

WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN
2017 to 2037
Representation from Cllr Mrs Anna Fradgley, 13 June 2019

OBJECTION

Whilst I accept that some development is needed, I do not accept the scale and nature of what is being put forward as being necessary.

There is still a loss of large parts of the Green Belt, a 'Garden Suburb' and large logistic sites: all needless. My greatest concern is that there is no clear plan to improve local roads and the character and distinctiveness of the area in South Warrington will be dramatically changed forever.

I do not believe that all brownfield sites are being considered and I doubt they will be first to be built on once greenbelt is released, unless this is made very clear in the plan. Which it is not.

I am concerned about the plan and the impact it will have on Lymm.

THE PLAN

Economic Growth – this is too ambitious and not necessary when Warrington is a thriving town in terms of employment. The growth is driven by housing development and not by the genuine need to jobs. It is too *housing* led – and this is very clear.

Housing Numbers - contrary to what the Council is saying, the numbers for housing laid out in the Plan are not set in concrete. Should not the latest 2016 figures from the Office of National Statistics to be used as a starting point for calculating housing numbers? However, the Council has been told by the government to revert to 2014 figures. This is wrong and has presumably been done because the 2016 base generates numbers that are too low. Based on 2016 figures, the Council's Housing Strategy estimates that the population will increase by 18,874 between 2016 and 2041. Using the normal factor of 2.2 people per household, this equates to a need for 343 homes a year. This figure is in line with recent build rates of 359 in 2018/19 and 402 in 2019/20. Warrington's peak build was 545 in a year. In 2025/26 there is a peak build requirement of 1656 homes a year. I do not believe this is achievable and cannot be delivered.

Location of Housing - New homes should be built near to where new jobs are being created. There is a risk of a mismatch between the type of housing being planned for the south of the town houses (20 houses per hectare) and the jobs and associated wages / salaries for the jobs planned for this area. Skilled workers will commute out of the area from 'commuter estates' to their jobs outside the Borough and less skilled workers will commute into the area. This is not environmentally friendly. The position is made worse because both railway stations are in the centre of town generating more vehicular movements.

Affordable Housing - There is a need for genuinely affordable homes, not those at 80% of full cost. A blanket figure of 30% for affordable housing in outer

areas and 20% in inner areas is not acceptable. The rules for affordability need to be changed, such that they are based on a percentage of income rather than an arbitrary proportion of market price. It is the wrong priority to allow developers to get their way, so we end up with high value houses in the south early on in the Plan period.

Brownfield Land - There is an overwhelming need to build on brownfield sites first. This must be done before developers are allowed to take the easy and more profitable option of building high value houses on the Green Belt. Density has been increased in the town centre, but there may be scope for increasing this even more. The availability of the Fiddlers Ferry site is mentioned several times in the Plan. However it is said this is a possibility for the future and why is not part of the plan?.

Green Belt - I do not believe a valid case has been put forward to justify the loss of 11% of Warrington's Green Belt. This land is very precious and once taken it has gone forever. Too much of this loss is in the south and if any loss is required, then it needs to be spread more evenly. We are just sacrificing Green Belt for an over-ambitious Plan will just increase the profits of developers. The boundaries were confirmed five years ago and are supposed to last for twenty years. This makes a mockery of this process. The revised National Planning Policy Framework strengthened the protection of the Green Belt. Boundaries should only be altered where exceptional circumstances are fully evidenced and justified and all other reasonable options for meeting identified development needs have been examined. Very special circumstances have not been demonstrated and the Green Belt development fails on all five tests –

1. checking sprawl,
2. preventing the merging of settlements,
3. stopping encroachment onto the countryside,
4. preserving historic settlements
5. assisting in regeneration.

Employment sites - The Local Enterprise Partnership Strategic Economic Plan and Local Industrial Strategy identify a number of sectors with potential – manufacturing, energy and environment, life sciences, finance and business services, logistics and distribution. Warrington appears to be placing far too much emphasis on logistics and distribution. These sectors are already heavily automated and this will accelerate over the coming years generating fewer jobs. These industries require a large amount of space and generate a large number of traffic movements on a 24 hour basis.

Character & Distinctiveness - In the vision for Warrington's future, it says, "The character of Warrington's places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed". This completely contradicts what the Plan would do to the villages of Walton, Grappenhall, Appleton Thorn and Stretton.

Transport infrastructure - Congestion is currently a major problem on roads in the south of the town and at Junction 20 on the M6. If the M6 is closed for reasons such as high winds on the Thelwall Viaduct, then this causes major problems in the centre of town. There is a new dual carriageway planned through Stretton, Pewterspear, Appleton Cross and Grappenhall Heys. Is this really an HGV link road which would become a racetrack for lorries? If so, it would be in use 24 hours a day. Other local roads are needed before not after new houses are built. At present there are just vague lines on maps. No new crossing of the Bridgewater Canal is planned.

Air pollution - Air quality is a material consideration in planning terms. In May 2016, Warrington was named and shamed by the World Health Organisation as one of the forty places in Britain for breaching air pollution safety limits. The Air Quality Management Area on the A49 just north of the Ship Canal has recorded levels of Nitrogen Dioxide above DEFRA limits on occasions since 2013. Other pollutants such as Sulphur Dioxide, Ammonia and particulates have not yet been measured. The NPPF sys, 'the planning system should contribute to enhance the natural and local environment by preventing new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution'. It is already a serious problem in Stockton Heath and on the A49 through to Lower Walton and with an increase in the number of cars would only get worse. One reason for the Peel Hall planning application being rejected by the Inspector was air quality.

Environment - The loss of green spaces, whether Green Belt or not, has a wider impact on the look of the landscape. When entering the town the views of the landscape are important and should not be under-estimated. There are a surprising number of ponds that would be affected by these proposals. The Plan does little justice to the damaging effects on the ecology of the area.

LYMM

Housing numbers - I welcome the reduction of new houses from 500 in the PDO to 430. Nevertheless, this is too many given the new estates that have been built in recent years. Lymm has had its fair share. A reduction in the total number of houses (see a previous point) that are required and this would have a beneficial proportionate effect on the total numbers in Lymm. The Plan period starts in 2017 so any completions from then count towards the overall target. This means that the houses at Tanyard Farm and the proposed apartments on the site of the Lymm Hotel plus any smaller developments would count towards the 430 figure. I am concerned that developers would not see it that way and argue that 430 is just a minimum figure and any past allocations should be disregarded. The real demand in Lymm is for genuinely affordable housing. 30% is not high enough.

Location of sites - The four sites in Lymm are all in the Green Belt with the completion of the first houses by 2021/22. All the sites are to be developed within the first ten years. This is quite unacceptable and far too easy for developers. They will only come back in a few years time, asking for more development. They need to build on the brownfield sites first. The choice of

these sites looks like 'a done deal' because there has been no input from the Neighbourhood Plan Group, the Parish Council nor residents.

Neighbourhood Plan - Lymm has an extremely active Neighbourhood Plan Group which has been working very hard with plenty of engagement with the community. It is particularly disappointing that this Group has had no involvement in the selection of sites for housing. This is very demoralising for the volunteers and reminds us of all the hard work put in many years ago by volunteers on two Village Design Statements for Lymm which were ignored by planners once completed.

Transport infrastructure - We are concerned about the effect on our already busy roads of the new developments, but it is Rushgreen Road which is the main concern of residents. This is very narrow in places and several new estates have been built off this road in recent years. Many HGVs use it and weight limits are ignored. There is additional traffic if the motorway is closed and we believe air quality is a problem especially at the pinchpoints. There is considerable cynicism amongst residents, which we share, about the judgement of the Highways Department over traffic safety issues. There is an over reliance on recorded statistics at the expense of common sense and local knowledge.

Education - Reference is made to contributions from developers to both primary and secondary schools. This is welcomed, but has any consideration been given to the ability of the schools to cope with these additional demands?

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