

From: [REDACTED]
To: [Local Plan](#)
Subject: Proposed Main Modifications to the Updated Proposed Submission Version Local Plan 2021-2038
Date: 16 April 2023 15:00:57
Attachments: [REDACTED]

[You don't often get email from [REDACTED]. Learn why this is important at [REDACTED]

Dear Sir/Madam

I should like to submit my representations on the above.

You will be aware that I objected to the earlier version of the proposed Local Plan (see attached copy of my letters of objection dated 11 June 2019 and 12 November 2021). I still consider that a lot of my comments on the earlier deposit version of the Plan remain pertinent for the Inspector to consider as part of the assessment of these latest modifications proposed and importantly the overall soundness of the Local Plan. I do not intend to repeat those comments here, rather I would again ask that these are included along with this message in any submission to the Inspector.

It is noted that the modifications propose removal of the South East Employment Area which is to be welcomed along with the retention of the Green Belt land in this local area. But the total amount of land proposed to be removed from the wider Green Belt is stated as some 390 ha which is still too much given that Warrington Borough has the highest concentration of derelict/contaminated land in the whole of England (see "i" newspaper article dated 7 February 2023) and which should be prioritised for development before even considering any future loss and development of any Green Belt.

I also see that the number of housing units required/proposed still represents a massive over-supply for the Borough and this certainly does not justify any further loss of Green Belt provision. This is especially so given that plans for the South East Employment Area have now been dropped. I seriously question the growth figures supporting the Council's proposals in this regard. It is my view that the overall housing figures within the Plan should be substantially reduced and any sites allocated for new housing should be re-considered with the preservation of greenfield sites taking priority in this task. Any greenfield sites allocated for housing in the deposit version of the Plan should as a consequence be removed from the re-submitted Plan and concentration be focused on bringing derelict/contaminated sites forward for housing (and/or future employment) purposes.

I trust you will direct my comments to the Inspector.

Regards
Christopher P Fox FRICS

[REDACTED]


Tel: 

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

11 June 2019

Dear Sir/Madam

WARRINGTON LOCAL PLAN CONSULTATION

I have lived in Warrington nearly all my life, some 50 years, and having worked for the Council in both the Planning and Estates Departments during and post the Warrington New Town era, I believe I am well qualified to comment on what is now being proposed under the Local Plan. Added to this, I have spent my career as a chartered surveyor working across the North west of England in the property investment and development sectors. I am a resident of Appleton, an area of the borough that has seen a large amount of redevelopment and loss of green space, with yet more development proposed, increasing traffic problems, ecological and environmental damage.

I would like to object to the Local Plan on the following basis:-

- The Plan period covered is for 2017 - 2037 instead of the normal 15 years. I see no need nor justification for this especially in a time of such economic uncertainty and changing legislation e.g. Brexit and government's focus on climate change which will undoubtedly impact upon future housing and employment requirements and, indeed, transportation.
- There is simply no justification for the predicted growth - it is far too ambitious and unrealistic for a town of this size and location. Past growth does not support the forecasts and will result in an oversupply of housing and employment land resulting in needless loss of green belt and providing a perfect opportunity for developers to "cherry pick" the most attractive sites for development.
- There is no need for the volume of housing and mass of employment land proposed. There is no housing crisis in Warrington yet the delivery proposed is over and above the government's targets - massively more than is needed or capable of delivery. The numbers used by the Council in preparing the Plan overstate the requirement for housing and do not therefore justify the loss of green belt. There is sufficient

employment land elsewhere in the borough to accommodate need and potentially expand the employment base without creating new areas which would be wholly dependent on road infrastructure and unlikely to be served by public transport links.

- There is no need nor proper justification for release of land from the green belt for development. The green belt was established to prevent urban sprawl. It provides strict boundaries to protect swathes of open countryside from development keeping land permanently open and can only be released in very special circumstances. The Local Plan proposals erode and damage these protected areas encouraging urban sprawl, impacting on ecology and threatening biodiversity. Any new development should be focused on brownfield sites and/or greenfield sites outside the green belt. The Local Plan does not prioritise development of existing brownfield sites as it should.
- The proposals will cause unnecessary harm to air quality and local ecology. The existing roads are already congested and this will only increase with more development adding to health risks and safety issues. The proposals contained in the Transport Plan do little to alleviate this.
- The proposals will destroy the unique character and distinctive nature of existing villages threatening their very integrity - the impact of the resultant urban sprawl.
- The existing poor and inadequate highway infrastructure is unlikely to be improved prior to development taking place and meanwhile the congestion and environmental damage will only get worse. Importantly, the Plan does not provide any basis to guarantee infrastructure provision ahead of development e.g. schools, doctor's surgeries/clinics, local shopping and public transport facilities.
- The Plan appears to take no cognisance to what is being proposed by neighbouring local authorities in particular Merseyside and Greater Manchester which will undoubtedly have an impact on the assumptions of the Council in assessing need for new housing and employment within the borough.
- Concentrating development in the south of Warrington will do nothing to promote the regeneration and/or renaissance of the town centre - it would simply encourage commuting to and from Manchester and Liverpool which flies in the face of climate change, air quality and zero-carbon commitments: the proposed 4 - lane highway from Stretton roundabout through Pewterspear to Dipping Brook and on to Grappenhall, if implemented, will encourage more commuter traffic and result in massive ecological damage and environmental impact: a loss of air quality and noise pollution.

For the above reasons I consider the Local Plan to be flawed and undeliverable - it is simply unsound.

Yours faithfully

Christopher P Fox FRICS

Tel: [REDACTED]

Local Plan
Planning Policy and Programmes
Warrington Borough Council
East Annexe
Town Hall
Sankey Street
Warrington
WA1 1UH

12 November 2021

Dear Sir/Madam

**CONSULTATION - WARRINGTON BOROUGH COUNCIL UPDATED PROSED
SUBMISSION VERSION LOCAL PLAN (2021)**

You will be aware that I objected to the earlier version of the proposed Local Plan (see attached copy of my letter of objection dated 11 June 2019). I consider that a lot of my comments on the earlier version remain pertinent for the examining Inspector to consider as part of the assessment of the soundness of the Local Plan and so I do not intend to repeat them in detail here, rather I would ask that these are also included along with this letter in any submission to the Inspector.

Whilst I appreciate there have been some revisions made to the earlier version of the Plan, there is little difference in the way it relates to the South Warrington area in that:

- It still includes a massive industrial development area at the M56/M6 junction primarily for logistics/warehousing which is wholly unsustainable on environmental and transport grounds
- There is still a major loss/development of Green Belt none of which simply cannot be properly justified - there is no justification for the scale of Green Belt release
- The housing numbers used in preparation of the Plan continue to be significantly above demonstrable need based on outdated growth forecasts - there is no justification for the predicted growth
- Insufficient emphasis and reliance is placed upon the development of brownfield land ignoring the government's recent initiative and funding to local authorities to promote active development of brownfield land
- The Plan still does nothing for the regeneration of the Town Centre
- The economic growth forecasts used as a basis of the Plan are still unjustified and unrealistic in that they still do not take account of development in the surrounding areas of Merseyside and Greater Manchester

Tel: [REDACTED]

- Future transport and infrastructure provisions in the Plan are woefully inadequate and lacking in terms of either detail and/or timing with no clarity on delivery, leaving the already congested transport network of South Warrington to cope with significantly increased demands
- Existing congestion and air quality and ecological concerns will be massively exacerbated for no good reason
- The concentration and sheer amount of development will change South Warrington destroying the landscape and character of its villages forever
- The Plan ignores the changing and important World focus on climate change and the need to minimise and where possible prevent environmental and ecological consequences of further development and in particular of our green spaces

For the above reasons and those expounded in my letter of objection dated 11 June 2019, I consider the Updated Proposed Submission Version of the Local Plan to be fundamentally flawed, undeliverable and unsound.

I confirm that I would be happy to participate in the oral examination of the Plan and look forward to receiving an invitation.

Kind regards

Christopher P Fox FRICS