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Appleton Parish Council Response

Warrington Borough Council Local Plan

Preferred Development Option, Regulation 18 Consultation, July 2017

I summarise, in this covering letter, the main points that Appleton Parish Council wish to make in response to the consultation document on the Warrington Borough Council Preferred Development Option (PDO) covering the next 20 years.

This letter reflect the views of both Parish Councillors and the many residents who have made contact with us.

The Parish Council is opposed to any development on green belt land.

The Parish Council challenges the need to build 24,220 houses over the next 20 years. Using the normally accepted multiplier of 2.3 people per household, this equates to a population growth of 55,706 over that period. Using the Office of National Statistics and other sources, the forecast population growth for Warrington by 2037 is only 25,400. This, including the 5% increase used in the report and adding in the current backlog, equates to only 12,442 houses. The significant population increase used in the report is not adequately explained or justified.

The urban capacity (brown field sites) of 15,429 homes, quoted in the consultation document, would easily be able to cover the number required over the next 20 years based on the forecast population growth. Even more if the Fiddlers Ferry and Warrington Hospital sites become available.

We understand that Central Government has now issued, for consultation, guidelines for establishing housing need. This indicates that a minimum of 914 houses per year would be required to be built in Warrington. The Parish Council has not yet had the opportunity to interrogate and understand this number.

Should, however, the new Warrington Local Plan cover the more normal 15 years and use the Government minimum number (assuming guidelines are confirmed), the housing number in the Plan could not be challenged, as was the previous one, and all the new houses could be built on brown field sites for the duration of the Plan. With a 15 year Plan, the housing number could even be increased to 1028 per year without touching green belt land. This approach would also be more likely to address lack of affordability, which is also one of the Governments objectives.

The Parish Council considers that no green belt land need be used and that a more normal 15-year Local Plan be produced.

The Parish Council is aware that, even before the consultation document was produced, there are proposals to build more than 1,000 houses on land in Appleton and nearby Grappenhall and Stretton.

When the Warrington Development Corporation was in place and developing the expansion of the Town in the 1970/80's, a significant new road structure was planned, including a North/South expressway and the Howshoots link, which would have been in place before house building. The Corporation expected the Town to grow to a population of 200,000. The Corporation was disbanded prematurely before much of this was constructed. The opportunity to properly connect the North and South of the Ship Canal was lost, probably for ever. Warrington has, however, continued to grow and now has a population of over 207,000. Hence the almost daily grid lock we all experience.

The Parish Council is opposed to any significant new development before the necessary road network, to cope with both existing and new traffic volumes, is in place and the environmental impact of proposed development assessed and addressed.

The Parish Council understands that this may not now be possible without destruction of existing residential areas, both in the North and the South, and valued assets, such as part of the Trans Pennine trail, lost.

Should this be the case, development should not be permitted.

The Parish Council understands the need to have a local plan and that elements of the previous plan were challenged. It is considered the PDO is an overreaction and will not address the needs of the Town. The new plan should accommodate normal population growth, concentrating on affordable homes and social housing, should discourage disproportionate car growth and deal with existing and future traffic problems and pollution.

The Parish Council would like to summarise its view that a 15 year Local Plan is produced, all the development the Town needs can be accommodated on brown field sites and all existing green belt land should be protected. No development should be commenced until the infrastructure need to support it is in place.

Appleton Thorn Neighbourhood Plan

As you are well aware Appleton Thorn has a Neighbourhood Plan which has been approved by Warrington Borough Council. The Parish Council are concerned that there is very little reference to this adopted Neighbourhood Plan which contains land has now been identified for houses by the Local Plan. The Appleton Thorn Neighbourhood Plan in addition to protecting greenbelt land has protected views which does not seem to be taken into considered in the proposed draft Local Plan.

Protected Green Belt

The Parish Council are opposed to the plans to build any houses on protected green belt fields. The green belt fields are protected open spaces and these should be retained for future generations. Whilst the Parish Council recognized that Warrington Borough Council needs to produce a local plan and make a provision for housing the wholesale destruction of green belt fields in South of Warrington is unacceptable.

What are the 'exceptional circumstances' which mean that green belt land has to be built on? There is no justification on for this contained in this draft Local Plan. There is no environmental impact survey that has been undertaken that has looked at the loss of a significant amount of green belt land. There has been no ecological survey undertaken as part of this draft Local Plan. There is insufficient detail to justify the reclassification of this protected green belt land. The loss of landscape and amenity value land is unacceptable in the South of Warrington.

In the Adopted Local Plan Core Strategy Plan dated July 2014, it states (p138), **"The wider countryside around the town and other settlements in the borough is designated as Green Belt. As such it is protected from inappropriate development which is defined by national policy."** **Additional pressures on the countryside need to be carefully managed if its character, appearance and many functions it preforms are to be protected and enhanced."**

Whilst the Parish Council understands that certain elements of this adopted Local Plan Core Strategy were quashed by the High Court, this adopted policy by Warrington Borough Council was not one of them that was overturned. Given the adopted policy for Warrington Borough Council (less than three years ago), the Parish Council are horrified that the new draft Local Plan proposes housing on this protected green belt and the proposal to remove every village identity with a garden city suburb.

The Parish Council are concerned regarding huge impact of the Local Plan will have on the South of Warrington. 93% of the housing proposed for green belt is south of the Manchester Ship canal. Why is such a huge proportion of green belt land being loss in the South of Warrington? Would it not be fair to distribute any green belt loss evenly across the whole of the borough?

No Environmental Impact Survey

There is no environmental impact survey in the consultation regarding the impact of currently green belt fields. In the Local Development Scheme booklet issued in October 2016 Warrington Borough Council states (p11) point 3.34;

“As part of the process, the Council will:

- **Prepare an environmental report on the significant effects of the draft plan document**
- **Carry out consultation on the draft plan and accompanying environmental report.”**

There is no accompanying environmental report in the current draft plan.

Funding of proposed Infrastructure

Whilst the Local Plan does acknowledge that the infrastructure requires considerable improvement including new road networks, new schools and new medical facilities in the South of Warrington there are no details of how this will be funded. Section 106 agreements are piecemeal individual agreements with developers which are paid once developments have been completed. The infrastructure needs to be in place before any phased housing developments commence in the South of Warrington. The Parish Council would like the details of how all the proposed infrastructure will be funded and by whom. The Parish Council noted that infrastructure improvements were planned by the New Town Development Corporation however this have never been done.

There are no train stations in the South of Warrington to serve the existing communities, the plan for more houses must include the provision of adequate public transport links including new rail links.

M6 / M56 have traffic issues resulting flooding Warrington with vehicles and grinding everything to a complete lockdown. New road infrastructure is required if new houses are to be built.

Redevelopment of existing Brownfield sites throughout Warrington

The draft local plan seems to have taken no consideration in the redevelopment of brownfield sites that are currently available or will be become available for redevelopment. For example, Fiddlers Ferry or the current Warrington hospital site. These must be fully considered before making any decision to release green belt fields for housing. Housing densities in the Local Plan are the same regardless if the land is brownfield or greenbelt. Higher density ratios should be used for housing in the town center and this would reduce the demand for land elsewhere.

Housing figures

The Parish Council are concerned regarding the prediction in housing numbers and the large rate of growth that is anticipated. This subsequently increases the predicted housing need in Warrington. The current population of Warrington is 207,700 and the proposed housing units in the Local Plan is 24,220 which means an additional growth of 27%. The projected increase from the Mid Mersey Strategic market housing assessment update final report dated May 2017 is 12%. Even if a 5% contingency this is less than half of the Local Plan proposal of 24,220 as such no green belt needs to be lost anywhere. The UK Office for National Statistics also expects the UK population to increase by only 12% in the next twenty years.

No comprehensive traffic and detailed Highway Assessment report

No comprehensive highway network is proposed and there are no traffic surveys that have been submitted as part of this consultation on the draft Local Plan. The Howshoots link and Wrights Green Distributor Road have been promised for some considerable time however both these have not yet been undertaken. An additional 9,000 houses in the South of Warrington will result in an additional 20,000 cars. There is no full and comprehensive traffic survey and detailed Highway assessment report which has been supported as part of this draft Local Plan.

Garden City suburb concept

The local Plan details the creation of one big Southern suburb rather than the distinct separate individual villages. The draft local plan states, **“The initial development concept envisages this area will be focused around three green neighbourhoods centered around a new district centre.”**

Appleton, Stockton Heath, Walton, Stretton and Hatton are separate individual villages all distinct in nature and character. No Parish Council in South Warrington wants to be merged into a three neighbourhoods to be one big ‘garden city suburb.’ The National Planning Framework recognizes and has encouraged neighbourhood plans in order to protect individual villages identity and to promote sustainable housing reflecting community needs. However, the proposed Local Plan just wants to merge all the villages, remove any village identity and replace as one garden city suburb. The whole purpose of having protected green belt is to check the unrestricted sprawl of large built up areas, to prevent neighbouring towns from merging into one another, to assist in safeguarding the countryside from encroachment and to preserve the setting and special character of historic towns. Warrington Borough Council designed this land as green belt to remove this protection Warrington Borough Council will have to demonstrate ‘exceptional circumstances’. There are no ‘exceptional circumstances’ detailed in the proposed Local Plan.

Other options?

The Parish Council has noted that this is the preferred option of Warrington Borough Council, what were the other options? Members of the public and local Parish Councils have not been given the opportunity to discuss nor have been consulted on any other option. The draft local plan is unacceptable in its current form and lacks any supporting surveys particularly on the environmental and highways impact.

Local Listed Heritage request

The Parish Council sent a letter dated 25th November 2016, I enclose a copy for your reference regarding the Local Plan review at this time and requested that certain local heritage items be included in the locally listed section of the Local Plan. There is no reference to the Local Listed heritage items in the current draft consultation and I would be grateful if you could consider this for the next stage of the Local Plan.

In addition, could the following also be added to the Local list;

Existing sandstone walls on Lumb Brook Road.

All Cheshire railings.

All sandstone walls on London Road.

The Thorn Inn on Grappenhall Road in Appleton Thorn.

Sandstone walls on the public footpaths adjacent to Shepperton/Pangbourne Close.

'The Rock' which is the cut through on Firs Lane.

The Parish Council would like to take this opportunity to thank you for the many briefing sessions that have been made available and ask you to take the views in this letter into account when developing the new draft local plan.

If you wish to discuss any aspect of this, please contact me.

Many thanks

Yours sincerely



Enclosed letter dated 25th November 2016

