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Warrington Local Plan Examination in Public	
Representor/Number	South Warrington Parish Councils/0450
Document Title	Hearing Statement – matter 3 Spatial Strategy
Version/Date	V1 18 July 2022
GTP ref	2203012
Site	Whole Plan

1 Introduction

1.1 Groves Town Planning has been engaged to represent the South Warrington Parish Council's Local Plan Working Group (SWP) since April 2018 at which time the Preferred Development Option of the Council had been published.

1.2 The SWP has consistently argued that the focus of development and key aspects of the spatial strategy are wrong.

1.3 The approach which sees the spread of the urban area into irreplaceable Green Belt is driven solely by the wish of developers to exploit the strategic location of the Borough on the national motorway network and to build high value housing within the North Cheshire Green Belt.

1.4 This approach will be at a cost to urban regeneration and contrary to the stated objectives of the Council will direct resources away from those parts of Warrington with the highest levels of deprivation increasing rather than decreasing inequalities

1.5 The extensive development proposed on allocated sites demands unrealistic and undeliverable levels of new infrastructure. The development will result in unacceptable levels of road based traffic on an already congested network; development is not sustainable

2 Housing

2.1 The SWP has consistently raised concern that housing numbers contained within the plan are based on expected levels of employment growth. Response to matter 5 will

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illustrate the challenge to the basis for these figures which has been consistently presented but largely ignored.

2.2 It has been accepted that the Council has attempted to prepare a plan over a period of considerable and unprecedented change including Brexit, the Covid Pandemic, climate change and the status of major infrastructure projects including HS2 and Northern Powerhouse Rail. The impact of development across the sub region is poorly considered and the regional plans for the neighbouring conurbations are not properly assessed.

2.3 Levels of growth are overstated and result in housing supply figures which only reflect that level of growth. It is acknowledged that national guidance advocates plans which aspire to deliver growth, but not without consideration of wider issues. The planning process is of

no value if unfettered growth is simply accepted irrespective of cost.

2.4 The SWP representation to the 2021 PSV can be summarised as follows. (section 8 page 44)

- Use of 2014 housing projections is increasingly inconsistent with later trends
- ONS figures for 2018 would produce a substantially smaller requirement of 458 dpa compared with the 816 dpa of the plan. As an illustration of the level of uncertainty of projection the Council was promoting a figure of 945 dpa in the 2019 PSV and 1113 dpa in the 2017 PDO
- There is a disconnection between the levels of housing proposed for South Warrington and the expectation of population growth related to the

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form of employment development envisaged for the South Warrington Employment allocation.

- There is no historic precedent for housing delivery rates at the levels predicted in the trajectory precedent by the Council in the PSV. The only time that such levels were approached was in the 2000's when directives limited the scope for development of green field and prompted the development of several brown field sites in the centre of Warrington, available as traditional manufacturing industries moved to reflect global market conditions.
- Delivery rates are controlled by developers who in turn respond to market conditions. There is historic precedent for developers to manage the release of sites in South Warrington on the basis the wish to

avoid over supply and reduction in values in a competitive market.

- The pattern and form of development in Warrington heavily reflects that established by the New Town Development Corporation in the 1960's. In many respects the 2022 PSV seeks to repeat a plan which met with criticism and failed to come to fruition four decades ago.
- In no small part it was the inability to deliver the scale and form of infrastructure required to serve large scale development in South Warrington which prevented the implementation of the New Town Master Plan.
- The emerging plan contains no clarity as to how land within allocated sites will be released across the plan period so as to avoid front loading with

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development of easier to development green field sites and reluctance to focus on more complex site within the urban area.

2.5 It is apparent that neighbouring authorities are in different positions in terms of housing allocation and housing supply than they were at the time of preparation of much of the evidence base used in preparation of the plan.

2.6 The 2021 Housing Delivery Test measurements show the following levels of delivery:

Cheshire East 300%

Cheshire West 340%

Halton 196%

Knowsley 410%

Manchester 169%

Salford 287%

St Helens 187%

Stockport 92%

Trafford 79%

Warrington 72%

Wigan 174%

2.7 SWP has raised concern over the provisions of the emerging plan in terms of ultimate housing numbers for the South East Warrington Urban Extension. The delivery of required infrastructure appears to rely on the completion of the complete allocation for residential development, yet other parts of the policy establish a clear commitment to limit development across the plan period to a smaller number. There is no mechanism indicated to ensure that the full take up of development allocated takes place before the end of the plan period.

3 Outlying settlements

3.1 There is no clear rationale in the approach taken to development in outlying settlements.

3.2 For the SWP this relates mostly to development in Lymm. Concern over the rationale of including development in Lymm is covered in separate hearing statements relating to those sites under matter 7d

4 Land adjacent to the main urban area

4.1 It is the view of the SWP that SEWUE was selected as a site because of its ownership and control via Homes England. This to some extent implies scope for more immediate delivery.

4.2 This simple approach reflects the legacy of the uncompleted New Town Master Plan and has effectively been brought forward without consideration for changes in circumstances, including adoption of the North Cheshire

Green Belt through the Warrington UDP, changes to the approach to development based solely on access to the private car, the opening the M56 and a range of socio-political changes

4.3 It has consistently been a matter of concern that this over simplistic approach has been reflected in a propensity to understate the value of the land allocated in terms of Green Belt and to make assumptions about the capacity of the land for development without proper regard to infrastructure provisions.

4.4 The manner in which Green Belt assessment has parcelled areas of land will mean that only parcels which share a boundary with the existing urban area are recorded as having impact on urban sprawl. Areas away from the existing Urban Area are recorded as have a lesser impact on the purposes of the Green Belt.

4.5 Comment on individual allocated sites will consider the paucity of infrastructure provision, particularly in terms of the highway network, the failure to address recognised issues with existing network, particularly having regard to dependence on 3 crossings of the Manchester Ship Canal via Victorian Swing bridges.

4.6 Proposals for additional crossings are vague and incomplete and appear poorly costed. The spatial strategy relies on a proposal for an additional high level bridge with limited information of routing from the site allocations and apparently depositing traffic on the existing highway network in Latchford.

4.7 It can only be a result of a lack of awareness that communities in Latchford and Westy and their elected representatives have not been more vociferous in expressing concern over such provision

4.8 As it stands the proposed development to the South of the Ship Canal will rely on access to the wider network via the A49 corridor, the A56 and Lumbrook Road. Each of these routes include the use of congested junctions, restricted canal and Ship Canal Crossings. This all takes place a network prone to the regular pressures of obstruction and closer of the M6 and the M56.

4.9 It is contended that the decision to allocated land in the Green Belt south of the Ship Canal has not be tested adequately in terms of the Sustainability Appraisal. There has been inadequate assessment of the impact of the sustainability of large scale development based almost entirely on the use of the private car.

4.10 There has been adequate assessment of the impact of increased traffic flows on air quality. This will be highlighted in consideration of matter 13 particularly in

terms of issue with the impact of increasing particulate levels in Stockton Heath.

4.11 It is difficult to see where the provisions of Paragraph 142 of the NPPF – offsetting the impact of removing land from the Green Belt through compensatory improvements are covered in the Plan

4.12 The spatial strategy having regard to housing development is considered to be flawed, undeliverable and therefore unsound in terms of housing provision

5 Employment Land

5.1 Many of the issues pertaining to the release of Green Belt for housing also relate to the release of Green Belt for housing.

5.2 The basis for calculating employment land requirements appears to be exclusively driven by developer

requirements. Consideration of demand has been taken from the Strategic Plan of the LEP, translated in similar terms by Warrington & Co the Council's development arm. In both cases the bodies agreeing levels of demand are led or influenced by parties with a vested interest in the development sector including those with a direct interest in land now proposed to be released from the Green Belt.

5.3 It is of course entirely appropriate for the development sector to have input into the formulation of planning policy, but in the case of the 2021 PSV and some recent development management decisions the content of the EDNA which forms the basis for justification for the scale of employment land required has not been subject to any significant scrutiny or challenge.

5.4 It is worthy of note that planning application for the development of all of the SEWA are already in the process

of determination. It is accepted that this may be interpreted as representing latent demand particularly for logistics based development, but it may also be concluded that the land release in this case is simply a reflection of existing control or optional control over land which is attractive because it is green field and much easier to development and market.

5.5 Review of other representations suggests that there is significant challenge to the efficacy of the EDNA and as such it should not be taken as read that the release of land for the SE Warrington Employment Area is justified. There is no evidence that the restrictions identified in Green Belt assessment have been fed into the EDNA to justify wholesale release of the SEWA.

5.6 Appleton Thorn would lose all identity as an independent settlement and would be subsumed by the scale and form of the employment development.

6 The overall approach to infrastructure

6.1 Section 11 of the SWP representation provides for a comprehensive assessment of the approach to infrastructure and its fitness to ensure delivery and therefore the soundness of the plan.

6.2 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.

6.3 The ability to deliver the required infrastructure to properly serve the development allocations is doubted. There is insufficient certainty over the timely delivery of transport, education and health infrastructure. Routes and sites are ill defined. The wider consenting processes needed are unclear and in many cases lie outside the Council's direct control.

6.4 This is a critical and fundamental concern. A significant proportion of the Plan is based on the 'unlocking' ability of infrastructure. However this infrastructure is predicated on funding derived from development which is often not due to come forward until after the Plan Period.

6.5 This inherent contradiction places in serious doubt the ability of the Plan to deliver much of the proposed employment and housing over the Plan Period.

6.6 This central failure of the Plan to be deliverable, and thus not be effective and therefore not sound, is not adequately recognised or addressed by the Council. This is deeply concerning and alone necessitates a re-think in the overarching strategy of the Plan.

6.7 The Plan makes numerous assumptions and predictions about the impact of proposed rail infrastructure. There is no certainty or evidence to support the delivery of such provision within the Plan period. If certainty emerges, the Plan as presented would seem likely to conflict with many of the potential options for connection to HS2 and the location of Northern Powerhouse Rail. The decision not to build the Golborne link is potentially damaging to Warrington as it leaves the issue of restriction and capacity between Crewe and Warrington unresolved.

6.8 The fact that the Integrated Rail Plan retains an option for a Daresbury Interchange between the WCML and NPR should be a matter of concern both in terms of infrastructure serving Warrington and the reliance on Bank Quay providing such interchanged facilities.

7 Viability

7.1 The Submission Draft proposes large scale development which will only operate successfully if a comprehensive range of infrastructure is in place. The mechanics for funding such levels of infrastructure lack clarity and certainty necessary to commit to the allocation of such levels of development.

7.2 The PSV21 notes that delivery is dependent on the completion of development proposed to take place beyond the planned period.

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

7.4 The Plan and evidence base fail to provide necessary certainty over costs. The IDP does not include consideration of all development costs, including sustainable utility provision, affordable housing, the high levels of energy efficiency demanded by plan policy. It is impossible to fully assess and to interrogate the viability of passing these costs onto developers through planning obligations

7.5 The LTP4 was presented in parallel to the Submission Draft of so as to demonstrate the level of infrastructure needed

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to support the development proposed. The LTP has not been updated to reflect changing circumstances. It contains flaws and unsubstantiated assumptions which bring into doubt the ability to match development with infrastructure provision.

8 Conclusion

8.1 It is considered that overall the spatial strategy is not sound as the evidence base on which need is assessed is flawed and because the infrastructure required to enable the development proposed to work effectively is neither sustainable or viable.