

Thank you Sir for this opportunity to address the Inquiry

I speak today in my capacities as:

- Ward Councillor for Appleton on Warrington Borough Council and member of the Council's Development Management Committee (DMC);
- Parish Councillor on Appleton Parish Council in which Parish the site for this application is located (My Ward neighbours the application site)
- Member of South Warrington Parishes Local Plan Group

I have held all 3 roles since being elected in May 2021. I have also been a resident of Appleton for 33 years.

I was a Member of the DMC which considered this application on 10 March 2022. I return to that topic today because the Applicant referred to and relied on parts of the March 2022 DMC paper in his Opening Statement.

My first reading of the paperwork issued for that meeting led me to believe that the balance of arguments weighed in favour of approving the development.

However, it became apparent on closer reading that the Committee Report contained too many selective extracts from Local Plan and Neighbourhood Plan policies which created a selective and incomplete narrative.

I therefore concluded after further reading and debate at DMC that the application did not justify the existence of very special circumstances which were necessary to approve this proposed significant development in the Green Belt. I and other DMC Members were of course out voted on the night.

The unbalanced narrative was confirmed in a clarificatory email to DMC Members at the request of the DMC Chair on 8 March 2022 which confirmed that the structure of the Environment Statement sections of the Committee Report began with and I quote "a summary of the Applicant's submission on each matter". Not surprisingly, the Applicant was putting forward their best possible case as is the role of any advocate. This important email is not available as an official public update email on the Council's DMC webpage for that meeting which is why I wanted to draw it to public attention today.

Also today, I wish to highlight some of the important policies and relevant narrative in the current 2014 Local Plan Core Strategy which were omitted at the March 2022 DMC

paper before I move on to the new Draft Plan Status and prematurity and also the other NPPF relevant issues for the residents I represent.

By way of example on the 2014 Plan, I will highlight Paragraph 10.368 of the March 22 DMC report. This states that there are policies in the development plan with which the application “accords” notably CS1 and CS5 whilst acknowledging failure to meet policies CC2 and D1 and D2 of the AT NDP. Under no circumstances does this application conform with CS5 which states, inter alia:

*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:
to check the unrestricted sprawl of large built-up areas;
to prevent neighbouring towns from merging into one another;
to assist in safeguarding the countryside from encroachment; and
to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
The boundaries of the Green Belt in Warrington, which is contiguous with the Green Belt in Merseyside, Greater Manchester, and North Cheshire, are shown on the Policies Map.
The strategic locations and proposals set out in Policy CS2. There is therefore no need to review Strategic Green Belt boundaries during the plan period.*

CS2 mentions :

*.....The following principles will determine the detailed distribution of development through the Local Plan Core Strategy period:
The general extent of the Green Belt and the detailed boundaries as indicated on the Local Plan Core Strategy Policies Map will be maintained for as long as can be seen ahead and at least until 2032;.....*

The main focus for other business, general industrial and storage / distribution development (B1/B2/B8) will continue to be the existing employment areas of the town principally Birchwood Park, Gemini & Winwick Quay (within the wider A49 corridor), together with further sites at Woolston Grange and the strategic location of Omega and Lingley Mere.

Major Warehousing and Distribution developments will be located away from areas sensitive to heavy vehicle movements, with direct access to the Primary Road Network, and where possible with access to rail and/or the Ship Canal.....

There is no mention of Appleton Thorn in CS2 referenced in CS5. Birchwood, Gemini, Omega, Woolston Grange, Winwick Quay were all referenced as was access to primary road network and rail/Ship Canal where possible.

With a Plan protecting Green Belt to 2032, the Council’s original support for this application and its current non-committal position serves to destroy public confidence in the Local Plan System particularly when the 2032 commitment to maintain the general extent of the Green Belt was, to the best of my knowledge, not explicitly mentioned in the March 22 DMC paper.

The DMC’s decision on 10 March 2022, which relied on draft 2021 Local Plan data, has now effectively been dismissed based on the Draft Local Plan Examination Inspectors’ post hearing letter dated 16 December 2022 which concluded that “the submitted Local

Plan is not sound as it stands” but went on to say “can be made sound by main modifications” which would then need to be consulted on. The Council accepted this situation with its schedule of main modifications consulted on in the last 6 weeks.

I wish to formally record my opposition to this application for the following reasons.

Firstly, the main modifications proposed included removal of the South East Warrington Employment Area within which this application would sit as the major part of the SEWEA. This is because the Local Plan Inspectors concluded that the proposed Local Plan employment area requirements of 316.28ha were overstated. The Inspectors said that this level of requirement is “not justified and it should be reduced to 168ha”.

The Inspectors referred to “twelve years supply” and possibly “twenty years supply” of employment land which can be met without Green Belt encroachment so again, I quote “there is no strategic need for the SEWEA therefore”.

The Inspectors said SEWEA would cause “substantial visual intrusion”, be “transformative in nature” and “have a significant and adverse effect effect on the character and appearance of the area”. The SEWEA was said to “involve a substantial incursion into largely undeveloped and open countryside. It would represent significant encroachment into the countryside”.

So “Severe” visual harm to openness of the Green Belt and a Significant impact on character and appearance. Also no strtategic need for the Employment area given the emergence of the Fiddlers Ferry option.

So the Local Plan Inspectors have said “there is no strategic need for the SEWEA allocation,” of which this application is a major part, “in terms of employment land or the range and type of employment that would be available.” Furthermore, “economic benefits as a result of the allocation.....do not outweigh the above concerns”. They go on to say “Exceptional circumstances to alter the Green Belt in this case do not exist. In order for the Local Plan to be justified and consistent with national policy the proposed SEWEA and policy MD6 should be deleted therefore”.

It is absolutely clear from these conclusions that the exceptional circumstances recommended to DMC Members on 10 March 2022 do not exist and the application should not have been approved and should not proceed.

I now turn to prematurity. I maintain the Council erred with its February 23 paper with its non-committal recommendation for this Inquiry. It is absolutely clear to me that

Prematurity is relevant having regard to paragraphs 49 and 50 of the NPPF. Both Parts a and b are clearly fulfilled in terms of Para 49 and as are the terms of Para 50. These factors, when considered alongside the plan led principle in para 15 of the NPPF, would in my humble opinion justify refusal of this application on grounds of prematurity.

Contrary to the Applicant's opening statement, the Draft Local Plan is at an advanced stage. Council has confirmed its position in the main modifications in its letter to the Planning Inspectorate dated 22 December 2022 where it confirmed it would proceed to consultation "in accordance with the conclusions on the key issues of soundness as set out on your letter of 16 December 2022". The resultant 6 week consultation on the draft Local Plan so modified concluded on 26 April 2023. This consultation was carried out in line with Part c of the Draft Local Plan resolution at Full Council on 4 April 2022 and was made possible by Part d of same resolution which authorised (Part d of resolution refers) the Council's Director of Growth to "confirm the Council's position on those main modifications".

I found February 2023 non-committal recommendation to DMC and the subsequent democratic approval of this policy by the DMC to be inexplicable given the Local Plan Examination inspectors' conclusions in the post hearing letter. These conclusions clearly showed that the basis of the DMC's original decision on this application were built on unsound judgements and facts. I believe this current situation with the new Draft Local Plan should have been properly acknowledged by the Council at this Inquiry. For this reason, I voted against this DMC recommendation on 1 March 2023.

Beyond the Local Plan Inspectors post hearing letter's comments on the required employment areas, other issues arose during the Local Plan Examination which had either not been properly addressed in the specific 10 March 2022 DMC report and/or which had shortcomings.

For instance, vehicles to and from the application site are not limited to HGVs nor are they all going to come and go via Jn 20 M6. It emerged during the Local Plan examination that the SEWEA would be the base for potentially many hundreds of local distribution vehicles to serve Manchester, Liverpool Cheshire and southern Lancashire. The site was said by the applicant to be a perfect range for electric transit type vans to serve both Manchester and Liverpool. The impacts of these vehicles were not adequately addressed at the application stage not least the impacts on Warrington's roads given its well identified transport infrastructure bottlenecks which are further exacerbated when the motorways are congested. These frailties have come into stark

focus in recent weeks when all 3 ancient/unmaintained swing bridges crossing the Ship Canal having each been out of action causing severe bottlenecks.

The new draft local plan promises new infrastructure, albeit on non-guaranteed timescales. This application will severely impact on Warrington's traffic north/south and east/west. It is 100% premature to consider this application without looking at the impact and harm from consequential traffic. Contrary to the DMC report, most associated traffic, (not just HGVs as implied but workers' private cars and Transit type local distribution vans) will not just use Jn20. There will be many local rat runs at all times but particularly when motorways are congested.

The draft Local Plan is no longer assuming the biggest road infrastructure project, the Western Link, due to funding challenges. The harm to Warrington's traffic would be severe and potentially catastrophic. This is not just my words. In its CD29b submission to the Local Plan EIP, the Council admits

“the constituency of Warrington South and the wider borough of Warrington is long overdue significant investment in its transport infrastructure to alleviate the well documented congestion issues it and its residents suffer”.

The application will increase that congestion. I travelled along Grappenhall Lane for 30 years going to work. I know from experience. It was regularly congested and still is today. On 26 April, I went to a football match in Manchester at 5.15pm and was confronted by stationary traffic along the length of Grappenhall Lane. I therefore did a U-turn and used a rat run by Barleycastle Lane, High Legh, Broomedge to reach the M56 at Jn7. This will be magnified regularly across all Warrington if this application goes ahead.

The application is not sustainable. The bus and bike proposals are woefully inadequate. The site is on the highest part of Warrington, the bike measures do not link to Warrington's urban network, the A50 is unsuitable/unsafe for large numbers of bikes and pedestrians. It has no rail links which a modern distribution hub should have eg the East Midlands Gateway. Cars will be the dominant form of transport for workers not least the 50-70% who are likely to come from outside the Borough.

Air Quality impacts, particularly particulates, can only increase as a result of this application in a Borough surrounded by motorways and already plagued by congestion. The limited data available today, due to lack of measurement/monitoring, indicates particulate levels in and around Warrington are already above WHO guidelines.

Another example of Local experiences being ignored in consideration of this application is the commentary on Litter impacts. The Litter problems from existing warehouses in the Appleton Thorn area are enormous because Companies operate Clean Cab policies for Company vehicles on return to base. Rubbish is dumped on the roadside and requires road closures to clean up. The DMC report claimed that there is no evidence to suggest this problem would intensify with these new warehouses. This conclusion in the DMC paper is not backed by evidence. Local residents know the reality.

The treatment of historic assets is outwith policy QE8 and inconsistent with the Council's approaches to historic assets in the North of Warrington

It is difficult to reconcile any aspect of the application with the Appleton Thorn Neighbourhood Development Plan policies despite commentary to the contrary in the March 22 Paper

I do acknowledge that employment gives some economic benefits. However, the previously stated severe harms balance against the limited very special circumstances given by applicant the Council. Furthermore, as the Council states in the March 22 DMC paper, these benefits are highly debateable and will in large part accrue to many surrounding areas where workers will be drawn from given Warrington's low unemployment rate whereas all harms accrue to my and the surrounding Wards and Parishes in Warrington.

I would like to thank you for giving me time to express my concerns about this very damaging and inappropriate application. It will inflict severe/significant unjustified harm on amenity and character of the South of Warrington. The applicant is seeking to work around the extensive Local Plan process and the applicant does not fulfil the requirements of the NPPF. For these reasons, it is strongly opposed by me as a locally elected representative and by many local residents who care about the special rural character of this area and specific site which should be maintained for future generations.

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