

[REDACTED]
Warrington
[REDACTED]

13th June 2019

Sent via Email and Post

Warrington Borough Council
Local Plan, Planning Policy and Programmes
New Town House
Buttermarket Street
Warrington
WA1 2NH

Dear Sir or Madam,

Re: Warrington Local Plan 2019 OBJECTION

I am writing to you to **OBJECT** to the Warrington Local Plan 2019 which is currently ongoing the consultation phase. I was one of the approximately 4,500 people in Warrington that objected to the Proposed Development Plan (PDO) prepared and consulted on in 2017. Like the other, objectors my thoughts, concerns and objections were not addressed with this Local Plan, hardly differing to the DLP. I believe the release of green belt in South Warrington is being treated as fait-acompli with no effective consultation or engagement, proved by the minimal changes from the PDO 2017 to the 2019 Local Plan.

The production of the Draft Local Transport Plan 4, has been put together in an attempt to support the Local Plan. However, the DLTP4 is vague, not realist or deliverable but is being used to push concerns of the Local Plan around transport infrastructure onto the DLTP4. Given the issues around transport in Warrington the two documents are inextricably linked, but neither provide deliverable solution showing how they are going to solve the current traffic situation never mind with more houses and sheds in South Warrington. I will be commenting on the DLTP4 separately but I feel that the process is to create confusion. Therefore, I will be referring to and criticizing the DLTP4 in this objection, but this is directly linked to my criticism of the Local Plan.

The majority of the proposed development is based around new house building. While I understand the need to build homes, I believe Warrington has built its fair share over the years which has overloaded the transport system. I believe the way the numbers of houses being proposed is unjustified and the method used to determine the number is unsound. The Government has set 'targets' for houses as outlined in the letter from the RT Hon James Brokenshire in his letter dated 8th April to Cllr Andy Carter. The Government also allow councils to reduce the numbers were cities or towns are constrained and talking to local councils to see if there are more joined up solutions. In the consultation event I was told by one of the officers that Warrington was not a constrained town. Bounded by three major motorways, two close towns (Runcorn and Widnes) with their own constraints and two water courses (the River Mersey and Manchester Ship canal). I am not sure of many other

towns that have as many obstacles as this which clearly have an impact now never mind with further growth. It would appear that WBC has not had serious consultation with our neighbouring councils Halton/ St Helens to review their figure and available land to restrict the amount of green belt being released. The housing plan would also appear to be based on employment growth not on a locally arising need, this needs to be reviewed. The housing numbers do not factor in people leaving the area due to poor low value jobs, new sheds, poor public transport, terrible road infrastructure etc. These considerations, discussions and constraints should be taken into account and new housing figures produced and agreed with the Government before we proceed any further with this unsound prediction.

The distribution of housing is focused on the south of Warrington, where it would be better to put few houses in more places. The allocation of this housing is unsound and has not considered other areas in the town, which have better access to public transport and not have to cross the ship canal. The release of 600 acres of green belt is not justified and should be subject to a Very Special Circumstance as outlined in the NPPF. The Green Belt performs the following functions all of which this plan seeks to ignore:

- to check the unrestricted sprawl of large built-up areas, this plan will increase the sprawl of Warrington built up areas.
- to prevent neighbouring towns from merging into one another, this plan will join Appleton, Grappenhall and Stretton to Appleton Thorn
- to assist in safeguarding the countryside from encroachment, this plan seeks to destroy the countryside.
- to preserve the setting and special character of historic towns, this plan will affect the character of Appleton Thorn, Grappenhall, Daresbury, Stretton, Walton...
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, the plan opens the door for easy development rather than concentrating on the brown field sites first.

The Arup Green Belt Assessment (GBA) 2016 draws on the Landscape Character Assessment (LCA) 2007 but the 2 documents are at odds. Arup suggest that Green Belt in the adjoining Stretton and Hatton are strong and weak whereas the LCA notes no differences. These differences call into question the GBA and its recommendations/ conclusions.

I believe the assessment of sites is unsound. The use of brown field sites has not been explored or enabled by WBC who could have invested in these sites to enable them for development and ensuring the affordable housing was delivered in the right location. Instead of forcing houses into the wrong areas, which then need expensive infrastructure upgrades. The Plan has not rigorously reviewed the location of 'inappropriate' or redundant development in the town and seek to resolve this. The old Lever Brothers site at the back of Warrington Bank Quay station could be relocated to a more appropriate location (Fiddlers Ferry Power Station site) releasing a huge amount of land for redevelopment. The recent news that Fiddlers Ferry Power station will close in 2020 makes this option along with relocation of the proposed employment areas. The power station site would be eligible for grants to repurpose the land which already has rail links. The review of retail areas within the town, with the demise of retail industry parks such as Riverside this could be redeveloped on the side of the river. This development would enhance and improve the use

of the town centre instead of building houses in a location where it is easier to get to Manchester or Chester. The assessment of green field sites has not been properly investigated in terms of ecology/ noise/ air quality/ traffic etc.

The council have set target of 20% affordable in inner Warrington and 30% elsewhere. Recent approved housing schemes in Warrington town centre near transport infrastructure have included zero affordable housing due to economic statements from the developers. As I said above the council could invest in these sites to enable the delivery of affordable housing instead of investing in Birchwood Park or Redwood Bank.

The majority of the employment land outlined in the Local Plan is again located in South Warrington on Green Belt Land. It would appear this land has just been chosen for the location on the M6/M56 interchange and financial reasons. The location of the employment does not support the aspirations of the LDTP4 which is looking to encourage the use of intermodal transport. The employment area proposed in South Warrington is totally reliant on cars and HGV's will never be able to be connect to the rail network. As has been proven by the recent applications, these locations do not provide a Very Special Circumstance except the provision of low paid factory jobs in empty automated 'super-sheds'. The assessment of employment need in the town is not justified and the majority of the employment area will be built speculatively. A VSC would need to prove there is a need that can't be satisfied on another site. The Plan like the application do not provide sufficient research on alternate sites around the town or if it would be better in an adjacent town. The Plan should also take account of what is happening in Greater Manchester and Merseyside like Airport City 15 minutes away from the proposed employment area. The impact of this employment area will be catastrophic on the highways infrastructure, the ecology, air quality, noise etc. We already know the highway junction can't cope. I was told that at the Consultation event that the Cat Lion junction is now over capacity and will not take any more development. Yet this employment area included in the Local Plan will push more residential traffic to this junction as J20 of the M6 will become unusable. This is while the Cat and Lion junction becomes loaded up traffic from the recent approvals on Homes England Land.

The Local Plan does not adequately address the problems of infrastructure suggesting the highways issues to be addressed in the DLTP4, which is very much at a concept/ ideas and feasibility stage. Even now homes are being approved on the Homes England land in South Warrington but without critical pieces of infrastructure included in the Warrington New Town Plan. The site approved in particular Dipping Brook would appear to make the proposed link road to the Broad Lane roundabout impossible to achieve. No new schools, no health facilities (it took 15 years to get the GP surgery in Chapelford), no local centres, no road upgrades relying on poorly maintained Victorian swing bridges and a restricted weight high level crossing. I was told at the DLTP4 Consultation that no new homes will be built until the infrastructure is created, but how is this going to be funded and why not spend this money on enabling town centre sites as I outlined above? Infrastructure is either funded via Private Development, Local Authorities or Government. The plan needs to outline how it is going to facilitate this otherwise the proposals are not deliverable making the plan unsound.

I understand and it was confirmed at the DLTP4 consultation event that Highways England have expressed 'concerns' about the scale of development being proposed in the Local Plan. The officer also confirmed they are still to provide formal feedback on the DLTP4 or the Local Plan, which seems unbelievable that WBC would continue to press on without this feedback. The local motorway infrastructure is some of the busiest motorways in Britain and if you lived in Warrington you would realise how fragile they are now. Given the proximity of the junctions and bridges it is hard to see how the M6 can be improved and constant delays at rush hour will continue. This will detract business and people wanting to set up or settle in Warrington again putting into question why these constraints do not affect the project growth or housing figures.

The impact on the environment will cause irreversible damage and in light of recent government pledge to become carbon neutral by 2050 this proposal does not reflect these commitments. The Woodland Trust have released statistics to show the scale of the challenge in meeting the net zero emissions will require a three-fold increase in current woodland creation levels. Warrington's air quality is one of the worst in the country not helped by the standing traffic and motorways on three sides. The DLTP4 suggests we will all be driving electric cars and putting charging points in new houses this is something they can't guarantee. What we can guarantee is that once the green belt land has gone we will never get it back. The loss of ecological habitats will be huge. We know from the submitted Six56 application this application alone will remove over 4,000m of hedge row, over 50 mature trees, 6 ponds one with GCN's and 80 ha of land supporting various wildlife. It is clear that this plan has not properly assessed the environmental impact of the proposals, the loss of green belt and potential increase in roads to service the plan.

A Local Plan is required is to control where future development is built. However, this Plan is unsound as the growth options and housing numbers need an independent review to give the plans certainty, which this has none. Once this has been reviewed and agreed the plan then needs to look to minimise the destroying of greenbelt for houses and sheds. The 20 year plan period is too long and should be for 10 or a maximum of 15 years this will allow the predictions to be assessed and altered accordingly. Is 4,500 comments to the PDO, 1000 objects to one of the employment sites and unrest being vented on Social Media not enough for the council to realise the plan does not reflect the views of the people of Warrington. This plan should be withdrawn and not submitted as it is poorly considered and **UN SOUND**.

Your sincerely

A solid black rectangular box used to redact the signature of the sender.

Andrew Cross