

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?

In your local plan (LP) you state that you do not consider existing residents who are currently not working but who could take up new jobs in the future. You note this is an important consideration as such residents do not put the same demands on housing need as people moving into the area. You note that the Experian forecasts are considered the most robust forecasts for Warrington, however, no consideration have been given to the impact of Brexit on economic growth in Warrington. Warrington is highly dependent on trade with the EU, is likely to be significantly impacted. For example, [REDACTED] is already experiencing significant downturn as major projects are either being postponed or cancelled due to the uncertainty over Brexit – leading to a first round of redundancies. [REDACTED] a major employer has also left the North West of England. Many [REDACTED] employees live in Warrington and are having to relocate, hence freeing up housing stock. You note that technological advances will affect distribution centres and public sector, but automation and artificial intelligence will soon have a significant impact on the private sector employers, such as engineering companies.

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?

No consideration has been taken in the 20 year time frame of the expected shut-down of the Fiddler's Ferry coal fired power station and proposed redevelopment of the Warrington hospital site. This would release significant brownfield development capacity. In Scandinavia, they follow a very successful mixed-use development model incorporating housing above retail and leisure complexes. Currently these complexes are 1-2 storeys. An additional 1-2 storeys of housing would provide significant increased levels of housing, which could also include affordable housing options. This has not been considered.

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

The approach to the LP is fundamentally flawed. Warrington Council have approached landowners and developers to put forwards sites for development. Clearly the driving force behind this is to make significant profits. For some farmers this amount of money is way beyond anything they could possibly dream of – why would they not agree to this? Developers will make millions of pounds – lining the purses of a few individuals to the detriment of entire communities – both human and ecologically. It must be noted that the council will benefit significantly financially from fees related to planning and building approvals as well as council tax fees from new housing.

In the following response, I would like to include evidence from the Campaign for Rural England, as I believe that the development of Green Belt is not permitted. There is already considerable loss of Green Belt from the proposed HS2 route, this LP does not reflect the route in its proposals for releasing Green Belt land. Green Belt land should only be developed in exceptional cases, economic growth is not in itself an 'exceptional case'. In

March 2017, Prime Minister Teresa May declared that protecting the Green Belt is 'paramount'.

If we loosened Green Belt controls or de-designated large areas of it, we would simply allow more land to be built on, where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Ireland and Spain.¹³ There is plenty of other, more suitable land that could be built on, and it could be used more effectively. In 2014, a CPRE report found that there is enough suitable brownfield land, available now, for at least one million new homes.¹⁴ It also demonstrated that brownfield land is not a finite resource. It is constantly being replenished, and a CPRE analysis of new 'brownfield registers' produced by 53 local authorities in October 2016 found that 11% more housing could be provided on brownfield sites in those areas compared to 2014¹⁵. Usually, many more homes are delivered on a brownfield site than an equivalent area of greenfield land. Government land use change statistics show that, in every year since 2004, we have consistently built on average 50% more houses on brownfield sites than on equivalent areas of greenfield¹⁶. We should use this land before even considering going into the Green Belt.

Green Belt's primary purpose is to prevent urban sprawl, but in doing so it provides countryside close to 30 million people. A huge proportion of it has considerable environmental value. In the face of climate change, it has an increasingly important role in storing carbon and preventing flooding and is a vital economic resource for food security and soil protection.

In fact, the NEA recognises the huge value to society of agricultural land, both in terms of food production and in 'cultural services' (such as the sense of wellbeing produced by seeing an agricultural landscape). The NEA also notes that biodiversity and some landscape features (particularly hedgerows) have declined in many agricultural landscapes but emphasises that this trend has begun to reverse through better land management.¹⁹ Away from benefits of the agricultural land, Green Belts provide countryside close to 30 million people, giving us 29,000 km of public rights of way, 68,000 ha of Sites of Special Scientific Interest (SSSIs) and just under 140,000 ha of deciduous woodland. In particular, England's Green Belts contain 34% of our Local Nature Reserves and 17% of our ancient woodland, a relatively higher proportion than countryside without the Green Belt designation. Forty-eight new Local Nature Reserves have been created in the Green Belt since 2009, 30% of the total of all new LNRs created in England²⁰. In the face of climate change, the Green Belt is also likely to have an increasingly significant role in storing carbon and preventing flooding.

Green Belt policy is designed to prevent sprawl and all the negative costs associated with it. A recent research report from the London School of Economics found that urban sprawl in the USA imposes costs to society as a whole of more than \$1 trillion. This report shows that the costs of sprawl fall into two significant categories:

- The loss of undeveloped land and all the services that this provides, particularly in relation to food production and reduced ecological services.
- More dispersed activity, including reduced accessibility, higher costs of public infrastructure and longer trip distances

Releasing just a small percentage of Green Belt sounds an attractive way of releasing land for housing. But once bits of the Green Belt are removed, the integrity is reduced and so its benefits begin to be lost. Permanence is also an important feature of Green Belt so people, businesses and the Government (through supporting environmentally sensitive farming on Green Belt land) have had the confidence to invest in the area on that basis. Conversely, the temptation is removed for people to buy Green Belt land in the hope that it will be de-designated and its notional value for development will increase.

There are strong reasons to believe that large scale development might actually encourage more car-based commuting in particular. Analysis of 2011 Census data by the Royal Town Planning Institute (RTPI) found that in five towns in Berkshire and Hertfordshire surrounded by the Metropolitan Green Belt, 72% of commuters travelled by private vehicle and only 7.4% commuted to London by train. For each new house built in the Green Belt, the report estimated, between four and seven additional car trips per week could be generated.²⁸ Instead, we need to do more to create jobs near where people live rather than far away from housing they can afford.

Do you agree with the new Local Plan Objectives?

Why does Warrington need to become a new city? No evidence has been provided as to why this is necessary.

There are no proposed employment opportunities in Lymm – any additional housing will be purely for commuting to other locations. This has impact on local air quality – this is a major factor in vulnerable people’s morbidity rates for respiratory illnesses. This contradicts the objective to improve air quality.

Commuter journeys will be increased as there are no proposals to improve infrastructure or increase provision of public transport. This contradicts the sustainable transport objectives.

There are no infrastructure plans for Lymm, therefore new development is not required to deliver the infrastructure objective.

The proposed development in Lymm will not be compatible with the health and wellbeing objective. Air pollution will be increased as there is little access to public transport; removal of greenbelt will impact on resident’s access to green space – proven to aid personal wellbeing.

This proposed release of Greenbelt in this LP does not safeguard the remaining Greenbelt after the 20 year plan.

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

The Spatial Options propose a minimum of 500 houses for Lymm, approximately 1500 new residents, disproportionate with the current size of the village. There has already been

significant brownfield development in the village, with no infrastructure expansion apart from minor extensions to existing primary schools. In your report, you note that all schools in Lymm are at capacity with no options to expand existing sites apart from one school with limited options to expand. Your report also notes that doctor's surgeries in Lymm are all at full capacity, with no option to expand. There are also no proposed improvements for infrastructure.

[REDACTED] If the UK as a whole released greenbelt at the rate proposed by the Warrington LP for housing development, and with the unknown trade tariffs under Brexit, how do we plan to feed our nation?

We also have significant concern about the local flora and fauna. The field has a protected tree. There are bats – a European Protected Species so their habitat must be preserved. Cheshire East Council recently lost a court case over planning practices that did not protect bat habitats. The hedgerow sustains a large population of Tree Sparrows that currently hold 'Red Status'. Red is the highest conservation priority, with species needing urgent action. With this biodiversity, there are several birds of prey, including but not limited to Peregrine Falcons and Buzzards and Tawny Owl which has Amber status. Our concern is that if the field loses its Greenbelt status, and is developed, this environmentally sensitive ecosystem will be illegally destroyed. Once it is gone, it cannot be recovered.

Because the proposed developments are on low-lying land, the visual intrusion will be significant. Such significant development will also impact of the village character of Lymm.

By building on Greenbelt, you will significantly increase surface water runoff. The floodplain from the Manchester Ship canal and River Bollin is close to the outlying areas of Lymm. By removing natural drainage facility of Greenbelt and increasing hardstanding through rooftops, driveways, patios access roads and pavements, this is increasing the flood risk of Lymm. Current use of soakaways in new developments in areas underlain by halite (salt) beds, which are present on the Oughtrington area of Lymm, can increase the risk of sudden voiding and ground collapse. There is already a major sinkhole here - the pond at Heatly Mere estate – who would take responsibility for a new sink hole developing due to the local geology? This has not been considered by any of the WBC reports, and poses a significant risk with the number of house proposed. This could cause death and/or major injury, and at the very least loss of property.