



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

Ref: Response to the Updated Proposed Submission Version Local Plan 2021 (UPSVLP21)

Dear Sir / Madam

In response to the local plan public consultation, I wish to submit my responses and objections to the local plan as follows:

- 1) The consultation process itself is **unsound**, the vast majority of the greenbelt release takes place in the South East Urban Extension. All of the council run consultations sessions were held at the Halliwell Jones stadium north of the waterways divide. Consultation events run by the council with council officers present should have taken place in the south of the Borough as last time in venues such as the park Royal Hotel. The failure to do this renders the consultation process **unsound**.

Also note that paper copies of the response form were not available at either the new Times Square offices, contrary to the advice on the local plan website, or indeed non were available at the town hall. This lack of non-compliance with website advice which clearly favours an on-line response is in itself renders the consultation process **unsound**.

- 2) The case has not been made for the growth that is driving the increased housing numbers in the local plan. The 2018 ONS data predicts significantly lower growth for the town, in fact it projects a housing requirement of 458 homes per annum verses the plans 816 homes per annum. The Plan has not been adapted to take into account the latest data. Importantly the growth in housing numbers generated by the standard model is “not a target” but a starting point, this starting point should be amended to reflect the 2018 ONS data. Because of this failure to adapt the growth numbers driving the plans it signifies that the plan is **unsound**.

- 3) The case that is made for the green belt release is **unsound**. The Council appear to have used this as a target and then increased the numbers via further uplift of 10% generating a total requirement of 16,157 homes over an 18-year period.

The Plan, at point 4.1.10 of the document, confirms that Warrington has an urban capacity of approximately 11,800 homes that could be built on brownfield sites, the annual “target” pre the 10% uplift of 816 homes, which is considered to be un sound and excessive, implies that there is sufficient Brownfield land to support a 14 1/2-year building program. On this basis there is no need to release any greenbelt until sometime well beyond the first decade of this plan.

The priority of the Council should be renewal of the town centre and the development of Brownfield sites not release of the greenbelt., there is no need for greenbelt release for well over 10 years using the councils' own numbers if the Brownfield land available is remediated. The council has some £1.7Bn of borrowings much of which relates to investments. If some of these investments were realised the capital recovered could be put to local use in remediation of the Brownfield sites. The council's priority should be that of regeneration of the town centre and the Brownfield sites around Warrington.

In the early years of the plan an enhanced stepped approach to the building figures could be taken which would allow for only the available brownfield sites to be developed.

The wholesale release of Greenbelt land will have, as an immediate consequence of this plan, the effect of drawing development and developers to the released greenbelt rather than focusing attention and effort on the town centre and Brownfield developments and work contrary to plans to regenerate the town centre. The phasing of green belt release can be considered to be land banking and should only be released when necessary.

- 4) The Council have declared a climate emergency. The release of greenbelt is **unsound** in the face of the Council's own climate emergency, the government's own declaration of a climate emergency and the global desire to reduce greenhouse gas emissions.

When Brownfield land is available for use there is no sustainable justification for the release of greenbelt land. The release of greenbelt in the countryside surrounding the town and in particular the South East Urban Extension will create further car dependent suburbs, leading to further congestion, pollution thus negatively impacting the climate change agenda of the Town and the Country.

- 5) The plan is not sound in that it fails to address the already chronically overloaded road system in South Warrington. The bottlenecks of Stockton Heath, Latchford, junction 10 of the M56, Junction 20 of the M6, and London Road between Stockton Heath and junction 10 of the M56. The policies of MD2 transport and accessibility are **unsound**.

The limited contribution to the road network contained within the plan for the South East Urban Extension is a link road from Grappenhall Hayes to Dipping Brook Avenue with a connection to the existing road network near Grappenhall Lane and a connection of a link road from Stretton Road to the A49 somewhere opposite the Spire Hospital. These do not address any of the current issues of congestion rather it simply links areas within the already congested hinterland bounded by The Bridgewater Canal, the M6, the M56 and London Road.

- 6) The proposed new junction opposite the Spire Hospital has enormous potential drawbacks. If this is to be operated by traffic lights it would create a further worsening of the congestion that already sees vehicles backing up to the junction 10 of the M56. The implications of having traffic lights opposite the Spire and at the Cat and Lion will only increase the congestion on the A49 both northbound and southbound. This solution is **unsound**

The proposal that in the short term there is a potential to link the A49 opposite the Spire to Spark Hall close, is practically unworkable and will create further significant congestion at the junction of Stretton Road and Spark Hall close than it is now, opposite St Matthews Church and St Matthews school. This solution is **unsound**.

- 7) The plan for the SEWUE will significantly increase air pollution levels in the already highly polluted areas of Stockton Heath, Latchford and London Road. Any plan cannot be sound if it

that increases the unacceptable levels of air pollution already experienced in South Warrington. This is against the policy ENV8 and objective W6 and is therefore **unsound**.

- 8) The plan is **unsound** because it fails to grasp the opportunities and challenges of the 21st-century. The lack of sustainability of the plan is highlighted by the development of more warehousing facilities on greenbelt land at the 6/56 employment area. The plan for 6/56 fails to understand the potential scale for automation of warehousing facilities, the predicted jobs growth is unlikely to happen as warehouse companies automate their processes. The South East Urban Extension will create a huge suburb with connectivity issues to the town centre. The South East Urban Extension is likely to be of residential interest for those people working in Liverpool, Manchester and Chester, creating a commuter dormitory wholly car dependent and disconnected from the Town.
- 9) The Plan is unsound, it's building the wrong homes in the wrong places, Warrington needs affordable housing of mixed tenure but this affordable housing needs to be near to the town centre with the facilities of the town centre accessible to those living in affordable housing. The plan does not deliver this in fact its target for affordable housing is only 20% for inner Warrington developments and 30% elsewhere.
- 10) The plan is not sound and is unsustainable, given that the southernmost developments in the South East Urban Extension will be adjacent to the M56 exposing residents of that area to air and noise pollution.
- 11) The plan is **unsound** in that it will create material harm to the visual and residential amenity of those already living in Stretton, In particular it will destroy the current views afforded to those entering Warrington from junction 10 of the M56, a view currently across open fields towards Saint Matthews Church which gives the overall impression of entering a rural village environment. The proposed development of this greenbelt land will have the effect of creating a suburban feel the moment one leaves junction 10 of the M56. The release of this land is both unnecessary and damaging to the beauty of the current environment.
- 12) The plan is **unsound**. The opportunity to develop Fiddlers Ferry into a fully residential area is flawed. This location should not have a commercial employment area but rather a new village built on Brownfield land with sustainable links to the town centre and beyond. The plan as currently drafted fails to capitalise on the opportunities that present themselves to the council for Brownfield land residential use at Fiddlers Ferry. There are currently over 7 hectares of commercial and warehousing available space in Warrington which should be utilised in the first instance before creating new commercial provision.
- 13) The plan is **unsound** because it:
 - sacrifices the pleasant green spaces of South Warrington for no justifiable reasons,
 - it is harmful to the environment and unsustainable in the context of the climate emergency,
 - unjustified when looking at the 2018 ONS data for housing growth,
 - detrimental to the plans of developing the town centre,
 - detrimental to the remediation and improvement of brown field land,
 - contrary to the maintenance of distinctive and separate villages,
 - totally inadequate in terms of infrastructure to support in particular the greenbelt development,

- totally inadequate in terms of concrete proposals for the funding of infrastructure and services.

Conclusion

The plan appears to have one purpose which is the unjustified and premature release of greenbelt. A greenbelt that should be protected for the future generations of people living in Warrington able to enjoy the green spaces the people of Warrington enjoyed today.

To progress the plan now is unsound. Furthermore, given the government's latest announcements and Michael Gove's comments regarding the protection of the greenbelt and the ending of housing targets the plan should be withdrawn.

Yours Faithfully

[Redacted signature]

Mrs Carol Appleton

[Redacted address line 1]

[Redacted address line 2]