

WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN
Response by Cllr Ian Marks - 13 November 2021

I welcome the changes from the previous version of the Local Plan but do not believe they go far enough. More modifications are required to give the Plan wide acceptability with the public and make it deliverable.

It is essential for there to be a Local Plan otherwise developers will have a freer rein to do what they want and where they want, as planning powers may be taken over by the government.

I welcome the emphasis on brownfield sites, more affordable housing, and the importance of infrastructure but doubt whether this will take place as promised and believe more action is required to ensure it does. There is insufficient account taken of the need to combat climate change which is becoming increasingly important.

My submission is split into two parts. The first section refers to general comments about how the Plan affects the whole town. The second section refers to Lymm.

OVERALL

Growth and Housing

The government's housing needs methodology requires the use of 2014 projections. Using more up-to-date projections would give a lower figure. These projections force the Council to release Green Belt land to meet the 816 homes target. These predictions are unrealistic and require build rates far higher than have been achieved in the past.

They are based on economic growth figures which may no longer be realistic and should be challenged. Growth is important but should not be at the expense of other things people value like quality of life and the environment.

Green Belt

The new Plan proposes an overall reduction of 5% in Warrington's Green Belt with most of this being Homes England, a government agency, land. At the Conservative Party Conference there was talk of stopping building on Green Belt. I support this. Clarification is urgently needed on this suggested change in policy because this would have a dramatic effect on the proposals in the Plan.

The current National Planning Policy Framework emphasises preserving the Green Belt. Very special circumstances have not been demonstrated to justify the Green Belt release and the policy fails on all five tests – checking sprawl, preventing the merging of settlements, stopping encroachment into the countryside, preserving historic settlements and assisting in regeneration. Once the Green Belt is gone, it is gone for ever and cannot be replaced.

Right homes – right places

Developers want to cherry-pick sites and build large houses. This would simply attract outsiders into the town. We need genuinely affordable homes for our young people and others. 80% of full cost is no good. While the Plan asks for a high percentage of affordable housing, this is seldom delivered by developers who use viability arguments to reduce the number of affordable houses, subsidised out of the full price sales on a development.

The Plan includes no viable funding mechanism to deliver homes for social rent which are in demand across the Borough and cannot normally be subsidised out of development gains alone.

All the housing figures for sites refer to minimum numbers, so the actual numbers could be much higher. Maximum numbers should be specified too.

There is a mismatch between the type of housing being planned for the south of the town and the jobs and associated wages / salaries for the jobs planned for this area. Skilled workers will commute from 'commuter estates' to their jobs outside the Borough and less skilled workers will commute into the area. This is not environmentally friendly. The position is made worse because both railway stations are in the centre of the town creating more vehicular movements.

Brownfield first

Brownfield sites near the town centre must be developed before green sites. The Council should do more to control this, otherwise in the early years, developers will go for easy-to-build homes on green sites, because they make more profit on these.

Infrastructure and Traffic

The new roads proposed will eventually open-up land for development. The plans for new road infrastructure to manage the impact of 2400 to 4200 additional homes in the South East Warrington Urban extension are inadequate which will put additional pressure on already congested existing roads. Although only 2400 houses are now proposed before 2038, the remaining 1800 houses could still be built before then.

There is no guarantee that the necessary infrastructure will be in place before houses are built.

Aspirational mass transit ideas are put forward but with no details.

There is no rail access to the proposed logistics site meaning that all goods would have to be to be carried by road so adding to the traffic and pollution.

Despite the comments of Council officers, I am not convinced that the business case for the Western Link Road still stacks up. I also doubt that the proposed funding for this project is sufficient. The effect on existing roads at either end of this Road is unclear.

Town Centre

A large number of homes are proposed for the town centre and this is welcomed. I am concerned that if Green Belt is released, then developers may be more interested in developing there, taking resources away from regenerating the centre. Housing density has been increased in the town centre but there may be scope for higher densities in certain areas such as Slutcher's Lane.

If the hospital moves to another site, then this would free up brownfield land.

Wrong business in the wrong place

The Council has retained the deeply unpopular Six56 employment area next to Junction 20. This would require 137 hectares of Green Belt release. Putting additional logistics sites next to an already congested motorway junction would be foolish. It wouldn't create jobs for workers who could afford to live nearby. It would create more traffic and compete with nearby Parkside in St Helens.

It would use a large area of land and create very few high-quality jobs because of increasing automation. We want this land to remain as Green Belt, but if it has to be designated for employment, far better for it to be a Green Science Park.

Congestion and Air Quality

More traffic generated by the developments will worsen air pollution. This applies particularly to the A49 through Stockton Heath where particulate pollution is close to World Health Organisation limits and at the top of Cherry Lane in Lymm due to the Six56 development.

Three Victorian swing bridges add to the problem as they restrict access to the Town Centre from the new homes proposed south of the Ship Canal.

Increased reliance on road traffic is inconsistent with the UK and the Council's climate change aspirations.

Air Quality is a material consideration in planning terms. The NPPF says, 'the planning system should contribute to enhance the natural and local environment by preventing new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution'.

Schools, Medical and Leisure

Development needs new schools, medical facilities, leisure facilities and shops. There are vague suggestions but none of these are guaranteed. More information is required on specific proposals.

They must be provided when any development takes place, not afterwards. The town's track record of providing timely health facilities is poor. Chapelford is an example of this.

Deliverability

The NPPF requires the Plan to be aspirational but deliverable. We do not believe that some aspects of the Plan are deliverable and so it is unsound.

Some money is available from the public purse but most of it would come from Section 106 / Community Infrastructure Fund sources provided by developers. The size of this pot is unclear.

There is a real worry that developers would put forward financial viability arguments to get out of obligations as time goes by. To repeat, housing without all the necessary physical and social infrastructure is totally unacceptable.

Climate Change

This submission is being completed at the end of the COP26 summit which has heightened the critical importance of this Climate Change. The Borough Council and many Parish Councils in the town, including Lymm, have declared Climate Emergencies.

The Plan must do much more to recognise the need for immediate action. The Plan does not set out how it is compatible with reaching net zero and the carbon reduction necessary to reach net zero and the emphasis on road traffic in particular is incompatible with those aims.

Village identity

Development in the wrong places will alter the character and identity of our villages. In the Vision for Warrington's future, it says that 'The character of Warrington's places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed'. This statement is in conflict with the effect of the Plan on several of our villages and settlements.

If Green Belt is lost, there will be more urban sprawl which will contribute to the loss of identity.

The lack of detail in the Homes England - South East Warrington Urban Extension proposal, which is much less detailed than the previous Aecom proposal for the Garden Suburb, gives little assurance that the semi-rural, village character of much of the area will not be lost.

Impact on habitats

COVID has emphasised the importance of natural habitats, wildlife and the countryside for our wellbeing. The loss of Green Belt makes the situation worse.

If green space is built on, trees should be preserved or planted nearby.

Saving Moore Nature Reserve is welcome.

Thelwall Heys

Thelwall Heys is outside the Lymm Parish boundary but is close by. It is an area of open land bounded by the Bridgewater Canal, the Trans Pennine Trail and the A50.

A 2004 Public Inquiry found that it should not be developed because it functions well as Green Belt. It was not part of the 2019 Plan but now it is proposed to build 310 houses there.

The area is much valued by local residents for its peace and quiet and environmental value. It should not be lost. Access to open space is beneficial to mental health.

Local knowledge backed up by many images, confirms that the area is prone to flooding during periods of heavy rainfall.

LYMM

Housing numbers and site locations

Earlier in this document I have argued for a reduction in the total number of houses required which would have a beneficial proportionate effect on the total numbers in Lymm.

The real demand in Lymm is for genuinely affordable housing and the mix of housing proposed does not meet this need.

The Lymm sites are said to make a limited contribution to the Green Belt based on established methodology, but I contend this is the judgement of consultants and open to challenge.

Rushgreen site

The positive aspect is that the development will include a new health facility with both Doctors' practices expected to relocate there.

The big negative is the increase in traffic on Rushgreen Road which is narrow in places and very busy. It is used by many HGVs and weight limits are often ignored. The narrow roads with buses, HGVs and cars passing each other are a safety hazard to pedestrians given the narrowness of some of the pavements. When the M6 is closed, traffic can be considerably worse. Safety on this road is already a major concern to residents.

The site is highly visible from the Canal and lessens the gap between the settlements of Lymm and Oughtrington.

The developer should be asked to consider constructing a foot / cycle bridge over the Bridgewater Canal to allow access between the village centre, schools and nurseries on the south side and the health centre and Sainsburys to the north.

Statham sites

The two sites are prominent when approaching Lymm from the west.

The northern site is close to the Grade 2 listed Statham Lodge and near to the motorway so giving rise to noise and air pollution issues.

If the southern site is developed the trees and hedges next to the public footpath and the pond near the Trans Pennine Trail must be retained.

There are general statements about the need for school places but could children be accommodated at Statham Primary School or would they have to be driven elsewhere?

At School start and finish times there is currently congestion problems on this stretch of road. Developments either side of the road would worsen these problems and worsen pollution.

Flooding is an issue in this area.

Infrastructure

At present it can be difficult for people commuting by car up Cherry Lane to gain access to the motorway network at Junction 20. Increased traffic will worsen this.

The new health facility on the Rushgreen Road site is welcome but the accessibility of the site to elderly people without their own means of transport needs to be considered.

References are made to contributions from developers to schools. Do we know that schools have the necessary capacity to cope with increased numbers of pupils?

Is there enough capacity in dental practices?

Is there enough capacity in the sewerage system to cope with increased capacity?

Both developments will be required to 'make a contribution towards the delivery of improved cycle links to employment opportunities in the Town Centre and the proposed employment allocation in South East Warrington'. It is somewhat unlikely that people will want to cycle up Cherry Lane and then over the roundabouts at Junction 20 to reach the logistics employment site!

Councillor Ian Marks

