

# Proposed Submission Version Local Plan

## PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

**Name of person completing the form:** James Cubbin

**Email address:** [REDACTED]

2. What type of respondent are you? Please select one option only.  
If you are an agent please select the type of client you are representing.

A local resident who lives in Warrington

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	-
<b>Agent name (if applicable)</b>	-
<b>Address 1</b>	[REDACTED]
<b>Address 2</b>	-
<b>Postal Town</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone number</b>	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

MD2 South East Warrington Urban Extension

2. What does your comment relate to? Please select one option.

None of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>		X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Please see the attached PDF which summarises the key points as to precisely why we feel the plan is unsound in its current form.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Believe that other areas of warrington (like that of fiddlers Ferry which has latterly been included) namely brownfield and delapidated areas that are in need of regeneration should be the focus of housing plans as a primary. The erosion of greenbelt in the current plan for the reasons given in the attached PDF is comprehensively the wrong direction of travel when these other areas in our locality are in such dire need of investment first. This has large economic, social and crime benefits over and above creating in effect a commuter town at the back of warrington effectively serving other cities not ours.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: pdo\_531\_redacted.pdf - [REDACTED]

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**Comments/file description**

I wholeheartedly concur with all. Of the points raised in the attached letter. The sheer scale of the proposals in an area of natural beauty and in the middle of greenbelt just don't make sense when compared to the scale of land available in other areas of Warrington that are in dire need of regeneration and investment. In this regard I am pleased to see the fiddlers ferry site included although the vision for this area and quantities of housing seem very vague. There are many other brownfield and delapidated land spaces that should surely be the prime focus.

Irrespective of the scale and location of the development versus other options, surely the permanent deletion of the greenbelt and associated benefits of open spaces is hugely counter to the global agenda of carbon reduction, wellbeing and health. If the plans go ahead we will be seriously looking at leaving the area and bringing our children up in more rural settings.

The village feel of our area and the very purpose of greenbelt to ensure that conurbations don't merge into one large rolling suburb will be lost forever if these plans are approved.

The plans make us very sad in current form. It is such a shame what is happening and the way that it is seemingly being brought to us. I hope that the critical points in my note here and the attachment provided will play a part in a more practical and sustainable plan being formed. Many thanks

You have just completed a Representation Form for MD2 South East Warrington Urban Extension.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**

## **Objections to the Local Plan Preferred Development Option**

First of all, I want to say that I am not against some expansion of house building. The Government's National Planning policy allows for "LIMITED (my capitalisation) infilling in villages" which I would not oppose. However, I am strongly opposed to the SCALE of the proposed development.

However, before I raise important objections to this vast house building programme I want to point out the serious flaws in the method of consultation.

### **METHOD OF CONSULTATION**

I attended Grappenhall and Thelwall Council Meeting on the evening of 21st September and learned from a member of the public that there had been an earlier "consultation" which must have taken place sometime before November last year and to which 78 people had responded. Many respondents were developers who naturally have a vested interest in this project. Members of the public were totally unaware of this and, indeed, so were my local councillors. This was a consultation of which the people of South Warrington were totally ignorant. Residents only found out about the proposed housing development in July when they were able to attend consultation meetings. The response was so great that an extra meeting was held at the Park Royal when over 800 residents formed long queues to get in. The date for responses was extended by a fortnight as a result of our MP's intervention. I attended 3 of these consultations at which there was a glossy presentation but trying to elicit concrete figures was almost impossible.

The consultation took place from July to September. This was too short a period for members of the public to take in the details and form a response. It was a period of time when many people take holidays thus shortening the time yet again to establish the facts and make a response. I went on two holidays amounting to four weeks during that time and have not had sufficient time to digest all the facts and figures and therefore this is only a partial response. There are thousands of people who are in the same position as me.

I now want to put my objections forward and demonstrate that the PDO works on an **idealistic view** and demonstrates **no resemblance to reality**.

## SCALE OF POPULATION INCREASE

The preferred proposal suggests that Warrington needs 24,774 houses in the next 20 years. At an average of 2.3 people to each house this implies a population increase of almost 57,000. Warrington's current population is approximately 208,000 up from approximately 130,000 in the early 1970s.

A further projected population increase of approximately 57,000 means Warrington's population will increase again by more than 25% over 20 years. This is an unacceptable level as Warrington has already absorbed a huge population increase in recent decades. The projected population increase in the whole country is approximately 13% (from 65.6 million to 74.5 million) over the next 20 years. Many of these will want to reside in the South East. Warrington, therefore, does not need twice as many houses as the average for the whole UK.

Even if there were to be a growth of jobs, which is pure speculation in the current climate, Warrington still does not need this enormous development. This is **an ideal** set by the planners in the drive to be seen as forward-thinking and it is **not realistic**.

I attended three consultations, (Village Hotel, Park Royal Hotel, Pyramid Centre), and each time asked about the figures relating to how many houses the planners had chosen to build each year. Each time I was told that of the various figures one of the higher figures had been chosen, namely 1,113 houses in order that WBC could control the development and the plan would be accepted by Government. On your FAQ document you state that:

*"With an up-to-date Local Plan Warrington could be subject to speculative development proposals that may not help deliver THE AIMS OF THE COUNCIL." (My capitalisation)*

In addition [REDACTED] the Executive Director for environment and regeneration is reported to have said,

*"If we don't have a local plan then decisions in the town revert to national planning policy guidelines so you have no control over development"*

The implication is that WBC knows best but I suggest it does not and that is what residents are objecting to.

The lower figure of 995 OAN (Objectively Assessed Need and Housing Targets) could have been chosen. On top of this, the figure has just been revised under the Government's new methodology to 914 homes. If Warrington used the Government's figure of 914 there would be no need to build on our Green Belt. There would be virtually 200 fewer homes needed per year. This is what residents want as opposed to what the Council wants.

However, I have no doubt that developers are queuing up to build in South Warrington where they can expect large profits and I hope that the council will resist the temptation of the prospect of monetary gain from the high rateable values which can be expected from development in this area.

### **THE MERGING OF INDIVIDUAL VILLAGES INTO AN AMORPHOUS GARDEN CITY SUBURB**

There are many villages in South Warrington - Grappenhall, Stockton Heath, Appleton, Appleton Thorn, Stretton, Walton each of which has its own community and identity.

I have lived in South Warrington for approximately [REDACTED] years and strongly identify with Grappenhall. I support many village activities. I am a Friend of Grappenhall Heys Walled, a Patron of Live at St Wilfrid's and a volunteer at Grappenhall Community Library amongst other things. The library is a hub for the community offering many activities for children, the elderly and anyone visiting would see the strong sense of community in this village.

This is the community I identify with but I know that people who live in the other villages have the same sense of loyalty to their own village and community.

The Preferred Development Option merges these individual villages into an Amorphous Garden City which will destroy any feeling of belonging to a community.

Again I see "Garden City" as some **ideal solution** which planners have latched on to and which is **not realistic**. The name alone suggests this.

### **THE SIGNIFICANT LOSS OF GREEN BELT**

I am aware of the 5 criteria for green belt and have looked at the assessment of the performance of our green belt. The phrases "performing poorly" or "weak" are meaningless in the context of open countryside or farming land. Nobody wants a manicured country park as proposed in the plan. Instead they would prefer to see natural countryside - fields, farmland and woodland - which supports agriculture, wildlife and good quality of life.

There are a number of sites in South Warrington which have been blighted by HCO signs for many years. It seems a coincidence that the "weaker" Green Belt covers these areas.

Paragraph 83 of The National Planning Policy indicates that established Green Belt boundaries should only be altered in "exceptional circumstances". Nowhere in the PDO can I see a substantial argument to demonstrate that these are "exceptional circumstances." Exceptional is a very strong word and it is impossible to imagine such extreme conditions that any Green Belt needs to be released. I have already shown that the housing figures chosen by the planners are far above what is needed and if the Government figures are used no Green Belt needs to be released.

One criteria for protecting Green Belt land is "to assist in safeguarding the countryside from encroachment." The preferred development plan does the opposite of this. It states that 10% of our vital Green Belt is to be sacrificed to unnecessary expansion.

However these statistics need to be scrutinised carefully. The fact is that 10% is being taken just from South Warrington. Figure 1 of your Green Belt Assessment Document (Warrington Green Belt boundary) shows all Warrington's Green Belt. At a rough estimate 25% is in South Warrington. Thus taking 10% of 25% is very significant. It is not a fairly distributed loss of Green Belt.

As a consequence of taking all this Green Belt from one area you have been obliged (Paragraph 85 of the National Planning Policy Framework) to delineate an area of "safeguarded land" (shown in deep pink on your plan) which is supposed to provide a barrier between the urban area and the Green Belt. However, the current Green Belt you plan to develop is doing just that obviating the need to designate any other safeguarded land.

I am a supporter of the Woodland Trust, an organisation which is worried about the impact of development on "irreplaceable ancient woodland". Lumb Brook Valley will be bordered by two separate blocks of housing and Grappenhall Heys by 3 blocks of housing. The latter has been part of my life from being a young child and I see it as a peaceful area for walking and somewhere which supports wildlife.

Equally, the Transpennine Trail is a peaceful route for recreation for walkers, cyclists and horse riders. Having no traffic it allows young children to run free. Everyone is aware of the problem of obesity in young children. Taking a safe, peaceful area for a proposed road/tramway is tantamount to criminal. This route was hailed as a huge success when it was first opened. It should not be taken from the people of Warrington. It is also a haven of wildlife, a corridor for many species.

Halton's Development Plan states that:

*"Much of the open land within the urban fringe and open countryside is designated as Green Belt in the Plan, and is protected as such. It performs a useful Green Belt function, preventing the unrestricted sprawl of the urban area, preventing the towns of Runcorn and Widnes merging with their neighbouring towns and cities. In addition to its Green Belt function, it also provides INFORMAL (my capitalisation) recreational opportunities for the Borough's residents and is an important habitat for wildlife."*

They continue to say

*"the land will remain as open countryside".*

(Chapter 3 p 92). Warrington needs to demonstrate the same foresight.

Warrington also needs to consider the loss of INFORMAL (not manicured) recreational opportunities and loss of habitat for wildlife. Once gone they cannot be replaced.

### **ECONOMIC GROWTH**

Warrington, along with Manchester and Liverpool, has been a boom town over the last two decades. It is questionable whether that growth can continue at the same rate.

Other towns in the North-West desperately need that growth. Councillor Fulham (St Helens) said

*"Warrington, Liverpool and Manchester have been transformed over the past 15 years.....it is now St Helens turn to capitalise and capture the growth that has been going on around us."*

He has highlighted that our two closest cities along with our town have prospered. We do not need further growth but other deprived areas do.

Further afield, the North-East of England desperately needs economic regeneration and would, no doubt, welcome the opportunity for more housing and employment opportunities.

Warrington may have some jobs growth but not at the rate it has experienced in the more recent past. I do not believe that the bulk of the housing development in the plan will contribute to Warrington's economic growth. With easy access to the motorways many people will choose to live here but work elsewhere.

Currently Warrington's town centre is so run down that no one in the area uses its facilities and residents of the proposed new housing won't use them either. The Golden Mall, built as a regeneration project in the 1970s, has many empty shops. The latest to close its doors, Marks and Spencer's, follows the loss of BHS and other units remain empty. Bridge Street, once a thriving shopping area, is becoming derelict with the exception of the town's one independent store, Hancock and Wood.

The on-going town centre development will contain a multiplex cinema and family eating places. How soon will it be before that, too, falls into disrepair?

The town has no theatre and, although we have a so-called Cultural Centre this is



considered a joke by most people. There are boarded up houses in Museum Street at the heart of our so-called Cultural Centre. Winmarleigh Street, just round the corner from the Pyramid Centre and Parr Hall is full of homeless people.

Warrington Library, the first rate supported library in the country, was only saved by public demand. Many of Warrington's historical buildings, which would have brought visitors into the town, have been demolished in the drive to be modern. All these decisions have combined to drive people who would have spent money in Warrington to spend it elsewhere.

It is **idealistic** to think that the housing development in South Warrington will grow the town's economy. **Realistically**, money will be spent in Manchester, Liverpool, Chester and the Trafford Centre. The two major cities of Manchester and Liverpool are on our doorstep and thriving, and the good existing road network will attract both Warrington's future as well as current residents disillusioned with our town centre.

All the above will lead to economic stagnation not growth. People need their minds feeding not just their bodies. I see no proposals in the development plan for any of these vital facilities.

#### **TRAFFIC ISSUES - PUBLIC TRANSPORT**

A detailed traffic survey has not been undertaken. This seems to be the wrong way round in terms of planning. Such infrastructure needs to be in place before any housing development.

It is obvious that new transport routes need to be provided to service the massive increase in housing and, despite no proper traffic survey having taken place, your map (Figure 3.5 Conceptual Approaches on p 31 of the South Warrington Urban Extension Framework Plan Document) shows a proposed bus route taking in both Stockton Lane and Broad Lane in Grappenhall.

Buses cannot travel over the hump-back bridges because of the weight limit and so have to be contained within this small area. This means that buses will be travelling through one of Warrington's prettiest and most historic villages. Visitors currently travel to Grappenhall village because of its beautiful features (historic church, country pubs, cricket ground, walled garden, canal walks etc). The proposed bus route will destroy this.

Currently Stockton Lane, which is narrow, is considered so dangerous at the Stockton Heath end where it runs close to the Bridgewater Canal (another beauty spot) that it has been blocked by a gate to prevent through traffic and prevent accidents. It seems incredible that a bus could travel along this lane.

I see many buses already travelling to and from Warrington, the only passengers being the retired who get free travel. We do not need yet another loss-making bus. The **reality** is that people do not and will not use public transport, preferring to travel by car. As an example, stand outside any of the local schools in a morning or at home-time and note the number of cars jostling for parking space. Many of the children live within walking/public transport distance of the schools but choose to travel by car. It is **idealistic** to think that the new residents will use public transport. On top of this the suggested extension for transport over the Manchester Ship Canal will not only suffer the same fate of all our public transport but will also be so costly that it will not be viable.

In WBC's Local Plan FAQs documents you state that

*"a THOROUGH (my capitalisation) public consultation on all transport schemes which are needed to support the Local Plan once it is adopted" will be undertaken.*

Whilst good in intention this is too little too late. We should have had a THOROUGH consultation on the whole of the PDO.

#### **TRAFFIC ISSUES - PRIVATE TRANSPORT**

As previously stated, no matter what public transport is provided, people will choose to travel by car. Most households today own 2 cars. 24,744 houses will therefore generate approximately 48,000 cars. It does not matter how many new roads are built they will immediately be saturated by cars. Warrington already suffers from congestion and the new roads will not alleviate that given the number of extra cars on the roads. As you propose to provide 26.95Ha of employment land in the "City Centre" and 99.83Ha of employment land in the Waterfront development and 116.8HA of employment land in the "Garden City Suburb" the roads will be permanently clogged.

#### **POLLUTION AND AIR QUALITY**

Air pollution is recognised as an important contribution to respiratory illnesses, to heart disease and even cancer. 4.8% of deaths in Warrington were caused by air pollution, a figure slightly higher than the North West average of 4.6%. In 2015 WBC measured Nitrous Oxide in 47 places around the town and found that 60% of those sites had pollution levels higher than their own objective. In 2014 only 17% of the sites exceeded their objective. The World Health Organisation stated that Warrington was the second worst place in the North West for breaching air pollution safety levels. The pollution levels will increase even further if this development goes ahead.

#### **DRAINAGE ISSUES**

Our fields absorb a large amount of rainfall and save the area from suffering from flooding. Our drains currently only just manage to cope with any water on the roads. Areas which are concreted over allow nowhere for excess water to be absorbed. The result will be flooding.

## **INFRASTRUCTURE**

The PDO shows extra schools, health provision but there is no mention of hospital facilities. Warrington Hospital is struggling now to cope with demand. It cannot possibly cope with a rise of 25% in Warrington's population and it has nowhere to expand.

## **CITY STATUS**

I went to 3 of the presentations and at each one was told there were no plans for Warrington to become a city yet you describe one of the developments (coloured in brown on your map) as the "City Centre" rather than town centre. The South Warrington development is referred to as a "Garden City Suburb". This suggests to me that Warrington wants to grow into a city.

Indeed, as reported in the Warrington Guardian (25th June 2015) our Council Leader, [REDACTED] said:

*" Warrington is the largest 'city' in Cheshire. We've a bigger population than Chester. We are also bigger than cities like Oxford and Aberdeen among others.....We are already established as the leading city in terms of economic growth in the North and, in fact, one of the leading cities in the UK."*

Note how many times he refers to Warrington as a city. This is further proof of our council's desire to make Warrington a city and I query whether some of the desire for expansion is driven by a misguided idea of becoming a city.

Can we really aspire to be a city without a cathedral, a theatre, cultural activities or a decent town centre?

On top of this we are situated between 2 major cities, Manchester and Liverpool, which have cathedrals, museums, theatres, historic buildings and thriving shopping - all the things we lack. We cannot compete and have nothing which deserves city status.

Most importantly, of course, is that the residents unlike the council have no desire to live in a city.

## **THE IMPORTANCE OF QUALITY OF LIFE**

Twenty years of constant disruption brought about by construction will cause misery to all who live in the area. All the traffic generated by extra cars, the traffic noise, the pollution from traffic will lead to a deterioration in people's health and welfare after the building has been completed.

What good is there in living in Warrington if there is no decent quality of life?

