



HOUSE OF COMMONS
LONDON SW1A 0AA

Professor Steven Broomhead
Chief Executive
Warrington Borough Council
Town Hall
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17 June 2019

Dear Steven

Warrington Borough Council
Proposed Submission Version Local Plan (draft Local Plan) Consultation

I am writing to respond to Warrington Borough Council's Proposed Submission Version Local Plan (Draft Local Plan).

I have outlined below the points that I would like to ensure are considered at this stage of the consultation process.

I produced a detailed response in response to Warrington Borough Council's 2017 Preferred Development Option. Many of the concerns I raised in 2017 remain, as do many of the objections raised by my constituents.

I want local residents to have access to good quality jobs, high quality housing, including social housing and homes for first time buyers, and a good standard of living. I also want to see our Green Belt protected from development wherever possible.

Warrington residents also want to see real, workable solutions to our transport problems. We need solutions that will tackle the real and inherent difficulties our town faces with congestion and poor air quality, as well as reducing our overall carbon emissions.

A growing number of people want to live, work and run businesses in Warrington and that should be welcomed. One of the major challenges of the Local Plan is how to meet these demands for growth while at the same time protecting existing green open space. My constituents have very valid concerns about the significant changes proposed in the Draft Local Plan and how they may transform the landscape of the town, potentially leading to the loss of natural assets.

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Although the new proposals outlined in the Draft Local Plan have reduced the amount of green-belt land proposed for development, concerns remain over any loss of Green Belt. I will outline these concerns in more detail below.

The need for a Local Plan

I am broadly supportive of the principle of developing a Local Plan in so far as it offers our town protection from those developers seeking to carve up the countryside – searching for the prime areas of Green Belt or green spaces to cherry pick for housing and employment development.

In preparing the Plan, the challenge for Warrington Borough Council is to develop proposals that will:

1. encourage the efficient use of land;
2. protect our Green Belt/green open spaces;
3. promote the regeneration of brownfield sites.

These three principles should form the central pillars of the Local Plan.

The Government has placed a statutory duty on local authorities to produce a 'Local Plan' to identify land for future housing and economic growth. If the Council fails to produce a Plan which meets Government approval, it will be thrown out. This would mean that the Council loses control of the planning process.

According to the House of Commons Library:

“Local planning authorities (LPAs) are strongly encouraged to prepare a Local Plan which sets planning policies in a local authority area, but some have not done so. Where there is no Local Plan, LPAs will often become liable to the “presumption in favour of sustainable development”. An up-to-date adopted Local Plan and/or 5-year housing supply is therefore important for LPAs wishing to control where development should go.”ⁱ

The Government has been pressing local authorities to develop the plans and in some cases Ministers have intervened in the process. In November 2017, Secretary of State Sajid Javid wrote to 15 LPAs, setting out his intention to intervene. In a speech to a planning conference in March 2018, he reiterated his frustration with those LPAs “lagging behind” and leaving themselves open to speculative development.

Referring to local plans, Matt Thomson, Head of Planning at the Campaign to Protect Rural England, has stated that:

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“Without a local plan, councils and communities have little control over the location and type of developments that take place. This results in the wrong developments in the wrong places - local communities’ needs are ignored and valued countryside destroyed for no good reason.”ⁱⁱ

Clearly, creating a plan which highlights where development should go gives our town the ability to direct development and not have it imposed unwillingly. People need access to decent homes and good jobs. However, striking the right balance between providing those homes and protecting our green spaces is crucial.

Getting this plan right means that we will not be at the mercy of developers. It means that as a town we can reject the developments that we do not want because we have a robust planning framework within which local planning applications can be considered effectively.

Constituents’ concerns

Since the launch of the consultation, I have met many constituents and listened to their views on the Draft Local Plan. There is a great deal of uncertainty and anxiety over the proposals. There is significant concern over proposals that could see substantial parts of the existing Green Belt re-designated for development. I share my constituent’s concerns on this.

During the consultation period, I have taken several actions to ensure that as many people can have their say on the proposals as possible. I have also acted to facilitate a brownfield-first approach to development and to try to protect our Green Belt. To do so, I have:

- Hosted a local housing summit to look at the action that is needed to address the housing crisis – including measures to free up brownfield sites and in doing so relieving pressure on the country’s Green Belt.
- Called on the Government to act urgently to put an end to land banking.
- Ran a traffic survey to look at ways to try to tackle local traffic issues and this is being fed back into the Council’s consultation on the Local Transport Plan.
- Called on Warrington Borough Council to declare an environment and climate emergency – advocating the need for ‘urgent and concerted action’ to tackle the escalating international ecological crisis.
- Distributed thousands of leaflets across the constituency providing information about the consultation.
- Held roving surgeries in the areas affected to discuss any concerns.
- Objected to the Eddie Stobart and Six:56 planning applications, which propose to develop employment sites within the Green Belt.

For information, I have included a brief snapshot of some of the concerns raised with me over the course of the consultation:

- Pollution in Warrington is the worst in the country and with Stobarts, Six56, 19,000 more houses and with increased numbers of HGVs and cars it will get much worse.

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- The council should stop planning high value houses in the south of the borough that will be unaffordable to many local residents. More genuinely affordable houses are needed.
- Any growth should be linked to transport infrastructure improvements, and these should happen BEFORE houses are built.
- The council should prioritise building on brownfield sites over green belt.
- Air pollution is already poor in parts of Warrington, and this is now incontrovertibly linked to health issues and early deaths.
- To have HGVs passing through and by housing estates 24/7 with noise, vibration, pollution the danger to pedestrians and cyclists, in particular school children (there are three schools adjacent to Witherwin Avenue), is totally unacceptable.
- There is a very strong feeling that increased pollution from traffic will have a long-term detrimental impact on the health of Warrington's young people.
- Residents strongly believe that the Local Plan as it currently stands will destroy the town that we all love.
- The loss of green belt will be an absolute tragedy and cannot be mitigated in any way. Of particular concern is the possible loss of part of Moore Nature Reserve to allow further Port Warrington development.

Calculating housing need in the Local Plan

The Local Plan aims to deliver 18,900 new homes (or 945 a year, up to 2037) and 362 hectares of employment land. Information on the Draft Local Plan consultation page of Warrington Borough Council's website states that:

"The Government guidelines tell us we need to build at least 18,900 homes over the course of the plan, which exceeds what urban land we have available. Therefore, we need to look hard at other areas of land we could develop on, including Green Belt, in order to meet our development obligations. If we don't, the Plan would not get through independent examination, in some cases, the Government could intervene, and we'd lose control of the process."

The Government's 'National Planning Policy Framework' (NPPF) and the 'Housing and economic needs assessment' set out the statutory ground rules, procedures and processes that local authorities need to comply with when drawing up their 'Local Plan'.

The Government has made it extremely clear that they expect strategic planning authorities, like Warrington Borough Council, to calculate their 'housing need target' by using the prescribed 'standard method' set out in the 'Housing and economic needs assessment'. The NPPF states:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national

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planning guidance – unless exceptional circumstances justify an alternative approach”.ⁱⁱⁱ

The ‘Housing and economic needs assessment’ sets out in detail the Government prescribed ‘standard method’ the Council is expected to use to assess their housing needs. This Government prescribed ‘standard method’ determines the ‘minimum annual housing need’ figure to be used by local authorities when drawing up their Local Plan.

The Housing and economic needs assessment states:

“The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need.

The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.”

By expecting councils to use this ‘standard method’, the Government is setting a minimum local housing need target that local authorities must comply with. Confirmation of this fact is contained in the official report of Parliament.

Hansard records that during a Parliamentary debate in February of this year Minister of State for Housing, Communities and Local Government Kit Malthouse MP stated:

“I should clarify what the local housing need target is. It is exactly that—a target. It is a baseline from which a local authority can work to effectively establish the number of homes that it needs in its area...”

This statement in Parliament by the Minister directly responsible for the National Planning Policy Framework (NPPF) confirmed that the ‘local housing need’ figure is a target set by the Government.

On 20 February 2019, the Government confirmed that councils should use the ONS 2014-based household projections rather than the more recent and lower 2016-based household projections when calculating housing need.

The Government has also stated that if Warrington Borough Council was to use 2016 projections, the Local Plan would be considered unsound.

Using the 2014-based projections means that the Government requires Warrington to set a higher ‘local housing need target’. And, by requiring Warrington uses the 2014 data, the Government is pressing Warrington Borough Council to build more houses at a faster rate and in doing so is putting our Green Belt land directly under threat of development.

Yet the NPPF clearly states that:

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“The general extent of the Green Belt across the country is already established”.

“Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”.

We see here the NPPF imposing conflicting requirements on Warrington Borough Council, that is to simultaneously provide sufficient land to meet future projected housing need and protect the Green Belt.

The NPPF does not give any clarity on how these two conflicting requirements are to be resolved.

Given the above, what action has Warrington Borough Council taken in regard to challenging the Government on this matter? And, has a request been made for the town to be given special dispensation to use the 2016-based household projections to determine the ‘housing need target’ as the basis of its plan? Such a move from central Government would allow the Council to safeguard local Green Belt land.

Housing crisis

Across the country, we are facing a housing crisis. Many people are struggling to afford to rent or to buy a decent home. This is leading to overcrowding, evictions, rent arrears and homelessness.

The number of socially rented houses in England has been falling consistently since the 1980s; between 1981 to 2016 social housing stock has decreased by 25%. In 2016, 17% of houses were socially rented compared to 30% in 1981. Right to buy, a policy introduced in 1980, allowed local authority tenants to purchase their council houses at a reduced rate, which has contributed to reducing social housing stock numbers. A commitment to replace a proportion of the properties sold under the scheme was introduced in 2011, although latest statistics suggest that these obligations are not being met.

Over the same period, central government funding for building new homes for social rent was also reduced, replaced in part by funding for construction of homes for affordable rent, with rents up to 80 percent of market rates.

In April, I hosted a housing panel event with Labour’s Shadow Housing Minister Sarah Jones MP; Leader of Warrington Borough Council, Councillor Russ Bowden; Torus Chief Executive Steve Coffey; and the Founder of the National Leasehold Campaign, Katie Kendrick. I organised the event as a forum for Warrington South residents to raise and discuss any housing concerns. The four main issues raised were the Local Plan, the development of Green Belt, the leasehold scandal, and the need for more social housing.

During the event, Shadow Housing Minister, Sarah Jones MP, informed the meeting that the building of social housing was at the lowest level since World War Two. She also underlined

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the need to scrap the Conservative Government's definition of 'affordable rent' housing, replacing it with a new definition linked to local incomes.

We need to provide the right mix of housing so that we can address the housing crisis. However, it is clear that this crisis will not be resolved by developing the Green Belt.

Safeguarding Warrington South's Green Belt

Policy GB1 - Green Belt

According to the Draft Local Plan, the following land from the following Warrington South sites could be removed from the Green Belt:

- a. Warrington Waterfront
- b. Garden Suburb
- c. South West Urban Extension
- h. Land at Lymm

By far the biggest concern raised by constituents with me on the Local Plan has been on the proposals to build 7,064 of the designated 18,900 new homes on Green Belt land and to earmark 215.15 ha of the 361.71 ha as employment land from the Green Belt. I wholeheartedly share those concerns.

Like many of my constituents, I have real concerns about proposals which earmark swathes of Green Belt land for large-scale development, altering the designation of large areas of this protected land and changing the character of the local landscape.

The Green Belt covers 13% of England, providing a valuable escape from urban life and offering many health benefits and opportunities for outdoor recreation. Once this land is released from the Green Belt, it will set a worrying precedent for the future of other areas of our protected green space, potentially opening the floodgates for further changes to our Green Belt policy.

Exceptional circumstances not demonstrated

3.4.10 Exceptional circumstances can also be demonstrated for each area of Green Belt release:

"The exceptional circumstances for the removal of Port Warrington from the Green Belt relate to the specific demand for Port facilities servicing the Manchester Ship Canal, the location of the existing Port and the potential to connect the Ship Canal to the strategic road and rail network."

"The exceptional circumstances for the removal of the Waterfront Business Hub from the Green Belt relate to the overall need for employment land, the opportunity to

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provide complementary employment space for Port related development and the proximity of the site to the Town Centre and Bank Quay station.”

I do not believe these reasons to be exceptional circumstances. All proposals for the expansion of Port Warrington identify this area as an “opportunity”. There is no evidenced existing need or specific demand within Warrington.

In Peels’ own words (Warrington Waterfront Justification Document) the primary purpose for the expansion of Port Warrington is to address the shortfall of available land in the Mersey Ports Masterplan (MPP).

There is an unmet land requirement to deliver port related facilities to meet forecast demand as originally identified by the Mersey Ports Masterplan (MPP). An expanded Port Warrington (in addition to that which was originally envisaged in the MPP) can assist in addressing the shortfall and accommodate a large proportion of this growth to continue to drive economic growth in Warrington and across the subregion.

It should also be noted that the land requirements across the MPP have been disaggregated to accommodate Peel-owned pockets of land across the Manchester Ship Canal. The proposed expansion of Port Warrington would see this area triple in size, notwithstanding the additional warehouse and logistics bases proposed for the Waterfront Business Hub.

“Future network interventions by the public sector will only increase rail capacity in the future”

“The overall forecast for daily HGV movements is for 513 inbound HGVs and 513 outbound movements or an average of 21.4 HGV movements in each direction per hour over a 24-hour period.”

I should also note the main proposition for expanding of Port Warrington relies on taking advantage of multi-modal transport via the use of rail, road and waterways. To my understanding, rail capacity for the port is enough to serve one freight path per direction, per hour. I have serious concerns that Heavy Goods vehicular traffic will dominate this area as a new distribution & logistics hub, adding over 1,000 HGV movements per day (circa ~374,490 per year). **This is absolutely ridiculous.**

According to the National Planning Policy Framework, the Green Belt serves five purposes:^{iv}

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns;
- and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF also makes it clear that:

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“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”^v

Within our Local Plan, we have a real opportunity to think more creatively and work hard to safeguard our Green Belt.

I appreciate that the Council is committed to future-proofing as much of the Green Belt as possible and I welcome the fact that the Council has responded to concerns raised by me and local residents during the 2017 PDO process by reducing the amount of Green Belt earmarked for development. However, giving way on the release of Green Belt, no matter how small, makes the protection of these sites more uncertain in future. I strongly believe we cannot afford to lose these environmental assets.

According to National Planning Guidance, this land should only be developed in the most exceptional of circumstances. It should be protected from development wherever possible. I remain unconvinced that the case has been made for the re-designation of significant parts of Warrington South’s Green belt.

The development of this land will change the character of the town.

There are concerns, which I totally share, that the loss of this land will lead to urban sprawl and countryside encroachment. This will mean that the character and distinctiveness of the whole of the South Warrington area would be dramatically changed.

Green Belt development will not solve the housing crisis

Development in the Green Belt may seem like a simple way to solve the housing crisis, but it is not. It is not a viable solution to this crisis.

We must do all we can to protect and enhance the Green Belt in a way that benefits as many people as possible. People need both good affordable housing and access to nature. And as the CPRE states, *“if we use land well, we can do both.”*

When this green and previously undeveloped land is released to developers, it is not low-cost housing they are looking to bring forward, but the homes likely to generate the highest profit.

According to the CPRE, 84% of homes built on Green Belt in recent years have been for the middle or top end of a market that is already unaffordable for most people unless they already have access to existing housing wealth. Removing land from the Green Belt for development results in the loss of access to countryside without addressing the housing shortage.

The Green Belt offers many health benefits

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The benefits of the Green Belt are well documented – recreational, environmental, agricultural, health and wellbeing. Green space is an important environmental asset for local communities, particularly in otherwise built up areas. It serves as a crucial green lung for our town.

“The Green Belts are a cherished asset, and they’re also extremely valuable for food production, flood prevention, climate change mitigation and much more.”^{vi}

There are substantial health benefits in accessing Green Belt land for recreation and leisure purposes and ultimately this land can improve quality of life for residents.

The CPRE’s 2018 report *State of the Green Belt* notes that:

“Despite the number of benefits Green Belt land supplies, there are increasing calls to build on it, from releasing ‘scruffy’ bits of Green Belt to abolishing it completely. However, these calls overlook the importance of the permanence of the Green Belt in discouraging speculative applications for bad development and encouraging urban regeneration. They also see Green Belt as merely land waiting to be built on, ignoring the wider benefits - such as providing valuable farmland, offering recreation opportunities and increasing mental wellbeing.”^{vii}

The World Health Organisation emphasises the importance of these green spaces, stating:

“Green spaces also are important to mental health. Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity in a natural environment can help remedy mild depression and reduce physiological stress indicators.”^{viii}

According to the World Health Organisation, insufficient physical activity is one of the leading risk factors for death worldwide. Insufficient physical activity is a key risk factor for non-communicable diseases (NCDs) such as cardiovascular diseases, cancer and diabetes.

Physical activity has significant health benefits and contributes to prevent NCDs. Globally, 1 in 4 adults are not active enough. More than 80% of the world's adolescent population are insufficiently physically active.^{ix}

The use of parks and green spaces in Warrington for exercise and health reasons has been increasing. We should be looking at how we can continue with this success. We need to ask ourselves whether we want to pursue proposals that could see the town lose its green assets

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or whether we want to be a town which thinks about growth in a different way: meeting needs whilst protecting the green spaces that are so important to residents.

Green spaces also provide a longer-term positive effect on life satisfaction and are good for people's wellbeing.

According to the Land Trust:

"...everyone should have access to well-managed, good quality, green space which has contributes significant to people's health and wellbeing. The benefits include:

- *Improving and strengthening physical and mental health*
- *Promoting healthy and active lifestyles, being places to exercise, relax and unwind.*
- *Increasing community cohesion, reducing anti-social behaviour, isolation and stress.*
- *Creating opportunities for working, learning and development, volunteering and connecting people in a positive way to their local area*
- *Improving air, water and soil quality, which in turn reduces pollution and the associated negative health impacts*
- *In addition to these benefits to health and wellbeing, supporting green spaces makes economic sense. The business case for investment is that it:*
- *Reduces the pressures on public health services and thereby reducing potential costs*
- *Reduces business costs relating to absenteeism and lost productivity from ill health.*

Green spaces make a demonstrable contribution to health objectives by providing safe, clean, green, accessible environments for people to use and enjoy."^x

These areas of land are important assets and like many local people I want to see our Green Belt and, wherever possible, our green open spaces, protected from development for the benefit of future generations.

Brownfield first approach

I support a brownfield first approach to development and I welcome proposals that would see the revitalising of empty or neglected sites that were once home to industry and to achieve this a regeneration strategy is essential.

I encourage the Council to continue with work to ensure that these sites are developed now and not overlooked in favour of the more attractive sites that will be cherry picked by developers.

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In pursuing a brownfield first approach to local development, I have been taking an active role in helping to facilitate this. I have:

- Backed infrastructure proposals that will improve access and help to reduce congestion in and around the town centre.
- Supported funding bids to rejuvenate the town centre, helping to strengthen its future viability and spoken out in Westminster against Green Belt development.

I have also called on the Government to introduce new powers that would put an end to the practice of land banking and in doing so, free up more brownfield sites.

Land banking means that brownfield sites are not being brought forward for development and this in turn is putting intense pressure on the Green Belt and green open spaces. This is because the hoarding of land enables developers to cherry-pick sites that will make the most profit – namely the green spaces.

Research by the Campaign to Protect Rural England has found that the amount of farmland, forests, gardens and greenfield land lost to housing development has increased by 58% in the four years leading up until 2018. I believe it is time for the Government to bring forward the powers that are needed to protect this land.

While the revised National Planning Policy Framework made some changes to improve the protection of green spaces these measures have simply not gone far enough. The Government must go further to protect green spaces and prevent land banking.

In addition to putting our green spaces under threat of development, land banking is also slowing the increase in the housing stock that we urgently require as a country to tackle the housing crisis.

In 2017, housing charity Shelter estimated that 320,000 homes which have been given planning permission in the five years previously had not been built. That alone represents much more than a year's worth of the supply of new homes that we need.

I have called for urgent Government action on this issue – compelling developers to build out sites with planning permission and to release brownfield land for development. Local authorities should be given stronger powers to compulsory purchase banked brownfield land, for the purpose of building more affordable and social housing.

Tough government action on this issue will help to safeguard our Green Belt and green spaces and help to bring forward the housing that we need.

Agricultural, climate and ecological benefits to safeguarding the Green Belt

According to the CPRE, Green Belt land is where you can find 12% of all our priority habitats, including concentrations of woodland, lowland heath land, lowland meadow and lowland fen, discrediting the argument that all Green Belt land is poor quality.

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“The land contains significant resources of natural capital, affording us an opportunity to create and restore natural habitats and ecological networks that have come under threat from development and intensive agriculture.”^{xi}

The CPRE tells us that in the North West, 22% is Grade 1, Grade 2 or the ‘best and most versatile’ agricultural land, with the highest amount of Grade 1 land of any Green Belt. Compared with 17% of land nationally. 69%, or 171,914 ha, is currently in agricultural use. 48% of the total agricultural land is subject to Natural England funding ‘agri-environment schemes’, compared to 67% of agricultural land.^{xii}

Given the above, this could mean that to bring forward these significant developments, important agricultural land would be lost.

This is contrast to the NPPG, which directs local planning authorities to seek to use poorer quality over higher quality agricultural land.

Given the trend for locally-sourced food and fuel, I believe that we should be focusing efforts on making the best use of this land in a sustainable way.

As the various international bodies responsible for advising the world on climate change, biodiversity and ecosystems have made clear, if we continue on our current path, we face causing unthinkable damage throughout the UK and for people and communities around the world.

It was for this reason that I supported the recent House of Commons' declaration of an environment and climate emergency.

Declaring this emergency must now mean devoting the time and resources necessary to deal with the scale of the problem we face.

This includes reducing our greenhouse gas emissions as quickly as possible, properly funding environmental protection and legislating to move towards a zero-waste economy. It also means a green industrial revolution to capture the jobs of the future, while protecting vulnerable workers and members of the public.

The Intergovernmental Panel on Climate Change (IPCC) October 2018 report assessing the science on climate change has been a major catalyst for campaigns on a climate and environment emergency.

The IPCC report found that limiting global warming to 1.5°C would require "rapid and far-reaching" change. It says that global net human-caused carbon dioxide emissions would need to fall by about 45% from 2010 levels by 2030, reaching net zero around 2050.

In response to the IPCC report and at the request of the Government, the UK's independent climate adviser, the Committee on Climate Change (CCC), recommended an emissions target

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for the UK of net zero greenhouse gas emissions by 2050. It said this target was achievable with known technologies, alongside improvements in people's lives, and should be put into law as soon as possible. However, it said policies will have to ramp up significantly for a net zero emissions target to be credible.

The Prime Minister, Theresa May, has now announced that greenhouse gas emissions in the UK will be cut to almost zero by 2050, under the terms of a new government plan to tackle climate change.

That means emissions from homes, transport, farming and industry will have to be avoided completely or - in the most difficult examples - offset by planting trees or extracting CO2 out of the atmosphere.

Climate change is one of the most pressing issues of our time and it is happening at a terrifying pace. Only through urgent and concerted action can we tackle this escalating international ecological crisis. Doing nothing is simply not an option.

With our wildlife in decline, habitats being destroyed and climate change progressing at an alarming rate, we need to keep the pressure up on this issue and take the urgent action that is necessary to reverse the current crisis.

In April of this year I called on Warrington Borough Council to declare an environment and climate emergency. Everything the Government, MPs and local government does on this issue must be judged by whether we are making progress on reducing carbon emissions and fighting the effects of climate change. This means doing things in an entirely different way, so we have a permanent low-carbon sustainable economy.

Warrington Borough Council should be taking the radical action that we need in the face of this international and time-critical crisis. This must include fighting for the protection of our Green Belt which plays such a fundamental role in helping us to combat this global issue and offsetting our carbon footprint.

Policy specific comments

Policy DEV4 - Economic Growth and Development **Employment Land Requirement**

“Over the 20-year Plan period from 2017 to 2037 provision will be made for a minimum of 362 hectares of land for B1, B2 & B8 uses to support both local and wider strategic employment needs.”

The following sites will be removed from the Green Belt and allocated as new Employment Areas in order to provide sufficient land to meet Warrington's Employment Land Requirement:

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- a. Garden Suburb – 116 hectares
- b. Port Warrington – 74.36 hectares
- c. Waterfront Business Hub – 25.47 hectares

As is clearly outlined above, I oppose the loss of Green Belt land for development. I also question the economic forecasting that has been conducted and feel that the employment assessment is overly ambitious.

The sites listed above are substantial in size and entail a huge expansion for the town. Proposals seeking to develop enormous logistics hubs with HGVs and other associated vehicular movements simply cannot be accommodated and I am concerned that their impact on local levels of congestion and air quality will be significant. Such an approach will not create the sustainable and greener environment we should be urgently striving for.

Warrington's roads are already congested and struggle to meet existing demand. I am concerned that the loss of green space and the large-scale development proposals for the borough will exacerbate these congestion problems.

The local road and motorway network is already at the point of gridlock at peak times. If there is an incident on the surrounding motorway network local roads come to a standstill. Our local roads are already reaching saturation point.

Additionally, a significant increase in vehicular movements means additional traffic pollution. No attention appears to have been given to the higher levels of pollution that would be generated by such a large increase in heavy-goods vehicles travelling in and out of the local area.

Air pollution is associated with several adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.

I am concerned that significant areas of development, particularly through the development of our green spaces, could also have an impact on the health of local residents due to increased air pollution from the additional vehicular movements.

Across the UK, it is estimated that 40,000 people die prematurely each year due to poor air quality. In addition, poor air quality leads to a reduction in quality of life and wellbeing with increases in GP appointments and hospital admissions. In Warrington it is estimated that approximately 145 people per year die prematurely from poor air quality.^{xiii}

In Warrington, in 2013, 4.8% of all mortality was attributable to man-made particulate pollution, slightly worse than the average for the north west of 4.6%.^{xiv}

Given the nationally declared climate emergency – surely this increase in vehicular movements at the expense of our Green Belt will only serve to make matter worse.

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I have previously made clear my strong objections to the recently submitted Eddie Stobart and Langtree (Six:56) planning applications. My objections still stand.

Policy MD1 - Warrington Waterfront MD1.1

“In order to facilitate development, the southern section of the allocation site, comprising the 2 employment sites, will be removed from the Green Belt.”

I am opposed to the Port Warrington expansion proposals.

I have serious concerns about the proposals for Port Warrington and the impact they will have on the town. The proposals offer no benefits for local people or the town. The increase in freight traffic on Manchester Ship Canal will lead to further congestion on local roads as will the increase in HGVs travelling to and from the proposed Port.

Warrington Western Link

Warrington has a pressing need for major infrastructure projects to reduce congestion and by doing so, improving air quality in the centre of town. As it stands, our roads are not fit for purpose and without investment in our infrastructure, the problems we have with congestion are only set to get worse.

The Warrington Western Link project would provide the town with a second-high level crossing of the Manchester Ship Canal, improving connectivity between the north and south of the town. It would also free up brownfield sites for housing.

Proposals for a Western Link were first suggested over 30 years ago and yet to date have never materialised. Warrington is long overdue infrastructure investment of this scale. Central government funding for infrastructure investment of this size offers Warrington a ‘once in a lifetime’ opportunity to make this long sort after addition to our road network a reality.

I supported in principle proposals for the Warrington Western Link project, because I believe they will go some way to ameliorate these problems, playing an essential role in relieving congestion, reducing travel delays and improving air quality in the centre of town – offering long-term solutions that will help current and future generations.

However, I have always made it very clear that this link should not be used to facilitate commercial development. I object to the Port Warrington expansion proposals. I do not believe that they will benefit our people or our town. The Port will not create quality jobs for the town and will lead to an increase in HGV movements and air pollution. **My objections to the Port Warrington proposals still stand and I will continue to campaign alongside residents for them to be scrapped.**

“10.1.22 The expansion of Port Warrington will result in the loss of part of Moore Nature reserve and a number of important ecological assets.”

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I am opposed to any loss of Moore Nature Reserve.

Moore Nature Reserve has areas of woodland, meadows, five large lakes and wetlands and is home to a diverse range of plants, animals, birds and mammals. It is considered locally to be a very important environmental asset.

In response to the Council's 2017 PDO Cheshire Wildlife Trust's Evidence and Planning Manager, Rachel Giles, stated:

"We believe developing this site would be highly damaging to local biodiversity, the local community and would be environmentally unsustainable."^{xv}

The Trust submitted a response outlining "...the harm a development on the nature reserve would cause to species such as dragonflies, bees, butterflies, breeding and wintering birds..."

Charlotte Harris, Chief Executive Officer at Cheshire Wildlife Trust has also said that:

"Moore Nature Reserve is not only a haven for species but a great asset to the community. There is a bank of evidence of how visiting green spaces and getting outside helps people deal with stress and improve mental health. This site has become a go-to place for people in the community appreciating this benefit..."^{xvi}

Given the above, I cannot support and strongly object to the proposals for the expansion of Port Warrington and I am calling on Warrington Borough Council to protect Moore Nature Reserve.

Policy MD2 - Warrington Garden Suburb

"Land to the south east of Warrington, bounded by the M56 to the south and predominantly the A50 to the east, will be removed from the Green Belt and allocated as the Garden Suburb sustainable urban extension.

The Garden Suburb will deliver approximately 7,400 homes and 116 hectares of employment land. Around 5,100 homes and all of the employment land will be delivered within the Plan Period."

Once again, I want to make it clear that I do not support the loss of the Green Belt for development.

I am concerned that this development would result in extensive urban and commercial sprawl – changing the character of this area and resulting in a reduction in local green space.

Since 2000, there have been more households with two or more cars or vans than households with no car or van.^{xvii} An additional 7,400 homes could mean a further 14,800 cars in this area

Member of Parliament for Warrington South

– excluding the HGV and other vehicular movements associated with the employment usage. This would result in a significant increase in the volume of traffic on local roads.

Concerns have been raised with me about the HGV traffic that would be generated by the logistics facilities. With frequent movements in and out of the area – through the local villages – generating further congestion, air and noise pollution and adding strain to the local road infrastructure with associated increased pressure on existing roads (A49, A50, B5356), and the local motorway networks, which are already frequently gridlocked.

Any increase in traffic pollution levels would be harmful to local residents. I support action to reduce pollution by introduction eco-friendly modes of transport – given the climate emergency we are facing we need to be looking at radical ways to reduce not exacerbate air pollution. Increasing traffic congestion, increasing air pollution and depleting our green spaces is clearly the wrong approach which will only make matters worse.

While the Local Plan outlines the infrastructure to support the new village developments, constituents raised concerns about the lack of detail on how this will be brought forward and how it will be funded.

The employment land is allocated for distribution and industrial uses (B8, B1c and B2).

I want to see our economy proposer with the creation of good employment opportunities. I want to see well-paid jobs in the industries of the future introduced. As it stands, too many people face insecure work, low pay and zero hours or temporary contracts, which are causing stress and financial hardship. I am concerned that the jobs that are being proposed will not address these employment issues.

Policy MD3 - South West Urban Extension MD3.1

“Land comprising approximately 112ha to the south west of Warrington will be removed from the Green Belt and allocated as a sustainable urban extension. The allocation will deliver a new residential community of around 1,600 homes.”

As above, I object to proposals which seek to develop land in the Green Belt.

Para 4.2.24 – Draft Local Plan (page 54) – Fiddler’s Ferry Power Station

“The Council is aware that while Fiddlers Ferry power station is likely to continue operating into the next decade, Government energy policy is putting pressure on cessation of coal power by 2025. The site may therefore come forward for development and represents a major future brownfield redevelopment opportunity for new employment uses.”

Given reports that the site will close on 31 March 2020^{xviii}, will the above reference to the site in the Draft Local Plan now be reviewed in order to safeguard the town’s Green Belt?

Member of Parliament for Warrington South

By bringing this forward, the proposals could preserve the areas of Green Belt now under consideration for development. I appreciate that the Council is under immense pressure from the Government, given significant changes to the planning process. However, I would ask that the Council makes every effort to pursue brownfield sites like this.

Policy INF4 - Community Facilities

Pressure on local services

I have serious concerns about the impact that the proposed new housing developments could have on our local services, including on demand for school places and on GP practices.

General demand on our local medical practices and on Warrington Hospital is already high. New housing developments across my constituency are placing additional pressure on both our local GP services and our schools. An assessment of the impact of the proposed developments on these vital local services must be paramount and proposals to ensure that this pressure is relieved have to be produced as a priority.

Whilst it seems sensible to develop a strategy which outlines how and where jobs and homes will be created in future, planned growth needs to be proportionate and development should not be detrimental to the quality of life of Warrington residents.

Warrington Hospital

With parts of the current hospital facility more than 100 years old, and essential maintenance costing around £2 million a year, it is a huge challenge to run an efficient and effective hospital facility. The current hospital is outdated and cannot fully meet the needs of patients or staff. We need an ultra-modern general hospital fit for the 21st Century.

Warrington patients and our fantastic NHS staff deserve a centrally located, fit for purpose facility from which to work and receive treatment. This must be a site accessible for all Warrington residents.

For a place as large as Warrington, and which is growing, we need that facility to cater for the full-service needs of patients – including comprehensive A&E services.

There is nothing more important than the health and wellbeing of the people in our town. We deserve the appropriate services to meet the needs of local people. We know that there are growing numbers of elderly residents and those with complex health issues. Our local health services must be capable of meeting these challenges. I will continue to demand action to deliver high quality NHS services in Warrington.

GPs

GPs in Warrington South are working to capacity. Investment in new facilities has to be brought forward at the earliest opportunity.

Member of Parliament for Warrington South

Chapelford Health Centre was conceived around 20 years ago, ahead of the now developed Chapelford Urban Village. For more than 10 years the Chapelford Health Centre that serves this community has been operating out of a portacabin on a piece of waste ground. Only now is the permanent surgery being built.

These delays must not be allowed to happen again.

Broomfields Leisure Centre

Broomfields Leisure Centre is long overdue an upgrade. I have made it clear to both Livewire and Warrington Borough Council that I want to see the well-used community facility receive the investment it deserves. I want to see this work delivered as soon as possible.

Policy ENV1

Policy ENV1 sets out a clear approach and gives guidance on how development should respond to waste issues across the Borough.

“9.1.9 The Council has undertaken a review of its Community Recycling Centres (CRC), which has identified a need for additional capacity in the south of the Borough. It is proposed to meet this need by closing the existing facility in Stockton Heath and providing a replacement facility in the new Garden Suburb that will have sufficient capacity to cater for the increased capacity required.”

Following my work on this issue, I welcome the Council’s commitment to deliver an alternative community recycling centre (CRC) in the south of Warrington and I am pleased to hear that this commitment is to be enshrined in the town’s Local Plan. However, the location of the site needs to be decided in conjunction with the communities it will serve.

Given that the Council is at an early stage in finding an appropriate alternative site, it is essential that my constituents from Stockton Heath, Appleton, Grappenhall, Thelwall, Walton, Stretton, Hatton and Lymm are not left without a CRC facility in the meantime.

Although the Stockton Heath site is the smallest of Warrington’s three recycling centres it is considered by many to be the busiest. Residents from Stockton Heath, Appleton, Grappenhall, Thelwall, Walton, Stretton, Hatton and Lymm use the Centre. Demand is such, that vehicles can often be seen queuing to access the facility.

It is simply not reasonable to expect residents in the south of Warrington to travel across town to access either the Gatewath or Woolston sites. In addition to the inconvenience to residents of having to travel to an alternative site, and the cost associated; there will be an environmental cost attached to these extended journeys with increased pollution from vehicle emissions.

I believe it is crucial that the current site at Stockton Heath be kept open until the new facility is available for use.

As I have previously made clear to you, I fully appreciate that central government cuts to local authority budgets are forcing the hand of councils to make changes to the provision of services. However, decisions taken on the future of local services and the need to make savings, must be balanced with the needs of residents and the impact that the removal, even on a temporary basis, of such a service could have on the area.

Given that the Stockton Heath site is so well-used, Warrington Borough Council must retain the current facility for as long as possible to ensure that communities in the south of the town do not experience any disruption to the CRC services they receive.

Policy ENV3 - Safeguarding of Minerals Resources

Shale gas exploration and extraction

I would like to see Warrington Borough Council follow in the footsteps of Greater Manchester by effectively banning fracking. I understand that in Greater Manchester each of the region's councils are to implement planning policies which create a 'presumption against drilling for shale gas' in their areas.

If we fully exploited all the UK's shale gas reserves, we would release over seven billion tonnes of carbon dioxide into the atmosphere, twenty times our entire annual emissions for 2017. Shale gas is only a low-carbon option if it replaces coal. However, we are already replacing coal in our energy mix. Shale gas coming online now would displace genuinely low-carbon energy, not coal.

A Government report from 2015 concluded that fracking increases air pollution, with substantially higher local impacts where activities are clustered. Researchers have also expressed concern about the large quantities of waste water generated by fracking. There are also legitimate concerns about earth tremors.

Fracking is bad for the environment and bad for our climate. I believe we should be banning it.

Other policies

Affordable homes

Instances have been highlighted whereby developers have previously been able to bypass their obligations for the provision of affordable housing through reserved matters and viability assessments conducted after planning has been approved. This is completely unacceptable.

Warrington Borough Council must crack down on developers reneging on their affordable housing obligations. At present developers can apply to local councils to slash their affordable housing commitments during construction of a scheme on the basis that its overall profitability has changed since planning permission was granted. Action is needed to ensure developers follow through with their affordable housing obligations.

Member of Parliament for Warrington South

I would also encourage the Council to work with those local housing providers, which own brownfield land in the town, to ensure that good quality social housing is brought forward as soon as possible.

In regard to the private rented sector and the reduction in the number of vacant properties across the town, I would ask that the Council works with these landlords proactively to achieve a more ambitious reduction in the number of these vacant homes.

Leaseholds

There are a huge number of issues concerning leaseholds across the country, and the large number of leasehold properties in Warrington has meant that we have been hit especially hard by the leasehold crisis.

To date, Government action to address this mis-selling scandal has been slow. One way to try to tackle the problem might be for local authorities to act at a local level. This could be achieved if Warrington Borough Council made it clear, in its own housing policy, that any new build homes coming forward for development must not be leaseholds. If this could be introduced, it might help prevent more homeowners being tied into unfair leasehold terms.

It would set a great precedent if Warrington Borough Council could introduce such a policy, which could then inspire other local authorities to follow suit. I hope that serious consideration can be given to this.

In conclusion

The Local Plan will have far-reaching implications for our town. Like my constituents, I have concerns about the significant changes that are being proposed and how they may transform the landscape of the town.

While I welcome the reduction in the number of homes proposed and the reduction of Green Belt earmarked for development compared to proposals as outlined in the 2017 PDO, I remain concerned that the proposals in their current form will add a great strain to our already overstretched local infrastructure and will exacerbate local problems with poor air quality. Any action that makes air quality worse for my constituents is unacceptable.

I urge the Council to press the Government for special dispensation for the usage of the most up-to-date population projections available to local authorities, to enable the Local Plan to be based on realistic figures in order to safeguard our Green Belt.

I believe that the development of local Green Belt land is the wrong approach to take to meet the housing needs set out by Government. Not only does it mean the loss of our much-loved Green Belt – but it opens the floodgates to the future loss of this land.

Member of Parliament for Warrington South

Green Belt land should only be developed in the most exceptional of circumstances and it must be protected from development wherever possible. I do not believe those exceptional circumstances have been adequately justified.

At a time when we have seen a national climate change emergency declared, our town simply cannot afford to lose these areas of green space. It has so many benefits – for the environment, for health and for our wellbeing.

The final plan must respond to the needs and the wishes of our residents. They must be driven by local communities and not imposed on them.

We need a strategy which focuses on the regeneration of our brownfield sites – including the Fiddlers Ferry site.

We need the right mix of housing. The provision of homes in the private, rented and social sectors for older people and single people is therefore essential.


Affordability and proximity to the services that people require is essential and bringing forward associated infrastructure in a timely way is crucial.

I welcome proposals that will help my constituents to access good quality jobs. However, alongside economic benefits, we must also ensure that residents maintain access to quality green open spaces and have improved local transport provision.

The final Plan must represent the way Warrington residents want their communities to grow. The Plan should not run counter to the wishes of residents. Local people must have a leading role in shaping the plan.

Please register the comments raised above as part of the Local Plan process.

Yours sincerely



Faisal Rashid MP

ⁱ *What next for planning in England – The National Planning Policy Framework* – House of Commons Library, 10 June 2019.

ⁱⁱ <https://www.cpre.org.uk/media-centre/sound-bites/item/4923-new-planning-rulebook-heavily-criticised-by-cpre>

ⁱⁱⁱ (*NPPF para 60, p.17*)

^{iv} https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf 13

^v NPPF 2019, para 142, p42.

^{vi} <https://www.cpre.org.uk/what-we-do/housing-and-planning/green-belts>

^{vii} <https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4931-state-of-the-green-belt-2018>

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- viii <https://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/>
- ix <https://www.who.int/news-room/fact-sheets/detail/physical-activity>
- x https://thelandtrust.org.uk/who-we-are/policy/public-health-and-wellbeing/?doing_wp_cron=1560609632.9727599620819091796875
- xi <https://www.cpre.org.uk/magazine/opinion/item/4459-green-belt-one-legacy-we-can-be-proud-of>
- xii CPRE North West Green Belt factsheet -
- xiii Warrington Joint Strategic Needs Assessment (JSNA) Air Quality and Health – Feb 2018
- xiv <https://www.warrington.gov.uk/info/201090/environmental-issues/2024/air-quality-and-pollution>
- xv <https://www.cheshirewildlifetrust.org.uk/news/moore-nature-reserve-under-threat-cheshire-wildlife-trust-voices-its-concerns>
- xvi <https://www.cheshirewildlifetrust.org.uk/news/moore-nature-reserve-under-threat-cheshire-wildlife-trust-voices-its-concerns>
- xvii Source: National Travel Survey: England 2017 and Table NTS0205
- xviii <https://www.bbc.co.uk/news/uk-england-merseyside-48628334>

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