


From: 
To: [Local Plan](#)
Subject: Objection to the Local Plan 2021
Date: 14 November 2021 20:22:43



14th Nov 2021

Dear Sir/Madam,

Re: Updated Proposed Submission Version Local Plan for Warrington (2021)

I would like to make the following comments in **opposition** to the latest version of the Local Plan.

Please find a summary of my points below. It is disappointing that Warrington residents have to repeatedly invest time to contest these plans which blatantly disregard the wishes of the local population through further unnecessary urbanisation of rural and semi-rural land. Overall, the plan is unsound for numerous reasons, and the revised version does very little to address the original concerns but also has its own new issues.

In summary:

<!--[if !supportLists]-->1. <!--[endif]-->Unnecessary use of Green belt land

<!--[if !supportLists]-->1.1. <!--[endif]-->**Green belt land and boundaries dramatically increase the attractiveness and desirability of areas that would otherwise be an urban sprawl.** Peaceful and attractive high quality agricultural land at Thelwall Heys is now being targeted despite not being included in the previous version. The plan contradicts and undermines some of the aims of the “Warrington Means Business” document through the planned targeting of green belt at Thelwall Heys and within Grappenhall. The Warrington Means Business document indicated that “*the Green Belt Setting*” and the “*link with the Green Belt*” which “*give Warrington a real distinctiveness and an enviable quality of life*” – this is true and the value of this should not be ignored for the sake of short-term greed. Once it is gone it can never be restored.

<!--[if !supportLists]-->1.2. <!--[endif]-->**Building on green belt land is not justified and there are no exceptional circumstances warranting this in South Warrington.** Green belt land was previously designated as such to secure it for the enduring future and it should only be built on in **very special circumstances**. This is not the case in Warrington, as there is plenty of brownfield land available to develop, and this is evidenced by numerous empty and underoccupied warehouses and some retail outlets that could far more effectively be transformed into residential premises within walking distance of the town centre.

<!--[if !supportLists]-->1.3. <!--[endif]-->The plan for the location of greenbelt release represents a **disproportionate burden for South Warrington**, with nearly 1000 of the 1400 acres that are being targeted coming from this region.

<!--[if !supportLists]-->2. <!--[endif]-->Local issues relating to Thelwall Heys and the rest of Grappenhall

<!--[if !supportLists]-->2.1. <!--[endif]-->There are significant and important mammal species within and around Thelwall Heys. This includes a **significant and thriving bat population** evidenced on summer nights feeding above the current fields. Importantly,

water voles have also been seen entering the water on the banks of the canal south of Pickering Bridge and it is likely they will be foraging within the adjacent fields that are targeted to become a housing estate. The timing of the plan release in late Autumn, and the surprise inclusion of Thelwall Heys has prevented any opportunity for these mammals to be catalogued appropriately. I am not aware that an appropriate wildlife survey at Thelwall Heys has been conducted prior to the release of the plan.

2.2. In addition to mammals, there are **numerous bird species** inhabiting the targeted green belt space in Grappenhall and particularly at Thelwall Heys. Many of these are common but still very welcome as they provide a haven of tranquillity with loud but relaxing birdsong in Spring and early Summer. Others that I have seen are of particular significance including pairs of yellow hammers, red kites and skylarks. These will undoubtedly be disturbed and likely lost from the local area if the land is developed.

2.3. Notably, tree felling started at Thelwall Heys in the few months prior to release of the plan. The further inevitable and **unavoidable loss of hedgerows, meadow, agricultural land and trees** to facilitate this development in Grappenhall and Thelwall Heys is completely at odds with current political direction and strategy at an international level. This is Warrington's own "kick in the face" to the campaigning younger generation who are rightly desperate to minimise global warming and protect ecological diversity. This typifies the arrogance and greed of local council town planners seeking the path of greatest income and least expense.

2.4. The area around Cliff Lane has minimal street lighting, allowing a "dark zone" haven for nocturnal wildlife. Planned residential properties and associated extra street lighting is likely to significantly **increase light pollution**, and potentially further disruption to wildlife and migratory birds.

2.5. It is **unclear what has changed** since Thelwall Heys was classified as Greenbelt 20 years ago, and also subsequently protected from development 15 years ago. Surely greenbelt should be safeguarded as a priority, while abandonment of existing buildings takes place in other areas of Warrington that were previously urbanised.

2.6. Thelwall Heys has historically attractive and important buildings that will be **completely out of context** and place if surrounded by the proposed development. These include the listed Thelwall Heys Hall and the Lodge, with the surrounding aspect and typically English meadow and hedgerows.

2.7. Thelwall Heys sits as an area of attractive agricultural land on the first approach to Warrington from the major M6 junction. This attractive approach **to Warrington will be significantly negatively impacted** and disrupt the current appeal provided by a green boundary.

2.8. **There is absolutely no justification for the Thelwall Heys development taking place as an early phase of the overall plan.** Not only has it only recently been included in a covert manner, but any use of greenbelt should be the absolute last resort, and after all brown field space has been utilised. There is no justification in the plan, for why this rapid approach is being considered.

2.9. All the farm owned green belt land in South East Warrington appears to be productively used for agriculture or farm animal grazing. This maintains **a crucial pleasant rural feel** to this part of Warrington which should be protected and enjoyed rather than ruined through exploitation. I believe this land is also considered to be of a particularly **high agricultural quality** with more than two thirds of it being considered Grade 1 or 2 quality. This is not useless, unproductive space.

2.10. The plans will lead to a decrease in physical exercise due to loss of pleasant outdoor spaces for recreational and fitness activities, together with the possibility of increased air and noise pollution. This will **have a negative impact on the physical and mental health and wellbeing** of residents and visitors.

<!--[if !supportLists]-->2.11. <!--[endif]-->Flooding regularly takes place on Cliff Lane, less than 150 yards from the planned development at Thelwall Heys. This has been reported numerous times, and resulted in a number of cars being written-off over recent years. In addition, the drainage ditch and brook that evacuate the surface rainfall runs through the area that is being targeted. This seems a concern with known likelihood of an increase in future flash flooding due to sporadic heavy rain.

<!--[if !supportLists]-->2.12. <!--[endif]-->Thelwall Heys and other Grappenhall development will lead to **worsening traffic** across an area that is already busy and occasionally dangerous. There is no detail about where **access roads will be located or what safety and traffic calming measures will** be introduced. Traffic volume and speed is already a significant danger at the main crossing point across the A50 from Cliff Lane, with the vast majority of cars speeding. This represents a significant danger to pedestrians, cyclists and other road users and will increase the background noise for local residents. Air pollution from increased traffic of all forms is increasingly correlated with negative health outcomes for the local community, which ultimately will increase the economic burden on local healthcare as well as decreasing the attractiveness of the area for newcomers.

<!--[if !supportLists]-->2.13. <!--[endif]-->Proposals for expanding lorry parks around the M6 junction 20 are dangerous and likely to significantly increase delays and make the roads more dangerous. The type and nature of the vehicles represent a significant danger to cyclists and other road users. Lorries are seven times more likely to be involved in fatal crashes on minor roads than cars as the size and weight of HGVs mean that they have a disproportionate adverse impact on the road network and other road users in terms of exposure to collisions, congestion and pollution (Ref: Campaign for Better Transport; Dec 2017).

<!--[if !supportLists]-->2.14. <!--[endif]-->The whole proposal represents a massive change in character for the local communities in Grappenhall. This is **short-sighted proposal that would lead to irreversible loss of identity for the area**. The current village has a sense of distinctiveness in terms of character and resident 'belonging' – this has been demonstrated by the huge local outcry to both the original and updated plans.

<!--[if !supportLists]-->3. <!--[endif]-->Unwanted and misguided strategic aims for the region

<!--[if !supportLists]-->3.1. <!--[endif]-->The overall plan is unsound and based on **outdated or inaccurate projections for housing need and population growth**. It also fails to clarify what infrastructure will be definitely provided, just vague and uncosted aspirations.

<!--[if !supportLists]-->3.2. <!--[endif]-->The provision of the suggested amount of new housing **is not sound and not the right strategy** for Warrington. There is inappropriate justification within the plan to indicate why this level of housing was chosen despite revisions.

<!--[if !supportLists]-->3.3. <!--[endif]-->Warrington should **remain limited in size and sprawl**, and not become part of a massive urban city corridor (from Liverpool to Manchester) across the North West of England. Instead it should aspire to being greener and proud of retaining its history, heritage and village identities.

<!--[if !supportLists]-->3.4. <!--[endif]-->Achieving the further population and aspirational economic growth is **not an appropriate course** for Warrington particularly based on its location between two attractive, successful and long-established major cities. The scale of the proposals within the document are also unrealistic and undeliverable.

<!--[if !supportLists]-->3.5. <!--[endif]-->Provision of land for businesses and employment will lead to increased influx of people and therefore increased demand for housing thereby **exacerbating any current shortage of housing** that the proposal claims to be addressing. This positive feedback loop will further exacerbate existing problems.

<!--[if !supportLists]-->3.6. <!--[endif]-->There appears to be unjustified economic growth assumptions based on old data and ambitious assumptions.

<!--[if !supportLists]-->3.7. <!--[endif]-->Increased emphasis on logistic and transport warehouses and developments **will not lead to significant employment opportunities** for the local population. These arguments are unsound as there is clear evidence for rapid progression to automation, at the expense of jobs, in this sector (“... *the industry’s most labour-intensive processes are on the way to being fully or partially automated...*”; Reference: Shifting patterns: The future of the logistics industry; PWC 2016; www.pwc.com/transport)

<!--[if !supportLists]-->3.8. <!--[endif]-->Resources and planning should instead be targeted to develop and regenerate the current confused and failing town centre with erratic, opportunistic, unattractive and inconsistent development.

<!--[if !supportLists]-->3.9. <!--[endif]-->The town centre is a victim of previous poor planning, and a **woefully poor transport infrastructure** that will always be limited by the network of canals and rivers. Provision of new roads will simply increase congestion nearer to the town centre bottlenecks and provide increased air and noise pollution elsewhere.

<!--[if !supportLists]-->3.10. <!--[endif]-->**Any housing/flats would be better placed within walking distance of the town centre** to reduce reliance on transport, promote cafes and pubs, and lead to regeneration within the town centre

<!--[if !supportLists]-->3.11. <!--[endif]-->WBC is **biased towards the potential financial benefits of any plan**, rather than the best interests of the community, through its business investments and commercial links. These have also not been openly and explicitly declared at an individual or corporate level.

<!--[if !supportLists]-->3.12. <!--[endif]-->Local infrastructure needs in relation to **hospitals** and schooling, has not been soundly and adequately addressed. The plans are vague and with no evidence of how the associated substantial costs will be met.

<!--[if !supportLists]-->3.13. <!--[endif]-->The wider network of roads is already unable to cope. **Development around the periphery of Warrington will be attractive to commuters hoping to work in Manchester or Liverpool** and lead to increased demand on the M6, M62 and M56 which are already completely unable to cope with capacity during commuting hours, during peak travelling days, and in the event of any accident or disruption.

<!--[if !supportLists]-->3.14. <!--[endif]-->WBC have a history of withdrawing services and having insufficient money to complete proposals as stated. I do not believe that any **realistic or secure source of income** has been proposed (let alone guaranteed) that would facilitate the overarching infrastructure. The overall plan is unsound and undeliverable. Based on previous historic developments within Warrington it is likely that the revenue generating housing and industrial developments would proceed but the required infrastructure development would be neglected as it would transpire that it was then too expensive and no longer a necessary priority.

<!--[if !supportLists]-->4. <!--[endif]-->Inappropriate Consultation Process

A duty of fairness which has not been respected in relation to the local plan:

<!--[if !supportLists]-->4.1. <!--[endif]-->The consultation meetings took place in inaccessible town centre locations and over a short duration before awareness had been raised. This was despite significant previous representations at local village centres in the past. Public meetings **were not held in key areas affected** (e.g. Grappenhall) thereby limiting opportunities to engage in the process. On this occasion every effort seems to have been made to minimise public consultation in these areas actually affected. As a

resident of an area targeted for a massive new housing estate, members of the household have not received a letter relating to this plan. In addition, the timing and the **unexpected inclusion** of Thelwall Heys means that it has not been possible to acquire evidence to support a balanced and carefully thought through response to all aspects. It also transpires that the local community and parish council were not involved in the inclusion of Thelwall Heys, though it is believed that discussions have been taking place for significant time with the landowner. This is a cynical attempt by the council to bypass any informed discussion and minimise the opportunity for the residents to provide an appropriate response.

<!--[if !supportLists]-->4.2. <!--[endif]-->There is no information on **how objection points and concerns will be collated and catalogued** to ensure that where multiple concerns exist these will be included, considered and addressed individually.

<!--[if !supportLists]-->4.3. <!--[endif]-->The document was **very lengthy, confusing and contained significant jargon** and terminology that was unfamiliar to those not involved with planning. Evidence was lacking in relation to Thelwall Heys, and arguments and justifications were wordy and weak.

Please do not miss an opportunity to act on the views of your local population and safeguard Warrington's future by preserving what remains of its attractive landscapes and historic local villages. Do not lose the little remaining character, charm, and distinctiveness that this town holds. Do not remove the tranquil and beautiful space that is currently available for future generations to enjoy.

Yours faithfully,

Rob Oliver

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