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28<sup>th</sup> September 2017.

Dear Planning Policy team,

**Warrington Local Plan Preferred Development Option.**

Please find attached my comments on the Preferred Development Option for the Warrington Local Plan.

I have set out my overarching comments in this letter and have also provided more detailed comments in the standard response form. The letter and comments should be considered together, as my formal response to the Local Plan PDO review.

In submitting these comments I acknowledge that not all growth and development is bad and that new homes and employment opportunities are needed if Warrington is to remain a vibrant town. I also support the need for a Local Plan to provide the strategic framework against which development proposals can be assessed. But as written the current Preferred Development Option (PDO) does not provide a coherent, integrated vision for Warrington and it is not clear if the suggested growth levels are sustainable, or whether they will bring about a net gain of benefits to the residents and the environment of the Borough.

Unlike the previous Local Plan core strategy, which set out a more balanced vision for the area as a whole, the PDO appears to be driven and underpinned by the ambition for Warrington to be a city. This aspiration is being promoted to support the ambitions of developers and business, as set out in the Cheshire and Warrington Strategic Economic plan, Peel Holdings Atlantic Gateway proposals and then reflected in the Council's Warrington Means Business report. Whilst these plans are not without merit, the detail of how they will be achieved is important and the current PDO does not provide the evidence or reassurance that the benefits to residents, as suggested in these glossy but outline strategies will be realised. This driver has resulted in a series of options in the PDO that are designed to bring about improvements to the town/ city centre, but seemingly at the expense of other areas of the borough.

The housing targets are inflated beyond those required by Government, creating pressure to build on green belt, something which the current Secretary of State for the Department for Communities and Local government, Sajid Javid, as well as leaders from other political parties have recently reiterated should be avoided, in line with the National Planning Policy

Framework. Employment aspirations are too focussed on the distribution industry, which creates few jobs and will increase the pressure on an already overloaded road and rail network, as well require yet further development on green belt. Proposals for new link roads to ease congestion will blight the lives of those who live near them, create more pollution, potentially attract more traffic into the town as people avoids tolls on other major bridges and will do little to reduce Warrington's dependency on the car.

None of the above are compatible with the other stated objectives to "reinforce the character and local distinctiveness" of Warrington, and to minimise the impact on the environment.

As a resident of south Warrington I have considered the impact of the PDO on this area in particular. The character and quality of the built and undeveloped environment in south Warrington contributes to making it a place in which people want to live and work. The proposals in the PDO will potentially detract from this and may result in Warrington as a whole becoming a less, not more attractive place in which to reside and invest.

I wish to see a local plan that provides a coherent, sustainable plan for the whole of the borough and which will result in a net gain for people and the environment. The Local Plan should be developed with meaningful input from communities, as well as developers and business, if it is to be a truly shared plan that we can all be proud of and support.

I am happy to discuss my comments with you further if that would be helpful.

Yours faithfully,

[Redacted signature]

[Redacted address line 1]

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**WARRINGTON**  
Borough Council

# **Warrington Borough Council**

## **Local Plan**

### ***Preferred Development Option***

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

## 2: Questions

### Question 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?**

#### **Response:**

The housing targets have been inflated beyond those required by Government to fulfil the ambitions for growth aspired to by business and developers. Whilst the strategies set out through the Northern Powerhouse, the Cheshire and Warrington LEP Economic strategy, the Atlantic gateway vision and the Council's own Warrington Means Business report are not without merit, there is no easily accessible analysis or evidence that this level of growth is sustainable or will truly bring benefits for Warrington present and future residents.

New standardised housing targets will be required. The Government's Housing White paper consultation currently underway is likely to result in new standard methodology being adopted for housing targets, to be introduced March 2018. Within the transition process identified in this, Warrington BC will have to revise the targets against this new methodology. This is required before a proper assessment can be made of the land required.

The original Local Plan core strategy 2014 and subsequent documents identified the need for start- up and affordable houses. Why then are the Council now proposing to encourage low density houses on green belt? This will detract from the character and quality of the landscapes in South Warrington, as well as increase inward migration of people, who will probably work elsewhere, putting pressure on roads and already congested rail networks.

Employment.

There appears to be a mis- match between the planned housing, housing need and the type of employment that any new development will provide. The Council's own consultants Mickledore identified the need for housing projections to be linked to employment forecasts and type of employment to be created. The main growth area appears to be for distribution, which is seemingly desired by developers. But as stated in the PDO, distribution creates few jobs. The Northern Powerhouse report set out more ambitious aims for building the technological skills base of our workforce, which over time would enable us to build the NW economy in areas that will be in demand. Let's not cover our green belt in warehouses, which will add to the congestion on the road network, but provide little benefit by the way of jobs for existing residents.

## **Question 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?**

### **Response:**

The PDO doesn't account for land that would be freed up by the closure of Fiddlers Ferry Power station, which will release brown field land for development. All other options should be fully explored before developing on green belt.

Much of the employment requirements appear to be predicated on the desire to develop further distribution sites. There is a question as to whether this is sustainable, given the land requirement and the additional pressure it would create on already congested roads.

### Question 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'?

#### Response:

No. The National Planning policy framework makes much of the need to have the right development in the right place.

The PDO has not made a sufficient case as to why there are 'exceptional circumstances' to justify development in green belt. Both political parties have recently reiterated the need to protect green belt and the proposals in the PDO go against statements made in other Warrington BC strategies that make much of protecting green belt and the green infrastructure this town is fortunate to have. As mentioned above until we have a revised housing target it is not possible to properly work out the land required.

I don't agree with the moderate green belt assessment given to the land between Grappenhall and Appleton, or that between Walton and Moore. The primary purpose of green belt is to prevent urban sprawl and maintain a separation between urban areas, which both these areas are doing.

Much of this land, especially in the proposed SE urban extension has a semi-rural character, contains attractive and coherent settlements and green space and provides an attractive setting for the rest of Warrington. The transport infrastructure and new housing being suggested will detract and reduce this considerably.

On a point of detail the outline plan for the SW urban extension indicates residential development on a piece of land to the SE of the A56 at Lower Walton, next to the recently developed Springfield garden centre site. In the green belt general assessment this area is assessed as playing a **strong** role, but when broken into smaller parcels it is down-graded to moderate. Inevitably if you isolate individual parcels it will reduce the impact of the whole parcel of green belt. This also suggests that the methodology employed by the consultants is potentially flawed. This proposal represents opportunistic development on land that is performing a strong green belt function, when considered as part of the whole parcel. This area will also be at the southern end of the western link road, should that happen, so there will be high levels of pollution and noise, hardly conducive to good quality residential development.

## Question 4

Do you agree with the new Local Plan Objectives?

### Response:

No. The new objectives which I am assuming will replace those in the Local Plan core strategy 2014, are all designed to deliver the aspiration for Warrington to become a city and to support growth.

The vision and objectives in the core strategy 2014 provided a more balanced set of objectives that would deliver wider benefits for the whole of the borough and its residents and seemed more likely to be sustainable over time. They supported growth but not at any cost, and appeared to balance the requirement of business and developers with those of the communities that make up Warrington, whilst also protecting Green belt.

I am not aware of much support for City status or the levels of growth now being proposed.

Objectives W1 to W4 will not fully deliver W5 or W6. As written none of them will support sustainable growth that will bring net gains for the environment and for people.

## Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

### Response:

NPPF, the core strategy as originally consulted on and continuing Government policy makes much of the need to protect Green Belt and to ensure that the right development is put in the right place.

This would suggest no options should be considering development on green belt until all other avenues have been thoroughly exhausted. As mentioned previously a proper assessment of housing need through a standard methodology is required, as is fuller consideration of the potential of the Fiddlers Ferry site once it closes.

It is not clear from the information available why option 5, which would spread some of the required housing and employment development to several places is not part of the overall solution.



## Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

### Response:

See points above about the type of employment to be encouraged and the desirability of even more distribution industry activity in Warrington.

Given the impact that the Port Warrington expansion proposals will have on Moore village, Moore Nature reserve and the subsequent loss of amenity for the borough as well as a potential loss of biodiversity, there is a need to thoroughly test whether the expansion of the Port will bring benefits to Warrington and its residents and won't simply add more pressure to the area.

Whilst on the face of it using the Ship canal to move goods between Manchester and Liverpool seems sensible as it should take heavy freight off roads, it is not clear whether this adequately mitigates for the impact that will be created by the need for new crossings over the Ship Canal, to avoid more congestion for Warrington. The infrastructure required to support this proposal is not wholly positive in impact and a better assessment is needed of the overall impact of the plans, rather than the individual elements of it, on the environment, including road traffic, noise and air pollution.

## **Question 7**

**Do you agree with our Preferred Development Option for meeting Warrington's future development needs?**

### **Response:**

No. As stated above the PDO is predicated on ambitious growth forecasts that may not be sustainable or bring benefits to Warrington residents.

There needs to be a proper debate about the level of growth that Warrington residents want to see.

## Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

### Response:

The proposals contain some laudable ambitions, but there needs to be some realism about the role that Warrington can play when set against the major centres of Liverpool and Manchester.

Recent planning decisions have been inconsistent with the stated desire to bolster the town centre, to improve its vibrancy and enhance competitiveness. For example out of town retail units have been encouraged on Winwick Quay, using up land that could have been used for housing, and reinforcing dependency on the car. The loss of anchor stores such as Marks and Spencer indicates that retailers are not confident about the long term competitiveness of the town centre retail area.

In my opinion the quality of the development achieved in recent years and the Councils track record in securing and then enforcing additional benefits from development in the form of planning gain is poor. For example it has taken nearly two years for the riverside road on Howley Lane to be surfaced following the development of new residential areas. The standard of the works and associated landscaping is poor and if this is the quality of development that is considered acceptable we are not going to see the transformative impact suggested by the glossy pictures seen in reports such as Warrington Means Business.

## **Question 9**

**Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?**

### **Response:**

No particular comment other than a proper assessment is needed of the impact of future development on these urban satellite centres.

## **Question 10**

**Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?**

### **Response:**

See comments above about quality of development. It is important that any new development is in keeping with the character of the built up area and makes a positive impact.

Space should be made for greenspace, cycle routes and other green infrastructure that is accessible and able to be widely used by all.

## **Question 11**

**Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?**

### **Response:**

See previous comments about the objectives for the Local Plan, release of greenbelt, the need for an integrated vision, and proper assessment of housing need, not entirely driven by the growth ambitions of business.

The label infers that this will be a suburb of a garden city, but the overall vision for Warrington is not for a garden city and this feels like 'green wash' to make the proposals seem more acceptable.

Whilst there are some positive developments taking place elsewhere to create new garden cities such as Ebbsfleet, these are mostly on brown field sites.

In reality this option will erode green belt, impact on the semi rural character of some of the land between Grappenhall and its environs and create extra pressure on schools, roads and other facilities.

The new Eastern link road proposed between Lymm and Thelwall will be visually intrusive, impact on the residents along its length and will necessitate the diversion/ loss of parts of the Transpennine Trail, which is a valuable recreation resource of regional and possibly national significance.

## Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

### Response:

See previous comments about the objectives for the Local Plan, release of greenbelt, the need for an integrated vision, and proper assessment of housing need, not entirely driven by the growth ambitions of business.

This area is functioning as green belt and acts to separate Warrington and Halton. Undoubtedly the quality of the landscape in this area could be improved, but to develop this area as suggested in the PDO will have a severe impact on the semi-rural character of the Walton conservation area and Moore Village. An increase in houses and associated development will create more pressure on the road and rail network and the nearby centre of Stockton Heath.

The proposed Western link will create a visual intrusion into the landscape as well as create an increase in traffic noise and pollution. It is not clear whether the suggested reduction in congestion of about 30 % ( as advised by [REDACTED] ), will actually be realised, given that traffic may divert away from the Silver Jubilee and Mersey Gateway bridges to avoid tolls.

### **Question 13**

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

**Response:**

**Not considered in detail.**



## Question 14

Do you agree with our approach to providing new employment land?

### Response:

No. The main growth area appears to be for the distribution industry, as desired by developers. But as stated in the PDO distribution creates few jobs. The Northern Powerhouse report set out more ambitious aims for building on the technological skills base of our workforce, which over time would bolster the ability to develop the NW economy in areas that will be in demand. There is a need for a more rounded assessment of the sort of employment we would like to encourage, especially before releasing green belt land.

So no I don't agree with the approach as it is based on flawed assumptions about what sort of employment is sustainable and desirable in the longer term.

## Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

### Response:

No particular comment.

## **Question 16**

**Do you agree with our suggested approach for dealing with Minerals and Waste?**

### **Response:**

No particular comment, although these will require an assessment of the environmental impact.

## Question 17

**Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?**

### **Response:**

The vision that was set out in the local plan core strategy 2014 has been lost.

The local plan should provide a coherent, integrated, sustainable plan for the development of Warrington, which will result in a net gain for the people and places in Warrington.

This should include a comprehensive integrated transport plan, which aims to reduce the reliance on cars. The plan should show how local character, quality of life and wellbeing will be improved.

The PDO as currently written will not deliver such aspirations. Some growth and development will be necessary, but this should be developed in proper and meaningful consultation with local communities, not imposed upon us, to the benefit of developers.

We need robust assurances that any development will truly deliver a net gain for Warrington, and that those who stand to gain financially from any development are also making substantive contribution to the development and management of quality houses and enhanced and well managed environmental infrastructure.

Warrington is fortunate in having a good network of open green space and green infrastructure but the Council is already struggling to maintain the existing parks and gardens, so while I wholeheartedly support the need for new development to include new GI and greenspaces, proper thought needs to be given as to how these will be maintained going forward.