



# Groves Town

## Planning LTD

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<b>Warrington Local Plan Examination in Public</b>	
<b>Representor/Number</b>	South Warrington Parish Councils
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### 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.

### 2 Key areas of concern

2.1 The Borough Council published an Economic Development Needs Assessment Update produced by Mickledore and BE Group in February 2019. A refresh of this documentation has been produced in by BE Group in August 2021. It is of concern that the August 2021 refresh considered the 2019 version of the NPPF despite that being superseded by the July 2021 NPPF at the time of its publication.

2.2 It is noted that most of the background papers for the PSV21 were produced simultaneously in August and September 2021 – days before the publication of the PSV for the WBC Cabinet meeting on 13 September 2021. The degree to which the EDNA has been properly taken into account in the production of other documents in the evidence base must be questioned.

2.3 It is noticeable that the Cheshire and Warrington LEP Strategic Economic Plan is less prominently referenced than in PSV2019. The SWP welcomes this approach in the light of previous criticism by SWP that the SEP was excessively aspirational, promotional and increasingly unsupported as economic and social/political context has dramatically changed.

2.4 It is clear however that the assessment still relies on a growth scenario based on the assumption that ambitious

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development plans and allocations will of themselves generate economic activity.

2.5 Critically for Warrington the Assessment 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 continued reference to the LEP Strategic Economic Plan Jobs Growth Scenario in predicting growth.

- Logistics land requirements driven by proximity to motorway junctions.

- Variation in forecasts from alternative providers and disregard of options based on those forecasts. Some appraisals prior to the production of the Preferred Developments Option in 2017 were suggesting growth levels of between 15% and 20% assessing patterns in GVA growth against the aspirations of the Local Enterprise Partnership (LEP) Strategic Economic Plan.

2.6 The SWP remains concerned that the approach taken to the consideration of growth is unreliable and unrealistic. It is acknowledged as being underpinned by the

unsubstantiated and business driven expectations of the LEP Strategic Economic Plan (SEP). This body is not democratically accountable and is led by business interests with direct involvement in land released for development on back of the Needs Assessment. This concern is reinforced by the evidence of different assessments with different conclusions as to levels of growth produced.

2.7 7.7 This position is repeated with the evidence base for the 2021 PSV with two assessments producing two different forecasts for jobs growth. Irrespective of this position these forecasts are dismissed in the EDNA on the back of predictions based on historic growth rates and take up of employment.

2.8 It remains the contention of SWP that this approach is fundamentally flawed. Warrington has inevitably experienced, inflated, higher than average rates of growth

in this regard as result of being able to deliver shovel ready development land at Birchwood and latterly Omega. This has attracted development to Warrington and away from other locations simply on the basis of availability. It is not just Warrington's strategically beneficial location which has attracted development, but also the fact that highway and infrastructure issues had been resolved. Issues relating to ownership and planning obligations were largely already resolved. Such advantages were clear attraction for strategic planners for commercial organisations a number of which are commonly based overseas.

2.9 The introduction to the EDNA acknowledges that the research methodologies used to consider historic and predicted growth rates and therefore OAN includes key

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strategic stakeholders. Some of those stakeholders have a vested interest in promoting development and growth.

2.10 Warrington &Co is Warrington BC's development arm with a mandate to support and promote economic growth. It is also the part of the Council which has invested in and now owns and controls substantial areas of employment land in Birchwood and Appleton.

2.11 It is also clear that many sites with development potential are already in the control of developers. Langtree, Peel and Liberty have control over large parts of the areas of land which might be considered for allocation. Logically and legitimately such parties will highlight demand of employment land and the benefits of development of land in their control. It is however considered that in reality need is driven by supply. In the current market any site within a motorway corridor can be shown to be needed.

The availability of a green field site, next to a major motorway junction will inevitably attract interest and draw attention away from less strategically attractive, more difficult to develop sites.

2.12 It is understandable why Warrington would seek to maintain its status as a key destination for investment particularly around the logistics sector. However, given the high levels of employment within the Borough, there will be a need to import labour. Notwithstanding attempts to deliver a wide housing mix in new housing allocations, it seems unlikely that potential new residents so employed, would be able to relocate to South Warrington.

2.13 Evidence produced at the appeal into the Stobart distribution centre at Appleton Thorn (APP/MO655/W/19/3222603) illustrated the location of the place of residence for those employed at the existing

Stobart Depot. 60% of staff lived outside Warrington Borough. Most others lived outside South Warrington. 7.14 In contrast to the approach to development plans in other locations, the predicted levels of growth in the case of Warrington are almost entirely based on the impact of development envisaged in the plan as the key driver. There is little or no conclusive evidence as to how activity elsewhere in Cheshire will prompt growth at the levels predicted. The plan is based on aspiration rather than justified through a sound evidence base.

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

2.15 The Strategic Economic Plan was produced by the LEP in 2018. The Plan anticipated growth based on the impact of HS2 in Crewe, development of a science and technology base across East Cheshire, car and aerospace

development in West Cheshire. With the exception of additional warehousing to support an already dominant logistics base for the Warrington economy, there was no such catalyst for growth in Warrington other than its self imposed aspiration to secure “city” status, as set out in the PDO.

2.16 The period since the inception of the SEP has seen many changes. Leaving the European Union has clearly impacted on development decisions for businesses with strong European connections. Car manufacturing is controlled by Peugeot, aerospace by Airbus.

2.17 Issues with cost and debate over benefits of HS2 phase 1 has brought into question to certainty and timing of delivery of HS2 phase 2. The 2021 Integrated Rail Plan appears to promote connectivity into HS2 through the use of capacity of the Crewe – Manchester route for Northern

Powerhouse Rail from Liverpool to Manchester. This would result in a new route into Warrington from HS2 west of Knutsford connecting to an upgraded route from Warrington Bank Quay Low Level via Ditton to Liverpool. Whilst it is understood that the Government has instructed HS2 to consider routes for this connection no information is available. The IRP suggests that these elements of HS2 and NPR will not come into until the 2040's. Considerably beyond the plan period and therefore for limited relevance in terms of impact on levels of economic growth expected within the plan period.

2.18 The scale of population and household growth and increase in the number of jobs envisaged by the SEP is no longer achievable. The needs assessment based on the aspirations of the SEP and historic trends which were achieved in an entirely different economic environment are

no longer relevant. 7.20 Growth appears increasingly dependent on demand resulting from the development of the Port of Liverpool. Accommodating this growth, principally for logistics, is a key part of the emerging local plans in St Helens and Halton. The absence of analysis of competition to meet these needs from any Statement of Common Ground is an issue of concern.

2.19 Apart from figures suggesting the overall area of land required to serve this source of economic activity there is little or no evidence to demonstrate a direct relationship to logistics development in Warrington.

### 3 Conclusions

3.1 The PSV21 is purely driven by the aspiration to accommodate growth. This runs counter to the provisions of the NPPF which seeks to ensure that development is

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sustainable across economic, social and environmental objectives.

3.2 The plan is predicated on a single objective and does not balance the considerations in the manner expected by paragraphs 8 and 9 of the Framework.

3.3 If the Plan is unbalanced and is excessively catered towards an economic objective then this will mean that this Plan would not be contributing towards the objective of sustainable development (which is development which balances all three objectives in 'mutually supportive ways').

3.4 This is a fundamental legal issue as s.39 (2) of the Planning and Compulsory Purchase Act 2004 requires the local plans do this. A failure to do so would mean the Plan is legally flawed as well as being inconsistent with the test of soundness at NPPF paragraph 16a.

3.5 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.

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

3.7 The period between the PDO consultation, PSV19 and PSV21 provides ample illustration of rapid change. PSV21 is still based on the same presumptions around growth anticipated in the Cheshire and Warrington LEP Strategic Economic Plan of 2018.

3.8 There still uncertainty over the later phases of HS2. There is no realistic expectation that Northern Powerhouse Rail will reach Warrington within the plan period.

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



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3.10 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.

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