



GRAPPENHALL AND THELWALL PARISH COUNCIL

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14th June 2019

F.A.O. Mr Michel Bell
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New Town House
Buttermarket Street
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Dear Mr Bell

Ref. South Warrington Parish Council's Local Plan Working Group: Response to the Local Plan PSV Consultation

Please find attached a response to the Warrington Borough Council's Local Plan (proposed Submission Version) from the South Warrington Parish Council's Local Plan Working Group. This Submission contains the agreed views of the six Parish Councils identified in the introductory section of the document itself as members of the Working Group (Lymm, Grappenhall and Thelwall, Appleton, Stretton, Hatton and Walton).

The Grappenhall and Thelwall Parish Council provides administrative support to the Working Group and should be treated as the contact point for any future correspondence.

Individual Parish Councils represented by the Working Group will be also making their own supplementary representations to the Borough Council enlarging on matters of particular local concern.

Yours sincerely

[REDACTED]

Councillor Clifford G Taylor
Chairman of the South Warrington Parish Council's Local Plan Working Group



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**The South Warrington Parish
Councils' Local Plan Working Group
Representations to the Submission
Draft of the Warrington Borough
Local Plan**

Client	The South Warrington Parish Councils' Local Plan Working Group
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1 Introduction

1.1 Groves Town Planning has been commissioned to prepare representations to the submission draft of the Warrington Local Plan.

1.2 The South Warrington Parish Councils' Local Plan Working Group (SWP) formed in response to the Preferred Development Option issued by the Borough Council in the summer of 2017. Such was the level of community concern over the scale of development proposed for South Warrington, much on land which would have to be released from the Green Belt, that uniquely 6 Parish Councils covering South Warrington agreed to work collectively in presenting their concerns to the Borough Council. (Lymm, Grappenhall and Thelwall, Appleton, Stretton, Hatton and Walton). In addition Moore Parish Council, in Halton Borough but directly affected by development in South West Warrington, joined the Working Group and has contributed to its output.

1.3 The representation is set out as follows

- National Policy Context
- A portrait of South Warrington
- Summary of issues leading to the conclusion that the plan is not sound and should not be adopted in its present form
- Issues relating to Growth
- Issues relating to Housing Supply
- Issues relating to Employment Land
- Issues relating to Green Belt release
- Issues relating to infrastructure provision

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- Issues relating to Air Quality
- Issues relating to Environment
- Issues relating to Ecology
- Issues relating to Character and Distinctiveness
- Issues relating to Sustainability
- Issues relating to Deliverability
- Appraisal of specific policies
- Issues relating to Community Engagement

1.4 A conclusion will appraise these issues and how in the opinion of the South Warrington Parish Councils (SWP) they show that the plan is not sound and should not proceed to adoption in its present form.

1.5 This stage of the process has been reached following the publication of a Preferred Developments Option (PDO) in June 2017. The PDO was produced with limited preamble or discussion as to possible issues prior to publication. The scale of the development proposed directly contradicts the extant development plan in terms of approach and objectives. It was not surprising therefore that it attracted a high level of concern and anxiety in the community. The implied level of precision shown in plans resulted in unprecedented concern over the impact of highways schemes and other development proposals on resident's homes and business. The PDO attracted over 4500 responses.

1.6 The process of taking the findings of the PDO and producing a submission draft has been notably poor in terms of engagement with community groups. See section 18 below.

2 National Policy Context

2.1 It is recognised that the Borough Council has a statutory obligation to produce a development plan – *“ which provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities and a platform for local people to shape their surroundings.”* [NPPF 2019 para 15]

2.2 Relevant paragraphs of the Framework are summarised below with sections relevant to the core of this representation highlighted.

2.3 *“Achieving sustainable development means that the planning system has three overarching objectives.... an economic objective; a social objective and an environmental objective.*

These objectives should be delivered through the preparation and implementation of plan.....” [NPPF 2019 Paras 8 and 9]

2.4 *“Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Strategic policies should as a minimum provide for the objectively assessed needs for housing and other uses, as well as needs that cannot be met within neighbouring areas, unless:*

- *The application of policies within this Framework that protect assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- *Any adverse impacts of doing so would so significantly outweigh the benefits when assessed against the policies in this Framework as a whole.”* [NPPF 2019

Para 11]

2.5 *The planning system should be genuinely plan led. Succinct and up to date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities and a platform to help local people to shape their surroundings.*

Plans should:

- *Be prepared with the objective of contributing to the achievement of sustainable development;*
- *Be prepared positively, in way that is aspirational but deliverable;*
- *Be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- *Be accessible through digital tools to assist in public involvement and policy presentation; and*
- *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. [NPPF 2019 Paras 15 and 16]*

2.6 *Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period...except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms. [NPPF 2019 Para 23]*

2.7 *The preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focused tightly*

on supporting and justifying the policies concerned, and take into account relevant market signals. [NPPF 2019 Para 31]

2.8 *Significant adverse impacts of these objectives should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where sufficient adverse impacts are unavoidable, suitable mitigation measures should be proposed. [NPPF 2019 Para 32]*

2.9 *Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing required along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure) Such policies should not undermine the deliverability of the plan. [NPPF 2019 Para 34]*

2.10 Plans are sound if they are positively prepared and are consistent with achieving sustainable development; are justified if based on proportionate evidence; are effective in being deliverable within the plan period and consistent with national policy [NPPF 2019 Para 35]

2.11 *"It is important that a sufficient amount and variety of land can come forward where it is needed..." [NPPF 2019 Para 59]*

2.12 *".. the minimum number of homes needed... should be informed by a local housing needs assessment.... unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends..." [NPPF 2019 Para 60]*

2.13 *"...policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. [NPPF 2019 Para 61]*

- 2.14 *The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities strategic policy making authorities should identify suitable locations for such development where this can help to meet needs in a sustainable way. [NPPF 2019 Para 72]*
- 2.15 *“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should set out the specific rate of development for specific sites. [NPPF 2019 Para 73]*
- 2.16 Planning policies should support economic growth. Areas should build on their strengths. Each area should build on its strengths and counter any weaknesses. Planning policies should recognise and address specific locational requirements of different sectors including for storage and distribution in suitably accessible locations. [NPPF 2019 Paras 80-82]
- 2.17 Planning policies should support the role that town centres play at the heart of local communities [NPPF 2019 Para 85]
- 2.18 Planning policies should aim to achieve healthy, inclusive and safe places which ensure an integrated approach to considering the location of housing, economic uses and community facilities and services [NPPF Paras 91 and 92]
- 2.19 **Transport should be considered from the earliest stages of plan making.**
“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine

choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health". [NPPF 2019 Para 103]

2.20 Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding the environment and ensuring safe and healthy living conditions. Objectively assessed needs should be met in a manner which makes as much use as possible of previously developed land. [NPPF 2019 Para 117]

2.21 Planning policies should ensure that developments

- Function well and add to the overall quality of the area;
- Are visually attractive
- Are sympathetic to local character and history, including the surrounding built environment and landscaping setting;
- Establish and maintain a strong sense of place... welcoming and distinctive places to live work and visit. [NPPF 2019 Para 127]

2.22 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. [NPPF 2019 Para 133]

2.23 *"Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation and updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."*

"Before concluding that exceptional circumstances exist for changes to Green Belt boundaries, the strategic policy making authority should be able to demonstrate

that it has fully examined all other reasonable options for meeting its identified need for development". [NPPF 2019 Paras 136 and 137]

2.24 Where it found necessary to release land from the Green Belt first consideration should be given to previously developed land or land which is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environment quality and accessibility of remaining Green Belt land. [NPPF 2019 Para 138]

2.25 Planning policies should contribute and enhance the natural and local environment, recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services. Development should wherever possible help improve local environmental conditions. [NPPF 2019 Para 170]

2.26 Planning policies should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment. [NPPF Para 180]

2.27 Planning policies should sustain and contribute towards compliance with relevant limits for air quality [NPPF 2019 Para 181]

2.28 Existing businesses and facilities should not be unreasonably restricted as a result of new development [NPPF 2019 Para 183]

2.29 Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.

- Sustaining and enhancing the significance of heritage assets

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- Considering the desirability of new development making a positive contribution to local character and distinctiveness. [NPPF 2019 Para 185]

2.30 Local Planning authorities should identify and assess the significance of a heritage asset affected by a proposal. Where development would lead to substantial harm to the asset development should be resisted unless substantial public benefit outweighs that harm. [NPPF 2019 Para 195]

3.1 To fully understand the area and its context within Warrington and the wider area, it is considered important to record some of the key characteristics of the area, to provide a background to the evidence presented in support of the conclusions of the representation. This is particularly important as descriptions of the area within the Submission Draft and background papers lack accuracy and expose a lack of local knowledge.

3.2 South Warrington is separated from the rest of the Borough by its position south of the River Mersey and the Manchester Ship Canal, indeed it was only after local government reorganisation in 1974 that areas south of the Ship Canal ceased to be urban and rural districts within Cheshire and became part of the newly established Warrington Borough Council. Warrington itself ceased to be located with the administrative boundaries of Lancashire and came to be administered as part of Cheshire.

3.3 There is no formal definition of South Warrington, although the 2014 Core Strategy logically presented the Borough as having four neighbourhood areas. The town centre and inner wards; the west based around Gt Sankey, Penketh, Burtonwood and Winwick and the east based around Woolston, Birchwood and Culcheth. The southern neighbourhood was typically represented as the wards south of the River Mersey. For the purpose of considering the impacts of the Submission Draft the precise boundary is of no particular significance, whether the Ship Canal or the River the key concerns remain unaltered.

3.4 It is a unique characteristic of Warrington that it is divided by three separate major watercourses. Many towns have developed on opposite sides of a river, as is the case in Warrington, but history of the area has resulted in the creation of the Bridgewater Canal and later the Manchester Ship Canal. It is the presence of these waterways and their crossing points which is influential on the pattern of development which has taken place historically and how the Borough might develop in the future.

3.5 Parts of the area came to be considered as part of the designation of Warrington and Runcorn as a New Town in the mid 1960's. Areas to the south of Stockton Heath and east of Appleton were developed under Section 7(1) consents granted under the New Town Act. The development was not completed and significant highway infrastructure which had been proposed was not implemented. Land has since passed from the control of the Development Commission, through English Partnerships, to the Homes and Communities Agency and now to Homes England. It is considered that there is a lack of clarity over the extent to which historic consents have been passed on through this organisational and administrative change and that the Council should be challenged on any claim as to extant permission for development, particularly in the context of the disconnect from the approved New Town Master Plan and particularly the related infrastructure which was intended to support the development then proposed.

3.6 South Warrington is otherwise characterised by a collection of small settlements and villages. The settlements of Walton, Stretton, Stockton Heath, Grappenhall, Thelwall and Lymm all lie to the south of the Manchester Ship Canal. Each area has seen considerable development across the middle and later parts of the 20th century but each benefits from a historic core often based around the earliest settlements in

the area. These historic cores are identified as designated heritage assets. Each benefits from a setting within the Bridgewater Canal corridor and the close proximity of open countryside, the majority of which lies within the North Cheshire Green Belt as formally defined in successive development plans since the early 1990's.

3.7 Further south the settlement of Appleton has to a large extent already been subsumed by those elements of "New Town" development which was built in the 1970's and 1980's. This area lacks the character of other parts of South Warrington, but it does benefit from a high quality of landscaping with large areas of green space retained and maintained to a standard not repeated in later development. Notwithstanding the impact of this development the area benefits from its proximity to open countryside, access to open fields and woodland.

3.8 The villages of Hatton, Stretton (including Lower Stretton), Walton Village and Appleton Thorn continue to present as distinct settlements notwithstanding their proximity to the urban areas of South Warrington. Each village is based on a historic core with churches, village halls and public houses at the centre.

3.9 The character of the area is dominated by the proximity to open countryside with a landscape which generally slopes from south to north before it is intersected by the Bridgewater Canal corridor which runs west to east across the area. Much of the area is laid to agriculture with grade 2 and 3 classification. The area is interspersed with woodland and copses of trees often tracing historic water courses although the pattern of hydrology across the area has been altered with the advent of the Bridgewater and Manchester Ship Canals.

3.10 Although of an industrial origin the Bridgewater Canal has taken on the role of a key part of the landscape of Warrington, providing a tranquil tree lined corridor across the area.

3.11 Views southwards from the A56, A49 and A50 place Warrington in its context sitting at a point in the valley of the River Mersey where the river narrows and historically the first crossing point east of the estuary. Views north from these key gateways into the town and from the B5356 Stretton Road provide a vista across the town dominated by the spire of St Elphin's Parish Church.

3.12 South Warrington typically has an older and aging population compared to the rest of Warrington. The area has lower levels of deprivation, longer life expectancy and better health. In comparison with national and Warrington averages, higher numbers of residents in South Warrington are employed in professional and managerial roles and are much more likely to use the car as a means of travel to work. [WBC Ward Profiles 2018 and LGA Research Report – Demographic Report 2017]

3.13 A clear pattern exists for travel to work across Warrington. In the absence of a significant office based sector in Warrington Town Centre, those in higher professional and managerial roles will look to Manchester, Liverpool and Chester as locations for employment. Some of this group will be employed on Birchwood Park or Daresbury Science Park, although anecdotal evidence suggests that even though Warrington based, employment often focuses on core locations outside the Borough. Sellafield Ltd is a good example, with a Headquarters building in Birchwood but all of its core activity taking place on site in Cumbria. The implication is that residents of South Warrington who tend to work in higher professional and managerial roles will

work in Manchester and will commonly use the car as the main mode of travel to work.

3.14 2011 Census data indicates high inflows for employment from residences in St Helens, Wigan and Halton, with high outflows from residences in Warrington to Halton, Manchester, Trafford and Liverpool. The same data source indicates that more than 50% of those in employment in the South Warrington Parishes are in professional and managerial roles. [Warrington Borough Council – Borough Profile 2015/ONS]

3.15 Partly as a consequence of this travel to work pattern, residents of South Warrington tend to look to locations outside Warrington for shopping and leisure. Altrincham, Northwich, Knutsford and Runcorn provide preferred and more accessible locations. Shopping will often look to The Trafford Centre, Liverpool One and Cheshire Oaks as accessible locations with easier and often free parking.

3.16 This situation is a reflection of how South Warrington has developed as a dormitory settlement. The New Town Master Plan was not completed. The concepts behind the New Town are largely outdated. The Master Plan was a model based on accommodating use of the private car. The Submission Draft has a distinct similarity with the Master Plan. Such replication is troublesome given the desire to move away from dependence on the private car and the omission of large parts of the infrastructure envisaged to support the New Town Plan.

3.17 There is a disconnect between the southern areas of the Borough and the rest of the town, but established patterns of development, places of work, shopping and retail are entrenched and not readily changed.

3.18 To a large extent the pattern and urban form of South Warrington, the relationship of later development with historic villages and the setting within areas of open country has come to create a mature and distinctive character which would be significantly eroded by the scale, form and location proposed.

4 Summary of Key Issues

4.1 It is the contention of the Parish Councils that the Submission Draft Local Plan is not sound and fails to meet the expectations of paragraph 16 of the NPPF.

4.2 The Plan has not been positively prepared; is not appropriately justified; is not effective or deliverable and shows inconsistencies with national policy.

4.3 The plan is not sound and should not proceed to adoption in its present form.

4.4 This conclusion is reached on the premise that

- There is no justification for predicted levels of growth which are central to the spatial expression of the plan
- There is no sound or logical connection between aspirational growth and the spatial plan.
- There is consequently no justified need for the level of housing or employment development anticipated by the plan.
- There is no need for the scale of Green Belt release.
- There is no rational consideration of the existing levels of congestion or the impact of development on that congestion.
- Proposed infrastructure does not deal with existing pressures or issues of congestion and cannot therefore accommodate the additional demands of the proposed development.
- There is no need for development which will result in an unacceptable level of harm to air quality and the environment
- There is no need for development which will destroy the character and distinctiveness of Warrington and its constituent settlements.

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- The proposals are not sustainable and run counter to national policy.
- There is no clarity or certainty of the means of delivery of the planned proposals. Funding methodologies are flawed and unreliable and based on the unreliable returns expected from growth and development.
- There is concern over the ability to deliver truly affordable housing which is consistent with the concept of the Garden Suburb and the provision of new development in South Warrinton.

5.1 The Borough Council published an Economic Development Needs Assessment Update produced by Mickledore and BE Group in February 2019. Critically for Warrington the Study amongst other issues highlights the following:

- The strong connections between economic activity in Warrington and activity in neighbouring areas, notably Cheshire East and Cheshire West, Greater Manchester and Liverpool, highlighting development identified in the Greater Manchester Spatial Framework and the potential needs of the Port of Liverpool.
- How growth in Warrington is predicated by competition for a share of the wider economic development across the region.
- Competition for growth based on the Science and professional sectors in Halton, Cheshire and Manchester.
- Dependence on historic high levels of take up of employment land
- The use of the LEP Strategic Economic Plan Jobs Growth Scenario in predicting growth.
- Logistics land requirements driven by proximity to motorway junctions.
- Variation in forecasts from alternative providers and disregard of options based on those forecasts. Some appraisals prior to the production of the Preferred Developments Option in 2017 were suggesting growth levels of between 15% and 20% assessing patterns in GVA growth against the aspirations of the Local Enterprise Partnership (LEP) Strategic Economic Plan.

5.2 The SWP Working Group is concerned that the approach taken to the consideration of growth is unreliable and unrealistic. It is acknowledged as being underpinned by the unsubstantiated and business driven expectations of the Strategic Economic Plan (SEP). This body is not democratically accountable and is led by business interests with direct involvement in land released for development on back of the Needs Assessment. This concern is reinforced by the evidence of three different assessments with three different conclusions as to levels of growth produced at the point of production of the PDO.

5.3 The Borough Council looks to historic take up rates of employment land to justify future needs. Warrington has inevitably experienced higher than average rates in this regard as result of being able to deliver shovel ready development land at Birchwood and latterly Omega has attracted development to Warrington and away from other locations simply on the basis of availability. It is considered that this approach does not provide a sound basis for comprehensive and considered planning for future development needs.

5.4 It is understandable why Warrington would seek to maintain its status as a key destination for investment particularly around the logistics sector. However, given the high levels of employment within the Borough, there will be a need to import labour. Notwithstanding attempts to deliver a wide housing mix in new housing allocations, it seems unlikely that potential new residents so employed, would be able to relocate to South Warrington. The justification for the release of land from the Green Belt is weak and based on unsubstantiated levels of growth. This approach cannot be considered to be sustainable in the context of the Framework.

5.5 In contrast to the approach to development plans in other locations, the predicted levels of growth in the case of Warrington are almost entirely based on the impact of development envisaged in the plan as the key driver. There is little or no conclusive evidence as to how activity elsewhere in Cheshire will prompt growth at the levels predicted. The plan is based on aspiration rather than justified through a sound evidence base.

5.6 There are numerous examples and concerns as to this absence of evidence.

5.7 The Strategic Economic Plan was produced by the LEP in 2017. The Plan anticipated growth based on the impact of HS2 in Crewe, development of a science and technology base across East Cheshire, car and aerospace development in West Cheshire. With the exception of additional warehousing to support an already dominant logistics base for the Warrington economy, there was no such catalyst for growth in Warrington other than its self imposed aspiration to secure "city" status, as set out in the PDO.

5.8 The period since the inception of the SEP has been dynamic. The vote to leave the European Union has clearly impacted on development decisions for businesses with strong European connections. Car manufacturing is controlled by Peugeot, aerospace by Airbus. Issues with cost and debate over benefits of HS2 phase 1 has brought into question to certainty and timing of delivery of HS2 phase 2. The scale of population and household growth and increase in the number of jobs envisaged by the SEP must be questioned and so therefore must the needs assessment based on the aspirations of the SEP and historic trends which were achieved in an entirely different economic environment.

5.9 The recent announcement by Scottish and Southern Electricity (SSE) of the immediate closure of Fiddlers Ferry Power Station, needs to be taken into account. The site should now be considered as providing additional capacity for development within the Plan period and assessed in the context of alternative to the Green Belt release currently proposed.

Key Challenges as to Soundness

Growth levels are based on the unsubstantiated ambitions of the Strategic Economic Plan of the LEP and Warrington Means Business. The ambitions are dated and fail to recognise later economic trends.

Growth levels are unrealistic and undeliverable based largely on an unpredictable and transient logistics market.

There are contradictory assessments as to the expectations of growth especially at the point of production of the Preferred Developments Option. The 18 month period between the PDO consultation and the Submission Draft has seen the need for considerable modification in previously predicted levels of growth, with limited alteration to the scale of development proposed.

There is less certainty of the advent of the later phases of HS2 and no realistic expectation that Northern Powerhouse Rail will reach Warrington within the plan period.

There is no track record of the delivery of growth at the continuous and high levels predicted.

The Council should be challenged to demonstrate, how untested aspirational expectations for population, household and employment growth can be measured against historic trends and how those patterns of growth are distorted simply as a consequence of higher levels of land availability.

6 Housing Supply

- 6.1 Given the clear and obvious weaknesses in assertions by the Borough Council over predicted levels of growth, it would seem unrealistic to seek to achieve the averaged delivery of 945 dwellings per annum as envisaged in the submission draft.
- 6.2 There is considerable local concern and confusion at how the housing figures have been arrived at and how they are interpreted as justification for the wholesale release of land from the Green Belt.
- 6.3 The Framework para 60, requires the determination of the minimum number of homes needed to be informed by a housing needs assessment.
- 6.4 Housing need is defined as an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure, and preparing policies to address this such as site allocations.

6.5 The Warrington Local Needs Assessment (WLNA) was published in March 2019. It is worthy of comment that the WLNA, as with other background documents was produced at the same time as the Submission Draft. It raises suspicion and concern in the eyes of the community as to whether the Submission Draft has properly considered valid evidence or whether evidence has been presented in a form which supports objectives set by the Council.

6.6 The WNLA at the outset, by quoting para 10 of the Planning Practice Guidance, seeks to establish justification for housing need based on aspirational growth rather than a realistic projection of historic trends. The WLNA continues to set the aspiration of the dated and unrealistic provisions of the Strategic Economic Plan.

6.7 The baseline figure for Warrington based on 2014 household growth figures establishes a figure line of 792 houses per annum. Application of an affordability ratio of 6.36 provides a resulting figure of 909. This approach oversimplifies assessment of housing need in Warrington. No recognition is given to the distortion of high value housing across south Warrington. This housing in South Warrington supplies a different market to that provided by the urban core, newer development in North West Warrington and the northern villages. The housing needs for the borough are different across the area. They reflect proximity to sources of employment, travel to work modes, mobility of potential occupiers and a range of socio-economic and demographic issues which cannot be accurately appraised through a purely arithmetical process.

6.8 It is worthy of note in this regard that the population growth anticipated for Warrington is high compared with most of its neighbours – Trafford being an exception. The 2016 ONS for population growth projections between 2017 and

2040 suggest an increase in population for Warrington of 7.7%; compared with Halton at 1.6%; St Helens at 3.9%; and Wigan at 2.5%. This is relative to a national average of 10.6%. There would be logic in a wider spread of population growth at a sub-regional and regional level. It is clear from travel to work patterns that Warrington is a source of employment for large numbers living outside the Borough. Often this employment is based on lower paid areas of employment outside the high earning professional and managerial sector. Information produced by those presenting development proposals within the logistics sector suggests that up to 60% of their workforce lives outside Warrington. Logic would suggest that predicted population growth is not necessarily aligned with sources of predicted employment growth. Building of new housing in South Warrington will not be able to guarantee the delivery of the scale or affordability of housing which would change this unsustainable pattern of development. Increased growth in neighbouring boroughs would be of greater benefit in terms of regeneration, economic development and sustainable transport patterns, than an approach which takes an ill-considered option, responding only to the expectations of landowner and developers. The approach adopted by Warrington is inwardly focused and does not take account of the sub regional and regional position.

6.9 The plan figure of 945 is based on the speculative position adopted in the SEP.

The LHNA and the EDNA seek to justify this position on the basis of a high level of economic growth stimulating demand for new housing

6.10 The SWP would question the validity of this approach on a number of grounds.

- 6.11 The LHNA acknowledges the complexity of marrying economic growth with population growth. Whilst utilising a range of sophisticated assessment tools, the LHNA demonstrates an absence of key drivers affecting economic growth and population growth in Warrington and the surrounding region.
- 6.12 It is accepted the Framework and related advice requires consideration of the 2014 household formation rates, the potentially more realistic 2016 rates are dismissed because of the lesser period of assessment used to calculate rates. It is perhaps inconvenient that they would also suggest a lower rate of household formation and a less robust justification above the 909 dpa calculated.
- 6.13 As noted elsewhere in this report the level of economic growth is not based on tangible evidence based on the impact of new large scale development, new infrastructure or specific activity which is of sufficient scale to generate increased activity supporting inward migration and growth generation.
- 6.14 If there is a driver of this kind it is suggested by the Council that this will be based on new development based around logistics. Such development is highly dependent on locations in key positions to the strategic motorway and highway network. Given Warrington's location on the M6, M62 and M56, it is naturally attractive to such uses, but in an increasingly competitive market, where neighbouring authorities are also presenting the scope to accommodate logistics based development. It would almost certainly be possible to secure development alongside much of the motorway network across Warrington, particularly at any of the seven motorway junctions, but that is only justified on the basis of a Warrington's corporate agenda driven by growth at the cost of all other considerations.

6.15 The Council's 2018 Strategic Housing Land Availability Assessment includes at table 2.4 and elsewhere figures for the total number of gross completions from 2007/8 to 2017/18. Over that 11 year period a total of 5676 homes were completed, an average of 516 dwellings per annum. This represents a historic level of delivery which is only 55% of the average delivery anticipated by the Submission Draft.

6.16 There is no clarity in the EDNA or the LHNA which justifies this uplift in demand. Growth appears entirely dependent on the economic impact and job creation of 4 million sq ft plus of modern logistics warehousing.

6.17 The HCA Employment Development Guide 2015 significantly suggests that there is a downward pressure on employment density in buildings serving the distribution sector, although it is acknowledged that some additional highly skilled roles will emerge with specialist maintenance and programming of automated equipment. Development for such uses will generate half the employment density produced by B1 or B2 uses.

6.18 The seasonal nature of retail related distribution necessitates short-term and zero hours contracts.

6.19 The LHNA dismisses alternative growth forecasts previously predicted by Oxford Economics and Cambridge Economics, preferring appraisal which more closely reflects the aspirations of the SEP without clear justification, and without consideration of the volatility and unpredictable nature of market conditions.

6.20 Appraisal of population growth and housing need fails to reflect the disconnect between the place of residence of potential employees and the suggested locations for economic development. The Plan assumes that it can bring about a

sea change in Warrington's demographic profile by delivering affordable housing in locations where traditionally the market has driven the highest values across the Borough. Given low levels of unemployment in Warrington, that growth will drive population growth and inward migration with consequent stimulation of the local economy. The plan presumes that new infrastructure can be delivered within the Plan period so as to viably connect areas of higher unemployment with areas allocated for new commercial development.

6.21 The form and scale of growth anticipated appears to disregard historic relationships with neighbouring areas and travel to work patterns. South Warrington has become attractive as a place to live as an alternative to more expensive suburbs of South Manchester. More rural surroundings but with ease of access to the motorway network, as well as cost, has influenced this pattern. Unless congestion reduces on the motorway network or public transport connections dramatically improve, the basis for high levels of demand for housing in South Warrington will diminish.

6.22 Understanding of the patterns of demand and supply of housing across Warrington is critical to provide context to the application of household growth and population forecasts and to assess historic patterns which influence trajectories for historic and future development.

6.23 New Town Designation has been a major influence creating a supply of housing land beyond a scale which would be reasonable developed. The availability and advent of the Chapelford development on the former RAF Burtonwood base created supply which exceeded demand and resulted in development extending beyond the expected period for completion. The decision to release land on the

previous employment allocation of the Omega development has influenced the ability to deliver high levels of supply. During the 1990's the Council was unable to demonstrate adequate levels of supply against requirements which were then applicable, resulting in development on Green Belt and Open Countryside which had previously been resisted. It is evident that developers were attracted to high value development of green field sites in areas such as Lymm. Notwithstanding provision for affordable housing, these developments provide ample demonstration of how such development has not made any realistic contribution to the availability of truly affordable accommodation in appropriate locations and critically, such development has demonstrated the limited impact of such development on regeneration at the heart of the urban area. Government Directives in the 1990s and 2000's prompted developers to reassess their approach to development. The demise of traditional industry in Warrington created the opportunity to reassess the viability of former tannery, wire works and similar sites within central Warrington. This resulted in a peak of development in the mid 2000's with higher density development including apartments distorting the supply position across this period to a point that the Council introduced a moratorium on new housing developments.

6.24 Evidence from the completion and release of new properties from developers on the ground, suggests that there are currently no commercial drivers in South Warrington to develop at the rates necessary to produce the levels of development anticipated by the Submission Draft.

6.25 The scale of infrastructure required to service new development in South Warrington requires a large amount of high value development in order to facilitate development contributions to infrastructure delivery.

Keys Challenges as to Soundness

The scale of housing development proposed needs to be sense checked and reassessed. There is little evidence to suggest that development at the rate suggested has ever been achieved – there must be a “sense checking” exercise to assess the realism of achieving the levels of housing need and the ability to deliver that need.

Application of the affordability ratio in Warrington represents a distortion of the true levels of need. Figures produced need to be assessed against the particular characteristics of the local housing market.

There is a disconnect between the scale of housing development expected and the relationship with employment sectors which are expected to support that growth.

Historic housing completion rates suggest the level of house building in Warrington since 2007/8 has on average reached only 55% of the level anticipated in the Submission Draft.

In order to properly understand the housing market in Warrington it is necessary to consider the town's history and development across the last 4 decades, together with changes in the town's employment base and the impact of changes in legislation and guidance.

Control over the rate of delivery will not be determined by the Council. Developers and their approach to the economics of the housing market will dictate the rate of completion. On that basis the economic basis for development to fund infrastructure is unreliable and unsound.

The availability of green field sites in the Green Belt is a disincentive for developers to pursue, more complex and costly development of previously developed sites in the urban area.

A 15 year plan, rather than the 20 year plan tabled, with the focus of development on the use of existing urban capacity will prevent the premature release of Green Belt prior to full and complete realisation of the potential of brown field sites. This approach would also enable resolution of the Fiddler's Ferry and Warrington Hospital site issues prior to excessive release of Green Belt.

Density figures in the plan require a "sense check" There has been no discussion with community representatives prior to the release of the Submission Draft relating to the approach to density. Low densities in the SWUE and Garden

Suburb require more in depth analysis as does the ability to secure higher densities in the urban area.

7.1 The largest single employment land allocation within the submission draft is within Appleton Parish but immediately abuts and impacts heavily on Grappenhall and Thelwall. The SWP contends that logistics based employment development in South Warrington is unnecessary and would fail to deliver the stated economic and social benefits claimed and necessary to justify release of land from the Green Belt.

7.2 The preceding analysis of housing supply has considered the overstated levels of growth, stemming from an aspirational but unrealistic position adopted in the SEP.

7.3 It is not disputed that geographically, the strategic position of Warrington makes the area an attractive location for logistics development, but the principal purpose of the plan should be to manage this growth against a background of the wider public interest and other material planning considerations. The fact that even at this stage of the local plan process, applications for planning permission are in place for the majority of the employment allocation proposed for South Warrington is a demonstration of how demand for development should be managed and not sanctioned purely on the basis that it will result in growth.

7.4 Should the employment land at Appleton Thorn come to be allocated through this plan process it would seem likely to come forward early in the plan period, prior to any infrastructure improvements, particularly connectivity to appropriate sources of labour and the wider highway network required to effectively accommodate large scale additional freight movements.

7.5 The area in South Warrington selected for development appears to be based on three main considerations

- Proximity to junction 20 of the M6
- Ability to accommodate the requirements of existing businesses
- Ownership and control of the allocated site.

7.6 This is considered by the Borough Council to outweigh presumptions against the release of Green Belt land, even where its own advisors suggest that Green Belt objectives and purposes are strongly met. Ecological and landscape appraisal is weak and understated in order to weigh in favour of economic arguments. The development proposed subsumes the village of Appleton Thorn which will lose much, if not all of its identity as a distinct settlement.

7.7 Planning application 2017/31757 submitted by Eddie Stobart Ltd and others for land within the proposed allocation provides illustration of the absence of a clear economic justification for development of a Green Belt site. Submissions made with that application demonstrated how the majority of staff employed at Stobart's existing premises reside outside the Borough. Those residing within the Borough typically live north of the Manchester Ship Canal and rely on the private car for transportation to and from the site. Theoretical assessment of spend and impact on GVA do not accurately reflect this position.

7.8 The submission of a further application on the remaining part of the land identified as a proposed allocation, validates the seemingly unlimited attraction of Warrington as a location for logistics development but should not be seen as a reason for large scale release of Green Belt based on dubious consideration of

issues of sustainability or economic benefit. This is further reinforced by known developer interest in sites on the eastern side of the M6 junction 20.

7.9 The SWP has noted with interest the comments of Halton Borough Council in respect of the justification for Green Belt release relating to development of Warrington Waterfront and Port Warrington.

7.10 The objections raised to the PDO continue to apply to the Submission Draft. They focus on the scale and form of the Port Warrington development and its impact on the Green Belt particularly in terms of the closure of gaps between the settlements of Warrington and Runcorn, contrary to the NPPF. [Halton BC report of the Strategic Director – Enterprise, Community and Resource to the Executive Board – Response to Warrington Local Consultation – 14 December 2017]

7.11 The SWP shares the concern that the need for port facilities in this location is unjustified and insufficient to merit the release of land from the Green Belt. The original concept for Port Warrington was dependant on the potential for the Port to act as a transshipment point to move goods from one mode to another – principally ship to rail. Development has been viewed as having potential value on the basis of reinstatement of a direct rail link to the West Coast Mainline. This remains unrealised despite the designation of the site in the Warrington Core Strategy Local Plan 2014.

7.12 Policy MD1 of the Submission Draft lacks clarity and certainty over delivery. It appears to rely on the delivery of the proposed Western Link Road, rather than any clear commitment to deliver the rail link and to create a sustainable intermodal facility.

7.13 It would appear that the questionable aspiration to provide the Western Link as a means of managing congestion at the Bridgefoot Junctions has prompted the need to encourage development capable of funding the proposed highway infrastructure. The financial case of the Western Link submitted to the DfT notes the prudential borrowing by the Council would be underpinned by New Homes Bonus, NNDR and developer contributions secured through the release of land for development in the Green Belt within the Warrington Waterfront and the SWUE.

7.14 The SWP's objection to this approach extends to concern that the Western Link Road decants traffic from the employment allocation onto the highway network within Walton onto the A56 corridor, linking to the Daresbury Expressway into Runcorn and to junction 11 of the M56. This would be the principal route for goods traffic leaving the motorway network to access Port Warrington. The Western Link only serves a limited part of access to the Waterfront otherwise depending entirely on an already congested local highway network. (See also comments on Infrastructure)

Key challenges as to Soundness

Previous development plans since the 1980's have accepted that Green Belt in South Warrington serves the purposes and functions of the Green Belt. The basis to now alter this position is not sound.

The level of benefit – economic or otherwise which accrues from the release of Green Belt does not provide for the exceptional circumstances required by the NPPF Para 137

The release of Green Belt for development at the scale proposed is not justified.

The location of development in semi-rural parts of the Green Belt flies in the face of the aspiration of the LTP seeking development in sustainable locations.

8.1 Paragraph 136 of the NPPF notes

"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they endure beyond the plan period. Where a need for changes to the Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies including neighbourhood plans".

8.2 The Submission Draft draws heavily on Green Belt assessment carried out by ARUP. The assessment notes at length an approach and justification for review of the Green Belt on the basis of housing need, whilst stating that its purpose is to appraise the effectiveness of the Green Belt against current policy objectives and acknowledge Green Belt functions. To some readers this may create a justifiable concern that appraisal sets out to justify the Council's expectations rather than providing an unbiased assessment of the Green Belt in Warrington irrespective of consequences for subsequent policy review.

- The general rationale for a highly methodological approach is understood, but it is worthy of note that throughout the assessment there is consistent reference to the need for the application of professional judgement. It is considered that the approach adopted displays a number of flaws. It is over

simplistic to parcel and section the Green Belt in the manner utilised by the assessment. Warrington's Green Belt largely functions as a single entity. With few exceptions the parcels serve the purposes of the Green Belt in conjunction with one another, not as a single area of function.

- It is necessary to understand the South Warrington Green Belt in terms of the function purposes served by that area of Green Belt. The approach adopted in the assessment breaks the Green Belt into small parcels and would enable a conclusion that development should be allowed to continue up to any point where a durable boundary with the Green Belt can be established.
- The approach assumes that sprawl can only relate to the main settlement boundary. This approach is flawed. If that approach applied there would often be little purpose in insetting settlement in the Green Belt. The definition of sprawl implies that it is possible that planned and managed growth cannot represent sprawl. The assessment fails to appreciate the extent and nature of the historic growth of Warrington resulting in existing sprawl which should be contained.
- The ARUP appraisal accepts that consideration should be given to the heritage value of the town centre and Lymm conservation areas. Consistency should require application of the same approach to conservation area designation in Thelwall, Grappenhall, Stockton Heath, Walton and Moore. The historic value of all these conservation areas is heavily dependent on setting provided by the Green Belt.

8.3 It is concluded that whilst the assessment provides a useful discussion tool, it is weak in providing evidence of sufficient clarity and certainty so as to properly

assist and to justify the tests for excluding parts of the Green Belt from continued protection.

8.4 It is considered that an alternative approach to assessment of the value of Green Belt would continue to be based on the five purposes of the Green Belt but to review these against the key issues and development pressures which impact on the current function of the Green Belt.

8.5 It is clear that North Warrington derives value from the Green Belt in terms of prevention of merger with adjoining settlements. Unfettered growth of Warrington would need to be managed to prevent merger with East Widnes, St Helens, and Parkside, within Halton and St Helens. The expansion of Omega. Burtonwood and Winwick could however be increased without conflict with this purpose of the Green Belt.

8.6 A similar issue would apply to the expansion of Croft and Culcheth and Glazebrook in the North East of the Borough. Managed growth of these settlements, beyond that which is currently proposed, does not conflict with the objectives of Green Belt Policy, yet the majority of these areas are discounted on the basis of a Green Belt appraisal which encourages disproportionate weight to be given to the issue of merger of settlements and a consequent discounting of these area as potential locations for development.

8.7 It is worthy of note that with the exception of Winwick, none of these settlements north of the town have designated heritage value which Green Belt designation might justifiably be designed to protect. This approach contrasts that in South Warrington, where an abundance of heritage assets are ignored.

8.8 As a reflection of its New Town Status, the urban area of Warrington expanded rapidly, expanding out into its previous rural hinterland in all directions. Expansion and development was based in part on short trips to neighbourhood centres but otherwise total reliance on car based transportation. Urban form, highway infrastructure, landscape and settlement patterns were all based on use of the private car. A series of largely unconnected neighbourhoods was created, often largely self contained and unrelated to the town centre. Residents of these areas were as likely to utilise shopping and recreational facilities in Merseyside and Gtr Manchester as in Warrington Town Centre. Employment relied as much on inward migration from neighbouring settlements as on the indigenous workforce. The town centre under performed in terms of expected retail function for a town with a 200k plus population. The ARUP report notes the lack of positive impact of New Town related development on the inner areas of Warrington. Problems were compounded as the New Town designation left parcels of land undeveloped and in some cases an absence of clarity over planning status as various government organisations assumed some but not always all, of the powers originally sitting with the Development Corporation and Commission for the New Towns. Even more significantly, key elements of infrastructure envisaged as essential elements of the New Town Master Plan were not delivered.

8.9 A legacy of neighbourhoods dependant on car use, unconnected with each other or the town centre, not surprisingly resulted in a complete *volte face* in the 1990's as the focus of the Borough Local Plan, then the UDP and finally the 2014 Local Plan Core Strategy sought to apply policy, including Green Belt policy, which supported regeneration and the focus of growth within the inner urban areas.

Some success was achieved as development addressed derelict and redundant sites within the urban area – to some extent reflecting Government Policy in the mid 2000's and directives enabling resistance to Greenfield development.

8.10 Warrington's Green Belt has to be seen in context. It does not exist in isolation but functions alongside and with the Green Belts of North Cheshire, Gtr Manchester and Liverpool. Changes to the Green Belt in Warrington are highly likely to be influential on the policies of the two adjoining city regions and the individual authorities within. The approaches of New Town driven policy of the 1970s and 80's has changed dramatically. Rather than seeking to create new economic opportunities and better housing outside the cities, Warrington's neighbours have seen massive change in the economic function and environmental regeneration of city centre and inner city areas. This must impact on development in Warrington which is ultimately reflected in the role of Warrington's Green Belt.

8.11 The detail of the Green Belt appraisal submitted within the evidence base presented with the Submission Draft, attracts criticism notwithstanding any subsequent consideration of any justification for its release.

8.12 The proposed scale of Green Belt release creates a number of tensions with the function and purpose of the Green Belt.

8.13 Each of the Parish Councils will comment on the specific aspects of Green Belt release which impact on individual communities. In general terms it is considered that the assessment of the current contribution of designated Green Belt in South Warrington is understated.

8.14 The importance of the Green Belt in the Walton area is recognised in terms of the risk of merger with Moore and developed areas Runcorn within Halton. It is noted that Halton BC raised objection to the 2017 PDO on this basis. It would seem counterintuitive for the submission draft to remove large parts of this area from the Green Belt.

8.15 The selective assessment of which historic areas should be considered in the context of Green Belt purpose is apparent in the case of Grappenhall and Thelwall and Walton. The assessment ignores the setting of some of the most historic parts of the Borough which would be significantly altered as a result of encroachment of development and a change to the semi- rural setting of Grappenhall and Walton villages.

8.16 The assessment ignores the impact of the Bridgewater Canal corridor as a sound and logical boundary to the urban area on the south side of Warrington. The release of the land to the south of the Canal would represent encroachment into the open countryside and the merger of pockets of development with long established, historic settlements. Previous local plans and the submission draft all make reference to the key characteristic of Warrington as an urban core, with distinct settlements surrounding the town and set in attractive rural surroundings. The release of land to the proposed Garden Suburb would undermine this principle to the considerable detriment to the character and appearance of the area.

8.17 No account is taken of the importance of the topography of the area proposed to be occupied by the Garden Suburb. The land steadily slopes downwards to the north by 50m. This has two critical impacts. Firstly, views from

the Bridgewater Canal look south up the slope with tree lines and existing development at Grappenhall Heyes providing ample illustration of the impact of a developed area occupying this space. This would affect the openness of the Green Belt when viewed from Knutsford Road, Australia Lane, Broad Lane and Lumb Brook Road in particular. Secondly, views south to the Parish Church and the historic core of Warrington from Wrights Green, Broad Lane and Knutsford Road would be altered. The setting of the historic cores of Walton and of Grappenhall Village would be changed to the considerable detriment of the locality. The Green Belt function of protecting the setting of historic settlements is eroded.

8.18 The Garden Suburb removes the separation of Grappenhall from Appleton Thorn and Grappenhall Heyes. Grappenhall Heyes would no longer be separated from Stockton Heath and Appleton. Stretton would be subsumed into development north of Appleton. As the result of the SWUE, Walton Village would no longer be separated from Lower Walton and Stockton Heath and would become part of the urban sprawl.

Key Challenges as to Soundness

There is no clear and proven evidence to justify the scale and form of Green Belt release proposed. The Submission Draft fails to adequately consider the requirements of the NPPF in suggesting such levels of release.

The assessment of current areas of Green Belt is weak and in places erroneous. Although purporting to provide for a methodical and analytical approach to assessing the value of land against the 5 purposes of the Green Belt the approach still relies on judgement, which in a number of cases can be contested.

There are instances with the proposed SWUE and the Garden Suburb where Green Belt which has been identified as performing strongly against the purposes of Green Belt is shown to be released and made available for development. Other areas which are noted as performing less strongly are retained in the Green Belt.

The scale and location of Green Belt release undermines the wider objectives of the Plan. The release of relatively easy to develop land will impact on the take up and development of more difficult urban sites. Release of Green Belt will directly conflict with the purpose of the Green Belt to promote and support urban regeneration.

The physical and functional disconnect between the south of Warrington and the town centre will be exacerbated by the paucity of transport connections. Notwithstanding the scale of development proposed, economic benefit will not accrue to the town centre as a product of, or as justification for the release of the Green Belt.

The extended plan period is used to justify the release of more Green Belt than is necessary. In so doing the end view of the Plan fails to properly account for the

potential release of additional previously developed urban sites which would be able to support land availability for housing and employment in locations where social and economic benefit would accrue to a greater extent.

The ARUP assessment fails to fully consider the purpose of the Green Belt in protecting the setting of historic settlements.

9.1 Warrington is unique. Whilst settlements were initially focused on a crossing point of the Mersey in Latchford, the later industrial town development on the northern side of the River. Development on the south of the side of the Mersey increased as the 18th Century Bridgewater Canal and the late 19th Century Manchester Ship Canal partitioned the area. Crossings reflective of demand at the time and using contemporary technology were placed across the two canals. This leaves a legacy of humped backed bridges and underpasses across the Bridgewater; three swing bridges and a fixed high level bridge across the MSC. The Manchester Ship Canal Company (Peel Holdings) has absolute and legal control over the Ship Canal bridges. The position established in 1890 remains unaltered in 2019.

9.2 This situation has been influential in the scale and form of development which has taken place in South Warrington. The New Town could not deliver the necessary infrastructure in order for development in South Warrington to evolve in the same way as North Warrington.

9.3 The Submission Draft largely ignores the lack of connectivity between the two parts of the town and its centre. It continues to depend on Victorian structures and to assume that the swing bridges will never swing or require maintenance. A hot summer will bring the challenges of expansion and the inability to close a bridge once opened.

9.4 The population of South Warrington is consequently tempted to look elsewhere to work, shop and spend leisure time. (Taxi firms specifically caution customers

on their inability to guarantee transport to Warrington's town centre stations to meet specifically timed train when travelling from South of the Ship Canal.

9.5 The scale and form of the development proposed in South Warrington – particularly that focused on the Garden Suburb and the SW Urban Extension is acknowledged resulting in increased trips by all transport modes. [Submission Draft 7.2.1] There is clear acceptance of additional pressures on a failing network including highway infrastructure.

9.6 In highlighting concern over infrastructure the SWP is aware of the representations to the Plan and to the proposed Local Transport Plan, LTP4 which highlight in greater depth concerns over the approach to transport infrastructure.

Transport Infrastructure - Road

9.7 The Submission Draft and related evidence base, the emerging Local Transport Plan (LTP4) paint a picture of the existing highway network across Warrington. Network development is constrained by the three watercourses which cross the Borough from east to west – the River Mersey, the Manchester Ship Canal and the Bridgewater Canal. The crossing points of these barriers are critical to the function of the highway network.

9.8 The Submission Draft relies upon the Warrington Multi Modal Transport Model 2016 as its base for assessment of the impacts of and the mitigation, for the scale of new development proposed. An AECOM report within the evidence base, notes that the development allocations would impose a significant pressure on the transport network.

9.9 It is considered that there are a number of issues raised by the Transport Model which merit challenge.

- It is unclear how the model takes account of a dynamic highway network which is constantly interrupted by other events. There is no consideration that the network will almost certainly be constrained by roadworks or other obstructions to traffic flows or impacted by regular closures and problems on the adjacent motorway network.
- There is no reference to the tolled Mersey Gateway Crossing.
- There is no clarity as to how cycling is modelled.
- There is no clarity as to how the model accounts for bus services delayed by bridge openings or the impact of School Buses.
- There is no reference to the significance of Newton-le-Willows station which is now served by TransPennine Express rather than Warrington Central. Survey work predated the transfer of TransPennine services and changes to the timetable in 2018
- The model uses an average weekday in June and 2016 as its base for data appraisal. It is suggested that June may not be a typical month, as it is the start of the holiday period and may not reflect different modal choice and travel patterns in winter months.
- Critically the model assumes that the three swing bridges across the Manchester Ship Canal are always open to road traffic when in reality these bridges can swing several times a day, with delays of 12-14 minutes, with consequent effects lasting for up to an hour. This impacts on each of the three crossings in turn. Warrington is unique in its location at the crossing point of three significant waterways. This is not reflected in the Submission Draft. The Plan presents no data on the impact of the swing

bridges on the highway network; no data on historic, current or future patterns of use of the Ship Canal.

- The Plan and evidence base demonstrate little apparent knowledge or awareness of the extent of proposed use of the Ship Canal. This includes the number of vessels and means of operation at Port Warrington. At present a conventional vessel berthing at Port Warrington could not turn in the Canal. It would seem unlikely that reversing to Runcorn would be an option so any vessel using the canal, would have to pass through the 3 town centre canal crossings, pass through Latchford Locks, turn at Irlam and return west, again passing through the swing bridges. There is no apparent knowledge of consideration of this issue within the Council or the Plan.
- The nature of the development of the Canal means that the operator has a legal right to move vessels through the crossings. The Council has no legal means of control over the timing and frequency of bridge openings.
- The Plan takes no account of the impact of development at Irlam, Carrington or Salford in terms of Canal usage.
- Frequency of bus services other than for Stockton Heath Village are overstated and no account is taken of future real term fare increases.

9.10 The Submission Draft recognises the need to address shortfalls in highway infrastructure provision, improve connectivity and network efficiency to support economic growth, whilst reducing the need to travel in the private car, improve safety, tackle air quality, encourage active lifestyles and supporting

transformational change in transport networks and services (Submission Draft – March 2019 Para 7.1.3)

9.11 In reality the Plan fails to deliver any tangible way of delivering these objectives other than relieving congestion in a few locations whilst letting it grow elsewhere.

9.12 The Submission Draft considers that development will meet the twin aims of accessibility and sustainability (in transportation terms). Development in South Warrington will not achieve either. The SW Urban Extension and Garden Suburb are isolated from key facilities and likely sources of employment. There are no improvements to key linkages to the town centre which might even loosely be considered to support regeneration objectives.

9.13 A key theme to the Submission Draft (and LTP4) is to secure modal shift. This underpins ambitions to ensure sustainable development, improvements in air quality and lifestyle but the plan provides no tangible means of delivering this ambition. The absence of any plans to deal with public transport priority at key points of congestion, Stockton Heath Village, Stockton Heath and Latchford Swing bridges, Latchford Village, Grappenhall Road, Lumb Brook Bridge, Wilderspool Causeway results in a failure to demonstrate how public transport, cycling etc can be provided and secured on already congested and heavily trafficked routes

9.14 There is an assumption that the proposed Western Link Road will alleviate problems in the Walton area and particularly on the A56 and Chester Road Swing Bridge. The actual benefit of the Western Link is questioned elsewhere in this submission, casting doubt over the reality of the Link to provide the level of

connectivity between locations which results in the expected shift in routing and consequent lessening of congestion.

9.15 The Plan similarly suggests that the new, large scale developments in South Warrington must ensure that traffic generation has no adverse impact on the local community. [Submission Draft Policy INF1]

9.16 In reality, and assuming the objectives for growth and town centre regeneration can be secured, traffic from the SW Urban Extension, Garden Suburb and Lymm, together with the Warrington Waterfront development will need to pass over the unimproved highway network of south of Warrington Town Centre.

9.17 Traffic from the South East, including the route in from junction 20 of the M6, will continue to utilise the A56 and A50, crossing Latchford Swing Bridge and through the gyratory system in Latchford Village. Traffic routing to the northern side of the town centre or to reach areas in North Warrington, including Omega, will navigate Kingsway South and North, Farrell Street and the already congested Padgate Lane.

9.18 Traffic from the Garden Suburb will only be able to enter the wider highway network via the single carriageway Lumb Brook Bridge and the congested junction with Chester Road and Grappenhall Road, or alternatively via Witherin Avenue onto Lyons Lane and the A49, to then use routes through Stockton Heath or via Latchford High Level Bridge.

9.19 The Local Highway Authority has presented the proposed Western Link as an alternative route into the town centre or for traffic to reach Omega and employment areas west of the town. Should this be the case the Link would draw traffic through Stockton Heath and Walton from the proposed new developments.

9.20 The Western Link would also provide access to residential and employment related uses on the Warrington Waterfront and employment areas based around Port Warrington. The main route into this area would be via the proposed Western Link and thence onto the A56 at Walton from where access can be gained to junction 11 of the M56. New streams of commercial traffic would be drawn on the already congested A56.

9.21 In each case the impact of developments proposed for South Warrington will have a clear, significant and adverse impact on existing communities in the area, including some areas which experience the higher levels of deprivation in the Borough. Development proposals would load additional traffic onto parts of the highway network where Air Quality is an issue and routes already designated as AQMAs.

9.22 The Submission Draft notes that it will be a requirement that trips generated by development can be adequately accommodated by Warrington's transport network. Clearly this is the correct approach but the policy fails any attempt to define "adequate". It could be argued that the existing trip base is not adequately served. Traffic flows at key points on the network are severely constrained. For example-

- A49 Winwick Road
- A57 Sankey Way
- A49 Stockton Heath
- A49 Wilderspool
- Chester Road
- A50 Grappenhall

- A56 Walton
- A49/A5061 Warrington Town Centre
- A50 Padgate

9.23 Congestion and delays at these points today, already provides demonstration of the need for major improvements to infrastructure provision prior to any additional development taking place. This does not mean localised improvement but improvements which address wider impacts across the whole network, including the provision of a deliverable and workable new crossing of the Manchester Ship Canal.

9.24 A major barrier to this approach is the means of funding. The business case for the Western Link demonstrates that it is the development proposed which creates potential funding for infrastructure improvements. In that case prudential borrowing by the Council will ultimately be supported through business rates, New Homes Bonus and CIL/S106. This is not a sustainable approach given uncertainties over costs, uncertainty over the pace of development and the planning process for the delivery of infrastructure.

9.25 The River Mersey is crossed at 5 points within the Borough although two provide general routes – from west to east

- Gateworth (a dedicated crossing to Arpley Waste Disposal Site)
- Centre Park (a dedicated crossing to the Centre Park business park)
- Bridgefoot (crossing of the A49 and A5061 in Warrington Town centre)
- Kingsway Bridge (crossing of the A50 in East Warrington)
- Thelwall Viaduct (M6)

9.26 The Manchester Ship Canal is crossed at 5 points, although Moore Swing Bridge provides access to a limited area.

- Moore Swing Bridge (partly in Halton)
- Chester Road Swing Bridge (A56) (note this bridge has a narrower carriageway than others, with HGVs unable to pass on the bridge and a single footpath.
- Stockton Heath Swing Bridge (A49)
- Latchford High Level Bridge
- Latchford Swing Bridge (A50)
- Thelwall Viaduct (M6)

With the exception of the Thelwall Viaduct – all of the Ship Canal crossings in Warrington are the original Victorian structures which although skilfully and robustly constructed, are well into their second century of operation.

9.27 The Bridgewater Canal is crossed by main roads at:

- Walton (A56 Chester Road)
- Stockton Heath (A49 London Road)
- Grappenhall (A50 Knutsford Road)
- Thelwall Viaduct (M56)
- Lymm (A56 Booths Hill Lane)

9.28 The Bridgewater Canal is also crossed at various points through routes using original 18th century canal infrastructure:

- Acton Grange Bridge
- Warrington Road (Walton)
- Hough Lane (Walton)

- Red Lane (Stockton Heath)
- Lumb Brook Bridge (Stockton Heath)
- Stanny Lunt Bridge (Grappenhall)
- Church Lane Bridge (Grappenhall)
- Knutsford Road/Weaste Lane (Grappenhall)
- Bell Lane (Thelwall)
- Star Lane (Lymm)
- Whitbarrow Road (Lymm)
- Lymm Bridge (Lymm)
- Oughtrington Lane (Oughtrington)
- Burford Lane (Heatley)

9.29 Proposals to develop land for 9000 houses and to allocate 116ha of land for employment purposes show limited realistic appraisal of the ability of the existing highway network to accommodate this scale of development.

9.30 The Submission Draft shows only one additional crossing of the Manchester Ship Canal and two crossings of the Mersey (including the committed Chester Road Crossing to serve Centre Park) and no additional crossings of the Bridgewater Canal.

9.31 The proposed Western Link is poorly located, being too far west to merit use by the majority of South Warrington based residents or businesses.

9.32 The largest single allocation of the Submission Draft – the Garden Suburb - would be linked to the existing highway network by three already congested main roads. The A49, the A56 and the A50. Principal points of access to these routes

would rely on bridges and a single carriage tunnel to cross the Bridgewater Canal, each constructed in the 18th Century

Transport Infrastructure - Rail

9.33 The Plan aspires to encourage and support the use of multi-modal freight transport facilities. The majority of employment allocations in the plan relate to logistics based developments. Currently no logistics site in the Borough has rail access and all rely entirely on road freight. With the exception of Port Warrington, the largest sites have no possibility of connection to the rail network.
[Submission Draft INF1]

9.34 It is worthy of note that the Council has objected to the rail connected Parkside Distribution Centre in St Helen's on the basis of impact on the Green Belt and the local highway network.

9.35 The Submission Draft is positive towards the provision of rail infrastructure and services and the provision of rail facilities. This is somewhat ironic as the Council has consistently raised issue over HS2. The Council has missed opportunities to make Warrington the hub of HS2 connections with Manchester and Liverpool and Transpennine routes and continues to raise issues with the Golborne link which effectively bypasses Warrington as part of the main route north to Glasgow and south to Birmingham and London.

9.36 Objection to the Golborne route is somewhat naive as it fails to understand the existing constraints of the West Coast Mainline from Acton Bridge to Haydock and the scope for improved local services and freight routing which HS2 is intended to facilitate.

9.37 The electrification of the Liverpool to Manchester via the Earlestown route was the harbinger of the removal of direct TransPennine routes via Warrington Central. This highly significant event has not been considered in the future significance of Warrington as a strategic transport hub, and consequent misplaced assumptions about this position as stimulation for growth.

9.38 It is curious as to why allocations for major development are located at the furthest points from rail connectivity. The return on investment in a new Warrington West railway station would be optimised with further development which would have easy access to the Manchester – Liverpool Cheshire Lines route, in North West Warrington. No consideration is given to the potential to increase the use of Padgate, Birchwood and Glazebrook Stations through related development in close proximity to these points of access to the rail network. The Rainhill route from Liverpool to Manchester provides access to North Warrington via Earlestown and Newton le Willows which is largely ignored in the Plan. Sections of this route lie within the Borough and could support new development through easy access to the rail network.

9.39 Much has been made of the high level of rail connectivity into Warrington, links to HS2 and the prospect of a Warrington stop on the Northern Powerhouse rail route between Liverpool and Manchester (HS3). The potential for such a link is included in justification for the high levels of growth predicted. There is no certainty that the link would be delivered within the plan period. Routing is unknown except possibly for that part of HS2 from Manchester Piccadilly to the Manchester Airport – Golborne Link junction. This would suggest a route passing to the south of Warrington before crossing the Mersey and extending west into

Liverpool. If this route connects into the West Coast Main Line at Warrington Bank Quay a line would have to cross parts of the South West Urban Extension and the Warrington Waterfront compromising current proposals and allocations.

9.40 Northern Powerhouse Rail documentation suggests that a link to Warrington might consist of a Warrington South Parkway Station presumably south of Walton Goods Yard sidings where it would provide for interchange with the WCML and the Chester and North Wales routes and also serve Daresbury Science Park. This would all take place in areas of Green Belt already under pressure through the allocations of the Submission Draft.

9.41 The Plan relies on transformational infrastructure provision including the development of mass transit systems and a shift away from the private car. The Plan fails to show any clear understanding of the complex interrelationships between development and infrastructure and misses the opportunity to properly plan for the implications of such development. The envisaged infrastructure, even if it were deliverable, only comes into place in the years following the end of the Plan period.

9.42 The proposals fail to demonstrate understanding of the employment and travel to work patterns in Warrington. They cater for a change in the role of the Town Centre which is not proven to be viable and unlikely to affect current patterns of travel to work in the city centres adjoining the Borough. The approach reaffirms concern that the Plan is an exercise in urban design rather than a holistically prepared plan which is sound when tested against the requirements of the Framework.

Community and Health Infrastructure

9.43 The Plan alludes to the provision of community and health infrastructure as key elements to sites allocated for development, but provides little or no substance as to the means by which such facilities will be delivered and then how ongoing viability will be secured.

9.44 The suggestion of proposals to relocate or redevelop the current Warrington Hospital site should be at the core of the Plan. This would establish a comprehensive and considered background to a town where such high levels of growth are proposed. There is limited evidence of the that the Submission Draft has been positively planned in this regard, it fails to meet the social objectives for achieving sustainable development, fails to show timely and effective engagement with infrastructure providers and is clearly contrary to the provisions of section 8 of the NPPF in this regard.

Key Challenges as to Soundness

The Plan sets as a key objective the ability of new development to contribute to the relief of existing issues with traffic congestion. The Plan not only fails to deliver against this objective but would result in additional traffic which would compound and exacerbate existing issues with congestion.

The ability to deliver the required infrastructure to properly serve the development allocations is doubted. There is insufficient certainty over the timely delivery of transport, education and health infrastructure. Routes and sites are ill

defined. The wider consenting processes needed are unclear and in many cases lie outside the Council's direct control

The Plan makes numerous assumptions and predictions about the impact of proposed rail infrastructure. There is no certainty or evidence to support the delivery of such provision within the Plan period. If certainty emerges, the Plan as presented would seem likely to conflict with many of the potential options for connection to HS2 and the location of Northern Powerhouse Rail.

10 Air Quality

10.1 There are a number of existing air quality management areas in Warrington.

These are based around the motorway corridors of the M6, M56 and the M62 and the A49 as it enters the town centre.

10.2 The proposals contained within the proposed development plan increase the risk of issues for air quality.

10.3 The Air Quality Management Study produced with the Plan notes that traffic levels are based on the Multi-modal Transport Model, the veracity of which is questioned above. If, as suspected, the model anticipates traffic flows which assume no closures of the Ship Canal swing bridges, it follows that the assessment of impact of development on air quality is similarly flawed.

10.4 There is no clarity as to how the seismic modal shift in transportation will transit from road based travel to work and freight movement. Employment allocations rely heavily on the logistics sector and road based transport onto an already highly congested network. Initial infrastructure improvements will be focused on highway development. Public transport infrastructure is only planned for the end of the plan period or beyond.

10.5 The Air Quality Management Study assumes that increases in traffic, which is currently the main source of air pollution, will be balanced by technological changes which will remove road vehicles as a source of NO² and harmful particulates by 2040. This is of course outside the Plan period and it seems likely that significant parts of the development would take place before changes in technology come into effect. The Plan assumes that development will reach a

peak in the mid 2020's – some 15 years prior to these additional controls and measures coming into force.

10.6 The Air Quality Management Study notes the impact of traffic speed on pollution and air quality. It is difficult to judge from the technical data provided as to how much weight this has been given. Given comments noted above it is clearly a concern that congestion will increase as a result of the development proposed. The impact of closures of the swing bridges on congestion, and therefore air quality receives no consideration in the report.

10.7 The report notes a number of locations where air quality is currently a matter of concern. These areas will potentially suffer from air quality which is below emerging international WHO standards. Understandably these routes coincide with major traffic arteries, with key receptors identified as those dwellings and buildings at the edge of the highway. The study fails to take account of the significance of many of these routes as public thoroughfares and shopping streets – London Road, Stockton Heath, for example. The study does not take into account increases in pedestrian and cycle routes, a key element of the modal shift away from car transport, the increasing number of people exposed to traffic pollution.

10.8 The WHO Ambient Air Quality Database v11 – 29 May 2018 identifies towns and cities exceeding the recommended WHO limit of $10\mu\text{g}/\text{m}^3$ for PM_{2.5}. At $14\mu\text{g}/\text{m}^3$ Warrington is considered to have one of the highest levels for this type of particulate in the UK. The WBC Air Quality Action Plan notes strong evidence of impact from PM_{2.5} but has only one monitoring site, on Selby Street adjacent to the A57 on the western side of the town centre, to measure levels, and notes

that there have been no assessments of any hot spots where concentration could result in raised levels. Review of available data from the Selby Street monitor suggests levels of between 30 and 85µg/m³, levels which are considered dangerous by the WHO.

10.9 There are no other monitoring sites in South Warrington, particularly in locations where traffic volumes and congestion are known issues.

10.10 As noted above, the Plan depends on the additional transport demands it creates being accommodated through modal shift or their impact lessened through technological change reducing vehicle emissions. At best this might be achieved at the end of, or after the plan period in the late 2030's or 2040's. The scale of development will, in the medium to long term, perpetuate issues of pollution levels across Warrington at a level acknowledged as damaging to health.

10.11 Policy ENV8 of the Submission Draft seeks to resist new developments which have an adverse impact on air quality. The scale of development proposed in the SWUE and the Garden Suburb would seem to undermine this objective, exposing residents to higher levels of NO₂ and PM2.5 with consequent issues for morbidity and premature mortality.

Key Challenges as to Soundness

Elements of the Plan are contradictory in respect of air quality. The Air Quality Assessment background paper suggests that technological change will enable the impact of new development to have limited effect on air quality, whereas specific policies within the plan seek to limit the scale of development in the interests of

protection from air pollution. Proposed policy also seeks to resist development within or close to any AQMA including the motorway network.

The plan does not reference the fact that, although monitoring is poor across the Borough, what limited information there is suggests Warrington already suffers some of the poorest levels of air quality in the Country and that this contributes to health problems and can be linked to illness and premature death. There is no complete analysis of the true impacts of the scale of development proposed and consequent use of the transport network in terms of air quality.

Reduction in emissions through technological change and/or modal shift will only come at the end of the plan period, when much of the development will have been in place for many years. There is no certainty that air quality will improve as development comes forward.

A growth focused plan based largely on logistics as a key driver is an anathema to the Plans objective of securing improvement to environment and air quality.

In an appeal decision relating to land at Peel Hall Warrington [APP/M0655/W/17/3178530] proposals for a housing development were refused as a consequence of the unacceptable level of appraisal of the potential impact on air quality. The Submission Draft fails to meet the same hurdle, in terms of impact on both existing and future residents.

NPPF Para 181 indicates a requirement that opportunities to improve air quality should be considered at the plan making stage to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. The Submission Draft is unsound in this regard.

11.1 The Plan is presented as a mechanism to ensure that new development is located and designed in such a manner so as not to result in cumulative impact on the natural environment. Development is expected to evaluate and minimise the risk of adverse impact to air, land and water quality, whilst assessing, vibration, light and noise pollution. It is considered that the developments proposed for the SWUE, the Garden Suburb and Lymm would not only fail to deliver adequate levels of amenity for new residents but would significantly and detrimentally impact on the quality of the environment available to existing residents of the Borough.

11.2 Much of the proposed development is located to the motorway corridors of the M6 and the M56. Development on the western side of Lymm encroaches into existing open space which currently separates the settlement from the elevated section of the M6 as it crosses Thelwall Viaduct. The viaduct carries upwards of 160000 vehicles per day with consequent high levels of noise and a continuous background of traffic.

11.3 Similarly parts of the proposed Garden Suburb will be experience a poor quality environment through exposure to the constant drone of traffic using the M56.

11.4 The SWUE is very poorly located. The Manchester Ship Canal and pockets of the site are noted as being potentially contaminated land. The site is opposite the Ineos Chemical works, a noted hazardous installation with HSE protection zones occupying parts of the proposed development site. Hazardous Installation buffer zones are still applicable for previous uses on Acton Grange. The chemical works

site is brightly lit, noisy and will provide a visual back drop to the new development. Noise is also likely to be an issue from the elevated section of the proposed Western Link Road, particularly on the incline from the south. The Main West Coast Mainline and strategic nationally significant railway marshalling yards are located to the north west of the proposed residential site.

Key Challenges as to Soundness

The locations selected for development would fail to meet policy objectives for the protection of the environment.

Development areas are subject to poor quality environments as a consequence of noise and light pollution, particularly as a result of proximity to the motorway network.

New infrastructure, including the Western Link and Southern Strategic Link road would bring their own issues in terms of environmental impact.

The SWUE is particularly poorly located in environmental terms as a future receptor of noise and light pollution from nearby railway infrastructure and existing industrial premises.

13.1 Warrington as a whole has limited ecological resource which merits more than local recognition. Local nature reserves and local wildlife sites as designated in the Local Plan Core Strategy are scattered across the South Warrington area.

13.2 The Moore Nature Reserve is designated as a Local Wildlife Site. The site will be directly affected by the Warrington Waterfront and Port Warrington proposals.

13.3 Much of the area to be given over to development in the SWUE, the Garden Suburb in and around Lymm is currently in agricultural use. Possibly, as consequence of the generally lower levels of agricultural classification, the areas are not intensively farmed, with hedgerows, watercourses, ponds and copses of woodland are retained. This not only provides a characterful and distinct backdrop to the urban area but does provide habitat for a range of local wildlife including protected species. The loss of large areas of green field to development will have a significant and severe impact on the biodiversity of the area.

13.4 The HRA [AECOM March 2019] presented in support of the Submission Draft identifies potentially significant effect on the Rixton Clay Pits and Manchester Mosses Special Areas of Conservation resulting from development at the SWUE and Garden Suburb, particularly due to issues associated with air quality and increased recreation. The HRA concludes that "without mitigation, increased residential, employment and retail development is likely to contribute additional pollutant emissions within the Borough of Warrington compared to a position of no growth". Perversely the HRA suggests that control should be imposed on

development which produces additional vehicle movements on the M62 to enable air quality relating to the Manchester Mosses to be taken into account. Proposed policy E8 reflects this position. No account is taken by the Council of the significance of such air quality issues for human receptors. Acceptance of the proposed growth in this context is dependent on the ongoing reduction of emissions from transport. As with wider consideration of issues of Air Quality it is contended that this is a dubious approach as reduction emissions comes at the end of the Plan period and takes no account of the impact of development throughout the Plan period and prior to factors which reduce emissions coming into play.

Key Challenges as to Soundness

The HRA correctly considers impact on areas of recognised, international conservation value. The Plan does not appropriately consider local ecological impacts and the changes brought about by the development and urbanisation of large areas of land which are currently open countryside

The HRA recognises the issues which arise from large scale development in terms of impact on air quality and identifies a risk of harm to the Special Conservation Areas. It is recommended through the HRA that measures are put in place to protect these areas. This approach is inconsistent with the approach to air quality elsewhere in the plan.

14 Character and Distinctiveness

14.1 The Submission Draft Local Plan establishes the character and distinctiveness of Warrington as a place to live and work as a key element of the vision for the plan.

“The character of Warrington’s places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed.” [Vision Statement Warrington BC Submission Draft Local Plan March 2019]

14.2 It is the submission of the SWP that the plan wholly fails to achieve this objective. The Plan has a wholly negative impact on the South of Warrington. The setting of the Conservation Areas of Walton, Grappenhall and Thelwall are adversely affected. It is worth noting that scenes from these conservation areas are commonly used in literature promoting the Borough.

14.3 A series of advisory leaflets for conservation areas were produced by the Borough Council in 2000 which outline the rationale for conservation area status of the conservation areas in Walton, Grappenhall and Thelwall, Hatton and Lymm. In each case it is recognised that it is the location of settlements within a wider rural context that provides for the distinctive character of Warrington. Warrington is distinct from other towns in the industrial heart of what was South Lancashire, insofar as the manner in which the urban settlement sits within open countryside and is surrounded by a ring of smaller, distinctive and distinguishable

separate settlements. The 2014 Core Strategy recognised this asset and sought to protect it.

14.4 The Plan deals superficially with landscape appraisal, and fails to properly assess the views into and out of the urban area provided by open space which wraps around South Warrington. The main arterial routes into Warrington from the south, the A56, the A50 and the A49 descend the southern slopes of the Mersey Valley. Expansive views of the town are possible from these routes and from a range of public viewpoints across the area. Views across this landscape will be lost as a consequence of development proposed in SWUE and the Garden Suburb.

14.5 It is a distinctive characteristic of south and north Warrington that villages have maintained some degree of separation from the main built up areas. Walton and Grappenhall Villages are close to built up areas but even then small areas of open land, within the Green Belt, enable distinction from wider development. Lymm, Appleton Thorn, Stretton and Hatton read as distinct settlements, separated from the urban areas to the north. This position applies equally to the villages of Culcheth, Croft, Winwick and Burtonwood in the north of the Borough, although the plan affords more weight to the protection of their distinctiveness, although they have no formal heritage or other designation.

14.6 The objectives of the Plan as set out in the Vision of the Submission Draft are not secured.

Key Challenges as to Soundness

The plan does not fully and properly appraise the value of the existing landscape.

The stated objective of retaining character and distinctiveness is not met.

15.1 Section 2 of the NPPF establishes that the purpose of the planning system is to contribute to the achievement of sustainable development – “meeting the needs of the present without compromising the ability of future generations to meet their own needs”.

15.2 There are three overarching objectives underpinning the achievement of sustainability

- An economic objective
- A social objective
- An environmental objective

15.3 The Submission Draft Plan fails when tested against each of these objectives.

15.4 The economic basis for the Plan is unsound. The Plan is overly ambitious and predicts levels of growth which are supported by unrealistic drivers, or promoted purely through developer ambition to exploit the strategic location of the Borough without consideration of the consequences. The Plan fails to recognise the complexities of Warrington’s economy and its relationships with activity in adjoining areas across the northwest.

15.5 The ability of the development promoted in the plan to deliver the infrastructure requirements, the benefits of regeneration in the town centre and support to the health and wellbeing of residents of the Borough is misunderstood and not achievable. Land proposed for development is not in the right places to serve the needs of residents of the Borough and there is a clear disconnect

between ambitious levels of development and the co-ordination of the delivery of infrastructure.

15.6 The Plan does not support strong and vibrant communities. Employment and accessible and affordable housing is in the wrong place to support existing residents seeking employment. Development will reinforce existing patterns of travel to work, with Warrington importing workers in lower paid less skilled roles and exporting more highly skilled and higher paid workers into Liverpool and Manchester.

15.7 The Plan proposes development which will have a dramatic and devastating impact of the environment. The proposals undermine biodiversity in promoting green field development. Alternative strategies could better exploit regeneration and make better use of previously developed land. The proposed development can only be delivered in a manner which relies heavily on the use of the private car and the transportation of freight by road. The evidence base submitted with the plan demonstrates how this makes an existing, unsatisfactory position in terms of pollution and air quality even worse.

Key challenges as to soundness

The Plan fails to demonstrate that the development which is proposed delivers the objectives of the NPPF in terms of achieving sustainable development.

16 Deliverability

16.1 The deliverability of the plan can be questioned in a number of ways.

- Unachievable levels of growth
- Failure to deliver housing development at the levels now forecast
- Ability to fund and deliver suggested infrastructure requirements
- Viability

16.2 The rationale behind the expected level of growth and the scale of housing development to support that growth is assessed in section 5 above.

16.3 Trajectories within the evidence base provided with the Submission Draft demonstrate the complexity of housing delivery in Warrington, to the extent that that in the mid-2000s the Council introduced a moratorium for new housing development. These trajectories demonstrate that notwithstanding the availability of sites, housing completions have not reached the levels anticipated by the Plan. This not only has consequences in securing the number of units expected, but would also impact on the Council's ability to secure funding through developer contributions for key elements of infrastructure required to support the development proposed.

16.4 It is unclear whether the proposals and the level of infrastructure required to support development can be funded. The Infrastructure Delivery Plan provided as evidence base to the Submission Draft includes a range of transport, environmental and community based infrastructure requirements needed to support development. The Council assumes that funding will come from forward

funding of key infrastructure requirements and resourced through an allocation of infrastructure costs on a per dwelling basis secured through planning obligations. However the IDP notes that discussion of the mechanics of this funding process is the subject of ongoing discussion. The Plan cannot be considered sound in the absence of certainty over these funding arrangements and the impact of additional costs per dwelling on overall viability. This will inevitably beg the question of the ability and willingness of developers to deliver affordable housing, open space and other provision if demands for strategic infrastructure provision question viability.

16.5 The ability to fund and to deliver infrastructure is so unclear so as to confirm the view of many that development will take place and infrastructure will lag behind, leaving problems of under provision, increased difficulty in accessing services and more congestion.

16.6 The as yet unfunded projects identified in the IDP which relate to the Garden Suburb appear to total in excess of £350m. This equates approximately to £60k per dwelling. As it stands it is very difficult to see how the proposals can viably support the infrastructure requirements.

16.7 The SWP does not have access to resources and information necessary to properly interrogate costs attributed to different elements of infrastructure proposed. It is considered however that given the critical requirement to deliver infrastructure on programme and alongside any proposed development, that the Council must provide clarity on the cost analysis of infrastructure provision.

16.8 The LTP4 is presented alongside the Submission Draft on the basis that it demonstrates the package of transport infrastructure provision which is expected

to be in place to serve the proposed development. The SWP and the affiliated Rethinking South Warrington's Future (RSWF) Group have submitted their observations on the content and veracity of the LTP. These representations do not seek to rehearse those submissions, but would note the range of legitimate questions, highlighting flaws and issues within the LTP, which would raise similar concerns over the deliverability of the complete package of transport infrastructure needed to support the scale and form of development proposed.

Key Challenges as to Soundness

The Submission Draft proposes large scale development which will only operate successfully if a comprehensive range of infrastructure is in place.

The mechanics for funding such levels of infrastructure remain unknown.

Funding will depend on development progressing and delivering funding through developer contributions. Given uncertainty over the ability to deliver housing at a rate in excess of recent levels of completions raises equal uncertainty over the ability to fund and deliver required infrastructure in a timely fashion.

The Plan and evidence base fail to provide certainty over costs and therefore to interrogate the viability of passing these costs onto developers through planning obligations.

The LTP4 is presented in parallel to the Submission Draft so as to demonstrate the level of infrastructure needed to support the development proposed. The LTP

includes flaws and unsubstantiated assumptions which bring into doubt the ability to match development with infrastructure provision.

17 Specific Policy Appraisal

Policy/Statement number	Policy Objective	Comment
Vision - Warrington 2037 4 (p17)	" The intersection of the two new major national rail routes, HS2 and Northern Powerhouse Rail in Warrington will further enhance the Town's strategic connectivity"	<i>This is speculative with no certainty as to direct linkage to HS2 and no specific proposals for Northern Powerhouse rail</i>
6 (p18)	" The character of Warrington's places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements"	<i>See section 14</i>
W1(p20)	"...sustainable growth of Warrington through ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure..."	<i>The plan will not deliver sustainable growth. The release of Green Belt will threaten not support regeneration of inner Warrington</i>
W2(p21)	"To ensure revised Green Belt boundaries maintain the permanence of the Green Belt in the long term"	<i>See section 8</i>

W3(p21)	Strengthening the role of Warrington Town Centre	<i>The release of Green Belt for employment and residential development in South Warrington will reinforce the disconnect between residents and use of the town. Residents will continue to use ready access to the motorway network to access, town centre retail and leisure in more attractive locations</i>
W4(p21)	Providing new infrastructure and services to support growth and address congestion	<i>New infrastructure will not achieve both objectives. New infrastructure will just shift the location of congestion and will continue to place demand on the existing highway network. New infrastructure will be insufficient to meet the increased demand created by new development</i>
W5(p21)	“...reinforces character and distinctiveness...whilst protecting, enhancing and embracing the Borough’s historic, cultural, built and natural assets”.	<i>Character and distinctiveness will be considerably diminished. Historic and cultural assets will be harmed.</i>
3.3.17	<p>Alternative locations for Green Belt release were outperformed by the chosen spatial strategy</p> <ul style="list-style-type: none"> • Dispersed pattern makes it harder to deliver required infrastructure • Development to the west leads to issues of meeting Warrington and Widnes and issues with social and physical 	<p><i>The tests applied to consider Green Belt release were flawed, dependent on subjective assessment and weighted to consider one green belt purpose over another.</i></p> <p><i>Issues identified are capable of resolution with a dispersed pattern of development able to link with existing and imminent infrastructure improvements</i></p>

	<p>infrastructure</p> <ul style="list-style-type: none"> • Extension to the north impacts on A49 and junction 9 of M62. Impact of the character of Winwick and a designated battle ground • Eastward extension would have ecological impact and sterilise mineral reserves. 	<p><i>The presence of the designated battleground does not sterilise the scope for development in the vicinity of Winwick. The designation should be considered on a par with designated ancient monuments, conservation areas and listed buildings which have not been considered a barrier to development elsewhere in the Borough.</i></p> <p><i>Impact on the motorway and major arterial routes is managed with proposed development elsewhere. The Plan provides limited explanation of the basis for this conclusion and the extent of mitigation needed to enable development to take place. It would appear that there is an inconsistency of approach.</i></p> <p><i>The HRA recognises that development proposed will have potential unacceptable impact on ecologically significant areas as a result of issues of air quality. There would remain scope for more modest development without encroachment into designated areas.</i></p> <p><i>The assessment takes no account of the potential balancing factors which might support development in these locations including proximity to existing employment areas; access to improving infrastructure, including West Warrington Railway Station; proximity and impact on the most deprived wards in the Borough.</i></p> <p><i>This analysis is poor and incomplete.</i></p>
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<p>3.3.28 (p27)</p>	<p>The Western Link road will connect the A56 to A57 and contribute to addressing congestion in Warrington. It enables development of the Waterfront and the SWUE and development within the town centre.</p>	<p><i>It is not clear how the Western Link resolves existing problems of congestion. The route will divert some traffic travelling from South Warrington to Omega around the edge of the town centre, but it will not serve to improve access to the town centre.</i></p> <p><i>The route will deposit traffic onto the A56 in Walton and the A57 in Sankey onto already congested parts of the network.</i></p> <p><i>The route would serve no obvious purpose to serve traffic generated by the proposed Garden Suburb.</i></p> <p><i>The business case for the route relies heavily on the scope to access land on Warrington Waterfront and Port Warrington for development. It is considered questionable whether the route can serve the dual purpose of serving the traffic generated by the new development and relieve existing congestion at the same time.</i></p> <p><i>The focus of access to the development areas is clearly road based, contradicting the expectation that Port Warrington would be based on water and rail</i></p>
<p>3.3.29(p27)</p>	<p>Phase 1 of a Garden Suburb strategic link connecting the A49to the A50 is prerequisite for additional development.</p>	<p><i>It is welcomed that there is recognition of the need for this route prior to development taking place.</i></p> <p><i>The detailed purpose and function of the route is unclear. It would seem to have scope to function as an alternative route for HGV</i></p>

		<p><i>traffic to reach the Garden Suburb from junction 10 of the M56 and potentially a route to avoid junction 9/20 of the M56/M6 at times of congestion at that junction.</i></p> <p><i>Whilst it has been suggested that the route of the strategic link included in the Garden Suburb master plan is for illustrative purposes, it is stated that the road links the A49 to the A50.</i></p> <p><i>It must therefore result in a new junction which can only logically be placed between J10 M56 and the Cat & Lion junction in Stretton. This area is already heavily trafficked and a major junction serving large scale development to the east would add to existing queuing and levels of congestion back to junction 10. There is no clarity as to how this element of the Plan has been assessed.</i></p>
3.3.30(p27)	A stepped trajectory is required to the Western Link and Garden Suburb link to enable development to come forward	<p><i>This is welcomed but raises question over the ability to fund and deliver infrastructure prior to development taking place, where funding is dependent on developer contributions to a large extent. The ability to commit to infrastructure delivery of the scale proposed, in advance of development is questioned.</i></p>
Exceptional Circumstances – 3.4.7 – 3.4.10	<ul style="list-style-type: none"> • Meeting Warrington’s development needs • Creating new sustainable communities which support infrastructure delivery 	<p><i>It is questioned whether the exceptional circumstances presented are sufficient to justify the scale and extent of Green Belt release.</i></p> <p><i>The scale of Warrington’s development needs is overstated.</i></p>

	<ul style="list-style-type: none"> • Parallel with development of brown field • Garden suburb provides comprehensive and sustainable approach to meeting development need • SWUE new sustainable community facilitated by the Western Link 	<p><i>Adjustment of the plan to cover the usually expected 15 year period would afford greater scope to manage opportunities which may arise during the plan period to develop on brown field sites.</i></p> <p><i>The plan suggests a level of urban capacity which could accommodate development needs over that period with more modest release of Green Belt.</i></p> <p><i>Employment land is locate in the Green Belt with sole purpose of exploiting Warrington’s location on the motorway network; because the sites are already in the control of developers and because of the commercial advantages of expanding existing operations in the area.</i></p> <p><i>This same justification could be applied to any part of the Green Belt adjacent to a motorway junction.</i></p> <p><i>The new communities are not sustainable. They perpetuate travel focused on the private car and fail to deliver any clear economic, social or environmental benefit.</i></p> <p><i>It is development which facilitates the infrastructure not the reverse. The scale and concentration of development proposed is only justified on the basis that it delivers a level of developer return which supports the funding of additional infrastructure.</i></p>
Failing to meet	Options to reduce development needs will	<i>The Plan should not blindly aspire to accommodating growth at any</i>

<p>development needs – 3.4.11 – 3.4.</p>	<p>reduce ability to plan for growth and comprehensive infrastructure delivery.</p> <p>Increased inward commuting to work, leading to increased congestion</p> <p>Lack of affordable housing</p> <p>Undermines Warrington’s role as a key driver of the North West economy</p>	<p><i>cost. The Plan should support the appropriate management of growth so as to secure “the right development in the right place”</i></p> <p><i>The Plan does not solve the issue of current congestion and potentially makes it worse by adding traffic to different points on the network.</i></p> <p><i>Travel to work patterns in Warrington are complex. It is unclear how the failure to meet development needs results in increased inward commuting.</i></p> <p><i>Affordable housing provision should be planned and considered in terms of location, travel to work patterns and wider employment opportunities. The proposed SWUE and Garden Suburb do not provide an appropriate solution in this regard.</i></p> <p><i>Warrington will retain its role given its strategic location on the highway network. In other respects local drivers will change as wider, regional drivers come into effect. Activity within the adjoining city regions will influence Warrington’s role in the NW to a greater extent than the proposals of the Submission Draft suggest.</i></p>
<p>DEV1 (3)</p>	<p>Garden suburb – min 6490 homes with 4201 in plan period plus 930 with consent</p>	<p><i>See comment on MD2 and MD3 below</i></p>

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	SWUE min 1631 homes within plan period	
DEV1 (5) Housing trajectory	2017-2021 847 dpa 2011-2037 978 dpa	<i>See comment in Housing Section above</i>
4.1.13 Urban Capacity	Significant levels of town centre regeneration leading to additional housing capacity.	<i>See comment in Housing Section above</i>
Housing distribution and trajectory	Confirms that the Council can deliver the overall housing requirement for the Borough against the stepped housing trajectory	<i>See comment in Housing Section above</i>
Supply beyond the plan period – 4.1.28	Master planning identifies an illustrative capacity of 18000 dwellings within the urban area – with likely additional capacity coming forward beyond the plan period – Fiddlers Ferry	<i>See comment in Housing Section above</i>
DEV2 – Meeting Housing Needs	Affordable housing of 20% or 30% depending on location unless viability appraisal demonstrates otherwise.	<i>See comment in Housing Section above</i>
DEV2 – Housing	Mix should be informed by housing mix	<i>See comment in Housing Section above</i>

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Type and Tenure	monitoring target.	
DEV2 – Housing for older people	20% of development to accommodate needs of older people determined on a site by site basis.	<i>There is a lack of clarity as to how this might be delivered</i>
DEV3 – Gypsy and Travelling Show person provision	Adequate provision of sites against GTAA	<i>Impact of recent approvals relative to need</i>
DEV4 – Economic Growth and Development	Minimum of 362 ha for B1, B2 and B8 uses	
DEV4	<p>116 ha of employment in Garden Suburb.</p> <p>In other locations development should be away from areas sensitive to heavy vehicle movement; with direct access to the primary route network; and with access to rail or the Manchester Ship Canal</p>	<p><i>The development of a logistics based employment use in the Garden Suburb is poorly considered.</i></p> <p><i>As with other development involving freight movement, development which fails to provide scope for access to rail or water should be resisted.</i></p> <p><i>The development is in the wrong place. It will increase inward commuting into the Borough and will be difficult to assimilate with the form of housing proposed in the Garden Suburb irrespective of attempts to deliver affordability.</i></p>

4.2.6	Recognising special locational needs	
4.2.12	Assessing future employment land requirements	
DEV5 and 4.3.4	Retail and leisure needs	<p><i>Although titled retail and leisure policy DEV5 makes reference to service provision through a hierarchy of centres including neighbourhood hubs.</i></p> <p><i>The Council consistently places emphasis on service provision through the establishment of neighbourhood hubs at Woolston, Orford Park and Gt Sankey. No such provision is highlighted for South Warrington.</i></p>
GB1 Green Belt	<p>Land removed from the Green Belt</p> <ul style="list-style-type: none"> • Garden Suburb • SWUE • Land at Lymm <p>Inset settlements Lymm</p> <ul style="list-style-type: none"> • Lymm • Oughtrington <p>Green Belt Settlements</p> <ul style="list-style-type: none"> • Broomeedge 	<p><i>Confused detail over the boundary of Grappenhall Village as a Green Belt Settlement. Plan at Figure 6 is inaccurate and confusing.</i></p> <p><i>Grappenhall Village is noted as a Green Belt settlement but appears to be separated from the Green Belt by proposed development.</i></p>

	<ul style="list-style-type: none"> • Grappenhall Village • Hatton • Heatley • Stretton • Weaste Lane 	
5.1.7	Capacity in adjoining areas	<p>It is considered that the Plan has not properly taken account of development proposals in the adjoining areas, proposed in respective local plans and within the GMSF.</p> <p>The GMSF agenda to focus development on existing areas of growth in South Manchester whilst promoting regeneration in North and East Manchester is inconsistent with approach to growth advocated in the Submission Draft.</p>
5.1.9	Development needs <u>and</u> aspirations	
5.1.12	Green Belt Assessment – has informed spatial strategy	<i>Green Belt Assessment is flawed and sets out from a premise of the need to accommodate development.</i>
Ensuring Green Belt Boundaries Endure Beyond	Avoid need for further alteration	<p><i>Release is justified on the basis of unattainable levels of growth</i></p> <p><i>Makes potentially unnecessary provision beyond the plan period which itself exceeds the requirements of the Framework.</i></p>

the Plan Period		<i>Still within the period covered by the 2014 Core Strategy Local Plan which did not identify need for Green Belt release</i>
Defining inset and washed over settlements 5.1.18		<i>See comment on GB1 above</i>
TC1	<p>Widening the role of the Town Centre</p> <p>Promotion of the town centre for office development</p> <p>Relies on transformation of Bank Quay railway station</p>	<p><i>Disconnect with key areas of growth and the town centre contradicts ambitions to strengthen viability and vitality.</i></p> <p><i>No indication of how jobs growth and particularly higher value jobs will be created.</i></p> <p><i>Query likelihood HS2 and Northern Powerhouse rail connecting in Warrington Town Centre.</i></p> <p><i>The plan misses the opportunity to explore relocation of the outdated Warrington Hospital on to a site within the town centre connected with accessible transport facilities and the means of releasing the existing site to residential development.</i></p> <p><i>Misplaced ambition over sites such as the stadium quarter and the failure to note the potential for redevelopment of the site of New Town House are demonstrative of the muddled thinking of the Plan.</i></p>

		<i>Plans for retail in the town centre seek to buck the trend for High Street development. The inaccessibility of the town centre from the areas of South Warrington which are the subject of development proposals and the focus on employment land for logistics functions, do not support town centre regeneration.</i>
INF1	Sustainable travel	<i>See comments on Infrastructure above</i>
INF2	<p>Transport safeguarding</p> <p>A new or replacement high level crossing of the Manchester Ship Canal between Stockton Heath and Latchford.</p> <p>Western Link Road</p>	<p><i>The ability of South Warrington to accommodate the level of development proposed without significant improvement to the local highway network is accepted.</i></p> <p><i>A new crossing of the Manchester Ship Canal might serve this purpose.</i></p> <p><i>The safeguarding is limited to the immediate approach and the bridge itself but makes no provision of wider improvement merely linking to already congested and problematic parts of the network.</i></p> <p><i>Previous safeguarding, particularly that associated with the New Town Master plan, recognised that the crossing would need major additional infrastructure to be effective.</i></p> <p><i>The safeguarding tabled is ineffective and meaningless.</i></p> <p><i>The Western Link Road is presented as a route serving the additional</i></p>

		<p><i>development proposed in South Warrington and to relieve town centre congestion.</i></p> <p><i>Policy recognises and quotes national guidance in terms of the Western Link principally relating to access to development land within the Warrington Waterfront and Port Warrington – not to these other objectives.</i></p>
INF3	<p>Utilities and Telecommunications</p> <p>Proposed growth will require an increase in waste water treatment capacity. Discussion has not revealed the need to identify new sites for waste water treatment but there is likely to be a need to increase the capacity of existing treatment facilities in the South of the Borough</p>	<p><i>It is not clear as to the nature and extent of development required to facilitate such improvements and the associated works required.</i></p> <p><i>Improvement to the Bell House Farm Sewage Works in Walton will require development in the narrow wedge of Green Belt between Walton and Moore.</i></p> <p><i>The plan makes no reference to water supply which has been an issue in Warrington historically delaying progress with development.</i></p> <p><i>In the context of climate change and the scale of development proposed in neighbouring conurbations there should be certainty as to how a concentration of development in South Warrington can be accommodated as per the expectation of the NPPF.</i></p>
INF4	<p>Community facilities</p> <p>The Council will seek to promote health and</p>	<p><i>The proposed Garden Suburb is the largest single residential development site outside historic New Town proposals, yet it alludes to the delivery of community facilities rather than establishing a</i></p>

	<p>wellbeing and reduce health inequalities, by supporting the development of new, or the co-location of existing education, health, social, cultural and community facilities – where possible in defined centres and neighbourhood hubs</p> <p>New Hospital Site</p>	<p><i>clear and coherent policy for the delivery of such accommodations. There is a considerable risk in the absence of such a policy that development will occur without the essential and necessary facilities being in place.</i></p> <p><i>Given the scale of development and the increase of population inherent in the plans, vague reference to the possibility of a new hospital is inadequate. Plans should provide for a more certain and clear approach led by the Council and Warrington &Co in consultation with the commissioners and providers of health care. This is especially so as the existing hospital site represents a major redevelopment opportunity within the urban area which would support a range of objectives relating to the regeneration of the town.</i></p> <p><i>This is an excellent example of side stepping consideration of difficult options and a tendency to revert to the less challenging approach of development of green field Green Belt sites.</i></p> <p><i>Whilst providing for the general provision of a neighbourhood centre in the Garden Suburb there is no clarity as to how a neighbourhood hub might in reality be delivered.</i></p>
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<p>INF5</p>	<p>Delivering Infrastructure</p>	<p><i>There are inherent weaknesses in the approach taken to secure the delivery of infrastructure. One of the principles behind the large scale allocations of SWUE and the Garden Suburb is the ability of larger schemes to fund and deliver larger scale infrastructure requirements.</i></p> <p><i>It is unclear from INF5 how planning obligations will provide a tool adequate to deliver funding for the infrastructure required. The plan needs to be more explicit in approach and contain appropriate mechanisms to ensure that piecemeal development of allocations does not circumvent the necessary contributions to infrastructure provision.</i></p> <p><i>The absence of a CIL charging mechanism, prepared as an integral part of the development plan is a weakness.</i></p> <p><i>It is considered that there is considerable scope for challenge of costings within the IDP. Under estimation of costs will result in an inability to secure funds for provision.</i></p> <p><i>The PDO and related viability appraisal attracted criticism in terms of the over valuation of development. Value in development is critical to the ability to secure sufficient resource to the extensive list of physical and social infrastructure required to support the development and to achieve the wider benefits expected by the</i></p>
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		<p><i>Council.</i></p> <p><i>If high levels of viability are to be secured, the form, character and tenure of housing provision is likely to be affected.</i></p>
DC2	Historic Environment	<p><i>The proposals conflict with the concept of protection of the towns historic environment and heritage assets. The proposed allocations give rise to conflict with the character and appearance of a number of conservation areas and other designated heritage assets.</i></p>
DC6	Quality of Place	<p><i>The designation of large scale development in South Warrington runs counter to the aspirations of this policy. Master plans are indicative of a failure to understand the context in which the developments would be delivered.</i></p>
ENV8	Environmental and Amenity Protection	<p><i>Air Quality – provision is made within ENV8 to resist development which has an adverse impact on air quality, but in proposing the development contained within the Plan, with the consequent impact on congestion and air quality, the Council effectively undermines the purpose and objective of this policy.</i></p> <p><i>In order to protect the Manchester Mosses Special Area of Conservation this policy seeks to manage development which produces more than 200 HGV movements per day on the M62 – questions the allocation of a large logistics site close to this part of</i></p>

		<p><i>the motorway network.</i></p> <p><i>The allocations in South Warrington place new residential development in close proximity to the AQMAs following the motorway network.</i></p> <p><i>The policy seeks to resist development near too busy roads or noisy businesses. The allocated sites in South Warrington are commonly adjacent to the main arterial routes crossing the Borough including motorways. The SWUE is located adjacent to existing and proposed industrial premises with part of the site located within a zone of protection for a hazardous installation. The key access route to the proposed Warrington Waterfront and Port Warrington would be via the A56 through Walton.</i></p> <p><i>Parts of the Garden Suburb abut existing and proposed areas of employment use and the highway network which accesses these sites. The design of the Garden Suburb strategic link indicates that it would take HGV's from Barleycastle to the A49 across an allocated residential area.</i></p> <p><i>The objectives of policy ENV8 would seem to be contradicted by the development plan allocations.</i></p>
MD2	Garden Suburb	<i>Appleton Thorn will lose its distinct identity.</i>

		<p><i>There are no details of the extent and form of the key elements of infrastructure including the rationale behind gypsy and traveller accommodation and community waste recycling provision.</i></p> <p><i>The development plan framework should be tabled as part of the Local Plan not as a separate development plan document.</i></p> <p><i>There is no clarity as to how developer contributions (as at point 11) can be secured in a manner consistent with the NPPF or other policies of the Plan.</i></p> <p><i>There is no indication as to the speed of delivery of the Homes England permitted sites and therefore the time frame for the provision of infrastructure outlined at point 14. There is concern that the dependence on the Garden Suburb to bring forward development in the early to mid stages of the plan period is inconsistent with the ability to ensure funding and consider programming.</i></p> <p><i>The considerable dependence on developer contributions adds complication as the timing of contributions will usually be phased post approval and staged as development progresses. There is likely to be an inherent time lag in the delivery of infrastructure alongside the delivery of development.</i></p> <p><i>The employment development in the Garden Suburb needs to be</i></p>
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		<p><i>considered as a whole not piecemeal in order to meet the requirements of point 15.</i></p> <p><i>The policy should require delivery, not just programming before stages of the development can proceed.</i></p> <p><i>The provision of a residential care facility is welcomed but how is this provided.</i></p> <p><i>There is no indication as to the means by which new community facilities can be delivered and service provision secured and funded.</i></p> <p><i>There is no indication as to how the new Country Park would be delivered and funded in the long term. The Council is known to struggle to fund existing facilities such as Walton Hall. Allocation without such consideration fails to grasp the long term viability of the content of the Plan and reinforces the concern that the plan is based on an urban design exercise rather than a considered and deliverable development plan.</i></p> <p><i>In considering employment development the Council is already contradicting key elements of the Submission Draft including measures to control impact on the natural environment.</i></p> <p><i>What does the requirement for development to respect the Green</i></p>
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		<p><i>Belt boundary mean? (point 54)</i></p> <p><i>The proposal will change the character and appearance of the conservation areas. The Victoria Road/York Drive CA loses its relationship with the open rural setting on the south side of the Bridgewater Canal.</i></p> <p><i>Grappenhall Village CA is surrounded by open countryside will be lost as result of the development. The role of Grappenhall Hall is unclear and the space between the Bridgewater Canal and the village edge is removed from the Green Belt. Although described as washed over the Village appears to be separated from any area of Green Belt. The Plan is convoluted and confusing having regard to the protection of this valuable heritage asset.</i></p>
MD3	South West Urban Extension	<p><i>Policy should specify the scale of development. "Around" 1600 is meaningless. Either a precise number or a clear range is required.</i></p> <p><i>There is no indication as to how the required tenure mix or the proposed nursing/care home can be delivered.</i></p> <p><i>What is a comprehensive package of transport measures?</i></p> <p><i>What does a contribution towards the Western Link mean?</i></p> <p><i>No development will be permitted until funding for Western Link is</i></p>

		<p><i>certain, but 30% of funding is supported by returns from the development.</i></p> <p><i>What status will the master plan take? When will it come forward?</i></p> <p><i>Requirement for 30% affordable – has this been factored into the any viability assessment to ensure that infrastructure and other requirements funded through developer contributions stack up?</i></p> <p><i>It is unclear as to the extent to which the Council has taken the presence of a COMAH protection zone into the allocation of the wider area for development. No reference is made to the Planning Practice Guidance – “Hazardous Substances”</i></p> <p><i>There is limited reference to the impact of various COMAH zones relating to industrial premises close to the allocated site or to the various gas pipelines which run across the site and ethylene pipelines which run adjacent to it. Initial appraisal by AECOM suggested that density of development on the site may be restricted to meet HSE requirements. It is known that HSE have objected to open space/recreational uses in Warrington close to pipelines and other hazardous installations. The Submission Draft is unclear as to the significance of such matters.</i></p> <p><i>Irrespective of health and safety issues, the proposed housing development of the site “benefits” from its borders being defined by</i></p>
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		<p><i>the West Coast Mainline, The Manchester Ship Canal, the proposed Western Link, the A56 and a sewage works which will need upgrading to meet the demand from increased development in South Warrington. The ability to secure an attractive, high standard of development in such a location is questionable.</i></p> <p><i>No consideration has been given to the increase in the number of receptors and the consequent generation of complaint about noise, odour, air quality and light pollution from established business. This is contrary to the provisions of NPPF para 186, which expects consideration of potential threat to established business from new development.</i></p> <p><i>Suggestion of an average minimum density of 30 dph would appear to contradict advice provided in previous assessment of the urban extension by AECOM.</i></p> <p><i>Developers would be required to ensure financial contribution for the delivery of a new primary school and places at secondary schools. Phasing of the delivery of school places and new development should be clarified. It should be noted that there is currently no sixth form provision in South Warrington, outside Lymm, until provision was potentially made within new high school provision in the proposed Garden Suburb. The sustainability of development in the urban extension should be questioned until</i></p>
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		<p><i>there is clarity over such provision.</i></p> <p><i>The delivery of a health facility within the development is outside the LPA's scope. There is no consideration of the means of delivery beyond physical infrastructure.</i></p> <p><i>There should be clarity over HSE acceptance of public open space located in COMAH exclusion zones. The HSE have objected to use of areas of land so zoned where gathering of people needs to be considered in the context of the extent of risk from the source of the hazard. It is difficult to see that this exercise has been completed in this instance.</i></p> <p><i>Policies relating to the natural environment are statements not policy. There is no clarity in their goals or objectives and no clear method of delivery.</i></p> <p><i>Commentary on Green Belt section above highlights concern over Green Belt assessment, acceptance that high value Green Belt should be released and that fundamental purposes of the Green Belt are ignored.</i></p> <p><i>The paucity of transport infrastructure provision is described at length above. As with other policies the approach to transportation relating to the Urban Extension consists of statement of intent, but no substantive policy to demonstrate that the development could be</i></p>
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		<p><i>delivered in a sustainable manner. The proposed plan for the Western Link shows no alteration to the A56 south of the proposed junction with the new road and no indication of improvement to routes through Stockton Heath needed to reach, employment, education and other facilities.</i></p> <p><i>The South West Urban Extension Heritage Impact Assessment is presented as being consistent with Historic England Guidance and best practice. It is not however signed and there is no clarification as to the author's qualification in presenting the document</i></p> <p><i>The assessment makes no reference to the proposed Western Link, an inherent part of the scheme, with direct impact on a number of the heritage assets noted – particularly Walnut Tree Farm.</i></p> <p><i>The assessment fails to recognise the interrelationship between landscape and heritage. The Conservation Area and individual heritage assets are components which contribute to the historic and architectural quality of the location.</i></p> <p><i>Large scale development, dramatically changing the scale and population of the area surrounding Walton Village, will change the character and ambience of the setting for the conservation area and the related listed buildings.</i></p>
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OS5	Lymm Massey Brook	<i>Massey Brook</i>
OS6	Lymm Pool Lane	<i>At present there is a clear and distinct edge to the settlement and boundary to the Green Belt formed by development on Highfield Road. The allocated site at Massey Brook extends into open countryside and represents settlement sprawl. Massey Brook does not provide a visually obvious boundary of any permanence.</i>
OS 7	Lymm Rushgreen Road/Tanyard Farm	<i>The site is prominent when viewed from the A56 especially when viewed from the elevation of Camsley Lane Bridge. The allocation would begin to merge the existing settlement with the ribbon of development on Massey Brook Lane.</i>
OS8	Lymm Warrington Road	<i>Pool Lane and Warrington Road</i>
		<i>The Pool Lane and Warrington Road sites similarly encroach into open countryside which currently provides an attractive and distinct rural edge to the village.</i>
		<i>The sites are prominent in views approaching Statham from the west. The Warrington Road site slopes gently upwards to the north and provides an attractive landscaped setting for the north western edge of Lymm.</i>
		<i>No information is provided to ensure that there is sufficient capacity and space to extend local primary and secondary schools or health</i>

		<p><i>facilities.</i></p> <p><i>Statham Lodge is a grade II listed building. The setting of the building will be adversely affected.</i></p> <p><i>The site is less than 350m from the edge of the elevated section of the M6 as it crosses Thelwall viaduct. No submissions are made to demonstrate that this specific allocation can be considered acceptable in terms of air quality and noise given this location.</i></p> <p><i>These sites are not accessible to the shopping and health facilities, although access to the Statham Primary school is good. Facilities in Lymm can only be reached via Barsbank Lane which includes a narrow footpath in a tunnel beneath the Bridgewater canal and a steep climb to Booths Hill Road. It would be possible to use the Transpennine Trail footpath but this is unlit. Alternative routing is via Whitbarrow Road which is narrow, climbs steeply and has no footpath in parts.</i></p> <p><i>Tanyard Farm</i></p> <p><i>Much of this site is already committed to development under a permission granted on appeal under ref 2017/31816.</i></p>
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		<p><i>The acceptability of the development was however largely predicated on acceptance that the site was mostly previously developed land and that openness to the Green Belt was so unduly prejudiced as a consequence. The land to the west now incorporated into the proposed allocation is not previously developed. When added to the permitted Tanyard Farm development, Lymm and Outrington will become joined not just by a ribbon of development on Rushgreen Road but with a bulk of development filling the space between Rushgreen Road and the Bridgewater Canal.</i></p> <p><i>This development would be highly visible from the canal and its towpath.</i></p> <p><i>The permitted development was approved subject to a planning obligation. The provisions of the obligation are different to those expected by the allocation. It is therefore unclear as to whether the expected requirements of any future agreement can be related to the development of all of this allocation.</i></p> <p><i>Depending on how development comes forward – there is considerable potential for funding for infrastructure would fall foul of funding arrangements relating to the pooling of developer contributions.</i></p>
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		<p><i>Issues applicable to all Lymm sites</i></p> <p><i>Until such time as a new high school is built on the Garden Suburb, it would be necessary to demonstrate that existing high school capacity is sufficient to accommodate increasing demand.</i></p> <p><i>There is no indication as to how footpath and cycle way connections to the Garden Suburb employment area can be achieved.</i></p> <p><i>The development is likely to increase traffic using Cherry Lane the B5158 to reach junction 20 of the M6. This requires use of already complex and congested junctions and a busy one way system. The cumulative impact of proposed allocations has not been taken into account in this regard. No improvement to these junctions is proposed in the IDP.</i></p> <p><i>It is indicated that these sites will be brought forward early in the plan period. It is not clear that the land is all in control of owners amenable to development and readily available for development.</i></p> <p><i>It is unclear as to how much of the total development in Lymm would come forward for development, in a manner which supports the predictable availability of essential infrastructure, given that such improvements are wholly dependent on developer contributions.</i></p>
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18 Duty to Cooperate/Community Consultation

18.1 The SWP have expressed concern over the approach to public engagement throughout the gestation of the Local Plan.

18.2 The PDO was poorly presented to the public. Ill considered plans appearing to indicate confirmed transport routes caused much angst to those potentially affected, including in some cases the failure of property transactions. The consultation process was poorly conducted, with the late addition of consultation events in the South of the Borough, where facilities and staff were overwhelmed by the sheer numbers of residents wishing to understand the nature of the proposals.

18.3 This situation was evidence of the lack of effective engagement with the public or representative bodies – including the Parish Councils. The purpose and function of the PDO was misunderstood because it was so poorly presented. There was no effective discussion as to the expectations and requirements of the development plan with the people which it should be designed to serve.

18.4 The large number of representations submitted to the Council was a reflection of the poor quality of that process.

18.5 The SWP had hoped and expected that lessons would be learned from the PDO. It was expected that the Plan would be adjusted from one driven by a desire for growth at all costs.

18.6 After the PDO the Submission Draft was discussed with developers and landowners, as is clear from the submissions made when the Draft Plan was released. There was no effective engagement prior to issue of the Submission

Draft with public interest groups or statutory bodies mandated to support local, public interests. The Borough Council did not follow its own Statement of Community Involvement.

18.7 This problem was compounded as the Council conducted a comprehensive review of evidence and background documents to support the Submission Draft. Little, if any of this documentation was placed in the public domain before the issue of the Draft Plan as part of the Full Council decision making process. The evidence base was not placed as background papers to the report to Full Council. It seems likely that members making the decision to release the Submission Draft for consultation were aware of the evidence base. Many of the documents have an issue date of March 2019, giving rise to question over the ability to properly incorporate their conclusions into a complex and lengthy development plan document.

18.8 The Submission Draft was placed in the public domain with no preamble.

18.9 The effectiveness of the consultation process has been weakened as a result, undermining the validity of the Draft Plan.

19 Conclusions

19.1 It is the contention of the SWP that the Submission Draft Local Plan is not sound and fails to meet the expectations of paragraph 16 of the NPPF.

19.2 The Plan has not been positively prepared; is not appropriately justified; is not effective or deliverable and shows inconsistencies with national policy.

19.3 The plan is not sound and should not proceed to adoption in its present form.

19.4 This conclusion is reached on the premise that:

- There is no justification for predicted levels of growth which are central the spatial expression of the plan
- There is no sound or logical connection between aspirational growth and the spatial plan.
- There is consequently no justified need for the level of housing or employment development anticipated by the plan.
- There is no need for the scale of Green Belt release.
- There is no rational consideration of the existing levels of congestion or the impact of development on that congestion.
- Proposed infrastructure does not deal with existing pressures or issues of congestion and cannot therefore accommodate the additional demands of the proposed development.
- There is no need for development which will result in an unacceptable level of harm to air quality and the environment

- There is no need for development which will destroy the character and distinctiveness of Warrington and its constituent settlements.
- The proposals are not sustainable and run counter to national policy.
- There is no clarity or certainty of the means of delivery of the planned proposals. Funding methodologies are flawed and unreliable and based on the unreliable returns expected from growth and development.

19.5 The Plan is not sound. It should be reassessed and modified prior to submission to the Secretary of State for examination.

19.6 The risk of not taking this approach has to be considered in terms of the rejection of the plan as unsound at examination, and the period of time from that conclusion of the Secretary of State to the production of a further Submission Draft. This is a far greater risk than reviewing the plan now and producing a revision which addresses the reasons for its current lack of soundness.