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Local Plan  
Planning Policy & Programmes  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA1 2NH

Dear Sirs

**Warrington Proposed Submission Version Local Plan 2017- 2037**

I believe that the plan is unsound for the following reasons:

**Objective W1/Policy DEV1**

The predicted growth is unjustified in a time of Climate and Environmental Emergency. It is also unsubstantiated and overly optimistic.

In this time of uncertainty, the plan period should be for the shortest possible time. Removing the 10% flexibility and using 2016 figures would result in a housing figure of only 343 house per year, not 945. It is up to WBC to use the most recent figures available to identify actual need as there is no target set by Government for housing.

There are 3202 households waiting for social housing which must be a priority, not the so called affordable housing.

There is no need for housing in Lymm or Walton as there are no plans for economic growth in those areas. The release of Green Belt is unjustified.

The Garden Suburb will provide expensive housing, not affordable by the majority of those working in a distribution centre. There is a lack of infrastructure to get to the Garden Suburb from the centre of Warrington and this would also contribute to increasing the carbon footprint. As stated above the figures for economic growth are exaggerated. Warehouses and even HGVs are becoming increasingly automated and the Omega site is a good example of failing to deliver the claimed number of jobs. Around 7000 jobs were created or 'safeguarded' (relocated) not the 24000 proposed.

In a time of Climate and Environmental Emergency economic growth must not be at the expense of Green Belt. Growth should be targeted to renewable energy, agriculture, flood defence and care for the health and well-being of the current population.

### **DEV3**

A site is required for travellers in transit is a priority. To balance the sites evenly around Warrington this should be in the north east. There is brownfield land available, perhaps using empty warehouse land at Omega or Birchwood.

### **DEV4.**

As already stated above, the speculative warehouse developers vastly exaggerate the job prospects. There are empty warehouses all over Warrington so there is no need for more warehouse space. The Omega site at Burtonwood claimed it 'could' provide 24000 jobs. Before the expansion phase 'Mount Park' commenced the figures released amounted to only 7000. The expansion site 'could' support up to 2000 more jobs however only one of the three warehouses proposed is being used and that is a relocation from the Post Office distribution office. The promised jobs are not delivered and now there is another empty site which the Post Office left behind.

### **GB1 /DC4**

There should be no release of Green Belt in a time of Climate and Environmental Emergency. This plan involves the loss of part of Moore Nature Reserve and Green Belt which is the habitat to a wide diversity of species, including those at risk. The ecological impact of the DLP must be considered as a whole. The extent of the decimation of habitats is masked by treating sites individually. However, as with the Garden Suburb, neighbouring habitats used as justification for the decimation are then lost in the adjacent development. The Green Belt habitats in Warrington must be preserved and managed by conservationists. Developers in Lymm are cutting down trees shown as retained in approved plans, with no enforcement action being taken by WBC. Such offences should lead to heavy fines and a minimum of 50 hours community service for the developers and all those on site. The Green Belt boundary was only confirmed 5 years ago in a plan that was deemed fit for 20 years. We need to preserve all the Green Belt we have left.

### **.PolicyDC1/ OS6/OS7/ OS8**

There must be no more loss of Green Belt in Lymm as development has already spiralled out of control and is unsustainable. A new medical facility is required for the current population, particularly since there is a higher percentage of elderly residents. Any further development must be on previously developed sites, and there must be no more houses unless the required infrastructure to sustainably support the current population is in place.

### **INF1**

The **traffic infrastructure** needs to address the current issues before there is any more development of houses or logistics industries. The motorways are at capacity already, with frequent incidents. The swing bridges add to the congestion if they are open or malfunctioning. The plans to increase cycling will not materialise unless there is major transformation of the centre of Warrington to make cycling safer. Public transport is expensive and involves lengthy journeys as most routes require going to the centre then out again.

Port Warrington is dependant on the Western Link which requires building of 24000 houses to secure funding - this is undeliverable. There will be an adverse impact on traffic if the swing bridges are open more - it is an unrealistic plan. Warrington needs to take urgent action to deal

with the current issues of air pollution, congestion and emissions and set a challenging agenda to achieve net zero carbon before 2030. See also ENV7.

### **INF3**

The Statutory undertakers for Telecommunication need to address the current issues before being given contracts for new development. All the existing population of Warrington, without exception, should have access to reliable Broadband Speeds of at least 10Mb/s.

### **ENV 8**

The air quality in Warrington is listed as amongst the worst for PM2.5 - it is worse than in both Liverpool and Manchester. Unfortunately WBC do not follow the policies and guidelines to improve air quality eg the Air Quality Action Plan.

The Air Quality Status Report claims that Warrington Council have no control over the levels of pollution in the Motorway Air Quality Management Area. However in the DLP a logistics centre and 5000 more houses are planned, just outside the Motorway Air Quality Management Area. According to the Air Quality Action Plan WBC will ensure that 'developments that could have a significant detrimental impact are not approved.' This policy is ignored, for example by approving the HGV wash facility at Lymm where background NOx is already above Air Quality Limits. This facility will bring 100s of queuing HGVs into a residential area, contrary to Government policy. The Draft Local Plan is in direct contradiction to the Air Quality Action Plan.

More monitoring of air quality must be done to prevent developers using computer models. There must be no development in areas most at risk of poor air quality, or in adjacent areas.

### **Policy DC6/ENV8**

**DC6 1f** This states there should be no development if there is unacceptable adverse impact on the amenity of neighbouring properties. This wording is insufficient to protect residential amenity- 'unacceptable' is far too open to interpretation. Stringent policies need to be drawn up to show what is acceptable and what is not and the policies must be followed not ignored. WBC have allowed development of B2 - general industrial which by definition causes loss of amenity, next to a residential area. The HGV truck wash development in Lymm was passed despite failing to provide studies into the impact of queuing HGVs turning their engines on and off repeatedly on noise and air pollution. The background noise is already high as it is near the M6/M56 interchange and NOx is above Air Quality Limits. Some of the local residents have lived there before the M6 was built. Now they will not be able to enjoy their gardens during the day due to the noise and air pollution from the truck wash and queuing HGVs. To pass this development WBC have contravened policies in the LDP and the Constitution.

### **ENV2**

There is a greater danger of flooding so it is not sound judgment to concrete over Green Belt.

**ENV7** This policy needs to set challenging targets to meet the Climate and Environmental Emergency and achieve net carbon neutral by 2030 if not earlier.

The DLP and LTP4 need to be rewritten so WBC is net zero carbon by 2030 or sooner.

The National Planning Policy Framework requires the Plan to be aspirational but **deliverable**. I do *not* believe this Plan is deliverable and is therefore *unsound*:-

The annual average delivery of 945 new houses is more than double the current build rates (359 in 2018/19).

Most funding for infrastructure comes from developers - it is not guaranteed.

The plan for South Warrington is based on over optimistic figures for jobs and vastly exaggerated housing figures. Based on evidence from the current situation at Omega, the promised jobs will not be delivered, so there is no justification for the housing figure.

The plan should deliver social housing as there is an evidenced need for this - homes are required for those on low incomes, the elderly and disabled.

The aims of the DLP should be to achieve net zero carbon by 2030 or earlier and look after the health and well-being of the residents already in their town. The over optimistic and unsubstantiated growth is contrary to these aims.

Yours faithfully,

Neil Hoskinson 15/6/19