

Local Plan - Planning Policy and Programmes

Warrington Borough Council

New Town House

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## **RE: Proposed Revised Local Plan**

I wish to object to the proposed Revised Local Plan for the following reasons:

### **Greenbelt**

#### **Purpose**

- To check the unrestricted sprawl of large urban areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and specialist character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land

In my view, the local plan goes against all 5 points above.

- Weakness in the Greenbelt assessment – much of the land to be released is successfully used for agricultural or dairy farming. Production of local produce should be encouraged to retain jobs, skills and reduce unnecessary transport costs and pollution associated with sourcing produce from other UK areas / abroad.
- Biodiversity – we need to be protecting our natural environment not destroying it. The environmental and ecological impact of the loss of Greenbelt will be massive. This least sustainable form of development swallows up farmland and wildlife habitats while increasing air pollution, flood risk and car dependency. There are several historic trees and pond areas in the planned Greenbelt area to be used and the value of these to the local area has been undervalued.
- Climate Emergency – with the recent agreement at COP26 and the government's repeated message that greenbelt should be protected, how can the reduction of Greenbelt on this scale support this?
- Area of Greenbelt release – large areas are planned for release for development (approx. 1400 acres). There is still uncertainty over the number of houses and employment areas which are needed, therefore I don't feel the release of this scale of greenbelt is justified.
- Brownfield first – there have been no exceptional circumstances demonstrated to justify the loss of this massive area of Greenfield to housing. All Brownfield sites should be exhausted before Greenbelt is considered. The plan fails to demonstrate that Brownfield sites (such as the town centre and Fiddlers Ferry) will be developed before other Greenfield sites such as Thelwall Heys.
- From the CPRE: 'When protected countryside is released to developers, it's not low-cost housing they build, but executive homes for the wealthiest. 84% of homes built on Greenbelt in recent years have been for the middle or top end of a market that is already unaffordable for most people unless they already have access to existing housing wealth. Misguided calls to build on Greenbelt result in millions of people losing valuable access to countryside without doing anything to tackle the housing shortage'.
- Employment area – a large part of the loss of Greenbelt would be to logistics sites (Six56). Again, there are no exceptional circumstances to justify this. The jobs would be low paid; workers would have to travel from outside of the area, contributing to pollution and congestion. What other vacant industrial sites in the Warrington area have been considered? Any access, transport improvements, green infrastructure and utilities are not defined and will be left to the developers.
- Impact on people - the Greenbelt is the 'countryside next door' for many people in the whole of Warrington and the surrounding area. Its fresh air and open spaces make it fundamental to our physical health and mental wellbeing. Where will all the people go to relax and exercise?

- Longevity – the Greenbelt boundary was only confirmed 7 years ago in a plan which was supposed to last 20 years. This highlights the problem with trying to plan that far advance – how can we trust what the plans say about Greenbelt release?

## Air Pollution & Congestion

- Warrington has been named and shamed by the World Health Organisation for breaching air pollution safety levels. The town is one of 40 places in Britain and Ireland that has breached the WHO's safe levels PM2.5. WBC has said itself in its Air Quality Action Plan “we have estimated poor air quality causes approximately 145 premature deaths per year”. A Warrington Councillor said “*Warrington Borough Council takes its responsibility for the health and wellbeing of its residents extremely seriously. “We remain determined to tackle the causes of ill health in the borough and that includes air pollution – to this end we have a comprehensive network of sampling sites which form part of a national monitoring programme”.* By allowing the Six56 application to go ahead, this would be adding thousands more HGVs to our roads, only exacerbating the issue.
- There has been no serious analysis of air quality impact of these developments.
- The employment area development is proposed to facilitate distribution access to the M56 and M6 motorways. Junctions 19-21 of the M6 and junction 9 of the M56 are already heavily congested beyond their capacity which causes daily standstill traffic. Gridlock of the motorway network ripples onto the trunk road network resulting in congested traffic on the A50 Knutsford Road and other roads, exactly the area around the Six56 development.
- During a WBC consultation, the following areas we highlighted as having major congestion issues: Stockton Heath; Knutsford Road; Thelwall; Grappenhall; A50; Chester Road; Lymm; and the A49. No improvements to the infrastructure are being suggested in the plan other than improvements at the motorway junction.
- Increasing the reliance on road traffic is inconsistent with the UK's Climate Change plans.

## Housing

- WBC has said that Warrington needs to build 816 houses per year until 2038. This number is higher than have ever been built before and more recent calculations suggest a lesser number is required. Therefore, I feel this is not justified.
- The plan is unsound as it is only expecting a maximum 30% of the houses being built to be affordable. Given the high house prices currently in south Warrington it does not address the true need for affordable homes for both older and younger people in the town.
- Any new houses in the south would be far away from public transport including stations which would require even more car use.

## Economic Growth

- The development of Warrington does not appear to be taking into consideration the development of the surrounding areas in Manchester, Liverpool, and Cheshire.
- The growth predictions are unrealistic and based on development rates which have never been achieved before.

## Town Centre

- A key part of the development rules is that new plans shouldn't make existing areas decline. Warrington has seen a lot of out-of-town shopping, drawing customers away from the core, e.g., M&S closed their town centre store in favour of its bigger branch on the outskirts. This type of activity has several disadvantages. People using public transport or living in the town centre are deprived of choice. It discourages shoppers from the centre and the remaining businesses. It encourages more car use. It increases the traffic on the surrounding motorways as people go round the outside. It uses much more land. Each out of town development has separate, free and often underused car parks, rather than sharing the same ones. Warrington already struggles to fill its town centre shops and the new plans will just make that worse.
- Warrington is largely low rise. This is very inefficient use of land and unsustainable. It doesn't encourage people to live and work in the centre and/or use the train to commute. The south of Warrington has poor public transport links and increasing buses would not make commuting via the town centre much more attractive.

## Infrastructure

- The infrastructure of Warrington and in particular South Warrington is already stressed to capacity and further development will result in serious pressures on roads, public transport, GPs & Warrington Hospital which is already under immense pressure. There is no clarity on how any of the required infrastructure changes will be funded.
- The existing crossing points across the MSC and Bridgewater Canal are already heavily congested daily and any disruption, accidents, or lane closures on the M6 result in traffic trying to rat run through Warrington adding to the congestion over the swing bridges. There is no plan for a new route into town and the Local Plan still relies on these 3 Victorian bridges (which are in a very poor state of repair).

## Thelwall Heys

- Agricultural land – a 1995 DEFRA survey stated that 68% of it was grade 1&2 and 31% grade 3a. This compares to 15% of grade 1&2 in Cheshire and 20% across England. Therefore, the land should be protected.
- Special Landscape Character status – a 2004 WBC appraisal identified Thelwall Heys as a special landscape character status due to the landscape of pasture, hedgerows, and mature trees. This is still the case. Thelwall Heys is a grade 2 listed building and developing around it would destroy the appearance of this important building.
- Wildlife / Environment – a 2004 environmental survey at Thelwall Heys identified 32 different bird species, several of which were deemed to be 'red' status. No similar ecological survey has been carried out for the local plan. Ponds and important water life also exist at the site, so these, along with mature trees / hedgerows would also be lost forever.
- Greenbelt – this site was put into the Greenbelt in early 2000s and in 2006 developers attempted to overturn this decision which was rejected by WBC. What has that view changed?
- Flooding – this area already regularly floods and often all surrounding roads are impassable. If Thelwall Heys were to be developed, there would be nowhere to surface water to go, which drains naturally across this area to the River Mersey.
- Access – access to Thelwall Heys would have to be from the A50 / Cliff Lane. In April 21, data collected from police monitoring of the A50 at the Grappenhall junction showed that of 6500 drivers in a 24-hour period, 92.4% were speeding. The highest speed recorded was 80mph. Based on the assumption that 310 houses at Thelwall Heys would mean an extra 600+ cars in this area, I believe this poses a huge safety concern.
- Mental / Physical Wellbeing – the area surrounding Thelwall Heys (Bridgewater Canal & TPT) is heavily used by local people for exercise and relaxation. Building on Thelwall Heys would dramatically change the openness of the area and the feeling of countryside which has been so valuable to everyone during the pandemic.

I believe the local plan is fundamentally flawed, unsound and is undeliverable. As a committee member of the Weaste Lane Area Residents Association I have talked to many residents about the plan, and I do not feel it represents the wishes of any residents in south Warrington.

Regards

Joanne Rawlinson

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