

From: [REDACTED]
To: [Local Plan](#)
Subject: Objection to six56 proposed plan
Date: 04 June 2019 20:53:55

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I am writing to object to the appeal made by Eddie Stobart for their planned Greenbelt development. [REDACTED]
[REDACTED], I will be living close to the development of this site and the adjacent proposed Six 56 logistics park.

Their original planning application was properly and diligently considered by Warrington Borough Council and equally properly refused, as not meeting any of the Special Requirements that might be deemed exceptional circumstances for release of Green Belt. The wider site has been identified as possible employment land in the latest draft Local Plan. However this plan has yet to be subject to a completed public consultation or independent Government planning inspection. Given the significant number (4,500) and substantial objections to the preferred development options published in 2017, it is by no means certain that this wider land bank will be repurposed from its existing agricultural use, particularly given the national and international focus on climate change, environmental protection and food provenance/miles.

As the National Planning Policy Framework makes clear:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

It is not clear that Warrington Borough Council has undertaken any of these steps in proposing any Green Belt development that would have given the applicant reason to believe its application could be supported. Even absent an approved and adopted local plan, NPPF confirms:

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

As none of these exceptions appear to fit the application, it was and remains absolutely correct for Warrington Borough Council to refuse the application.

The business case for the wider employment area development has been weakened from manufacturing and the associated skilled jobs to logistics, an increasingly automated sector with inefficient land density use and necessarily high traffic requirements. The adjacent roads to this development are substantially "country lanes", often only a single unmarked and unlit carriageway with no pedestrian walkways. Any development requires material infrastructure development for which the Borough Council has no funding and it would be uneconomic for any one development to finance. Consequently, there is a material risk that this development would proceed on only the vague promise of a future contribution that never materialises. Moreover, the justification for logistics is the increased volume of online sales - if so, this will lead to the continuing decimation of not only the high street but also the retail parks in and around Warrington that already suffer many vacant units. This would suggest these units could be easily (and will need to be) repurposed as part of a justified brownfield investment programme.

The special case for employment made by the applicant is based on the relocation of other existing jobs from other sites so are not "new jobs" and thus there is no net economic benefit. I understand that Stobart employs a high proportion of temporary contract staff who share neither the advertised pay rates and conditions nor the long term job security of direct employment. Hence any marginal benefit, if it existed, is not necessarily sustainable, particularly in the expected economic downturn. Indeed there are a number of vacant industrial units already close to the site. As automatic driving technology improves and alternatives to long-haul distribution are sought, this can only be negative for employment prospects.

This development is going to cause a huge increase in traffic congestion and pollution and so a great personal inconvenience as well as risk to my children's health. Warrington already suffers one of the worst air quality assessments, by their own analysis leading to 145 premature deaths a year, and this development is just making a bad situation worse - how many more unnecessary deaths (from either pollution or, equally likely, vehicle manslaughter) would the applicant like to take responsibility for?

Although there is a promise of a road improvement leading to the motorway junction, it is the junction that will cause the congestion not the road leading to it. The Stobarts/Six 56 development needs a new and dedicated motorway access to the rear on to the M56 - I do not believe the Highways England have scheduled or budgeted for such an access and any consideration has been stalled in the same way that the Government has not yet actually funded the Warrington Western Link (nor does Warrington have a readily available source of funds to finance their required contribution, not least of which the absence of signed off unqualified accounts will prejudice any additional borrowing facilities). The existing motorway junction 20 of the M6 and M56 is already congested and would need to be modified and expanded for increased traffic volumes else the economic cost of lost working time for all users of that junction, not just the applicant, far exceeds any suggested benefit. Moreover, (the all too frequent) high winds that lead to a periodic ban of lorries over the Thelwall Viaduct to the immediate north of the junction, mean that the applicant's vehicles will be trapped unless alternative exit routes are built. I would reiterate that the Council does not have the funding for this, nor does the applicant nor, it would appear, central Government. Only recently, the Council Leader expressed a view that it would be "tragic" for communities if any new roads were built primarily for the benefit of HGV drivers using them as a "rat run".

The impact of 24 hour HGV movements, multiple staff shift changes from commuters (there is no local affordable housing or public transport) and, for example, the introduction of high level light pollution will have a big environmental impact on this Green Belt. The 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;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- 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;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking

into account relevant information such as river basin management plans; and
f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

This development borders some very beautiful countryside and risks being the proverbial “thin end of the wedge” that destroys it and all the biodiversity it supports.

It is worth noting that there is an existing agreed Neighbourhood Plan for Appleton Thorn that covers this site. In that plan, agreed with Warrington Council, this land is still designated Green Belt; granting permission would wipe out that Neighbourhood Plan as a meaningful policy and undermine trust in the whole Neighbourhood Plan system. As the National Planning Policy Framework states "the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits."

Thank you for considering my representation and I hope you will uphold the original decision of the Borough Council, supported by its electorate, to refuse the application

Regards

Beryl Roberts