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Walton Parish Council

Representation to the Submission Draft of the Warrington Local Plan



Client	Walton Parish Council
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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 for the Walton Parish Council, based on discussions held with the Parish Council in their role as representatives of the residents of Walton.

1.2 Walton Parish Council is a member of the South Warrington Parish Councils' Local Plan Working Group (SWP). This group 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, that so much of the land that 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. Namely, Lymm, Grappenhall and Thelwall, Appleton, Stretton, Hatton and Walton Parish Council. 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 representations of the Walton Parish Council should be considered in the broader context of the submissions made by the SWP.

1.4 The representation is set out as follows :-

- National Policy Context
- A portrait of Walton Parish
- 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
- 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

1.5 A conclusion will appraise these issues and how in the opinion of Walton Parish Council they show that the plan is not sound and should not proceed to adoption in its present form.

2 National Policy Context

2.1 It is recognised that the Borough Council has a statutory obligation to produce a development plan – “*which provides 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 a 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

- 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 A Portrait of Walton Parish

3.1 To fully understand the Parish, its context within Warrington and the wider area, it is important to record some of the key characteristics of the area, as background to the evidence presented in support of the conclusions of this representation.

3.2 Walton is situated in South Warrington, an area which is characterised by a collection of small settlements and villages. The settlements of Walton, 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 which lies within the North Cheshire Green Belt as formally defined in successive development plans since the early 1990's.

3.3 Walton and 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]

3.4 Walton Parish is a large, mainly rural area situated in the south west of Warrington Borough (map attached). It lies to the south of the River Mersey and the Manchester

Ship Canal which is its northern boundary. The only crossings of the Manchester Ship Canal are a Victorian swing bridge for vehicle traffic in Lower Walton and a high level railway bridge at Acton Grange. The Bridgewater Canal runs east to west through Higher and Lower Walton and has one large bridge (A56) and 5 small 'hump back' bridges crossing it.

3.5 The A56 is the main road running south-west / north-east across the parish originating from the M56 motorway, Junction 11 and basically bisects the parish. The A56 roadway within the Parish is single carriageway from the boundary to Walton Village, then dual carriageway to Lower Walton. At peak times this road is extremely congested between Walton Village and Lower Walton, exacerbated by the frequent closing of the swing bridge to allow shipping to progress along the Manchester Ship Canal. This bridge is also very narrow and HGV's cannot pass each other on the bridge. The area is badly polluted and noisy due to this congestion.

3.6 There is a railway line crossing the north-west corner of the parish and this carries passenger and freight traffic through Bank Quay station on the West Coast Main Line and also the Chester and North Wales line. The high level railway crossing of the Ship Canal is very noisy and in frequent use.

3.7 Walton Parish is mainly an agricultural area, most of which is Green Belt and contains many wooded areas as well as a golf course. It contains around 700 houses with a population of around 1,500. There are 2 main pockets of population - Lower Walton and Higher Walton – Lower Walton being by far the larger with around 520 houses and is the edge of the Warrington urban sprawl. Lower and Higher Walton are separated by Green Belt which contains the urban sprawl and also acts as a

strategic gap between Warrington and Runcorn/Moore preventing the two towns merging.

3.8 There is little commercial activity in the Parish apart from rural type activities (agriculture, nursery, turf farm, stables, gun club etc). There are 2 public houses, 2 small shops and a 2nd hand car sales plot as well as a large sports club with rugby and cricket pitches, tennis and squash courts and archery. In addition, there is the Walton Lea Partnership which provides supported learning, development & work activities for adults and young people with learning difficulties. It has 8 social enterprises including retail, horticultural, woodwork, floristry, recycling donated furniture & bikes as well as craft work.

3.9 There is a crematorium beside the A56 between Lower Walton and Walton Village which is extremely busy with a funeral around every 30mins, during the week. The corteges have a distinct slowing effect on the traffic travelling west on the A56, along Chester Road and in Stockton Heath Village.

3.10 Given that there are not many jobs available in Walton or indeed South Warrington, most of the working population commute to work in other places.

3.11 The area is noted as having origins dating back to the period of Roman occupation but has more recently been influenced by the presence of the Barons of Halton and then the industrialists of the Greenhall and Brooke families, with Walton Hall and the Parish Church established by Sir Gilbert Greenhall (Lord Daresbury) in the 19th Century.

3.12 Walton Village is a conservation area '*whose character and appearance it is desirable to preserve and enhance*' (*Listed Buildings & Conservation Act 1990*). It is the combination of buildings of character, their groupings and the numerous belts of trees

and the areas of open space which gives Walton its great charm (Designation Report 1977). There are 20 listed buildings and structures within Walton Parish.

3.13 In Warrington, this area is the only landscape relating to an estate developed during Victorian times or earlier. Lord Daresbury created an extensive coherent landscape with a distinctive character with red sandstone walls and the architecture of Estate buildings – a landscape quite rightly regarded as a Heritage Asset. Any proposal to impose extensive developments within or adjacent to the core area, should be resisted vigorously.

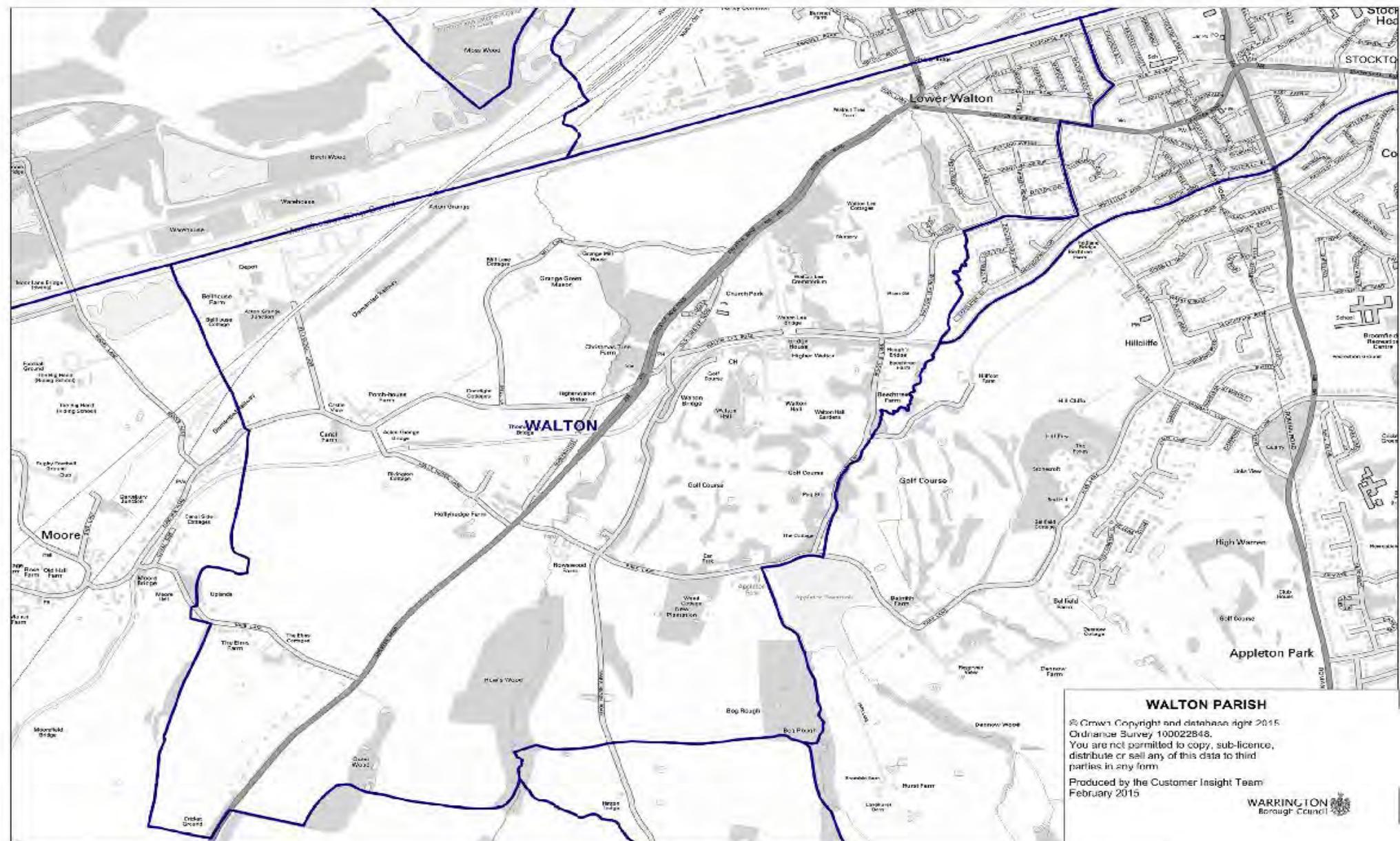
3.14 There is much recreational activity taking place in Walton Hall and Gardens as well as at Walton Golf Course. Walton Hall is one of the most frequently visited attractions within Warrington Borough and has formal gardens, large park area, a children's zoo, live concerts and music events, children's play area, adventure golf/pitch & putt/putting as well as bowling. Weddings and conferences are also held in the main building. This area acts as a vital 'lung' for the people of Warrington and surrounding areas, presenting an opportunity to leave dense urban areas and enjoy open countryside, the conservation area and Walton Hall & Gardens.

3.15 The population of Walton look to Stockton Heath as its local centre, with its many shops, restaurants, public houses, GP's surgery, banks etc. They look to north of the Manchester Ship Canal for the hospital, larger supermarkets, petrol stations, garages etc. Ease of access to the motorway network provides access to facilities outside the Borough, particularly for shopping and leisure trips.

3.16 There are health and safety issues in the Lower Walton area apart from the pollution and noise caused by the congestion. Firstly, there is a chemical works and distribution facility on the other side of the Manchester Ship Canal which necessitates

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COMAH protection zones; secondly, there are gas, petrol and ethylene pipelines running across and adjacent to the Green Belt north-west of Lower Walton.



4 Summary of Key Issues

- 4.1 It is the contention of the Parish Council 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 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 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, including Walton.**
 - 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.**

5 Growth

5.1 The Borough Council published an Economic Development Needs Assessment Update produced by Mickledore and BE Group in February 2019. Critically for Walton 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 (SEP) Jobs Growth Scenario in predicting growth.
- Logistics land requirements driven by proximity to motorway junctions.
- Variation in forecasts from alternative providers, commissioned by BT which anticipated differing levels of growth.

5.2 The Walton and the other South Warrington Parish Councils are concerned that the approach taken to consideration of growth is unreliable and unrealistic. It is acknowledged as being underpinned by the unsubstantiated and business driven

expectations of the SEP. These ambitions are not democratically accountable and are led by business interests with direct involvement in land released for development on the back of the Needs Assessment. This concern is reinforced by the evidence of three different economic assessments with three different conclusions as to levels of growth produced at the point of production of the Preferred Development Option. Walton PC's views are aligned with those of the SWP in this regard.

5.3 The key consideration for Walton Parish Council, which arises from the exaggeration of levels of attainable growth, is the manner in which this is interpreted as a driver for development which, in the view of the Submission Draft Plan can only be accommodated by massive levels of Green Belt release, mostly in South Warrington, with the South West Urban Extension and Warrington Waterfront being of huge consequence for Walton.

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.

It is essential in the light of conflicting data that there is a sense check on the level of growth, particularly in terms of the household projections and population growth.

There is less certainty on 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 Parish Council would again seek reference to the shared view on housing supply presented in the representations of the SWP. An exaggerated level of growth leading to an unnecessary and excessive assessment of housing supply requirements is key to the objection to the Plan.

6.4 Reference should also be made to the specific comments on the SWUE elsewhere in this representation.

6.5 Key to the Parish Council's concern is that poor assessment of housing supply requirements unnecessarily prompts consideration of the release of highly valued Green Belt within the Parish.

Key Challenges as to Soundness

The scale of housing development proposed across the Borough needs to be "sense checked". The scale of development and the release of Green Belt in Walton is not justified.

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.

Household formation projections are based on 2014 figures and are unreliable as a means of anticipating levels of growth in Walton and South Warrington.

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 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 Hospital site issues prior to excessive release of Green Belt.

Density figures in the plan require a "sense check". There has been no discussion prior to the release of the Submission Draft of the approach to density and the consideration of very high density in the urban areas.

Appraisal of specific allocations including the SWUE, will demonstrate the absence of logic in the location of new housing, remote from employment opportunities.

7 Employment Land

7.1 The largest single employment land allocation is within Appleton Parish but immediately abuts and impacts heavily on Walton as well as Grappenhall and Thelwall. As a signatory to the representations made by SWP in respect of the wider impacts of the proposals of the Submission Draft on South Warrington as a whole, the Parish Council would support the contention 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 such a large area of land from the Green Belt.

7.2 The proposed employment related development within the Warrington Waterfront and to some extent the expansion of Omega will impact upon Walton. The impact of the poorly considered Western Link Road is assessed in later sections of this submission. It is noted however that the link road will benefit and provide access to the new development but will have severe ramifications for the existing highway network in South Warrington, particularly the A56 through Walton.

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

7.4 It is not disputed that the geographically, strategic position of Warrington makes the area an attractive location for logistics development, but the principle 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.

7.5 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. This would create issues particularly, for connectivity to appropriate sources of labour and the wider improvements needed the highway network to effectively accommodate large scale additional freight movements, entirely by HGVs.

7.6 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.

7.7 This is considered by the Borough Council to outweigh development of Green Belt identified by its own advisors as strongly meeting Green Belt objectives and purposes. Ecological and landscape appraisal is weak and understated in order to weigh in favour of the economic arguments. The totality of development proposed subsumes the villages of Walton and Appleton Thorn which lose much, if not all of their identities as distinct settlements. In contrast to the approach applied in consideration of development in North Warrington.

7.8 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.

7.9 The submission of a further application on the remaining part of the land identified as a proposed allocation, may to some extent reflect the attraction of Warrington as a location for logistics development but this 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.

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

7.11 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.]

7.12 The Walton Parish Council 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 transhipment 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.

7.13 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.

7.14 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 SWUE and Warrington Waterfront.

7.15 The Parish Council's objection to this approach is based on concerns over the Western Link Road decanting 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 a predicted 1000 daily HGV movements 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 release of Green Belt for employment land at the scale proposed is not warranted.

The allocation of land for employment use in the Warrington Waterfront and Port Warrington proposals has extreme and adverse impacts in Walton in terms of traffic, congestion and air quality.

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 Green Belt

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 amendment to those boundaries may be made through non-strategic policies including neighbourhood plans".

8.2 It should be noted that the ARUP assessment, in introducing its methodology spends sometime considering the approach and justification for review particularly against housing need, whilst stating that its purpose is to appraise the effectiveness of the Green Belt against current policy objectives and acknowledged Green Belt functions. To some readers this may create a justifiable concern that this 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.

- Reliance on use of defensible boundaries to define parcels limits the proper assessment of areas. Whilst it may ultimately be necessary to look to boundaries consistent with NPPF and NPPG guidance, it interferes with the understanding and assessment of the purposes served by the Green Belt. This approach effectively concludes that development should be allowed to continue up to the point that a durable boundary with the Green belt can be established.
- The approach taken in the assessment wrongly 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 balanced debate over the weight to be given to Green Belt purpose relating to the protection of historic towns is noted. However once it is accepted that consideration should be given to the heritage value of the town centre and Lymm through conservation area status, consistency requires the same approach to conservation area designation in Thelwall, Grappenhall, Stockton Heath, Walton and Moore. The historic value of the Walton

Conservation Areas is heavily dependent on the 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 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 The detail of the Green Belt appraisal submitted within the evidence base presented with the Submission Draft, particularly in the context of South West Warrington, attracts criticism notwithstanding any subsequent consideration of any justification for its release.

8.6 The Green Belt surrounding Walton is within General Assessment Areas 13, 14 and 15 in the submitted Green Belt Assessment. Of these general areas, area 13 is considered to make a strong contribution to the purposes and functions of the Green Belt, with areas 14 and 15 making a moderate contribution.

8.7 The proposed scale of Green Belt release creates a number of tensions with the function and purpose of the Green Belt:-

- The release of land for housing and employment purposes undermines the urban renewal objectives of other policies of the Submission Draft and the policies of adopted and emerging plans in Halton.

- The Green Belt in South West Warrington around Walton provides for an essential gap between Warrington, Moore and Runcorn. The Green Belt Appraisal recognises this function of the Green Belt as currently designated with a number of the parcels of Green Belt identified as performing a strong Green Belt function.
- The Warrington Green Belt Study recognises that GA14 forms a "largely" essential gap between Warrington and Runcorn. It is claimed that a reduction in the gap would significantly reduce the distance between towns but would not result in them merging. The Parish Council shares the view of Halton Borough Council in disagreeing with this conclusion, considering it disregards Moore Village and the ultimate creation of an unbroken line of development between Runcorn, Walton and Warrington.
- The proposed release of Green Belt will result in the unrestricted sprawl of the built up area. The assessment only views sprawl in the context of outward sprawl from Warrington. If a parcel is not currently adjoining the settlement boundary it is classed as having limited impact against this purpose of the Green Belt. This skews a quantitative assessment and does not consider the ultimate impact on the function of the Green Belt as a single entity.

8.8 It is worthy of note that with the exception of Winwick, none of the settlements in the north of the Borough retained within the Green Belt, have designated heritage value which Green Belt designation might be designed to protect. This approach is inconsistent with that applied in South Warrington.

8.9 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.

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

8.11 The importance of the Green Belt in the Walton area is recognised in terms of the risk of merger with Moore and developed areas of 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. Aforementioned reference to the selective assessment of which historic areas should be considered in the context of Green Belt purpose is apparent in the case of Walton, with the setting of one of the most historic parts of the Borough significantly altered as a result of encroachment of development and a change to the semi- rural setting of Walton Village.

8.12 The assessment ignores the impact of the Ship Canal corridor as a sound and logical boundary to the urban area in Walton. 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 and 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.

8.13 The setting of Walton Village would be changed to the considerable detriment of the locality. The Green Belt function of protecting the setting of historic settlements is eroded.

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 areas which have been identified as performing strongly against the purposes of Green Belt are shown to be released and made available for development, when 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 Walton, 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 and 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.

9 Infrastructure

9.1 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 an already failing network including highway infrastructure.

Transport Infrastructure - Road

9.2 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.

9.3 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 development allocations would impose a significant pressure on the transport network. [AECOM Development Appraisals for South West Urban Extension and Garden Suburb].

9.4 It is considered that there are a number of issues raised by the Transport Model which merit challenge. These are fully appraised in the representations of the SWP, which the Parish Council fully endorses. The failure to take account of the

periods when the swing bridges are closed and the consequent impact on congestion, is a key example.

9.5 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)

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

9.7 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.

9.8 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 key points of congestion - Walton, London Road, Stockton Heath and Latchford swing bridges, Latchford Village, Grappenhall Road, Lumb Brook Bridge, Wilderspool Causeway result in a failure to demonstrate how public transport priority and cycling, away from congested and heavily trafficked routes can be delivered.

9.9 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. Doubt can be cast over the reality of the Link actually providing a level of connectivity between locations which results in a shift in routing and consequent lessening of congestion. This is a key area of objection for the Parish Council given the clear issues with the capacity of the highway network to deal with existing levels of demand and the additional demands created by the development of the proposed site allocations.

9.10 The already congested and polluted A56 will have to support and contend with:

- Around 7000 daily car journeys emanating from the SWUE, in addition to development in Halton.
- Around 4000 daily car and 1000 HGV movements associated with the Waterfront development via the Western Link.
- Traffic from new development in SE Warrington, including the Garden Suburb.
- The Western Link as a toll free alternative to the Mersey Gateway crossing.

9.11 This current congestion is readily observed at am and pm peak periods on the approaches to Chester Road swingbridge. Even without any interruption from bridge openings, traffic queues along most of Chester Road north of the swing bridge and for a considerable length of the A56 back to its junction with Runcorn Road. At peak times queuing traffic will prevent right turn movements from side roads to travel north to Warrington on the A56. The Sandymoor and Norton areas of Runcorn provide for the place of residence for many whose employment is in Warrington making the A56 corridor a key point of access to the town.

Similarly Warrington recognises the key role of the Daresbury Science Park as a factor in its growth aspirations. Access to this area from most of Warrington will rely on the A56 corridor.

9.12 The Plan 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].

9.13 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 south of Warrington Town Centre.

9.14 The Local Highway Authority has presented the proposed Western Link as an alternative route into the town centre and 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.

9.15 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 A56. It is estimated within the Plan and the business case of the Western Link that 1000 HGV movements will use the Western Link daily.

9.16 The impact of the development 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.

9.17 The Submission Draft notes that it will be a requirement that trips generated by the development can be adequately accommodated by Warrington's transport network. Clearly this is the correct approach but the policy fails in 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

9.18 Congestion and delays at these points provide 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.

9.19 A major barrier to this approach is of course funding. The business case for the Western Link demonstrates that it is the development proposed which creates potential funding for infrastructure improvements. In the case of the Western Link

prudential borrowing by the Council will ultimately be supported through business rates, New Homes Bonus and CIL/S106.

9.20 The Parish Council has concerns that the residual funding requirements are understated and that the costs of the Western Link will exceed current budgeted costs given the complexity of the project.

9.21 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)

9.22 The Manchester Ship Canal is crossed at 6 points, although Moore Swing Bridge provides access to a limited area:-

- Moore Swing Bridge (partly in Halton)
- Chester Road Swing Bridge (A56)
- Stockton Heath Swing Bridge (A49)
- Latchford High Level
- Latchford Swing Bridge (A50)
- Thelwall Viaduct (M6)

9.23 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)

9.24 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)

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

9.26 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. The largest single element 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 across the Bridgewater Canal constructed in the 18th Century.

Transport Infrastructure - Rail

9.27The 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. No site has any current rail access and relies almost 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]

9.28The Port Warrington Rail link is critical to the ability to enable this site to function without resulting in serious problems for traffic conditions and consequent environmental and air quality issues in Walton. The Plan provides no certainty over the delivery of the rail link or clear requirement that connection to the rail network is achieved early in the development of the port facilities. The failure to achieve such a connection would result in all goods moving to and from vessels on the Ship Canal needing to use road based transport. At present road access is only possible via the wholly unsuited Runcorn Road and Moore Lane. The proposed Western Link Road would provide access to Warrington Waterfront and Port Warrington on the northern side of the Ship Canal, but would still link to the unimproved route of the A56 between Walton Lea and junction 11 of the M56.

9.29It is noted that the Borough 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.

9.30 Planning Permission has existed for some time for the rail link from Port Warrington to the West Coast Mainliner, but no action to develop has accrued.

9.31 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.

9.32 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.

9.33 The Plan relies on transformational infrastructure provision of this kind yet shows no clear understanding of the complex interrelationships between development and infrastructure and misses the opportunity to properly plan for the implications of such development. 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

9.34 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.

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 delivery and timing 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 Borough Council's direct control.

The proposed infrastructure provision has the potential to worsen, rather than to deal with current issues of air quality and pollution resulting from road traffic emissions.

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 Submission Draft increase the risk of problems arising from poor 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 commented on 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 cannot assume that parts of the development would not 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 on the A49 and A56 will increase as a result of the development proposed. The impact of closures of the swing bridges receives no consideration in the report. The Study does not take account of the changing pattern of vehicle movement on the A56 as a consequence of the development and the associated additional traffic light controlled junctions between Runcorn Road and the Chester Road Swing Bridge, including the junction to serve the Western Link. There is greater possibility for vehicles to be stopping and starting along this stretch, not just at peak periods.

10.7 It is unclear as to the extent of impact on air quality as HGVs traverse the steep grade of the Western Link as it climbs to cross the Ship Canal over a short distance.

10.8 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 thoroughfares – London Road in Stockton Heath, or as the pedestrian and cycle routes envisaged as key elements of the modal shift away from car transport and the consequent number of people as opposed to physical receptors exposed to the high levels of pollution.

10.9 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 PM2.5. 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 PM2.5 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 85 $\mu\text{g}/\text{m}^3$, levels which are considered dangerous by the WHO.

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

10.11 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 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.

10.12 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 from 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.

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.

An appeal decision relating to land at Peel Hall Warrington [APP/M0655/W/17/3178530] rejected proposals 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 Environment

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 close 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 160,000 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 exposed to a poor quality environment due 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 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

is brightly lit, noisy and will provide a visually poor 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 as a consequence of the steep incline for traffic heading north. The Main West Coast Mainline and the strategic, nationally significant railway marshalling yards are located to the north west of the proposed residential site and these are noisy and brightly lit.

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 road and railway infrastructure and existing industrial premises.

12 Ecology

12.1 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.

12.2 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.

12.3 Much of the area to be given over to development in the SWUE in Walton is currently in agricultural use. As a consequence of the lower levels of agricultural classification, these areas are not intensively farmed. Smaller fields containing hedgerows, watercourses, ponds and copses of woodland are retained. This not only provides a characterful and distinct backdrop to the urban area but also provides 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.

12.4 The HRA [AECOM March 2019], presented in support of the Submission Draft identifies potential significant effect on the Rixton Clay Pits and Manchester Mosses Special Areas of Conservation resulting from the scale of proposed development in South Warrington including the SWUE and Garden Suburb. This principally relates 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 of 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.

13 Character and Distinctiveness

13.1 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 2037 Para 6 Warrington BC Submission Draft Local Plan March 2019]

13.2 It is the submission of the Parish Council that the plan wholly fails to achieve this objective. The Plan has a wholly negative impact on Walton and the South of Warrington. The setting of the Conservation Areas of Walton, Grappenhall and Thelwall are adversely affected. The historical, heritage and cultural assets, unique to Walton will be irreparably harmed by the scale of development proposed. The harm is detrimental to Warrington as a whole such is the value placed on Walton Village, Walton Hall and Gardens and the surrounding area.

13.3 A series of advisory leaflets for conservation areas was produced by the Borough Council in 2000 which outline the reasons 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 way in which the urban settlement is located within a wider area of

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.

13.4 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.

13.5 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 with the exception of Winwick these villages have no heritage status.

13.6 The objectives of the Plan as set out in paragraph are not secured.

Key Challenges as to Soundness

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

Walton will triple in size inevitably diminishing character and appearance.

The Submission Draft reflects the ambition to retain the separation and distinction of villages in the north of the Borough but fails to do so in the south.

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

The Submission Draft fails to properly assess the impact of the proposed development on designated heritage assets – Walton Village Conservation Area, listed buildings within the Walton Estate and Walton Hall and Gardens.

14 Sustainability

14.1 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”.

14.2 There are three overarching objectives underpinning the achievement of sustainability

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

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

14.4 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.

14.5 The ability of the development promoted in the plan to deliver the infrastructure requirements, the benefits of regeneration in the town centre and provide support to the health and wellbeing of residents of the Borough is not achievable. Land for development is not in the right place. Employment opportunities are remote from locations where employees are likely to find it viable to live. Infrastructure is poorly

planned to connect jobs and housing notwithstanding concern over the inability to deliver the large and complex infrastructure schemes proposed.

14.6 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.

14.7 The Plan proposes development which will have a dramatic and devastating impact on the environment. The proposals undermine biodiversity in promoting green field development when 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 congestion, 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.

15 Deliverability

15.1 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

15.2 The rationale behind the expected level of growth and the scale of housing development to support that growth is assessed in section 5 above. That assessment concludes that the level of growth predicted is overly ambitious and unable to deliver development at a scale or value sufficient to enable the large scale and complex infrastructure requirements to be delivered.

15.3 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.

15.4 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.

15.5 The ability to fund and to deliver infrastructure is so unclear that it confirms 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. The development of the Chapelford area of North Warrington provides an example of this situation.

15.6 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. Figures will be very similar for the SWUE, with contributions to major infrastructure costs, such as the Western Link, commitments to affordable housing provision, green infrastructure provision etc. As it stands it is very difficult to see how the proposals can viably support the defined infrastructure requirements.

15.7 WBC have identified the required provision for education and health facilities but there is no evidence or commitment from commissioning and provision bodies that they will be able to deliver the services required within appropriate timeframes.

15.8 The Parish Council does not have access to resources and information necessary to properly interrogate costs attributed to the 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 and funding of infrastructure provision, particularly of the Western Link before committing to the SWUE allocation.

15.9 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.

15.10 These observations raise significant doubt over the ability to secure all of the infrastructure required to serve proposed development in the Walton area. They also highlight the fact that notwithstanding new infrastructure provision much of the development will still depend on the existing, congested highway network and the Victorian structures on which that network depends.

Key Challenges as to Soundness

The Submission Draft proposes large scale development which will only operate successfully if a comprehensive range of infrastructure is put into place in a timely and co-ordinated fashion.

The mechanics for funding such levels of infrastructure remain unclear.

Funding will depend on development progressing and delivering funding through developer contributions. Given the uncertainty over the ability to deliver housing at a rate in excess of recent levels of completion, 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.

16 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	<p><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 centre. Residents will continue to use ready access to the motorway network to access town centre retail and leisure in more accessible and attractive locations.</i></p>
W4(p21)	Providing new infrastructure and services to support growth and address congestion	<p><i>New infrastructure will not achieve both objectives. New infrastructure will just shift the location of congestion and will continue to place unacceptable demand on the existing highway network. New infrastructure will be insufficient to meet the increased demand created by the new development.</i></p>
W5(p21)	"...reinforces character and distinctiveness...whilst protecting, enhancing and embracing the Borough's historic, cultural, built and natural assets".	<p><i>Character and distinctiveness will be considerably diminished. Historic and cultural assets will be harmed. Walton will triple in size and the setting of its heritage assets will be severely compromised.</i></p>
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 	<p><i>The tests applied to consider Green Belt release are 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 which would be able to link with existing and</i></p>

	<p>issues with social and physical 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>imminent infrastructure improvements .</i></p> <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 potentially 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>
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		<i>This analysis is poor and incomplete.</i>
3.3.28 (p27)	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><i>It is not clear as to 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>It should be clearly demonstrated that the decision to construct the Link Road as a single carriageway and not a dual carriageway is consistent with the level of car and HGV traffic that it will have to bear.</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, on both sides of the Ship Canal at the same time.</i></p> <p><i>The focus of access to the development areas is clearly road based,</i></p>

		<i>contradicting the expectation that Port Warrington would be based on water and rail connectivity.</i>
3.3.29(p27)	Phase 1 of a Garden Suburb strategic link connecting the A49 to the A50 is prerequisite for additional development.	<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 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	<i>This is welcomed but raises question over the ability to fund and deliver infrastructure prior to development taking place, where</i>

	development to come forward	<i>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 in question.</i>
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 • 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>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. Adjustment of the plan to cover the usually expected 15 year period would afford greater scope to manage opportunities that will arise during the plan period to develop on brown field sites.</i></p> <p><i>The Plan should anticipate and consider how 5 yearly reviews can maximise the opportunity to avoid the unnecessary release of Green Belt.</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 located in the Green Belt for 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</i></p>

		<p><i>adjacent to a motorway junction</i></p> <p><i>The new communities are not sustainable. They perpetuate travel focus 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 of development proposed is only justified on the basis that it delivers a level of developer return to support funding of the required additional infrastructure.</i></p>
Failing to meet development needs – 3.4.11 – 3.4.	<p>Options to reduce development needs will 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>The Plan should not blindly aspire to accommodating growth at any cost. The Plan should support the appropriate managed growth 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, 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 Urban Extension and Garden Suburb</i></p>

		<p><i>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>
DEV1 (3)	<p>Garden suburb – min 6490 homes with 4201 in plan period plus 930 with consent</p> <p>SWUE min 1631 homes within plan period</p>	<i>See comment on MD2 and MD3 below</i>
DEV1 (5) Housing trajectory	<p>2017-2021 847 dpa</p> <p>2011-2037 978 dpa</p>	<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 indentifies 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 Type and Tenure	Mix should be informed by housing mix monitoring target.	<i>See comment in Housing Section above</i>
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 to how this might be delivered.</i>
DEV3 – Gypsy and Travelling Show person provision	Adequate provision of sites against GTAA	<i>The grant of planning permission in Stretton since the issue of the Submission Draft will have changed the shortfall of accommodation against the GTAA.</i>
DEV4 – Economic Growth and Development	Minimum of 362 ha for B1, B2 and B8 uses	<i>See section on economic growth</i>
DEV4	116 ha of employment in Garden Suburb.	<i>The development of a logistics based employment use in the Garden</i>

	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><i>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	Land removed from the Green Belt <ul style="list-style-type: none"> • Garden Suburb 	<p><i>Confused detail over boundary of Grappenhall Village as a Green Belt Settlement. Plan at Figure 6 is inaccurate and confusing.</i></p>

	<ul style="list-style-type: none"> • 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"> • Broomedge • Grappenhall Village • Hatton • Heatley • Higher Walton • Stretton • Weaste Lane 	<i>Grappenhall Village is noted as a Green Belt settlement but appears to be separated from the Green Belt by proposed development</i>
5.1.7	Capacity in adjoining areas	
5.1.9	Development needs <u>and</u> aspirations	
5.1.12	Green Belt Assessment – has informed spatial strategy	<i>Green Belt Assessment sets out from a premise of the need to accommodate development.</i>
Ensuring Green Belt Boundaries	Avoid need for further alteration	<i>The Plan attempts, but fails, to justify release of land from the Green Belt on the basis of unattainable levels of growth. Green Belt</i>

Endure Beyond the Plan Period		<p><i>boundaries are unnecessarily extended to boundaries beyond any evidentially based requirement.</i></p> <p><i>Makes potentially unnecessary provision beyond the plan period which itself exceeds the requirements of the Framework.</i></p> <p><i>Still within the period covered by the 2014 Core Strategy Local Plan which did not identify need for Green Belt release.</i></p>
Defining inset and washed over settlements 5.1.18		<p><i>See comment on GB1 above</i></p>
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 in general and higher value jobs growth 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</i></p>

		<p><i>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> <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></p>
INF1	Sustainable travel	<p><i>See comments on Infrastructure above</i></p>
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 would serve this purpose.</i></p> <p><i>The safeguarding for the High Level Bridge is limited to the immediate approach and the bridge itself, but makes no provision for wider improvement of the already congested and problematic local highway 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 development proposed in South Warrington and to relieve town centre congestion. It is considered that the Link would need to be a dual carriageway to serve this purpose.</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 on 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 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>The proposed SWUE and the Garden Suburb contain the largest single residential development sites outside historic New Town proposals, yet it alludes to the delivery of community facilities rather than establishing a 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 conjunction with local commissioners and providers of health services. This is especially relevant 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</i></p>

		<p><i>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 be funded and delivered.</i></p>
INF5	Delivering Infrastructure	<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 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 financial 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 the costings within the IDP. Under estimation of costs will result in</i></p>

		<p><i>insufficient resource to deliver the required levels of infrastructure.</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 Borough 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, particularly in Walton.</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. The absence of Master Plans is 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 adverse impact on air quality, but in proposing the</i></p>

	<p><i>development contained within the plan the Council is effectively saying that changes in vehicle emissions can be ignored in the case of allocated development.</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 – this questions the allocation of a large logistics site close to this part of 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 with 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</i></p>
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		<p><i>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>
MD1	Warrington Waterfront	<p><i>The development is wholly dependent on the Western Link and policy understandably reflects this position.</i></p> <p><i>The Parish Council objects to this allocation on the basis of inadequate consideration of the impact on Walton of the Western Link and the additional car and HGV traffic which will use it.</i></p> <p><i>As noted elsewhere, it is contended that the Link Road will not resolve existing congestion but will simply move the point of congestion to different locations including the A56 in Walton.</i></p> <p><i>The Link Road will serve the SWUE, Port Warrington and Warrington Water Front allocations. It is a single carriageway road with new traffic light controlled junctions joining the A56 in at least three locations in Walton. Congestion and excessive queuing at these junctions is inevitable.</i></p> <p><i>Concern is noted above in respect of traffic impact on air quality.</i></p>

	<p><i>Concern is expressed in comments on infrastructure delivery above, as to the ability to secure all the necessary infrastructure to serve the development in a timely and coordinated fashion, not least because of issues over funding.</i></p> <p><i>The connection of Port Warrington to the rail network is critical to prevent unacceptable levels of HGV traffic using the site and its access routes. The previous allocation of the site and the grant of planning permission for the rail connection has not delivered the development or the rail link. The Submission Draft does not make any reference as to why this is so. Delivery of the allocation relies on funding decisions outside the Council's control with Network Rail. There is not clarity as to any priority afforded to this scheme.</i></p> <p><i>There is no clarity as to the rationale behind Port Warrington. What is the necessity to unload goods at a berth in Warrington when there are existing rail connected berths downstream.</i></p> <p><i>There is concern that the berth at Port Warrington would require vessels to pass through the swing bridges and Latchford Locks in order to turn. The Ship Canal has no turning facility between Runcorn and Irlam. Additional openings of the swing bridges would exacerbate concerns over congestion.</i></p> <p><i>The Parish Council shares the concerns of Halton Borough Council</i></p>
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		<p><i>and Moore Parish Council in terms of the impact of Green Belt release needed to accommodate the Warrington Waterfront development.</i></p> <p><i>Concern is similarly shared over the impact of the allocation on Moore Nature Reserve.</i></p>
MD2	Garden Suburb	<p><i>Appleton Thorn will lose its distinct identity.</i></p> <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. It would seem likely that the dependence of the Garden Suburb to bring forward development in the early to mid stages of the plan period may be</i></p>

	<p><i>inconsistent with the ability to ensure funding.</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 due to the funding lag.</i></p> <p><i>The employment development in the Garden Suburb needs to be 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 to be provided and maintained.</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 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</i></p>
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	<p><i>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 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 lost as a 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> <p><i>The Garden Suburb is not located in Walton but its designation will have significant impact particularly in terms of traffic, with occupiers of new homes in the SWUE travelling to schools and other facilities</i></p>
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		<p><i>in the new Suburb. The Plan presumes that new residents would seek to access employment opportunities in the Garden Suburb employment area.</i></p> <p><i>Links from the Garden Suburb to North West Warrington will rely on routes to the Western Link through Walton.</i></p>
MD3	South West Urban Extension	<p><i>Walton will triple in size and lose much of its character and distinctiveness. 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 how the required tenure mix or the proposed nursing/care home can be delivered and maintained.</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? What programme and schedules will be applied?</i></p> <p><i>No development will be permitted until funding for Western Link is certain, but 30% of funding is supported by returns from the development. How will the financial position be balanced?</i></p> <p><i>What status will the master plan take? When will it come forward?</i></p> <p><i>Requirement for 30% affordable housing – has this been factored</i></p>

	<p><i>into the 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 for this site.</i></p> <p><i>Irrespective of health and safety issues, the proposed housing development of the site "benefits" from its borders being defined by 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</i></p>
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	<p><i>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, 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 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 establishing</i></p>
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	<p><i>and maintaining primary care services beyond the provision of 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 the 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 the 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 a statement of intent, but no substantive policy to demonstrate that the development could be delivered in a sustainable manner. The proposed plan for the Western Link shows no alteration to the A56 south of the proposed</i></p>
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		<p><i>junction with the new road and no indication of improvement to routes through Stockton Heath needed to reach, employment, education, leisure 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 and Grange Green Manor.</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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17 Conclusions

17.1 It is the contention of the Walton Parish Council that the Submission Draft Local

Plan is not sound and fails to meet the expectations of paragraph 16 of the NPPF.

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

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

17.4 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.
- The release of Green Belt destroys the distinctive setting for Walton Village.
- The release of Green Belt to accommodate the SWUE is not justified.
- 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 Walton and other 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 speculative returns expected from growth and development.

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

17.6 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.