



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

12 June 2019

Dear Sirs

Warrington Local Plan

It is my strongly held opinion that the Local Plan is unsound, unjustified and not fit for purpose, particularly in respect of the ill conceived proposed 'Garden Suburb' and the impact upon South Warrington. As someone who lives in the very centre of the proposed development, I believe this will have a catastrophic effect on South Warrington.

My thoughts are as detailed below:

Greenbelt

- Disproportionate impact on South Warrington – some 80% of greenbelt destroyed (600 acres).
- 10% of greenbelt being released across the borough in one go is too much.
- There is massive local opposition to the Local Plan which has received an overwhelmingly negative response.
- There is no genuine justification for the release of land from the Greenbelt.
- Green belt release should only be contemplated when all other options have been exhausted.
- Assurances need to be given that brownfield land will be built on first rather than offering Greenbelt land to developers in an unjustified and unnecessary landgrab. This is a plan based on the desires of developers – not genuine need.
- The excuse is given that the brownfield sites cannot be delivered in the first 5 years of the plan as the infrastructure is not in place. There is no infrastructure in place in the green belt in South Warrington, so surely that land also cannot be delivered at this time?
- Releasing the land from Greenbelt will lead to a free for all where nothing is protected.
- Gigantic logistics hubs will have a massively negative impact on surrounding areas.
- The Local Plan does not demonstrate the 'exceptional circumstances' for release of land from the greenbelt.
- Low quality logistics jobs in low numbers are proposed together with commuter homes which could be accommodated elsewhere. This does not constitute exceptional circumstances by any metric.
- There is an opportunity for WBC to redevelop and regenerate deprived areas and redundant land through investment whilst retaining the precious green belt resource – this is being ignored.

Housing need

- WBC's account of required house numbers is widely disputed.
- The numbers are not supported by government figures and are in fact well in excess.
- Houses in the 'Garden Suburb' will not be affordable and certainly will not be bought by local workers at the planned logistics hubs.

- There is no evidence that there is a shortage of available house for sale in Warrington compared to demand. The shortage, if any, is of social and affordable housing. This will not be solved by the building of the 'Garden Suburb' which will comprise executive homes priced well above the local and regional average.
- If 2016 projections are used rather than 2014 as the 'standard methodology' and growth is not included, then the 'Garden Suburb' will not be required and no green belt release will be needed.
- We are in a period of great uncertainty as to the economy, population growth, technological advances, an environmental/ climate emergency and the implications of Brexit – setting a 20 year strategy at this point is wholly ill advised.
- Economic growth in Warrington is not a certainty and will not be achieved through building unmanned logistics hubs and houses for commuters to neighbouring cities (Manchester and Liverpool). Warrington does not offer higher paid, higher skilled jobs – this should be an area of focus for WBC.
- This is a developer led Plan with South Warrington green belt and communities being held out as a sacrifice.

Job creation

- Proposed employment land is not backed by any meaningful economic strategy for Warrington.
- Low quality jobs with obsolescence inevitable and impending are all that is contemplated in the Local Plan.
- There is a lack of vision, ambition and imagination; surely the people of Warrington deserve better than just to be offered minimum wage/ zero hours jobs in appalling conditions in warehouses?
- The proposed employers (specifically Stobarts) are suffering declining financial performance and are considered extremely poor employers by the Unions and others – why are WBC backing them?
- Estimates of job numbers are inflated; logistics is even now being increasingly automated.
- Most inhabitants of the new houses will be working in Manchester and Liverpool – not Warrington.

Sustainability and environment

- This Plan will have a catastrophic impact on the environment through the location, scale and type of the development intended.
- We are experiencing a 'climate emergency' and yet WBC's response is to propose the destruction of huge swathes of green space.
- This land is important for biodiversity – if the farmland is built on, where does Mr Bowdon suppose the many bird, mammal and insect species will go?
- Many species that will be decimated are protected or red listed (e.g. great crested newts and bats); I have not seen any proposals for their protection in the Local Plan
- It would appear that no meaningful environmental impact assessment has been carried out.
- The impact of 1000s of cars on air quality will be hugely harmful.
- There is no public transport provision in the Local Plan – no rail or tram links are contemplated or in fact possible in South Warrington.
- Warrington has some of the worst air quality in the country – there is no strategy to address this, only to worsen the situation.

Traffic impact and infrastructure

- The huge negative impact of HGVs on the local and already inadequate road network is not considered in the Local Plan.
- 1000s more cars on the roads are inevitable as the Plan is entirely dependent upon the car.
- There are no train stations in South Warrington, and therefore no alternative mode of transport to the car.
- The Plan contains no clarity on infrastructure – i.e. what is proposed, what it will cost, how it will be funded, when and how it will be provided.

- The Local Plan suggests that when adopted, transport plans will be looked at. Surely this should be the starting point before any large scale development is even contemplated?
- WBC has a history of catastrophic decisions and inaction in respect of infrastructure. This will be no different.
- There does not appear to be any detail around crossings across the canals/ Mersey. There are currently issues with swing bridges – how are the 1000s of further occupants of the new houses to get into Warrington.
- ‘Suggested’ roads in Local Plan will merely recirculate traffic within an increasingly congested area – there is no provision for how traffic will be enabled to access Warrington or the motorway junctions.
- The South Warrington area is confined by a number of ‘natural’ boundaries: the M56, M6, the Ship Canal and the Mersey. The Local Plan contains no provision for facilitating exit points for the massively increased traffic within these boundaries.
- There is no traffic mitigation strategy.
- No realistic traffic assessments have been undertaken.
- There is no assessment of the impact on local amenities, e.g. schools, GPs, hospitals; these are already overloaded.

Town centre

- Warrington town centre appears to be in decline. There appears to be no plan to regenerate the town centre. (This is a WBC policy objective).
- Available brownfield sites should be prioritised and green belt only considered when brownfield is exhausted – not the other way round.

Character and identity

- It appears that the only ‘towns’ considered in the Greenbelt report commissioned by WBC are Warrington itself and Lymm. This has enabled WBC to classify the Greenbelt in South Warrington as making a ‘poor’ contribution in certain respects.
- This completely ignores villages including Grappenhall, Appleton, Thelwall and others and their special character and history, of which their semi-rural setting is a key element.
- The character, history and identity of the villages in South Warrington will be completely destroyed as they are subsumed into bland housing estates by unchecked sprawl.
- The villages will be reduced to nothing more than a single ‘Disneyfied’ street consisting of a pub and a church surrounded by bland anonymous housing with all historic and geographic context lost.
- The distinctiveness of Warrington and the character of its villages, communities and neighbourhoods will be destroyed by this Plan.
- Recently built housing estates (e.g. in Appleton Thorn) are ugly, out of scale and do not in any way reflect or respect the vernacular architecture of the areas.
- There is no provision of community facilities, just huge developments which necessitate increased car usage.

Consultation

- The initial consultation on the PDO in 2017 was not a genuine process. The views of the c.4,500 objections received to the ‘Garden Suburb’ have been entirely disregarded.
- Having had the opportunity to speak to a WBC planning officer at one of the consultation events, he admitted that nothing had changed in respect of the Garden Suburb as a result of the responses, even though the majority of them were vehemently opposed to it.
- This does not represent a democratic process, rather the imposition of a Plan that is not wanted by the residents of Warrington.
- Mr Bowden admitted in the forum at Grappenhall Cricket Club that WBC had made mistakes in the past. This catastrophic plan will be his legacy.
- The Plan is not joined up with neighbouring boroughs and should be looked at across the wider region.

Test of soundness

- The consultation process not properly followed as responses from the impacted communities to the PDO have been ignored.
- The Plan does not demonstrate sustainability. It will have a deleterious impact on air quality, the natural environment, cause massively increased traffic and hence congestion on the road network. There is no mitigation and no provision for public transport.
- The Plan is not justified. The Garden Suburb is not required without WBC's inflated assessment of housing numbers. The reasonable alternatives (brownfield first, the alternative housing number/ growth computations) have been disregarded. Evidence as to environmental impact, traffic, air quality etc has not been considered.
- The calculations of the growth in jobs generated which drives the estimates of the number of houses required (plus an uplift!) are erroneous and exaggerated and hence the Plan is unsound.
- The plan period of 20 years is unrealistic; it is at this point impossible to anticipate housing and employment needs for more than 5 years ahead.
- The Plan is inconsistent with national policy on sustainable development, the 'climate emergency' and the preservation of the green belt.
- The Plan does not adequately deal with the regeneration of Warrington town centre and arrears in need of investment and development. There are huge out of town retail parks in decline which also need to be addressed.
- There is no detail on how the infrastructure will be delivered – this cannot be left until after the logistics hubs and 1000s of houses are built.
- The Plan does not appear to be deliverable. Detail is flimsy at best with little detail and delivery of infrastructure seems to be entirely dependent upon the whims of the developers carving up the green belt. No public money is proposed to be available for infrastructure.
- There is no case made for release of land from green belt before brown field land has been developed. The Plan does not meet the criteria for release from green belt:
 - To check the unrestricted sprawl of large built up areas
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land
 - To prevent neighbouring towns merging into each other

I can see no alternative but that the Local Plan is abandoned with immediate effect.

Yours faithfully

Alex Collier