



11th September 2017

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 Preferred Development
Option Regulation 18 Consultation July 2017**

As I understand it, the position the major intervention proposed in the draft plan is the development of a new Garden City Suburb comprising 7,274 new homes and 116ha of employment land between Knutsford Road and London Road linking the existing urban area to the M56. This new development will almost exclusively be on land currently protected as green belt. You also propose to protect for future development land, currently allocated as green belt, east of Knutsford Road and the M6, with the potential to accommodate a further 1,831 homes.

The draft local plan acknowledges that Warrington's roads, schools and health facilities are currently at capacity and that a development which could accommodate something of the order of 30,000 people and 13,000 cars plus commercial traffic could not be feasible without significant investment in both transport and public services.

I have a number of reservations about the Preferred Development Option

1. 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 Garden City Suburb is largely located on green belt land, is not brownfield, is not accessible by public transport and will contribute to deterioration in air quality. It does not therefore meet any of the 2012 criteria and it is not clear from the current plan why such a major departure from these policies is justified.

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 change envisaged to the green belt.

2. 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 of 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..

3. Provision of New transport infrastructure and Public Services.

Having examined the criteria for the Government’s Garden City programme 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 new suburb, which is separated from its 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.

The preferred development option recognises that strategic road infrastructure and a new crossing of the ship canal may be required but is vague on the any details. The plan further suggests that no development of the garden city suburb will take place until a new strategic road is provided. I am skeptical that these proposals will survive contact with market reality. The new strategic road and bridge infrastructure 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 Garden City Suburb allocation will place intolerable pressure on roads and public services which are already operating at capacity.

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

The preferred development option 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.

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.

I hope that you find the above comments of assistance and would be grateful if you would kindly keep me informed of the Council's response to the consultations.

Yours Faithfully

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