



10<sup>th</sup> June 2019

Dear Sir,

**Consultation on Warrington Borough Council's Proposed Submission Version Local Plan**

We are writing to register our concerns regarding Warrington Borough Council's (WBC's) Proposed Submission Version Local Plan (PSVLP) and in particular the proposed plans for a "Garden Suburb" (Employment Area and "Garden Villages") in South East Warrington. Having submitted feedback on the earlier Preferred Development Option (PDO) to WBC in September 2017, we are disappointed that the PSVLP does not adequately address the issues identified in our previous letter. We therefore wish to emphasise to WBC's Planning Policy Team the following apparent weaknesses in the PSVLP:

**Garden Suburb Employment Area and "Garden Villages"**

The PSVLP states that "The Garden Suburb will provide a major new Employment Area as an extension of the existing Appleton Thorn/Barleycastle industrial estates. This will make a significant contribution to meeting Warrington's future employment land needs. It will comprise large scale distribution, logistics, industrial uses and offices, benefiting from its accessibility to the motorway network at the intersection of the M6 and M56."

Distribution developments do require significant land area. We note that there are significant areas of brownfield land in Warrington and that more will be available after the decommissioning of Fiddler's Ferry power station. In our opinion the PSVLP does not pay sufficient attention to brownfield development opportunities, instead focusing excessively on localised development of South Warrington Green Belt.

The Garden Suburb Employment Area will be focused on the distribution sector, and WBC's assumption seems to be that the associated new jobs it claims will be created will drive housing demand in South Warrington. However, it is simply unrealistic to believe that all claimed new jobs will require South Warrington housing, particularly bearing in mind that distribution has a high level of contractorization, is not known for its high wages, and that South Warrington is an area where housing cost is significantly above the average. The PSVLP appears to be based on very ambitious estimates both of housing demand and of delivery capacity; the official population growth figures forecast less than half WBC's stated need for the next twenty years and the PSVLP calls for rates of housing delivery (i.e. construction) that have not been achieved before in Warrington. The establishment of the new Employment Area cannot be linked to a requirement for housing at the level proposed for the "Garden Villages" and we believe that the fundamental basis of the plan for housing development is consequently unsound.

**Loss of Green Belt Resource**

South Warrington Green Belt represents an important amenity for local residents and for residents of Warrington generally. In addition, Green Belt land supports the separate identities of villages such as Grappenhall and Stretton. The proposed development will have a very significant and permanent negative impact on the environment of South Warrington and will be detrimental to the character of its existing villages.

The Government's National Planning Policy Framework states that "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." Further, the National Planning Policy Framework states that "Green Belt boundaries should only be altered in exceptional circumstances". We note that WBC's consultants Ove Arup in their Green Belt Assessment recommended that WBC would need to "Develop the exceptional circumstances case to justify altering Green Belt Boundaries".

The PSVLP states that "The starting point for Warrington's exceptional circumstances is the requirement to ensure that sufficient land is provided to meet Warrington's development needs." The PSVLP then states that "The exceptional circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity."

As indicated above (Garden Suburb Employment Area and "Garden Villages"), WBC has not provided a sound demonstration of its development needs - in particular with regard to housing requirement. We therefore do not accept that WBC has made the case that Warrington faces "exceptional circumstances" justifying use of Green Belt land, and so we believe that WBC's proposals are consequently unsound.

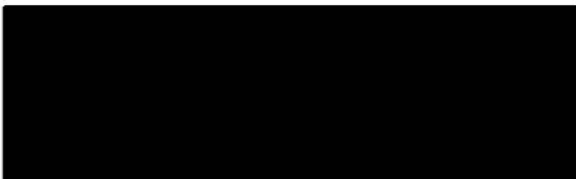
#### **Infrastructure**

With regard to PSVLP claims regarding "development of strategic infrastructure" (see Loss of Green Belt Resource, above) to address "existing issues of congestion", we would highlight:

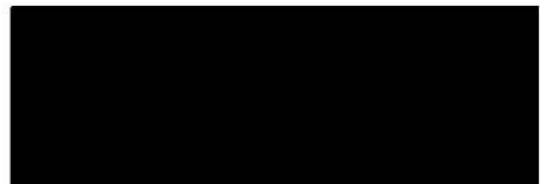
- Failure within the Plan to make adequate provision for additional crossings of the Manchester Ship Canal (MSC) for South Warrington, which – coupled with proposed increases in MSC ship movements - will inevitably result in further congestion for those travelling from South Warrington to the town centre.
- No provision within the Plan for residents of South Warrington to access the proposed (but currently poorly defined) "mass transit system", forcing increases in private car road traffic.
- Resulting negative environmental impact, including increases in emissions and noise.

It is claimed in WBC's Local Transport Plan (LTP4) that WBC seeks to avoid Warrington increasingly acting "as a commuter town for Manchester and Liverpool". It seems to us that WBC's proposals with regard to transport infrastructure do not support this objective and that they are consequently unsound.

Yours faithfully,



Dr M K Fitzgerald



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