

From: [REDACTED]
Sent: 10 November 2021 18:38
To: Local Plan
Subject: Local Plan – consultation response

Below is the text of my response to the latest updated draft Local Plan. I shall also be submitting these comments in writing by post.

I am writing to register my very strong objection to the revised version of the Local Plan which has been issued for consultation.

There have been some welcome changes in this revision e.g. proposed use of the Fiddler's Ferry site, but its overall premise – of large-scale house building, much of it on Green Belt – is unchanged and hence it remains unsound in my opinion. It would have a hugely negative impact on the Green Belt and green spaces, particularly in South Warrington. By the same token it would fail to address the regeneration of the town centre, which is desperately required.

Housing

As previously commented not enough housing is being proposed in the locations where it is most needed (e.g. in or close to the town centre, with easy access to good public transport links), nor would there be enough of the right type (affordable for local people, social housing, suitable for single people and first-time buyers). The Plan suggests that the town centre and other brownfield sites will be developed, but it does not mandate a requirement to prioritise regeneration and building on these sites ahead of any consideration of green spaces. This is a serious omission.

The housing numbers on which the Plan is based are unrealistic relative to anything that Warrington has ever been able to achieve in the last half century or more. They are also unnecessarily high: recent calculations suggest a smaller future population in Warrington than has been used for the Plan. This indicates that the growth forecasts on which the Plan is based have been overstated and need to be reduced substantially – they are well over what the Government methodology indicates, which in any case is not a statutory minimum that must be exceeded in order for a Plan to be acceptable.

Green Belt

This version of the Plan is unsound due to how much Green Belt it proposes to use to fulfil housing needs, particularly in the South Warrington area. This would have a highly damaging impact on the separate identity and individuality, character and distinctiveness of communities such as Stockton Heath, Appleton, Grappenhall & Thelwall, Stretton, Walton and Moore, particularly when considered alongside the proposals for economic development along the M56 corridor. It would destroy the character and distinctive nature of the area with its proposals for a minimum of 4,200 new homes (in addition to those already approved). In my immediate vicinity 310 houses are proposed on Thelwall Heys, which has special landscape character status as well as being in the Green Belt – not to mention its proneness to flooding, which will only become worse in future as the effects of climate change increase. If these proposals were to proceed, then the present essentially rural landscape and character of a large part of South Warrington would be irreparably altered for the worse.

The Council must take a much more proactive approach to promote the use of urban and brownfield sites first and foremost in the Plan, thereby preserving the Green Belt as much as possible. Not only would this preserve the setting and special character of the area, it would also assist in urban regeneration through the recycling of derelict and other urban land. Without such activities Warrington town centre will continue to deteriorate and become increasingly less attractive to residents and visitors alike.

Infrastructure

The Plan lacks credible detail about the infrastructure that the town requires already, and which would most certainly be required to support the stated growth ambitions. This is crucial in respect of transport, particularly given Warrington's geography with its location on the River Mersey, the Manchester Ship Canal (and to a lesser extent the Bridgewater Canal), and the major motorway and rail links that pass through the borough.

The Plan is particularly deficient regarding infrastructure in the areas of South Warrington where significant house building on Green Belt is being proposed, bearing in mind that current infrastructure in those areas reflects their essentially rural and undeveloped nature. It needs a lot more concrete detail about proposed improvements to roads, public transport and similar infrastructure, which would have to be delivered at the same time as the proposed new housing. Nor should such improvements be left to be provided by developers, who have a very poor track record of delivery in such respects. Not only is it extremely unlikely that there would be enough provision in their funding to deliver all that was required, but it would take a great deal of time, effort and expense to ensure that they did so. What is more there could be no guarantee of delivery, because under present planning rules developers can renege on infrastructure commitments previously agreed with relative impunity.

The Plan also lacks detail about infrastructure other than roads that would be needed for it to succeed. For example, there are no details of when and where the significant additional education, health and wellbeing facilities implied by the Plan will be built, or about how they will be funded. Again, this will require significant additional public sector investment, since they will not be provided courtesy of developers looking to maximise their profits.

Economic Growth

The Plan lacks a meaningful economic strategy for the town: it appears to assume that growth will result from the building of new housing. This is both spurious and contrary to the approach that other planning authorities are taking. There does not appear to be any significant catalyst for growth in the Plan, apart perhaps from warehousing and logistics. In particular the Plan proposes the removal of a very large area of Green Belt near the M6/M56 junction, which it states will be for large scale distribution, logistics and industrial uses. This will not drive large numbers of new, high-skilled, well-paid jobs in the future, particularly with the likely increasing use of automation and robotics. Moreover the Plan provides no details about access, transport improvements, green infrastructure and utilities: these are to be left to developers to propose in the form of a development framework, which is a sub-optimal approach.

None of the Plan's proposals would lead to significant regeneration of the town centre, which is desperately needed and is one of the Council's key policy objectives. Warrington would carry on becoming essentially a dormitory town, with a large proportion of residents choosing to travel to Manchester, Liverpool and elsewhere for work, shopping and leisure.

In conclusion, I accept that some development has to take place, and that a Local Plan is needed in order to control this. However, we also need to protect our environment, not threaten it with degradation or even destruction. Were this Plan to be approved it would have long term ongoing negative repercussions for the town (particularly its centre) and for the future landscape and character of South Warrington, because it would inevitably lead to a major and irreversible loss of valuable Green Belt and amenity. I urge the Council once again to withdraw the Plan and work with all interested parties to bring forward an alternative which is sound, deliverable and beneficial for the borough as a whole.

Yours faithfully,
Dorab Fox