a core planning principle as shown above.

Warrington Borough Council Local Plan Review 2012-2027

The Local People’s comments on their accountable council, (WBC), proposal to review the recently approved and adopted Local Plan only by WBC, from the Inspector’s report on the examination of the WBC Core Strategy. The inspector’s report was not approved by the Local People prior to WBC adopting the Local Plan 2012-2027 in July 2014, published in February 2015.

In the adopted Local Plan 2012-2027 it is stated in Policy CS 3 and paragraph 19.2 that the local plan can be modified if the need requires or updated every 5 years:

“Policy CS 3

Overall Spatial Strategy - Maintaining a 10 Year Forward Supply of Housing Land.

Should monitoring indicate that an on-going, 5 years’ deliverable and a subsequent 5 years’ supply of developable housing land can no longer be sustained or where it can be demonstrated that housing need cannot be met within Warrington, the Council will review its housing land provision, and bring on-stream additional housing sites as required, with priority given to encouraging the reuse of previously developed land and avoiding sites in the Green Belt where possible.

19.2 The Local Plan Core strategy looks over a long term 15 year time frame. In the arena of the built and natural environment many issues may change over this time. Whilst the plan contains flexibility, it may not always be possible to have maximum certainty about the deliverability of the strategy. It may therefore be necessary to review the Local Plan Core Strategy before the end of the plan period. If monitoring of the strategy does not trigger such a review, a full review of the Local Plan Core Strategy will be undertaken every 5 years.”

This paragraph appears to have now been invoked by WBC only, without first having positive meetings or discussions with the Local People, to the reasons behind the trigger to a review of the local plan 2012-2027 within less than 2 years from adoption in July 2014 published February 2015, for a new local plan period from 2017-2037.

This shows that WBV is wasting time and money to create a local plan over a period of 20 years (2017 – 2037) when an update must be done in 5 years time. When this is not done, it would be logic to put in a time schedule for every five years.

Local Plan 2012-2027 Legal Challenge

It is note that a developer and not the Local People challenged the adopted Local Plan 2012-2027 and took only the accountable council WBC (and not the Local People and their accountable council) to High Court where various paragraphs were quashed from the adopted Local Plan 2012-2027. The developer being a company can not be classed as Local People, the consequence of as the developer failed to serve their court challenge against the correct body responsible for the local plan 2012-2027 (as per the NPPF paragraph 1), the application of the court judgement is as a only as piece of paper, due to not being served correctly and as a consequence the judgement can not be applied to the Local People and their accountable council WBC adopted Local Plan 2012-2027. This lays solely on the developer and not on the Local People or their accountable council WBC or court for not serving the challenge in the appropriate manner.

Call for Sites

The documents accompanying the Local Plan Review show there has been a “Call for Sites” with the adopted local plan 2012-2027 in place. This action caused only WBC not the Local People to invoke the Local Plan 2012-2027 paragraph 19.2 With only as it looks like days after the local plan 2012-2027 was adopted in July 2014. This call for sites was without the Local People's approval as its intention was for WBC to change the adopted Local Plan 2012-2027. To which has been shown to have been the case with the Local Plan Review consultation without first Local People approval. This call for site looks as if the Local Plan 2012-2027 was flawed from the outset. Also in all cases once there is an item produced or published, there is always someone who will always say “can it do this or that”, with the answer “no”, with the response “can it”, the reply “yes, but you should have told us at the start, now if you want these changes there will be an extra cost”. This the Local People are now seeing and facing the cost due to WBC for failing to assess the local plan 2012-2027 with reliable requirements and to inform the Local People at the onset to develop the core strategy for the local plan 2012-2027 in the first place. Policy CS 3 and paragraph 19.2 now appear as a “Get out of Jail Free” card to quote the board game 'Monopoly', for WBC to use with no apparent reason without the Local People being first informed as to Why, especially so soon after the Local Plan 2012-2027 was adopted.

Duty to Co-operate

With respect to the “Duty to Co-operate” (DTC), though a planning preserve between councils to discuss a way forward, as the DTC is referred to in paragraphs subservient to paragraph 1 of the NPPF, namely paragraphs 54 and 178 and finally checked in paragraph 182, all require the co-operation of the Local People to first approve the areas of co-operation for their accountable council to proceed with the DTC with the appropriate council.

The law on duty to co-operate is between the Local People's accountable council and the neighbouring councils, where the law shows only the councils can arrange the co-operation on areas next to the joint borders of each council's area. The NPPF shows that the duty to co-operate are paragraphs after paragraph 1, so the duty to co-operate, as stated in paragraph 17, has to follow paragraph 1.

So as it is the Local People who with and alongside their (the Local People) accountable council (WBC) to produce their (lthe Local People) Local Plan any aspect that is in the proposed local plan must be ratified first by the local people in conjunction with their accountable council. This includes the duty to co-operate on strategies development included in the proposed local plan that concerns consulting a neighbouring council, where the local people first understand and give their approval for their accountable council to enter into discussions with the neighbouring council concerned. Once the Local People approve then the accountable council can enter discussion with the council concerned and once agreed report back to the Local People who can agree or disagree with the

outcome of the duty to co-operate discussions. This WBC did not enter in to with the Local People prior to agreeing with the duty to co-operate with the concerned council(s). This makes the Duty to co-operate an invalid submission and is rejected from any local plan review by the Local People.

Warrington Borough Council Local Plan Review 2017-2037 Consultation Summer 2017

In the consultation without Local People approval first Warrington Borough Council presented on several presentation days for the local people to scrutinise their accountable council's local plan review. The presentation consisted of several maps or plans as to inform those local people what will happen to their area by WBC. Many people were annoyed as if being dictated to and accept what their accountable council WBC have solely decided to do and are proposing without prior notice between the Local People and their accountable council as directed by the National Planning Policy Framework (NPPF) as shown above.

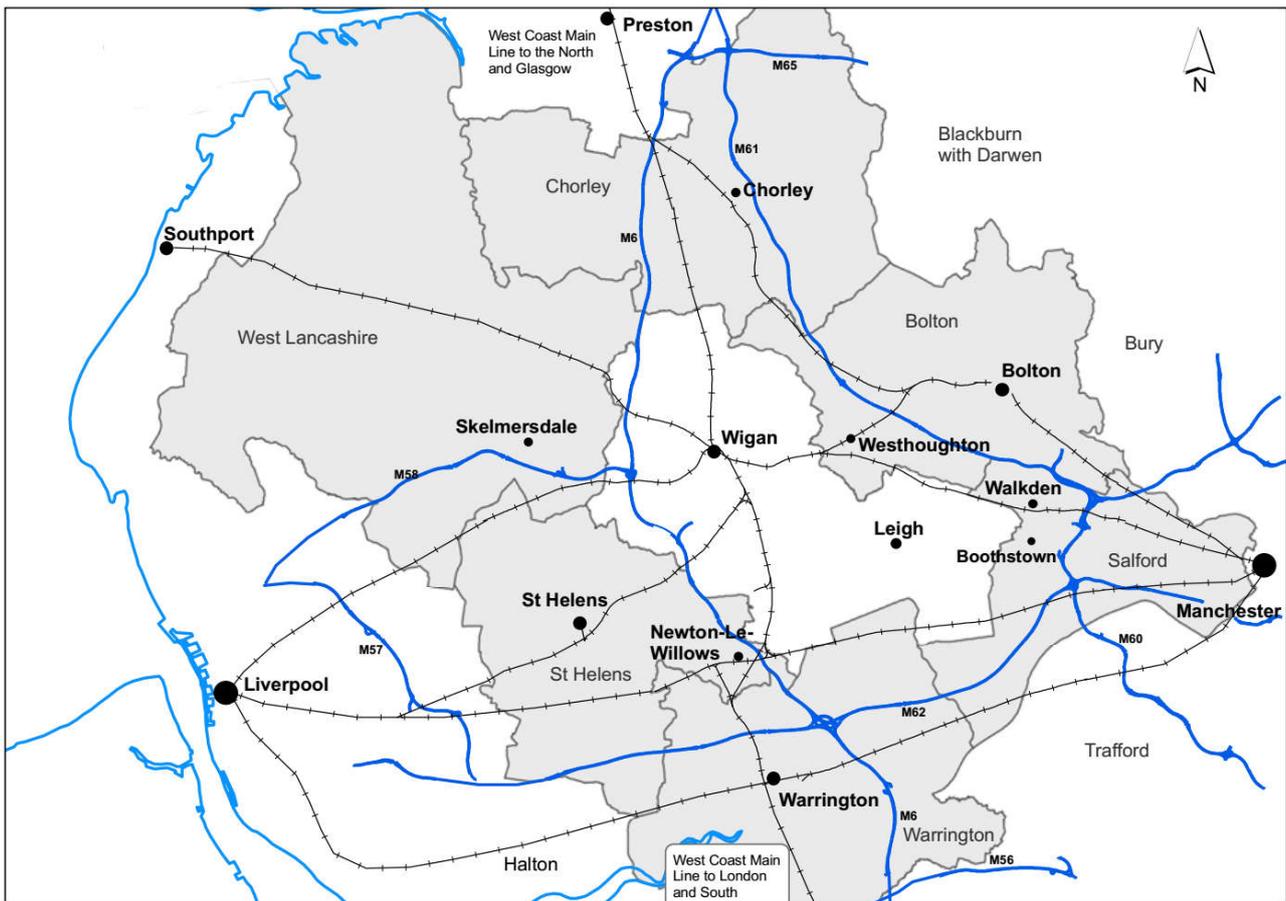
In the consultation meetings was not shown the co-operation with the Neighbouring Councils especially as the Preferred option shows to the south of Warrington called the Garden City with 6324 new homes through release of Green Belt; 950 new homes within the urban area; up to 5 new schools; new sports facility, Leisure Centre, Country Park, district centre and 3 local centres; along with a proposal for 116.8 Ha of Employment land. All next to the M56 J10 and M56J9/M6J20 interchange.

With St Helens Council Local Plan proposal of St Helens Omega north/south development adjacent to extend and link into Warrington Omega north/south in order to use the M62J8 for access to St Helens Omega development; and together with St Helens council as the owner/developer proposal to develop Parkside using the M6J22/A579 interchange (The A579 is: Winwick Lane to Lane Head, Lowton, Wigan; and the Winwick Link Road to the A49 at Winwick, Warrington), and along with the A49 south to the M62J9.

Both of these St Helens proposals will affect the M6J21a/M62J10 interchange. Together with the Warrington Omega as well as this is under construction to bring forth new employment units.

St Helens Council Local Plan also has numerous development proposals at the M6J23/A580 interchange and along the A580.

Then Wigan Council In their Local Plan has developments proposed at the M6J25, linking routes to the north to M6J26/M58 interchange to the south to M6J23/A580 interchange and M6J21a/M62J10.



This means the area along the M6 which passes through the Councils of Wigan, St Helens and Warrington, the developments proposed on top of the already employment infrastructure in place, will impact upon the Motorway networks from the M6J26/M58 interchange; M6J25; M6J23/A580 interchange; M6J22; M6J21a/M62J10 and M6J20/M56J9.

The M6 having a finite capacity not an infinite capacity for traffic numbers. Despite the Smart Running project for the M6, the motorway M6 will cease to cope, putting an impact on the local roads through Wigan, St Helens and Warrington. This means as the A49 effectively runs parallel with the M6 with links at virtually every junction, the A49 is the flood plain for the M6 when problems occur. Now with the 3 Local Councils Wigan, St Helens and Warrington proposing developments to flow extra traffic on to the M6 over the next associated Local Plan Periods for each council.

The next 10 to 15 years the M6 will be full to over capacity. So what will the A49 be like through each Council's area, apart from being or having the M6 car park and the A49 car park? Each Council in preparing their respective Local Plan have the duty to co-operate under the NPPF this includes looking at the M6 capacity with the neighbouring councils reliance on the M6. No where does the other councils employment development use of the M6 are applied. True the responsibility of the Primary Routes and Roads is Highways England under the Secretary of State for Transport, where ultimate responsibility lies for the M6 motorway. The respective council's Local Plans in development or when adopted only concern themselves with their section on the impact of the M6, with Highways England doing the same.

It is now the time for the Local People to insist that in this WBC Local Plan Review 2017-2037, to put forward that the councils Wigan, St Helens and Warrington together with Highways England to sit round the table, to discuss the whole motorway M6 impact that junction 20 through to junction 26 due to the proposed new developments proposed along that length of the M6 and associated

motorways and Local Roads that are affected (A49, A579 and A580). The meeting could be in the form of a Judicial Review.

Conclusion

The Local People put forward the Local Plan Review 2017-2037 to have a statement: A judicial Review to take place, where the three councils of Wigan, St Helens and Warrington (maybe other councils as well) to meet with Highways England and the Department for Transport to discuss the impact the proposed developments that have been included in their respective local plans will have on the Motorway networks in particular the M6 motorway, the A580 and the A49 and A579.

Quantity and Distribution of Development

Housing Implementation Strategy

6.4 The table below indicates the potential housing delivery over the remainder of the plan period:

Source of dwellings	Number of dwellings
SHLAA Deliverable/Developable Completions	
2012/13 – 2016/17	2,675
2017/18 - 2021/22	1,558
2022/23 - 2026/27	1,562
Sub-total	5,885
Additional sites	
Windfall (15x41)	615
Arpley Meadows 25% by 2027	675
Omega and Lingley Mere	1,100
Unlocking suitable but constrained sites	824
Sub-total	3,214
Total 2012-2027	9,099
Annual rate over 15 years	607 dpa

Table 1 Potential sources of housing land 2012-2027

6.5 Current evidence, primarily in the form of the Council's SHLAA and Annual Monitoring Report (AMR), identifies that supply from the above sources is more than sufficient to meet the borough's 5, 10 and 15 year requirements.

6.6 Based on the present evidence, a summary of which is appended (Appendix 2), a review of this element of the strategy and/or a further Local Plan would not need to commence unless ongoing monitoring indicates a 5 or 10 year forecast shortfall.

6.7 A review of the strategy with regards to managing housing land release would also be triggered if:

- Government Policy / Legislation changes;
- evidence used to determine the housing requirement changes;
- monitoring shows the strategy is not meeting its objectives; or
- market signals indicate a clear need for change.

6.8 The Council recognise the importance of regular engagement with housing enablers to keep abreast of, assess and better understand the likely implications for delivery, of changes in market and or economic conditions. The Council will therefore continue to engage with the Housing Market Partnership, across the plan period, as a means of bringing together and understanding information and intelligence to identify future opportunities and risks.

6.9 Policy CS3 indicates that the need to allocate further land for housing would be triggered if monitoring indicates a:

- continuing and increasing shortfall in the 10 year supply of developable sites, and a consequential threat to a 5 year continuous supply of deliverable sites; or
- diminishing residual capacity to meet requirements over the plan period.
- mismatch between the actual mix of dwelling types and tenures delivered compared to the dwelling type needs identified in the most up to date Strategic Housing Market Assessment.

6.10 If needed, a further Local Plan would be produced in accordance with the requirements of relevant Government Policy and Legislation and broadly follow the process below with consultation at each stage:

- Identification of Issues and Site Options
- Assessment of Options with regards to addressing the issues
- Selection of preferred Option and hence site(s)
- Submission of the Local Plan for examination in public by a Government appointed Inspector
- Adoption of the Local Plan by Full Council

Growing the Economy

6.11 Sources of employment land supply within the borough include:

- Sites under construction;
- Sites with extant approvals for development; and
- The Omega Site (including phases 3, 4 & 5) and Lingley Mere.

6.12 The table below shows the current employment land position from 2006 to 1st April 2012. Sites under construction and those with planning permission indicate that there is a need for approximately 71 hectares of employment land within the plan period to meet the identified requirement. This can be entirely met by the Omega Strategic Location which accounts for over 130 hectares in total.

Plan Period 2006-2027	21 Years Requirement
21 x 11 Ha. + 20% choice factor	277 Ha
Completions (2006-2012)	59.27 Ha
Under Construction at 1/4/12	3.98 Ha
Identified Sites at 1/4/12 (Sites with Planning Permission including Omega Phases 1 & 2)	142.01 Ha (13 years forward supply)
Total Available	205.26 Ha
TOTAL REQUIREMENT	277 Ha
Remaining Requirement to 2027	71.74 Ha
Omega Strategic Site	130.19 Ha
Total Available	335.45 Ha
Residual Post 2027	+58.45 Ha (5.3 years)

Table 2 Employment Land position at 1st April 2012

Policy CS 3

Overall Spatial Strategy - Maintaining a 10 Year Forward Supply of Housing Land.

Should monitoring indicate that an on-going, 5 years' deliverable and a subsequent 5 years' supply of developable housing land can no longer be sustained or where it can be demonstrated that housing need cannot be met within Warrington, the Council will review its housing land provision, and bring on-stream additional housing sites as required, with priority given to encouraging the reuse of previously developed land and avoiding sites in the Green Belt where possible.

19.2 The Local Plan Core strategy looks over a long term 15 year time frame. In the arena of the built and natural environment many issues may change over this time. Whilst the plan contains flexibility, it may not always be possible to have maximum certainty about the deliverability of the strategy. It may therefore be necessary to review the Local Plan Core Strategy before the end of the plan period. If monitoring of the strategy does not trigger such a review, a full review of the Local Plan Core Strategy will be undertaken every 5 years.

Policy	Target(s)	Indicator	Which SA objective this policy meets
CS1	<ul style="list-style-type: none"> Sustainable Development over the plan period as defined by the Local Plan Core Strategy 	<ul style="list-style-type: none"> Overall performance as measured against the indicators set out for the rest of the plan. 	All
CS2	<ul style="list-style-type: none"> Delivery of a minimum 10,500 (net) new homes between 2006 and 2027. Delivery of a minimum of 277 Ha of employment land between 2006 and 2027. Delivery of 6,300 new homes within Inner Warrington by 2027, or 60% of all housing completions within this period. Delivery of 8,400 new homes on PDL by 2027, or 80% of all housing completions within this period. 	<ul style="list-style-type: none"> Housing completions analysis Housing land supply assessments (rolling 5,10 and 15 year) Employment land take up monitoring. 	1, 3, 4, 5, 6, 9, 10, 16, 19
CS3	<ul style="list-style-type: none"> Contingency Policy. 	<ul style="list-style-type: none"> Housing land supply assessments (rolling 5,10 and 15 year) 	6, 16

Local Plan 2012 – 2027 Appendix 2

Appendix 2 Summary of Housing Land Availability Position (1st April 2012)

The plan targets the delivery of a minimum 10,500 net new homes between 2006 and 2027, which equates to an annualised average of 500 per annum.

As at the 1st April 2012 however, 5,075 of these homes have already been delivered. This leaves a residual minimum target of some 5,425 new homes to be planned for between 2012 and 2027 (i.e. $10,500 - 5,075 = 5,425$), which equates to an annualised average of 362 dwellings per annum across the remaining 15 years of the plan period. Information contained in the main body of the Plan identifies however that potential housing delivery over the remainder of the plan period could, based on the available evidence, equate to an average of 607 net new dwellings per annum.

The most up to date information on all aspects of housing completions and the available land supply is set out in Warrington's Strategic Housing Land Availability Assessment (SHLAA). This assessment is updated annually in concert with the Mid Mersey authorities of Halton and St. Helens, and in partnership with the development industry and other interested stakeholders.

The 2012 SHLAA supports that the borough is able to demonstrate a five, ten and fifteen year supply of deliverable and developable land for housing, with the requisite assessments reproduced below.

a	Local Plan Core Strategy annual average housing requirement	500
b	Housing requirement 2006 – 2012 [a x 6]	3,000
c	Net actual completions 2006 – 2012	5,075
d	Surplus to carry forward into five year land supply assessment [c – b]	2,075
e	Rolling five year requirement 2012 – 2017 [a x 5]	2,500
f	Rolling five year requirement 2012 – 2017 inclusive of 5% buffer [e + (e * 0.05)]	2,625
g	Quantified net deliverable supply 'Years 0 – 5' [excluding capacity from constrained sites and windfall developments]	2,765
h	Grand total net supply (g+d)	4,840
i	Grand total net supply in years [h / a]	9.7
j	Five year requirement residual balance (supply) [h – f]	+2,215

Table A1 - Five Year Housing Land Supply Assessment (2012-2017)

a	Local Plan Core Strategy annual average housing requirement	500
b	Housing requirement 2006 – 2012 [a x 6]	3,000
c	Net actual completions 2006 – 2012	5,075
d	Surplus to carry forward into ten year land supply assessment [c – b]	2,075
e	Rolling ten year requirement 2012 – 2022 [a x 10]	5,000
f	Quantified net deliverable supply 'Years 0 – 5' [excluding capacity from constrained sites and windfall developments]	2,765
g	Quantified net developable supply 'Years 6 – 10' [excluding capacity from constrained sites and windfall developments]	1,558
h	Grand total net supply (g+f+d)	6,398
i	Grand total net supply in years [h / a]	12.8
j	Ten year requirement residual balance (supply) [h – e]	+1,398

Table A2 - Ten Year Housing Land Supply Assessment (2012-2022)

Since 2006, 53% of new homes delivered up until the 31st March 2012 (some 2,784) have been completed within the area defined as Inner Warrington. Evidence supports that 54% of the forward land supply will also occur within this area with the remainder anticipated to be distributed across the Borough as set out in Table A4 which also identifies the anticipated phasing.

a	Local Plan Core Strategy annual average housing requirement	500
b	Housing requirement 2006 – 2012 [a x 6]	3,000
c	Net actual completions 2006 - 2012	5,075
d	Surplus to carry forward into fifteen year land supply assessment [c – b]	2,075
e	Rolling fifteen year requirement 2012 – 2027 [a x 15]	7,500
f	Quantified net deliverable supply 'Years 0 – 5' [excluding capacity from constrained sites and windfall developments]	2,765
g	Quantified net developable supply 'Years 6 – 10' [excluding capacity from constrained sites and windfall developments]	1,558
h	Quantified net developable supply 'Years 11 – 15' [excluding capacity from constrained sites and windfall developments]	1,562
i	Grand total net supply (h+g+f+d)	7,960
j	Grand total net supply in years [i / a]	15.9
k	Fifteen year requirement balance (supply) [i – e]	+ 460

Table A3 - Fifteen Year Housing Land Supply Assessment (2012-2027)

[Table A4 below is wrong: Column 1 (in highlight) should be 2012 – 2017 not 2012 – 2027 as shown to follow the table for the totals for 2012 – 2027 in column 4 to be correctly understood.]

Place Making Area (alphabetical Order)	2012 - 2027		2017 - 2022		2022 - 2027		2012 - 2027	
	Units	%	Units	%	Units	%	Units	%
Countryside	59	2	5	1	0	0	64	1
Countryside Constituent Settlements	117	4	92	6	139	9	348	6
East Warrington	197	7	223	14	105	7	525	9
Inner Warrington (inclusive of Town Centre)	1197	43	780	50	1190	76	3167	54
North Warrington	134	5	69	4	11	1	214	4
Stockton Heath and South Warrington	84	3	32	2	16	1	132	2
West Warrington	977	36	357	23	101	6	1435	24
Total number of new homes	2765	100	1558	100	1562	100	5885	100

Table A4 - Spatial distribution and phasing of forward land supply (2012-2027)

Table A4 takes no account of the supply currently anticipated from unlocking and realising suitable but constrained sites (824 units), the supply from windfall developments (615 units) expected to emerge across the plan period, or any allowance for the supply from the Waterfront Strategic Proposal, all of which would significantly act to boost delivery within Inner Warrington, and in doing so compensate for the increase in West Warrington associated with delivery of the Omega Strategic Proposal which is not accounted for in the analysis within Table A4.

Analysis using information from the SHLAA has identified that the forward supply of housing land anticipated to come forward within the plan period is predominately made up of previously developed land and that greenfield opportunities are limited. This coupled with strategic overarching policies which seek to direct the majority of new development towards Inner Warrington should therefore collectively ensure that as a minimum 80% of new homes are delivered on previously developed land.

The Borough's previously developed housing land supply trajectory, as at 1st April 2012, is set out below. The trajectory identifies that at the end of the plan period 94% of the anticipated homes to be delivered over the plan period will have been delivered on previously developed land. However, again no allowance was made within the 2012 SHLAA and hence the trajectory for the supply currently anticipated from unlocking and realising suitable but constrained sites (824 units), the supply from windfall developments (615 units) expected to emerge across the plan period, or any allowance for the approximate 1,100 homes now proposed at Omega Strategic Proposal or supply from the Waterfront Strategic Proposal, the majority of which entail the redevelopment of previously developed land. Consequently performance across the plan period is likely to be more consistent than illustrated by the trajectory, with eventual overall performance is in excess of that currently predicated.

From the above adopted Local Plan 2012 – 2017 July 2014, the housing requirements for this period as shown in Appendix 2:

“The plan targets the delivery of a minimum 10,500 net new homes between 2006 and 2027, which equates to an annualised average of 500 per annum.”

Then goes on to state,

“Information contained in the main body of the Plan identifies however that potential housing delivery over the remainder of the plan period could, based on the available evidence, equate to an average of 607 net new dwellings per annum.”

So the adopted Local Plan 2012 – 2017 utilises a 22% assessment increase over the plan period of 15 years from 500 new houses to 607 new houses per annum or 9099 new houses over the 20 year period

These figures can be tested against the Warrington Borough Council Population growth figures available on the website:

Population Estimate Trends: Mid 2001 to Mid 2015



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Total population = 0 to 90+

From To

Select age groups:

Estimates	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Warrington Borough															
Male	94,000	94,300	94,600	94,700	95,200	96,000	97,100	98,100	99,100	99,800	100,500	101,000	101,700	102,400	103,100
Female	97,200	97,300	97,400	97,100	97,800	98,800	99,400	100,100	100,900	101,500	102,200	102,600	103,400	104,000	104,600
Persons	191,200	191,600	192,000	191,800	193,000	194,800	196,500	198,200	200,100	201,300	202,700	203,700	205,100	206,400	207,700
North West															
Male	3,288,500	3,289,100	3,318,700	3,338,300	3,354,500	3,373,200	3,390,400	3,409,200	3,426,300	3,446,600	3,467,700	3,483,700	3,495,000	3,511,300	3,524,400
Female	3,484,500	3,485,800	3,490,000	3,502,100	3,515,500	3,528,400	3,538,900	3,559,800	3,569,200	3,579,400	3,588,200	3,600,800	3,608,200	3,621,600	3,639,400
Persons	6,773,000	6,774,900	6,814,700	6,840,400	6,870,000	6,901,600	6,929,300	6,969,000	6,995,500	7,019,900	7,056,000	7,084,300	7,103,300	7,133,000	7,173,800
UK															
Male	28,832,300	28,972,700	29,125,300	29,287,000	29,541,000	29,761,600	30,027,900	30,300,600	30,532,200	30,805,500	31,087,300	31,315,200	31,533,000	31,793,800	32,074,400
Female	30,280,800	30,392,900	30,511,300	30,653,400	30,872,300	31,065,500	31,291,200	31,523,100	31,728,300	31,954,000	32,187,900	32,389,800	32,572,600	32,803,000	33,035,600
Persons	59,113,000	59,365,700	59,636,700	59,950,400	60,413,300	60,827,100	61,319,100	61,823,800	62,260,500	62,759,500	63,285,100	63,705,000	64,105,700	64,596,800	65,110,000

Estimates	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Warrington Borough															
Male	93,988	94,348	94,636	94,702	95,193	96,010	97,136	98,103	99,149	99,804	100,504	101,007	101,722	102,406	103,097
Female	97,284	97,267	97,361	97,135	97,798	98,593	99,423	100,084	100,908	101,505	102,205	102,645	103,387	104,022	104,588
Persons	191,202	191,615	191,997	191,837	192,992	194,603	196,559	198,187	200,057	201,309	202,709	203,652	205,089	206,428	207,685
North West															
Male	3,288,454	3,299,082	3,318,656	3,338,316	3,354,494	3,373,151	3,390,402	3,409,209	3,426,293	3,446,551	3,467,727	3,483,725	3,495,014	3,511,342	3,524,396
Female	3,484,531	3,485,796	3,490,004	3,502,053	3,515,527	3,528,434	3,538,875	3,559,338	3,569,863	3,579,370	3,588,234	3,600,612	3,608,247	3,621,648	3,639,438
Persons	6,772,985	6,784,880	6,814,660	6,840,369	6,870,021	6,901,585	6,929,277	6,968,547	6,996,156	7,019,921	7,055,961	7,084,337	7,103,261	7,132,991	7,173,835
UK															
Male	28,832,264	28,972,747	29,125,318	29,296,969	29,540,981	29,761,579	30,027,882	30,300,623	30,532,212	30,805,463	31,087,259	31,315,222	31,533,021	31,793,752	32,074,445
Female	30,280,752	30,392,930	30,511,344	30,653,365	30,872,295	31,065,488	31,291,193	31,523,149	31,728,274	31,953,983	32,187,888	32,389,808	32,572,833	32,803,000	33,035,868
Persons	59,113,016	59,365,677	59,636,662	59,950,334	60,413,276	60,827,067	61,319,075	61,823,772	62,260,486	62,759,456	63,285,145	63,705,030	64,105,854	64,596,752	65,110,034

% Change since 2001		2001 to 2015		2005 to 2015		2010 to 2015	
Warrington Borough							
Male	9.7	7.6	8.3	3.3			
Female	7.8	7.0	3.0	3.2			
Persons	8.8	7.6					
North West							
Male	7.5	5.4	2.5	2.5			
Female	4.4	3.5	1.8	1.8			
Persons	5.9	4.4	2.2	2.2			
UK							
Male	11.2	8.6	4.1	4.1			
Female	9.1	7.0	3.4	3.4			
Persons	10.1	7.8	3.7	3.7			

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Population Projections: Mid 2014 to Mid 2039

Total population = 0 to 90+

Select age groups: From To

	Estimates		Projections																											
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039				
Rounded to nearest hundred																														
Warrington Borough	102,400	103,100	103,800	104,500	105,200	105,900	106,600	107,300	107,900	108,600	109,200	109,800	110,400	110,900	111,500	112,000	112,500	113,000	113,400	113,900	114,400	114,800	115,300	115,700	116,100	116,500	116,900			
Male	51,200	51,550	51,900	52,250	52,600	52,950	53,300	53,650	54,000	54,350	54,700	55,050	55,400	55,750	56,100	56,450	56,800	57,150	57,500	57,850	58,200	58,550	58,900	59,250	59,600	59,950	60,300			
Female	51,200	51,550	51,900	52,250	52,600	52,950	53,300	53,650	54,000	54,350	54,700	55,050	55,400	55,750	56,100	56,450	56,800	57,150	57,500	57,850	58,200	58,550	58,900	59,250	59,600	59,950	60,300			
Persons	206,400	207,800	209,100	210,500	211,800	213,200	214,600	216,000	217,300	218,600	219,800	221,000	222,100	223,200	224,300	225,300	226,300	227,200	228,100	229,000	229,900	230,800	231,600	232,400	233,200	234,000	234,800			

	Estimates		Projections																											
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039				
Rounded to nearest unit																														
Warrington Borough	102,400	103,094	103,783	104,482	105,189	105,890	106,580	107,252	107,925	108,577	109,200	109,808	110,386	110,949	111,481	111,965	112,502	112,972	113,449	113,918	114,377	114,825	115,263	115,689	116,110	116,527	116,940			
Male	51,200	51,525	51,850	52,175	52,500	52,825	53,150	53,475	53,800	54,125	54,450	54,775	55,100	55,425	55,750	56,075	56,400	56,725	57,050	57,375	57,700	58,025	58,350	58,675	59,000	59,325	59,650			
Female	51,200	51,569	51,933	52,307	52,689	53,065	53,435	53,807	54,175	54,540	54,905	55,270	55,635	56,000	56,365	56,730	57,095	57,460	57,825	58,190	58,555	58,920	59,285	59,650	60,015	60,380	60,745			
Persons	206,428	207,752	209,116	210,478	211,841	213,231	214,615	215,954	217,291	218,573	219,817	221,015	222,147	223,237	224,283	225,295	226,251	227,162	228,079	228,992	229,896	230,752	231,595	232,414	233,219	234,016	234,813			

	% Change since 2014	
	2014 to 2015	2014 to 2039
Warrington Borough	3.4	13.6
Male	3.2	12.9
Female	3.3	13.4

From the population figures above WBC since 2006 have built 5075 new houses to 2012 out of the 10,500 new houses requirement stated in the adopted Local Plan 2012 – 2027, leaving 5425 new houses required for the period 2012 - 2027

Warrington Population to the nearest hundred
From 2001 to 2015 Actual figures

Year	Total Population	Increased Population from previous Year	Local Plan 2006 – 2012 Period of population (Actual) Accumulated	Local Plan 2006 – 2012 Period of New Houses built (actual) Total	number of population increase per new house built (actual) Ratio	Future new houses for population increase using ratio per year	Local plan 2012 – 2017 assessment increase of 607 new homes per year
2001	191200						
2002	191600	400					
2003	192000	400					
2004	191800	-200					
2005	193000	1200					
2006	194600	1600	1600				
2007	196600	2000	3600				
2008	198200	1600	5200				
2009	200100	1900	7100				
2010	201300	1200	8300				
2011	202700	1400	9700				
2012	203700	1000	10700	5075	2.11		
2013	205100	1400			2.11	664	607
2014	206400	1300			2.11	617	607
2015	207700	1300			2.11	617	607

Warrington Population to the nearest hundred
From 2016 to 2039 estimate figures

Year	Total Population	Increased Population from previous Year	20 year population growth from 2017 to 2037	Local plan 2012 – 2017 assessment increase of new homes/yr using 2.11	Local plan 2012 – 2017 assessment increase of 607 new homes/yr what ratio?
2014	206400				
2015	207800	1400			
2016	209100	1300			
2017	210500	1400	1400	663.5	2.31
2018	211800	1300	2700	616.1	2.14
2019	213200	1400	4100	663.5	2.31
2020	214600	1400	5500	663.5	2.31
2021	216000	1400	6900	663.5	2.31
2022	217300	1300	8200	616.1	2.14
2023	218600	1300	9500	616.1	2.14
2024	219800	1200	10700	568.7	1.98
2025	221000	1200	11900	568.7	1.98
2026	222100	1100	13000	521.3	1.81
2027	223200	1100	14100	521.3	1.81
2028	224300	1100	15200		Average = 2.11

So from the adopted Local Plan 2012 – 2027, the increase from 500 new houses per annum to assessment increase of 22% to 607 new homes per annum gives an occupancy of the population growth per new home or 2.11 for the plan period of 2012 to 2027. This ratio of 2.11 can be applied

as a 22% increase from 2027 to 2037 for Local Plan Review by Warrington Borough Council. As these figures are derived from actual figures and applied to national statistics the Local People can accept these figures to apply to their accountable council Warrington Borough Council.

From the Local Plan Review file: SHMA Warrington Addendum.pdf

1.8 The demographic model was then adjusted through commensurate changes to in (+1) and out (-1) migration (internal and international) until the level of population growth, when the economic activity rates applied, meets the change in resident workforce of 24,245.

1.9 This change to migration also takes into account the age structure of migrants and the likelihood that they are of a younger age group.

1.10 Once the revised age structure is settled it is translated into a household growth in the same way as the demographic model i.e. through household representative (headship) rates. That is the propensity of anyone of a given age and sex to be head of a household.

*1.11 The final step is to include a provision for vacancy within the stock. This multiple effectively takes household growth and translates it into dwellings. **This gives a revised housing need of 984 dwellings per annum.***

The document shows that the workforce increase (change) over the Local Plan Review period 2017 – 2037 (20years) to be 24245 persons and this number requires 984 new houses per annum. Total over 20 years = 19680 new houses.

This increase in the Local Plan Review 2017-2037 of 984 new houses per year compared to the Adopted Local Plan 2012-2027 of 500 new homes per year increase to 607 new homes per year being an increase of 22%. Shows from:

- 500 new homes to 984 new homes is an increase of 97%; and
- 607 new homes to 984 new homes is an increase of 62%.

If the predicted population growth is as stated as being 24245 persons over the plan period 2017-2037 estimated to occupy 984 new homes per year (total over 20 years = 20 x 984 = 19680). This indicates that 24245-19680=4565 new homes have 2 person occupation and where 19680-4565=15115 new homes have single person occupancy. This excludes birth death and marriage statistics.

Conclusion

The justification for this high increase is hard to believe there is this need even now. If these number of houses were built, would result in a migration of people already working in WBC area, who commute from another council's area. This would increase Warrington population and decrease the other council population. Obviously, the reverse is also true. To predict that these figures are correct the population actual and statistical predictions need to be checked.

Government announcement on Local Housing needs

On the 14 September 2017 the Secretary of State for Communities and Local Government to the House of Commons announce the White Paper on “ Local Housing Need”, and recorded in the Parliamentary Hansard Volume 628. The following Housing data was announced:

“That is why we have added a third stage of the assessment, which is to set a cap on the level of increase that local authorities should plan for. If a local authority has an adopted local plan that is less than five years old, the increase will be capped at 40% above the figure in the local plan. If the plan is not up to date, the cap will be 40% above either the level in the plan or the ONS projected household growth for the area, whichever is higher.

Those three steps will provide a starting point for an honest appraisal of how many homes an area needs, but it should not be mistaken for a hard and fast target. There will be places where constraints, such as areas of outstanding natural beauty or national parks, mean that there is not enough space to meet local need. Other areas may find that they have more than enough room, and they may be willing and able to take on unmet need from neighbouring authorities.

Such co-operation between authorities is something that I want to see a lot more of. To the frustration of town planners, local communities are much more fluid than local authority boundaries. People who live on one side of a line may well work on the other, communities at the edge of a county may share closer ties and more infrastructure with a community in the neighbouring county than they do with another town that is served by their own council, and so on.

From talking to the people who live in these kinds of communities, it is clear that they get frustrated by plans based on lines on a map, rather than on their day-to-day, real-life experience. Planning authorities are already under a duty to cooperate with their neighbours, but that duty is not being met consistently. Today, therefore, we are also publishing a statement of common ground, a new framework that will make cross-boundary co-operation more transparent and more straightforward. Under our proposals, planning authorities will have 12 months to set out exactly how they are working with their counterparts across their housing market area to meet local need and to make up any shortfalls.

The methodology that we are publishing today shows that the starting point for local plans across England should be 266,000 homes per year. Nationwide, this represents a 5% increase on the upper end of local authority estimates, showing that the local planning system is broadly on target. For almost half of the authorities for which we have data, the new assessment of need is within 20% either way of their original estimate. Nearly half—148—will actually see a fall in their assessments, which are going down by an average of 28%. In the other 156 areas, where the assessed need will increase, the average rise is 35%, but in most cases the increase will be more modest: 77 authorities see an increase of more than 20%.

We are not attempting to micromanage local development. This is not a return to Labour's ineffective and unpopular top-down regional strategies, which we abolished in 2010. It will be up to local authorities to apply these estimates in their own areas; we are not dictating targets from on high. All we are doing is setting out a clear, consistent process for assessing what may be needed in the years to come. How to meet the demand, whether it is possible to meet the demand, where to develop, where not to develop, what to develop, how to work with neighbouring authorities and so on remain decisions for local authorities and local communities."

The Local Housing needs now gives clear and precise guidelines what the 304 councils across England have to achieve. This is what the Local People can use as this benchmark to ensure their accountable council is following.

The announcement of the White Paper gives the 304 councils a target of 266000 new homes per year. Looking at the WBC assessments of housing needs is from the adopted local Plan 2012-2027 to be one of the 77 councils with an increase of more than 20% from the figures shown in the plan of 500 new homes per year having been reassessed to 607 new homes per year an increase of 22%.

The Secretary of State has explained:

*"If a local authority has **an adopted local plan that is less than five years old, the increase will be capped at 40% above the figure in the local plan.** If the plan is not up to date, the cap will be 40% above either the level in the plan or the ONS projected household growth for the area, whichever is higher."*

WBC adopted local plan is within the 5 year period so **the increase will be capped at 40% above the figure in the local plan.**

The WBC adopted Local Plan 2012-2027 is 500 new homes per year with the increase of 607 new homes per year. So 40% gives the figures:

- 500 new homes plus 40% of 500 = $500 + 200 = 700$ new homes per year. Giving a 20 year total of 14000 new houses required for plan period 2017-2037; and
- 607 new homes plus 40% of 607 = $607 + 243 = 850$ new homes per year. Giving a 20 year total of 17000 new houses required for plan period 2017-2037.
- From the population figures released by WBC from the year 2024 to 2039, the population growth is predicted to fall from 1200 to 800 per year. So the new housing requirement will also fall after 10 years of the plan period.
- So the next 5 years will see the above 40% increase of either 700 or 850 new houses to 2022; then the subsequent 5 year assessments will start to fall from these figures; the following successive 5 year periods the housing requirement will decline yet again and again to 800 new houses per year.
- Therefore, Local Housing need for WBC, according to the Secretary of State for Communities and Local Government announcement for the Local Plan Review 2017-2037 for the next 5 years is between the figures at least 700 new houses to a capping of 850 new houses per year. This means if the Plan Period 2017-2037 for the next 20 years at the 40% capped increase to accommodate the published WBC estimated population figures growth to the year 2037 being 24000 persons the housing requirement is either:
 - 20 years x 700 new homes per year = 14000. Therefore 24000 population growth over from 2017 to 2037 divided by 14000 equates to 1.7 persons per new house built; or
 - 20 years x 850 new homes per year = 17000. Therefore 24000 population growth over from 2017 to 2037 divided by 17000 equates to 1.4 persons per new house built.

The occupancy of the new homes to be built shows there is an over supply of new houses for the given population when considering human behaviour to become partners, as well as births.

The Population Growth actual figures and the actual number of houses built when the Adopted Local Plan 2012-2027 Core Strategy of 2006 to 2027 examined by the Planning Inspectorate is as follows:

Population Growth

From the WBC website the following population figures can be obtained

Warrington Population to the nearest hundred

From 2001 to 2015 Actual figures

Year	Total Population	Increased Population from previous Year	Local Plan 2006 – 2012 Period of population (Actual) Accumulated	Local Plan 2006 – 2012 Period of New Houses built (actual) Total	number of population Increase per new house built (actual) Ratio	Future new houses for population increase using ratio per year	Local plan 2012 – 2017 assessment increase of 607 new homes per year
2001	191200						
2002	191600	400					
2003	192000	400					
2004	191800	-200					
2005	193000	1200					
2006	194600	1600	1600				
2007	196600	2000	3600				
2008	198200	1600	5200				
2009	200100	1900	7100				
2010	201300	1200	8300				
2011	202700	1400	9700				
2012	203700	1000	10700	5075	2.11		
2013	205100	1400			2.11	664	607
2014	206400	1300			2.11	617	607
2015	207700	1300			2.11	617	607

This shows the actual occupancy per actual new house built of the actual population growth for the Warrington area 2006 to 2012. The population growth was 10700 and 5075 new houses were built this gives an occupancy of 2.11 persons per new house built over the 2006-2012 period.

So using the occupancy of 2.11 persons per new house for the Local Plan Review 2017-2037 of a population growth of 24000 is 24000 divided by 2.11 = 11374 new houses required over the plan period 2017-2037 or 569 new houses per year required.

This figure does not apply the Secretary of State White Paper announcement of 40%.

So the 11374 new houses if increased by 40% equates to 11374 plus 40% of 11374 equate:

$11374 + 4550 = 15924$ new houses over the plan period 2017-2037 or 796 new homes per year

This means there is a range of plan period new housing required that all depend upon the number of persons that occupy the new house requirement for the plan period 2017-2037:

Occupancy	Number of new houses per year	Number of New Houses over the Plan Period 2017 to 2037
1.4	850	17000
1.7	700	14000
2.11	569	11374
2.11	796 (including S of S 40%)	15924 (including S of S 40%)

Conclusion to New Housing requirement for Plan Period 2017-2037

To the Local People of the Borough of Warrington is clear that the figures at the Consultation and documentation, using the statistical figures for population growth from 2017 to 2037 being 24000 persons for this period.

Therefore having used the data from Warrington from actual figures of population growth and of actual figures for new houses built as a benchmark, together with the recent Secretary of States Local Housing Need White Paper announcement 14 September 2017. The following show:

- Where one figure in the consultation was if to believed being 24000 new homes required as ludicrous as this equates to total single occupancy for a population growth of 24000.
- The figures in the document SHMA_Warrington_Addendum.pdf having a 20 year new house requirement of 984 new houses per year for a population employment growth of 24245.

These are incredibly high occupancy figures per new house per population growth. Thus can be disregarded as impractical. These figures would require a continual Local Plan Review virtually every year. As a 20 year forecast would never reach its final twentieth year never mind the first 5 years of the plan period.

The Secretary of State in the Local People view brings reality and a sensible increase but due to the methods of calculating a future new housing need (assuming the 24000 population growth is accurate. Then the known occupancy of new houses actually built in relation to actual population growth is a good measure to put forward for the Local Plan 2017-2037 for 24000 population growth having 2.11 occupancy of new houses required. The 2.11 represents a two person occupancy as the major percentage together with a smaller percentage of single occupancy, as a starting point. Making a range between **11374 to 15924 new houses required over the plan period 2027-2037 or 569 to 796 new houses required per year.**

The Local Plan 2012-2027 estimated 10500 new houses over the plan period with no Green Belt release. Whereas the Local Plan Review requires through Green Belt release to justify a figure of 9000 new houses over the next 20 years.

11374 new houses required over the plan period 2027-2037

With 607 times 15 years = 9105 already allocated in the adopted Local Plan 2012-2027 and the lower estimate of 11374 calculated requires an extra 2269 new spaces that can be already allocated in non Green Belt areas within Warrington via

- Garden City 950 new homes within urban area
- Waterfront 4,032 new homes (within Wider Urban Area)
- City Centre 3526 new homes
- Wider Urban Area Existing supply of 4869 new homes
- Total 13377 new homes (non Green Belt)

15924 new houses required over the plan period 2027-2037

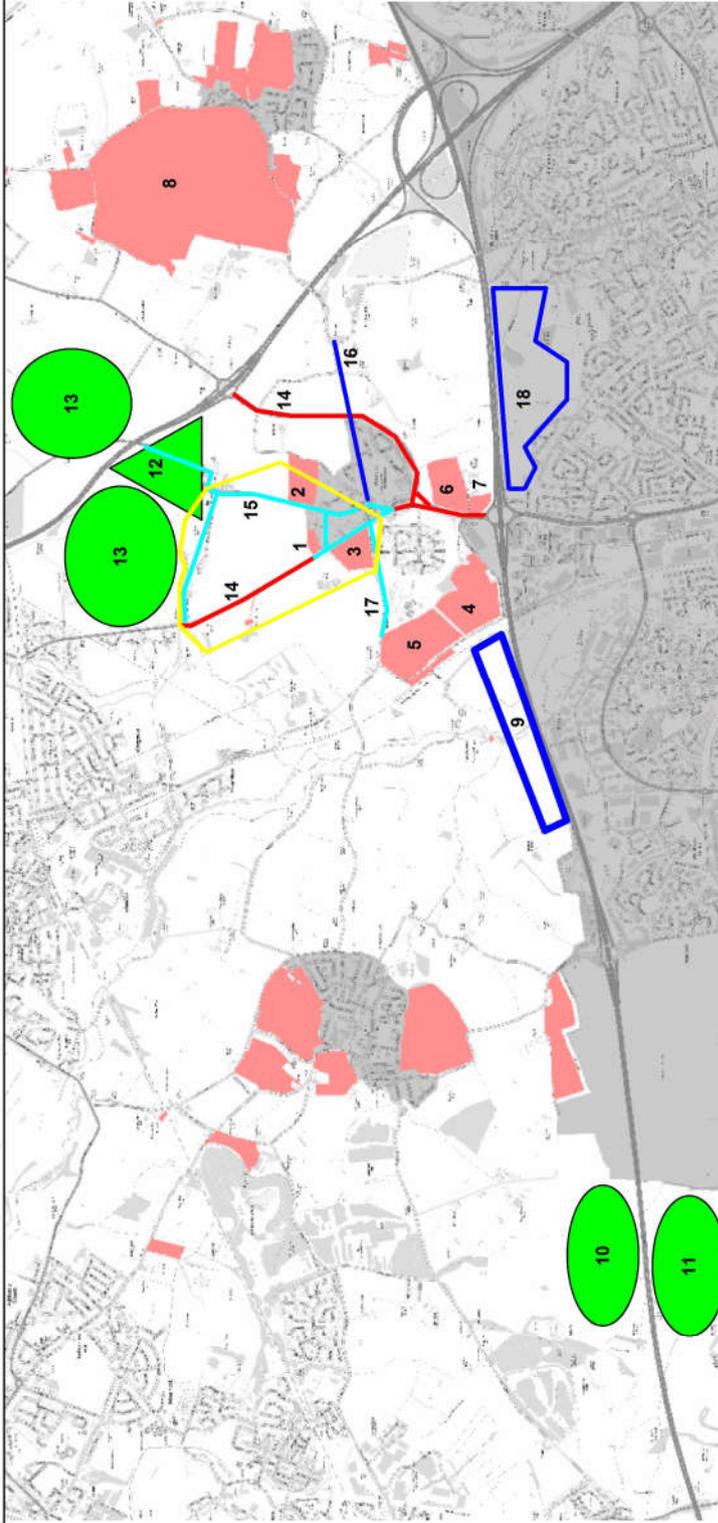
With already non green belt area shown totalling 13377 new homes, the 15924 new homes calculation leaves a shortfall of 15924 minus 13377 equals 2547 new homes required from Green Belt Release, not land to build 9000 new homes as shown in the consultation. If and only if a further review is required after 5 or 10 years due to unexpected economic activities requiring a further allocation in new housing. And it is clear that there is no Brownfield site available and the current population statistics are an under estimate or over estimate then the housing requirement can be assessed in the future due to Globalisation and the needs at that time in 5 years, 10 years and/or 15 years.

Overall conclusion on housing need for the plan period 2017-2037

The new housing figures for the accountable council WBC (only) Local Plan Review 2017-2037 by the Local People is assuming the population growth figures 2017-2037 approximates to 24000 persons then the new house is between **11374 to 15924 new houses required over the plan period 2027-2037 or 569 to 796 new houses required per year**, with only an assessment if the requirement drastically changes with a review as a minimum of 5 years. The release of green belt is only to be allocated once ALL the Brownfield sites have been allocated and then and only then Greenfield sites and if the housing requirements have not been met then the use of Green Belt as a last option during the WBC Local Plan period 2017 to 2037. No further extension of the period is allowed until 2035. Where the Local People have agreed a minimum of 5 years for a review this is a review of only the 2017 to and up to 2037 and not beyond. This is due to WBC in 2014 agreeing the Adopted Plan 2012 to 2027 then before this local plan had started WBC not the Local People decided upon a review. This from now on is totally unacceptable to change the period from 2012-2027 to 2017-2037. If it had been a review of the plan period 2012-2027 then that would have been acceptable and a genuine review, whereas changing the date to 2037 that can never be envisaged. But as a review of a minimum of 5 years is acceptable by the Local People, then the next review will be in the year 2022, strangely though it seems 5 years before the current adopted Local Plan period ends in 2027. So why a change to 2037, when the current Local Plan 2012-2027 has a review every 5 years?

The Area under the concern for the Local People in WBC Local Plan Review 2017-2037 is the Winwick Hume Croft and Burtonwood Area. These are shown on the following map:

Warrington Borough Council (WBC) Local Plan Review 2017-2037 Developments in the Croft/Winwick and Burtonwood Area



- Locations 1, 2 and 3 - These fields are skirmish areas in the English Civil War battle of Winwick Pass require an Archaeological Survey prior to any development, area bordered in yellow is the approx area where fighting took place. Local Plan to include in a Policy a paragraph "Any development in the yellow area first require an archaeological survey to record the battlefield area" Reported: Civil War finds from these fields no record at Finds Office, Museum of Liverpool
- Locations 4 and 5 - These fields have the High Pressure Gas Transmission Winwick-Shevington Pipeline. Contact National Grid for approval of any development
- Locations 6 and 7 - Any development will impact on the traffic A49/M62
- Location 8 - Development will require access to Winwick Lane - increase in Traffic at Lane Head and M6J22
- Location 9 - Addition to the Omega development site to ease the traffic on local roads area prime for a Rail Freight Terminal to serve Omega and traffic from M62/M6 Not shown in the Warrington Local Plan as an impact to the traffic problem on the A49 etc
- Locations 10 and 11 - St Helens Council Local Plan Proposal to use road network in Warrington Omega development to use M62 J8 for access not M62 J7.
- Location 12 - Area required by St Helens Council to accommodate the Parkside SRFI, without the SRFI is not feasible. Traffic problems at Hermitage Green Village and Winwick village due to SRFI traffic not manageable. Not in WBC Local Plan
- Location 13 - St Helens Council requires that Parkside SRFI need to impact on the A49 and A573 through Winwick to access the M62 and other road south. Not in the WBC Local Plan Traffic assessment
- Location 14 - The detruncked Winwick section of the A49, 1 April 1978 due to running parallel with the motorway M6 truck road, from Hermitage Green Lane to M62 J9 and Winwick Link Road. Change to 30mph congestion charge cameras for HGV only. (20mph A49/A573 junction to Old Schoolhouse Lane)
- Location 15 - A49/A573 junction to Parkside Road M6 Bridge, Green Lane, Hermitage Green Lane change to 20mph and congestion charge cameras for HGV only
- Location 16 - Myddleton Lane congestion charge cameras for HGV only
- Location 17 - Hollins Lane change to 20mph; congestion charge cameras for HGV only
- Locations 14 and 17 - Hollins Lane Junction to M62 reported £5M modification investment required only to accommodate St Helens Council as being the part owner as well as being the developer to enable access to their Parkside Warehouse development only (not SRFI) from the A49? Not in WBC Local Plan
- Location 18 - Area known as Peel Hall to be reclassified from Green Field to Green Belt and to merge with Radley Common as Common Land. To enable the whole area to be classified as a Country Park and Nature Reserve for the benefit the Local People for this and future generations

Housing

Green Belt Release

From the Map locations 1, 2 and 3 are located where the Green Belt separation between two urban areas has been from the onset of Green Belt allocation a narrow gap, this has prevented the two communities of Newton-le-Willows and Winwick from urban sprawl. But WBC have allocated these three locations to accommodate housing development on fields that have been farmed since before 1066. The land of which was granted a special tax status as shown in the Domesday Book. This allocation for Green Belt Release by WBC certainly narrows the Green Belt gap, to which is compounded by St Helens Council pursuance since 1993 to remove the Green Belt status at the former Parkside Colliery site on the grounds for the need of employment, a 24 year need for a Rail Freight Interchange that appears not to be required or even evident the need actually exists. With the advent that other areas have been brought forward and Parkside and St Helens Council appear to have missed the boat, as the Former Parkside colliery site is still undeveloped and still Green Belt. This gap at Parkside is also an area that stops the urban sprawl between Newton-le-Willows and Winwick, but that could all change if WBC goes in favour with St Helens Council being the developer, owner and Local Planning Authority to decide the multiple applications St Helens Council have decided to follow despite agreeing that the Planning Inspectorate would be the decision-maker. This means the Green Belt will narrow with Parkside and these three fields are released from Green Belt.

The release from Green Belt of land for housing has not been proven by WBC through the exceptional circumstances tests for inclusion in the Local Plan Review.

For and due to the NPPF paragraph 12, once these areas are included in an adopted Local Plan then these three housing areas accord with the local plan then the applications in the Winwick area must be approved. The Local Plan does not show the very special and or exceptional circumstances test in the Call for Sites and also the Preferred Development option handed out at the summer 2017 public consultation. Even to the point that three of these fields allocated for Green Belt release to the north of Winwick:

- Land at Hollins Lane/A49;
- Land at Old Schoolhouse Lane/A49; and
- Land at the west of Golborne Road next to the waterworks treatment plant,

The Call for Sites from Warrington Borough Council show in the Winwick Area that at least three fields are indicated for Green Belt release. There is no mention in the Local Plan Review that these fields are a part of the Battle of Winwick Pass 19 August 1648 as it is recorded that skirmishes occurred in and around Winwick Church:

Battle Fields

The fields are also a part of the area where on 19 August 1648 the Scots invaders in England fought against the Parliament force under Oliver Cromwell in the Battle of Winwick Pass where after 3 hours fierce fighting at the Pass the Scot ran towards Winwick and were defeated by Parliament cavalry in and around Winwick where after 2 to 3 hours of hand to hand skirmishes the Scots ran in to Winwick Church where 1500 to 2000 Scots were made prisoners in the Church and between 1000 and 1600 Scots killed.

These fields are (maybe) actions of conflict occurred in these fields if from correspondence/letters etc at the time show skirmishes may have occurred:

- Sandersons letter 20 Aug 1648 - I rode towards Winwick with troops from Twisleton and Lilburns regiments to stop the Scots retreat, at least 1500 were prisoners in Winwick Church, 1600 Scots killed at Winwick etc;
- Heath Chronicles - a spark in a blue bonnet acted as if commander but was killed and the

Scots ran into the church crying mercy mercy etc;

- Hodgson's memoirs - the Scots horse appeared on the moor but the Scots through down their arms and ran... 4000 made prisoners in the church where we set guard on them etc;
- Cromwell's letter 20 Aug 1648 1000 Scots killed, and 2000 prisoners.

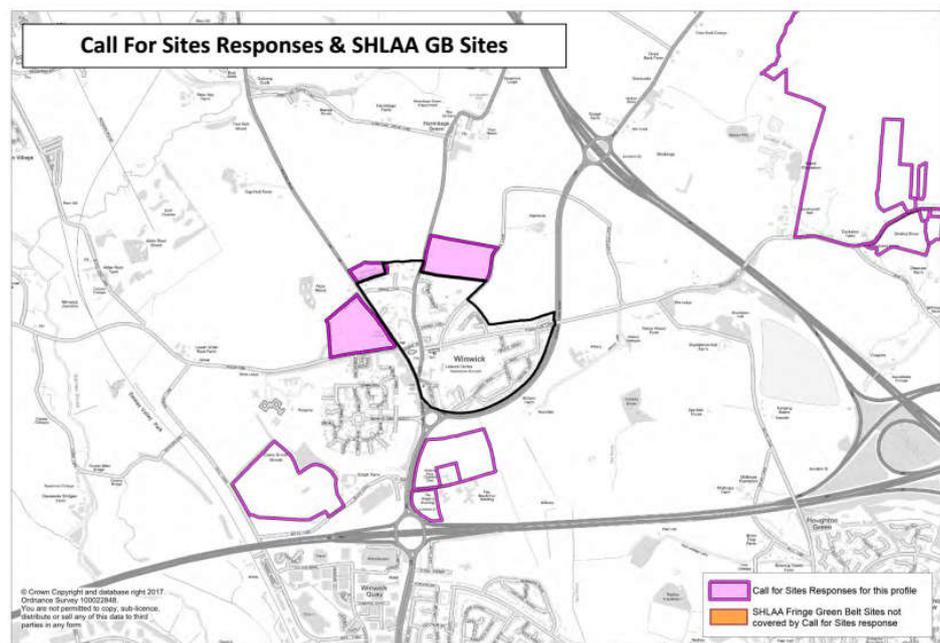
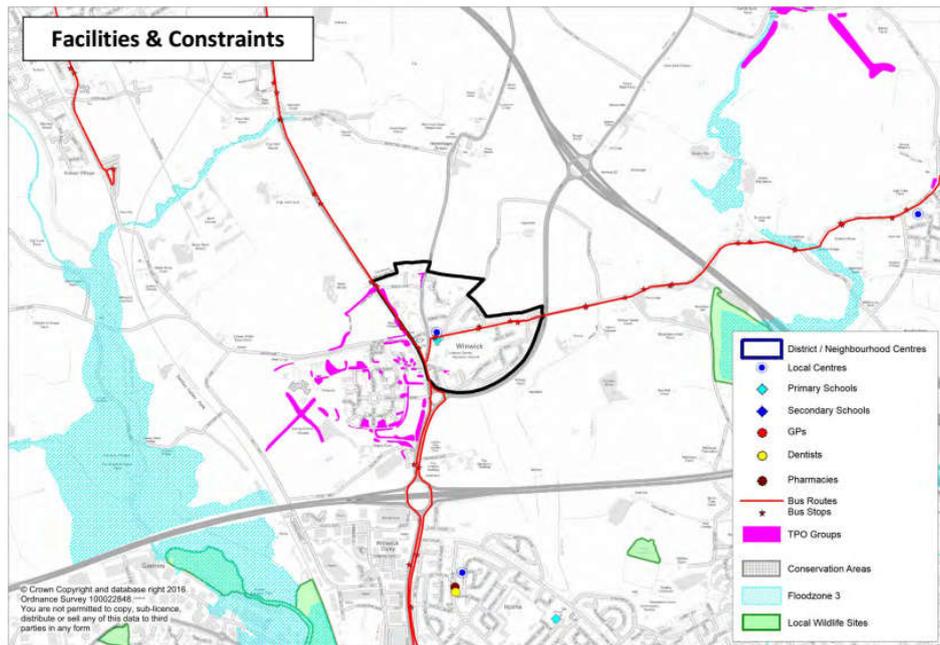
To this day it is not recorded where the Scots were buried. It could be these in these three fields that the some of Scots were/are buried, only an official archaeological survey can determine the importance of these fields. It is reported that metal detectorists have over the years removed musket balls and other historical finds.

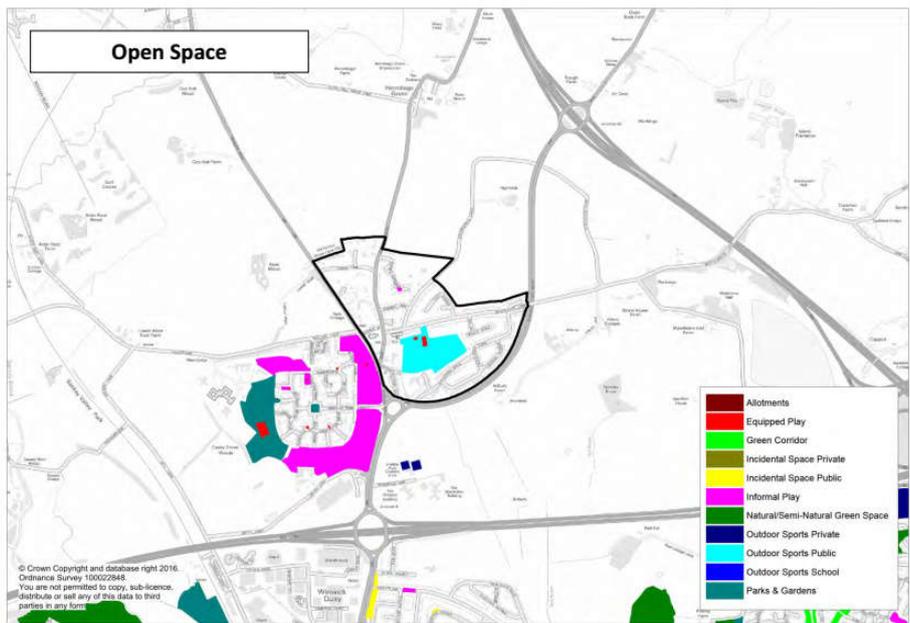
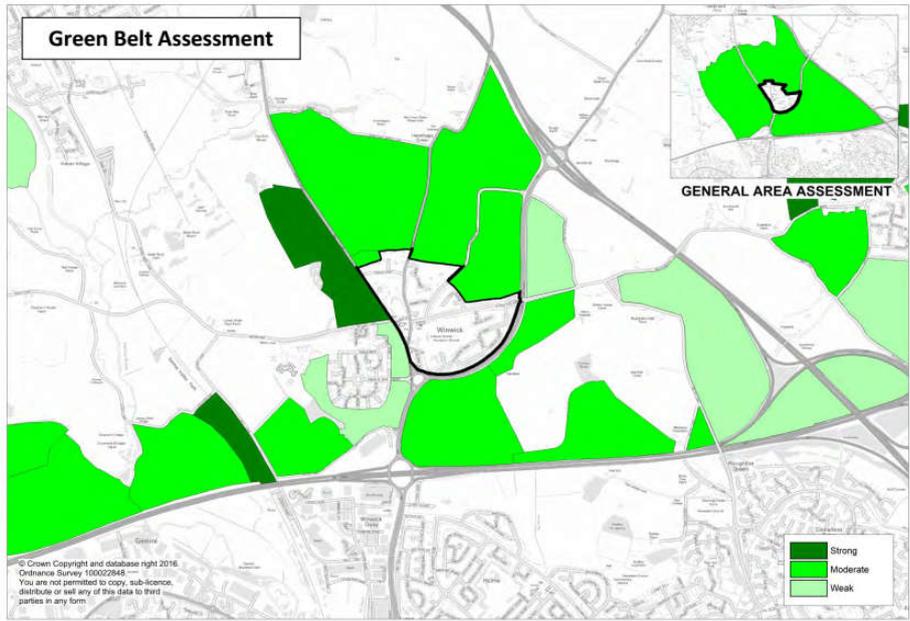
Note:

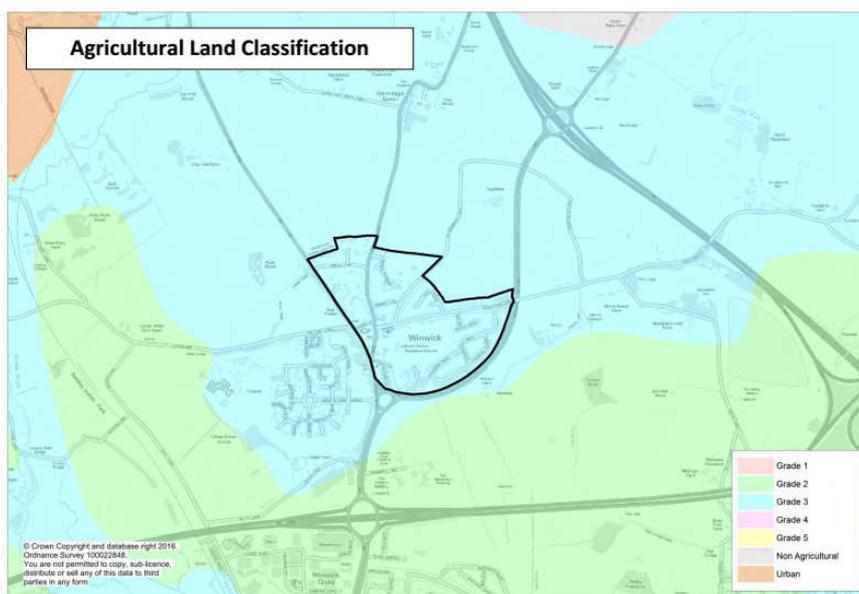
Warrington in 1643 is recorded as having a conflict between Parliament and Royalists during the First English Civil War 1642-1646. Where Winwick Church is recorded to have been used as a defence (bullet marks on the building). These fields could be also connected as having skirmishes at that time.

The fields that the Local Plan Review are proposing to release for housing are as follows:
From website document the Settlement_Profiles_Outlying_Settlements_July_2017_LR.pdf shows the Winwick area under consideration pages 49 of 54 as follows:

Winwick Settlement Profile







Population			
Residential Addresses (Jan 2017) –	866 (includes Winwick Park)		
Estimated Population (Jan 2017) –	866 x 2.35 x 96% = 1,954		
Demographic Information			
Age Profile (for Burtonwood & Winwick Ward - Estimated 2015)	17.2% aged under 16 / 59.9% aged 16-64 / 22.9% aged 65+		
Housing Tenure (for Burtonwood & Winwick Ward – Census 2011)	<p>Households (Census) source: Census 2011</p> <p>Households by tenure (%)</p> <ul style="list-style-type: none"> Households rented from council or equivalent (%) 5.0 Households rented from other private owners (%) 0.9 Households rented from other social landlords (%) 3.1 Households owned outright (%) 40.6 Households owned with a mortgage or loan (%) 42.5 Households rented from private landlord or letting agency (%) 6.5 Households where occupiers living rent free (%) 1.1 Households in shared ownership (%) 0.3 		
Employment Rate (for Burtonwood & Winwick Ward – Census 2011)	Employed Full /Part Time or Self Employed – 80.0% Unemployed – 5.8%		
Facilities			
Primary Schools	Size	Current capacity position	Expansion Potential
Winwick CE Primary School	1FE	Limited capacity	None-Site constrained
Forecast capacity- Winwick Primary School is expected to be able to accommodate future child yield and additional yields from limited new development within the existing urban area across the plan period.			
Secondary Schools	Size	Current capacity position	Expansion Potential
Culcheth High School	8FE	Limited capacity	None-Site constrained
Beamont Collegiate Academy	6FE	Limited capacity	Limited
Forecast capacity- Culcheth High School is forecast to have some limited capacity through child yield from existing population and known new development within the existing urban area by the early part of the plan period. However capacity may begin to emerge later on in the plan period. Beamont High School is forecast to be at or near capacity through child yield from existing population and known new development within the existing urban area by the early part of the plan period.			

GP Surgeries	Size	Current capacity position	Expansion Potential
None	N/A	N/A	N/A
Other Facilities			
Pharmacies	0		
Dentists	0		
Retail Centres	Winwick Local Centre – Small local centre with 4 A1 retail units (inc. one Convenience Store) which serves the local area well.		
Other Community Facilities *available for community use/hire	1 school*, 1 leisure centre		
Local Highways Network			
Some peak hour congestion in centre of village and in vicinity of A49. No planned local highways improvements in village.			
Strategic Highways Network			
Close proximity to both M6 (J22) and M62 (J9).			
Public Transport			
Winwick has the following main bus services No. 19 Service (Half Hourly) – Warrington to Leigh No. 22 Service (ARRIVA) (Hourly) – Warrington to Vulcan No. 329 Service (ARRIVA) hourly – St Helens and Warrington There is no direct access to a rail station. The nearest station is Newton-le-Willows for trains to Manchester and Liverpool.			
Active Travel			
Active Travel is clearly beneficial in terms of reducing the impact on the highway network as well as the obvious environmental, health and amenity benefits. More than twice as many people walk or cycle to work in Winwick (5.6%) than use the bus or rail, however, 76.6% travel to work in a car or van. Winwick has poor cycling and walking connections to Warrington, Culcheth and Birchwood which constrains further expansion of these modes. Any transport strategies developed to support planned development proposals must allow for this important mode and provide the appropriate facilities and schemes.			
Conservation			
Winwick contains no Conservation Areas. The urban area of Winwick contains 5 statutory listed buildings.			
Open Space, Sport and Recreation			
POS: Winwick has surpluses of most types of open space with the exception of natural/semi-natural green space. In the case of informal open space the surplus is substantial. There is no provision of natural/semi-natural green space at all. In terms of equipped play there are 5 LAPs, 1 LEAP and 1 NEAP. Sports Pitches: Winwick has a limited range of sports pitches that provide provision for local football teams. However, there are deficits of provision for some types of pitch (rugby league and football junior). Built facilities: Winwick has a community centre and a recreation ground. Whilst, there is no conventional leisure centre at Winwick (in terms of sports and swimming provision), residents can access a swimming pool/gym etc at the Orford Jubilee Neighbourhood Hub. However, in terms of swimming pool provision this is operating at full capacity.			
Green Belt Overview			
There are 3 General Areas bordering the settlement which are scored as Moderate. There are 10 individual parcels bordering the settlement of which 2 are Strong, 6 are Moderate and 2 are Weak. The strong parcels are located to the north west of the settlement.			
Landscape Character Overview			
Winwick is identified as falling within Type 1-Undulating Enclosed Farmland of the Warrington Landscape Character Assessment (2007) and is characterised through Area 1C of the assessment. Within Area 1C the agriculture predominantly consists of arable fields, intensely cropped, with poorly maintained remnant hedgerows with few hedgerow trees. Small deciduous woodlands form backdrops to views within the landscape and the area also contains three knolls to the north west corner.			
Housing Capacity			
	No. Of Sites	No. Of Units	
Estimated Capacity within SHLAA Urban Area	3	21	
Estimated Capacity within SHLAA Fringe GB Sites not in Call for Sites Responses	0	0	
Estimated Capacity from Call for Sites Responses (Fringe Areas)	3	310	

Growth Scenarios

(1) Incremental Growth

Overview	Up to 90 homes in addition to the 21 identified in the SHLAA.
Contribution to New City Concept	This scale of incremental growth would not significantly contribute to the Council's New City Aspiration.
Green Belt implications	Incremental growth could be achieved without impact on the strategic importance of the Green Belt. It is likely to require parcels making a weak and moderate contribution to the Green Belt to be developed. Incremental growth could be accommodated without releasing parcels making a strong contribution.
Supporting Role of Town Centre	Not applicable for this scale of development

Primary school implications	Winwick Primary School has limited capacity. Although there is no scope to physically extend the existing school, the child yield from 90 dwellings as incremental growth may be accommodated depending upon the local birth rate.
Secondary school implications	Secondary school provision for Winwick is most likely accessed at Culcheth High School or Beamont Collegiate Academy. Culcheth High School has limited capacity. This is forecast to be used up early in the plan period although capacity may begin to emerge later on in the plan period. There is not any potential for expansion due to site constraints and HSE exclusion zones. Beamont Collegiate Academy currently has limited capacity, but is predicted to be at or near capacity and the option to expand if required is limited. However, incremental growth of this scale is likely to be absorbed by the secondary schools without any significant impact.
Health facility implications	There are currently no GP Surgeries in Winwick but incremental growth of this scale could be absorbed by existing facilities in the main urban area of Warrington. Depending on growth elsewhere in this part of the borough, this may cumulatively result in capacity issues which could require an expansion of existing facilities.
Local Road Network	Incremental housing growth would cause a marginal increase in traffic levels and delays on existing links and junctions from the current levels. Further empirical investigation would be required to confirm the exact nature of the traffic growth impacts.
Strategic Road Network	Incremental growth could lead to a marginal increase in traffic levels and delays at M62 J9 and M6 J22. This would require further empirical assessment by Highways England to gauge the exact level of the impact on the SRN.
Public Transport	Incremental growth would only create a marginal increase in the potential market for the local bus services serving this area. It is unlikely that a gradual increase in bus travel demand under this scenario would be sufficient to support a new service. However a strategy to encourage modal shift from car to bus will be in place and could be supported with appropriate bus priority measures and bus passenger facilities.
Active Travel	The design and layout of any development should ensure that active travel opportunities are not compromised.
Open Space, Sport and Recreation	Incremental growth would place additional demands on existing open space provision but would not be of sufficient magnitude to require new provision over and above localised provision of open space and children's play areas. Incremental growth would also put pressure on existing sports pitches/facilities but would not be of sufficient magnitude to require new provision.
Character implications	Incremental growth would see Winwick increase in size by approximately 10%. There are a number of development opportunities which would not impact on the character of the settlement or the surrounding landscape.
Delivery issues	There are multiple realistic development site options to deliver incremental growth. The uplift in land value from potential development sites is considered sufficient to deliver the level of infrastructure required to support incremental growth.
Environmental considerations & prudent use of resources	No significant environmental constraints.
Any other issues	N/A
Comparison with Plan objectives & overall assessment	<p>Whilst incremental growth would not positively contribute to the Council's New City Aspiration, it could enable sustainable development within Winwick whilst respecting the overall Green Belt and settlement character objective.</p> <p>Reasonable development option. Additional growth in Winwick can be accommodated by local services and existing schools with the opportunity to provide up to approximately 90</p>

(2) Site Maximisation

Overview	Site maximisation to accommodate up to 350 homes in addition to the 21 identified in the SHLAA.
Contribution to New City Concept	This scale of growth would not significantly contribute to the Council's New City Aspiration.
Green Belt implications	An extension of this scale could be achieved without impact on the strategic importance of the Green Belt given the general areas surrounding Winwick all perform moderately. It is likely to require parcels making a weak and moderate contribution to the Green Belt to be developed. A sustainable settlement extension could be accommodated without releasing parcels making a strong contribution.
Supporting Role of Town Centre	Not applicable for this scale of development
Primary school implications	Winwick primary school has limited capacity but the site is constrained to expand the existing school. This growth option is likely to require an additional 0.5 form entry. Given the locality of schools in north Warrington, pupils may also access schools in Culcheth and Croft although these are at or near capacity. The cumulative impact of this option will therefore need to be considered with potential development elsewhere in north Warrington.
Secondary school implications	Secondary school provision for Winwick is most likely accessed at Culcheth High School or Beamont Collegiate Academy. Culcheth High School has limited capacity. This is forecast to be used up early in the plan period although capacity may begin to emerge later on in the plan period. There is not any potential for expansion due to site constraints and HSE exclusion zones. Beamont Collegiate Academy has limited spare capacity, but again this is forecast to be used up early in the plan period. Whilst new pupils living in Winwick may be accommodated, the cumulative impact of other development sites within Culcheth and other settlements in north east Warrington and centre would need to be considered.
Health facility implications	This scale of growth could be accommodated by capacity within existing facilities within the main urban area of Warrington. Depending on growth elsewhere in this part of the borough, this may cumulatively result in capacity issues which could require an expansion of existing facilities.
Local Road Network	A settlement extension could potentially cause some increase in traffic levels and delays on the local highways network at peak travel times. This may be mitigated by selective local highways improvements depending on the specific sites brought forward.
Strategic Road	This scenario could cause some increase in traffic levels and delays at M62 J9, and M6 J22. This may require further

Network	empirical assessment by Highways England to gauge the exact level of the impact on the SRN and the future investment required to mitigate the traffic growth.
Public Transport	It is unlikely that a sustainable settlement extension could help sustain local bus services due to the small base and very high car ownership in this village.
Active Travel	An increase in travel demand towards key destinations in north Warrington would necessitate the consideration of direct, safe and segregated routes alongside the primary routes to cater for walking and cycling journeys. The design and layout of any development should ensure that active travel opportunities are not compromised.
Open Space, Sport and Recreation	A settlement extension would place additional demands on existing open space provision but would not be of sufficient magnitude to require new provision over and above localised provision of informal open space and children's play areas. A sustainable settlement extension would also put pressure on existing sports pitches/facilities and there will be a need for upgrading of existing sports facilities (including swimming pool provision) to cater for the increased demand, in the nearby settlement of Culcheth and/or in the main urban area of Warrington.
Character implications	The scale of growth would increase the size of Winwick by over 50% and would have an impact on its existing character and will have some impact on the surrounding landscape.
Delivery issues	The uplift in land value from potential development sites is considered sufficient to deliver the level of infrastructure required to support this level of growth.. There are a number of development options that are likely to prove viable.
Environmental considerations & prudent use of resources	No significant environmental constraints.
Any other issues	N/A
Comparison with Plan objectives & overall assessment	An extension of this scale could be provided without having a major impact on the Green Belt, but the issue of primary school capacity would need to be addressed. In general it does not perform well against the objectives of the Plan, and is likely to impact on the character of the settlement.

In the above Call For Sites Responses & SHLAA GB Sites map

The three areas that are under threat by development are shown on the Call for sites map as the areas in colour pink. These are plausible areas where the Scots final skirmishes happened before being defeated and held prisoners in Winwick Church.

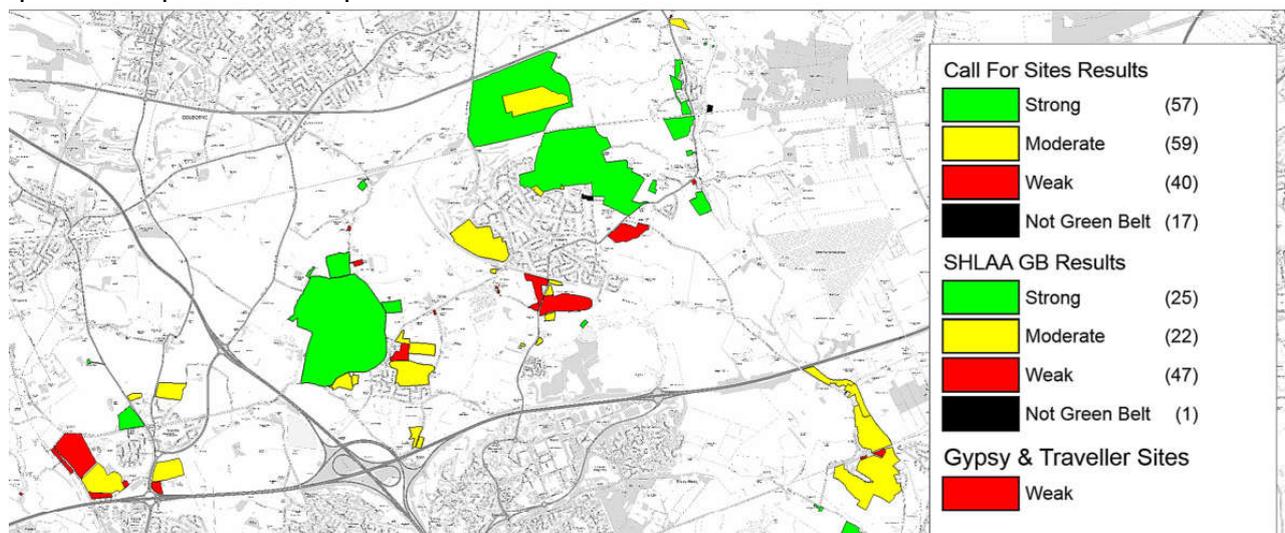
The other maps show the current status of these fields especially the Green Belt and agricultural status

From the website document

Area_Profiles_and_Options_Assessments___Technical_Note_July_2017.pdf in paragraph 4.12 shows:

- 4.12 The Call for Sites exercise also provided the possibility of a number of development sites which could potentially be located to the north and east of the borough. Through undertaking the area profile assessments and more detailed site assessment work, these areas were not considered to be reasonable development options for urban extensions. The sites in the east are subject to a number of environmental constraints, including the location of Peat, Rixton Moss Local Wildlife Site, proximity to Woolston Eyes SSI and part of the area being within Flood Zone 3. The sites in the north raised environmental concerns given their proximity to the M62 and in order to provide an extension of sufficient size, would result in the urban area merging with Winwick, resulting in a significant detrimental impact on the character of the settlement.
- 4.13 The individual sites in these areas are however considered as potential sites under the dispersed pattern of Green Belt release component / option.
- 4.14 The dispersed component is an approach whereby the individual development sites would be assessed on their own merits with greater dispersal of development around the main urban area. However, given the location of sites, the scale of growth and the infrastructure constraints in the main urban area, for this option to be reasonable, it is likely that there would still need to be at least one larger concentration of sites. This would effectively still result in an urban extension, similar to the urban extension components considered above or in the Areas Profiles. This could include smaller urban extensions in the South East than proposed in the Garden City components.

The Website document for The Green Belt GB_Extra_Assessments_Final_July_2017.pdf shows the detailed status for the three fields in question: A part of the map from the document



Larger image of the three fields



It is these fields that are in need of making Warrington Borough Council aware as to the national Asset with respect to the recording at least of these fields. As it is the responsibility of the Council to protect under the guidelines of Laws and Treaties from the European Union which have been incorporated into the respective member state's law to which the United Kingdom has complied.

European Union

Since 1973, the United Kingdom (UK) joined the European Economic Community (EEC), later became the European Union (EU), where all the Treaties, Regulations and Directives of the EEC (EU) the before and after 1973, were incorporated into the United Kingdom Law. Some of the Treaties and Directives that apply to planning aspects of Member States to which the UK is a part must adopt within a stated time-period.

- a) European Treaty Series - No. 18 European Cultural Convention, Paris 19.XII.1954
- b) European Treaty Series - No. 66 European Convention on the Protection of the Archaeological The Second English Civil War: Winwick Pass 19 August 1648 Page 2 of 97 Heritage London, 6.V.1969
- c) European Charter of the Architectural Heritage – 1975 - Adopted by the Council of Europe, October 1975
- d) Council of Europe Committee of Ministers Resolution (76) 28 - Concerning the adaptation of Laws and Regulations to the requirement of integrated conservation of architectural heritage 14 April 1976.
- e) European Treaty Series - No. 121 Convention for the Protection of the Architectural Heritage of Europe Granada, 3.X.1985
- f) European Treaty Series - No. 176 European Landscape Convention Florence, 20.X.2000
- g) European Treaty Series - No. 199 Council of Europe Framework Convention on the Value of Cultural Heritage for Society Faro, 27.X.2005
- h) Strategic Environmental Assessment (SEA) Council Directive 2001/42 27 June 2001
- i) Environmental Impact Assessment (EIA) Council Directive:
 - i. 1985/0337 27 June 1985

- ii. 1997/0011 (amended 1985/0337) 03 March 1997
- iii. 2011/0092 (codified 1985/0337 and 1997/0011) 13 December 2011
- iv. 2014/0052 (amending 2011/92/EU) 16 April 2014 (this amended directive must be adopted and assimilated into law on or before 16 May 2017 by the EU Member States)

The European Treaty Series of Conventions detailed above all apply regardless of whether a SEA or EIA Directive is required or not when assessing an application for a project that affects a Cultural Heritage site.

The above European Treaty Series a) to g) have applied to all planning aspects regardless of the application of environmental assessments since 1954. It is only in the EIA 2014/0052 that the Treaty Series has been incorporated (presumably due to the Treaty Series having not been applied in planning projects and/or developments), to ensure Member States comply with these Treaties on Cultural Heritage with respect to planning.

For Cultural Heritage is defined under the European Treaty Series No 199:

“Article 2 – Definitions

For the purposes of this Convention,

- a) cultural heritage is a group of resources inherited from the past which people identify, **independently of ownership**, as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. It includes all aspects of the environment resulting from the interaction between people and places through time;
- b) a heritage community consists of people who value specific aspects of cultural heritage which they wish, within the framework of public action, to sustain and transmit to future generations.

Article 4 – Rights and responsibilities relating to cultural heritage

The Parties recognise that:

- a) everyone, alone or collectively, has the right to benefit from the cultural heritage and to contribute towards its enrichment;
- b) everyone, alone or collectively, has the responsibility to respect the cultural heritage of others as much as their own heritage, and consequently the common heritage of Europe;
- c) exercise of the right to cultural heritage may be subject only to those restrictions which are necessary in a democratic society for the protection of the public interest and the rights and freedoms of others.

Article 5 – Cultural heritage law and policies

The Parties undertake to:

- a) recognise the public interest associated with elements of the cultural heritage in accordance with their importance to society;
- b) enhance the value of the cultural heritage through its identification, study, interpretation, protection, conservation and presentation;
- c) ensure, in the specific context of each Party, that legislative provisions exist for exercising the right to cultural heritage as defined in Article 4;
- d) foster an **economic** and **social climate** which supports participation in **cultural heritage activities**;
- e) promote cultural heritage protection as a central factor in the mutually supporting objectives of sustainable development, cultural diversity and contemporary creativity;
- f) recognise the value of cultural heritage situated on territories under their jurisdiction, regardless of its origin;

g) formulate integrated strategies to facilitate the implementation of the provisions of this Convention.”

It is clear that WBC has a responsibility to preserve National Assets as the assets are not the preserve of the owner to do with how the owner feel fit as History being a national asset belongs to the nation. The owner and the local councils, as well as by inclusion by the NPPF the Local People. To preserve historical assets for future generations. The Historical Asset is also a Green Belt very special circumstance that both WBC and the respective owners of these fields have failed to show. As a consequence stops these fields from being released from Green Belt and the Local People insist these fields are removed from the Preferred option of the Local Plan Review 2017-2037

The Local People insist that the Local Plan 2017-2037 has a Policy paragraph(s) to make it the responsibility for future developments that are brought forward by a developer, in order to protect and record the nations historical assets from being lost or destroyed to add the local plan 2017-2037 the following:

Paragraph 1

“The area shown in the on the map as bounded by yellow that no removal of historical assets (finds) to occur, with or without the owners permission, unless the finds are recorded by GPS, depth, pictures, date and time, Owners name and the finders name. Once the find(s) have been recorded on site, removed and handed over along with the recorded information to the Finds Liaison Officer at Museum of Liverpool for official recording.”

Paragraph 2

“Before any development or any form of work(s) whether agricultural related, new house(s) or any other form of development are carried out on the historical asset area as shown on the map marked by the yellow border, the developer/owner must first carry out (the costs to be paid by the developer) an archaeological survey team under supervision of the Battlefields Trust/English Heritage - so that the site(s) are recorded for posterity for the nation before destruction of the asset has occurred.”

The reason for having the paragraph(s) added to the Local Plan 2017-2037 at the actual site where the battle of Winwick Pass 19 August 1648 took place the field known as Pool Meadow (in WBC area) as shown on the Tithe Plan 1835 and Tithe Information 1849 has had many tonnes of waste rubble and covered with top soil to raise the field Pool Meadow. No known official Archaeological survey to record the historical asset of the battle has been released or known to have been recorded prior to the destruction of the site. Although the action was raised with Winwick Parish Council, unfortunately after the destruction had commenced. Warrington Borough Council was informed stating the land owner under agricultural usage was allowed under planning laws to perform the said development of Pool Meadow. This means the loss of the ability to record vital information of the last battle what is known as the Second English Civil War as a result of the defeat of the Scots at Winwick, lead to execution of King Charles five months later.

One further point with protecting the Battle of Winwick Pass and also going for protection of this area is these are in green belt and on a recognised battlefield - as shown by WBC local plan July 2014 Land Characteristic Assessment for the Winwick Area where WBC agreed that they would like the battlefield 1648 registered.

Warrington gov uk LCA_Chapter_7_Land_Type_1.pdf page 78 states:

“This is Warrington’s only recorded battlefield. Although it is not on the English Heritage Register of Battlefields, the significance of what was clearly a substantial action – not a mere skirmish, in terms of casualties and prisoners - and the unspoilt nature of the area suggests that the site of the Red Bank Battle and pursuit should be afforded some protection.”

So Warrington Borough Council are aware but the Local Plan Review does not reflect the important Battlefield. Even though the Battle of Winwick Pass 19 August 1648 is on the Battlefields Trust website at <http://battlefieldstrust.com/resource-centre/civil-war/battleview.asp?BattleFieldId=90>

But despite this no measures by Warrington Borough Council are in place to protect the historical asset.

This the Local People insist this Historical Asset is preserved and the three fields removed from the Preferred Option in the Local Plan Review 2017-2037.

With regards to Traffic access the two fields where the field at locations 1 has to use the A49 solely and the field at location 3 has to use the A49 and Hollins Lane, adding to the already congested road morning and evenings. This does not help the exceptional circumstances for the release of Green Belt.

Locations 4, 5, 6 and 7

These location of fields are shown by the pink border not filled-in on the following map



The locations 4 and 5 next to Mill Lane and Delph Lane have locational transport issues due to access via Delph Lane and Hollins Lane to the A49, and have an alternate route to Warrington via Calver Road to the A574. This alleviates the need to use the A49. Although in Green Belt it does not contribute to the narrowing of the Green Belt.

Further there is a natural boundary of the West Coast Main Line Railway. The Local People would not see if these two fields were released from Green Belt as a problem. The developer would have to consider one major problem with these two fields at Location 4 and 5 is the High Pressure Gas Transmission Winwick-Shevington Pipeline is located in these fields. Therefore discussions with National Grid regarding the 6 metre exclusion zone and 0.5 metre depth restriction (see WBC Planning Application 2016/29083 for National Grid Health and Safety Guidelines), in order to create a masterplan. This release of Green Belt with guidance from National Grid has the ability for bringing forward 1000 new homes and employment zone according to the Call for sites document. Which more than compensates for the loss the three field at Location 1, 2 and 3 from not being included in the Local Plan Review Preferred Option 2017-2037. and the Local People put forward Locations 4 and 5 in their Preferred Option.

The Locations 6 and 7 on the former Delph Hospital site though the only access is via Townsfields Road on to the A49, this would cause congestion problems but could be corrected by traffic light management. Though the Local People see these two fields one used as a car boot area. The entrance is unsightly due to the activity, and is in need of being modernised the fact the developers have shown by bringing forward in the call for sites. With only the access really being a problem the release from green belt is acceptable, but maybe towards the later stages of the Local Plan review plan period 2017-2037.

The location 8 off Southworth Lane and Winwick Lane

The main problem with location 8 is access to the site.



The volume of traffic from the houses to impact on Winwick via Myddleton Lane in the morning and evening on an already congested route. The other access via A579 Winwick Lane would impact Lane Head an already congested area due to the A580. Also the M6 J22 would be further impacted. WBC by not including this location in their Preferred option appears to be a sensible conclusion. Although location 8 may be looked at a later date once certain developments come forward ie Parkside and the traffic management is known at that time.

The Location 12 and 13 St Helens Council Parkside Development

With the uncertainty of the continual saga of Parkside Rail Freight Terminal or is it a Strategic Rail Freight Intermodal Terminal (SRFI) since 1993. It seems now Parkside to be only a warehouse development with the only access to and from by road. In St Helens Local Plan Update consultation at the end of 2016 the proposed access was via the A49 southern direction only from the Winwick and not via Newton-le-Willows direction. St Helens Council proposed in their Local Plan Policies that WBC will be the route only to access Parkside via the A49. So St Helens Council who incidentally are the part owners with Langtree and also developers as it is St Helens council who are and have developed and paid for the documentation, hence St Helens Council are the developers. So What St Helens Council are requesting that directly affects the Local People of Winwick and of Warrington by using the Winwick section of the A49 to impact thousands of HGV vehicles through Winwick from the boundary at/near to Hermitage Green Lane to the M62 Junction 9 and to the M6 J22 via the Winwick Link Road. To enable what was to be a SRFI but now from the plans just Warehousing with no rail related facilities. By using the A49 through Winwick the recent consultations stated that the Winwick A49 to M62 requires a budget of between £5 Million to £6 Million to upgrade the road network just to accommodate the HGVs to enter or exit Parkside from only the A49 to serve the Phase 1 and Phase 2. The SRFI stage known as phase 3 will never come to reality if the Parkside link Road can not be justified. But phase 1 and phase 2 will go ahead regardless of whether or not the Parkside Link Road is approved. This means Winwick is facing at least the following scenarios:

First, St Helens Council will go ahead with Phase 1 and phase 2 This means Winwick will have the HGV traffic imposed on them along the A49.

Second, If the Parkside Link Road goes ahead then several things will be placed on Winwick where the history will be destroyed, as the link road is to use the Parkside Road/M6 over bridge to access the M6 J22 at Woodhead Farm:

- The settings of the to listed Buildings of Woodhead Barn and Farmhouse;
- The setting of the Listed building and monument of St Oswald's Well;
- The Battle of Maserfeld 05 August 642AD will be destroyed at least if there is archaeology that will be destroyed. If the battle did occur at Woodhead where King Penda of Mercia killed King Oswald where the head and arms cut from Oswald's body and placed on

wooden stakes to threaten the Northumbrian People that King Penda of Mercia.

- Third Hermitage Green and Winwick along the A573 will be impacted with HGV driving down the A573 to get to Parkside, in preference to using the Motorway.
- Forth, The Battle of Winwick Pass 19 August 1648 will be destroyed.

Then the extra traffic at Woodhead can go to Winwick or Golborne and not just to the M6 J22. This will happen when drivers take the shortest route which is not by using the M6.

Although the A49 ceased to be a trunk road on 01 April 1978, as announced in the London Gazette Official Publication of the Notice of Order below:

The London Gazette, 17 March 1978, Pages 3439 and 3440

HIGHWAYS ACTS 1959 TO 1971

The Winchester-Preston Trunk Road (From the former Warrington County Borough Boundary to the Merseyside County Boundary) (Detrunking) Order 1978.

The Secretary of State for Transport hereby gives notice that he has made an Order under section 7 of the Highways Act 1959, the effect of which is to provide that roads about 3.42 miles in length being (a) that length of road from the former Warrington County Borough boundary 164 yards north of Sandy Lane West to the Merseyside County boundary at Red Bank known locally as Winwick Road, Winwick and Newton Road, Winwick (2.32 miles in length) and (b) that length of road from the junction of Winwick Road, Winwick and Newton Road, Winwick to the Merseyside County boundary at its roundabout junction with the M6 (junction 22) known locally as Winwick Link, Winwick (1.10 miles in length) all in the Borough of Warrington), shall cease to be a trunk road as from 1st April 1978 when the Cheshire County Council will become the highway authority responsible for those lengths.

Copies of the Order and of the relevant plan have been deposited at the Department of Transport, 2 Marsham Street, London S.W.1, and at the offices of the Regional Controller, Departments of the Environment and Transport (Roads and Transportation), North West Region, Sunley Building, Piccadilly Plaza, Manchester, M1 4BE, and at the offices of the County Secretary, Cheshire County Council, County Hall, Chester, CH1 1SF, the Chief Executive, Warrington Borough Council, Town Hall, Warrington, WA1 1UH and Cheshire County Council, Highways Department,, Preston Brook, near Warrington, Cheshire, WA7 3AT, where they are open to inspection free of charge at all reasonable hours. (Quoting reference number NWRT 5046/80/8).

Copies of the Order, the title of which is "The Winchester-Preston Trunk Road (from the former Warrington County Borough Boundary to the Merseyside County Boundary) (Detrunking) Order 1978", (S.I. 1978 No. 356) can be purchased price 10 pence through booksellers or direct from government bookshops (HMSO).

Any person aggrieved by the Order and desiring to question the validity thereof, or of any provision contained therein, on the ground that it is not within the powers of the Highways Act 1959 or the Highways Act 1971 or on the ground that any requirement of either of those Acts, or of regulations made thereunder, has not been complied with in relation to the Order, may, within 6 weeks from 17th March 1978 apply to the High Court for the suspension or quashing of the Order or of any provision contained therein.

9th March 1978.

J. N. Atkinson, Chief Administration Officer to the Regional Controller (Roads and Transportation) North West Region.

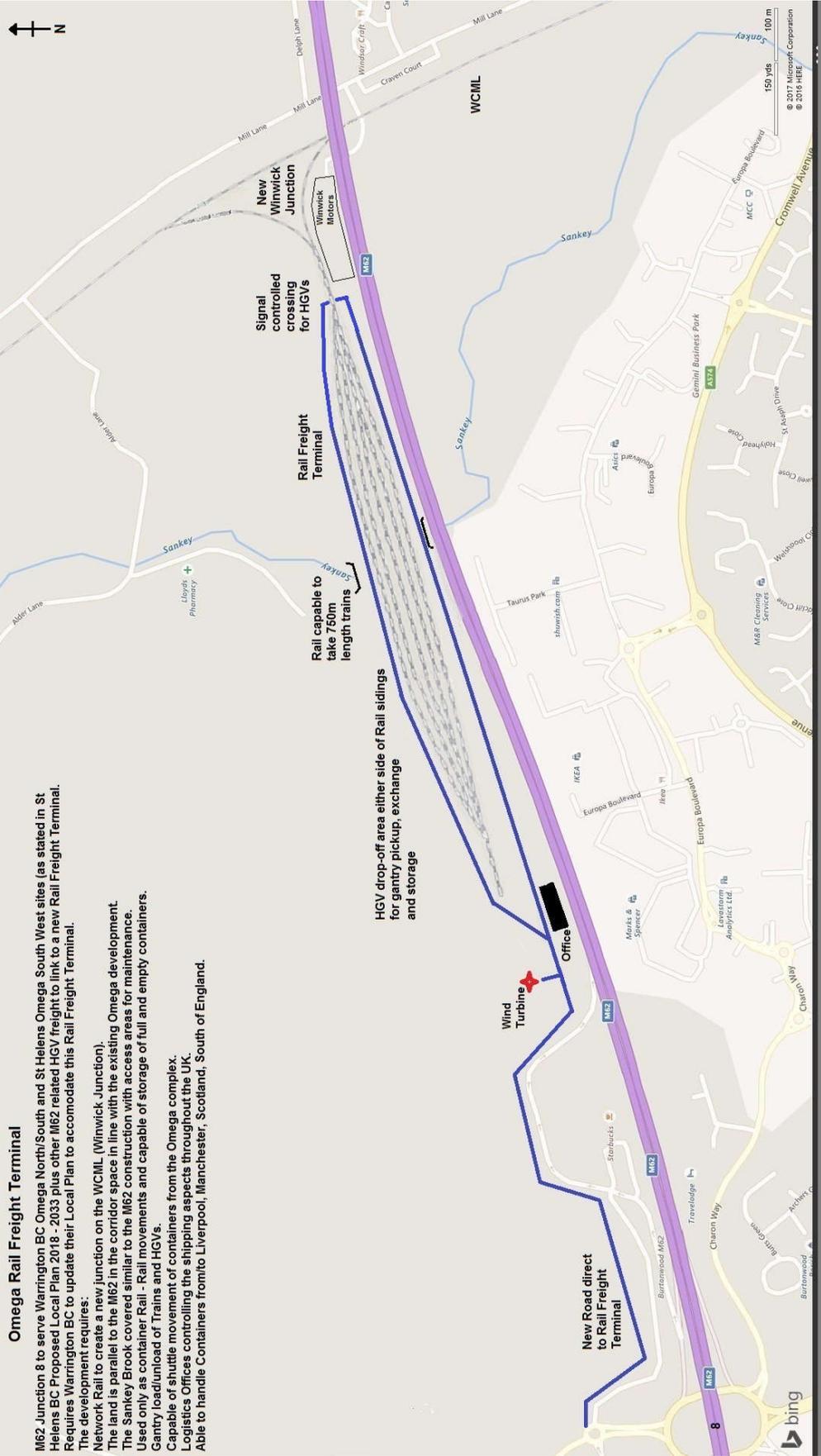
The A49 ceased to be a trunk road due to the M6 motorway being a primary highway, and where trunk roads that ran parallel to a motorway it was detrunked. In order for main heavy traffic to use the Motorway over the trunk road, freeing the detrunked road of the heavy traffic. What St Helens is now doing is effectively turning the A49 back into a trunk road with all the HGVs entering Parkside via the A49.

So Winwick has been promised along with WBC that the Parkside Link Road will solve the Traffic problems. The A49 and A573 will have extra HGV impacts hence why St Helens Council want to upgrade the A49 at Hollins Lane to the M62, in Winwick and modify the A573 in Winwick. In order to alleviate the traffic on these two roads. How to reduce the traffic. It is suggested that the SRFI will never happen but Phase 1 and Phase 2 and maybe the Link Road which will all be non-rail related road movements.

The Location 9 the Rail Freight Terminal at Omega

The opportunity exists now for Warrington to step in at Omega with a dedicated Rail Freight Terminal that serves the Omega companies. This will reduce the Road traffic and create more jobs with future rail related businesses at Omega. It will compliment Port Warrington and in fact Port Warrington will be linked by rail to the Omega Rail Terminal via the WCML link this would reduce container traffic driving south-north and north-south through Warrington. The advantage of a rail freight terminal at Omega is the Warehousing is already there all is required is the railway lines the gantries etc to take the containers and place on the trains. The current owners of the proposed are already in business so to spread their business wings just needs the right push to realise future profits. Together with the companies already there, if willing to see the advantages of reducing HGV fuel costs, the proposed Rail Freight Terminal has merit. The following map of the area and a schematic of where the Rail Freight Terminal can fit in with the Omega companies:





Omega Rail Freight Terminal

M62 Junction 8 to serve Warrington BC Omega North/South and St Helens Omega South West sites (as stated in St Helens BC Proposed Local Plan 2018 - 2033 plus other M62 related HGV freight) to link to a new Rail Freight Terminal. Requires Warrington BC to update their Local Plan to accommodate this Rail Freight Terminal.

The development requires:

- Network Rail to create a new junction on the WCMIL (Winwick Junction).
- The land is parallel to the M62 in the corridor space in line with the existing Omega development.
- The Sankey Brook covered similar to the M62 construction with access areas for maintenance.
- Used only as container Rail - Rail movements and capable of storage of full and empty containers.
- Gantry load/unload of Trains and HGVs.
- Capable of shuttle movement of containers from the Omega complex.
- Logistics Offices controlling the shipping aspects throughout the UK.
- Able to handle Containers from to Liverpool, Manchester, Scotland, South of England.

The Locations 10 and 11 St Helens Omega North and South extension

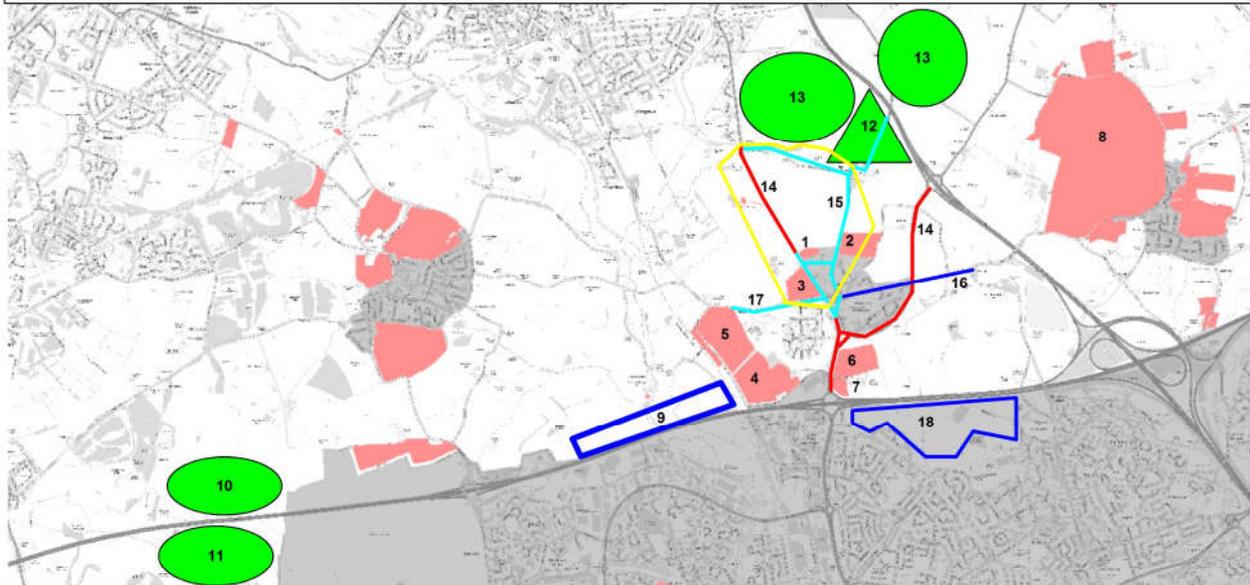
In St Helens Council Local Plan update they propose that where Warrington Omega borders St Helens, their Local Plan can extend Omega by using the Omega road network to access St Helens Omega via Warrington Omega to use the M62 J8 for motorway access and incidentally the A49 at junction 9. Effectively St Helens has put all the CO2, diesel emissions, traffic congestion on the plate of Warrington to solve, together with Parkside traffic congestion being placed on the plate of Warrington. This is no duty to co-operate: it is passing the buck. The Local People see through St Helens Council easy option for them. The Local People reject St Helens Link in to Warrington Omega, let St Helens Council use the M62 J7 in their borough.

The only advantage of having St Helens Omega linked to Warrington Omega is if the Omega Rail Freight Terminal is built, less CO2, less diesel emissions, less traffic congestion. The fuel running cost to Parkside SRFI as compared to Omega SRFI from Omega is obvious.

Hence the Local People put forward the Omega Rail Freight Terminal as a proposal for consultation as a part of the Local Plan Review 2017-2037.

Location 14, 15, 16, and 17 The A49, A573, and Winwick Local Roads

As the A49 is a detrunked road the proposition by St Helens Council to use the A49 and A573 for there Parkside development puts the village of Winwick under an enormous threat from air pollution, Noise, Traffic congestion. So the Local People propose to be added to the Local Plan Review 2017-2037, due to the increased traffic that St Helens Council Parkside Development will impose of the village of Winwick and to the Local people. The traffic calming measures to be introduced between the North of the M62 J9 to the Boundary line to the north of Hermitage Green Lane Winwick Traffic island on the A49 along Winwick Link Road to the M6 J22 as detailed on the following map locations 14, 15, 16 and 17



- Locations 1, 2 and 3 - These fields are skirmish areas in the English Civil War battle of Winwick Pass require an Archaeological Survey prior to any development, area bordered in yellow is the approx area where fighting took place. Local Plan to include in a Policy a paragraph "Any development in the yellow area first require an archaeological survey to record the battlefield area" Reported: Civil War finds from these fields no record at Finds Office, Museum of Liverpool
- Locations 4 and 5 - These fields have the High Pressure Gas Transmission Winwick-Shevington Pipeline. Contact National Grid for approval of any development
- Locations 6 and 7 - Any development will impact on the traffic A49/M62
- Location 8 - Development will require access to Winwick Lane - increase in Traffic at Lane Head and M6J22
- Location 9 - Addition to the Omega development site to ease the traffic on local roads area prime for a Rail Freight Terminal to serve Omega and traffic from M62/M6
- Locations 10 and 11 - St Helens Council Local Plan Proposal to use road network in Warrington Omega development to use M62 J8 for access not M62 J7. Not shown in the Warrington Local Plan as an impact to the traffic problem on the A49 etc
- Location 12 - Area required by St Helens Council to accommodate the Parkside SRFI, without the SRFI is not feasible. Traffic problems at Hermitage Green Village and Winwick village due to SRFI traffic not manageable. Not in WBC Local Plan
- Location 13 - St Helens Council requires that Parkside SRFI need to impact on the A49 and A573 through Winwick to access the M62 and other road south. Not in the WBC Local Plan Traffic assessment
- Location 14 - The detruncked Winwick section of the A49, 1 April 1978 due to running parallel with the motorway M6 truck road, from Hermitage Green Lane to M62 J9 and Winwick Link Road. Change to 30mph congestion charge cameras for HGV only. (20mph A49/A573 junction to Old Schoolhouse Lane)
- Location 15 - A49/A573 junction to Parkside Road M6 Bridge, Green Lane, Hermitage Green Lane change to 20mph and congestion charge cameras for HGV only
- Location 16 - Myddleton Lane congestion charge cameras for HGV only
- Location 17 - Hollins Lane change to 20mph; congestion charge cameras for HGV only
- Locations 14 and 17 - Hollins Lane Junction to M62 reported £5M to £6M modification investment required only to accommodate St Helens Council as being the part owner as well as being the developer to enable access to their Parkside Warehouse development only (not SRFI) from the A49? Not in WBC Local Plan
- Location 18 - Area known as Peel Hall to be reclassified from Green Field to Green Belt and to merge with Radley Common as Common Land. To enable the whole area to be classified as a Country Park and Nature Reserve for the benefit the Local People for this and future generations

The reduction in speed has been raised by local people and with St Helens if their Parkside project is approved the increase in HGV traffic will increase so in order to address the pollution from air and noise a congestion charge system similar to the system used in London where the installation of the camera system is straight forward together with a proven monitoring charging system for transgressors. The system is aimed at charging HGVs that use the A49 north or south this will stop any vibration to Winwick Church from the decrease in HGVs passing. The charging penalties after administration costs: 10% to go to Winwick Church, 10% to go to Winwick Parish and the rest to Warrington Borough Council.

Location 18 Peel Hall

The Local People once and for all need to settle the problem of Peel Hall for the area has been enjoyed as a nature reserve and country park despite the numerous planning applications and legal challenges. The site therefore is not wanted as housing development.

Therefore the Peel Hall site in the Local Plan Review 2017-2037 that the greenfield site only use is to be registered as Common Land and along with Radley Common (where the ownership still remains separate), to become a nature reserve and country park.

Only a planning application concerning Peel Hall that accords with the Local Plan the decision-taking will be approved. This is the option in the Local Plan Review that the Local People consider fair for this and future generations to enjoy Peel Hall as a Country Park and nature reserve educating the young and old alike.