Planning Department, Warrington Borough Council, Environment and Regeneration, Development Control, New Town House, Buttermarket Street, WA1 3HN Tel: 01925 442 819

From Michael Keane,

14/11/2021

Re: Plan to build the **"South East Warrington Urban Extension"** over the **"Green Belt"** in South Warrington.

Having reviewed the revised proposed development plans I am writing to **OBJECT** to the "South East Extension" plan as I believe it is not sound.

It will result in the destruction of another 5% of the dwindling Green Belt in order to make way for at least 4,200 houses, 2,400 of which are planned to be built before 2037.

I believe these are the wrong houses in the wrong place at the wrong time. I don't believe it is the right plan for Warrington as a whole and certainly not South Warrington, particularly Appleton, Appleton Thorn, Grappenhall and Stretton. Here's why.

AIR QUALITY

In 2011 the Council's Local Transport Strategy said "Warrington attracts more journeys to work (97,078) each day than it generates (85,813) and is the eighth largest attractor of work trips in Greater Manchester, Merseyside & Cheshire".

It went on "Warrington has a higher percentage of people commuting over 20km to work in (17%) or out (18%) of the borough than the rest of the North West (10% & 14%)".

In May 2016, the World Health Organisation named Warrington the second worst place in the North West for breaching air pollution safety levels.

Professor Paul Cosford the Medical Director for Public Health England, a national organisation that advises the Government and Local Authorities how to improve the nation's health, said in March 2017 "Air pollution can damage lives with harmful effects on human health, the economy and the environment. It is the largest environmental risk to the public's health, contributing to cardiovascular disease, lung cancer and respiratory diseases. It increases the chances of hospital admissions, visits to Emergency Departments and respiratory and cardiovascular symptoms which interfere with everyday life, especially for people who are already vulnerable. Bad air quality affects everyone and it has a disproportionate impact on the young and old, the sick and the poor"

(Information source: WBC Air Quality Annual Status Report 2016. https://www.warrington.gov.uk/info/201090/environmental_issues/2024/air_quality and pollution).

Warrington already has a heavy reliance on motor vehicles. Cars are a significant cause of air pollution and directly contribute to death and ill health in Warrington already, particularly among the poor. This new plan, if implemented, will only add to this problem.

Only a few weeks ago we were listening to this in Boris Johnson's address to World Leaders at the COP26 climate summit "We are pumping carbon into the air faster and faster- record outputs and quilting the earth in an invisible and suffocating blanket of CO2 raising the temperature of the planet with a speed and an abruptness that is entirely manmade and we know what the scientists tell us and we have learned not to ignore them. 2 degrees more and we jeopardise the food supply for hundreds of millions of people".

Nowhere in this speech is there a section that says "I'd like to make an exception for the building of executive homes on the Green Belt in Warrington South".

GREEN BELT

Around 1400 acres of Green Belt will be lost to Warrington, 1000 of those from the Appleton/ Grappenhall area. The justification for this loss of Green Belt is written in the Warrington Borough Council Economic Development Needs Assessment report of August 2021, point 3.42. "Sites with more direct motorway access are preferred with the focus on a strategic scale development in South East Warrington, close to the M6/M56 Interchange".

This continued preference for car transport is misguided and is the opposite of what we are told is recommended by the Government and Warrington council themselves. On the council website is a list of behavioural changes they wish the local population to make to reduce Global Warming. These include "cycling to work instead of driving which will help to make a difference." It goes on "we want walking or cycling to be the first choice for everyday journeys in Warrington" and under a section called "Travel Smarter" we find "Leave the car in the garage more often, car-share, cycle, use public transport or walk".

Why then this huge housing development miles from the centre of Warrington with no additional shopping infrastructure plans attached? This will only increase fuel consumption and carbon emissions as people will have to travel further afield for their shopping or leisure. Probably Manchester or Liverpool as there appear to be no plans afoot to make it any easier to cross the Manchester Ship Canal into Warrington.

It has become an inconvenient truth that the existing Green Belt boundaries were set only 7 years ago and were intended to apply for 20 years. Is it surprising that polls continually show politicians are not trusted by the people they theoretically serve? Once the Greenbelt is gone there are no plans to limit urban expansion from then on.

There has been no attempt to address the environmental and ecological harm which will be caused by building over the Green Belt.

There has been very limited attempt to use Brownbelt land to create "affordable housing", a policy recommended by the government themselves. Potential sites are the Crossfield site and relocation of the hospital as mentioned by the South Warrington Parish Councils' Local Plan Working Group.

Now that Mr Michael Gove has recently been given the role of housing secretary hopefully he has decided to "pause" the plan (his word) and address his fellow MPs concerns about the zoning system in which all Councils in England have to classify all land in their area as "protected", for "renewal", or for "growth".

The reforms to planning policy introduced by the government are being questioned by their own ministers. Sir Roger Gale, said: "The zoning concept (part of the Government's changes) has got to go and I want a clear undertaking that there will be presumption that top quality agricultural land will not be developed on."

It is not just Conservatives who are questioning the ramifications of the reforms. Labour's shadow Communities secretary Steve Reed said the reforms should be "scrapped altogether" adding that they risked "selling out communities and gagging residents from having a say over development in their area".

This "pause" in Government thinking has no doubt been inspired by the loss of the Amersham and Chesham by election to the Liberal Democrats over this issue. It also provides a timely opportunity to stop the destruction of the character of South East Warrington by what the Warrington Council now call the "South East Warrington Urban Extension."

HOUSING

While 2,400 houses are planned to be built up to 2038 in the South East Warrington Urban Extension plan there is the possibility of 1,800 more being built after that date. This is in reality obfuscation as the date of build can be brought forward. So, in effect 3,200 houses can be built in the area in the next few years.

There is no evidence of this level of demand for this type of housing from the people of Warrington themselves. It is not affordable for them or close enough to facilities. The large "Executive" homes in this area will no doubt be aimed squarely at commuters to Manchester and Liverpool which will create more car use.

Workers at the warehouses and distribution areas of the logistics firms proposed will most likely commute from outside the area. More car use, more blocked roads, more pollution.

None of these houses will help the regeneration of Warrington town centre which is sorely needed. They are too far from either railway station to give commuters an opportunity to use those services. The town centre will continue to decline.

Due to the Covid-19 Pandemic, the focus has been on working from home where possible. This trend is likely to continue to some degree moving forward. It makes no sense to destroy Green Belt areas in order for cars to access the motorway network when there may well be a decline in the number of people commuting by car.

FIT FOR PURPOSE

There is no evidence in the history of Warrington's population growth to support building on the Green Belt on this scale.

The plan details are sketchy at best and crucially provide few details of infrastructure improvements to warrant building all these houses.

It does not include plans to improve existing congested car arteries like the A49 which will have to support even more traffic.

There is still no indication of how to improve local roads leading to bridges crossing the ship canal to get to Warrington Town Centre. Or the bridges themselves.

The plan gives no guarantee that infrastructure will be in place before houses are built.

There is no explanation of how the integrity of local villages will be maintained when surrounded by "Executive homes".

It does not clarify how any of this plan is proposed to resuscitate a town centre where quality shops like M&S have already left.

It involves a huge Urban Regeneration proposal and bigger logistics sites linking to the motorway network when all indications are (HS2) that the rail is the direction of travel in transport services of the future.

It does not take into account projections for working from home post Covid-19. The number of commuting journeys to offices have fallen at an astonishing rate. Most offices do not expect staff to be commuting to Manchester and Liverpool every day.

With the so-called "Northern Powerhouse" in full swing plus the improvements to transport promised by the Government, the plan does nothing to capitalise on good existing rail connections to London or Glasgow or Manchester and Liverpool.

PROTECTING THE GREEN BELT

Statistics from the Ministry of Housing, Communities and Local Government show the largest increase in the amount of Green Belt land released for housing to date.

An analysis by the Campaign to Protect Rural England (CPRE) shows that since 2012 almost 10,000 hectares of Green Belt land have been released from 'protected' Green Belt boundaries by local councils. Ten councils have together released more than 5,000 hectares in the past year alone.

CPRE say Green Belt is the most profitable for developers as it is 'shovel ready'. By definition it is the countryside and usually within commuting distance to major cities. In this case Manchester and Liverpool. Local councils are left to foot the bill for the infrastructure requirements that result like schools, shops and roads.

Planning permission was granted for 378,600 homes in England last year. But housebuilders have increased their land banks by 20% over the past 10 years, while the overall rate of actual building of houses has slowed.

Rebecca Pullinger, Planning Campaigner at the Campaign to Protect Rural England, said, "National planning rules require local councils to show exceptional circumstances when they remove land from the Green Belt. These statistics illustrate that since 2012, such changes are no longer exceptional. Building within or on land released from the Green Belt is not the solution: it results in low density, unaffordable homes out of reach of those who desperately need to get a foot on the ladder."

"Under this planning authorities have to demonstrate they have exhausted all other reasonable options to meet development needs before even considering changes to the Green Belt and then evidence exceptional circumstances to justify development."

TOWN CENTRE

The Prime Minister used his recent major Conservative Party Conference speech to signal a commitment to protecting our green spaces from unscrupulous development.

In this speech, where leaders typically lay out their priorities, Boris Johnson asserted there was no reason that the countryside should be lost to new unaffordable homes, saying 'you can... see how much room there is to build the homes that young families need... beautiful homes, on brownfield sites in places where homes make sense.'

The "Urban Extension" plan is diametrically opposed to this clear statement. The many Brownfield sites of the Town Centre will not be revived under these proposals. In fact the proposed plan is almost certainly going to draw money away from the Town Centre to Manchester and Liverpool. The Six56 employment area next to Lymm Motorway junction will also result in drawing resources away from the Town Centre at the cost of another 137 hectares of Green Belt.

IN SUMMARY

THE PLAN IS NOT SOUND BECAUSE

There is NO justification for predicted growth.

There are NO exceptional circumstances to validate building on this scale on the Green Belt.

There is NO need to destroy the character of the villages in South Warrington.

There is NO clarity in the plan to deliver an infrastructure to support 4,200 houses.

There is NO benefit for increased car use in a pollution hot spot.

There is NO preference given to Brownfield sites near the Town Centre.