

Dear Sir/Madam,

#### OPPOSITION TO LOCAL PLAN 2019 OF WARRINGTON COUNCIL

I object to the Council's local plan on several grounds. I am a resident of South Warrington and have grave misgivings about the Council's plans. The plan is not sound, is based on inaccurate and out-of-date assumptions and fails to consider all issues. It must be revised significantly or thrown out. It will have a very detrimental effect to the area and its green belt and, once passed, will be irreversible. All levels of government have an obligation to preserve our green belt and any encroachment of this land must be completely justifiable. There is little to no justification in this case in view of the irreversible damage to the area, its green spaces, wildlife, health of local residents and character of the area.

The plan would decimate South Warrington, leaving other more suitable sites relatively untouched. It is disproportionate and would destroy the character and distinctiveness of the area. The Council have failed to justify in any detail why it is necessary, merely referring to the need for a plan as required by central government. **This does not and cannot justify the action put forward by the council in its plan to decimate South Warrington's greenbelt.** Whilst the need for a plan is accepted, the current plan is wrong and must be changed.

In summary:

- There is no justification for the predicted growth; indeed the figures the Council have used are out of date. More recent figures indicate a lower level of growth. Furthermore, the Council overestimates the growth even based on the out-of-date figures. The council believes 18,900 houses are needed by 2037, an average of 945/year. This is complete nonsense. A previous estimate was nearer to 545 per year. The numbers are a starting point for consideration, not a target. The council seems to think that building houses on greenbelt land in South Warrington will help younger people get onto the housing ladder. This is ludicrous. The houses that developers plan will be very expensive and the council knows it. Very few first time buyers can afford £400,000+ for a property. Even flats will be well in excess of £200,000. The council knows that this reasoning here is badly flawed. If the council believes that huge numbers of new houses will alleviate house price growth, it is also misinformed and, frankly, deluded. It is likely that such new properties in the location proposed will increase demand from outside Warrington, leading to people from other areas to move in, maintain demand with the increased supply. If these new tenants decide to commute northwards, the consequences for South Warrington will be huge (see below).
- There is no need for so much housing and employment land. The employment areas will generate, in the main, lower paid jobs at the minimum wage or not significantly higher. The proposal that it is worth destroying Warrington's greenbelt for such jobs is completely wrong - and any level of unbiased, careful consideration would conclude this. Note that the local plan working group contains a number of heavyweight developers! It is unlikely that workers at these sites would be able to afford the high prices that the developers will charge for their new homes, increasing commuter journeys into an already congested area.

- There is no need for greenbelt release. National policy is that greenbelt use is a last resort in extreme cases. Other sites are available and are much more suitable. However, these sites might contain additional remediation work for developers and might also be outside so-called “premium” housing areas, such as South Warrington, thus diminishing potential profit. That is what this is all about: profit for developers and high council tax receipts for the council. This is not the basis for a sound plan. The basis should be what is best for the area as a whole, and the use of brownfields sites is surely better. The Fiddlers’ Ferry site is one such example of land that could be used, albeit at reduced profit for developers. The council should be reminded that it must hold the interests of Warrington above those of eager developers who see a chance to seize precious greenbelt land.

Note that the purpose of greenbelt includes checking urban sprawl and stopping the merge of settlements; the council’s planned developments would lead to an urban sprawl across the whole of South Warrington, from the A50 across to the A49 and beyond, north of the M56. That is the purpose of the greenbelt; to prevent this kind of sprawl. No wonder the council wants to encroach our precious greenbelt!

- There is no need for development that is likely to harm significantly air quality in the area and add significantly to congestion. The environment and residents’ health must be of primary concern to the council. The area is already very congested and is made worse when ship canal swing bridges close, with vehicles stationary in long queues, polluting the air. There is little respite from traffic issues in South Warrington, even at weekend. To add over 18,000 new homes to the area would further compound this horrendous problem. The council must have made serious checks on particulate and gaseous emissions (CO, CO<sub>2</sub>, nitrous oxides) in order to propose the action it has. It must have concluded that an increase is tolerable and would have no significant effect on the people of South Warrington and their children. If it has not done this, why not? It is a major health concern and the council has a duty of care. This objection must be considered in context: (i) an already high load of vehicles, (ii) the geography of the area with relatively few places to cross the canals/Mersey, (iii) the likely increased use of the ship canal in the coming years, (iv) the proximity to major motorways means that traffic floods into South Warrington looking to head North when there is a motorway blockage and (v) the additional load added to the pollution figures by the council’s plan. Are these plans sound in view of this? The council must have very good reasons and sound data to argue this. We are still waiting to see it.

As an example, say at the 10,000 homes-built point, pretend that only a quarter of those need to commute North into Warrington. After all, if the residents of all these new properties are not coming into Warrington, you have to wonder what the benefit to Warrington would be (other than the aforementioned Council tax receipts bonanza). A quarter is a conservative guess; the reality could be much higher. If each house has 2 cars, there could be up to 5000 additional vehicles per day trying to cross the canals and the Mersey. The effect of pollution and congestion, even for this conservative estimate, is very, very significant and is yet another example of the unsound nature of the council’s plans. It will lead to gridlock and poor air quality. If congestion prevents people from venturing north into Warrington, this will do nothing for Warrington’s fortunes and brings the whole plan into question.

- The council must also consider noise on the increasingly congested roads. The change to the landscape will also be serious and detrimental. Imagine driving along the A50 from the motorway when all these properties and industrial sites are built. Or from Daresbury? The view would just be urban sprawl; completely different from the pleasant green spaces we have now. This is a fundamental change of character for the landscape and is not justifiable on this scale. The countryside setting of these settlements will be lost as they merge into larger urban sprawls. character and distinctiveness of the villages to the South of Warrington will be changed forever. Appleton Thorn and Stretton effectively merge into one huge settlement! There also appears to be little in the plan to justify the destruction of local ecology. The plan understates this, even though its scale will be vast and damaging to local wildlife.
- We hear that infrastructure improvements are planned. These seem to comprise some additional roundabouts, a new road and some widening of existing roads. This is woefully inadequate and completely vague. It fails to deal with the problem of increased traffic in the centre of Stockton Heath and the choke points where traffic already struggles to traverse canals and the Mersey. Examples include London Road at the ship canal, the Ackers Road swing bridge at and Lumb Brook. One new crossing of the Mersey and Ship Canal is promised and no new Bridgewater canal crossings. **There must be more than one new crossing point over the canals (including the Bridgewater) and Mersey if this plan is to have any chance of being sound, notwithstanding the horrendous pollution issues outlined above.** The council cannot bury its head in the sand. The infrastructure at these points already struggles and adding thousands of new vehicles to the problem will make the situation unbearable. Widening roads, etc away from these choke points is as futile as moving the deck chairs around on the deck of the Titanic.

The council also foresees that Warrington will have some sort of mass transport plan by 2040. This is pure speculation and cannot be used in any way to justify its plans.

- The wider infrastructure must also be considered. The council proposes building homes on greenbelt land in South Warrington. These will be family homes predominantly and one wonders how the existing stretched infrastructure will cope. Health centres, hospitals, schools at infant, primary and secondary level, social worker case loads, policing and facilities for the elderly for example. These will all need significant upgrades if up to 60-80000 new people are to be welcomed to the area (3-4 per property). What is the council's plan for this? It cannot be done retrospectively in view of the numbers. Building nearly a thousand new homes a year means that these measures must be in place, or well underway, beforehand. Empty promises will not meet these demands and the council must demonstrate in a sound and clear way that all of this has been considered, can be funded and is planned in a concrete way (no pun intended). The council must also note that buildings are not just the answer; these facilities must be staffed. The Chapelford development has had issues attracting qualified medical staff, for example. There are numerous examples of infrastructure that was promised to get a development past scrutiny but that, years later, has never materialised. A sound plan must set this out in a clear and committed way with details of costs and funding. Planning to do "X and Y" is not sufficient without a realistic, properly funded and detailed plan to follow through. History has shown

that we cannot rely on developers to make these changes; once they have built their developments, sold them and moved on, they rapidly lose interest in promises once made.

In short, the Council's plans are unsound and unjustifiable. The plans should be rejected and alternative plans should be made that protect greenbelt, account for the unique geography of the area and protect the health of residents.

I would urge that these plans be reconsidered.

Yours faithfully,

Matthew Kelly

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16 June 2019