

From: [REDACTED]
To: [Local Plan](#)
Subject: Local Plan Consultation Feedback
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WARRINGTON UPDATED PROPOSED SUBMISSION VERSION LOCAL PLAN (SEPT 2021)

Sent by Andy Openshaw, [REDACTED]

I believe the plan has a sound basis, and is an improvement over the initial draft for consultation, but needs considerable improvement.

Timings

- The consultation period is not long enough. Expecting residents to be able to make sense of >45 documents, some of which need to be read alongside the original documentation to identify differences in ~6 weeks, is not long enough. There have been extremely limited options to attend WBC run presentations (particularly due to any periods of isolation needed with the ongoing pandemic).
- The consultation period appears to be at odds with the (as at 15/11/2021 still to be announced Northern Powerhouse Rail / HS2) - likely to be published very shortly after the closure of the Warrington Local Plan consultation period. The limited information available (NPR linking with HS2 south of Lymm / at High Legh, but transiting 'Warrington Town Centre') suggests that the proposed rail routes will have a major impact on parts of the local plan, and may impact (positively) on transport links.
- The UK government has stated there will be changes to the Local Plan process, but the current Warrington Local Plan does not appear to have flexibility built in (no prioritisation, or indication of what parts of the plan would be reduced or removed if requirements reduce, which seems highly likely)

Release of Greenbelt.

- Whilst it may be necessary to release Greenbelt to achieve targets for new homes, the overall numbers of homes stated in this version of the plan can at this present time be considered to be excessive & could be reduced. The plan should allow for this, and be clear that the larger areas planned for release (South East Urban Extension, Thelwall Heys) should only be released if absolutely necessary - if the need reduces these areas should remain as Greenbelt.
- The justification for release of Greenbelt includes the argument that 'new Greenbelt boundaries would be strengthened' - the process / mechanism by which this would be achieved is not explained, and the notion is counter intuitive - in most cases the release of Greenbelt is significantly reducing the boundary, such that the boundary

will be weakened by the proposed Greenbelt release.

- There do not appear to be exceptional circumstances provided as justification for release of Greenbelt land; furthermore it would seem that release of larger areas of Greenbelt (South East Urban Extension would require stronger 'exceptional' circumstances than smaller areas - this is not provided.
- The plan does not appear to consider redevelopment on the Lever Brothers site behind Bank Quay station - at the very least release of this site should negate the need for some of the release of Greenbelt, and the Plan MUST demonstrate that it can be flexible enough to accommodate such opportunities to reduce the loss of Greenbelt.
- Greenbelt must only be released if / when it is developed - there must not be a blanket redrawing of Greenbelt boundaries e.g. as / when the Plan is approved.

Lymm & area specific:

- Lymm has seen significant development over the last 40 years, with next to no investment in infrastructure. The current draft Local Plan does not commit to correcting this.
- Whilst Lymm has a good pre-existing footpath and bridleway network, the state of some of the key active travel routes to main areas (housing areas and village centre to schools) is such that they are not usable by able bodied people for large parts of the year.
- There have been no new sports fields in 40 years of extensive development. The existing sports fields are of such poor quality with severe drainage issues that they are not usable for large parts of the sports seasons (Sow Brook playing fields are estimated to be usable for only about three months of the year. Parking availability at existing sports fields is poor (Ridgeway Grundy, Sow Brook) to non-existent. The proposals for investment & improved drainage are welcome, but should be given a schedule e.g. within a five year window; or could be made dependent on progress of the local plan (sports facilities to be upgraded on a percentage basis against percentage completion of the plan)
- Lack of changing facilities for girls / ladies sports in Lymm in particular is non-existent.
- Lymm playing field provision (and parking, possibly facilities) could be and should be improved substantially with no loss of greenbelt by improving drainage on existing playing fields at the four Lymm Primary schools.

- The plan MUST deliver a strategy for dealing with the disruption to key travel routes in this area by Rain. The proposed development in Statham would have been impacted by the closure of the village centre aqueduct for over a week in September 2021 due to flooding (September rainfall was below average in 2021); and Burford Lane Aqueduct is flooding every two months on average since July 2019, with traffic having to divert onto bridges and roads that themselves are simply not suitable.
- The release of Greenbelt next to Statham School appears to include release of the allotment gardens, with no explanation / alternative provision. This must be clarified (either it is a mistake, or presumably suitable alternative provision needs to be allocated nearby)
- The plan must consider active travel routes from new developments to main areas - shopping / health facilities and both primary and secondary schools. A suitable benchmark would be VERY senior council staff walking the full route in December in suit trousers and office shoes (currently impossible in Lymm due to the mud, despite below average rainfall for the last found months to mid November 2021. The Lymm accident in March 2021 ([Warrington Guardian link](#)) highlights the complete lack of regard for schoolchildren - several large estate's have been built without regard to improving existing public footpath to make them suitable as active travel routes to the High School (and local primary school all year round, in all weather.
- The Lymm Tanyard Farm / Land off Thirlmere Drive sites must be provided with all weather active travel routes to both Lymm Village Centre, the closest primary school(s) and Lymm High School. This could be via a pedestrian and cycle bridge over the Bridgewater canal, and / or upgrading of the canal towpath to an all weather cycle route.
- It is not clear how Lymm Schools are expected to cope with the extra students that will be applying for places over the life of the plan, given all schools are typically fully allocated (with the 2021 intake an exception, given the latest / mid 2020 MSOA estimates). The proposed developments in Statham appear to prevent the expansion of Statham Primary School into a double year intake, which may turn out to be short sighted.
- South Warrington has a complete lack of leisure facilities, with the issues at Broomfield compounding this.
- South Warrington have to put up with extremely poor transport links to Warrington Town centre, relying on three or four bridges that were built for traffic in the 18th

century and are in a considerable state of repair. The most significant improvement in the last 40 years to travel from South East Warrington to the town centre is.... Some railings on the footpath in Latchford (unless you use the motorway).

- The overall funding gap on the Infrastructure Delivery Plan suggest that a significant proportion of this may not get delivered, the plan shows no measurable commitments for the vast majority of projects. The level of detail provided is insufficient for the audience to determine whether good value is being delivered, or even if what may be delivered may be fit for purpose. e.g. playing field improvements would need to include facilities for girls / ladies changing & toilet facilities, but such a basic provision is not covered.

Transport

- The proposed Western Link will provide limited / dubious benefit to the majority of South Warrington. It does not appear to be suitable for active travel, and even if it did, it appears the route would be of little benefit to the majority of South Warrington due to placement & egress from the new route.
- The active travel routes options across the Ship Canal are extremely poor, and not suitable unaccompanied children (Latchford locks have been improved, but are still a massive compromise for even the 20th Century.) It appears that the proposed Western link will not be an active travel route.
- The Plan must include provision (it's a plan - this could be shown as an external dependency) for replacement / serious overhaul of all the Ship Canal crossings - whilst these are the responsibility of a private company, they have a major impact on traffic. There are mechanisms that Warrington Borough Council could and should use to force long overdue maintenance of all crossings (including the Rixton / Warburton Cantilever crossing, which for the avoidance of doubt, is on a toll road but is not a 'toll bridge' - it is subject to the same maintenance provisions as all other original MSC crossings). Extended closure of any one crossing (a foreseeable and likely risk) would at current traffic levels be barely tolerable (e.g. traffic would flow without delays of e.g. more than an hour at peak times); but additional issues (on any of the surrounding motorway network - again, a likely & foreseeable risk) could gridlock the entire borough for hours or more.

SE Warrington Employment Area

- The proposed South East Warrington Employment area offers poor 'value' in terms of employment return against Greenbelt land released. The description provided appears to offer fairly low value distribution / warehouse jobs, with no justification provided for the numbers of jobs. The area would need to be accessed by car due to the complete lack of any public transport, and no suitable active travel routes. The area would add traffic to an already extremely busy motorway junction, putting further load onto already congested roads and complex motorway junctions. The Infrastructure Delivery Plan has insufficient detail / commitment to address the scale

of change that would be required to improve this area - there appears to be no strategy to deal with the challenges that this employment area would create. Further development in this area will increase the already significant risk of issues with the M6 Thelwall Viaducts - closures above ~2 hours could gridlock all areas around Ship Canal road crossings, with possible other consequences should heavy freight vehicles attempt to use the ageing bridges across the Ship Canal.

- Less land could be used to create more, higher value jobs via e.g. a science park or other high-value employment area (complementing Daresbury Science Park). The plan at present does not justify exceptional circumstances for the release of Greenbelt for this employment area.