

Response 673

Respondent Details

| Information | |
|-------------|------------|
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |

PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: Colin Morgan

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

| Contact details | |
|-----------------------------------|------------|
| Organisation name (if applicable) | [REDACTED] |
| Agent name (if applicable) | [REDACTED] |
| Address 1 | [REDACTED] |
| Address 2 | [REDACTED] |
| Postcode | [REDACTED] |
| Telephone number | [REDACTED] |

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

None of the above

3. Do you consider the Draft Local Plan is: Please select one option in each row.

| | Yes | No |
|---------------------------------------|-----|----|
| Legally Compliant | X | |
| Sound | | X |
| Compliant with the Duty to Co-operate | X | |

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

This representation challenges the justification for the current proposal within the 'Warrington Draft Local Plan Proposed Submission Version' April 2019, to extend the Omega South development across the Borough and County boundaries onto St Helens Green Belt farmland. The St Helens Draft Local Plan is also in production at the moment and is currently a just few weeks ahead of the Warrington plan in the overall process. A similar representation has also been made to challenge the justification for this proposal to St Helens in line with their Local Plan process as the St Helens report contains the detailed proposed to remove this parcel of the Bold Forest Park farmland (designed 1EA, area 30 hectares) from Green Belt.

The aim of this representation is to demonstrate that the 'extreme circumstances' case for this proposed development has not been made for a number of reasons, including challenging the estimated projection for the requirement of additional employment land over the next 20 years and by focussing attention on the inevitable significant harm from this proposed change that does not appear to have been weighed and taken into account.

A key feature of the harm that would be caused by this proposal stems from the removal of the secure Green Belt tree-lined Borough and County north-south boundary that currently effectively screens to the west the Omega South development area's recently completed warehouses. This boundary will be lost if the proposal to build any additional warehouses to the west goes ahead. Additional causes of harm to the Bold Forest Park environment itself are given below. (For example, on the St Helens side of the boundary the land is productive Green Belt farm land.) Justification for removal of land from the Green Belt is acknowledged in both the Warrington and St Helens reports as requiring 'exceptional circumstances' (in line with national policy). It is stated in the Warrington draft report that such exceptional circumstances do exist to provide the necessary justification and that this arises from Warrington's currently identified need for additional employment land over the period covered by this latest Local Plan. (St Helens Borough Council are considering this proposed Green Belt change under their duty to cooperate with adjacent boroughs such as Warrington, which I understand is subject to the same level of control and justification as would proposals initiated by St Helens Council itself.) However, I strongly disagree that the assessment provides the required grounds to justify the proposed development of this parcel of farm land. This is because need and benefit from the provision of additional warehousing on this already extensive site does not appear to provide 'exceptional circumstances', given a more realistic projected employment land requirement (as discussed below) and given any benefit from additional warehousing could be provided either within Warrington itself (at various sites identified within the report such as Appleton & Stretton Trading Estates or Woolston Grange), or elsewhere in the region at several sites with which Warrington are currently in competition e.g. Wigan and Liverpool. In addition to a lack of 'exceptional circumstances' creating a need for this land to be considered, there is the fact that there are already problems with congestion and pollution in this part of Warrington and the town as a whole and the additional diesel fuelled traffic (lorries and cars) will add further to this by a further extension to Omega South. On top of this, if the amount of harm that will result to the Bold Forest Park area is weighed against any anticipated benefits, there appears to be no viable justification for this proposal to put warehousing on Bold Forest Park Green Belt land.

The overall thrust of the Warrington Local Plan has been based on a high level of growth in Warrington – described as 'aspirational' in the report - that its authors say is ambitious. This level of ambition for high growth perhaps arose when Warrington was hoping to develop rapidly to become one of the 'Northern Powerhouse' cities. This idea now appears to have been abandoned – one reason being, it was not in generally keeping with the wishes of those that reside in the town. However, elements of this ambition seem to have been carried forward into this latest Local Plan. Whilst it is good that Warrington is being developed to exploit its excellent position on the crossroads between Manchester and Liverpool, it is hoped that this will be balanced with the effects on the quality of life of those that already live and work here. The infrastructure in Warrington is being progressively developed but is always struggling to cope against the inherent geography e.g. being cut in half by the Ship Canal, and is many years behind where it needs to be such that the population already suffers inconvenience, delays and high levels of traffic pollution. There is the danger that the ambition of the report introduces a cycle of higher residential growth feeding a need for additional employment, which in turns requires further housing in an impractical never-ending upward spiral. Hopefully, the plan as approved have been throttled back such that the need for employment land is set a level that better benefits the long-term well-being of the town and its people.

Looking at the figures used to calculate the projected employment land requirement, the Economic Development Needs Assessment Update (specifically, Table ES1), shows that the method for calculating the projected employment land requirement is based on the historic strategic and local land take-up rate from the last 22 years, with an additional five years being added to the 20 year period being considered. The resultant figure for projected employment land shortfall is 7 times higher than that calculated by looking at a model based on projected economic growth employment figures, and still 4 times higher than these figures once the latter have been modified to add in potential strategic growth. However, the assessment then chooses to adopt the historic figures in their entirety, without further consideration of actual likely current economic growth needs. This would be expected to give a highly exaggerated requirement for employment land needs into the future since much of the historic increase has occurred from the one-off opportunity of Omega resulting from the development of the extensive Burtonwood Aerodrome site, which is a one-off and not repeatable (Figures from EDNA Update Table 22). Surely, given the two methods shown in the EDNA Update report produce such different answers, there should have been a more sophisticated approach used looking at a combination of the historic and economic factors? This would have been expected to result in a projected requirement for employment land somewhere between the two extremes predicted by the two methods used.

Taking and using the highest figure calculated does not seem justified from the current economic modelling and remaining land availability and then this results in the potential for a significant exaggeration of the need for future employment land that affects all the other arguments, such as the amount of Green Belt land that would need to be released. In addition, other considerations, such that at the infrastructure of Warrington is struggling to cope with the current level of activity, let alone further significant increases, should also have been taken into account when considering the modelling of future growth potential? Since 84 ha of available employment land was identified in the report, any reduction in projected land requirement would make the argument for the need to include additional St Helens Green Belt land hard to justify, especially given the level of harm that would result to this Bold Forest Park environment, against use of available land elsewhere.

A recommendation in the revised EDNA says: "Wigan has growth plans along the A580 East Lancs Road, particularly if growth plans in the GMSF are realised. To avoid overlapping and competition, large scale B-Class development in rural areas of Warrington Borough, north of the M62, is not recommended". Since this proposed Omega South west development is situated right against the M62 – surely this would suggest that developing additional warehousing on this farmland cannot be justified?

In addition, the EDNA Update says "A strategic only scenario is not considered as it would only be based on a short period (five years) of intense recent take up at Omega that may not reflect real future demand across the next 20 years." This means that the contribution from strategic growth should not be included for every year when calculating the average as it does in the EDNA. The EDNA contains a justification for taking the highest employment land projections by looking at the historic and the economic growth methods, and then comparing them with what happened over intervals in the past – i.e. looking at the history – therefore, not surprisingly the historic method seems to give a more appropriate answer. However, this is tautological and so is not a valid argument. From the employment land use figures, it can be seen that what is deemed strategic use is caused by the massive Omega development to date. This distorts the picture and was a one-off opportunity for growth in terms of land availability. Therefore, the estimate of employment land requirements is likely to be too high, removing any 'extreme circumstances' justification for the proposed removal of farmland from St Helens Green Belt.

In addition to the argument against the projected level of employment required being based solely on historic data because of the changing circumstances, there is a further argument from this St Helens Green Belt area under consideration being comparatively small so that a disproportionate amount of harm is done for any potential benefit. In the report, based on the aspirational high level of growth as discussed above, the estimated employment land required from Green Belt is approximately an additional 200 hectares over the plan period. In the report it states that there is a 20% margin on this figure, to give an additional five-year buffer over the twenty years being considered. Since 20% of 200 ha is 40 ha, the proposed extension of Omega into the St Helens Green Belt at 30 hectares is less than this quoted margin and only 11% of the total requirement as claimed in the report of 277 ha. Surely, this means that any argument of 'exceptional circumstances' for this change cannot have much weight as the area of this Green Belt farmland is small and less than the margin on the quoted figure and therefore cannot be said to be vital to the overall future Local Plan for Warrington? If this change involved negligible harm to the Bold Forest Park environment and St Helens Green Belt then it could perhaps be justified as a 'nice to have', but there is a significant impact to the Green Belt boundary and to the environment, as given below.

A further argument against there being 'exceptional circumstances' for the levels of additional employment land for Warrington over the period of the Plan is that there is currently a net in-flow of 14,000 commuters per day – people who travel into the Borough of Warrington to work from surrounding areas greatly outweigh those who travel out. From this, it appears, that there is more than sufficient employment within Warrington at present, and even a significant buffer into the future.

In addition, the Warrington report says that any further development of Omega South to the west would be subject to meeting the transport limitations imposed by the M62 Jn 8 capacity. This junction has already been extensively and expensively modified to cope with the currently projected increases in traffic resulting from on-going development of the Warrington Omega site and other congestion such as that from the nearby Gemini retail park. The surrounding local roads are already under strain from the current and proposed Omega development on land within Warrington. In terms of the effect on traffic, this expansion is far from complete, despite what it says in the report, as there are about a thousand more houses yet to be occupied plus other significant employment development (anticipated to be warehouses) on a large area at the eastern end of the site. The additional traffic from any development on the St Helens side would add to both the traffic burden both locally and at the motorway junction as all the traffic would be taken by Warrington roads. Pollution in the area from diesel fumes would also be further increased.

A further argument against the justification of the proposed future development of Omega west into St Helens is that, if 'extreme circumstances' prevail for the creation of employment land within Warrington, why is so much of the potential employment development land at Omega being given up for housing development? This seems a non-ideal location for housing because of its proximity to the Omega warehouses, with no buffer zone of smaller buildings such as offices in between, inherent traffic pollution and noise, and the closeness of the M62. Recent development has taken place very rapidly, both of warehousing and the vast tracts of Omega land being set aside for housing, rather than a more measured approach being taken that could have allowed a higher density and quality of employment land use for the people of Warrington. The Omega site was (and even remains today) a vast undeveloped area with the potential to evolve over time in a similar manner to the successful Birchwood Science Park on the other side of the town, but the decision seems to have been taken in the prevailing economic climate to develop the site with warehousing and residential estates to the detriment of higher density, if longer term, employment opportunities. Therefore, the justification for the proposal to develop the Green Belt farmland 1EA site is surely further weakened by the decisions made to use the Warrington Omega land for housing and warehousing?

Another consideration is that the Warrington report, as it stands, does not include the vast Fiddler's Ferry power station site within its future potential employment land allocation. This is despite the fact that power generation there is likely to come to an end by 2025 at the latest – so the current plant will be demolished during the 20-year period of the plan, providing employment, and the area become available for redevelopment. The power station already operates only intermittently and it seems likely that parts of this site could readily be utilised in the near future for additional employment within the Warrington area. This site has the significant advantages of direct connection to the National Grid network, a bespoke railway line and proximity to the river. The UK is currently short of installed power generation and this site therefore has the potential to be developed to provide power of a more environmentally acceptable manner into the future. It is hard to understand how it can be justified not to include this site at all in the future Warrington employment land allocation and yet to insist that there is a need to takeover Green Belt farmland from the Bold Forest Park for a further extension of lorry-serviced warehousing close to Warrington?

The Warrington Local Plan makes it clear that pollution in the town is already a serious problem, with air pollution from vehicles contributing significantly to deaths. It therefore seems intolerable that the Council's aim is to significantly increase traffic in the town, including the Great Sankey area, as an inevitable result of the high level of proposed further development. Having three young grandchildren growing up in the existing houses adjacent to the Omega development, I am concerned about traffic pollution levels from the ever-increasing diesel traffic. The proposed extension of Omega South west into St Helens compounds this for those who live in the area.

Whilst it says in the Warrington supporting documentation (e.g. in the Responding to Representations Report on the previous Draft report) that "Exceptional circumstances can also be demonstrated for each area of Green Belt release" no such demonstration is made in the document about the St Helens parcel of land other than the general statement; "The starting point for Warrington's exceptional circumstances is the requirement to ensure that sufficient land is provided to meet the Council's development needs and economic aspirations. 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." This general statement does not provide any explanation as to why an extension of Omega onto St Helens Green Belt farmland is justified, or mention any argument of potential for benefit gained over the obvious harm that would result in this case were it to be allowed.

Turning now to an outline of the harm that would result from the proposed warehouse development following removal of the area 1EA from Green Belt: This farmland is currently part of the Bold Forest Park area and comprises two large fields behind a solid and effective Green Belt boundary. The boundary that would be breached consists of an effective line of tall trees that hide the recently constructed Omega South warehouses from the surrounding St Helens countryside. If warehouses were to be built on these 30 hectares, they would be visible for miles around as the suggested new Green Belt boundary would consist of a drainage ditch that provides no visual barrier. The land towards the southern end of the 1EA parcel rises slightly above the surrounding Bold Forest Park field level and this would make any development even more prominent in the landscape.

In addition, the two fields that comprise the parcel of land 1EA currently act as a buffer between the Omega South warehousing and the boundary of the ancient deer park that is in the central area of Bold Forest Park. This designated area was the subject of extensive work by St Helens Council and the subject of an Area Action Plan (AAP) to help the local population to gain additional benefits from its environmental features and parkland and to protect and further enhance the area to the south of St Helens town. This AAP was signed off in 2017 and the intentions for future protection and environmental enhancement of the area were set out in detail. This area of farmland is superior in appearance to that usually found in this part of Cheshire and Merseyside as the landscape consists of a mixture of fields under cultivation enhanced by tracts of mature woodland (protected by TPOs), a stream and wildlife ponds. It seems that these areas of woodland have been present in the landscape for at least two hundred years as, from looking at old maps, it appears they were set out as part of the Bold New Hall driveway in the 1740s. The farmland in this part of Bold Forest Park is of good quality – the fields adjacent to the 1EA parcel are currently growing potatoes and are farmed throughout the year to provide a variety of crops. In terms of wildlife in the area, whilst I am not an expert bird-watcher I have counted over forty different species of birds, and have also seen bats, hares, hedgehogs, mice, shrews and foxes. The noise, light pollution, and disturbance that would be caused by this proposed development would blight this landscape and disturb the remainder of the Bold Forest Park to the west. If development of the area across this boundary were allowed, there would be no going back, and this rural edge of St Helens would be lost forever.

To summarise, the future employment land area numbers proposed in the Warrington Local Plan are based on an increased level of activity that is described as aspirational and calculated using a method that maximises the projected need and, therefore, appears unsupportable following the historic distortion of the one-off development of the vast Omega site. In addition, account is not taken that there are other many areas in Warrington and the local region that are actively competing to develop warehousing. This proposed change could provide only a small benefit to Warrington employment as the total area of 30 hectares is even smaller than the contingency on the projected future land requirement from Green Belt as given in the plan, and the intended use is low employment density warehousing. Also, the Warrington plan does not appear to mention or take into account the net influx of workers into Warrington each day or currently include a contribution to future employment land allocation from the vast Fiddler's Ferry power station site. Set against this is the loss of a strong, sound, long-established and effective Green Belt boundary, loss of good farmland, loss of a buffer to established mature woodland and parkland, and the blighting with warehousing of a landscape picked out by the St Helens authorities for special environmental consideration and its recreational potential. There is no attempt in the report to argue that the benefit from the addition warehousing at this location would in any way outweigh the harm done to the Bold Forest Park by this proposed development. In conclusion, I feel that the case for 'exceptional circumstances', as required by the NFFPA for this parcel of land to be developed as suggested, has not been made and, therefore, given the losses that would be incurred and harm that would be done, the proposal to remove these 30 hectares from Green Belt has not been justified and that the request to St Helens for this change to their Green Belt boundary should be rescinded.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of the references to the proposed Omega South western extension onto St Helens Green Belt land, as mentioned in the main report Section 3.3.2.1, 3.4.6, Table 6, 4.2.16, 5.1.7 et al.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination (I understand details from Part A will be used for contact purposes)

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To answer any questions that the Inspector may have on my submission, should this be deemed necessary.

You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now?
Please select one option.

Complete the rest of the survey (Part C)