



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

By email: localplan@warrington.gov.uk

12 November 2021

Dear Sirs

### **Warrington Local Plan**

It is my strongly held opinion that the Local Plan is unsound, unjustified and not fit for purpose, particularly in respect of the impact upon South Warrington. As someone who lives in the very centre of the proposed South East Urban Extension, I believe this will have a catastrophic effect on the area.

My thoughts are as detailed below:

#### **Greenbelt**

- The Local Plan has a disproportionate impact on South Warrington.
- 5% of greenbelt being released across the borough in one go is too much.
- There is massive local opposition to the Local Plan which has received an overwhelmingly negative response to date.
- There is no genuine justification for the release of land from the Greenbelt.
- Green belt release should only be contemplated when all other options have been exhausted.
- Assurances need to be given that brownfield land will be built on first rather than offering Greenbelt land to developers in an unjustified and unnecessary landgrab. This is a plan based on the desires of developers – not genuine need.
- There is no infrastructure in place in the green belt in South Warrington, so surely that land also cannot be delivered at this time?
- Releasing the land from Greenbelt will lead to a free for all where nothing is protected.
- Gigantic logistics hubs built on greenbelt will have a massively negative impact on surrounding areas. Access, transport, utilities and infrastructure are not in place and are reliant upon the developers to propose and implement.
- The Local Plan does not demonstrate the 'exceptional circumstances' for release of land from the greenbelt.
- Low quality, low paid logistics jobs in low numbers are proposed together with commuter homes which could be accommodated elsewhere. This does not constitute exceptional circumstances by any metric.
- There is an opportunity for WBC to redevelop and regenerate deprived areas, the town centre and brownfield land through investment whilst retaining the precious green belt resource – this is not being adequately explored.

#### **Housing need**

- The number of new homes to be built (816 per year) is higher than the most recent growth estimates for Warrington indicate. This suggests the volume of new houses is not justified.
- Houses in the South East Urban Extension will not be affordable and certainly will not be bought by local workers at the planned logistics hubs.
- There is no evidence that there is a shortage of available house for sale in Warrington compared to demand. The shortage, if any, is of social and affordable housing. This will not

be solved by building on the green belt which will comprise executive homes priced well above the local and regional average.

- We are in a period of great uncertainty as to the economy, population growth, technological advances, an environmental/ climate emergency and the implications of Brexit and the Covid-19 pandemic– setting an 18 year strategy at this point is wholly ill advised.
- Economic growth in Warrington is not a certainty and will not be achieved through building unmanned logistics hubs and houses for commuters to neighbouring cities (Manchester and Liverpool). Warrington does not offer higher paid, higher skilled jobs – this should be an area of focus for WBC.
- This is a developer led Plan with South Warrington green belt and communities being held out as a sacrifice.

### **Job creation**

- Proposed employment land is not backed by any meaningful economic strategy for Warrington.
- Low quality jobs with obsolescence inevitable and impending are all that is contemplated in the Local Plan.
- There is a lack of vision, ambition and imagination; surely the people of Warrington deserve better than just to be offered minimum wage/ zero hours jobs in appalling conditions in warehouses?
- Estimates of job numbers are inflated; logistics is even now being increasingly automated.
- Most inhabitants of the new houses will be working in Manchester and Liverpool – not Warrington.

### **Sustainability and environment**

- This Plan will have a catastrophic impact on the environment through the location, scale and type of the development intended.
- We are experiencing a 'climate emergency' and yet WBC's response is to propose the destruction of huge swathes of green space.
- This land is important for biodiversity – if the farmland is built on, where is it proposed that the many bird, mammal and insect species will go?
- Many species that will be decimated are protected or red listed (e.g. great crested newts and bats); I have not seen any proposals for their protection in the Local Plan
- It would appear that no meaningful environmental impact assessment has been carried out.
- The impact of 1000s of cars on air quality will be hugely harmful.
- There is no public transport provision in the Local Plan – no rail or tram links are contemplated or in fact possible in South Warrington.
- Warrington has some of the worst air quality in the country – there is no strategy to address this, only to worsen the situation.

### **Traffic impact and infrastructure**

- The plan relies on significant building of new homes and employment facilities across the borough, many away from the town centre. This will mean increased reliance upon roads and bridges which are frequently congested and over capacity.
- The huge negative impact of HGVs on the local and already inadequate road network is not considered in the Local Plan.
- 1000s more cars on the roads are inevitable as the Plan is entirely dependent upon the car.
- There are no train stations in South Warrington, and therefore no alternative mode of transport to the car.
- The Plan contains no clarity on road and other infrastructure – i.e. what is proposed, what it will cost, how it will be funded, when and how it will be provided. Will it be in place before the development starts?
- WBC has a history of catastrophic decisions and inaction in respect of infrastructure. This will be no different.
- There does not appear to be any detail around crossings across the canals/ Mersey. There are currently issues with swing bridges – how are the 1000s of further occupants of the new houses to get into Warrington.

- The South Warrington area is confined by a number of 'natural' boundaries: the M56, M6, the Ship Canal and the Mersey. The Local Plan contains no provision for facilitating exit points for the massively increased traffic within these boundaries.
- There is no traffic mitigation strategy.
- No realistic traffic assessments appear to have been undertaken.
- There is no assessment of the impact on local amenities, e.g. schools, GPs, hospitals; these are already overloaded and there is no detail how the extra burden on these will be managed.
- There is therefore inherent uncertainty about whether these aspects of the plan are deliverable and will meet assessed needs.

### **Character and identity**

- Villages including Grappenhall, Appleton Thorn, Thelwall and others have a special character and history, of which their semi-rural setting is a key element.
- The character, history and identity of the villages in South Warrington will be completely destroyed as they are subsumed into bland housing estates by unchecked sprawl.
- The villages will be reduced to nothing more than a single 'Disneyfied' street consisting of a pub and a church surrounded by bland anonymous housing with all historic and geographic context lost.
- The distinctiveness of Warrington and the character of its villages, communities and neighbourhoods will be destroyed by this Plan.
- Recently built housing estates (e.g. in Appleton Thorn) are ugly, out of scale and do not in any way reflect or respect the vernacular architecture of the areas.

### **Test of soundness**

- The Plan does not demonstrate sustainability. It will have a deleterious impact on air quality, the natural environment, cause massively increased traffic and hence congestion on the road network. There is no mitigation and no provision for public transport.
- The Plan is not justified. The South East Urban Extension is not required without an inflated assessment of housing numbers. The reasonable alternatives (brownfield first, the alternative housing number/ growth computations) have not been adequately considered. Evidence as to environmental impact, traffic, air quality etc do not appear to have been considered.
- The plan period of 18 years is unrealistic; it is at this point impossible to anticipate housing and employment needs for more than 5 years ahead.
- The Plan is inconsistent with national policy on sustainable development, the 'climate emergency' and the preservation of the green belt.
- The Plan does not adequately deal with the regeneration of Warrington town centre and arrears in need of investment and development. There are huge out of town retail parks in decline which also need to be addressed.
- There is no detail on how the infrastructure will be delivered – this cannot be left until after the logistics hubs and 1000s of houses are built.
- The Plan does not appear to be deliverable. Detail is flimsy at best with little detail and delivery of infrastructure seems to be entirely dependent upon the whims of the developers carving up the green belt. No public money is proposed to be available for infrastructure.
- There is no case made for release of land from green belt before brown field land has been developed. The Plan does not meet the criteria for release from green belt:
  - To check the unrestricted sprawl of large built up areas
  - To assist in safeguarding the countryside from encroachment
  - To preserve the setting and special character of historic towns
  - To assist in urban regeneration by encouraging the recycling of derelict and other urban land
  - To prevent neighbouring towns merging into each other

I can see no alternative but that the Local Plan is abandoned with immediate effect.

Yours faithfully

Alex Collier