

## Response to the Warrington Draft Local Plan from Sue Marten of [REDACTED]

It is hard to know where to start in responding to the Warrington Draft Local Plan (DLP) as there are so many things that make the plan unsound and undeliverable but here goes.

Warrington Borough Council (BC) have used the 2014 figures for growth as recommended by Government however they have then increased these and then calculated the land requirement for housing and added in 10% to this figure as contingency. One of the main arguments for the level of growth for housing is the increase in jobs and for jobs is the new housing. This circular argument alone makes the plan unsound. This level of growth is unjustified and this is shown by the large gap between the results using the 2014 and more recent figures. The council would be justified in challenging the calculation indeed the Secretary of State for Housing, Communities and Local Government responded to an enquiry that these figures were not a target, they were a starting point and councils should make a realistic assessment of their housing need. Is the reason the figures are inflated to release the maximum possible greenbelt land? The housing figure is around double the maximum that Warrington has managed to build per annum so is highly likely to be undeliverable. I find it extremely disappointing that the 4,500 objections to the Preferred Development Option (PDO) have made no substantive difference to the DLP.

The National Planning Policy Framework (NPPF) states that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”. As I believe that the growth is exaggerated then clearly exceptional circumstances do not exist. Also the council have a policy of using brownfield sites first as dictated by the NPPF however they contradict this by putting some of the greenbelt development into the first tranche. Surely the only greenbelt release at this stage should be that needed for the early stages of the plan, this would probably mean that little or no greenbelt was required. A new plan is needed in 5 years’ time and this would be reviewed then. Most of this greenbelt land is currently used for agriculture and is classified as grades 2 or 3 agricultural land i.e. the best and most versatile as described in the NPPF:-

Chapter 15. Conserving and enhancing the natural environment

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

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;

This supports the statement “We want the planning system to contribute to our objective of no net loss of biodiversity; to encourage local authorities to promote multi-functional development so that we get the most from land; and **to protect our best and most versatile agricultural land.**” In the Governments publication [The Natural Choice](#)

The NPPF also states that:-

83. Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

The loss of 11% of the boroughs best and most valuable agricultural land over a 17 year period is irresponsible, damages the country’s food security and contributes towards climate change rather

than mitigate against it. At this time of political insecurity and the increasing likelihood of a no-deal Brexit, the council should be taking a conservative (with a small “c”) approach, particularly with regard to food security. The announcement in the last few days that the UK is setting a net zero carbon target should initiate a significant rethink to relevant parts of the DLP. There are no policies in the DLP towards improving rural businesses.

Many towns are bisected by a river as conurbations grew up alongside a watercourse and of course they also have railways running through them but Warrington is unique in having 2 canals a river and a railway dividing the north and south of the borough and also having the Mersey as the Lancashire Cheshire county boundary until relatively recent times. The planned developments in the DLP and the Draft Local Transport Plan (LTP4) will undoubtedly exacerbate this north south divide by significantly increasing the amount of traffic in the south east of Warrington and yet not providing improved road links into the town. The DLP cannot be considered in isolation from the LTP4 as so much of the proposed development is dependent on infrastructure changes. I fully support the report produced by Rethinking South Warrington’s Future on [the shortcomings of LTP4](#), which make the DLP undeliverable. Despite the current traffic issues from the southeast of the town to the town centre there are no planned improvements to the roads into Warrington and with the proposed increase in commercial traffic along the Manchester Ship Canal and the major proposed housing and employment areas in the south east this will clearly worsen.

The DLP states that Warrington has an issue with air pollution and that the major source of pollution is transport mainly road transport. Warrington has been in the top 5 towns and cities for air pollution and even more worryingly has been top for the most dangerous to human health small particulates PM2.5. There appears to be only a single monitor for this which is located at Sacred Heart Primary School in Selby Street. It is part of Defra’s Automatic Urban and Rural Network (AURN) which is managed by the Environment Agency. There are multiple sources of small particulates, some primary, others secondary and unlike some other air pollutants they can travel large distances from the source. These facts give immediate rise to a number of questions: -

- Has any source apportionment been carried out?
- Is this site representative of the whole of Warrington?
- What causes the spikes that are seen on the graph?
- Has monitoring of any other sites been carried out?
- What are Warrington BC doing about it?

I note that it has been reported in the [local press](#) that Stockton Heath Parish Council are purchasing air quality monitoring equipment that will measure a number of substances including particulates for what seems a nominal sum of £4K. Surely this is the role of a responsible Borough Council? The scale of development and reliance on logistics for employment opportunities are destined to lead to a further deterioration in air quality.

The [announcement](#) in the last few days by SSE the owners of Fiddlers Ferry Power Station that they will close it next year releases a huge brownfield site available for development. This means that much of the DLP needs to be revisited in order to make use of this site.

The Appleton Thorn Neighbourhood Development Plan (NDP) was produced after much consultation with Warrington BC Planning Department and with a significant input of time and effort, not to mention expense from residents. This was adopted by Warrington BC on 19<sup>th</sup> June 2017. Appleton Thorn is the only Warrington ward to have an approved NDP. The DLP contravenes a number of the policies in this NDP namely:-

- AT-D1 Design of Development Of Appleton Parish Thorn Ward – it would destroy local identity, sense of place, and village character
- AT-D2 Protecting local landscape character and views - the proposed massive employment area on the eastern side of our village destroys village character and green space including local habitats and wildlife corridors
- AT-E1 Employment - is not converting existing buildings but proposing a large loss of greenspace and Green Belt totally out of scale with the surrounding area and will undoubtedly have a detrimental impact on surrounding residential character and amenity
- AT-TH1 Management and Transport – the significant increase in traffic is unacceptable
- AT-CF1 - green spaces are not protected

I therefore believe that the DLP makes a nonsense of having an NDP and as such undermines the whole NDP process.

As I have come to realise the importance of the Local Plan I have been discussing it with friends and neighbours. As a relatively recent incomer to Warrington I have been astonished by the lack of trust in Warrington Borough Council. This appears to originate from their historical record of building new developments then failing to deliver the promised infrastructure changes to accompany them, the refusal to respond to questions and until recently not allowing questions from the public at council meetings, and a perceived unhealthy association between the council and the business community, in particular developers.

I trust that these constructive comments can be incorporated into a revised Local Plan prior to sending it to the Planning Inspectorate.

Regards

Sue Marten