

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Subject:** response to consultation  
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**Attachments:** [image.png](#)  
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Response from:

Dr Anne Hesketh

[REDACTED]

[REDACTED]

Warrington [REDACTED]

Mobile: [REDACTED]

I wish to respond to the Warrington Local Plan, especially regarding South Warrington and the proposed Warrington Garden Suburb (WGS). I believe the plan to be unsound in the following ways.

### **Predicted economic growth and housing need**

The housing numbers discussed in the plan are above those necessary for population forecasts, above the government suggested figures, and above what has been possible to deliver in Warrington in recent years. The plan is un-necessarily ambitious and therefore unsound in the current economic climate and with no relevant significant new local/national initiatives.

### **Community infrastructure**

Community facilities are a vital part of planning and health centres. In the Garden Suburb Development Framework (GSDF) four new primary schools and a new high school are mentioned, but with no estimated dates or exact sites. Government and council-funded services such as healthcare, education and youth and social services are already over-stretched, and pressures on councils to make further savings will exacerbate the problem without nearly 19,000 additional houses across the town. Reliance is on private money to support these, but cannot solve the known difficulties in recruiting education and health and social care personnel to staff them.

The National Policy Planning Framework (NPPF, para92) requires positive planning for necessary social, recreational and cultural facilities, but the current GSDF has no specific information on any of these. The plan should show whether and how it is possible to develop service and true community infrastructure concurrently with the building expansion.

We are currently looking for an alternative recycling site to replace the Stockton Heath centre, and the WGS proposal means a significant facility would be needed from the very beginning of development. The overall local plan document says there would be one in the garden suburb but again, there is no mention in the GSDF itself.

The Local Plan also acknowledges the needs of the traveller communities, and we currently have two settlements in South Warrington, but again there is no mention of these in the

GSDf.

The plan is therefore unsound in its underspecification of necessary community infrastructure.

### **Transport, traffic and impact on environment**

The motorways and waterways are fixed factors for Warrington and put a great deal of pressure on roads. The A56, A49 and A56 are the major routes into and across the town and the latter two become bypasses for the M6 whenever there is an incident on the Thelwall viaduct. The routes from the south have to cross both the Bridgewater and Manchester Ship canals, the latter via three aging and unreliable swing bridges which are in more frequent use due to the Peel Group's increase in shipping. An extra 5,000 houses in south Warrington means an extra 10,000 cars on roads which are already heavily congested, with bottlenecks at the water crossings on all three major routes. The town's train stations are both in the centre making crossing the Bridgewater and Manchester Ship canals necessary for out-of town commuting.

Section 9 of the NPPF is clear that the potential impacts of development on transport can be addressed (para 102a), and the environmental impacts assessed, identified and addressed (102d). The GSDf claims that the area is 'well-connected' by road to the urban centre, but the congestion on these roads makes that claim a nonsense. There are plans for one small-scale Mersey crossing and one large scale bridge linking Walton to the A57, but no additional crossing of the Bridgewater canal and nothing to help the new developments in the south-east of the WGS. We do not have adequate information on air quality in Stockton Heath, Latchford and Walton, or predictions about the impact of further traffic on this.

The plan is therefore unsound in its inadequate consideration of the serious traffic and transport implications of the development.

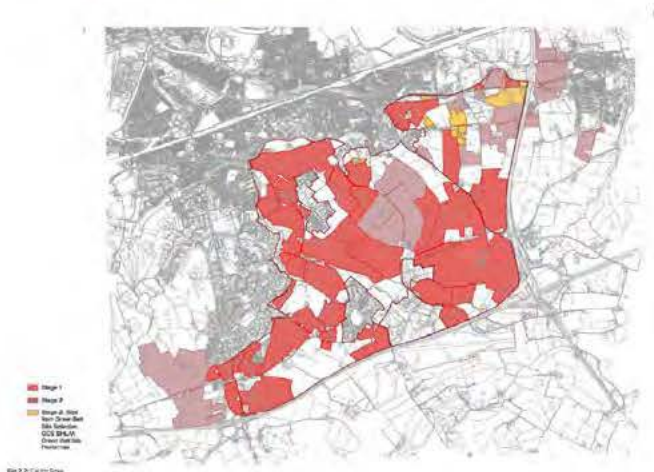
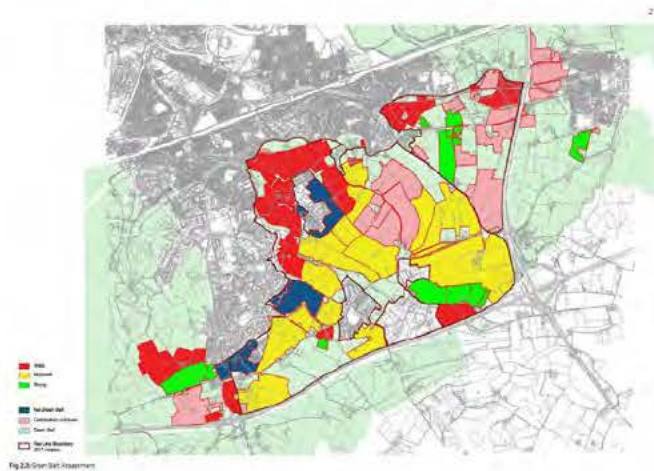
### **Use of green belt land.**

WBC claim that almost 95% of Warrington's green belt will be retained. However, other sources suggest 11% will be lost (parish councils' local plan working group) and, whatever the correct figure, most of this is in South Warrington. Approximately 5000 homes are planned for the WGS of which over 4000 would be on green belt land. The NPPF (paragraph 136) states that "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified", however, much of the local plan information is underspecified and confusing. Obviously some release of land is necessary across the borough but the proposal is for more green belt than can be justified and the space is being committed too long-term. Some of the proposed areas (eg around the airbase and the new SIX56) development are not currently publically accessible or even visible. In contrast, much of the green space around Walton, Appleton and Grappenhall is heavily used and much loved by residents, and the surrounding green aspect is an integral part of the environment. In the last few days, SSE have announced the closure of Fiddlers Ferry power station by March 2020. The council are proposing this loss of green belt for a 38-year plan, without giving due consideration to the use of a large area of brown-field land about to come into the picture.

The following three graphics from pp9, 19 & 21 of the GSDF show

- a) the huge proportion of current green space which would potentially be built on and
- b) that even plots making a strong contribution to the green belt are under consideration for development.

The local plan refers to respecting existing local character (p131) and says the urban core will continue to be “surrounded by attractive countryside and distinct settlements. (p24) ” This claim is obviously untenable when housing would stretch unbroken from Walton to Grappenhall with massive loss of green belt and space.



The following excerpt from p20 of the GSDF shows the contradictions and lack of clarity in the proposal:

“A parcel in south-wester [sic] part of WGS shall be used as an open countryside. Due to its position within a close proximity to the existing employment land and good connectivity, the benefits of the development of the parcel in the

south-western part of WGS are considered to be sufficient to propose it as employment land.”

Is it to be used as open countryside or as an industrial estate? It can't be both.

Mention is made of a 'new' country park, supposedly shown in 3 maps on p50 of the GSDF but as they have no key it is impossible to interpret them. The map on p55 suggests it is the Grappenhall Heys garden and the existing landscaped route to Grappenhall village.

What is billed as a 'new' green development and a future destination for recreation is apparently just a remaining portion of the existing green space. The NPPF is clear (para 96) on the need for high quality open spaces and also describes (para 99) the concept of Local Green Space which may allow communities “to identify and protect green areas of particular importance to them.” There is no mention of Local Green Space consultation in the GSDF.

The plan is unsound in its inadequate arguments for exceptional circumstances necessitating green belt use, and its inadequate consideration of alternative land.

**In summary**, the validity of the local plan has to be seriously questioned on a number of grounds, including the ability to build the required number of houses per year, the ability to finance and develop the transport and services infrastructure at the same time, the inadequate justification of use of the green belt in South Warrington, and the weak justification of the need for this amount of growth at all. The plan is unsound in its arguments for and its underspecification of how it would deliver the proposed development.

I have shown how the plan is unsound: it is **inadequately justified, ineffective** (underspecified and strategic problems not yet dealt with) and **not consistent** with all aspects of national strategy as set out in the NPPF.

Anne Hesketh