

To Warrington Borough Council

Re Local Plan Review - Preferred Development Option Consultation.

My review comments are as follows...

1. **Loss of Green Belt Land:** This is an overall objection to the loss of Green Belt land which has been categorised as such precisely to prevent the proposed 'urban sprawl', the loss of countryside, and the loss of individual villages such as Thelwall & Grappenhall. There is no exceptional rationale provided in the proposals that justify this loss of Green Belt land. The impact to the local environment and habitat will be catastrophic, and far greater justification needs to be provided that there is absolutely no alternative.
2. **Objectives & Exceptional Circumstances:** This is an objection to the Council's statement to achieve the "strategic objectives, the Council considers that the exceptional circumstances can be demonstrated to justify the release of Green Belt". There is no rationale provided of these 'exceptional circumstances', and the statement is fundamentally flawed given the majority of the 'strategic objectives' are for protection of the environment and Green Belt rather than the destruction of it, as follows...
 1. Objective W2: "To facilitate the sensitive release of Green Belt land to meet Warrington's long term housing and employment needs, whilst ensuring the revised Green Belt boundaries maintain the permanence of Warrington's Green Belt in the long term." - This is an objection that the preferred option is not a 'sensitive release' nor does it 'maintain the permanence of Warrington's Green Belt'.
 2. Objective W5: "To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, its unique pattern of green spaces and its constituent settlements whilst protecting, enhancing and embracing the borough's built and natural assets." - This is an objection that the preferred option does not 'reinforce the character and local distinctiveness of Warrington's countryside', it does not 'reinforce the unique pattern of free spaces' and does not 'protect, enhance and embrace the borough's natural assets'.
 3. Objective W6: "To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution on improving Warrington's air quality." - This is an objection that the preferred options does not 'minimise the impact of development on the environment'.
 4. Objective W1: "To enable the transition of Warrington from a New Town to a New City..." - This is an objection that I do not share the aspiration to be a 'New City'.

3. **Commitment to Maintain Green Belt:**

1. This is an objection that the Council is not adhering to previous commitments to maintain the permanence of the Green Belt as per the current Local Plan. According to the Warrington Local Plan Core Strategy adopted by the council on 21 July 2014 it states "To maintain the permanence of the Green Belt and the character of the countryside in the borough and protect them from inappropriate development. The general extent of the Green Belt and the detailed boundaries as indicated on the Local Plan Core Strategy Policies Map will be maintained for as long as can be seen ahead and at least until 2032." Why is the Council reneging on this promise? Does this also mean that residents cannot trust any promises made in any 'new' local plan?
2. In addition, the current Local Plan states "Since the end of the New Town era, strategic planning policies sought to arrest outward growth of the Town partly through recognition that it was nearing its natural limits to expansion and partly through recognition that the New Town development had remarkably little effect on the older urban areas of Inner Warrington. Recent efforts to date have therefore focused on regenerating and 'restructuring' the older core of Warrington Town". I agree that the Town is nearing its natural limits to expansion so why does the new preferred option go way beyond its limits? I also agree the focus should be on centralised regeneration so why does the new preferred option not focus more on this? Again why is the Council reneging on this viewpoints? Does this again also mean that residents cannot trust any promises made in any 'new' local plan?
4. **Preferred Option:** This is an objection against the selected preferred option, and that Option 5 much better meets the strategic objectives as a whole. Option 5 much better meets 3 of the Strategic Objectives (W2, W5 & W6), and it still meets objective W3. More investigation is required to look at all alternatives to develop existing infrastructure to meet objective W4 rather than destroying Greenfield land. Finally Option 5's primary downside appears to be achievement of the aspiration to be a 'New City', objective W1, which is an objective I strongly disagree with and object to.
5. **Centralised Development:** This is an objection that the development of homes should not be decentralised as per the preferred option. Rather the Council should look more to centralised development in the Town centre to increase density and build upwards rather than outwards. The right investment will create a high quality town centre that will create demand for people to live in. This is a far more attractive proposition than the destruction of natural assets with the Council's currently preferred option.
6. **Economic Aspiration:** This is an objection to the economic growth aspirations. The aspiration appears to be driven by the Council rather than a government directive, and as a resident I do not share this aspiration. The aspiration should be reduced to a level that prevents demand for houses on Green Belt land.

7. **Equality of Impact:** This is an objection that the development does not consider equality of impact across the whole of the borough, rather it's negative impact is very much focused on a few areas.
8. **Agriculture Impact:** This is an objection that the proposal does not consider the impact on the reduced availability of agricultural land and the future ability of the borough and areas beyond to meet food demand. Much of the land proposed for development is not just 'spare' but rather is used for agricultural purposes.
9. **Requirement for such Volume of New Houses:** This is an objection about the lack of evidence that such volume of new houses is required in the Warrington area in light of recent political changes, e.g. Brexit. The estimates need to be revisited to provide greater certainty these are accurate. In particular...
 1. This is an objection that calculations do not reflect the percentage of businesses that will just relocate within the borough to newly developed land, leaving the old ageing property unused. This will not result in a net increase in jobs and in turn housing requirements.
 2. This is an objection that the plans are based on an acknowledged fact that the needs do not account for the existing population who are currently unemployed not working but who could take up new jobs in the future. This could be a significant number that will invalidate many assumptions the proposals are based upon.
10. **Safeguarded Land East of A50:** This is an objection to change of the Green Belt land to 'safeguarded', which appears to be a very confusing and misleading term. The best way to safe guard the land is to leave it as Green Belt.
11. **Requirement for a New Strategic Road to the East of A50:** This is an objection to the lack of justification (e.g. 'As Is' traffic data and 'To Be' traffic modelling) that a new strategic road is required in this location. From personal experience this will not alleviate any current traffic problems and alternative solutions appear less intrusive to meet future demand.
12. **Alternatives to a New Strategic Road to the East of A50:** This is an objection to the lack of analysis regarding whether alternatives can better meet requirements that minimise impact to green belt land. Alternatives include:
 1. Better utilisation of current public transport capability
 2. Provision of new public transport services (such as rail / tram services).
 3. Promotion of non vehicle / green transportation.
 4. Development of existing road infrastructure on the A50
 5. Development of existing road infrastructure on the A56
 6. Development of existing road infrastructure on the A49
 7. Development of existing road infrastructure along Broad Lane.
 8. Development of existing road infrastructure along Ackers Road.
 9. Development of any new required roads, if absolutely required, on land that has to be developed for residential purposes (i.e. to minimise impact to Green Belt land).
 10. NOTE: To the layman the most obvious solution to any increased traffic caused by the Garden City Suburb on the East side is to improve

transportation along Broad Land and access at the end to the A56. This will better utilise existing infrastructure rather than destroying our countryside.

13. Use of 'Safeguarded' Land for a New Strategic Road to the East of A50: This is an objection to using what is supposed to be safe guarded land for a new road. How can this be safe guarding it?

14. Use of 'Strong Contribution' Green Belt for a New Strategic Road to the East of A50:

1. This is an objection that if green belt absolutely has to be used, with full justification there are no alternatives, then why use green belt land that has been categorised as making a 'strong contribution'. Full analysis of the alternative routes needs to be provided.
2. In addition, the Council has stated on their website that they will "ensure the focus of release is on those parts of the green belt that are performing poorly". Given the current preferred option is developing a new Strategic Road on Green Belt that is performing 'well' and making a 'strong contribution', then the revised plan needs to look at options to use alternative land that is performing 'poorly'.

15. Brownfield Development: This is an objection to the lack of transparency regarding the encouragement and incentive for developers to submit proposals for brownfield development (they are always going to submit proposals to develop on land that is easiest and cheapest to develop, and will offer the greatest return, which is often Greenfield). This is also an objection that in point 4.61 in the preferred option proposal it appears there are potential brownfield developments that have not been included in the preferred option. There is no way any use of Green Belt land can be justified until this brownfield land is developed.

16. Use of a Footpath for a New Strategic Road to the East of A50: This is an objection that 'should' justification be provided that a new road is required in this area then it should follow an existing road (e.g. Cinder Lane) rather than destroy current fields.

17. Loss of Properties for a New Strategic Road to the East of A50: This is an objection that the current proposed route across Weaste Lane utilises a current footpath between properties and therefore will require destruction of houses and the loss of constituent's homes. 'Should' justification be provided that a new road is required then there are very similar routes that will prevent the loss of homes on Weaste Lane.

18. Impact of a New Strategic Road to the East of A50: This is an objection that any new road will result in:

1. Visual impact
2. Noise
3. Reduction in Air Quality
4. Negative impact to supposedly 'protected' wildlife and natural habitat
5. Pollution
6. Flood risk
7. Loss of the rural character of the area.
8. Loss of privacy

- 19. Homeowners in Limbo During Plan Development Due to New Strategic Road to the East of A50:** This is an objection that currently homeowners are now in limbo about whether their homes will need to be demolished for this new road. As a homeowner whose home will need to be demolished based on the preferred option this uncertainty is very distressing and makes my home unsaleable during the plan development period, and perhaps beyond depending on the finalised plan.
- 20. Community Engagement:** This is an objection to the whole process used to develop a new local plan, the level of community engagement has been entirely inadequate, therefore this is a challenge to the validity of all stages of the process to date. This is evidenced in that there were so few responses to previous consultation phases, phases I never knew anything about, and that the majority of responses were property developers, which given the scale of change proposed clearly shows that this was not communicated to the residents the Council is supposed to serve.
- 21. Funding / Speculative Investment:** This is an objection to the lack of transparency over the funding and ownership of land or property in the preferred option, and the concern that the council will use cheap borrowed cash to fund a high risk bet on the returns.

