

Warrington Local Plan 2021-2038: Examination in Public

Hearing Statement by Peel L&P (Holdings) UK
Ltd (representor no. UPSVLP 0426)

Matter 6b: Main Development Area:
South East Warrington Urban
Extension

July 2022

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Client

Peel L&P (Holdings) UK Ltd

Our reference

PEEM3056

22 Jul 2022

1. Introduction

- 1.1 This Statement is prepared by Turley on behalf of Peel L&P (Holdings) UK Ltd (hereafter called 'Peel') in respect of the examination of the Warrington Local Plan 2021-2038. It provides Peel's response to the Matters, Issues and Questions ('MIQs')¹ identified by the Inspectors in respect of Matter 6b: Main Development Area: South East Warrington Urban Extension.
- 1.2 The context to Peel's representations, including its development interests in the Borough, is set out in its Matter 1 statement.
- 1.3 This Statement should be read alongside Peel's statements in relation to Matters 1, 3, 4, 6a and c, 7a, b, c and d, 8, 11 and 14. It should also be read alongside statements submitted jointly on behalf of Peel L&P (Holdings) UK Ltd and Peel Ports (representor number UPSVLP 0438) which relate specifically to Peel's land interest at Port Warrington and Warrington Waterfront.

¹ ID02

2. Matter 6b: Main Development Area: South East Warrington Urban Extension

Q3: What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?

Q4: What would be the effect of developing the site on the purposes of the Green Belt?

- 2.1 Peel considers that the impact of the development on the purposes of the Green Belt has been understated relative to that of the South West Urban Extension ('SWUE'). The development options have not been assessed on a fair and consistent basis in this regard.
- 2.2 The SWUE is presented as a development option in 3 out of the 5 spatial options considered by the Council and presented in Examination Document O1². If assessed on the same basis as the SWUE, the appraisal process would logically conclude that the South East Warrington Urban Extension ('SEWUE') has the same or greater impact on the Green Belt than the SWUE. This is detailed in paragraphs 5.16 to 5.29 of Paper 1 of Peel's 2021 representations to the UPSVLP [Document UPSVLP-0426-P1].
- 2.3 In short, this part of Peel's representation demonstrates that following the release of the SWUE from the Green Belt, the retained Green Belt gap to Moore Village in Halton will be some 800m, with a defensible boundary (in the form of Bellhouse Lane) providing the outer boundary to the SWUE in the direction of Moore Village. The Council's appraisal cites concerns regarding the narrowing of the Green Belt gap in this location (partly arising from Halton Council's decision to take Moore Village out of the Green Belt through its Local Plan) as an adverse impact of SWUE when appraising this option against others.
- 2.4 The Council has clearly placed significant weight on this relationship and been sensitive to it in appraising options, partly as Halton Council has historically raised it as a concern³.
- 2.5 In contrast, the Council's appraisal raises no equivalent concerns in relation to the impact of the SEWUE on Appleton Thorn – a village of similar size and context to Moore Village but located in Warrington. That one village is located outside of the Borough should have no bearing on the Council's objective assessment of Green Belt harm in relation to the effect of a proposed allocation on the resultant gap between the main settlement and the village in question. The appraisal of the sites should be undertaken on a consistent basis. To the extent that the Council has had due regard to the relationship between the SWUE and Moore Village in response to representations

² Paragraph 4.34 Development Options and Site Assessment Technical Report September 2021 [Examination Document O1]

³ Paragraph 3.14 of page 5 Responding to Representations Report (April 2022) [Submission Document SP6]

by Halton Council, it should do the same in respect of the relationship between the SEWUE and Appleton Thorn.

2.6 The easterly expansion of Warrington through the SEWUE will result in a narrowing of the gap between the eastern edge of Warrington and Appleton Thorn to some 350m. This is significantly narrower than the retained gap between the south western edge of Warrington and Moore Village in the context of the release of land at the SWUE. Figures 5.1 and 5.2 of Paper 1 of Peel's 2021 representations to the UPSVLP [Document UPSVLP-0426-P1] illustrate this. These are re-presented at **Appendix 1**.

2.7 No regard has been had to the impact on the Green Belt arising from a significant narrowing of the gap in this location. The Council conclude that:

*"The South East Urban Extension provides the opportunity to amend the existing Green Belt and to make use of the weakest Green Belt parcels in this location, together with the loss of some moderately performing parcels. The urban extension lends itself to the use of defensible existing features as robust boundaries, or where this is not possible, there is the opportunity to strengthen existing boundaries to ensure the permanence of revised Green Belt boundary in the long term."*⁴

2.8 It is Peel's view that this amounts to a misrepresentation of the Green Belt harm resulting from the SEWUE.

2.9 By contrast, and notwithstanding the evidence presented above and in Peel's 2021 representations to the UPSVLP, in relation to the SWUE, the Council conclude:

*"It is essential that a robust boundary is provided to support the strategic function of the Green Belt in this location in ensuring separation between Warrington and Runcorn. This needs to be considered with the potential proposed employment sites within the Waterfront and in the context of Halton proposing to remove Moore Village from the Green Belt through their Local Plan review."*⁵

2.10 Significant doubt is cast around the ability to accommodate SWUE in a manner which does not harm the Green Belt, in contrast to the positive statement regarding the SEWUE and its impact in that regard.

2.11 These conclusions do not stand up to scrutiny when their relative physical context is considered as set out above.

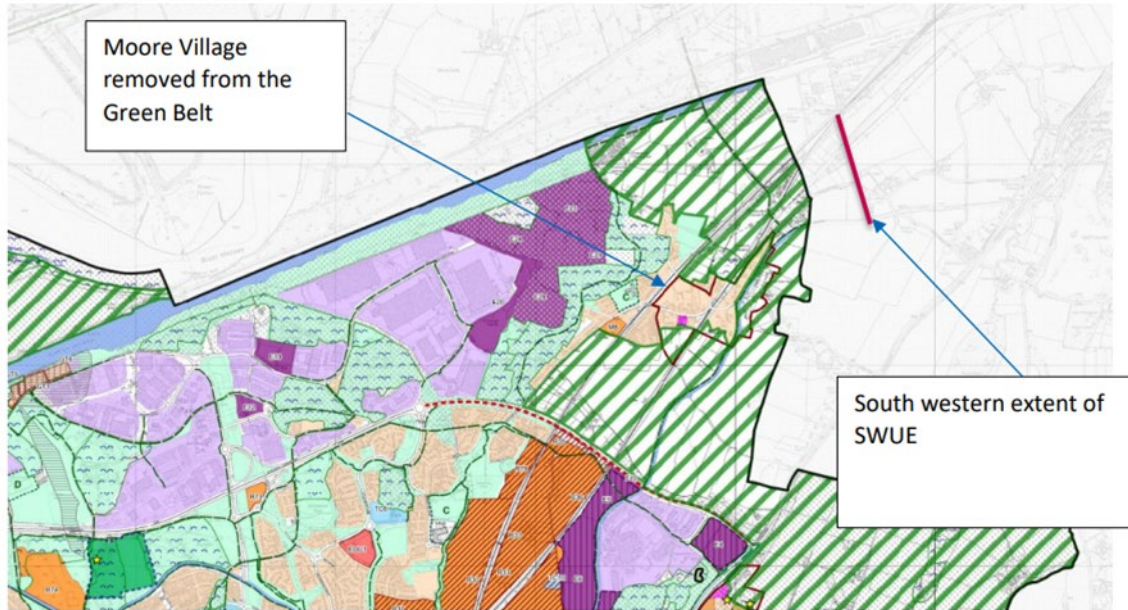
2.12 The impact of the SEWUE on the Green Belt has therefore been understated relative to that of the SWUE. It is evident that the appraisal of spatial options has not been carried out on a fair and consistent basis in this regard. To this end, the decision to allocate the SEWUE is not supported by reference to a proportionate evidence base and is not therefore justified.

⁴ Appendix 5, page 2 Development Options and Site Assessment Technical Report September 2021 [Examination Document O1]

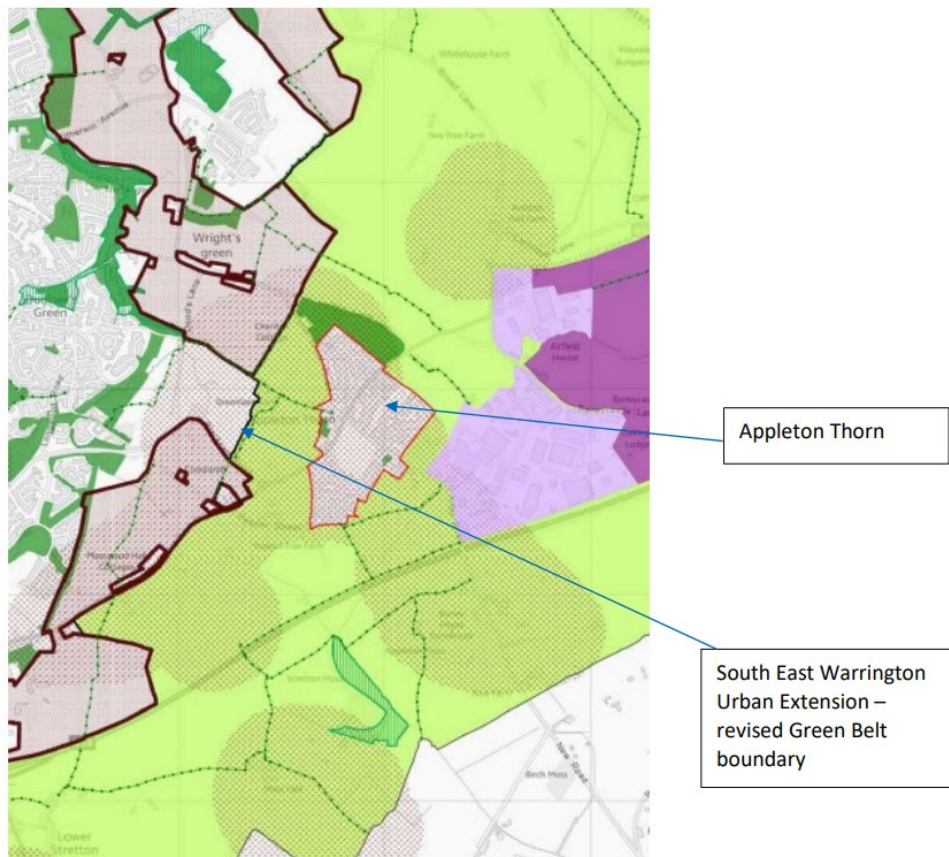
⁵ *Ibid*

**Appendix 1: SWUE and SEWUE – relationship
with Moore Village and Appleton
Thorn**

South West Urban Extension – relationship with Moore Village



South East Warrington Urban Extension – relationship with Appleton Thorn



Turley Office



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