



14th November 2021

Dear Sir/Madam

Submission to the Local Plan Consultation

I am writing to strongly object to the proposals contained in the latest version of the Local Plan. Overall I do not believe this Plan is sound. Given the Town's history of a failure to develop infrastructure to support earlier development, or even to build the numbers of houses it is claimed the town needs each year I do not believe this Plan is deliverable.

I recognise that Warrington needs a Local Plan but this has to reflect the needs of the town and its population both now, and in the future, there remain many uncertainties and major issues that need to be overcome by this Local Plan including addressing sustainability and environmental factors such as air quality and climate change. I do not believe the draft Plan does this and has therefore cannot be justified in its current form.

Major Concern 1 - Lack of Infrastructure

The Plan focusses on the building of new homes and employment facilities across the Borough the majority of which appear to be some distance from the town centre. The maps provided by WBC are poor with little reference to existing landmarks and no reliable information is provided about how the infrastructure around new construction will be either put in place or funded. Without carefully funded and future proofed transport infrastructure, that does not simply increase the requirement for car use across the town, the Local Plan cannot be justified. As it stands the Local Plan will mean an increased reliance upon roads and bridges that are already congested and over capacity. The scale of building suggested will undoubtedly increase congestion and result in poorer air quality at a time when the town should be focussed upon development that will have long term environmental viability.

The Local Plan provides very little information about how education, health services or reliable public transport will be developed or funded. This suggests that there has been a significant failure by WBC to establish objectively assessed needs for the town and to develop strategic Plans to meet these.

This leads me to question how a Plan with so many uncertainties can be considered deliverable. The evidence for this conclusion is clearly documented in the Plan e.g. a) the requirement for developers to develop an infrastructure master Plan for the Waterfront and its reliance upon delivery of the Western Link. b) the requirement for extensive highways and transport improvements that are currently unquantified at Peel Hall and c) the necessity for a Plan to be prepared by landowners at Fiddlers

Ferry to overcome existing issues with transport and community infrastructure. The lack of this critical information further confirms the unsoundness of the Local Plan.

The Plan also suffers from a lack of consistency related to the need for infrastructure between the different proposed areas for development e.g. The waterfront (1335 homes) has a centre with undefined health facilities, the South East extension (4200 homes) contains no reference to health services, Peel Hall (1200 homes) “may” have health services “, but these will be off site” and at Fiddlers Ferry (1760 homes) there is a suggestion in the Plan that space for a potential GP branch surgery will be allowed. These levels of uncertainty about such key services question how deliverable the Plan will be, demonstrate it is not justified and show the lack of work to appropriately assess needs.

This Plan cannot be justified due to the significant uncertainties about how infrastructure will be funded or when it will be developed in relation to any of the Planned developments.

Major Concern 2 - Housing Numbers, Employment Land and Greenbelt

I believe the Plan’s predicted growth and therefore both housing numbers and proposed extent of employment land cannot be justified. The number of new homes proposed is higher than the most recent predicted growth estimates for the town. Use of the 2014 population figures as per the NPPF is not appropriate and should be replaced with the most recent available, as well as making adjustments for changes linked to BREXIT and the impact of Covid 19. The lack of uncertainty about the impact of the Government’s recent statement that Greenbelt should not be built on also challenges the justification of housing and employment land use contained in the Plan.

For these reasons the numbers for new housing in the Plan are unsound as they cannot be justified and have failed to demonstrate assessed needs. The Plan also fails to recognise that the numbers proposed to be built per annum are higher than has ever been built before questioning the deliverability of the Plan.

A further aspect of concern about housing is the apparent lack of any scheduling within the Plan that would result in the use of brownfield sites such as the town centre and Fiddler’s Ferry being redeveloped before prime agricultural land, and Greenbelt is released. Given environmental factors, the need to ensure that future living in the town is less reliant upon large numbers of people needing to move across the town, thereby generating congestion and poor air quality the Plan cannot be justified without enshrining the principle of brownfield redevelopment first.

In addition to the unjustified use of Greenbelt (currently 1400 acres) without having appropriately assessed the actual need for housing and employment space suggest that the Plan has not been positively prepared. When reviewing available employment space within the town it is clear that there are high vacancy rates. This suggests that taking 130+ hectares of land for employment within the Plan cannot be justified.

The proposed Plan proposes the removal of a large area of Greenbelt at the M6/M56 junction – commonly referred to as 6/56 and that it will be used for large scale

distribution, logistics and other industrial uses. This cannot be justified due to the loss of Greenbelt; how does this differ from Stobarts that the Planning Inspector refused? The Plan also fails to quantify or provide information about how access, transport improvements, green infrastructure and utilities will be provided. It is inappropriate to state, as it does in the Plan, that the developers will propose a development framework. This questions the deliverability of this element of the Plan and the extent to which needs have been assessed. The Plan also lacks detail about the types of employment opportunity that will be available in this part of town but logistics and distribution suggest low skilled low paid work that will mean the work force is likely to need to travel across town or from outside areas. This will place further pressure on traffic and air quality and cannot be justified.

Major Concern 3 - Health and Well Being

The Plan's failure to support delivery of WBC's own Health and Wellbeing strategy demonstrates how it has not been positively prepared or justified. To quote:-

"To be a healthy town, our environment and infrastructure must protect and promote good health and wellbeing considering issues such as air quality, active travel and access to parks and green spaces."

- "Parks and green space, leisure, culture and community provision, alongside walking and cycling opportunities, all play a key role in promoting health and happiness."
- "Evidence shows multiple benefits from quality green space, including improved air quality and less noise pollution. Healthy green places increase social interaction and reduce antisocial behaviour, isolation and stress; improving mental health."
- "Considerations about future growth must ensure adequate provision of quality and accessible green infrastructure. Opportunities to protect and improve parks and incorporate community gardens within urban areas need to be maximized"

The Plan fails to secure delivery of these important factors and is not justified.

Major Concern 4 - Thelwall Heys

Thelwall Heys has **Special Landscape Character Status**

In 2004 WBC itself commissioned a landscape appraisal of Thelwall Heys. You referred to this in your submission to the Thelwall Heys public inquiry. Your report identified Thelwall Heys as a landscape type worthy of special landscape character status due to its small-scale landscape of pasture, hedgerows and mature trees. At that time WBC deemed the area to be distinctive from other surrounding areas. The Plan fails to make a case for removing the Special Landscape Character Status. One important factor here is that the area was deemed to be distinctive from other surrounding areas. Given this information it does not seem that the removal of Thelwall Heys from the Greenbelt and future development cannot be justified.

The Thelwall Heys property is Grade 2 listed. I note the Heritage report that has been compiled in relation to Thelwall Heys. Whilst this suggests a number of approaches that could be used to mitigate the impact of building on the site.

I understand that there are **historic restrictive covenants relating to Thelwall Heys that preclude development** and that there is not clarity that these have been removed. I understand too that the current land owner has entered into agreement with a developer which are timebound and which will reduce payments to the land.

owner if development is not started within the next 2-3 years. Is this the real reason why Thelwall Heys has now appeared in the Plan?

Access

Thelwall Heys sits between the A50, Stockport Road, the Trans Pennine Trail and the Bridgewater Canal. Access to the site would be severely limited and would most likely need to be via the A50/Cliff Lane. It is shocking that the Plan does not appear to have considered this important factor. In April 21 Cheshire Police monitored the A50 at the Grappenhall junction for a number of days as part of their ongoing work to reduce dangerous speeding. The data published by the Police showed that in a 24 hour period of the 6500 road users **92.4% were speeding** (speed limit 30). Over 3000 vehicles were travelling at between 40 & 50 mph and **over 2000 between 50 and 60mph**. The highest speed recorded at 80mph. This suggests that access into Thelwall Heys for 600+ vehicles a day would pose a significant safety concern, particularly as no information has been given in the Plan about how any road reconfiguration would be funded. This suggests a lack of both justification and deliverability.

Flooding.

Documents compiled during the time of the Planning inquiry in 2004 confirmed that surface water from other local areas (Appleton Thorn and High Legh) naturally makes its way towards the Mersey by **flowing along water courses that include Thelwall Heys**. The Thelwall Heys area frequently floods with significant volumes of surface water and overspill onto local roads. Cliff Lane for example is frequently closed by WBC due to flooding. Should Thelwall Heys be built on there would be nowhere else for this water to go and there are significant concerns that flooding in the area would increase

Surveys completed around the time of the public inquiry suggested that if drainage at Thelwall Heys were improved to allow development there could be a danger of land elsewhere in Thelwall drying out resulting in potential for subsistence.

Agricultural land.

In 1995 MAFF surveyed the land at Thelwall Heys. Its report that 68% of the land was top quality Grade 1&2 and 31% of it Grade 3a. At the same time in Cheshire only 15% of land was graded at levels 1&2 and 20% across England. The proposed use of this prime agricultural land in the Plan cannot be justified, particularly as with global warming and the need to reduce food miles should be protected.

Wildlife and the Environment.

In 2004 environmental surveys of Grappenhall Heys found 32 different bird species present at Thelwall Heys including several who at that point were deemed to be of high importance due to their "red" status. These included Grey Partridge, Skylark, Tree Sparrow, Linnet, Yellowhammer and Reed Bunting. A number of these were found to be of county importance. The 6 week consultation period has not allowed for this assessment to be repeated but there is no confirmation that Thelwall Heys contribution as a habitat for endangered birds has changed.

Ponds at Thelwall Heys were also surveyed at this time where rare water life, including beetle species, were found. The environmental report very clearly stated

that if the site was developed these habitats would be lost along with their inhabitants.

Development of the site would result in the loss of a large number of mature trees and historic hedges which are important

Greenbelt.

In recognition of the important contribution it made to the reduction of urban sprawl and maintenance of openness the Thelwall Heys site was given Greenbelt status in the early 2000s. In 2006 developers tried to overturn this decision. WBC defended the Greenbelt at Thelwall Heys vigorously at that time, how can this change now be justified as its development would destroy the character, openness, landscape and ecology of this important site that sits between Stockport Road, the Bridgewater Canal and the TPT. In so doing it marks the end/beginning of urban development on the South East corner of the borough for people leaving or arriving via the M6.

The Plan says that building on Thelwall Heys would not have a material impact upon the Greenbelt in the area but this overlooks the contribution it makes as a “special landscape” and the fact that it these facilities are highly valued and well used by local people for recreation and exercise both, of which are important for physical and mental well-being. Throughout the Pandemic this area was extensively used by local residents for their permitted exercise. This area is a very important amenity for local resident’s especially given the recent and proposed loss of land between Grappenhall and the Walled Garden as well as Stockton Lane.

Mental and Physical Wellbeing

The building of houses on Thelwall Heys would fundamentally alter the outlook and ambience of this area. The section of the Bridgewater Canal between Grappenhall and Lymm is one of the last portions that sits in “open” countryside and is not overlooked by urbanisation. Building on Thelwall Heys will result in the loss of open green space that is enjoyed by people using the canal and TPT and which has been enjoyed by so many during the pandemic.

Due to the lack of information in the Plan about how site preparation and infrastructure would be funded this proposed development has not been justified or its deliverability demonstrated.

This consultation response has provided numerous reasons why there a significant concerns about the soundness of this Plan and I would urge that you consider again how they can be overcome.

Yours faithfully

Sally Chisholm