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12th November 2021

Dear sir / madam,

Response to WBC Consultation on the Proposed Submission Version of the Local Plan 2021

I am writing to set out my objection to the proposed submission version of Warrington's Local Plan which I believe is fundamentally flawed. My objection to the proposed local plan is threefold:

1. The plan is unsound

The assumptions of the amount of employment land and housing required in Warrington are inflated and the plan is excessively developer led.

The plan requires an average of 816 houses to be completed each year that between 2022 and 2038. In the last 30-years the average build rate was 732 houses per year in Warrington, falling to 550 per year in the last 10 years. Warrington has never delivered the level of housing growth proposed in this plan. The scale of green belt release is therefore unjustified and does not meet the exceptional circumstances test. If Warrington continued to grow at the average rate of the last 30-years, the homes required ($15 \times 732 = 10,980$) could be accommodated within the current urban capacity (11,785 homes). It is clear that the South East Urban Extension is not required and will result in green belt land being developed in preference to brown field sites. Furthermore, the plan includes a 10% uplift amounting to 1469 additional houses. Given the reported strong demand by developers for sites and the almost certainty that green belt sites will be developed due to their ownership by the Homes and Communities Agency, this is excessive. The removal of this uplift would reduce the amount of green belt released for housing by nearly one third.

The plan uses an optimistic 'policy-on' approach to employment land estimates. This leads to additional green belt release which WBC are not obliged under the NPPF to provide and which are not supported by Warrington residents. The economic growth predictions which form the basis of the plan are heavily reliant on ambitions set out in the Warrington and Cheshire LEP Strategic Economic Plan and by the Atlantic Gateway Partnership. Both are private sector organisations, heavily influenced by large property developers. This provides further evidence that the plan is excessively developer led.

The plan will result in a town ringed by large distribution centres (Omega, Six56) which will generally provide low skilled, low wage jobs which are at risk of loss through increasing automation. Such an approach will inevitably lead to increased congestion and reduced air quality. This is contrary planning policy objective W3 which aims to regenerate the town centre and provide high quality employment. More realistic forecasts have been systematically excluded from the plan

2. The removal of large amounts of land from the green belt does not meet the required 'exceptional circumstances' test

The plan is based on green belt assessments which are so flawed that they undermine the credibility of the plan. The green belt in south Warrington has been highly effective in preventing urban sprawl and preserving the special character and setting of Grappenhall village. Referring to the assessments carried out by Arup, Joanne Harding, Principal Planning Policy Officer at Halton Borough Council, in comments *"some of the language and sentence structures appear to be used specifically to confuse the reader.....The explanation of the proposed methodology is impenetrable"*. The results of the assessments are often baffling and suggest little knowledge of the local geography with obvious features such as canals, roads and woods being ignored or inconsistently used when assessing parcels of land. There seems to be a systematic bias towards assessing areas of land as 'weak' if they appeared in previous 'new town' plans or are currently owned by the Homes and Communities Agency.

The assessments fail to recognise Grappenhall village, Appleton Thorn, Stretton and Dudlows Green as distinct settlements and therefore do not give sufficient weight to the surrounding green belt's role in maintain their distinctive character. Nor do they give sufficient weight to the role of green belt in restricting ribbon development in General Area 10. The Arup methodology notes that land which is restricting the growth of ribbon development should be classified as 'strong' then systematically ignores this requirement in the general area assessments

3. The plan is undeliverable

The plan completely fails to recognise the unique constraints of the geography of south Warrington and provides no assurance that the resulting massive infrastructure investment can be delivered. The northern edge of the South East Urban Extension is bounded by the Bridgewater Canal and the Manchester Ship canal. The most direct access to a development of up to 4,800 houses will be across Stanney Lunt Bridge and Lumb Brook Road. Both are single track, historic canal bridges which are weight restricted and controlled by traffic lights.

WBC have consistently refused to acknowledge or investigate the effect of south Warrington's unusual geography and the Bridgewater canal crossings in particular, despite the availability of the Warrington

Multi-Modal Transport Model (WMMTM) which has been used to justify the omission of improved crossings of the Ship Canal. Predictions in that model show large number cars using these crossings during peak periods which will have unacceptable consequences for the Grappenhall Village conservation area, Appleton and for the road network surrounding these bridges.

Considering the various factors above, I believe the planned should be revised to lower the housing and employment land estimates to more realistic levels and the flawed green belt assessments should be corrected. Once that is done, a revised plan can be completed which will concentrate development on brown field sites and significantly limit the release of green belt land. Any green belt release in south Warrington should be accompanied by a realistic assessment of the impact of traffic at the various canal crossings and, if necessary, a funded commitment to provide the necessary infrastructure enhancements.

Your faithfully

Delyth Stow (Mrs)