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*Working locally and
nationally for a beautiful
and living countryside*

By Email: localplan@warrington.gov.uk

17th June 2019

Dear Local Plan Team,

1. I am writing on behalf of CPRE Cheshire concerning the Proposed Submission Version Local Plan, which sets out the legal planning framework for Warrington's development for the next 20 years.

Introduction to the Campaign to Protect Rural England CPRE

2. CPRE Cheshire believes a beautiful, thriving countryside is important for everyone, no matter where they live. Millions of town and city dwellers recharge their batteries with a walk or a bike ride in the local Green Belt, spend weekends and holidays in our National Parks, or enjoy fresh local produce. People who live in rural areas keep our countryside beautiful and productive.
3. During local plan consultations and the examination in public stage, CPRE successfully persuades Councils and Examiners to adjust downwards the development quantum to reflect up to date data and best planning practice. Consequently superfluous sites included in the land supply are deleted in order to save farmland in the countryside from preventable development.

Proposed Submission Version Local Plan

4. We agree that countryside and green space is most at risk without an up-to-date Local Plan, as Warrington could be subject to more speculative development proposals, resulting in unsustainable, unplanned, piecemeal development across the Borough without the required supporting infrastructure. It is important the Council has control over what development is imposed on Warrington, so we make our comments in order to progress a sound local plan without delay.

Vision & Objectives

5. CPRE Cheshire welcomes the Local Plan vision as set out in the six key objectives:
 1. CPRE Cheshire agrees that **future development must be sustainable**. But as a definition of sustainable development is not included in the National Planning Policy Framework, we think the Local Plan should use the Brundtland definition: *"Sustainable development is development that meets the needs of the present without compromising the ability of future generations*

to meet their own needs." And, of course we agree that everyone in the community should have access to a home. Needed housing, particularly affordable homes need to be properly planned. The history of Warrington and new town growth should be recognised and the role of windfall sites, so countryside isn't sacrificed too easily. CPRE, along with the wider public, recognises the importance of easily accessible countryside for leisure and health benefits.

- II. CPRE believes **Warrington's 'current' Green Belt boundaries should be protected over the long-term**, as the principle aim of Green Belt is to keep land permanently open. More focus of development on previously developed land is required to make effective use of land. We note density assumptions have been reconsidered and we advocate higher buildings in the largest settlement centres, appropriate to the setting. We believe more than 90% of Warrington's Green Belt can remain untouched for future generations. We therefore are opposed to the proposed Green Belt release in South Warrington, the Garden Suburb and South West Urban Extension.
- III. We are **pleased to see a focus of development at Warrington Town Centre**. It is right that development is focused at existing settlements in accordance with a hierarchy. We will provide new infrastructure and services to support Warrington's growth. We note the 10% windfall allowance and urge this is increased to 15% based on past trends.
- IV. CPRE Cheshire **agrees the Council must respond to the threat posed from climate change** and urges for investment in infrastructure that supports a zero net carbon footprint in the future. For too long there has been words, but no action, on this critical issue, which is reaching a critical point in time.
- V. CPRE **agrees that Warrington's distinctiveness should be protected** and this includes rural character and natural environment, and heritage via Conservation Areas through the Local Plan. It is good that the Council is committed to ensuring that Warrington's heritage assets will continue to be preserved and enhanced.
- VI. We **agree that minimising the impact of development on the environment is vitally important**. Community recycling centres are a welcomed idea and we urge for the reuse of previously developed land for this purpose.

Objective W1

6. We recognise it is the Government imposing high housing growth requirements on local authorities. CPRE and others responded to the Government's consultation on the housing 'standard method' evidencing that it is in fact flawed. The assumption that more houses built will reduce house prices is based on a false premise. The housing market is more complex with houses used for capital investments, with a rental market and not just as homes.
7. In addition, the Government dictating use of 2014, which is out of date data is widely considered poor practice. This will cause the loss of significant amounts of countryside. The significant brownfield land should be brought forward as a priority and not left wasted. We ask, won't allocating further greenfield land for development negatively impact on the viability of reusing brownfield sites? We believe it will.
8. Objective W1 citing 18,900 new homes is excessive, and is based on inflated growth projections. The yearly target of 909 dwellings is too high for the Council to reasonably deliver (evidenced by the fact Policy DEV1 has to step up delivery from a. 2017 to 2021 (first 5 years) - 847 homes per annum; and then b. 2022 to 2037 (following 15 years) - 978 homes per annum. This 'bloating' will cause the Council to fail against the Housing Delivery Tests meaning even more greenfield land

will get sacrificed for development. Why set the Council up to fail? Please read CPRE's research <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside> .

9. Warrington Council should stand up for its residents, and challenge the Government's 'standard method' for calculating the housing requirement, and use the up to date Office of National Statistic 2016 based growth figures. The Greater Manchester Combined Authority is already seeking to do this, to avoid development on Green Belt land. The total capacity of Warrington is identified at 13,726 dwellings, and applying the 2016 based growth rates derives a figure of 12,280 dwellings for 20 years, or 9,210 dwellings for a reduced local plan period of 15 years. This is a much more sensible approach to planning. We think a more modest buffer of 5% should be added rather than 10%.

Policy DEV1 - Housing Delivery

10. Policy DEV1 - Housing Delivery suggests "1,085 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to following outlying settlements:
 - a. Burtonwood - minimum of 160 homes
 - b. Croft - minimum of 75 homes
 - c. Culcheth - minimum of 200 homes
 - d. Hollins Green - minimum of 90 homes
 - e. Lymm - minimum of 430 homes
 - f. Winwick - minimum of 130 homes"
11. We are not convinced that if the Council were to use 2016-based projections, the Local Plan would be considered unsound, as Kit Malthouse, Housing Minister's comments to Andy Burnham, Mayor of Greater Manchester were about Councils being able to make an exceptional case to use an alternative method to the 'standard method' and use of Office of National Statistics 2014 based figures that inflate the housing targets. The 2016-based housing projections show the annual figure to be some 200 houses less per year at 614 dwelling per annum. It is best practice to inform projections with up to date data. We believe the housing numbers should be realistic and use best practice of using up to date figures, the Government is wrong to ask for reliance on out of date data. It is poor practice.

Policy DEV2 - Meeting Housing Needs - *Can it be assumed that all places can grow simultaneously, without a national level policy to increase international migration?*

12. All local authorities across the North, Midlands and South are planning for simultaneous growth. Therefore, CPRE Cheshire does not understand where all the people are expected to relocate from. There is not the level of constrained households (people living with extended family due to lack of affordable homes) to match the amount of houses being planned. This is an unsound way to plan for housing.
13. For the purpose of constrained households, more affordable housing should be planned. For this reason, we think Policy DEV2 - Meeting Housing Needs 30% affordable housing target should be imposed area wide, and this is vital to keep rural villages alive and not just the preserve of the more affluent. Furthermore, the number of ageing households is increasing and we must ensure adequate quality homes are provided in the future, as well as for young families and new entrants to owner occupation.
14. Planning over long timespans means the projections are unreliable and we believe the Local Plan W1 should only plan up to 2032, the required minimum 15 years. Warrington has finite land and Green Belt protection, it should not lose green space, countryside land too easily. CPRE Cheshire

believes that loss of farmland for development in the protected Green Belt designation can be avoided, and we agree the Green Belt boundary should endure over the long term.

Policy DEV4 - Economic Growth and Development

15. We of course want Warrington's economic performance to succeed in the future. However, CPRE Cheshire believes the contribution of the agricultural sector, for businesses and jobs and indirect jobs related to food and drink sector are underestimated. The calculation for the land requirement needs to fully value the contribution of rural economic sectors and value keeping farmland in agricultural production. This includes the visitor economy. Locally the horse, racing and equestrian economy is important and local people are concerned that liveries may be lost to development.
16. In addition to calling for a reduced number of homes in Policy W1 to reflect those really 'needed', we also think the employment land supply figure of 362 hectares of employment land in Policy DEV4 is also excessive. They have a low jobs density, in fact due to automation, they employ very few people, yet take a lot of land, and encourage more HGV traffic on our already clogged motorway and highway networks. Our narrow rural lanes are used as a cut-through by unsuitable heavy vehicles with impact on highway safety. Pushing a buggy or walking the dog means taking one's life in one's hands.
17. Reconsideration of large scale shed for B-8 Use Warehousing and Distribution should be undertaken as there is cumulative harm to Green Belt in conjunction with the B-8 proposals being planned by neighbouring authorities (St Helens, Wigan, etc), and under the Duty to Cooperate there is a responsibility to show more joined up strategic planning. In recent years speculative large scale employment sheds have been approved by local authorities and not called-in by Government even when Green Belt has been sacrificed. It indicates to CPRE Cheshire that Green Belt policy is not being properly protected by both tiers of Government. Once countryside land is gone, it is gone forever.
18. We believe more can be done to reuse brownfield land. We note there is enough previously developed land to accommodate 14,000 new homes and 115 hectares of employment in existing urban and brownfield areas. However, we have devised a Brownfield Registered Toolkit to enable communities to identify more sites on the Brownfield Registers. Our pilot of the Toolkit demonstrated that sites exist that are not known about, and this is a missed opportunity. We have long campaigned for prioritising the use of brownfield land for housing because we believe it stops the waste of precious countryside. CPRE national research shows that nationally 14% of sites were recorded over the past year, showing a renewable source of brownfield land. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4769-state-of-brownfield-2018>

Objective W2

19. Exceptional circumstances required for Green Belt release is eroded when alternative land to develop is identified. Of course it is most important that a five year housing land supply is defensible, or the Council loses power to control where development is steered, but new powers relating to Compulsory Purchase and raising funding to support brownfield regeneration in partnership with other stakeholders have been identified.
20. The Council should focus on mechanism to 'capture land values' and identify actions to 'unlock the potential' of its significant brownfield land resources.

21. Below we include a map extract to show just how much brownfield land exists on the Brownfield Register. We hope the Brownfield Register Toolkit will help people identify further sites, currently missing off the registers, or wrongly categorised as unsuitable.

Extract: Council's Brownfield Register Mapping showing large sites (Omega to the west, Arpley Meadows to the southwest, Cardinal Newman High School to east of Town Centre; New World, Pierpoint and Bryant Lagoon to southeast.



Fiddlers Ferry

22. We acknowledge the Council is aware that the Fiddlers Ferry power station is likely to cease operations due to Government commitments to decarbonise and stop using dirty coal power by 2025. This adds weight to the argument to have a local plan for 15 years and then to refresh it, and then include the obsolete power station site as a major future brownfield redevelopment opportunity.
23. The Council should show real ambition and leadership to reflect public opinion on protecting the environment and reusing available brownfield in advance of greenfields.

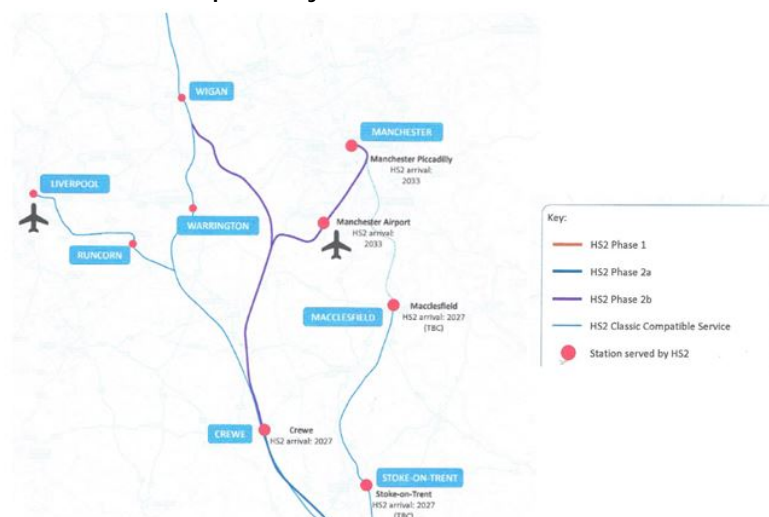
Objective W 4

24. CPRE Cheshire supports the Objective W4: To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.

Policy INF1 - Sustainable Travel and Transport

25. Policy INF 1 must be effective at reducing our road reliance and the harm to economic, social and environment from frequent road congestion causing diversion of traffic from the M6 to the rural road network must be fully understood, for example there is a problem with lorry traffic being diverted from Winwick Lane, through small villages.
26. The Council needs to be more ambitious about decarbonising and truly face up to the problem caused by congestion on the Motorway and highway network and plan to reduce the demand for road based journeys.
27. CPRE supports a modal shift from road to rail. However it is concerned over the lack of robust evidence of need for HS2 and spiralling costs. We opposed the location of stations in Green Belt locations, believing rail should serve centres of population to be sustainable.

Extract: From HS2 publicity of HS2 route



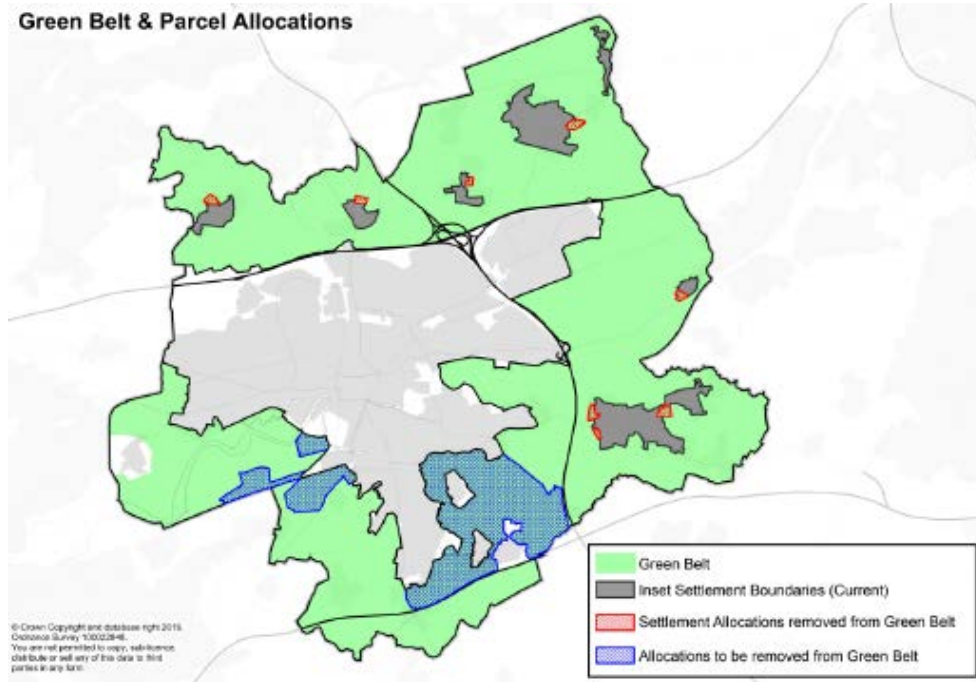
28. The case for Northern Powerhouse Rail is much stronger than that for HS2, due to a lack of funding in Northern rail infrastructure, compared to elsewhere, over the years. Economic growth needs investment in the connectivity between Liverpool, Sheffield, Leeds and Hull. We cannot rely on only good connections to the capital.
29. CPRE Cheshire supports the Council's opposition to the Golborne Link because it is of no benefit the Borough, or its residents, and will have a negative impact on existing businesses, plus leave Warrington with a worse rail service. CPRE Cheshire thinks that HS2 should arrive at Crewe and then proceed up the West Coast Mainland.
30. For information, CPRE Cheshire is opposed to the application reference 2018/32514 by St Helens Council, for permission to build an access road to the Parkside Colliery site. Although we support the reuse of the Parkside Colliery, it is believed a new road will harm the Green Belt and jeopardise the Strategic Rail Freight site. The expansion of Liverpool Superport needs some form of rail freight connectivity. London's equivalent port can transport 40% of freight on rail, whereas Liverpool is low at 2%. In our view it is wrong to plan for more road based HGV haulage at the expense of future rail.
31. CPRE Cheshire does want to see more sustainable travel, walking and cycling and much better connected and reliable public transport use in the future to reduce reliance on vehicles and associated noise and air pollution. Air Quality Management Areas should be monitored and action to reduce harmful impacts by reducing emissions. Developers must be required by sound policies to bring forward adequate infrastructure.

Policy GB1 - Green Belt

32. CPRE Cheshire remains strongly opposed for any unnecessary release of the Green Belt and therefore we strongly object to the proposals to release land at:
- Warrington Waterfront
 - Garden Suburb
 - South West Urban Extension
 - Land at Burtonwood
 - Land at Croft
 - Land at Culcheth
 - Land at Hollins Green
 - Land at Lymm
 - Land at Winwick

33. The following extract map shows how significant in scale the Green Belt release would be.

Extract: Council's excessive Green Belt proposals



34. We recommend the proposal to release Green Belt is removed from this Policy.

35. The text in the second part of the paragraph under point 8 is not in line with policies for Green Belt as set out in the National Planning Policy Framework, and therefore we recommend it is deleted. "8. Within these settlements development proposals will be subject to Green Belt policies set out in national planning policy. ~~New build development may be appropriate where it can be demonstrated that the proposal constitutes limited infill development of an appropriate scale, design and character, unless the infill break contributes to the character of the settlement.~~" Paragraph 10 appears to be a duplication of the first sentence in Paragraph 8 and should therefore be deleted.

Policy TC1 - Town Centre and surrounding area

36. The density for the Town Centre at 130 dwelling per hectare and 50 dph in masterplanned areas is welcomed.

Policies Relating to Objective W4

37. Policies relating to Policies Relating to Objective W4

Policy ENV5 - Energy Minerals

38. CPRE Cheshire is pleased to see Peat extraction will not be supported in line with Government commitments on a net zero carbon future.

Main Development Areas and Site Allocations

Policy MD1 - Warrington Waterfront

39. CPRE Cheshire is supportive of the principle of focusing some development at Warrington Waterfront as a multi-modal port facility and a business hub. However, we are opposed to the two employment sites being removed from the Green Belt. The justification to release Green Belt land is based on economic growth rates that are too high.

Policy MD2 - Warrington Garden Suburb

40. CPRE Cheshire is opposed to the loss of Green Belt for a Garden Suburb.

Policy MD3 -South West Extension

41. CPRE Cheshire is opposed to the loss of 112 hectares as set out in Policy MD3 - South West Urban Extension. As set out above we do not agree there is a justification to release Green Belt land on the grounds of 'exceptional circumstances.

Policy MD4 - Land at Peel Hall

42. Peel Hall 69 hectare greenfield site should be kept for agriculture and the benefit of future generations. The benefit of keeping it as it exists is important for future generations.

Policy OS1 Burtonwood

43. CPRE Cheshire is opposed to the land to the north of Burtonwood to be removed from the Green Belt and allocated for residential development for 160 homes. We prefer to see use brownfield land used for this purpose. The benefit of keeping it as it exists is important for future generations.

Policy OS2 Croft

44. CPRE Cheshire is opposed to the land to the north east of Croft to be removed from the Green Belt and allocated for residential development for a minimum of 75 homes. The benefit of keeping it as it exists is important for future generations.

Policy OS3 Culcheth

45. CPRE Cheshire is opposed to the proposal to release land east of Culcheth from the Green Belt and allocated for residential development for a minimum of 200 homes. The benefit of keeping it as it exists is important for future generations.

Policy OS4 Hollins Green

46. 1. CPRE Cheshire believes the land to the southwest of Hollins Green should not be removed from the Green Belt and allocated for residential development for a minimum of 90 homes. The benefit of keeping it as it exists is important for future generations.

Policy OS5 Lymm - Massey Brook Lane

47. This site ought not to be removed from Green Belt. It is unjust and the negatives would outweigh the benefits.

Policy OS6 Lymm - Pool Lane

48. This site ought not to be removed from Green Belt. It is unjust and the negatives would outweigh the benefits.

Policy OS7 Lymm - Rushgreen Road

49. This site ought not to be removed from Green Belt. It is unjust and the negatives would outweigh the benefits.

Policy OS8 Lymm - Warrington Road

50. Land to the east of Lymm should be retained as Green Belt and not allocated for residential development for a minimum of 200 homes and a new health facility.

Policy OS9 Winwick

51. This site ought to be kept as Green Belt. It is unjust to release it due to the development projection assumptions being flawed. When considering the planning balance, the harms would outweigh the benefit.

Summary

52. If you require any further information relating to this response please contact me without delay.

Yours sincerely

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