

From: [REDACTED]
To: [Local Plan](#)
Subject: Local Plan Consultation Response -14 Novemeber 2021
Date: 14 November 2021 13:40:59

Dear Sir/Madam

I write in relation to the Council's ongoing consultation on the 2021 draft Proposed Submission Version of the Local Plan (hereinafter referred to as the Plan).

In so doing I have 3 hats:

1. Appleton Ward Councillor since May 2021

<!--[endif]-->Appleton Parish Councillor since May 2021

Resident of Appleton for the last 35 years.

Firstly, I have to state that the Council's public consultation process has been woeful and has failed to meet its statutory obligations. At Full Council on 1 November, a Portfolio Report referred to over 250 attendees at 5 six hour long display events attended by officers at the HJ Stadium in the centre of Warrington. An exercise which attracts only just over 0.1% of the population represents a substantial failure in public engagement and suggests that WBC were trying to slip the Plan through the consultation period unnoticed. For instance, the event was held behind an anonymous door at the back of the stadium with no external signage when I attended and for some of the time that I was there, I was the only attendee. WBC's failure to engage within the communities of Warrington, particularly those most affected by the proposals is unacceptable and unjustified. It contrasts with the consultation policy in previous years when WBC events were held in the Parishes of south Warrington. With less than 300 attendees at the HJ stadium, the Council should have immediately recognised the need to engage more with those communities most affected. It is also noticeable that the Political Leadership of the Council have failed to engage directly with those communities most affected. In summary, the WBC public consultation was flawed and inadequate. The public engagement has failed. This was further demonstrated in a Parish Council arranged street stall in Stockton Heath for over 3 hours on Saturday 13 November 2021. It was shocking that so many residents had not been made aware of the ongoing consultation by the Borough Council just 48 hours before the end of the six week long consultation period.

The Plan is not sound and should be substantially modified in order to address its many shortcomings which are addressed below in no particular order.

The plan has failed to meet many requirements/expectations of the NPPF. Paragraph 16 is one such example. It fails to demonstrate achievement of

sustainable development in that there are shortcomings in the economic, social and environmental justifications.

The levels of economic growth and housing demand in south Warrington are predicated on a need created by wholly unjustified destruction of vast swathes of distinctive Green Belt highly valued by the Communities of south Warrington. This was evidenced by the May 2021 local election results in the south of Warrington where the victors and the vast majority of votes were given to candidates with explicit and high profile policies to protect our Green Belt. The contents of the Plan are a clear demonstration that the Council has failed completely with regard to “*early and effective engagement between plan makers and communities*” as specified in Paragraph 16 of the NPPF.

The need to destroy vast swathes of Green Belt for industrial/logistics development close to Junction 20 M6 is not soundly justified. Self-evidently, logistics providers are attracted to any location at the junction of two major motorways (M6 and M56 in this case) and close to a third major motorway (M62). The need is therefore easy to make but importantly, the Plan is not sound because it fails to address whether other locations in and outside the Borough are available and more suitable thereby avoiding unnecessary and unjustified irrevocable destruction of a vast area of Green Belt for all generations to come.

The building of further logistics capacity in this location is totally counter to the Council’s climate change objectives. It would be wholly reliant on diesel powered HGVs and there is no multi-modal option which could be more environmentally friendly as there is no rail link in this location. The noise and air quality issues arising from this proposal are also detrimental to the residents of the Borough and particularly those in the southern Parishes.

Junction 20 is already over-loaded and this industrial/logistics development will exacerbate this issue.

Finally, the employment generated by this development will further exacerbate traffic problems (noise, air quality and congestion) in the Borough in that many of the workforce are likely to come from outside the immediate area as is demonstrably the case with logistics related employment in the south east of Warrington at present.

The flawed south east employment area development proposal ironically leads to the Council justifying yet more Green Belt destruction in the Plan in the south of Warrington. The increased employment on a Green Belt area of existing low unemployment is used to help justify many of the 2400 plus 1800 homes on Green Belt which the Plan now says will be needed. The south of Warrington does not want the Junction 20 logistics/industrial development and therefore that aspect of housing need should be reviewed. The ability to deliver the associated truly affordable housing provision is not evidenced in the Plan and the sustainability of such housing is also not demonstrated.

A major flaw in the Plan is the lack of understanding of the area of south Warrington. Employment of residents is spread across the north-west with a consequential heavy reliance on cars. The laudable aspirations of LTP4 are not going to deliver the change of transport behaviour hoped for largely because LTP4 is focussed too much on travel to and from the Town Centre whereas this is not the reality of life for many residents.

The Plan is woefully unsound in its infrastructure proposals and associated findings. The Plan would result in release and development of Green Belt without first addressing the extant and woeful transport shortcomings. The funding assumptions are likely to be unachievable from S106 monies and they are all far too late.

The proposals appear to be prepared by consultants who do not understand the current infrastructure situation and the constraints of 3 water crossings between the south of Warrington and the Town Centre (River Mersey, the Ship Canal and Bridgewater Canal). The Plan seeks to repeat past errors. The current ongoing developments of nearly 800 new homes at Grappenhall Heys and Appleton Cross were approved in 2017 despite planners admitting that the A49/A56 junction in Stockton Heath was at capacity. No transport improvements or mitigation were offered. The nearest village centre and shops in Stockton Heath are only accessible by crossing the Bridgewater at one of three points. Two of these are single lane of which one is also a wholly unsuitable ancient hump back bridge which essentially is for cars and light vans only. The third route is the A49 which is already overloaded and unable to be widened.

The Plan proposes up to 4200 new homes without addressing this issue **first**. It is therefore unsound.

The effect of the new Centre Park bridge has been to create a rat run via the Red Lane hump back bridge crossing. This was foreseeable but not addressed by the planners in advance. The crossing point routes over the two canals are already at saturation point and could not cope with new demand from up to 4200 homes even if there is some very limited move away from car usage. The Plan is flawed in this area.

The Plan show Lyons Lane being used as a main arterial route from the A49 into and around the new developments. This road is wholly unsuited for this purpose and is already at peak load at key times of the day not least because of its proximity to both sites of Bridgewater

High School and to Broomfields and St Monica's Junior Schools. The A49 is also already at capacity as planners admitted in 2017. This is a further unsound element to the Plan.

The A556 in Lower Stretton is already unsuitable for the level of traffic it handles and despite the chicane system that has been put in place. The Plan and the 4200 new homes will create extra traffic on this route in the Borough. Lower

Stretton cannot handle any such increase and the environmental and social impact for existing residents in Lower Stretton is unacceptable. The Plan is unsound for this reason.

The plan to modify the Cat and Lion junction just moves some of the problem slightly further down the road and creates two junctions on the A49 on the short stretch between the M56 and the Owens Corner roundabout. The road is already overloaded at peak times and the new houses will exacerbate the problem. Again, the transport infrastructure cannot handle the new traffic from 4200 homes. The new junction close to Spire Hospital on the A49 will also cause traffic to back up to and onto the M56 in both directions.

Junction 10 M56 and Junction 20 M6 will be unable to deal with the extra traffic created from 4200 homes at peak times. The noise and air pollution from extra traffic in the area and on the motorways bounding two sides of the Urban extension is also unacceptable.

Overall, the poor current infrastructure and the lack of timely new infrastructure make the plan unsound as the Urban Extension would not be a sustainable development. The Plan makes clear that some key infrastructure is only deliverable with development taking place beyond the Plan period.

The use of 2014 ONS data as the basis for determining population growth is clearly inappropriate and the Council should make the case that 2018 ONS population data is a more reasonable starting point notwithstanding the NPPF guidance.

In 2019, James Brokenshire, the then Communities Secretary of State confirmed in a letter to Andy Carter, subsequently published, that 2014 was a starting point not a target. The Council are unsound in seeking to base the Plan on 2014 ONS data when all parties acknowledge that this is no longer a sensible starting point and 2018 should have been used instead.

The global issues of climate change and the obvious environmental impact of loss of a large area of Green Belt for the Urban Extension impact are not reflected in the Plan. The environmental impact makes the Urban extension plans non sustainable development and therefore unsound.

The Urban Extension totally destroys the rural distinctiveness of the south Warrington parishes and therefore changes the character of the existing established settlements. The proposals are not sustainable.

The delivery of infrastructure is unclear and uncertain because the funding is based on unreliable growth assumptions and a lot of the funding would be too late.

The economic growth aspirations of the Local Enterprise Panel are not substantiated and are more optimistic than other providers. Green Belt land is

too valuable to the residents of Warrington and to the environment overall and its destruction should not be justified on unrealistic and potentially unachievable economic growth forecasts. The Plan is unsound for this reason.

The Council appears to have a Plan which is focussed on protecting its industrial property investments rather than creating a Plan for sustainable development which largely protects existing Green Belt. This is an unsound approach to developing the Plan.

Employment needs for the unrealistic levels of growth forecast will have to be largely met outside the Borough as employment rates in Warrington are currently high. The housing in the south of Warrington is unlikely to be of the mix which results in logistics employees re-locating to the south of Warrington.

Housing need in the Plan would be significantly reduced if the Plan did not propose widespread use of the Green Belt in south east Warrington for employment use which will almost certainly be non-sustainable logistics development. The housing needs set out in the Plan are therefore not sound.

In the last 10 years, annual new housing build rates achieved in Warrington have been well below the delivery assumptions for the Plan period. Given this track record, the Plan is using unrealistic and unachievable growth assumptions for housing delivery and is therefore unsound.

The plan fails to justify very special circumstances for release of Green Belt for industrial/logistics purposes and for housing development. The requirements of Paragraph 140 of the NPPF are not met.

The Plan has not properly considered all aspect of Town Centre regeneration given changing shopping and leisure habits. The Pandemic accelerated this change. Whilst the regeneration of Times Square and the Cultural Quarter have been very successful and welcome, much of the Town Centre including Bridge Street, Sankey Street and the Golden Square Shopping Centre should have been the subject of a much more radical review. We have seen major stores like Mand S and Debenhams leave for good and a more radical approach is needed to create a fully regenerated Centre area with more residential and leisure activity close to major transport interchanges for younger town dwellers who are less likely to have cars. This mirrors the type of development going on in neighbouring cities like Manchester and Liverpool. The Plan has missed this opportunity and is not sound for this reason.

The Plan fails to prioritise brownfield development to meet urgent housing need. As written the consequence of the Plan is that developers will focus on developing the more lucrative Green Belt land with less affordable housing in the south-east of the Borough. This will be unattractive for many younger buyers who want to be near transport links and night-time leisure facilities. The Plan is therefore supporting non sustainable development on green Belt ahead of brownfield development and more affordable housing in locations where the

demand will be higher.

Fiddlers Ferry would be a good location for housing development rather than the element of industrial development proposed in the Plan because it has a rail link which could be used for a tram or light railway connection to the town centre.

In summary, I totally oppose the wanton destruction of the Green Belt in south-east Warrington to accommodate more logistics hubs and 4200 new homes. This changes the distinctive character of this part of Warrington once and for all. The development is not sustainable from an economic, social and environmental viewpoint. Future generations will never forgive the 2021 political leadership Warrington Borough Council if this Plan is pushed through at enormous cost to Warrington's environment and character with all of the consequential climate change implications.

The Prime Minister and Michael Gove as Secretary of State have stated that they want to protect Green Belt wherever possible and the Plan process should be put on hold until the UK Government clarifies its policy in this area in the next year or so.

Regards

Mark Jervis

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]