



Groves Town

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1 Introduction

1.1 I am John Groves. I am a chartered town planner and member of the Royal Town Planning Institute.

1.2 My statement sets out to consider the following issues

- To demonstrate the true scale and form of the development
- To consider the impact that the grant of planning permission would have on the plan led process which is meant to govern and manage development.
- To consider the role of the Green Belt in the location of the application both in terms of strategic significance and in terms of character and appearance.
- To challenge the basis for the contention made by the applicant that very special circumstances outweigh harm to the Green Belt and any other harm.
- To note the extent and nature of harm which would accrue from the proposed development.

1.3 My proof is necessarily lengthy covering issues presented in a number of separate proofs by the applicants witnesses. This summary proof therefore provides only headline points rather than a summary of every matter raised.

2 Key policy considerations

2.1 The suggested form of the statement of common ground prepared by the applicant prevented sign up and agreement to its content from SWP.

2.2 There was however no specific disagreement with the key elements of national guidance and policy or with the policies of the development plan which would be

considered to be of relevance to the consideration and determination of this appeal.

2.3 There is dispute over the weight which can be afforded to the policies of the emerging development plan as outlined below.

3 Understanding the nature and scale of the proposed development

3.1 In reality the proposed development represents the largest single development proposal on an unallocated site in Warrington.

3.2 The site measures 98ha (43 Hallelwell Jones rugby stadia, stands and all).

3.3 The existing area of the Stretton Airfield and Barleycastle Industrial estates combined is 70ha.

3.4 The site sits at one of the highest points in Warrington at 67m AOD.

3.5 Submissions suggest that at least 148 HGVs will enter and leave the site in an hour.

3.6 It is proposed that there will be 2400 car parking spaces on the site.

4 Case for South Warrington Parish Council's objection to the proposed development

4.1 My proof will focus on two areas which demonstrate that the development cannot be considered to be sustainable in the terms set out within the NPPF

4.2 I it will be shown how the grant of planning permission would be premature to the outcome of the process of adoption of the emerging Warrington Local Plan. This would justify refusal on prematurity grounds alone.

4.3 Secondly, it is acknowledged by all parties that the development is inappropriate development within the Green Belt. The applicant claims that very special circumstances clearly outweigh harm by reason of inappropriateness and any other harm. This is not the case and that any benefit of the proposed development – the very special circumstances claimed by the applicant, are outweighed by

definitional harm, harm to the purposes and objectives of Green Belt designation, harm to the character and appearance of the Green Belt and harm to a range of other issues.

5 Prematurity

5.1 Paragraphs 49 and 50 of the NPPF which consider the scope or perhaps limitations on the scope to consider that the determination of a planning application will be premature to the consideration of a development plan.

5.2 The development must be so substantial that to grant planning permission undermines the plan making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan.

5.3 Secondly, prematurity can only apply where the relevant emerging plan is at an advanced stage.

5.4 There can be no argument about the significance of the development or a conclusion that it should be considered as substantial.

5.5 At the stage of preparation of this proof the emerging Warrington Local Plan has been through an examination.

6 Economic benefits and meeting economic needs

6.1 To consider whether 'very special circumstances' exist, I first need to consider the purported benefits associated with the proposed development. It is these benefits that must 'clearly outweigh' the harms.

6.2 I recognise that this is the primary basis on which the applicant claims that very special circumstances can outweigh harm to the Green Belt and other material considerations.

6.3 Need

6.4 I consider that the basis of the need for the development is overstated and relates to exaggeration of the benefits which are alleged by the application to outweigh the considerable harm which results from the development.

6.5 In the Inspectors' letter of 6 December 2022 which outlined initial findings post examination the following observation was noted that the case for need for the allocation had not been made.

Economic benefit

6.6 A useful illustration of the level of uncertainty of benefit is illustrated in the Director of Growth's report to the Development Management Committee in March 2022.

6.7 I am uncertain as to the scale of benefit and the direct relationship of a specific development with the deprived wards of Warrington.

6.8 It is my contention that without challenge to the exact numbers produced, the true level of benefit resulting from the proposed development should be viewed with caution.

7 Harm

Impact on the Green Belt

7.1 There are three potential 'harms' to the Green Belt. Definitional harm due to the proposal being inappropriate development, Actual harms in terms of harm to openness and harm to purposes.

7.2 Impact of the proposed development has largely been assessed by the local plan Inspectors in their post hearing letter of 1^{6th} December 2022.

7.3 The development falls to be considered in the context of the current development plan – the Local Plan Core Strategy of 2014

7.4 It would seem to me in that context that there is logic in the conclusion that if justification for the SEWEA cannot meet the exceptional circumstances test, then a planning application for a substantial part of that allocation must fail the very special circumstances test.

7.5 In reporting their recommendation to the Development Management Committee in March 2022, Council officers appear to substantially agree with the position identified by both the Local Plan Inspectors and the decision relating to the Stobart scheme in terms of Green Belt impact.

7.6 The Council clearly accepts that the proposed development will at the very least will have a substantial impact in terms of the purposes of Green Belt

7.7 It is clear that the level of harm to the Green Belt in terms of openness, purpose and visual impact must be afforded substantial weight

Landscape and visual impact

7.8 The elevated position of the site is apparent to any observer looking north from Grappenhall Lane.

7.9 It is clear that the Inspectors considering both the local plan and the Stobart appeal identified the prominence of this area, which combined with the scale of buildings would result in harm to the appearance of the locality.

7.10 At paragraph 10.143 of the officers report to committee

Ramboll has confirmed that there is a degree of consensus about the extent of the significant landscape and visual effects (i.e. they would be significant), and that the proposed perimeter landscaping and attenuation bunding are not expected to be particularly effective in overcoming the significant landscape and visual effects.

Highways and Transport

7.11 Whilst the SWP has consistently expressed concern over the ability to secure meaningful improvement, the emerging local plan at least provided scope for a comprehensive, integrated approach to highway provision

7.12 The application site is not in an accessible location. The development would add to the problems of an already congested network, with few reasonable alternatives to the use of the private. Development would be contrary to the provisions of development plan policy and would result in substantial harm.

Heritage

7.13 The proposed development pays insufficient regard to the scheduled monument at the centre of the site.

Air Quality

7.14 SWP and its constituent Parish Councils have consistently expressed concern on matters relating to air quality. The core substance of this concern is highlighted in the Local Plan Examination Hearing Statement.

7.15 The proposals increase the risk of issues for air quality.

8 The Planning Balance

8.1 In accordance with section 38(6) of the 2004 Act, this application has to be determined in accordance with the development plan, unless material considerations (which include the Framework), indicate otherwise.

8.2 The key policy in this case is CS Policy CS5, which states that the Council will maintain the general extent of the Green Belt for as far as can be seen ahead and at least until 2032, in recognition of its purposes – one of which is to assist in safeguarding the countryside from encroachment. The policy goes on to state that development proposals within the Green Belt will be approved where they accord with relevant national policy.

8.3 It is my firm view that the substantial weight arising from the Green Belt harm, together with the other harm identified, would not be clearly outweighed by the other considerations detailed above. As such, I conclude that very special circumstances do not exist to justify this inappropriate development in the Green Belt. Accordingly, the proposal would conflict with CS Policies CS5 and CC2, and with NDP Policies AT-D1 and AT-D2. It would also be at odds with Green Belt policy in the Framework.