

# Response to Warrington Borough Council Local Plan Preferred Development Option Regulation 18 Consultation July 2017

## Introduction

It is too difficult for me to structure my response to the Preferred Development Option Consultation into the questions provided so I hope you will accept my comments in the form of this document instead. Where possible I will attempt to link what I'm saying to the specified consultation questions. I'll start by looking at the overall objectives and strategy, followed by the broad options of the plan. I'll finish by focussing in on my specific local area.

## Requirements, Objectives and Overall Strategy

Related Consultation Questions:

1. Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?)
2. Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?
3. Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?
4. Do you agree with the new Local Plan Objectives?
7. Do you agree with our Preferred Development Option for meeting Warrington's future development needs?
13. Do you agree with our approach to providing new employment land?

Regrettably I have to disagree with the overall objectives and strategy of the Local Plan, particularly objectives W1 and W2. The whole plan seems to be predicated on the idea of growing Warrington into a 'New City' as fast as feasibly possible by large scale development on greenbelt land. It seems to me that such a plan would need a specific mandate from the people of Warrington ideally through a public referendum. To my knowledge this was not even discussed publicly at the last local elections so I don't believe that the Council has such a mandate at this time.

I also do not believe that Warrington has any obligation to its neighbours to attempt this level of growth. Part of the reason for Warrington not having enough Brownfield sites now is due to having built over 4000 more houses than its target in the first part of this century which likely pulled people away from neighbouring areas. It does not therefore seem unreasonable now for Warrington to slow down for a while and let neighbouring areas take up the slack. From the notes in the consultation document regarding 'duty to cooperate' discussions it seems that neighbouring areas are far more concerned about excess growth in Warrington than the reverse.

In my opinion Green Belt release should be used only as an absolutely last resort to meet the essential needs of Warrington's residents when all other options have been exhausted and I believe objective W2 should be replaced with something to that effect. I strongly disagree with the level of Green Belt development in the plan. I believe doing this will be very harmful to Warrington and that if this is the price of Warrington becoming a city then such an ambition must be abandoned. I therefore consider that objective W1 should be replaced with a wording to the effect of meeting Warrington's housing needs and that any housing target within it should be symmetric rather than a minimum.

In terms of numbers I consider the proposed housing target of 1113 per year to be well in excess of what Warrington's actual needs are. The consultation uses an OAN of 839 houses per annum however I believe this to be too high. I've been told that a more recent report (based on 2014 rather than 2012 data) gives an equivalent figure of 738 with 679 as a lower bound. I've also been told that ONS figures likely to underpin the government's proposed formula for calculating housing need would suggest an OAN of 716. Focusing on an OAN at this level and abandoning the ambitious growth plans looks like it would reduce the housing requirement over the plan period by about 8000 almost totally negating the need to release Green Belt for housing.

On the question of employment land I don't have much expertise and it's difficult for me to judge the numbers used but I'm very sceptical they need to be as high as they are. In my personal experience in the Daresbury and Runcorn areas there are a considerable number of empty offices and industrial units and development of the new Daresbury science park seems to have slowed to a crawl presumably due to lack of demand at the current time. It seems to me that the Council should be very cautious in any plans for employment land in the short to medium term.

Longer term I don't know but it seems that the ambitious 'New City' plan is likely inflating the estimates of land needed for employment as well. I've already said that I believe this should be abandoned and replaced with much more of a focus on the needs of Warrington's residents. It would be bad if Warrington didn't have enough jobs to support its populace but as I understand it Warrington currently has far more jobs than residents so this doesn't seem likely to happen.

I'd like the same principles applied to employment land as I suggest for housing – relatively free growth if it can be accommodated on Brownfield sites, but Green Belt release only to ensure that natural demographic growth of the populace does not mean that Warrington cannot employ its own residents.

Looking back at the wider picture I believe a plan period of 20 years is too long especially for any plans related to housing. Whilst the specifics remain very unclear it is certain that last year's Brexit vote will have a big impact on both the economy and on migration and hence need for land for employment and housing. Personally I'd expect it to reduce the need for both.

There also seems to be the possibility of new large Brownfield sites becoming available for regeneration within the next few years. The consultation mentions the expected closure of Fiddler's Ferry Power station and I've read that there is a possibility that Warrington Hospital will move and free up its current site.

It seems to me that it would be better to plan for a 10 year period with development focussed on currently available Brownfield sites. This would reduce risk from bad predictions due to Brexit and would enable new large Brownfield sites to be used earlier if they become available; possibly avoiding any need to build on Green Belt in Warrington for the next 20 years.

## Spatial Options and Main Development Locations

### Related Consultation Questions:

5. Do you have any comments to make about how we've assessed different Spatial Options' for Warrington's future development?
6. Do you have any comments to make about how we've assessed different options for the main development locations?
12. Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Needing to build on Green Belt at the proposed scale means that there are no good options in my opinion. Of the high level spatial options presented Option 1 seems to be the least worst. The vastly greater size of the urban area means that the same numbers would not have the same transformative effect. Infrastructure is likely to be easier to provide too due to economies of scale, generally lower land prices and flexibility introduced having services closer together.

If there has to be any Green Belt release in the outlying settlements then it should only be to meet the particular needs of that community when all non-Green Belt sites are exhausted. This should however be an arrangement of those communities 'pulling' some allocation from the urban core rather than central planners 'pushing' a Green Belt target onto them.

I strongly disagree with the idea of having disproportionate development in the outlying settlements at the start of the plan period to compensate for slow start-up of extensions to the urban area. This will amplify the rate of growth of these areas which will make it much harder to identify any infrastructure problems before they become acute. There is also the likelihood that of causing uneven demand on schools. In Lymm (and I'd expect the other settlements to be the same) a disproportionate number of new arrivals will be families with small children looking for somewhere to bring them up meaning that any new housing development will put maximum pressure on primary schools in the early years of its operation which will then likely drop off. A few years later the same effect will occur at high school level. If development is spread evenly over time there will be less peaks and troughs in school demand which would mean lower maximum capacities needed and less ramp up/ramp down issues. Uneven development may also have a distorting effect on the local housing markets in these places.

If there is a need for smaller sites at the start of the plan period then I think it would be better to find locations adjacent to the main urban area, preferably in areas where other development is lightest.

Looking at the proposals for the main development locations I feel the current proposals place a disproportionate amount of development in the South East of Warrington. The Garden City Suburb is by far the largest of the main development areas and nearly half of the growth allocated to 'Outlying Settlements' is allocated to Lymm. Contrast this to the minimal development planned in the North West of Warrington. If there has to be building on Green Belt then the planned areas to the south west of Warrington are probably the least-worst of what is proposed. Assuming the new Western link is built then the road situation should be ok and the A56 provides a good link to the motorway and to employment areas in Daresbury and Runcorn.

Overall I think the Council needs to seriously think about an 'Option 7' for development locations as a hybrid of options 4 and 5 and to compare this with the other options including a criterion of fairness to the different regions of Warrington.

## Proposals for Lymm

### Related Consultation Questions:

12. Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

As I understand the proposals for Lymm are for 600 new houses in the first 7 years or so of the plan – 100 houses on SHLAA urban area sites with another 500 on Green Belt sites. I'm strongly opposed to this combination of numbers and timescales. This is over 12% growth in the number of houses in Lymm over a 7 year period which seems significantly more than 'incremental growth' to me. In the section above I've already explained that if development is not spread evenly I expect it to result in a steep peak in demand for school places (since I expect a disproportionate number of new arrivals to be families with small children) and will not allow time for unforeseen infrastructure issues to be identified and addressed.

The settlement profiles document shows that Lymm's GP surgeries are at capacity, primary schools are near capacity and secondary school is at capacity. The proposal talks about a new medical centre and expansion of primary schools however this will take time to plan and execute with all kinds of potential for delays. Front-loading the development in the first few years of the plan leaves no time to do this.

There are likely to be other infrastructure issues too. The document shows that the Leisure centre is near capacity and doesn't appear to have attempted to assess dentist capacity which I'd also expect to be a problem.

Even with a smoother timescale the number of houses proposed for Lymm seems too high to me. No account seems to have been made for Lymm's proximity to the proposed Garden City Suburb. It seems to me that such a large amount of new housing nearby will reduce demand in Lymm relative to the other outlying settlements and that the number of houses proposed should be reduced because of this. Objective W5 talks about protecting the character of the settlements and I think that this is a particular concern in Lymm now that it has reached its current size.

The only type of housing that Lymm may need is smaller/'affordable' housing and I would expect that the 100 or so capacity of the SHLAA urban sites should be plenty to provide these for the immediate future especially if the capacity of those sites has been assessed based on larger houses (and could therefore be increased if the houses are smaller). Certainly it does not need any more large townhouses and so-called 'executive homes' since very many of these have been built in recent years. Whilst it doesn't have huge quantities of flats there always seem to be some for sale (generally for long periods) so I doubt there's any need for more of those either.

I don't believe there needs to be any Green Belt release in Lymm at the present time and even if some is needed in the future this should wait until the SHLAA urban sites have been developed otherwise there is a danger the Green Belt developments will out-compete them due to lower costs.

## Infrastructure Issues and Site Choice in Lymm

### Related Consultation Questions:

12. Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

The process and timescale for arriving at site choices in Lymm isn't very clear to me but I was advised at one of the consultation events that if I had any comments related to appropriate sites I should include them in my response to this consultation.

As far as factors go availability of Primary School places is clearly an issue and the settlement profiles document recognizes that only Statham C.P has any current capacity and that only Statham and Cherry Tree have potential for expansion.

Another serious issue is the local road network which seems to have had only minimal consideration so far. The document claims that there are no serious problems at peak times. Depending on how you define serious this may be true however there are definitely a number of key pinch-points in the local road network and I do not believe these have the capacity to absorb several hundred more cars at peak times.

A key feature of Lymm is that the Bridgewater Canal cuts it in half. There are a number of crossings but only the two in the centre of Lymm support two-way traffic and both of these funnel into a single mini roundabout at the intersection of Brookfield Road and Eagle Brow (Rectory Lane does provide an alternative for traffic from one but this is very narrow and has a very difficult junction with the A56). The crossing at Oughtrington is single-lane and is the approach to Lymm High School from the north. It can get very busy at times. Events at St Peter's Church or at the Cricket club can also result in a lot of parked cars on Oughtrington Lane effectively rendering that section single lane at those times. The crossing between Heatley and Agden is also single lane and is limited by the traffic lights for Stage Lane and Bradshaw Lane. This is also prone to flooding and can be out of action for days when this happens.

The assessment of routes to the motorway in the settlement profiles document is naive in my opinion. The real route to the motorway for most of Lymm (excluding maybe Broomedge) is to J20 along the B5158 Cherry Lane/Elm Tree Road. Cherry Lane itself isn't really a problem but the junction between Elm Tree Road and the A56 gets congested as does the nearby junction between the A56 and Eagle Brow. Development of new employment land at J20 will only increase the proportion of Lymm residents commuting this way. Most of the Lymm commuter traffic that does not take Cherry Lane will be heading for the A56 to head either East or West.

Any large new development in Oughtrington or Heatley is likely to result in hundreds more commuters trying to cross the Bridgewater Canal to get to the A56 and/or the Motorway. A proportion will also be taking children to Lymm High School creating even further pressure at the Oughtrington Lane crossing. If these crossings become excessively congested then I do not see any easy way they can be upgraded. It may also increase traffic at Warburton toll bridge which already has a serious congestion problem at peak times. On that topic it's also worth noting that when there is a problem on the Thelwall Viaduct (M6) very large amounts of traffic divert down the B5169 (Mill Lane and Burford Lane) to reach Warburton bridge resulting in the entire road coming to a virtual standstill northbound. Any new development that connects to this side of this road is likely to end up effectively cut off in this situation.

From an infrastructure perspective it would seem to me that the least problematic sites are those on Cherry Lane. New developments there would increase traffic at the motorway roundabout but that will happen with any new development in Lymm. Most commuter traffic will not need to go into the centre of Lymm or cross the Bridgewater canal and any that uses the A56 will at least be in the opposite direction to the main flows at the end of Elm Tree Road. Expanding Cherry Tree C.P would also ensure there are nearby primary school places.

It's also worth considering that the reason Oughtrington C.P (despite expansion in 2010) and Ravenbank C.P are full are that most of the new development in the last couple of decades has been on the Eastern side of Lymm either in Oughtrington, Heatley or up near Lymm High School.

In my opinion the best approach to new development in Lymm is to have a larger number of smaller sites spread around the area but with a bias to the West and South sides spread evenly over the 20 year plan period and with individual timings chosen based on availability of primary places. If there must be larger developments then these should go on one of the sites to the southwest of Lymm and Cherry Tree C.P should be expanded first. Either way the proposed new medical centre needs to be operating before any new development of even moderate size.

Another piece of infrastructure that doesn't appear to have even been considered is sewers. I cannot speak for the rest of Lymm but the sewers in Heatley are in poor condition and frequently need to be flushed out. I doubt they could take many more houses being added. Sewer condition/capacity needs to be assessed and considered when choosing sites.

## Specific comments regarding Heatley

### Related Consultation Questions:

12. Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

I live in Heatley and have some specific concerns about the Green Belt assessments of the sites here since I fear that a simplistic approach to site allocation based purely on final Green Belt rankings could result in the majority of the development allocated to Lymm occurring here which I do not believe would be the right thing to do for those who already live here or for the new residents.

I'm particularly concerned about site R18/107 (in parcel LY14). These fields surround Heatley Flash on 3 sides and connect it to the countryside. Heatley Flash is important to the local community for several reasons. Firstly it is important as a wildlife site. As I understand things it is used by migrating Canadian Geese in addition to its resident wild birds – certainly you do get Geese in the area at some times of year and there are a wide variety of wild birds around. I've been told that there are Newts there though I have no evidence to support or refute this. Secondly it is a popular fishing spot. Finally in its current surroundings it is a location of considerable beauty. Obviously this is just my opinion but spring sunsets over the Flash are particularly special and in the local area only Lymm Dam can compare. Developing the site would result in the Flash being surrounded by houses which would certainly spoil its beauty and would likely harm its other roles too.

A little to the south of Heatley Flash (and within the site itself) is Heatley Pond (also known as 'Little Mere' by the anglers). This is only small but is also a wildlife site, fishing spot and scenic location.

A well used footpath crosses the southern fields. In combination with Oughtrington Crescent and part of Wet Gate Lane it provides a scenic link between the Bridgewater canal and the Trans-Pennine trail with some incredibly open views of the countryside to the east. East of Oughtrington the canal is raised above the land so these fields also contribute to the view from there for walkers who stay on the towpath.

Looking at the Green Belt assessment I'm surprised that it's rated 'None' for Purpose 2 (Prevent neighbouring towns merging into one another) rather than 'Weak' like the two other sites in Heatley. It looks to me that it would extend the settlement boundary towards Partington (if not in its own right then by bringing the existing houses on Mill Lane within the settlement) and towards Dunham, Little Bollington and Bowdon. I accept that even if this was the case it would still leave the final rating to be decided by professional judgement.

Your methodology for Purpose 3 (To assist in safeguarding the countryside from encroachment) includes a question of beneficial uses which seem to clearly apply here. There is no indication that this has been considered in assessing this site. I appreciate that the rating is already 'Strong' for purpose 3 however this still needs to be considered as part of the final judgement call. Other sites in Lymm with the same ratings on the individual purposes have been ranked as making a strong contribution overall purely on the strength of their contribution to this purpose and I think there is a case for making the same judgement here.

Something else to consider is that Heatley, like Broome Edge has always been a distinct village from Oughtrington. It had its own post office at one time and has always had a distinct much more rural character. Fully developing this site would completely merge Heatley into Oughtrington and because

of the size would completely lose Heatley's rural character. This does not really fit into your methodology very well but seems important in regard to the fundamental purposes of Green Belt and in my opinion should be considered as part of the professional judgement.

If it is possible I request that you review the Green Belt assessment of parcel LY14 and site R18/107 and consider whether it should instead be classified as making a strong contribution. If this is not possible and/or the final rating stays the same please at least consider these points when comparing this site to others in Lymm.

I also ask you to check the assessments of parcel LY13 and site R18/094. It looks to me like you have a site that takes up an entire parcel but is rated 'weak' when the parcel is rated 'moderate' which seems rather odd.

Moving back out to Heatley as a whole I'd also make the point that the Heatley area suffers from subsidence due to brine extraction many years ago. As I understand it this method of extracting salt from the ground is very imprecise and no-one really knows where the ground was affected. This is something that any new development here would need to take into account.

One final thing that I'd like you to consider is that HS2 passes through the edge of Heatley and construction work will probably begin in 6-7 years time or so. If the local plan results in large scale house building here in the next few years it will probably run up to the start of this. This would mean that the residents of Heatley could face continuous construction work for over a decade. That is an awful lot for any community to be expected to take.

## Conclusion

It should be clear from my response that I disagree with much of what is proposed. Please understand that as I've worked my way down to the specifics I responded to the plan as it is rather than how I hope it might change so please don't take my assumptions in later sections to be contradictory to my expressed opinions in earlier ones.

I appreciate this is quite long and thank you for taking the time to read it.

