

[REDACTED]

From: Bill Kidley [REDACTED]
Sent: 15 November 2021 16:09
To: Local Plan
Subject: Warrington Borough Councils Consultation on the Local Plan

Dear Sir/Madam

I refer to WBC's current consultation on the draft Local Plan.

My belief is that the current draft of the Local Plan is not sound for the reasons in my objection.

1. The consultation itself was not sound in that as the vast majority of the greenbelt affected is in the South East Urban Extension (SEUE) yet all the councils consultations were held at the HJ Stadium in the north off the town, none were held in South Warrington the area most directly affected by the SEUE. Council officers should have been available at venues within this area to meet with those residents who will be impacted the most by the proposed Local Plan.

The failure of WBC to do this renders the consultation process unsound.

2. The 2018 ONS data predicts significantly lower growth for the town, it in fact projects a housing requirement of 458 homes per annum against the plan of 816 homes PA.

The Local Plan has not been adapted to take into account the latest data. The growth in housing numbers generated by the standard model are a starting point and "not a target" and as such the the starting point should be amended two take into account the 2018 ONS data.

As a result of failing to adapt the growth numbers against the 2018 ONS data then the plan is not sound.

3. In terms of the case made for the release of the green belt it is not sound. In the case of WBC The Plan refers to an annual target whereas Christopher Pincher MP (Housing Minister) in Parliament on the 2nd March 2021 he stated the "standard method for assessing local housing needs is only the starting point in the process of planning for new homes and it is not a housing target".

WBC appear to have used this as a target which they have then increased the numbers by a further 10% which generates a total requirement of 16,157 homes over an 18 year period.

The Plan point 4.1.10 of the document confirms that Warrington has an urban capacity for approximately 11,800 homes that could be built on brownfield sites. This suggests that

the annual target prior to the 10% uplift of 816 homes means that there is sufficient Brownfield sites to support 14.5 years program of building.

This suggests that there would no calls to release Greenbelt land for at least 10 years.

The councils priority should be to renew the town centre by using empty retail units to facilitate a change of use for housing and the development of Brownfield land not releasing Greenbelt for development.

The council by releasing Greenbelt immediately will draw developers away from development and focus of town centre regeneration and Brownfield developments and work against plans to develop against those aims. By using a stepped approach to the building figures this would allow only available brownfield sites and the town centre to be developed.

4. The plan fails to address the already overloaded road network in South Warrington, there are existing bottlenecks already in Stockton Heath, Latchford, Grappenhall, the M6 at J20 and J10 of the M56 as well as the A49 at J10 through to London Road at Stockton Heath. The plan for for SEUE mentions a link road from Grappenhall Heyes to Dipping Brook Avenue with a connection to the existing road network near Grappenhall Lane and connecting link road from Stretton Road to the A49 close to the Spire Hospital. This limited contribution to the road network does not address any of the current congestion issues it will in fact exacerbate the situation if the SEUE is approved.

The proposed new junction near Spire Hospital will simply increase the traffic issues especially if controlled by traffic lights this will cause further worsening of the already congested which backs up to J10 of the M56. New lights at the Spire along with the existing lights at the Cat & Lion will only increase the congestion on the A49 in both directions.

The proposed development of the SEUE plans to create 4200 houses which will rely heavily on cars for transport to & from the town centre and to the local amenities in Stockton Heath which is the main shopping & leisure hub in South Warrington, there are vague promises of a public transport system to support the plan however the current public transport system fails so are we to believe that WBC are able to improve it sufficiently to service this growth given they are already complaining they cannot recruit sufficient drivers.

Stockton Heath already has insufficient parking for cars and this proposed development will add to this issue and lead to more on street parking in already congested roads which in turn will put pedestrians at a greater risk of coming into contact with traffic and causing potential harm to the pedestrian. For the reasons stated above my belief is that the proposed Local Plan is not sound.

5. WBC have declared a climate emergency, the release of greenbelt is not sound in the face of the Council's own climate emergency, the governments own declaration of a climate emergency and the global desire to reduce greenhouse gas emissions.

When there is Brownfield land available for development there is no sustainable justification for releasing Greenbelt land on the outskirts of the town, the release of Greenbelt in the countryside surrounding Warrington and in particular the SEUE will create further car dependant suburbs leading to further congestion, pollution and will have a negative impact on the climate change agenda of the town and the UK.

As the SEUE has no provision for any form of mass transport other than motor vehicle's and the vague promises of public transport systems that along with the topography of the area that is planned for the SEUE makes a realistic alternative to the car almost impossible for journeys to and from Warrington and to and from places of employment.

The south of Warrington has three water barriers which in effect cut it off from the services in Warrington and without any proposals to provide an alternative for crossings of the River Mersey and the Bridgewater & Manchester Ship canals this along with the already congested roads in South Warrington then residents will be inclined to use leisure and retail facilities in Manchester, Chester, Liverpool and Cheshire Oaks, these areas already offer better facilities than Warrington and are short journeys away using the M56 rather than the congested road network through the villages.

The villages that have bridges as a means of access to and from town already suffer from pollution from motor vehicles on congested roads in particular when there is shipping on the Manchester Ship canal, this will only worsen with the expected increase of boat movements which Peel Ports have already indicated this along with an anticipated minimum of 4200 cars as a result of the SEUE will worsen air pollutants in those villages resulting in a rise in health conditions to residents.

As the For the above reasons I believe this Local Plan is not sound.

6. The Local Plan sets aside a proposed employment area which covers a vast stretch of the greenbelt the council claim this will lead to increased employment for residents in the Logistics sector which is currently going through a period of change due to Covid and Brexit. With the regards to the type of warehousing being proposed the councils figures for employment I believe the councils potential employment figures are vastly exaggerated, I have recently left the Logistics industry after 39 years and those warehouses are far more likely to be semi or fully automated and rather than dependent on manual labour.

As someone who has worked in this area most of that labour will live outside Warrington and commute in from neighbouring towns not only will the fit into the low paid bracket it will bring extra traffic with it.

They claim that by putting the 656 employment area between the junctions of J20 of the M6 and J10 of the M56 it will have little or no HGV traffic movement through the surrounding villages this will not be the case. The M6 in particular has a history of closures around the Thelwall Viaduct and from J18 to J22 caused by RTA's or high winds on the viaduct which result in closure bringing traffic of the M6 and through our villages in order to get around the closure, this causes major gridlock not only to the villages but to the road network through Warrington and adding to the already high levels of air pollution.

In concluding the Local Plan is not sound as it fails in particular with the release of greenbelt to support the economy of the town, as the residents of South Warrington and the planned SEUE because of the three water barriers which in effect cut it off from the services in Warrington and without any proposals to provide an alternative for crossings of the River Mersey and the Bridgewater & Manchester Ship canals this along with the already congested roads in South Warrington then residents will be inclined to use leisure and retail facilities in Manchester, Chester, Liverpool and Cheshire Oaks, these areas already offer better facilities in particular parking than Warrington and are short journeys away using the M56 rather than the congested road network through the villages.

It will increase air pollution levels in the already highly polluted villages of Stockton Heath, Latchford & Grappenhall the SEUE will only worsen the air quality in those areas.

The plan is not sound in that it will release greenbelt immediately whereas a sound plan would delay any release of greenbelt for at least the first five years of the plan to encourage the town centre regeneration and the use of brownfield sites. The plan could then be reviewed taking into account the significant changes we are going through as result of Covid, Brexit and the Climate emergency. Due to those significant changes we are experiencing significant changes to our lifestyles and work patterns and we would be better placed to make decisions on future planning using the most up to date ONS data which may confirm that no greenbelt release is necessary. If the plan was sound it would preserve the greenbelt while there is so much uncertainty regarding the true future demand for housing in towns & cities in England.

It is also not sound in that the SEUE proposes a minimum of 4200 homes however there are no guarantees regarding infrastructure to support the homes and they are developer dependant, there is no confidence that the infrastructure will be built before the houses which is all to frequent a reality for new communities and there are insufficient safeguards within the plan that is credible and will actually deliver the infrastructure required to support the plan.

Warrington requires affordable housing of mixed tenure built in or near the town centre which has the facilities and transport links required to support affordable housing. The type of homes that will be built will be in the main executive housing with a small proportion of so called affordable housing but affordable to who?

The plans is unsound in that in that it will create a continuous suburb linking all the villages of Stockton Heath, Grappenhall, Grappenhall Heyes, Appleton Thorn, Appleton, Wrights Green & Stretton which will stretch from the M56 through to the Bridgewater canal and is contrary to the councils own stated goal of preserving the distinctive villages that surround Warrington, it will in fact destroy those villages and turn them into an urban sprawl

This plan 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.

It sacrifices the open green spaces of South Warrington for no valid reasons, it is damaging to the environment, unjustifiable when you look at it against the 2018 ONS data.

It will work against plans to develop the town centre and remediate brownfield land, It will have inadequate infrastructure to support the development of the green belt and there are no concrete proposals for the funding of that infrastructure.

The plan has one purpose which appears to be the unjustifiable and premature release of the greenbelt which should be protected for future generations of people living in and around Warrington who will be able to enjoy the green spaces and ancient woodlands that they enjoy today

Given the government's latest announcements and Michael Gove's comments regarding the protection of the greenbelt and the ending of housing targets..then now is not the time to go ahead with this plan.

Regards

Bill Kidley

