

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Subject:** Objections to PSV Local Plan  
**Date:** 15 June 2019 14:12:22

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## **Re: Objections to PSV Local Plan**

I am writing to object to the PSV Local Plan. I believe that the Local Plan is flawed and there are significant weaknesses in the arguments presented for the scale of economic growth and development of green belt.

In my opinion the Local Plan is unjustified, undeliverable and unsound for the following reasons:

### **Period of the Plan**

The Local Plan covers a 20-year period, whereas the Government only requires it to cover a 15-year period. This has a significant impact on increasing the number of houses that are required to be built over the period of the plan, and so increases the level of green belt identified for release.

In my opinion, by reducing to plan to 15 years would reduce the level of housing required and so reduce the level of green belt destroyed. For this reason, I believe that the plan is unjustified and unsound.

### **Economic Growth**

I believe that the level of economic growth in the plan are overly ambitious and unjustified. In my opinion the level of growth is based on unrealistic economic forecasts, old population projections and ambitious assumptions.

In my opinion Warrington does not have a core impetus for growth on the scale presented in the Local Plan. There is no HS2 stop to drive growth, many residents work outside of the town and there is little proven desire for devolution (which requires ambitious economic growth targets) beyond the council itself.

By including these overly ambitious growth forecasts in the plan, it has a knock-on effect of overstating the need for housing to meet this growth. I believe a more sensible forecast needs to be included, which reflects the down-turn in the economy and the impact of Brexit. For these reasons I believe that the Local Plan is unjustified and unsound.

### **Housing Numbers**

Warrington Borough Council has said that the housing numbers in the Local Plan are set to meet the Government targets. However, The Secretary of State for Communities and Local Government has since confirmed that government housing figures are 'not a target' and that it is 'down to local authorities to make a realistic assessment of the number of homes their communities need'.

In light of this, I believe that the Local Plan is based on unrealistic housing numbers and should be reassessed, taking into account the actual need for housing across the town, as per the guidance. By using the latest population projections, population growth trends and demographic studies this is likely to be lower than the figures included in the plan.

In addition to this I do not believe that the annual average delivery of 945 new houses required in the Local Plan is realistic or deliverable. This is well above the current build rates in Warrington, where at its peak Warrington only built 545 houses per annum. In addition to this, the rate of build is determined by the developers, not WBC, who will only build what they think they can sell – so risking 'land banking' of green belt.

By including more realistic housing numbers I believe it is likely to have a significant effect on the level of green belt release required. If fewer houses are required there is more opportunity to utilise brown field sites in preference to green belt, so resulting in less green belt destruction. Due to the over-estimation of housing numbers I believe that the plan is unjustified, undeliverable and unsound.

### **Commercial Development**

In my opinion, the inclusion of large-scale commercial development as part of the Local Plan is totally out of place in this semi-rural location. I do not believe that the plans for the employment land are backed by any meaningful economic strategy for the town.

I believe that the focus on logistic and distribution developments on green belt land are misguided. It does not encourage sustainable economic growth and employment, as these sectors are becoming increasingly automated. They bring with them huge levels of traffic congestions and air pollution, with no effective mitigating actions detailed in the plan. The jobs they will bring are mainly low paid, low security and likely to be filled by workers from outside the area (as they won't be able to afford to live locally) – so adding even further to congestion and air pollution. In my opinion we will be destroying green belt for a highly polluting industry, which brings little in the way of skilled employment for the future.

I believe that no realistic traffic assessments have been undertaken to determine the impact on the M6 / M56 and the local road networks from tens of thousands of extra vehicle journeys per day. These roads are already struggling to cope with the current volume of

traffic on the roads and motorways – with traffic often gridlocked for long periods of time.

For all of these reasons I believe that the Local Plan is unjustified and unsound.

### **Green Belt**

I do not believe that the plan presents ‘special circumstances’ to allow the release of green belt. I do not believe that the plan meets the following four criteria for green belt release:

- To check the unrestricted sprawl of large built areas
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of villages
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land

One of the purposes of green belt is to preserve the setting and special character of villages. In my opinion the Local Plan fails to do this. The villages of Appleton Thorn, Grappenhall, Stretton and Walton will be engulfed by the proposed developments. Although there are ‘green boundaries’ planned these will do little to protect the separate communities. For example, the Garden Suburb Strategic Link is shown to run through Stretton, bringing with it housing and employment zones. This will be a major highway, probably a dual-carriage way at the point it transects Stretton. This is just one example as to how the development in the plan will destroy the character and distinct identity of these communities.

The loss of green belt will be most severe in south Warrington, with the loss of 80% of green belt here. The Local Plan should look to distribute this loss more equitably across the borough.

I believe that the plan does not fully explore the possible brown field sites across Warrington and has been too quick to identify green belt for housing and employment areas. Given the period of the plan there are other sites that could possibly be included under brown field sites, such as the hospital site (if it were to relocate) and Fiddler’s Ferry power station (if it were decommissioned). Even without these sites I believe that the plan should prioritise building on brown field sites first, before any green belt is released. This currently does not seem to be the case. For example, housing is planned for green belt in Lymm to start in 2020 – surely not all brown field sites will have been used by then?

For these reasons I believe that the Local Plan is unjustified and unsound.

### **Infrastructure**

I believe that the traffic infrastructure proposals in the Local Plan (and the Local Transport Plan) are very superficial without the necessary costings or indication of funding sources. For example, the Garden Suburb Strategic Link is shown as 'illustrative' with very little detail.

I do not believe that a coherent infrastructure plan is presented and no evidence shown that the proposals, such as the Garden Suburb Strategic Link, will do anything to reduce current problems of traffic congestion and air pollution across the town which will be hugely exacerbated by the proposed housing and employment developments. There seems to be little consideration for the improving the existing roads such as Stretton Road to link the developments. For these reasons I believe that the Local Plan is unjustified, undeliverable and unsound.

### **Social infrastructure**

I believe that little consideration has been given to the impact that the increase in population will have on the wider social infrastructure, such as health care, social care, education, etc.

While developers are required to make a contribution towards building the health centres and schools required, no indication is given of where the ongoing funding will come from to resource these sites. For example, a health centre can be built but there then needs to be the resources and staff to run it. Given the national shortage of GPs and nurses there is no indication in the plan where these will come from, the timescales involved and the ongoing funding. Another area for concern is Warrington Hospital. The new developments will put a huge strain on the hospital which is already struggling to cope. Although plans have been mentioned in the press about a new hospital, surely this is something that should be covered by the Local Plan and costings included.

I believe that it is vital for the resources for the wider social infrastructure to be in place before houses are built or the strain on existing services and communities will be overwhelming. In my opinion this is missing from the Local Plan. For these reasons I believe the Local Plan is undeliverable and unsound.

### **Air Pollution**

Warrington already has the worst record in the country for dangerous small 2.5 micron particulate emissions. This pollution can have a detrimental impact on health, with the particles entering the lungs and bloodstream. This is particular problem for children and the elderly. The Local Plan looks to encourage logistic and warehousing business to be established on green belt land and then to develop the surrounding area with housing, aimed at young families and the elderly. There are also plans to run a major highway through these new residential areas. All of these factors will reduce air quality further.

The Government's has announced new proposals to cut green house gases to zero by 2050. It will mean that emissions from homes, transport and industry will have to be avoided where possible or offset by planting trees. The Local Plan goes completely against these proposals, encouraging an increase in highly polluting traffic, house building on a massive scale and population growth, while destroying the green belt areas where trees could be planted to offset some of the pollution. For these reasons I believe that the Local Plan is unjustified and unsound.

Although I appreciate that Warrington needs a Local Plan to manage development over the next 15 years, I do not believe the current Local Plan is the right one for the town. I think the plan is based on over ambitious economic growth targets, which have led to higher than necessary housing numbers. This then increases the amount of green belt that will be destroyed.

Overall, I believe the plan is flawed and does not include important funding and phasing information. Much of the Garden Suburb development, which accounts for the most green belt destruction, is shown as for 'illustrative purposes only' – surely unacceptable at this stage of the consultation and approval process.

For all of the above reasons I believe the Local Plan is unjustified, undeliverable and unsound.

Regards

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