



Groves Town

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Client	South Warrington Parish Councils Local Plan Working Group
Document Title Version/Date	Comments on Warrington Local Plan Main Modifications
GTP ref	2304003 v2

1 Introduction

- 1.1 The South Warrington Parish Councils' Local Plan Working Group (SWP) was set up to enable a co-ordinated and collective response from Parish Councils representing the areas in the South of Warrington, to the various stages of the emerging Local Plan. The Parish Councils of Appleton, Grappenhall and Thelwall, Hatton, Lymm, Stretton and Walton are represented.
- 1.2 SWP has consistently raised issue at the various stages of the plan making process. Concerns relating to the fundamental principles which have driven the Council's approach to the Plan; the need for development of the scale proposed and the consequent justification for the release of Green Belt and the paucity of infrastructure provision have underpinned the SWP representations to the emerging plan.
- 1.3 The SWP recognises the significant modifications tabled in line with the findings of the Local Plan Inspectors and their post examination comments. The removal of the previously proposed South East Warrington Employment Area as a main modification to the plan, is considered to be fully justified. This action is entirely consistent with the views of the SWP that the scale of employment development needed is unjustified and a product of overly ambitious and aspirational levels of growth, which have not been shown to represent the exceptional circumstances needed to justify removal of large areas of land from Green Belt.
- 1.4 It is the view of the SWP that the scale of modification does not go far enough. Housing Growth continues be supported by irrational and overstated levels of growth. The evidence of build out rates and the total disconnection between the

proposed housing trajectory and rates of build which have been historically experienced results in continued concern that the comprehensive ambitions of the plan will not be secured and that historic issues of development taking place in the absence of necessary infrastructure will be repeated.

1.5 It remains the case that there is considerable concern that additional infrastructure necessary to support the development is becoming increasingly unaffordable, especially as funding is almost totally dependent on resources provided through planning obligations, CIL payments or such alternative means of securing developer contributions. Changes to the processes by which developer contributions might be secured reduces confidence that the full package of infrastructure presented as a necessary and critical element of the Local Plan will simply not be achieved.

1.6 The SWP has consistently flagged that the aspirations for the Plan start from a position of infrastructure deficit. The highway network is congested and already operates above design capacity. Development in South Warrington is dependent on the use of crossings of the Bridgewater Canal, the Manchester Ship Canal and the River Mersey. In a number of cases this involves the use of Georgian bridges and tunnels, Victorian Swing Bridges which are simply incompatible with the scale and form of growth proposed.

1.7 The Plan as it has emerged has always promoted synchronisation with the Local Transport Plan as the means by which these issues will be resolved. The SWP has consistently expressed concern that the scale of residential development proposed cannot take place unless there is absolute certainty over transport infrastructure

provision. The scale of Green Belt release for housing cannot be justified until this uncertainty is fully resolved

1.8 Schools, leisure and medical facilities are over stretched. It remains unclear as to how necessary facilities will be delivered in a timely and co-ordinated manner.

1.9 It is disappointing that the strategic objective of the Plan to secure regeneration of the town centre and inner wards of Warrington is still not addressed. Plans continue to promote suburban development, which benefits from easy access to the motorways network, with Warrington residents accessing employment, leisure and shopping opportunities away from the town, or at best in out of town business parks, with no connection to function or economic benefit of the town centre,

1.10 Modifications proposed do not address these issues but continue to promote development on a purely statistical methodology without apparent understanding of the Warrington housing market.

1.11 It remains a matter of concern that the modifications do not take account of the reservations of the SWP expressed throughout the Local Plan process. Individual sites continue to be allocated without full understanding of the complexity of issues relating to junction design, heritage assets, ecology and residential amenity.

2 Changing Circumstances

2.1 The SWP recognises that the background to the evolution of policy is constantly changing and that it will be necessary to reach a point where policies are fixed.

2.2 In this case however the consequence of current proposals and allocations requires the removal of large parts of the Green Belt in South Warrington.

2.3 The emerging policies of the draft NPPF, changes to ONS figures relating to affordability ratios and other matters would be likely to result in a different

approach to the Warrington Local Plan if they were considered, instead of the figures and approach adopted when the Preferred Submission Version of the plan was formulated two years ago and based on considerations going back to 2017.

2.4 It is becoming increasingly apparent that many local planning authorities are choosing to pause consideration of their plans to enable revised approach to housing supply requirements to be considered. This includes plans which have reached an advanced stage of preparation and where consideration by Inspectors is already underway.

2.5 Given that it is assessment of housing land requirements which is the sole justification providing the exceptional circumstances for the removal of land from the Green Belt, it is clear that the modifications should go further and reduce the scale of Green Belt release.

Modification Reference Number	UPSVLP Policy or Paragraph Number	SWP Comment
MM 001	Para 1.1.1 Introduction 1.2.12	This reduction is almost entirely accounted for by the removal of the 137ha of the SEWEA allocation. The statement is misleading in terms of the concentration of Green Belt removal in South Warrington with consequent implications for the wider effectiveness of the Green Belt
MM 002	Vision and Spatial Strategy Para 3.2.3 Figure 3 Para 3.3.5 Para 3.3.7 Para 3.3.8 Para 3.3.19 Para 3.3.21 Para 3.3.23 Para 3.3.24 Para 3.3.25 Para 3.3.26	It is considered that the concentration of new residential development in South Warrington remains inconsistent with the strategic objective of regeneration of the town centre and the strengthening of existing neighbourhoods. The plan as currently presented does not ensure the provision of local and strategic infrastructure. <u>CHANGES TO NATIONAL POLICY</u> Changes to national policy and to the background to housing delivery is likely to change the figures required to meet Warrington’s Housing Needs. This aspect of the Plan requires review and amendment prior to adoption in the absence of certainty that the figures are an

	<p>Para 3.3.30 Para 3.3.31 Para 3.4.7 Para 3.4.10</p>	<p>accurate representation of need. This is particularly the case given that housing need is the sole basis for proposed Green Belt release.</p> <p><u>IMPACT OF THE FAILURE TO DELIVER THE WESTERN LINK ROAD</u></p> <p>Uncertainty over the ability to provide the Warrington Western Link compromises the delivery of LTP4 and therefore stated infrastructure requirements to enable the proposed development in South Warrington to take place. Far from the suggestion of paragraph 3.3.30 the uncertainty of deliver seems likely to increase in the period for any possible review of the plan. There is no evidence to suggest that the current and increasing short fall and increasing costs will secure funding for this development within any predictable timeframe.</p> <p><u>FAILURE TO SUPPORT REGENERATION OBJECTIVES</u></p> <p>The promotion of the development of previously undeveloped land within the Green Belt undermines the ability to secure quality and value of development which might best serve the regeneration and beneficial development of inner urban areas.</p> <p>It is illogical to reduce the scale of the housing allocation for Fiddler’s Ferry and to retain</p>
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		<p>the release of Green Belt in South Warrington.</p> <p><u>OPPORTUNITY TO MINIMISE GREEN BELT RELEASE WITH SUGGESTED ADJUSTMENT OF HOUSING PROVISION</u></p> <p>There is opportunity in this context to remove allocations at Thelwall Heys and in Lymm which represent particularly sensitive incursions into the Green Belt and where other material considerations – access, heritage, ecology, air quality, noise and amenity should be taken into account.</p> <p><u>PHASING OF INFRASTRUCTURE DELIVERY</u></p> <p>Policy as currently framed provides no certainty over the management of infrastructure delivery. The plan remains weak in setting out precise infrastructure requirements, timing and means of delivery. The time likely to be taken to formulate any adopted development plan documents needed to establish requirements, set methods for delivery and phasing requirements, exposes the Council to historic problems of piecemeal development and time lag between development and infrastructure delivery.</p>
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		<p><u>EXCEPTIONAL CIRCUMSTANCES</u></p> <p>It is surprising that exceptional circumstances are still framed in a context of levels of economic growth which have already been found to be overly aspirational by the Local Plan Inspectors.</p> <p>There is little logic in recognising that employment land allocation can be legitimately reduced whilst simultaneously retaining the same levels of housing delivery.</p> <p>The plan retains concepts derived from the original “self contained” garden suburb concept which was based on the connectivity between housing and employment. Changes to the plan remove that connectivity. Justification for the release of Green Belt land is no longer applicable in the manner previously prevented.</p> <p><u>SOUTH WARRINGTON URBAN EXTENSION</u></p> <p>The plan should allocate land for the requirements of the plan period. The ability to confidently predict housing need beyond the plan period is limited and could result in acceptance of Green Belt release which may not prove to be necessary.</p> <p>The only reason to include larger housing numbers beyond the plan period lies with the</p>
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		<p>need to enable development of such a magnitude which might give rise to a quantum of developer contributions necessary to provide the infrastructure requirements created by the development and to meet the Plans expectation of delivering improvements which deal with existing problems.</p> <p>The linkage between development and infrastructure provision continues to be inhibited by lack of precision and uncertainty over funding and delivery. Unless this uncertainty is resolved the deliverability and soundness of the plan remains doubtful and the decision to adopt the plan with just the modifications proposed open to challenge.</p> <p><u>THELWALL HEYS</u></p> <p>It is considered that the challenges to the Thelwall Heys allocation made by SWP and by Grappenhall and Thelwall Parish Council remained unanswered.</p> <p>The credibility of the site in terms of the function of the Green Belt was clearly established. Highway related and heritage constraints have not been addressed in a manner which demonstrates that the site is suitable for allocation.</p>
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MM005	DEV4 Part 1 Part 4 Part 8	<p>No objection to modification but note reservations about correlation of historic employment land take up with job creation and population growth.</p> <p>Any review of the employment land requirements should take place at a time when there is</p>

	<p>Part 11 New Part 17 Figure 4 Para 4.2.13 Para 4.2.14 Table 6 Para 4.2.18 Para 4.2.19 Para 4.2.22 Para 4.2.26</p>	<p>clear evidence of changing circumstances.</p> <p>Confidence in the plan led process would be eroded – more than is currently the case, if an early review undermines decisions made at this stage of the plan making process</p>
<p>MM006</p>	<p>DEV5 New Para 4.3.6</p>	<p>If the expectations of this policy – the primacy of the town centre are to be secured, the scale, form and timing of development in the Green Belt will need to be managed to avoid focus on “easy wins” in the development of greenfield and Green Belt sites.</p>
<p>MM007</p>	<p>Part 3 Figure 6 Para 5.1.5 Para 5.1.9 Para 5.1.19</p>	<p>The deletion of the SEWEA as an employment allocation and the retention of the site within the Green Belt is considered to be justified.</p> <p>It is considered that further review of the consequent need to release land from the Green Belt for housing land should be reviewed as a consequence.</p> <p>Additional merit for such further review comes from emerging changes to national policy and ONS figures – particularly relating to affordability which might reduce housing need</p>

		<p>assessments.</p> <p>The extent and form of the SEWUE should be reviewed as a consequence</p> <p>In the context of a reduction in the overall housing allocation across the plan modifications should logically result in the deletion of Green Belt sites in Thelwall and Lymm instead of land outside the Green Belt where additional regeneration benefit would be secured.</p> <p>5.1.19 references Employment Land review during the plan period and references the scope for improvement to motorway junctions as material to the release of additional land for employment. It is considered that this understates other issues such as Green Belt release which would need to be considered if additional allocations are to be contemplated.</p> <p>It is acceptable to note the potential need for review but such need should not be predicated on matters such as works to motorway junctions.</p> <p>It is also unclear as to the nature of improvements proposed. It is currently understood</p>
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		that junction improvements would be carried out in response to requirements prompted by additional development.
MM008	INF4 Part 4 Para 7.4.9	<p>It has consistently been part of the SWP submissions that the Local Plan should make clear and specific provision for a town centre site for a new hospital. A plan led system should lead decision making processes rather than simply respond to the options of others. Site allocations would secure compulsory purchase powers and the allocation of the existing site would support wider planning and assessment of the package of proposals.</p> <p>The Council's aspirations to secure a medical facility with related academic development would closely align with objectives to secure town centre regeneration and for the town centre to be the preferred location for service, administration and leisure uses. Policy should be adjusted to reflect a proactive rather than a reactive position.</p>
MM018	ENV8 Part 4 Para 9.8.6	Noted and supported
MM019	MD1 Para 10.1.1	Note concerns and comments re the prospect of securing the Western Link Road within the

		Plan Period
MM 020	MD2 Part 1 Part 3	<p>It remains the contention of SWP that the scale of the development proposed in South Warrington exceeds that which is required if realistic growth aspirations are applied.</p> <p>It is wrong to rely on development which is planned to take place after the plan period to fund infrastructure which will be required to deal with the impact of early phases of development.</p> <p>The contribution to facilities is necessary but amended policy still fails to co-ordinate and establish timings for infrastructure to be brought forward to match the pace of development.</p> <p>Limits should be placed on the scale of development which can take place in advance of infrastructure being in place.</p> <p>The precise nature and statutory status of the Development Framework and the process of the adoption of such frameworks should be made explicit. Frameworks should have clear and explicit status as development plan documents forming part of the Development Framework.</p>

		<p>Development Frameworks should be prepared by the Council and <u>should not</u> be authored by prospective developers or others with a vested interest in development.</p> <p>The Development Framework should establish a comprehensive approach to the delivery of compensatory improvements. Improvements should not be allowed to take the form of piecemeal provisions for each development proposal but should reflect a holistic approach to the whole urban extension in a planned and comprehensive approach.</p>
MM021	<p>MD3 Para 10.3.3 Para 10.3.5</p>	<p>It remains the contention of SWP that housing numbers at Fiddlers Ferry should remain as initially proposed.</p> <p>Where a reduction in overall housing numbers is justified this should reflect protection of the more sensitive areas of Green Belt in South Warrington, particularly Thelwall Heys and Lymm and the need for development to encroach on Appleton Thorn and Stretton.</p> <p>The scale of development at Fiddlers Ferry should reflect the benefits of regeneration of that site and the harm which results from the unnecessary release of Green Belt in South Warrington</p>

		Note comments re development framework preparation above.
MM023	MD4 Part 1	<p>As noted above it is considered that rather than reduction in housing numbers at Fiddlers Ferry it would be in the interests of sound plan making to exclude the Thelwall Heys allocation from the Plan.</p> <p>For the reasons noted in the SWP Examination Statement it is considered that the development of this site will have a severe adverse impact on the function and purposes of the Green Belt</p> <p>Additional constraints in the form of highway safety, the visual impact of highway works, impact on heritage assets, trees and ecology go against the release of this site from the Green Belt.</p> <p>The sole exceptional circumstance presented in support of this allocation relies on the ability to bring the site forward early in the plan period.</p> <p>It is considered that the recent planning permissions for development within the town centre and the continued delivery of sites within Grappenhall Heys will have a direct impact on the housing supply, the trajectory if delivery in the early parts of the plan period and</p>

		<p>therefore the justification for release of this site from the Green Belt.</p> <p>It is noted that planning permission has now been granted on the Rushgreen Road allocation in Lymm.</p> <p>Development is also now underway on sites in Daresbury in Halton which serves the Warrington Housing Market.</p> <p>The need based arguments used to justify Green Belt release have changed since the Local Plan Examination and it is considered that the reasons previously provided to support this allocation no longer apply.</p> <p>It continues to be noted that the closest primary schools and their secondary partner schools continue to be oversubscribed.</p> <p>Note previous comments on the need to consider compensatory provisions comprehensively.</p>
MM024	MD6	The deletion of MD6 is fully justified and welcomed
MM028 MM029	OS4 Part 14	As noted above it is considered that rather than reduction in housing numbers at Fiddlers Ferry it would be in the interests of sound plan making to exclude the Lymm sites from the

	Part 22	<p>Plan.</p> <p>For the reasons noted in the SWP Examination Statements it is considered that the development of this site will have a severe adverse impact on the function and purposes of the Green Belt</p> <p>Additional constraints in the form of highway safety, the visual impact of highway works, impact on heritage assets, trees and ecology go against the release of this site from the Green Belt.</p> <p>In addition issues over air quality and noise relating to the proximity of OS4 to the M6 motorway are inadequately addressed within the plan and proposed modifications</p> <p>The sole exceptional circumstance presented in support of this allocation relies on the ability to bring the site forward early in the plan period.</p> <p>It is considered that the recent planning permissions for development within the town centre and the continued delivery of sites within Grappenhall Heys and Rushgreen Road will have a direct impact on the housing supply, the trajectory for delivery in the early parts of the plan period and therefore the justification for release of these sites from the Green Belt.</p>
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3 Conclusions

- 3.1 It remains the case that SWP considers the plan even with the Main Modifications to be fundamentally unsound.
- 3.2 It has been accepted that economic growth and related development requirements are overstated and the allocation of the SEWEA has been taken out of the plan.
- 3.3 The scale of housing development proposed remains largely unaltered and continues to require the release of significant areas of Green Belt in South Warrington.
- 3.4 It is of concern to the SWP that submissions based an exaggerated level of growth, which are purely aspirational and not soundly based, results in a false picture of the need for additional housing development. Modifications should include a review and alteration of the proposed SEWUE in order for the plan to be considered sound.
- 3.5 The plan is not based on sound strategy and is based on weak evidence.
- 3.6 Issues relating to emerging national guidance and figures relating to calculation of housing need are being used in other cases to prompt pause and reassessment of housing need figures. It would be disastrous if the release of large swathes of Green Belt in South Warrington which be based on exceptional circumstances of need takes place, only for the scale of that need to be reduced immediately following the point of adoption as result in changes of the method of calculation. There is potential for the plan to become effectively unsound thorough inconsistency with national policy within a short period following adoption. This undermines a plan led process for the consideration of development.

3.7 Once the plan is adopted there would be no effective scope to review the plan and retract the decision to release land from the Green Belt. A pause in the path to adoption is advocated to enable changes in national policy to be fully assessed before an irrevocable commitment to Green Belt release is made.

3.8 The SWP considers that the comprehensive delivery of the plan over the plan period continues to have unacceptable levels of uncertainty. It is unacceptable that detailed aspects of delivery and phasing would appear to be placed with developers and landowners through the production of development frameworks. There is no confidence that this approach will secure development which is of public benefit but simply development which minimises developer contributions and delays infrastructure provision late into development programmes.

3.9 The plan remains unsound as it is not effective and provides no clear pathway or certainty over the ability to deliver infrastructure needs critical to ensuring that development meets the fundamental objectives of sustainability as defined in the NPPF.

3.10 It is considered that the plan remains unsound on at least 3 of the provisions of paragraph 35 of the NPPF and that further modification is required. Adoption in its current form leaves the plan open to challenge.