

# Response 386

## Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

## PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: Paul Bennett

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

	Contact details
Organisation name (if applicable)	[REDACTED]
Agent name (if applicable)	[REDACTED]
Address 1	[REDACTED]
Address 2	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

None of the above

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant		X
Sound		X
Compliant with the Duty to Co-operate		X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

The Warrington Local Plan is fundamentally flawed and is not a sound plan based on the following reasons:-

The Town Centre of Warrington is currently a disgrace with many empty and derelict buildings and brownfield sites. The Plan for the centre including building affordable housing is commended. But the developers are unlikely to redevelop this area first as the commercial returns are unfavourable.

**Destruction of Greenbelt**

There are no "exceptional circumstances" that justify building on this prime green belt area of South Warrington. The Greenbelt boundaries were only confirmed 5 years ago so what has dramatically changed?

Building of this centre on Greenbelt land would not safeguard the countryside from encroachment.

If building were to proceed it would change this beautiful landscape forever and for what benefit? Not for the local people who's lives will be blighted by this.

The area is full of beautiful villages with plenty of green open spaces and walking paths, but if what the council is proposing comes off, we will lose our local identity

WBC Landscape character Assessment 2007 stated that the character of Stretton and Hatton and Appleton Thorn was undulating enclosed farmland..... these character areas will need to be respected - so why is the Council now ignoring this assessment.

This plan has been dictated by the wishes of the developers (both housing and commercial) rather than building on the infrastructure strengths and transformation of existing, or future (eg Fidlers Ferry Power Station site) brown sites to enhance the image of the town.

**Housing Assessment**

Labour's plan is to build in excess of 900 homes per year, yet Warrington has never exceeded 500. How can that be a realistic assessment?

These are unprecedented levels of growth and the levels of delivery incompatible with anything previously achieved.

The Plan provides no justification why these areas identified for housing and employment are better than other areas in the area.

**Employment**

The identification and assessment of an employment area adjacent M6/56 (including Stobarts and Six56) is not evidenced and its comparative evaluation against other potential areas is not justified or proven. This area is not close to other key infrastructure namely railways; there is already identified distribution areas at Omega which are as yet not fully utilised, and there is ample opportunity to expand the Omega site if demand requires.

Indeed Distribution Centres are a relatively new phenomenon and whilst Warrington's Omega site was leading many other regional centres are emerging resulting in stiff commercial competition which will lead to obsolescence of existing developments.

The Plan is Driven by economic needs of existing operators and landowners and not by sound planning

There are already large areas of vacant commercial property in the region that can accommodate this proposed development.

Building of these distribution centres rather than using derelict or other urban land e.g. the airfield is contrary to the purpose having Greenbelt.

Building this centre on Greenbelt land would destroy the setting and specialist character of this part of Warrington.

The type of employment being proposed by Stobarts had not been fully described so it is not clear what economic benefit they would bring to Warrington. Many of their existing workforce commute from areas other than Warrington, which increases congestion and decreases air-quality.

This development will result in additional vehicle movements of both staff and HGVs.

HGVs frequently use the smaller local roads. Stobarts HGVs drive down roads such Stretton Road and through local villages even though they are not supposed to impacting the local community causing noise disruption, air pollution and vibration damage to roads and other structures.

This site is also not close to where Warrington employment needs are. This site will not attract the number nor the high-quality jobs that are claimed. Workers will probably have to commute from outside the area further exacerbating the pressures on the road infrastructure.

#### Infrastructure

There is scant detail in the accompanying Transport Plan 4 which demonstrates how the vast scale of development in the Garden suburb can be serviced thereby avoiding serious deterioration for the existing communities.

The transport plan is speculative and unfunded and there is no details on phasing or pre-requisite works before any developments can proceed.

The infrastructure of Warrington and in particular South Warrington is already stressed to capacity and further development will result in serious pressures on roads, public transport, GPs & Warrington Hospital which is already under immense pressure.

The Draft Local Transport Plan 4 is contradictory in that it states "Neighbourhoods in Suburban Warrington will become even more attractive places to live than they are currently. Residents will benefit from improved air quality, less traffic and improved access to the town centre" but the increase in traffic from the Garden Suburb and the Six56/Stobarts Employment Area developments will:-

- Worsen air quality
- Increase traffic
- Destroy the character of South Warrington and make the area less attractive to live.

#### Road Infrastructure

Info from Transport appendices document indicates "40,000 additional car trips per day due to additional housing planned (this is work related trips and does not include leisure, school or business trips). This however doesn't take into account increased car trips to Warrington employment sites from those who don't live in the borough, or any non-work trips by new residents.

The employment area development is proposed to facilitate distribution access to the M56 and M6 motorways. Junctions 19-21 of the M6 and junction 9 of the M56 are already heavily congested, causing frequently daily standstill despite the opening of the new "smart" motorway.

Gridlock of the motorway network ripples into the trunk road network resulting in standing traffic on the A50 main joining road which links the Stobart development to the motorway.

This development of both distribution centres in the employment area, and vast housing development will further exacerbate this intolerable situation which results in traffic trying to "rat run" through the town to avoid the motorways creating heavy congestion and gridlock of the ship canal crossings and town centre roads.

If Port Warrington proceeds this will massively increase ship movements on the canal further exacerbating the traffic congestion at the pinch point swing bridge crossings of the Ship Canal.

Transport for the North (TfN) aims to secure investment for rail, recognising the already congested roads. Research by TfN shows quite frightening predictions for levels of congestion and pollution if we carry on as we are doing now.

The proposals TfN have submitted to Government show that funding for the Western Link and M6 J19 to 21 improvements are way down the list of Government transport funding priorities.

I have attached several Google traffic images which vividly illustrates the typical daily congestion (red/purple roads) of the road traffic network in the area. I have mapped this road congestion daily and hourly.

#### GPs & Hospitals

The GP Surgeries are under immense pressure. Non urgent appointments are not available between 2-4 weeks and emergency same day appointments are filled immediately booking becomes available.

#### Pollution

WARRINGTON has been named and shamed by the World Health Organisation for breaching air pollution safety levels. The town is one of 40 places in Britain and Ireland that has breached the WHO's safe levels PM2.5, which are particles of things like smoke, soot, dirt and dust found in the air.

WBC has said itself in its Air Quality Action Plan "we have estimated poor air quality causes approximately 145 premature deaths per year". A Warrington Councillor said "Warrington Borough Council takes its responsibility for the health and wellbeing of its residents extremely seriously. "We remain determined to tackle the causes of ill health in the borough and that includes air pollution – to this end we have a comprehensive network of sampling sites which form part of a national monitoring programme" Yet how can they support adding more HGVs, the most polluting sources!

Building on Greenbelt land will result in a loss of biodiversity.

#### Conflicts of Interest

WBC is conflicted in assessing this application as the proposal has been developed jointly with other Council bodies.

Warrington Councillors also hold roles/relationships with developers whose sole purpose is to exploit commercial interests at the expense of the environment, communities and local residents.

WBC has not liaised with adjoining local authorities to develop a strategic plan for growth in the NW Region.

The benefits claimed for these proposed developments both housing and employment do not justify the loss of this prime greenbelt and the destruction of the very character of this part of Warrington which makes Warrington an attractive place to live.



6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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## **Warrington Borough Council Objection to the Draft Local Plan**

### **DRAFT work in progress**

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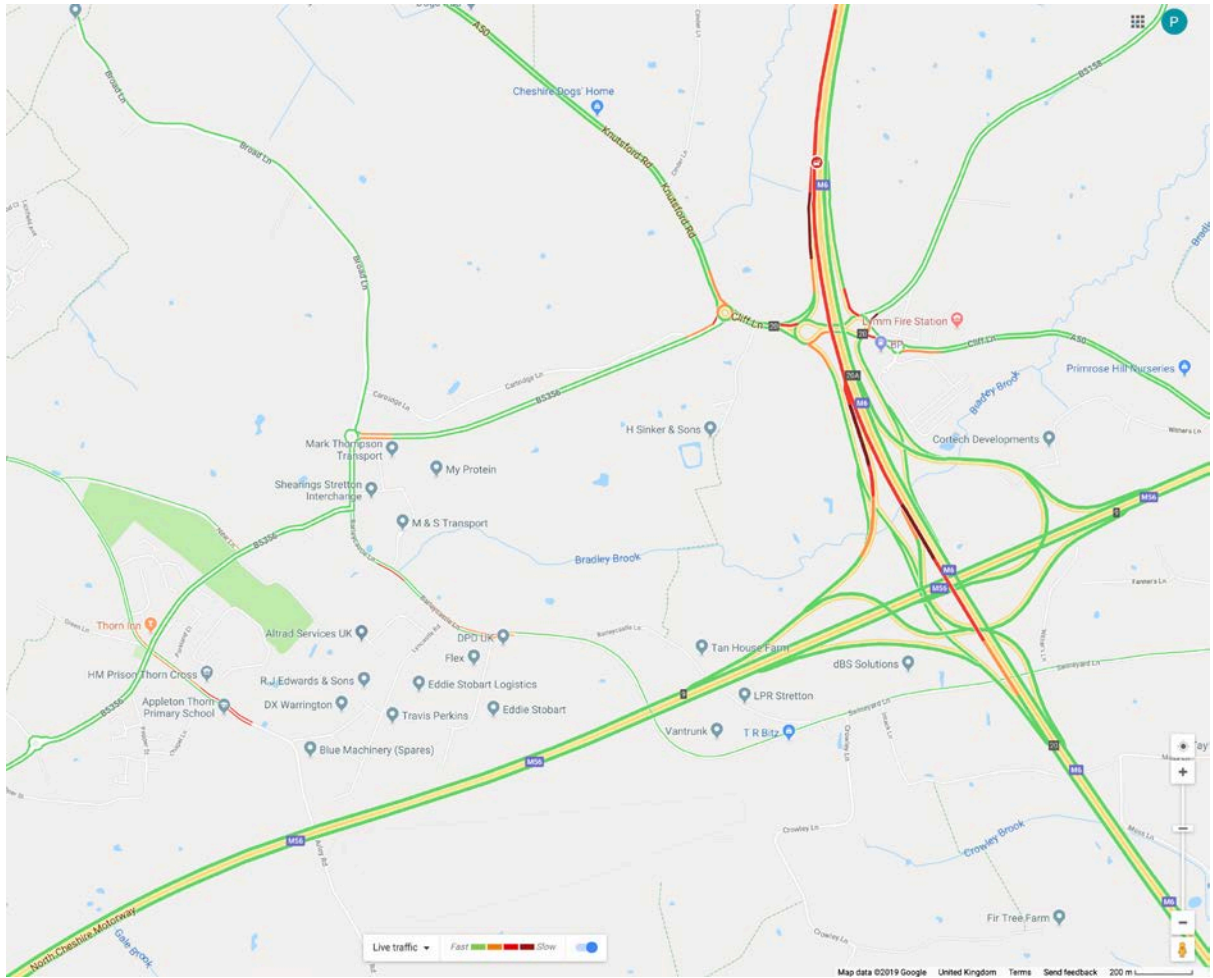
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Paul Bennett





*Typical daily traffic congestion on the Warrington Area road network*



*Typical road congestion in the Stobart Area and links to the Motorway network*