

Warrington Local Plan EiP

Matter 6f: Main Development Area: South East Warrington Employment Area

On behalf of Taylor Wimpey, Bloor Homes, Lone Star Land and
Mulbury (Grappenhall) Limited.

Date: 22 July 2022 | Pegasus Ref: P20-3147 / R009v1 / PL

Author: ST/RD





Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	22 July 2022	RD	ST	

1. Matter 6f – Main Development Area: South East Warrington Employment Area

1.1. Each of the Inspector's questions are listed below. We comment on those where we raise matters in the representations (UPSVLP 1431) to the second Regulation 19 Warrington Local Plan (WLP) (SPI).

1.2. Our position on the South East Warrington Employment Area is set out in our representations in relation to:

- Accessibility and its isolated location (para 7.44 and para 7.66);
- Its failure to deliver suitable transport links and other sustainable transport modes (para 7.81); and
- Policy MD6 – The South East Warrington Employment Area (para 8.35 to para 8.39).

1.1. We also set out the issues with the South East Warrington Employment Area in the following:

- Matter 1: Procedural / Legal Requirements
- Matter 2: The Duty to Co-operate
- Matter 3: The Spatial Strategy

1.2. In summary, our concerns are very similar to those raised in relation to the SEWUE allocation under Matter 6b and the above matter statement. The fact that the Council have submitted a plan that does not adequately connect the largest housing allocation within the plan to the largest employment allocation in the plan, and in doing so, key infrastructure delivery as envisaged by the Local Transport Plan to encourage modal shift will not be delivered and jeopardised.

Q1. What is the background to the site allocation and how was it identified?

1.3. The land within the South East Warrington Employment Area formed part of the Garden Suburb in the first Regulation 19 WLP (PVLPI). As such, the Council did not consider the allocation until after the first Regulation 19 WLP.

1.4. The Council's consideration of the allocation is documented in Development Options and Site Assessment Technical Report (September 2021) (O1). This document notes that the land within the South East Warrington Employment Area no longer forms part of what was the wider Garden Suburb allocation and will be separated from the South East Warrington Urban Extension¹. We object to that approach and contest the Council's assertion that the required infrastructure to deliver the Garden Suburb would not be delivered in a timely

¹ O1, para 6.32

manner. Significant evidence was issued to the Council to demonstrate that this was possible but is not before the examination/Inspector.

Q2. What is the basis for the scale of development proposed and is this justified?

- 1.5. No comment.

Q3. What is the status of the site in terms of planning applications/permissions and how does this relate to the proposal and policy requirements in the Local Plan?

- 1.6. There is an undetermined Outline application (all matters reserved except for access) comprising the construction of up to 287,909m² (gross internal) of employment floorspace (Use Class B8 and ancillary B1(a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure including car parking and vehicle and pedestrian circulation, alteration of existing access road into site including works to the M6 J20 dumbbell roundabouts and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station, and ecological works (2019/34799).
- 1.7. The Secretary of State has recently written to the council exercising his powers Under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Q4. 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?

- 1.8. The same comments apply as those provided in response to **Q3 of Matter 6b: Main Development Area: South East Warrington Urban Extension.**

Q5. What would be the effect of developing the site on the purposes of the Green Belt?

- 1.9. We wait to see the Council's and respondent comments on this.

Q6. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

- 1.10. We accept there is a pressing need for more developable land within the North West and in Warrington to accommodate the continuing and growing demand for logistics floorspace and this represents an exceptional circumstance. This represents a very good employment location for logistics development and will represent the largest area of employment growth over the plan period.
- 1.11. However, our position and that of the Council's as set out in the Local Transport Plan and previous iterations of the Local Plan Sustainability Assessment, is that this employment growth site should have the ability to be connected by improved public transport infrastructure and it there is merit in ensuring additional housing growth is provided close by (as delivered by the full Garden Suburb proposals) to encourage sustainable commuting patterns.

Q7. What is the approach towards Green Belt compensatory improvements? Is this sufficiently clear?

- 1.12. It is unclear how the proposal seeks to address this matter. In contrast, the Garden Suburb proposal was able to address this through the delivery of an extensive Country Park and Taylor Wimpey also control land that was offered to the Council to provide compensatory measures to the west of the M6 and north of the land that is north of Cliff Lane (see ownership plan at Appendix 1 of our Regulation 19 representations).

Q8. What is the basis for the scale and types of uses envisaged? Should Policy MD6 be clearer as to the mix and scale of different uses?

- 1.13. No comment.

Q9. What are the implications in terms of employment land/floorspace provision and overall jobs growth? How would this contribute to employment land requirements/jobs growth outside of the Borough and what cross boundary issues does this raise? How have such issues been addressed?

- 1.14. As we have highlighted in our Matter 5 statement, the amount of jobs growth that will be achieved principally by this employment site and other employment land in the Borough warrants an increase in housing requirements to ensure sustainable commuting patterns occur and we have advocated 945 dwellings per annum (but this could be raised above 1,000 dwellings per annum). In not providing a sufficient number of homes, the burden to provide new homes for the jobs created will be passed on to surrounding authorities which have or are in the process of releasing Green Belt land to meet their own housing needs.

Q10. What is the background to the specific policy requirements in Policy MD6? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?

- 1.15. We wait to see the Council's and respondent comments on this.

Q11. Does Policy MD6 identify all appropriate and necessary highways and other infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?

- 1.16. Whilst the document also notes that the Council have taken this into account in the assessment of both the residential and employment allocations, and engaged with Highways England to ensure that appropriate improvements can be made to the strategic road network to support the development², it has not been document that the Council have given any consideration to the fact that it is an isolated employment area that will fail to deliver:

- An east west link between the A49 and A50, which can only be delivered by the former Garden Suburb – that link is required to provide scope for a Mass Transit

² O1, para 6.32 and 6.33

Route for this part of Warrington, which is clearly set out as a policy objective in the adopted Local Transport Plan 4 (LTP4).

- A park and ride facility, which is another indicated aspiration in LTP4 for the area.

- 1.17. These matters should have been considered by the Council in their consideration of the South East Warrington Employment Area, since both would assist in a modal shift, which is relied upon in the Council's transport evidence base.
- 1.18. These policy objectives of LTP4 can only be provided through the former Garden Suburb allocation or through our alternative Option that releases land up to Broad Lane and safeguards land between Broad Lane and the A50.
- 1.19. Furthermore, the Statement of Common Ground between Warrington Borough Council and National Highways (March 2022) (**SP11**) notes that the Council are continuing to work with National Highways to ensure there is a full understanding of the impact of the proposed South East Warrington Urban Extension and South East Warrington Employment Area (both cumulative and individual) and to agree the detail of the required mitigation measures³. As such, it yet to be demonstrated that improvements at Junction 20 of the M6, which is a policy requirement, can be achieved without land north of Cliff Road, which was within the former Garden Suburb allocation, could facilitate improvements and widening to Cliff Lane, and be used for the park and ride facility, employment use and/or other complementary roadside uses. The land north of Cliff Lane is controlled by Taylor Wimpey under their wider land option agreement and family members of the freehold.

Q12. Have environmental impacts, including air quality matters and landscape and visual effects, been adequately considered and addressed?

- 1.20. No comment.

Q13. Does the Policy adequately provide for the assessment of in-combination impacts on important ecological features that may arise as a result of this and other allocations within the Local Plan?

- 1.21. No comment.

Q14. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations

- 1.22. The proposal considered alone and outside of the wider Garden suburb proposals will not promote modal shift to public transport in the short or long term due to omissions cited under Q11.

Q15. Is the development proposed viable and deliverable as anticipated within the plan period? What is the situation in relation to land ownership and developer interest?

³ SP11, para. 4.3.7

- 1.23. We wait to see the Council's and developer's comments on this and refer back to our response at paragraph 1.20 above.

Q16. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?

- 1.24. Comprehensive delivery of the required infrastructure advocated in the LTP to deliver suitable connections and public transport provision to the site is not possible without the land included as part of the original Garden Suburb proposals, including land controlled by this consortia.

Q17. Are any main modifications necessary for soundness?

- 1.25. Main modifications are necessary for soundness. The allocation should be removed from the WLP (along with the South East Warrington Urban Extension) and replaced with the Garden Suburb proposals, or our Option 2 (see Appendix 3E of our Regulation 19 representations).

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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