

Richard Buttrey



9th June 2019

Local Plan
Warrington Borough Council
New Town House,
WA1 2NH

Summary

I wish to object to the current scale and scope of the proposed Proposed Submission Version of the draft Local Plan. It is unsound, undeliverable and doesn't comply with legal environmental standards nor meet the area's needs when assessed on any reasonable basis taking into account all the special circumstances that apply to Warrington.

The Council say that they have listened to the comments from the previous Preferred Development Option (PDO) but I can see little difference between this current draft and the PDO so I don't accept that the council have met their duty to cooperate and listen to the previous objections. Further details in support of this objection are further below.

The plan projects 20 years ahead. The government only specifies a minimum of 15 years and there is no reason why Warrington's plan should be any more. No one can possibly predict what life will be like in 10 years with any accuracy let alone twenty. The Council's case for using this time period and the 6600 projected number of houses is that if they were to reduce either number the government will immediately step in and decide both the time period and numbers. As far as I'm aware there has never been a case where the government have done this. They have always asked a LA to think again. I therefore urge WBC to push back against the government statistics and submit a plan that is for 15 years and based on a much more sensible recognition of all the factors which currently make this totally unacceptable to the vast majority of the public.

Reduce the number of houses by using statistics that more accurately reflect Warrington's special situation and make the point to central government that Warrington is a special case. One where the physical communication infrastructure is already at breaking point with regular gridlocks on the roads which seriously compromise the environment with the pollution that comes from traffic. The plan is silent on new infrastructure and the Local Transport Plan has not yet been agreed. There is complete lack of joined up thinking. The Local Plan and the Local Transport plan are mutually dependent.

There is nowhere else I know in the country where a town or city the size of Warrington is constrained in the way Warrington is. Central Government should be reminded that within the borough we have three major motorways, the West Coast main North/South railway line, the Liverpool - Hull trans Pennine rail line, Bridgewater canal and the Manchester Ship canal with just

three Victorian swing bridges which cause local traffic chaos and air pollution every time a ship transits the canal and the bridges are closed.

Principal Objections

1. The Human and Social scale.

The current plan will eliminate all the Green Belt south of the ship canal. This currently divides the area into the quite distinct village communities of Grappenhall, Thelwall, Appleton, Stretton and Walton. If the plan goes ahead there will be one massive urban sprawl with the consequential loss of identity and 'ownership'. Societies work best when people feel an attachment. Once that is lost social cohesion breaks down with consequential disadvantages for society as a whole. Describing the area with Orwellian New Speak as a 'Garden Suburb' is just a cynical way of playing down what anyone with any common sense can see would be a huge loss for society and the public good.

Many residents currently volunteer in these communities in order to keep their identity. Grappenhall Community Library, Appleton Thorn bawming of the Thorn, Live at St Wilfrid's, Stockton Heath Festival, and various village Rose Queen festivals are just a few of the many examples of such community spirit. This plan will merge South Warrington villages into a vast urban sprawl. This is something we must avoid at all costs.

2. The NPPF and Exceptional Circumstances

The NPPF mandates that green belt may only be released in exceptional circumstances. The ONS prediction for population growth, even over the 20 years of the plan is only 528 houses per year, which is 44% less than the 945 house p.a. that the plan assumes (which itself is higher than the government's modelling figure of 909 houses p.a.) The difference is solely WBC's 'employment growth' projections which are predicated on the belief that distribution hubs like the proposed Stobart 656 development, (itself to be built if approved on green belt adjacent to the green belt to be taken by the plan) will require new housing for all the jobs they create. This shows a complete misunderstanding of how these things work.

First of all distribution hubs are becoming more and more automated as technology, AI and robots take over. They will not provide the number of jobs WBC believe and have planned for. Secondly those filling any new jobs will not all be Warrington residents. They will be people from Manchester, Liverpool, Stockport, Stoke, Chester and other places around the area, all within an easy 30 minute drive given the direct motorway access.

There are no therefore no exceptional circumstances, green belt should not be sacrificed and the plan should be rejected on these grounds.

The Basic Assumptions are wrong.

The plan may claim to provide affordable homes. However based on the evidence of two current developments (King's Quarter and Saviour's Place) the cheapest house is £234,395. Bloor Homes at Appleton Thorn has not yet released its house prices. Affordable homes relate to the current house prices in the area. Thus the so-called affordable houses in South Warrington are not affordable at all. This will be true of all the proposed development. As a consequence the proposed developments in South Warrington will not be going to young Warrington people trying to get on the housing ladder. If they were, I might not have such strong objections. The houses will be bought either by Warrington residents who are in a position to afford more desirable houses or, more likely, to people outside Warrington who want to use the area as a convenient commute to work as the developments are close to the motorway network.

Warrington has never yet achieved a build rate of 945 houses p.a. It is beyond belief that they could ever achieve this level of new housing development

The Environment

Green belt is the lungs of the environment. How is the population to be fed when green belt is concreted over and fields for crops and animals have gone?

There has been a great deal of media coverage about the destruction of our planet notably by the extinction rebellion movement. The bulk of the population supports the fact that we should do everything in our power to protect our environment for the future. It does not matter that any of the new homes will be eco-friendly as I have been told (and I question whether they will be) because once our countryside has gone it has gone for ever. The habitats of wildlife (animals, insects, flowers etc) will disappear. These cannot be replaced by the occasional tree-planting and manicured linear parks. We need natural habitats for our flora and fauna to thrive and to absorb rainfall to prevent flooding.

On top of this, the question of air quality needs to be considered. Much as WBC believes everyone will use the mythical "mass transportation" system (shades of an Orwellian future) they are very misguided. I estimate that the majority of people buying houses in these new developments will have and use 2 cars. This means that places like Stockton Heath will be both gridlocked and highly polluted. There is currently no new provision for mitigating the congestion either in the form of new roads, motorway junctions or canal crossings to service the proposed development.

No New Infrastructure.

The plan has little to say on the infrastructure necessary to support an extra 7600 houses. The A49 through Stockton Heath is already gridlocked even when the ship canal bridge is open. Even if every additional house only has one car (itself unlikely since a significant proportion of homes south of the canal have at least two), and even if only 20% of these are on the road at the same peak times time that means a potential of > 1500 additional cars on the road. The Local Transport Plan has not yet been agreed but there is little evidence of any realistic joined up thinking. There is grand talk of a mass transit system, and even that people will use pedal cycles rather than driving. This is completely unrealistic.

There's no planning for the supporting infrastructure of new schools, or doctors surgeries to meet the requirement of an additional 18,000 people (assuming an average of 2.4 people per dwelling)

Developer not Resident Led

The precursor to the 2017 Preferred Development Option was entirely developer lead. Neither the public nor the local parish council's had any significant input and this has allowed developers to influence and skew the overall process towards the wishes of developers rather than residents. Had the residents and parish councils been consulted earlier in 2016 then the outline and plan development would have been quite different, and challenges to developers and their assumptions would have resulted in something quite different tiowhat we now see. There is a duty to consult the public, not only with a nearly 'fait accompli' situation but at the early stages. The failure to do this has meant that the plan is unfairly skewed to the requirements of developers.

Brown field and empty buildings

There are many empty properties within the urban area and it's not at all obvious that these have been factored in. These should be developed and improved, by CPOs if necessary.

Most young people these days want to live close to town and city centres, they are not interested in outlying 'Garden suburbs'. Brown field sites should be used to develop medium rise apartment blocks.

New Town House and Quattro are being demolished and the area is to be used for housing to “reduce the risk” of needing to build on Green Belt. I look forward to hearing from WBC how much this will reduce the current proposed numbers of houses in South Warrington. Councillor Hitesh Patel has recognised that there are “understandable” concerns over development in green spaces and that such development is “a last resort”. I sincerely hope that he carries out his words. Unfortunately he goes on to patronise the residents of South Warrington by adding that “*sometimes the public don't always see the different activities undertaken by the council and the administration to address some of our housing demand.*”

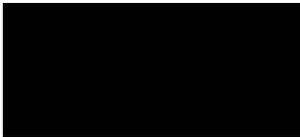
As an intelligent and highly educated resident of South Warrington I can assure him that I follow everything that WBC does and am well aware of what is happening. I am also fully aware of what

housing is needed - and that is truly affordable housing for the local population. The South Warrington Development Plan definitely doesn't achieve that.

The Fiddlers Ferry power station site is being decommissioned. This is a large brown field site and should be included within the plan. Of course developers prefer to develop on green belt for the simple reason it is cheaper. The council have the view that developers won't develop this site because the cost of clearing up any contamination will make any development unprofitable. That avoids the point that in this environmentally conscious age someone, at some point is going to need to clean it up anyway. This is just a question of who pays for it. If developers want to develop then they should be required to contribute to any decontamination costs.

It doesn't appear sufficient attention has been paid to this aspect. If brown field sites and empty buildings were developed, including medium rise apartments there would be no need to use green belt land at all.

Yours sincerely



Richard Buttrey