From:
 Local Plan

 To:
 Local Plan

 Date:
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Local Plan Planning Policy & Programmes Warrington Borough Council New Town House Buttermarket Street Warrington WA1 2NH

To whom it may concern

Warrington Proposed Submission Version Local Plan 2017-2037

I think the plan is unsound for the following reasons:

Objective W1/Policy DEV1

The plans for economic growth are not realistic given the current economic uncertainty. Housing figures have been inflated by using outdated figures. In a time of Climate and Environmental Emergency the number of houses to be built should be the minimum possible based on actual need. Reducing the plan length by 5 years and using 2016 figures would result in an amount approximately one third of that proposed which would allow the Green Belt to be preserved.

Economic development should be in the renewable energy sector and other industries which can address Climate Change issues.

DEV4.

The Fiddlers Ferry site should be used for economic development or other previously developed brownfield ie current empty warehouse space. There is no justification to release Green Belt for warehouses when there is no guarantee that they are needed or will create jobs- as evidenced by Omega and the empty warehouses available already Warrington.

GB1 /DC4

The plans to lose part of Moore Nature Reserve and Green Belt habitats is unjustified in a time of Climate and Environmental Emergency. The loss of habitats will further endanger the species such as Great Crested Newts, skylark, hedgehogs etc which are already at risk. Natural habitats must be preserved - the Green Belt and Nature Reserve.

.PolicyDC1/ 0S6/OS7/ OS8

Lymm is already poorly served with amenities particularly since the loss of Tanyard Farm and the occupying food outlets and gyms. The character has changed as more and more housing estates have been built. The remaining Green Belt must be preserved and no more houses must be built to preserve the character of the village. From the maps which are quite hard to interpret, it looks like the Garden Suburb Economic Area also falls within the boundary of Lymm Parish. This is even more Green Belt that will be lost, including a farm (Howshoots Farm) and associated land which characterise the surrounding rural area. The omission of this site from the policies for Lymm Green Belt site is a serious error as it means the correct documents have not been referred to (only the Appleton Thorn Neighbourhood Plan not the emerging Lymm Neighbourhood Plan, Lymm Heritage and Character Assessment). This also means that the consultation process has not been followed correctly as incorrect information has been provided.

INF1

The road network is already at capacity - infrastructure needs to be put in place to solve the current traffic and pollution issues. There are no plans to change the motorways at the interchange where the distribution centre is planned. HGVs frequently overturn on the roundabouts and the plans to widen the roundabout to three lanes will worsen this dangerous situation.

INF3

Our broadband speed is 2Mb, if it is working, which has made studying and socialising with my friends quite difficult. WBC need to insist that the Statutory undertakers for Telecommunication install high speed broadband to all residents before they plan any more growth.

ENV 8

The poor air quality in Warrington is amongst the worst in the UK for PM2.5. One of the core principles of the DLP should be to improve air quality. This will not be attainable with the plans for growth. Development must be halted in areas of poor air quality, traffic must be reduced and WBC need to install more monitors to inform future development based on actual measurements not seriously flawed computer models.

Policy DC6/ENV8

DC6 1f The wording 'no development if there is unacceptable adverse impact on the amenity of neighbouring properties' will carry no weight as it is open to interpretation. WBC have already passed plans for B2 which will lead to loss of amenity- noise, light and air pollution - next to our houses. This is contrary to the current WBC policies which have been ignored, despite the area having NOx levels which are higher than they should be.

ENV7 This policy must enable WBC to address the Climate and Environmental Emergency and achieve net carbon neutral by 2030 or preferably 2025.

The National Planning Policy Framework requires the Plan to be aspirational but **deliverable**. I do *not* believe this Plan is deliverable and is therefore *unsound*:-

There is no evidence that jobs will be delivered or that the houses can be built at the rate required in this plan. (annual average delivery of 945 new houses is more than double the current build rates 359 in 2018/19).

The majority of funding for infrastructure comes from developers - it is not guaranteed.

Social housing is required but there are no details for how this will be delivered.

Warrington must declare a Climate and Environmental Emergency and then take appropriate action. This over optimistic growth, including logistics, 18000+ new houses and loss of Green Belt will not deliver net zero carbon by 2030.

Yours faithfully,

Adam Hoskinson 15/6/19