



7th September 2017

Director of Planning
Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA4 2NH

Dear Sir

**Warrington Borough Council Local Plan Preferred Development Option
Regulation 18 Consultation July 2017**

With regard to the above proposed development option; as I understand the position, the major intervention proposed in the draft plan is the development of a new Garden City Suburb comprising more than 7,000 new homes and 116ha of employment land between Knutsford Road and London Road linking the existing urban area to the M56. This new development will almost exclusively be on land currently protected as green belt. You also propose to protect for future development, land currently allocated as green belt, east of Knutsford Road and the M6, with the potential to accommodate a further 1,800 homes.

The draft local plan acknowledges that Warrington’s roads, schools and health facilities are currently at capacity and that a development which could accommodate something of the order of 30,000 people and 13,000 cars plus commercial traffic could not be feasible without significant investment in both transport and public services.

I have a number of reservations about the Preferred Development Option

1. Release of green belt land

The 2012 Local Plan Core Strategy, prepared by Warrington Borough Council sets out the aims of:

- protecting the green belt
- developing sites and services in locations accessible by public transport
- accommodating 80% of development on brownfield land
- reducing the impact of traffic on air quality

The proposed Garden City Suburb does not appear to meet any of the 2012 criteria and it is not clear from the current plan why such a major departure from these policies is justified.

The 2012 plan envisages maintaining the green belt until at least 2032 with a view to preventing urban sprawl, focusing investment in the urban area to facilitate regeneration and to prevent adjoining towns coalescing. These objectives remain of critical importance and the preferred development option does not provide sufficient justification to make the major changes envisaged to the green belt.

2. Protection against air pollution provided by the green belt

The recognition of the effect of poor air quality on public health means that maintaining the green belt is even more important now than it was in 2012. The green belt provides an important protection against the pollution coming from the motorways surrounding Warrington. The preferred development option would effectively remove this protection from pollution from the M56 and M6.

3. Provision of new transport infrastructure and public services

My understanding of the Government's Garden City programme is that the initiative is based on the concept of sustainable development. It is hard to see how the proposed development of a huge new suburb, which is separated from its town centre by the major barrier provided by the ship canal and provides no access to public transport infrastructure can meet these sustainability criteria. Development of this scale should at the very least provide easy access to the rail network as a viable alternative to the use of the car.

The preferred development option recognises that strategic road infrastructure and a new crossing of the ship canal may be required but is vague on the any details. The plan further suggests that no development of the garden city suburb will take place until a new strategic road is provided. I am skeptical that these proposals will survive contact with market reality as the new strategic road and bridge infrastructure will be a significant cost to the public sector in a time of austerity, whereas for owners whose land has been removed from the green belt there will be a huge financial incentive to work the planning system to ensure the early release of their land for development. There is a real risk therefore that the Garden City Suburb allocation will place intolerable pressure on roads and public services which are already operating at capacity.

4. The effect of the preferred development option on local communities

Finally and most significantly, the preferred development option would fundamentally alter the nature of Grappenhall, Thellwall, Appleton Thorne and Appleton. There would be a real risk that they would lose their local character and simply become part of a gigantic area of urban sprawl. The reason many people choose to live in these areas is precisely because of this local character and your proposals will have a very real and negative effect on their quality of life.

In the light of the real problems with this preferred development option I would urge you to reconsider your proposals. However, if the release of green belt land can ultimately be justified, surely it would be more sensible to allocate development on the town centre side of the ship canal and where, at the very least, ready access can be gained to the rail network.

I hope that you find the above comments both helpful and constructive and would be grateful if you would keep me informed of the Councils response to the consultations.

Yours faithfully

[Redacted signature]

[Redacted name]

[Redacted address]