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From: [redacted]
Sent: 15 November 2021 16:19
To: Local Plan
Subject: Warrington Local Plan 2021-2038 - Representations

These are my reasons for disagreeing with the unnecessary release of greenbelt and the building of a minimum of 4200 homes in the south east urban extension, when 11,800 homes can be built on brownfield sites in Warrington

1) The consultation process itself not sound, the vast majority of the greenbelt release takes place in the South East Urban Extension, all of the council run consultations sessions were held at the Halliwell Jones stadium north of the Bridgewater Canal, the Manchester ship Canal, the Mersey and the town centre whilst the vast majority of the greenbelt development is proposed for south of these water barriers. Consultation events run by the council with council officers present should have taken place in the south of the Borough. The area most directly affected the South East Urban Extension could have had council run consultation events as last time in venues such as the park Royal Hotel. The failure to do this renders the consultation process unsound.

2) The case has not been made for the growth that is driving the increased housing numbers in the The Plan. The 2018 ONS data predicts significantly lower growth for the town, in fact a projected housing requirement of 458 homes per annum verses the plans 816 homes per annum. The Plan has not been adapted to take into account the latest data. Importantly the growth in housing numbers generated by the standard model are “not a target” but a starting point, this starting point should be amended to reflect the 2018 ONS data. Because of this failure to adapt the growth numbers driving the plans are not sound.

3) The case that is made for the green belt release not sound. The The Plan refers to an annual “target”, may I remind you that, Christopher Pincher MP (Housing Minister) in parliament on the 2nd of March 2021 stated that, “the standard method for assessing local housing need is only the starting point in the process of planning for new homes it is not a housing target.” Instead it is a starting point. The Council appear to have used this as a target and then increased the numbers via further uplift of 10% generating a total requirement of 16,157 homes over an 18 year period. See also point (i) above.

The Plan, at point 4.1.10 of the document, Confirms that Warrington has an urban capacity of approximately 11,800 homes that could be built on brownfield sites, the annual “target” pre the 10% uplift of 816 homes (which I considered to be un sound and excessive), Implies that there is sufficient Brownfield land to support a 14 1/2 year building program. On this basis there is no need to release any greenbelt until sometime well beyond the first decade of this plan.

The priority of the Council should be renewal of the town centre and the development of Brownfield sites not release of the greenbelt.

There is no need for greenbelt release for well over 10 years using the councils own numbers if the Brownfield land available is remediated. The council have some £1.7Bn billion of borrowings much of which relates to investments. If some of these investments were realised the capital recovered could be put to local use in remediation of the Brownfield sites. The councils priority should be that of regeneration of the town centre and the Brownfield sites around Warrington.

In the early years of the plan an enhanced stepped approach to the building figures could be taken which would allow for only the available brownfield sites to be developed.

Greenbelt release as an immediate consequence of this plan will have the affect of drawing development and developers to the released greenbelt rather than focusing attention and effort on the town centre and Brownfield developments and Work contrary to plans to regenerate the town centre.

4) The Council 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 Brownfield land is available for use there is no sustainable justification for the release of greenbelt land on the outskirts of the town. The release of greenbelt in the countryside surrounding the town and in particular the South East Urban Extension will create further car dependent suburbs, leading to further congestion, pollution and negatively impacting the climate change agenda of the Town and the Country.

The South East Urban Extension for example, has no provision for any form of mass transport other than the motor-vehicle and vague promises of public transport systems. The topography of the area that is ear marked for the South East Urban Extension makes realistic alternative to the car almost impossible for journeys to and from the town or journeys to work.

The release of greenbelt for the building of the South East Urban extension is not sound and unsustainable given the context of a climate emergency.

5) The plan is not sound in that it fails to address the already chronically overloaded road system in South Warrington. The bottlenecks of Stockton Heath, Latchford, junction 10 of the M56, Junction 20 of the M6, and London Road between Stockton Heath and junction 10 of the M56.

The limited contribution to the road network contained within the plan for the South East Urban Extension is a link road from Grappenhall Hayes to Dipping Brook Avenue with a connection to the existing road net work near Grappenhall Lane and a connection of a link road from Stretton Road to the A49 somewhere opposite the Spire Hospital. These do not address any of the current issues of congestion rather it simply links areas within the already congested hinterland bounded by The Bridgewater Canal, the M6, the M56 and London Road.

Specifically there are no concrete plans to address the junction at Lyons Lane and the A49, or the Owens corner roundabout on to the A49, both of which, if these plans were to go ahead, would see significant additional traffic flows and further congestion.

The proposed new junction opposite the Spire Hospital has enormous potential drawbacks. If this is to be operated by traffic lights it would create a further worsening of the congestion that already sees vehicles backing up to the junction 10 of the M56. The implications of having traffic lights opposite the Spire and at the Cat and Lion will only increase the congestion on the A49 both northbound and southbound.

The proposal that in the short term there is a potential to link the A49 opposite the Spire to Spark Hall close, is practically unworkable and creates significant congestion at the junction of Stretton Road and Spark Hall close opposite Saint Matthews Church and Saint Matthews school.

I can only conclude that those proposing the plan have not understood of the current issues facing the road network around the Cat and Lion junction and junction 10 of the M56.

The separation of the South East Urban Extension from the town of Warrington is exacerbated by the lack of the creation of any new crossings over the Bridgewater Canal, The Manchester ship Canal and the Mersey in this area of Warrington.

The possible addition of the Western Link will do nothing for the congestion in South East Warrington. In any event It is questionable whether the business case for the Western Link is now sound.

6) The plan is not sound in that it fails in particular with the release of greenbelt to support the economy of the town. The residents of the South East Urban Extension because of the three water barriers to the town centre and the heavily congested road network leading to Warrington will be inclined to look for leisure and retail activties in, Manchester, Liverpool, Chester, Northwich and Cheshire Oaks all of which offer much more than the facilities in Warrington Town centre and are only a relatively short journey time away.

7) The plan for the South East Urban Extension is not sound, in that it creates a minimum of 4200 homes of which approximately 850 will be for rent. The lack of facilities and public transport will have the effect of stranding those who are potentially less well off in areas without accessible facilities to support their needs. The plan fails to locate those who need services most in the locations close to the town centre where services are available without the requirement for travel by car.

8) The proposed addition to the road network known as the Western Link is not sound, the economic case for this new road crossing of the Manchester ship Canal and Mersey no longer exists in The Plan. The western link will do nothing for connectivity for those residents living to the east of London Road. The western Link will have the perverse impact of increasing road traffic through Warrington as motorists seek an alternative to the toll bridges over the Mersey towards Widnes.

9) The plan is not sound, in that it will increase air pollution levels in the already highly polluted areas of Stockton Heath, Latchford and London Road. Any plan cannot be sound in that increases the unacceptable levels of air pollution already experienced in South Warrington.

10) The plan is not sound because it releases greenbelt immediately and will divert investment from the regeneration of the town centre and the Brownfield sites around the town. A sound plan would delay any greenbelt release until at least the first five years of the plan were completed at which time when the plan is reviewed The significant changes to lifestyles and work patterns caused by Brexit, Covid, and the climate emergency as well as the most up-to-date ONS data may well confirm that no greenbelt release is required to support the growth of Warrington.

A sound plan would preserve the greenbelt when there is so much uncertainty regarding the real future demand for housing in the towns and cities of England.

11) The plan is not sound because it fails to grasp the opportunities and challenges of the 21st-century. The lack of sustainability of the plan is hi lighted by the development of more warehousing facilities on greenbelt land at the 656 employment area.The plan for 656 fails to understand the potential scale for automation of warehousing facilities, the predicted jobs growth is unlikely to happen as warehouse companies automate their processes. The South East Urban Extension creates a huge suburb with connectivity issues to the town centre. The South East Urban Extension is likley to be of residential interest for to people working in Liverpool, Manchester and Chester, creating commuter dormitory wholly car dependent and disconnected from the Town.

12) The plan is not sound, the Southeast urban extension proposes a minimum of 4200 homes but there are no guarantees regarding the infrastructure to support those homes the provision of which are developer dependent. The Plan provides little

confidence that the infrastructure will be built ahead of the homes, this is the all too frequent reality for new communities and I do not see sufficient safeguards in the document to give any credibility to the delivery of the infrastructure required to support these homes.

13) The Plan is not sound, it's building the wrong homes in the wrong places, Warrington needs affordable housing of mixed tenure but this affordable housing needs to be near to the town centre with the facilities of the town centre accessible to those living in affordable housing. The plan does not deliver this in fact its target for affordable housing is only 20% for inner Warrington developments and 30% elsewhere.

14)The 656 employment development area is not sound, the expectation that people travel to work by walking, cycling and public transport is simply unrealistic. Whatever employment is created at 656 The consequences will be increased motor vehicle traffic movements through the already congested road network of South East Warrington. Employment opportunities need to be created closer to the town centre and sustainable transport links.

15) The plan is not sound, the South East Urban Extension creates a continuous suburb merging Stockton Heath, Grappenhall, Grappenhall Hayes, Appleton, Wrights Green, and Stretton. Appleton Thorn is one field away from becoming part of this huge suburb stretching from the M56 all the way to the Bridgewater Canal. It runs contrary to the councils own stated goal of preserving the distinctive villages that surround Warrington, instead it merges all the distinct areas referred to above into one enormous suburb.

16)The plan is not sound and unsustainable, given that the southern most developments in the South East Urban Extension will be adjacent to the M56 exposing residents of that area to air and noise pollution. It cannot be a sound or a sustainable policy to be locating peoples homes in close proximity to the heavily used M56 at junction 10.

17) The plan is not sound in that it 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.

18) The plan is not sound, the plan comes only seven years after the last local plan which was meant to last and preserve the greenbelt for 20 years. There are no exceptional circumstances presented in the plan that justify the release of greenbelt.

19) The plan is not sound, the opportunity to develop Fiddlers Ferry which has rail transport links to the town centre has been sadly missed, this location should not become an employment location but rather a new village built on Brownfield land with sustainable links to the town centre and beyond. The plan as currently drafted fails to capitalise on the opportunities that present themselves to the council for Brownfield land residential use at Fiddlers Ferry.

20)The plan is not sound its sacrifices the pleasant green spaces of South Warrington for no valid reasons, it is harmful to the environment, unsustainable in the context of the climate emergency, unjustified when looking at the 2018 ONS data, detrimental to the plans of developing the town centre, detrimental to the remediation and improvement of brown field land, contrary to the maintenance of distinctive and separate villages, woefully Inadequate in terms of infrastructure to support in particular the greenbelt development, woefully inadequate in terms of concrete proposals for the funding of infrastructure and services. The plan appears to have one purpose which is the unjustified and premature release of greenbelt. A greenbelt that should be protected for the future generations of people living in Warrington able to enjoy the green spaces the people of Warrington enjoyed today.

21) To progress the plan now is not sound, given the government's latest announcements and Michael Gove's comments regarding the protection of the greenbelt and the ending of housing targets.