

Warrington Local Plan Consultation

My response:

On P189/190/191 ENV7 is woefully inadequate. 10% from renewables is wholly inappropriate over a near 20-year plan. That means 90% is 'OK' to come from fossil fuels. The ENV7 standard needs urgent updating to CARBON NEUTRAL. Clause 3 talks about 'minimising' emissions. What does that mean, a token gesture? I know that Central Government scrapped modifications to Building Regs which partially addressed this situation, but it is no excuse for Warrington having no ambition on Climate Change. WBC should be signed up to the CEE Bill.

I have noted developers are allowed to put 2/3 solar panels on their roofs (if they do at all). This is a mere marketing ploy for buyers who do not know that a useful system has 10 or so panels. The closer the system can produce to the single-phase electrical connection limit of 3.68Kw the better. No developers of new Warrington homes should be allowed to get away with sub-standard solar installations.

Nor should any new homes have gas boilers fitted, as conversion to a heat pump at a later stage will involve changing a lot of pipework and radiators and is very expensive. Air or ground source heat pumps with matched heat emitters should be fitted from new.

The word 'sustainable' is used as a buzzword throughout. It has no meaning or context.

I would like to know what the housing need of Warrington is (3.4.7). How many homeless people are there? How many adults are living in their parent's houses because they can't afford to move? How many people are on waiting lists? What is the incidence of families in overcrowded dwellings? How many moving into the town are expected? These figures if included in the plan may give an indication to how many houses are actually needed, as opposed to a desire for growth. Growth is not a meaningful goal, quality of life is.

The last two years have seen immense reductions in requirements for offices and retail space. * No Green Belt release is justified until all the opportunities for brownfield site redevelopment and building conversions have taken place. This plan (and development pre-empting the plan) is advocating building on the Green Belt as early as 2022.

At clause 2.1.5/7/8 it is stated that car travel dominates. There is nothing going to prevent this from any new houses or address the dire situation at the current time. Building over 4,000 houses on the South East Urban Extension will lead to 10,000 more cars, let alone the other impacts which I will come to.

To put the SEUE in context, it is roughly the same number of dwellings as Grappenhall and Thelwall at the present time put together.

At 3.3.10 there is a statement of intent for infrastructure and transport which must be adhered to.

3.3.12 Thelwall Heys is seen as an early win 'without material impact on the [functioning]? Of the Green Belt. I go back to the * marked above. And building 300+ houses will have an impact on Green Belt. It is also stated on page 239 that the people who live there will be able to use a bus on Knutsford Rd or Stockport Rd. a) it is a

very long walk for anyone not too good at walking, and b) buses on Knutsford Rd are very infrequent, Stockport Rd's bus service was stopped some years ago.

- 3.3.23 There is an intention the increase office supply in the Town Centre where have you been for the last 2 years?
- 3.3.23/24 '6/56 meets a large proportion of B8 requirements' What are those requirements? In fact 6/56 will take up a huge amount of Green Belt and is intended as a logistics site. Logistics means more lorries and van traffic by a very busy motorway junction, which spills over onto South Warrington roads regularly. It will provide few jobs. It is not needed at all there are huge sites already empty on neighbouring Appleton Thorn and other sites around Warrington.
- 3.3.27/8 There should be no more retail park needs, due to more online selling. Office and retail building should be converted to homes or other employment.
- At 3.3.31 there is a recognition that homes will come before infrastructure when it should be the other way round, and there is no definition of 'extensive new' infrastructure that is referred to.
- 3.4.1 Exceptional circumstances must exist for release of Green Belt. There is no proof the situation is exceptional.
- 3.4.3 How often are brownfield sites re-assessed, as the picture must change frequently?

Policy DEV2 – 'Affordable' housing. Another buzzword which is almost always watered down or ignored in what is delivered after it has got planning approval. Statements 2/3 seem arbitrary and plucked out of the air. Clauses 8/9 are the get out clauses.

- 4.1.53/4 The need for affordable is demonstrated.
- 4.1.60 It is stated the need for older people will grow 50% and 1000 extra care home beds will be required (against the backdrop of current under performance)

P76 Employment needs – warehousing and distribution. a) Appleton Stretton top of the list but where will the workforce come from? No release of 137ha should be sanctioned when there is empty space at plenty of existing sites.

Section 5 says 5% of Green Belt being released, but how much is it if 'Insets and settlements' are included? The term 'washed over' is used from 5.1.20 onwards what exactly does that mean? (probably people's concern about Green Belt destruction)

Section 6 town centre. There should be conversion of vacant retail and offices before any new build.

Section 7 transport. No firm proposals.

Section 9. Warrington should not authorise any more coal/gas/petroleum activity and should seek to end existing extractions.

ENV8 Air quality will deteriorate with this plan, not improve.

- 10.27 Talks only of roads and does not address the ship canal crossings which will be generated nor is the impact on Grappenhall, Thelwall, Stockton Heath etc.
- 10.2.13 gives the impression that there will be a chance to influence infrastructure prior to homes being constructed in 2025. Then why is Urban Splash at Grappenhall Heys happening now?
- P215 27h connections across Bridgewater and Ship canals looks like a minor issue which will be forgotten. 37 uses the word 'should' when it must be 'must'

P202 Fiddlers Ferry is misleading everyone, the plan is to release 82ha of Green land. There is no mention of a clean-up of contaminated land either.

P237 (10.5) Thelwall Heys - 300+ homes worth removal of Green Belt. It is stated the development will be required to make a contribution to school places. Where will these be? Likely to involve a car journey.

At P245 it shows the huge scale of the SEWUE, twice the existing area and the loss of green land.

P261 10.9 Development at Pool Lane basically will make Statham an extension of urban Lymm.

P283 The glossary does not contain a definition of Green Belt or Greenfield, terms used throughout. I wonder why?

Brian Davies

