

Subject:
Date:

Objections to the Warrington Borough Council Local Plan
17 June 2019 16:48:08

I wish to have my comments below considered as part of the local plan consultation:

I do not feel that the plan is sound or deliverable for the following reasons

The population numbers used are from 2014 ONS data, although there are more up to date numbers available which are lower, and official figures predict population growth at a much lower level. Taking this into account there is no justification for the plan to exceed the calculated need (909 to 945 per year), and certainly no requirement to add a further 10%.

Bearing in mind the changing economic situation, the uncertainty over BREXIT, and the declining retail situation (many empty units across town) having a 20 year plan is not sensible, a shorter term would make more sense to avoid decisions being made that cannot be undone.

There is no full register of brownfield sites for the area, yet this plan should use all possible brownfield sites prior to building on greenbelt. The plan also does not confirm that brownfield will be used prior to greenbelt, this is not the right way to proceed, as further sites will become available through the period of the plan. Greenbelt should not be considered until all possible brownfield sites have been actually built upon.

Fiddlers Ferry site has not been added into the plan because it was believed it would be in operation until 2025 but SSE has recently announced that it will close on 31st March 2020. Assumptions made in the plan regarding it's future use by SSE may well prove true but this is a significant prime brownfield site - which if not utilised by SSE could still be used for alternative industrial use or residential development. It's early closure date would enable any site clearance to be similarly advanced. It has road and rail links, and should be put to use prior to greenbelt being considered.

Due to these points alone the plan is not sound with widespread flaws and weaknesses.

In the same way that the population growth figures are not justified, the employment proposals are not backed by any meaningful economic strategy for the area.

The industry employment area proposed for the South-East corner of the area, is proposed for a large area of greenbelt, There is no reason for changing the use of greenbelt; warehousing is not a sustainable long term employment option, with many roles becoming autonomous in the longer term. Any employees working there will have to use local roads which are not fit for an increased level of traffic (and the loan transport plan gives no real solutions to this). Clearly - comments regarding LPT4 are to be submitted separately so I will not repeat my various observation in full. However, I do feel that much of the LPT4 is at this stage too high level and conceptual to convince me (and many others, I'm sure) what will actually be delivered and when.

Unchecked housing sprawl will destroy the unique character of each village, the BC has admitted there is no money for infrastructure, and the money will also be needed for additional schools, shops, health facilities, public transport links, roads. IF WBC has learned anything from previous developments it must surely be that roads and transport links must be in place prior to residential and/or industrial building.

There is no full plan for the proposed building the South areas, roads have not been mapped, everything is "concept" only, how can the local population give full comment on the plan without details - there is no confirmation what is happening with the hospital, the local tip, a traveller site. The consultation period needs extending until full details are available to all. It is also confusing asking for separate comment on this plan and the local transport plan by the same date and time, I'm sure many will only send in one set of comments.

In my opinion it is also wrong to have the another of the serial planning applications for Stobarts (particularly when it's over-lapping their planning appeal) and Six56 within the same time period - these have already been included in the proposed local plan, despite not receiving planning permission (Stobarts has already been rejected). How can this be added in when it doesn't fit planning requirements?

The town already has air pollution issues which are dangerously high in places, this is a long term issue for the health of the population, and increasing possible HGV movements will only exacerbate this. Whilst it is

accepted the warehousing is being positioned on the outskirts of town, as now, if the motorways are busy the HGVs will use local roads to keep moving (they already use local village roads which have weight restrictions). Loss of greenbelt will mean a loss of habitat for local wildlife, the Govt has only just unveiled a plan to increase the number of trees planted across the nation to improve the environment, using our greenbelt is in opposition to this national plan.

I appreciate the need to build in margins when planning but do not understand the apparent desire to so exceed the minimum requirements when this drives the need to acquire so much green belt. Specifically the base annual housing requirement is 909 but WBC has then taken the higher figure of 945 so there is already a 3.96% uplift margin built in. However, WBC has then added a further 10% 'flexibility' margin and applied all of this over a period of 20 years rather than the minimum 15 year required by central government! This of course results in a commitment to an extra 6,625 more houses than the 'uplifted' (3.96%) minimum and a consequent requirement for more green belt!! Why?

It is not even clear from the Local Plan how the requirement for 'affordable' housing would be enforced on Developers. It is highly probable that if the Warehousing goes ahead many of the workers would require more affordable housing. How will WBC ensure these are built rather than Developers building more profitable housing for them (and making an allowance payment to the WBC).

I look forward to seeing how the Local Plan evolves to respond to the comments and concerns of Warrington residents and will then be happy to make more detailed comment on specific proposals.

Regards

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Warrington

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