



7th November 2021

Director of Planning
Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA4 2NH

Dear Sir

Warrington Borough Council Local Plan Consultation

I have reviewed the above plan and would like to submit a number of comments.

1.Forecast Demand for Housing and employment Space.

The Local Housing Needs Assessment and Employment Land Forecasts do not seem to take into account the effect of the successful regeneration of Manchester and Liverpool will have on the future demand for residential and employment land in Warrington. Historically Warrington has benefited from the industrial decline of Manchester and Liverpool as people and jobs moved out of the conurbations. This resurgence of the economies of the main cities in the North West is likely to limit or reduce this flow and this important structural change needs to be reflected in the future demand assessments.

The densities proposed in the plan do not seem very ambitious. The National Planning Policy Framework suggests that significantly increased minimum densities should be established in town centres and in other locations well served by public transport.

Reflecting the structural change taking place in the North West's economy and increasing densities will reduce the area of housing and employment land required during the period of the plan.

2. Release of Green Belt Land.

The 2012 Local Plan Core Strategy, prepared by Warrington Borough Council, sets out the aims of protecting the green belt, developing sites and services in locations accessible by public transport, accommodating 80% of development on brownfield land and reducing the impact of traffic on air quality. The proposed South East Warrington Urban Extension, proposed Thelwall Heys residential development and Six 56 is largely located on green belt land. These allocations are not in accordance with the 2012 core strategy as they are not brownfield, not accessible by public transport and will contribute to deterioration in air quality. They do not therefore meet any of the 2012 criteria.

The National Planning Policy Framework provides that, once established, green belt boundaries should only be altered in exceptional circumstances and it is not clear from the current plan why such a major departure from these policies is justified. In particular there is no evidence of discussions with neighbouring authorities (other than in respect of the proposed Omega expansion) on accommodating the identified need for development land.

The 2012 plan envisages maintaining the green belt until at least 2032 with a view to preventing urban sprawl, focusing investment in the urban area, to facilitate regeneration and prevent adjoining towns coalescing. These objectives remain of critical importance and the preferred development option does not provide sufficient justification to make the major changes envisaged to the green belt.

3. Protection against air pollution provided by the Green Belt.

Maintaining the green belt is perhaps more important than it was in 2012 in the light of the recognition of the effect that poor air quality has on public health. The green belt provides an important protection against the pollution coming from the motorways surrounding Warrington. The preferred development option would effectively remove this "green lung" protecting the town from the M56 and M6 pollution.

4. Thelwall Heys Allocation

The proposals to remove this site from the Green Belt seems particularly perverse. The Council's Green Belt Assessment undertaken by Arup in 2016 identified this as a site which made an important contribution to the Green Belt objective with a medium classification. If the release of Green Belt land can be justified it would seem sensible to focus on those sites which made a low contribution to these objectives.

The site is separated from the existing urban area and has only very limited access to public transport and local services. It is hard to see that how this allocation matches the Council's objective of achieving a sustainable development. The principle justification for the allocation seems to be that it is greenfield and can be developed quickly. Developers will always prefer the easy option and allocations of this nature will only undermine the important objective of redeveloping more difficult brownfield sites.

5. Provision of New transport infrastructure and Public Services.

Having examined the criteria for Urban Expansions it would appear that the initiative is based on the concept of sustainable development. It is hard to see how the proposed development of a huge residential and industrial estates, which are separated from the town centre by the major barrier provided by the ship canal and provides no access to public transport infrastructure can meet these sustainability criteria. Development of this scale should at the very least provide a viable alternative to the use of the car such as access to the rail network and a new crossing of the ship canal.

The plan recognises that strategic road infrastructure may be required but is vague on the any details. I am skeptical that these proposals will survive contact with market reality. The new strategic road infrastructure and public services will be a cost to the public sector in a time of austerity whereas there will be a huge financial incentive for owners whose land has been removed from the green belt to assiduously work the planning system to ensure the early release of their land for development. There is a real risk therefore that the new green belt allocation will place intolerable pressure on roads and public services which are already operating at capacity. Before significant development is permitted South of the Ship Canal therefore confirmed funding and legally binding

delivery mechanisms must be in place for a new road crossing, community facilities and public transport improvements.

6. Cycle Infrastructure

Warrington is in principle ideally suited to travelling by bike as it is a compact urban area which is relatively flat. Whilst the former New Town areas are well serviced by cycle paths this is not the case in South Warrington where the cycling infrastructure is, poor fragmented and in most cases none existent. Making travelling by bike safe and attractive would reduce congestion and pollution and improve the health of the local community. In my view the draft plan does not place sufficient emphasis on encouraging cycling in Warrington. At the very least the plan needs to provide for a strategic cycling infrastructure with dedicated cycle lanes, within the 30 mph limit, along the A49 and A50 together with segregated crossings of the ship canal to link South Warrington to the Town Centre. Safe cycle-friendly routes are also required to cross Bridgefoot

7. The Effect of the Preferred Development Option on Local Communities

The plan would fundamentally alter the nature of Thellwall, Grappenhall, Appleton and Appleton Thorne. There would be a real risk that they would lose their local character and be subsumed in a gigantic area of urban sprawl.

8. Employment land Allocation on the M6/56 Junction.

The recently schemes promoted by Langtree and Stobarts suggest that the entire allocation will be taken up by large scale warehouses. Warrington already has a major logistics development at Omega on the M62. The plan does not provide any evidence from the Omega scheme on whether this type of development provides well paid employment for local residents. The loss of important green belt land to provide minimum wage jobs for people not resident in Warrington is hard to justify. Targeting new employment development on higher skilled less land hungry uses would seem to be more in keeping with the plan's stated objectives.

In the light of the real problems with the preferred development option I would urge you to reconsider your proposals. My own view is that if the release of green belt land can ultimately be justified it would be more

sensible to allocate development on the town centre side of the ship canal and where ready access can be gained to the rail network. The land between Birchwood station and the ship canal presents one such opportunity.

9. Self Build Plots

The plan recognises the importance of providing plots for individuals or groups who wish to build their own home. Historically self build was the mechanism by which working people were able to own their home facilitated by the building society movement. Housing developers have little incentive to sell plots for self build and each plot sold represents a loss of potential profit. It would be helpful therefore if the plan included a firm commitment to provide such self build plots on any Council owned land released for development and to establish binding delivery mechanisms when granting planning consents.

10. Traffic Speed

The plan is completely silent on the importance of controlling excess speeding in Warrington. Speeding is not only a road safety issue but creates a threatening environment which discourages walking/cycling and generates noise and increased pollution which impacts on local residents. Speeding is a particular issue on Grappenhall and Thelwall. Our local Speed Watch surveys have logged an average of over 4000 vehicles a day travelling toward Warrington at excessive speed.

The increase in walking and cycling during the first lock down provided an insight into what our town could be like if excessive speed was addressed effectively. The plan should therefore include proposals for designing new roads in a way to discourage speeding and the provision of traffic calming measures for existing speeding hot spots.

I would be grateful if you would kindly keep me informed of the Council's response to the consultations.

Yours Faithfully



David Shelton