

To: Warrington Borough Council
External Government Examiner

30th May 2019

From: Dr Kevin T McAloon *

[REDACTED]

Re: Local Plan – Proposed Submitted Version (LP-PSV)

Dear Sirs,

I thank you for the opportunity to comment on the LP-PSV during the recent 9 weeks consultation period. Overall our close-knit community of Appleton Thorn is some 1200 residents and we are part of the Appleton Parish Council jurisdiction which, with considerable community support, produced Warrington's first Neighbourhood Development Plan (NDP) in 2017 in an attempt to preserve green landscape and rural character of our village. I therefore submit the following representation on behalf of the Appleton Thorn village community which comprises Appleton Thorn Village Hall (200+ members, several hundred user clients), village campaign groups CARE & ATDLG (30 committee members plus many Appleton Thorn village supporters), Bawming Committee (20 + large village support), Appleton Thorn Village Choir (40 members), and the Thorn Ward Neighbourhood Development Plan group team members(10+ committee), and local business RTH Ltd, Arley Rd (chair Ray Humphries with 150 employees):-

Some parts of the LP-PSV plan are attractive – parts of the vision for improving Warrington indeed is commendable (eg the plans for the centre of town ** and, excepting its access road proposals, the development of the Port Warrington/ Warrington Waterfront concept ***).

**but are the proposals sufficient to trigger strong regeneration?

*** but alongside competitive locations Port Liverpool and Port Manchester/Salford with multimodal freight transport facilities, will this be a sufficiently attractive location for viable use by businesses, logistics and distribution companies and will there be sustainable infrastructure in place to allow easy access for commercial traffic so close to Warrington Centre?

Overall we have serious doubts that many parts of the outline plan are sound enough to be acceptable and truly deliverable. And for me KMcA personally, as a long term resident of rural South Warrington approaching some 50 years in Appleton Thorn (ATH) , I too am dismayed with the new Local Plan (LP-PSV) and backup Transport Plan LTP4 proposals in some very important aspects – scope, scale, policy justification, and strategic soundness, and therefore I have concerns about overall deliverability.

In particular, the A Th community objects to the LP-PSV for the following important reasons:-

1 Introduction and Overview

1.1 LP-PSV: The big picture

With its proposed aggressive implementation of large housing, commercial, and infrastructure developments over the forthcoming 2 decades much of this Plan will represent a gross violation of the existing extensive rural landscape across Warrington (W) including significant proposed Green Belt (GB) destruction. This would destroy the unique rural character and distinctiveness of the South W area in particular. For all of Warrington, the provision of 18,900 new homes @ a build rate of 945 homes pa and 362 hectares of employment land over 20 years with supporting infrastructure (roads, schools, retail, etc) seems aggressively ambitious and we believe this rate of build will be unsustainable compared with Warrington's previous historic delivery (best year, around 550 pa). It seems growth predictions are unsound coming locally from the Local Enterprise Partnership and there is no sound evidence to back up predictions. The planned number of homes is beyond government housing targets. And the use of older 2014 economic/house projection data and a formula recommended by the Government is only loosely justified so there's not enough confidence in the accompanying evidence base concerning the Council's housing forecast. Equally the amount of commercial land needed is also overestimated as it seems it is based on supposed availability rather than a meaningful economic strategy.

1.2 South Warrington and the Garden Suburb (GS)

A GS Framework document is stated by Warrington Borough Council (WBC) 'to understand how much development land is realistic, to further identify development options and infrastructure requirements and to demonstrate that the allocation in the plan is deliverable'. Also they state the document is purely illustrative and the plans within have no formal planning status and are not approved by Council Policy. We regret that some residents are confused by these statements. They believe they do not need to assess this framework but await until a more formal plan is available when they will have an opportunity to comment on a more robust document showing the preferred plan. Nevertheless we comment as follows:-
In the area around S Warrington villages, the loss of large parts of green space and GB in favour of a 'Garden Suburb' (policy MD2.1, MDA2.2) with the creation of 3 more 'villages' providing large scale housing (eg 7,400 houses with 5,100 homes delivered during the 20 year plan period AND 4200 on Garden Suburb GB alone) and a huge commercial development of 116 hectares (essentially extensive logistics sites eg Langtree's Six56 and Stobart's National hub) would

result in extensive unwanted urban and commercial sprawl, upon A Th boundaries. In so doing GB boundaries will be shrunk. Therefore we disagree with LP-PSV WGS point 10.2.10 (p179 Local Plan), rather A Th's identity will be changed permanently with the juxtaposition of large new developments on A Th boundaries from nearby Appleton Cross (housing) and Barleycastle and Grappenhall Lanes(massive commercial). For detailed development site requirements (MDA 2.3) the size of the proposed employment area is overwhelming and its necessity must be challenged (MDA2.3.27- 28). It is policy MD2.1.3 which states the GS will comprise existing and 3 new villages. This makes 11 SW villages instead of the current 8 villages on the same area which would densify development on this land area to the extent this would create compressed overlapping urbanization thereby destroying existing rural and village character and there would be much more traffic on local roads. For example, the new Appleton Cross 'village' would merge into the northern boundary of the existing Appleton Thorn village. An 'illustrative' map of SWarrington shows the locations of major features eg a central neighbourhood centre, a green infrastructure network of open space and parkland, the basis of a country park. This still reduces the amount of overall green space. The large overwhelming employment zone is also displayed. We especially object strongly to the latter as it would spoil the rural character of the A Th and Grappenhall area with up to 70% of commercial activity likely to be warehousing with large scale unsightly 'sheds'. Large unrelenting HGVs traffic would create day and night, close to our village, substantial air quality, noise, and light pollution. It is noted in MD2.1.5 that a broad range of infrastructure would be promised and would support the GS including roads, a secondary school, 3 local centres etc. There is no information on how this will be funded

1.3 Impact on SW Residents

Residents of S Warrington including A Th and local business employees currently rely heavily on cars as their means of transport and this frequently gives rise to significant traffic congestion at peak morning and evening times, especially along the A49 and B5356 near junction 10 of the M56 and along the turn- off on Barleycastle Lane onto the B5356 approaching A Th. Outline phasing plans for necessary new infrastructure are unclear and unless considerable asyet unproven funding is committed, seem inadequate to cope with the expected large volume of additional domestic and commercial traffic. For example the phase 1 and the assumed priority 1 proposed new strategic road link is only described in 'illustrative' terms. This would be an unacceptable new major 40m wide road which will wind its way through prime green fields from Stretton M56 junction 10 roundabout down to Grappenhall and up to the A50 roundabout on junction 20 of the M6. It is evident that this would be intended for commercial traffic as the scale of the road is much larger than any of the existing local roads including the busy B5356. So

the resultant poor air quality from pollution from the additional traffic on this road with its associated health hazards would be even more unacceptable for ALL residents in S Warrington, an area which acts as the 'eco-lungs' of Warrington as a whole. And the presence of an additional 10,000+ cars from new local housing developments of 5,000+ homes adds to this problem. And the vision for the Local Plan LP-PSV as a whole viz 18,900 homes over the whole of Warrington makes the air quality problem huge.

Removal of green space would make the situation worse. Warrington has already been reproached by Government for its unacceptable poor air quality especially near the town centre (ex Warrington Guardian).

Furthermore current air quality concerns from residents in Stockton Heath and lower Walton would be further exacerbated by increased domestic and commercial traffic flows around S Warrington.

Traveler sites and a community recycling centre are proposed and we recommend that A Th residents should be consulted on their size and locations.

Solely from a pollution based health perspective and Green Belt violation perspective, the LP-PSV is deeply flawed and unsound.

2 Economic Growth:

Please see section 1.1 above. The availability of economic data which is reliable from various sources including that from the 2014 Local Plan makes town growth estimates challenging. Some data sets can be confusing and even contradictory as different economic data with updated assumptions become available over the years. Data used in this LP-PSV seem to be based on some sources making optimistic assumptions on growth projections and unsurprisingly present an over ambitious and therefore unrealistic forecast compared with Warrington's historic slower growth rates.

We therefore ask 2 important questions a) Has adequate bottom- up input and subsequent analyses taken place eg from meaningful data generated by a number of sources (such as Warrington Matters, Warrington Means Business, Enterprise Partnership 'Strategic Economic Plan', etc) as a crosscheck to give more confidence about the assumptions used and the conclusions reached? b) Has the economic impact with growth projections of neighbouring Councils (St Helens, Liverpool, Manchester) on Warrington's economy been analysed as a cross check? It seems Warrington's growth projections may be driven mainly by optimistic housing numbers creating economic benefit rather than vice versa.

Overall, the economic justifications and projections must be suspect and unsound as they are based on an over optimistic economic view put forward by Warrington's LEP. Even though Warrington continues to be economically attractive for companies, we would contend that those projections are based on data probably several years out of date and unsustainable in the current climate of uncertainty. Whatever, any perceived economic benefits do NOT outweigh the harm to South

Warrington, especially with respect to its surrounding communities and Green Belt land.

3 Commercial Developments:

These are massive and focused mostly on South West Port Warrington and South East Warrington (Barleycastle Trading Estate).

Regarding the latter, businesses with true manufacturing capacity offer greater opportunity for wealth creation and economic growth compared with the large volume but lower economic potential from logistics schemes like the Langtree/ Panattoni and Stobart proposals. Job creation will be largely limited to lower pay logistics work inc transportation jobs, limiting local wealth creation needed for positive economic growth. With such low average remuneration terms working in this Logistics sector, many employees will find local housing unaffordable so they will live outside the area and will have little to contribute to the local economy. According to a recent May 2019 Warrington Guardian article there are also alleged serious health & safety disadvantages in retail warehousing jobs as the stress on workers for more efficient product delivery from some distribution companies can lead to significant health and safety related problems. For some companies this was manifested by a significant number of emergency ambulance call outs over the last few years. Responding to the bombshell call-out figures, Matt Draper, of the Unite Union claimed 'the warehouses at some companies risk becoming the dark satanic mills of the 21st century'.

Technical constraints such as the introduction and increasing use of constantly improving new generation AI technology will further negatively impact the number and value of local jobs and therefore further negate any opportunities for any valued local economic growth. And the legacy these logistics premises will leave behind is a permanent blight on previously valued countryside, some of it GB land which should be untouchable. Overall therefore economic factors and assumptions set out in determining any strong positive growth in the LP-SVP are uncertain, and WBC should concede it is therefore mostly unreliable. So there are major questions about the soundness and delivery of the Council's overall economic and business strategy. We therefore recommend that these assumptions must be rigorously tested before any permission is granted to implement any major commercial development proposal as part of the Local Plan.

4 Housing:

LP- PSV aims for approx 19,000 houses deliverable within 2 decades, with 5131 in the 'Garden Suburb' (GS) to the SE of the Borough, 1631 in Walton in the SW, and 430 in Lymm. This corresponds to an average rate pa of 945 compared with the previous Warrington peak year (2010) of 693 (2013/14) homes pa. Therefore 18,900 in total and 5000 or so for the proposed GS is over-ambitious and unrealistic based on historic home delivery data, in turn making new build on any Green Belt land also unjustified. It is proposed that Walton/ Moore would triple in size and

would entail the removal of part of Moore Nature Reserve, again removing valued GB land.

It is stipulated 20-30% of new homes should be affordable according to government guidelines and this is welcome to assist folk onto the housing ladder. But increasing higher than average house prices in S Warrington would in fact still make it difficult for families for affordable house purchase, further encouraging the local uncontrolled rental market. In increasing the GS area with 5,000 more houses with infrastructure timing/phasing uncertainty residents have serious concerns that the Council could be repeating the Chapelford experience:-

APPENDIX- The Chapelford Urban Village (ChUV) Experience

One of our concerns as residents of an expanding GS resident community is that the new Garden Suburb (GS) proposed in the Council's LP replicates the Chapelford (Ch) experience turning our rural villages into isolated urban villages. Encroaching on so much green space, the SWarrington GS Urban Extension could turn into a series of isolated urban villages or at worst one large connected urban sprawl area.

Background: ChUV- Location NW Warrington situated on a 200 acre former RAF Burtonwood site. Closed in 1993 but planning permission in 2002 since when there have been 15 phases of building. First homes were sold in 2004 and the last one completed in 2017. Currently ChUV comprises approx 2000 homes. Concerns:-

- Much of the infrastructure was not fully planned until the middle of period of construction, leaving a lack of services and transport.
- The new rail station, and limited amenities such as a supermarket, a few retail shops, doctors surgery, a primary school all had serious delays and some have still not been delivered (doctors) causing residents much distress. All are surrounded by car-based suburban developments accessed by large roundabouts and wide roads inc dual carriageways.
- On entering ChUV the amount of land dedicated to excessive car parking is immediately apparent.
- Despite much promotional documentation during planning and home delivery about the merits and promises of walking and cycle links on new pathways, and improved bus service links (CHUV is only 3km from Warrington town centre), urbanization in ChUV has meant villagers retaining heavy reliance on car transport. Due to misuse and neglect, these pedestrian and over-designed cycle routes have fallen into disrepair and have become even more unappealing. And some days the last bus is only 18:30

Poor community amenities and services have made ChUV almost an urban ghetto and we GS residents fear our area could endure a similar outcome but on a much larger scale, especially being even further from Warrington town centre.

5 Green Belt (GB):

We fail to see any justification for the release of GB for housing and commercial developments as the benefits do NOT outweigh the harm and we would contend there do not exist "very special circumstances' for encroaching on any GB.

Has there been sufficient attention and analysis of potential GB release across the Borough (not just S Warrington) as a whole and even neighbouring boroughs and does this highlight an alternative opportunity for identifying more acceptable brownfield development targets currently and even those available in future? There is NO acceptable case for GB release. Apparently 95% of the GB required comes from S Warrington due to constraints elsewhere in the Borough.

In short, we object strongly to any GB release for many reasons- health (converting green space into a polluting commercial zone), destruction of landscape and character, and environmental (destruction of wildlife corridors). We believe that there is a flawed GB appraisal with the Council failing to show whether they have investigated alternatives and wider benefit as per meeting updated NPPF (2018) guidelines. In particular, we are not convinced whether WBC has looked fully at all other options including possible use of suitable brownfield sites and underutilized lower grade land. Also have discussions taken place with neighbouring authorities whether they could accommodate the identified need for development, as demonstrated through the statement of common ground?

Regarding national policy, NPPF notes:

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

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- 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;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

We refer WBC planners to a letter from our MP Mr Faisal Rashid to Chief Exec Prof S. Broomhead (May 2019) in which he makes a most powerful case for not allowing any GB land to be developed. " I am concerned that the release of this land (application 2019/34739- Stobart National Hub) could set a worrying precedent for the future of other areas of our protected green space, opening the floodgates for further changes to our town's Green Belt policy". He goes on to comment "I would also like to make it known that I object in the strongest terms to planning application 2019/34799 (Six56, Langtree)."

(NOTE: Both applicants assume wrongly that their recent submitted May development proposals are informed by this new LP-PSV which is not yet in place and therefore we contend their status is one of prematurity.)

In this letter he goes on to cite NPPF guidelines and CPRE sources. NPPF states

'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the GB. 'Very special circumstances' will not exist unless the potential harm to the GB by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations'. Planning guidance also makes clear 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt'.

Overall, like Mr Rashid, we believe most of the existing GB in S Warrington part of rural Cheshire is precious and should be preserved at all costs. It is wholly agriculturally functional and is a prized economic and environmental asset. Furthermore it is an essential counterbalance to the considerable pollution from the nearby M6 and M56 motorway network but also valued for the preservation of important local wildlife corridors. Moreover the proposal contained in the latest transport plan, LTP4 for a possible new strategic link/distributor road with sections of dual carriageway linking the exceptionally busy A49, junction 10 of the M56 to the equally busy A50, junction 20 of the M6 crossing prized green rural landscape around Stretton, A Th, through Pewterspear to Dipping Brook, on to Grappenhall would not just destroy GB and other green space but would exacerbate a serious pollution health hazard for many local residents and therefore would be quite unacceptable. This would be further worsened when local motorways are congested and even gridlocked as happens from time to time, as this distributor road might be seen by road users to provide an alternative traffic release route.

6 LTP4- The Transport Plan

We have sent a separate LTP4 representation to WBC and the Government Inspectorate. This transport plan has been studied in depth and we conclude that it is largely unreliable and too ambitious to be recognized as sound and deliverable.

SUMMARY

As presented at the May/ June public consultation, LTP4 is mostly speculative and unsound since in many cases the Council has failed to demonstrate realistic and workable transport network schemes. Important parts of the LTP4 Plan are frequently described as 'illustrative' or 'conceptual' ie it is an outline of ideas with limited detail provided. Frequently there is an absence of information about robust funding mechanisms to deliver the plan. It therefore lacks the substance to merit being considered as an important support and foundation to the PSV Local Plan. Indeed this transport plan undermines many of the more promising soundness qualities of the Local Plan itself.

7 Garden Suburb (GS) and South West Urban Extension (SWUE) :

Much of our concerns for these 2 S Warrington areas are concerned with transport and therefore covered in our LTP4 submission.

Overall, the proposed scale of both GS and SWUE developments is unacceptably massive converting existing S Warrington rural villages into urban sprawl with dependence on uncertain infrastructure plans and funding. The character and distinctiveness of the whole of the South Warrington area would be dramatically changed in perpetua. We fear a nihilistic urban future for our residents similar to those in ChUV (see Appendix in section 4). The plan makes much of the scope for its policies to secure protection of existing area character and distinctiveness and interestingly to enhance those features. As much green space would be lost for such high density developments, we strongly disagree and would welcome an explanation from the Borough planners. Of course we accept that some development will have to take place but we believe there are better and less harmful ways of achieving this.

Some of the road schemes might seem attainable (eg the Western Link, if all budgeted costs are indeed fully covered) but highway engineers we have consulted have stated that costing estimates for this bridge's are significantly underestimated due to the high spec required to make it robust and safe. This and other trans-waterway schemes are therefore unrealistic due to poor information on technical detail and uncertainties in funding. Consequently they are unsound. Re measures to improve funding guarantees, details should be sought and made clear about government and developer CIL cost contributions as part of the justification of any proposed new development scheme.

The proposals for the Garden Suburb in particular are of critical concern to residents in our village of Appleton Thorn. Our immediate vicinity is targeted to host many unwanted development proposals including in the near future massive commercial developments; If the GS plan impacting A Th is delivered, there will be extensive environmental harm to rural landscape and valued heritage assets in our area. Local high density housing and large commercial developments mean significant increases in traffic with associated increased stress on roads viz existing roads (A49, A50, B5356), and motorway networks will become even more unmanageable during peak periods giving more frequent and longer instances of motorway traffic gridlock. A Th will therefore be in the vanguard of all this with unacceptable pollution from emission particulates, NOX, CO2 all a most worrying serious health hazard for all villagers notwithstanding their deleterious contribution to greenhouse gases negatively impacting our environment. Local councillors have recently unearthed WHO air quality data (presented in our LTP4 submission) which shows Warrington already to have one of the most serious pollution problems in the country so surely WBC must take heed and take steps to mitigate this problem rather than accentuate it by granting Stobart and Langtree permission to develop their environmentally damaging Logistics and HGV transport business in the vulnerable south of our town.

8 2017 Thorn Ward Neighbourhood Development Plan (NDP):

The Localism Act of 2011 provided local communities with the opportunity to have a strong say in their future by preparing Neighbourhood Plans which would contain policies relating to the development and use of land. Over a period of some 3 years the Thorn Ward NDP, Warrington's first and only accepted NDP, was produced by a joint Appleton Parish Council and Appleton Thorn residents committee with the help of the WBC Planning team. This was accepted as a legal document in 2017 after external examination. Many of the policies were concerned about preserving the local character, heritage of the area and its valuable green spaces especially Green Belt land in and around Appleton Thorn. There would be major unacceptable and illegal encroachment on our Green Belt land on the eastern side of our rural village if large commercial proposals from developers are permitted. Permission to develop large commercial premises are currently being sought in 2019 from Langtree and Stobart. And if granted by WBC, then the floodgates would be open to other commercial proposals from other developers resulting in massive commercial sprawl. Thus the new LP-PSV as proposed attempts to fundamentally undermine residents' preferred environment. In particular there are some infringements to the spirit of the NDP and its 2017 policies:

AT-D1 Design of Development Of Appleton Parish Thorn Ward- in conflict with this policy, the LP-PSV would destroy local identity, sense of place, and village character

AT-D2 Protecting local landscape character and views- contrary to this policy, the proposed massive commercial area on the eastern side of our village destroys village character and green space including local habitats and wildlife corridors

AT-TH1 Management and Transport – significant increase in commercial traffic is a large concern

AT-E1 Employment- brownfield sites are not prioritized but a large loss of greenspace and Green Belt is proposed; there will be an unacceptable impact from excessive traffic

AT-CF1 to the contrary, green spaces are NOT protected!

The NDP team is being urged by the Council Planners to engage with them again on revising our NDP wrt the proposed policies in the emerging new Local Plan. Firstly we have some questions of concern:-

- Why should the NDP team spend many more hours (in a protracted NDP process with many meetings required with councillors, planners, and the community) in attempting to redraft another updated NDP, only for the new policies to be ignored like the first NDP ?
- Should we be spending our valuable time working through our preferences for the PSV/ LP to be included in the final plan rather than spending time highlighting important issues as part of a revised NDP hoping they would be included in the final new Local Plan?

Granting developers permission to build extensive commercial premises on GB land would wipe out the Neighbourhood Plan as a robust meaningful policy document and undermine trust in the whole Neighbourhood Plan system. As the NPPF states ‘the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits’ and ‘plans should be “the key to delivering sustainable development that reflects the vision and aspirations of local communities”. Indeed our Thorn Ward NDP team welcomes the 2018 Parliamentary Bill proposed by MP for Henley Mr John Howell which seeks to strengthen the power of NDPs. On Dec 4th 2018 he used the 10 minute rule in Parliament to propose a new NDP Bill

“I am introducing this Bill to try to provide reassurance to communities who spend considerable amounts of time and money producing a neighbourhood plan that their work is valued, that it plays an important part in the planning system and the determination of planning applications, and that, together with the local plan produced by the district or borough council, it is a fundamental document. The neighbourhood plan becomes part of the local development plan when it is approved at a referendum and thereby carries the full legal weight that the local plan does.”

9 CONCLUSION

There are many aspects of the Local Plan LP-PSV which give rise to significant concern. Fundamentally there is no adequate justification for strong predicted economic growth leading to a significant need for release of housing, employment, and green belt land. Concerns about impacts on local area character and distinctiveness, environmental damage and air quality pollution have been highlighted. The LTP4 transport plan is mostly flawed as it lacks the necessary robust detail to be confident about much success in most proposed travel schemes. Some proposed futuristic mass transport schemes are somewhat ambitious but unrealistic for widespread adoption.

Residents in the proposed Garden Suburb area in S Warrington are acutely sensitive to the negative impact of overdevelopment in their area with the likelihood of more traffic congestion and pollution around their rural villages. They fear it may be turned into a large urban extension, impersonal and isolated from the rest of Warrington. Residents in Wythenshawe, Mcr were originally sold by their local Council on the idea of garden villages\ Garden suburb, only to be disappointed years later to be recognized as the largest urban sprawl area in Europe.

Overall, since there has been little provision of good reliable data and adequate detail to be confident about delivering the Council’s new Local Plan vision via this LP-PSV, then it becomes apparent that the LP-PSV would lack the necessary soundness to be trusted, supported, and adopted by the citizens of Warrington. As the timely provision of new homes and businesses are important for Warrington’s future, we would urge the Council to have a major rethink on its LP development strategy

soonest. As it stands, many of the LP-PSV proposals and policies are unjustified making both the LP-PSV and LTP4 unsound.

Finally we would ask you to please give our representation due consideration. This includes having the opportunity to participate in follow -up hearing sessions with the Examination Inspectorate. In the meantime, you can contact me should you require further information or clarification about the issues that have been raised.

Yours sincerely,

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