
**Response to WBC Consultation on the
Proposed Submission Version of the Local Plan**

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1. Introduction

The proposed submission version of Warrington's Local Plan is fundamentally flawed. A planning inspector undertaking an examination in public should be in no doubt that the plan has resulted in widespread anger in Warrington. In south Warrington, the plan is universally hated and despite discussing it widely I have yet to find a single person who believes it is good either for south Warrington or for the town more widely. This opposition was expressed in around 4,500 objections submitted at the time of the Regulation 18 consultation. Warrington Borough Council (WBC) largely ignored these concerns, their changes amounting to small amendments to the size of the 'Garden Suburb', the removal of the word 'City' from its name and the deletion of a proposed new ship canal crossing from the plans, not because one isn't needed but because it was the cause of much public anger.

PLEASE NOTE: Should the opportunity arise to present the evidence contained in this objection at a future examination in public, I would be pleased to do so.

2. Summary of Objections

Our objection to the proposed local plan is threefold:

1. The plan is unsound – the assumptions of the amount of employment land and housing required in Warrington are incorrect and the plan is excessively developer led.
2. The removal of significant amounts of land from the green belt is unjustified due both to the overstated requirement for employment and housing land and fundamental flaws in the assessment of the green belt itself.
3. The plan is undeliverable – it fails entirely to recognise the unique constraints of the geography of south Warrington and provides no assurance that the resulting massive infrastructure investment can be delivered.

Each of these objections is discussed in more detail in the following sections.

2.1 *The plan is unsound – the forecasts of the amount of employment land and housing required in Warrington are incorrect and the plan is excessively developer led.*

At every stage of the plan-making process the council has inflated the requirements for both housing and employment land, taking the most favourable forecasts and applying significant uplifts.

The economic growth predictions which form the basis of the plan are heavily reliant on ambitions set out in the Warrington and Cheshire LEP Strategic Economic Plan and by the Atlantic Gateway Partnership. Both are private sector organisations, heavily influenced by large property developers

who, together with WBC, sit on their boards. These companies include Langtree (LEP and Atlantic Gateway Board and promoters of the green belt Six56 warehousing site in South Warrington green belt) and Peel Holdings (Atlantic Gateway Board and promoters of Port Warrington in the South West Warrington green belt). Whilst such partnerships between the Council and developers are not in themselves improper, they have led to economic plans which are shaped to support the business aims of these property companies which are strongly focussed around B2/B8 land use. The LEP economic growth strategy, which has influenced the housing requirement is essentially an untested growth aspiration which lacks rigour and is likely to contain considerable optimism bias. This in turn has led to WBC adopting forecasts which require the release of green belt land for schemes already being promoted by these developers and which can only succeed if green belt release is achieved. Forecasts, such as those produced by Oxford Economics, which predict lower employment land requirements, are systematically excluded. Conversely, forward projections which include previous employment land take up at Omega, a national scale development, are used as a basis for future employment land supply requirements. This assumes that Warrington will continue to require take-up on this scale over the entire plan period and is the basis for the significant proposed green belt release. It is not reasonable to forecast 20-year demand using values significantly skewed by a single very large scale one-off development.

WBC's policy aims to regenerate the town centre and provide high quality employment (planning policy objective W3). However, it is clear from the EDNA that much of the forecast growth is centred on warehousing and distribution and in fact will lead to a town ringed in large distribution centres (Omega, Six56, Port Warrington) which will generally provide low skilled, low wage jobs which are at risk of loss through increasing automation. Such an approach will inevitably lead to increased congestion and reduced air quality. The strategic land supply approach taken in developing forecast requirements is therefore directly contradictory to WBCs own policies and aspiration for the town.

The EDNA update prepared by BE Group in 2017 notes that there is perhaps 10-years further land supply at Omega capable of large scale B2/B8 development and significant competition from similar sites outside the borough. These include very large scale brownfield sites, for example at Parkside in Newton-le-Willows. Despite this there are already planning applications (Eddie Stobart and Langtree Six56) to develop green belt sites in South Warrington. The plan makes no provision for developing existing sites before releasing green belt. As these schemes are already being bought forward, the outcome of adopting this plan would be the development of green field sites for warehousing and distribution whilst suitable sites exist both at Omega and on other brown field land.

According to WBC's evidence, Warrington has sufficient housing land supply to meet its needs for nearly 15 years at 945 houses per year, a far higher build rate than that achieved over the previous 20 years (see section 2.3 below). However, WBC is seeking to adopt a 20-year rather than 15-year local plan. A 15-year plan, together with modest adjustment to housing requirements based on more realistic economic development forecasts, would allow all of Warrington's housing need to be accommodated within the existing urban area and would not require green belt release. The plan and supporting evidence is systematically biased towards WBC's ambition to grow Warrington into a 'new city' and justifies the 20-year plan on the basis that the resulting altered green belt boundaries could be shown to be durable.

However, it is likely that developments in technology, transport and work patterns together with national policies to improve air quality and tackle climate change will radically effect the forecasts on which these needs are based. In truth, the 20-year plan is proposed as a means of justifying green belt release.

The existing assessment of housing land supply has clearly been overtaken by events following the announcement by SSE, the owners of Fiddlers Ferry power station that it is to close in March 2020. The site, which has good road and rail links to the town centre could easily provide the remainder of the land supply required even for the most optimistic growth forecasts without the need for any green belt land to be released.

2.2 The removal of significant amounts of land from the green belt is unjustified due both to the overstated requirement for employment and housing land and fundamental flaws in the assessment of the green belt itself.

As noted above, it would appear that a 20-year plan is being used to justify the release of green belt. The selection of a longer plan period does not, and should not of itself constitute the 'very special circumstances' required to release green belt land. Furthermore, a significant proportion of both employment and housing demand can be met without green belt release within a 15-year planning horizon. Inevitably, the forecasts used to predict this demand contain significant levels of uncertainty. Given WBC's reliance on the most optimistic / aggressive growth forecasts, there must be at least a reasonable probability that the actual demand will be lower and green belt release will not be required.

The scale of green belt release in South Warrington will inevitably lead to developers bringing sites in the green belt forward for development long before sites within the existing urban area are exhausted. This is already happening in the planning application for warehousing for Eddie Stobart and Six56. A

key function of green belt is to encourage urban regeneration. The scale of release proposed will have exactly the opposite effect.

The green belt in south Warrington has been highly effective in preventing urban sprawl and preserving the special character and setting of Grappenhall village. We believe that in preparing the Local Plan, WBC have given undue weight to the green belt assessment prepared by Arup which is fundamentally flawed. This is not only our opinion. Joanne Harding, Principal Planning Policy Officer at Halton Borough Council, in comments to WBC [**Record G – Evidence Bases**, Responses from Prescribed Bodies and Specific Consultation Bodies as part of the Local Plan process on Local Plan evidence bases - Green Belt Assessment 2016] noted with respect to the Arup assessment report that “some of the language and sentence structures appear to be used specifically to confuse the reader.....The explanation of the proposed methodology is impenetrable..... the report comes close to misleading the reader by inviting them to conclude that the Courts have ruled the PAS Guidance is a material consideration”. Furthermore, a report prepared for the residents of Stockton Lane by a planning consultant familiar with Grappenhall raises significant concerns about the Arup methodology. The relevant sections of the report are included in Annex A below and form part of our submission.

Several examples of flaws in the assessment are set out below:

1. The scoring methodology scores areas/parcels against each of the five green belt purposes. However two of these purposes (preserving the setting of historic towns and assisting in urban regeneration) are judged to give approximately the same result in all cases. Despite the fact that they do not help to discriminate between areas, they are given the same weighting in the overall scoring as if they did.
2. The assessments fail to recognise Grappenhall village, Appleton Thorn, Stretton and Dudlows Green as distinct settlements and therefore do not give sufficient weight to the surrounding green belt’s role in maintain their distinctive character.
3. The assessments fail to give sufficient weight to the role of green belt in restricting ribbon development in General Area 10. The Arup methodology notes that land which is restricting the growth of ribbon development should be classified as ‘strong’ then systematically ignores this requirement in the general area assessments (for example in GA10).
4. The reasoning as to why an area/parcel only makes a weak contribution to the green belt are inexplicable. For example, for GA10 the reasoning states “The A56 and the canal form a durable northern boundary between the GA and the built up area which could prevent sprawl!”. The resulting classification as ‘weak’ is then used as an argument to justify releasing

land beyond this 'impermeable barrier' from the green belt. The same circular argument is used to justify classifying GA10 as 'weak' in the 'preventing encroachment' categories. The same argument is repeated in the individual parcel assessments on the northern boundary of GA10. We believe that GA10 and some of its parcels have been incorrectly assessed and in fact make a strong contribution to the green belt.

5. There appears to be a systematic bias which results in land in South Warrington which was historically designated for development in the previous 'new town' plans being assessed as making a weak contribution to the green belt. There is clear evidence of 'confirmation bias' in the assessment of South Warrington green belt.
6. General areas / parcels are classified as making a weak contribution to the green belt even when they are assessed as making a moderate contribution in several categories. The test for green belt release is 'very exceptional circumstances'. The proportionality method applied seeks to reduce the importance of an area/parcel and is used to reduce the importance of areas affected by the confirmation bias described above. If an area makes a moderate contribution to one of more purposes then its overall contribution cannot be said to be weak.

Furthermore, we believe that the assessment of the value of the green belt in this area has been unduly influenced by the requests from developers in the SHLAA. It appears that a parcel of land is more likely to be assessed as having a weak contribution if a developer has already requested it be released. This particularly seems to be the case with the very large parcels of land owned by Homes England (formerly the HCA). Inevitably developers will request easy to develop land in high value areas and we believe that the assessment of green belt value has not been sufficiently robust in these cases.

The mixed woodland, fields and hedgerows in the area also provide a varied habitat for wildlife. This includes swallows, buzzards, kingfishers, herons, hares, bats, foxes and a wide variety of small birds and mammals. Inevitably the proposed development will lead to significant loss of habitat. We believe that the current proposals do not give sufficient consideration to this aspect.

Finally, it is regrettable that WBC chose Arup to undertake the independent green belt assessments given the role of Arup Director Roger Milburn as Vice Chair of the Atlantic Gateway Partnership Board. As noted above, the Atlantic Gateway Partnership includes property developers Langtree and Peel Holding both of whom stand to gain immediately and significantly from the release of green belt land under the local plan.

2.3 The plan is undeliverable – it fails entirely to recognise the unique constraints of the geography of south Warrington and provides no assurance that the required massive infrastructure investment can be delivered.

Warrington Garden City Suburb is expected to meet almost one third of Warrington’s forecast housing need over the next 20 years on a single site. We believe there are serious concerns regarding the ability of WBC to fund and deliver the necessary supporting infrastructure over this period. Inevitably, this would lead to pressure from developers to deliver against the Councils stated housing need without the ability to provide the supporting infrastructure which the Council state is critical to such a large and concentrated development. Further concerns surround the ability to correctly phase the development of infrastructure to match the rate of development. A failure to do so on such a large concentrated development with the special access difficulties posed by the Bridgewater and Ship canals could have serious consequences for the ability of WBC to achieve its housing targets. We believe that a more dispersed pattern of development is likely to be more deliverable.

The Local Plan supporting evidence, largely targeted at inflated employment and housing requirements and green belt release runs to several thousand pages. The Local Plan itself mentions infrastructure 355 times. However, the Infrastructure Delivery Plan runs to just 16 pages and comprises no more than a wish list of items and an aspirational short/medium/long term timescale. In respect of the Garden Suburb the ‘plan’ is underdeveloped and largely unfunded and provides inadequate details of the phasing of infrastructure build. The Local Plan contains vague promises that the required infrastructure will be developed, and that it will be done in a timely manner, but provides no guarantees that planning permission on released green belt will actually be contingent on the provision of the infrastructure required. Discussions with council officers confirmed that the nearly £0.5bn of infrastructure required to support the Garden Suburb does not include a new road (or other transport link) linking a new Garden Suburb with the town via a new high level crossing of the ship canal (if that is in fact built – there is no commitment to doing so).

The proposals have not given sufficient consideration to how healthcare will be provided and in particular the effect of such large scale development on Warrington General Hospital, already under significant pressure and itself on a very constrained site. Similarly it is understood that South Warrington waste water treatment works is at capacity and would need extensive upgrading or renewal to support the scale of development proposed.

The plan requires that between 2020 and 2029 an average of 1457 new homes are completed each year. As shown in Figure 1, house completions between 2000 – 2018 averaged 736 per year in

Warrington. In only one year in this 18 year period (2007/2008) did new build completions exceed 1457. It is notable that the annual average for new home completions over the last decade (736) is almost identical to the 2016 based housing need requirement figures of 745 per year. This raises significant questions about the overall deliverability of the Local Plan. These are acknowledged (but not answered) by WBCs own ‘Development Options and Site Assessment Technical Report’ which states that “higher housing target could create significant issues of deliverability. It would require housing to be delivered at a consistently higher rate than Warrington has achieved historically”. From the foregoing it seems likely that the plan is undeliverable or, at least, will face major delivery challenges. The likely outcome is that early release of green belt will lead to this land being favoured by developers over that within the existing urban land supply whilst failing to meet the overall level of housing build rate required by the plan. We believe this evidence supports our view that WBC have over-estimated the demand for housing and employment land and have critically failed to prove the ‘very special circumstances’ required for green belt release.

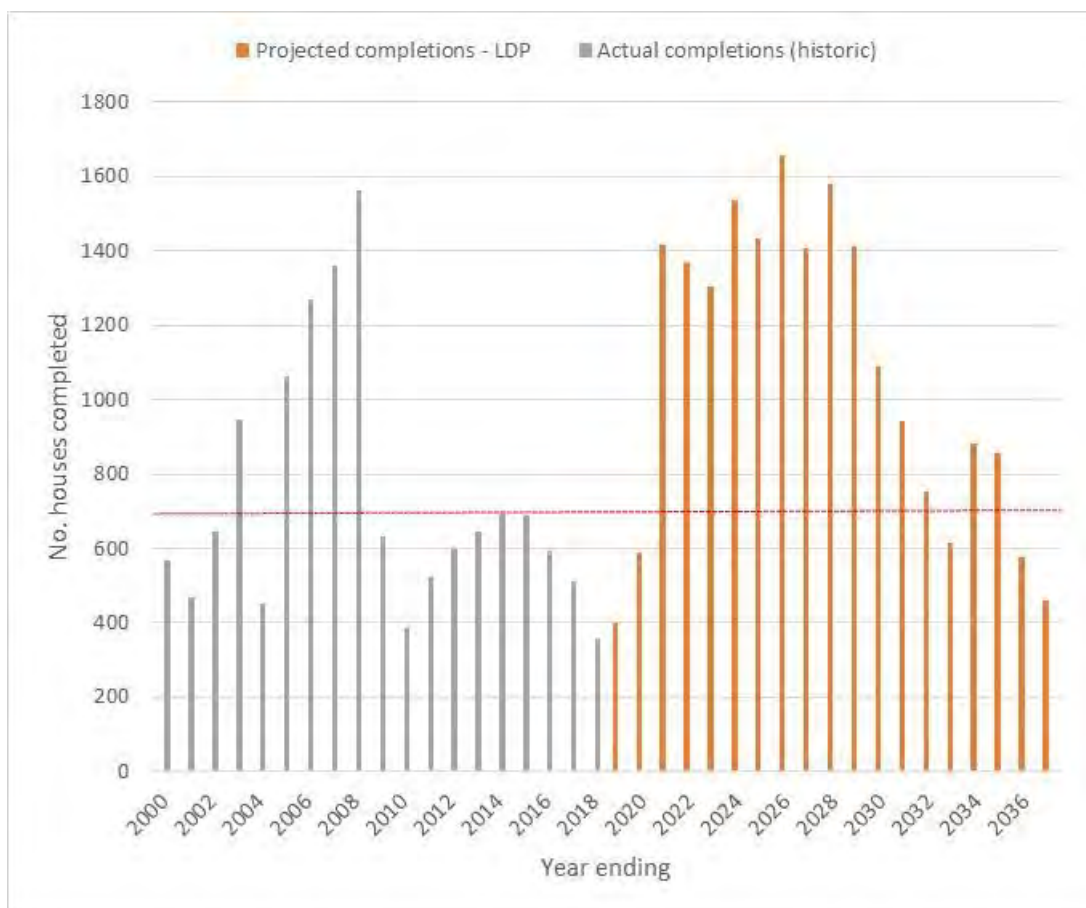


Figure 1: Actual housing completions 1999 – 2018 and projected completions under Local Plan. Red line shows average completion rate over last 19 years (736 pa)

The geography of South Warrington is unique. As shown in Figure 2, the northern edge of the Garden Suburb is bounded by the Bridgewater Canal. The Manchester Ship canal runs approximately parallel to the Bridgewater Canal at a distance of less than a mile. Residents travelling from the Garden Suburb to any other part of Warrington or workers travelling to the proposed new employment zones have to cross these waterways. The ship canal is crossed by either the Cantilever Bridge (narrow and height/weight restricted) or the Latchford Swing Bridge. Opening of this Latchford Swing Bridge is expected to increase significantly with the development of Port Warrington as ships have to navigate 'upstream' in order to turn for the journey back to Liverpool. The only major crossing for the Bridgewater Canal is the A50 Knutsford Road Bridge at the extreme eastern edge of the development. The most direct access to the proposed development is across Stanney Lunt Bridge and Lumb Brook Road under bridge. Both are narrow single track historic masonry arch bridges controlled by traffic lights, the former weight restricted and the latter weight and height restricted. They already cause significant congestion. Pictures of both locations are given in Annex B at the end of this document. WBCs transport planners stated, in response to questions about access to the Garden Suburb development, that traffic modelling at this level of granularity would be undertaken 'during the first 5-years of the plan'. They also confirmed that neither the Local Plan nor the Transport Plan provide any commitment to improve this access. The failure to recognise the unique geography of this area is either incompetence or wilful neglect. Far from being a detail matter to be resolved at a later date, the access to a development of 5000 – 7000 homes across two single track bridges is of critical importance to the deliverability of this development.

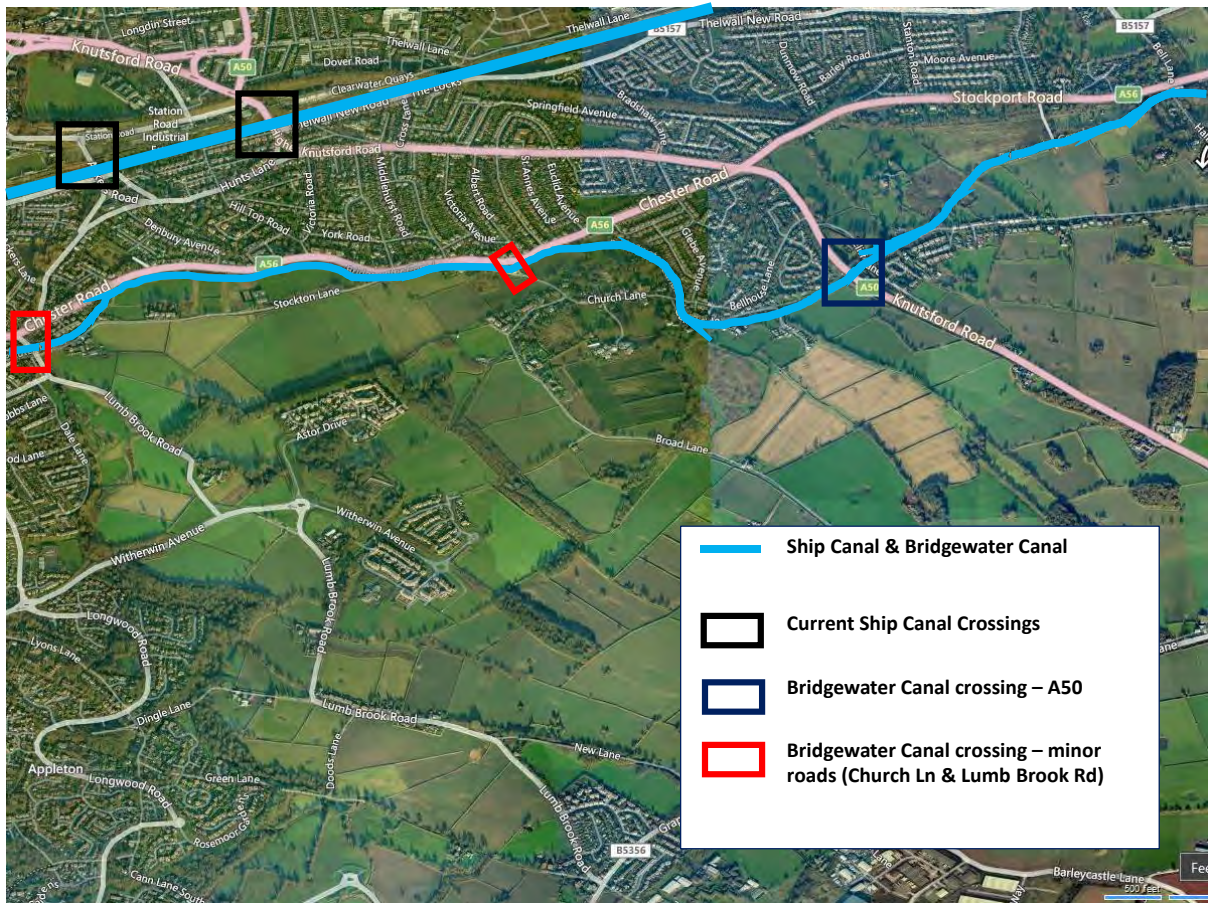


Figure 1: Garden Suburb Area Showing Ship Canal / Bridgewater Canal Crossings

3. How Should the Local Plan Change?

In the light of the flaws identified in our submission, the following changes should be made to the Local Plan:

- The unrealistic ambitions of the Strategic Economic Plan should be challenged in order to produce more realistic housing and employment land requirement figures. The evidence suggests that realistic values might be of the order of 750 – 800 houses per annum and 125 Ha of employment land.
- The Local Plan should be reduced to cover a 15 year period in order to avoid premature release of green belt land, encourage urban regeneration and maximise the use of the urban land supply.

- WBC should urgently re-evaluate the urban land supply following the announcement of the closure of Fiddlers Ferry power station. No green belt release should be considered until the future of the site is ascertained.
- Green belt release should in any case not take place until the existing land supply (employment and housing) is exhausted, for the same reasons listed above.
- The weaknesses of the Arup green belt assessments should be addressed. This would require removal of the systematic bias which results in land in South Warrington which was historically designated for development in the previous 'new town' plans being assessed as making a weak contribution to the green belt.
- WBC should prepare a detailed infrastructure delivery plan which explicitly ties the phasing of green belt release to the development of specific infrastructure. Development should not be permitted until each infrastructure phase is fully funded.
- For the Garden Suburb, the plan should make an explicit commitment to improved access between the Garden Suburb and the rest of Warrington across both the Bridgewater and Manchester Ship canals. ***The plan should show the type and route of proposed new roads / transport links and development should not be permitted until funding for the new infrastructure is agreed and committed.***

Annex A: Validity of Arup Green Belt Assessments

Extract from report prepared by Harry Shipley MRTPI FLI, Planning and Sustainable Development Consultant and former Warrington Town Planner on behalf of residents of Stockton Lane / Church Lane during the previous Regulation 18 consultation. This forms part of our objection to the Local Plan.

A1. Greenbelt Implications

Position Statement

The Council has placed an over-reliance on the October 2016 Arup report. The report should be set aside and revisited before moving to the next stage of the Local Plan.

My clients request that an accurate assessment be made of greenbelt issues before moving forward in the plan making process in line with the Landscape Institute's current view on this issue.

A1.1 Issues to be addressed in the October 2016 Arup Report

The following issues have been highlighted as requiring attention within the Arup report:

- The status and accountability of the report;
- The insensitivity of the Arup methodology;
- Inconsistent results within the Arup reports; and
- An incomplete process of greenbelt assessment.

A1.2 The Status and Accountability of the Arup Report

The October 2016 Arup report is unsigned and the quality assurance verification is not available for scrutiny.

The scoring system for the methodology is also challenged. Most importantly, it appears to rely on a majority vote of the 'professional' assessors. There appears not to be any record of who these assessors were, who were they employed by, how many assessors participated, who were they accountable to, what was their previous experience in this kind of work, what was their professional qualification and how was the vote split on each issue? This lack of accountability and transparency is a serious flaw in the report.

The public is entitled to know how much reliance it can place on this most important document, the decisions taken within the report and who the decision takers are.

A1.3 Insensitive Methodology

In selecting the preferred option, the Council relies heavily on the October 2016 Arup report within which a greenbelt assessment methodology is described and the results of applying that methodology are recorded.

The purpose and functionality of greenbelt and greenbelt policy as described in the Arup report is recorded as follows:

1. To Check the Unrestricted Sprawl of large built up areas

This should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.

2. To Prevent Neighbouring Towns from merging into one another

Green Belt is frequently said to maintain the separation of small settlements near to towns, but this is not strictly what the purpose says. Assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. A Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.

3. To assist in safeguarding the countryside from encroachment -

The most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.

4. Preserving the Setting and Special Character of Historic Towns

This applies to very few places within the country and very few settlements in practice. In most towns, there are already more recent development between the historic core and the countryside.

5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.

The Arup report goes on to say that guidance further suggests that land which is assessed as making a relatively limited contribution to the Green Belt, or land that might be considered for development, would be where:

- *It is effectively 'infill' development;*
- *It is well contained by the landscape;*
- *It would cause little harm to the qualities that contributed to the distinct identity (#unsure of meaning) of separate settlements;*

- *It could create a strong boundary with a clear distinction between 'town' and 'country'.*

Whilst it is acknowledged that the assessment of landscape quality does not form part of the required assessment process for greenbelt functionality, there is a need to place a greenbelt assessment methodology within a proper context. That context should and must be rooted firmly in a finely grained understanding of the landscape character of the area, properly recorded and fully argued. The General Areas, as recorded in the Arup report appear arbitrary and are defined by nothing other than physical lines of separation. They are unsupported by a Character Assessment, and are distorted further by a series of random mergers.

The Landscape Institute methodology for assessing landscape character (LVIA) is commonly accepted as the industry standard and has been tested at many public inquiries. This part of the planning process is missing in assessing the greenbelt functionality. It is acknowledged that the 2007 Landscape Character Assessment goes some way in making a 'whole town' assessment; but that study is not fine grained enough to use sensitively as part of a greenbelt assessment and does not have enough detail to identify character areas for the Parcels Assessment.

Point 2 of the above criteria calls for a Character Assessment and on this foundation the greenbelt assessment methodology should be built. The Arup methodology appears not to do this, nor for that matter can I find any reference to the 2007 Landscape Character Assessment or any other Character Assessment within the Arup report.

Furthermore, and with particular reference to Area 10 as part of the General Area Assessment, the Arup methodology and report has chosen **not** to recognise the protection offered by greenbelt land to the 'greenbelt over-washed' settlements of Grappenhall Village (a Conservation Area) and Stretton. The protection boundary chosen by Arup appears to ignore this effect and does not take this functionality into account at General Area level. Little wonder that the areas of land around these settlements perform poorly in the General Area Assessment. And little wonder these areas perform better when assessed within the context of the Parcels Assessment when this effect is recognised.

In planning terms, I would request that the Council gives consideration to two simple questions:

- Has greenbelt land and greenbelt policy protected Grappenhall Village from development beyond its boundaries?
- Has greenbelt policy limited ribbon development along Stockton Lane (part of Stockton Lane having already been developed prior to greenbelt designation)?

The Arup methodology for assessing General Areas records that the protection offered by this greenbelt land as 'weak'. It is difficult to conceive how this position can be supported by the Council. To the layman and the professional planner alike, the answer to both the above question must be a resounding yes. A methodology that runs contrary to common sense should not be relied upon and needs to be reconsidered.

A1.4 Inconsistent Results

As noted above, the General Area Assessment for Area 10 (part of the area for SWUE) is recorded as 'weak'. The Parcels Assessment of the same area tested against the same criteria recorded a set of results that were at worst 'moderate' (8 parcels weak, 12 parcels moderate and 7 parcels strong). This inconsistency is further compounded when the Parcels Assessment is cross referenced against the results shown in the July 2017 Green Belt Assessment (Additional Site Assessments of call for Sites Responses and SHLAA Greenbelt Sites) report where the distribution of results for development areas conflicts further with the General Area Assessment (15 weak, 15 moderate and 4 strong). Again, at worst this would give an overall performance of 'moderate'. Compounding this error, some of the results of these sites highlight further conflicts and inconsistencies compared with the results of the Parcels Assessment.

A1.5 Incomplete Assessment Process

Whilst the Parcels Assessment as a check on the General Area Assessment is to be applauded within the context of the methodology chosen, the vital loop back into the assessment process for reassessing the status of General Area 10 after the Parcels assessment has been completed is not made, leading to a false set of conclusions. This is a very important omission, as the grading of Area 10 as 'weak' has greatly influenced the outcome of the plan making process. Indeed, the Arup report acknowledges in principle this conflict at paragraph 150, but fails to examine the impacts of the Parcels Assessment on the General Area Assessment and fails to reconsider the ranking of Area 10 in the General Assessment.

Had the process been completed, it is difficult to see how the grading of Area 10 would remain as 'weak'.

The assessment of greenbelt is now an issue of national importance. The Landscape Institute is currently taking a leading role in establishing a consistent methodology for assessment. This is summarised at Appendix 5 of this report.

Annex B: Garden Suburb Access - Bridgewater Canal Road Crossings



Stanney Lunt Bridge and Church Lane from A56 Chester Road looking towards proposed development (Note, single track, traffic lights controlling junction and 6t axleload restriction)



Stanney Lunt Bridge from Bridgewater Canal



Lumb Brook Rd looking toward Chester Rd A56 (view approx. north)



Lumb Brook Rd underbridge (view approx. south toward proposed development)