

From: [REDACTED]
To: [Local Plan](#)
Subject: Response to consultation on Proposed Submission Version Local Plan
Date: 17 June 2019 17:01:37

To whom it may concern

I am writing to set out my objections to the Proposed Submission Version Local Plan. [REDACTED]

[REDACTED] In particular, I am concerned over the apparent encouragement that has been given to the Stobart and Six56 industrial developments despite the wider site being subject to both a Neighbourhood Plan, previously supported by the Council as designating the area as Greenbelt, and this as yet incomplete public consultation or independent Government planning inspection. Given the significant number (4,500) and substantial objections to the preferred development options published in 2017, it is by no means certain that this wider land bank will be repurposed from its existing agricultural use, particularly given the national and international focus on climate change, environmental protection and food provenance/miles.

As the National Planning Policy Framework makes clear:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

It is not clear that Warrington Borough Council has undertaken any of these steps in proposing any Green Belt development. Even absent an approved and adopted local plan, NPPF confirms:

A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

None of these exceptions appear to fit the land repurposement within the Local Plan application.

The business case for the wider employment area development has been weakened from manufacturing and the associated skilled jobs to logistics, an increasingly automated sector with inefficient land density use and necessarily high traffic requirements. As automatic driving technology improves and alternatives to long-haul distribution are sought, this can only be negative for employment prospects.

The adjacent roads to this development are substantially "country lanes", often only a single unmarked and unlit carriageway with no pedestrian walkways. Any development requires material infrastructure development for which the Borough Council has no funding and it would be uneconomic for any one development to finance. Consequently, there is a material risk that this development would proceed on only the vague promise of a future contribution that never materialises. Moreover, the justification for logistics is the increased volume of online sales - if so, this will lead to the continuing decimation of not only the high street but also the retail parks in and around Warrington that already suffer many vacant units. This would suggest these units could be easily (and will need to be) repurposed as part of a justified brownfield investment programme. This is also the case for the land currently occupied by Fiddlers Ferry powerstation, the imminent closure of which has been announced and falling within the first five years of any Local Plan. Although this land may be deemed too contaminated for residential property, it would be very appropriate for alternative commercial use.

This development is going to cause a huge increase in traffic congestion and pollution and so a great personal inconvenience as well as risk to my children's health. Warrington already suffers one of the worst air quality assessments, by their own analysis leading to 145 premature deaths a year, and this development is just making a bad situation worse - how many more unnecessary deaths (from either pollution or, equally likely, vehicle manslaughter) would the Council like to take responsibility for? The UK Government's recently announced zero carbon initiative would appear to trump any previous reliance on supposed Government "requirements" for minimum house building targets that have forced Warrington to adopt such onerous and decimatory plans. In truth there is no evidence that the Government has forced or otherwise imposed housing targets on particular authorities - in fact, the summary of actions published by the Government suggest quite the reverse. Moreover the Minister for Housing has written with specific reference to Warrington to confirm that the ONS statistics are but a starting point for projections and should be amended as appropriate. What would seem most appropriate is all the ONS updates published subsequently showing a material downward adjustment in future housing needs. Reduced economic growth forecasts, national and local, coupled with falls in net immigration suggest that a number could be adopted completely within the Borough's brownfield site capacity, a capacity about to be accelerated by the Fiddlers Ferry site. Although the Council may hold to using 2014 data, this is ultimately a pyrrhic victory since the first formal review of any adopted plan is bound to follow the national adoption of more recent data series.

The use of brownfield sites has an enormous advantage over greenfield - the infrastructure is largely already in place. The Proposed Submission Version needs to be read in conjunction with the draft Local Transport Plan, with the emphasis on the word draft since it is absent so much detail and even less so funding as to make any assessment of its deliverability as risible! I would refer to my other correspondence with the Council - substantively a facility (medical centre, school, road) should cost the same wherever in Warrington it is cited and yet it seemed beyond the wit of the planners to estimate the total cost (and yet have been spuriously accurate, or not, in other areas of forecasting). Had they done so, then it would quickly have appeared that that the infrastructure plan was neither integrated nor, at £2-3bn, affordable.

I do not believe that Highways England have scheduled or budgeted for such infrastructure and any consideration has been stalled in the same way that the Government has not yet actually funded the Warrington Western Link (nor does Warrington have a readily available source of funds to finance their required contribution, not least of which the absence of signed off unqualified accounts will prejudice any additional borrowing facilities). The existing motorway junction 20 of the M6 and M56 is already congested and would need to be modified and expanded for increased traffic volumes else the economic cost of lost working time for all users of that junction, not just the new businesses, far exceeds any suggested benefit. Moreover, (the all too frequent) high winds that lead to a periodic ban of lorries over the Thelwall Viaduct to the immediate north of the junction, mean that vehicles will be trapped unless alternative exit routes are built. I would reiterate that the Council does not have the funding for this, nor do the prospective developers nor, it would appear, central Government. Only recently, the Council Leader expressed a view that it would be "tragic" for communities if any new roads were built primarily for the benefit of HGV drivers using them as a "rat run".

The impact of 24 hour HGV movements, multiple staff shift changes from commuters (there is no local affordable

housing or public transport) and, for example, the introduction of high level light pollution will have a big environmental impact on Warrington's Green Belt. The NPPF notes:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

The overconcentration of green belt release is in the south of Warrington and borders some very beautiful countryside and risks being the proverbial thin end of the wedge that destroys it and all the biodiversity it supports.

In summary, the Proposed Submission Version must be reconsidered as it is based on superseded economic and population data, it has disproportionate impacts on the Green Belt across the borough, creating an urban sprawl. It is not supported by a detailed and fundable infrastructure plan and transport strategy and ignores the feedback from the electorate to the PDO.

Regards

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