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28/9/17

Dear Sir /Madam

I am writing in response to the Regulation 18 Consultation on the Warrington Borough Council Local Plan.

I consider that the proposals to release green belt land are ill-conceived and, in all probability, not required. The Consultation documentation is such as to make it virtually impossible for a non-specialist to get to the bottom of the calculations and reasoning behind the Council's proposals: not only is there a substantial amount of jargon included, but the sheer volume of the documentation is enormous and not readily digestible.

Green belt land is a precious resource. Once it is gone it cannot be retrieved and returned to its former state. The consultation document (at para 4.10) refers to "exceptional circumstances": I have seen nothing in the documentation to persuade me that there are any exceptional circumstances that merit developing green belt land.

The quantity of land required for the next 20 years is understandably uncertain, and the methodology, judging by the early part of the report, open to question. Why then, does the Council not wait for the standard government methodology that is noted in paragraph 2.10 as being due to be consulted? Why set hares running, knowing that the figures will need to be reviewed in the near future?

Paragraph 3.4, referring to the amount of housing that might be provided on green belt sites, also causes me to question how accurately the capacity of the non-green belt sites has been calculated? Using average site areas and average density figures is somewhat lazy, and unlikely to provide an accurate answer. If the aim is to use as little green belt land as possible – as I believe it should be – then it is important to have a greater level of precision.

Another factor that I assume will affect the calculation of land requirement is the provision of "affordable" housing. I presume that, on average, a greater housing density is achieved when building affordable housing, as compared to sites where developers are seeking to maximise their profits. It would be naïve to suppose that developers would not wish to do so – and I rather suspect that their desire to be able to develop green belt sites is because houses built there will be marketable at a higher price.

The consultation document makes a number of references to urban and brownfield sites, but does not – as far as I can identify – provide a rigorous investigation and analysis of the number and capacity of such sites within the Council boundaries. I am sure that the vast majority of residents in the Borough would strongly prefer that such sites are used to provide as much of the required housing as possible.

The proposed objectives, at Para 4.38 of the consultation, refer to the “unique pattern of green spaces” in the Borough. It is not tenable to suggest that green belt land could be developed without affecting that. In my view that is particularly true in the urban and suburban areas of the Borough. A couple of fields in a town may seem insignificant, but the juxtaposition of these green spaces with the developments around them is what makes them particularly valuable parts of the green belt.

The proposed alignment of HS2 runs through the Borough, and whilst it may be subject to minor changes, it is already affecting the housing market in the vicinity of the expected route. It will also run through a number of areas of green belt and farm land, leaving them unrecognisable from their current state. It seems to me that it would make a great deal of sense to recognise that these areas could be developed in the future, avoiding the need for yet more areas of green belt to be built on. The Councils plan seeks to identify land requirements for the next 20 years and yet makes little or no reference to this opportunity.

The plan also makes brief reference to Fiddlers Ferry, but effectively opts not to include any useful attempt to quantify the opportunities there, citing the uncertainty of the future of the power station. Which begs the question, why are the Council seeking to make hard and fast changes to green belt land based on 20 year forecasts? There is certainly a huge amount of uncertainty in forecasting so far into the future!

All the points that I have made above are general in nature. I do have a number that are more pertinent to where I live, in Lymm.

Lymm is a “desirable” place to live, as any Estate Agent will say, and I acknowledge that I am fortunate to live there. It is, however, that desirability which will prompt developers to press particularly hard for the chance to develop on green belt sites, recognising the potential for substantial profits. Given that the plan seeks to provide sufficient housing for the future needs of the borough, it would be entirely inappropriate to do so in a way that gives a disproportionate benefit to the developers. Furthermore, the provision of more expensive housing is less likely to benefit Warrington in terms of work force / employment, as a greater proportion of the owners of such houses might be expected to travel greater distances to their places of work.

It is already the case that the owner of the green belt land behind our house (R/18/117) has made numerous applications to develop the site and the adjoining ones (R18/118 and R18/018). These have thus far been unsuccessful, recognising the value of this green belt land. I trust that any assessment that the council has undertaken of the land has been based on what the planning permissions are for the area, rather than the uses that regularly appear to flout these permissions.

The assessment criteria contained in the Consultation document also throw up concerns about developments within Lymm:

- W2 Green belt implications – negative for all the sites mentioned above;
- W4 Secondary school implications – as your documents record, Lymm High School is already at capacity and forecast to remain so;
- W4 Health facility implications – the existing Doctors’ surgeries in Lymm are, I understand, fully subscribed;
- W4 Local Road Network – Rush Green Road is overcrowded and frequently jammed. Lorries and buses can barely fit down parts of the road, which also a busy route for children going to/from primary and secondary schools;
- W4 Public Transport – the level of bus service through Lymm is limited;

- W4 Open Space, Sport and Recreation – the sites mentioned above all border the canal, which is a popular route for walking. Development on these sites would have a negative impact on that facility.

I firmly believe that the development of green belt sites should be avoided as far as is humanly possible. It is a fallacy to say that some such sites are bounded and therefore less important: it is merely another step in the gradual erosion of green spaces.

The Consultation Report (at para 4.41) says that the Council believes that not releasing green belt land will have consequences “likely to include severe congestion on Warrington’s transport network, a risk of worsening air quality, increasing pressure on school places, health facilities, sports and leisure facilities and other community facilities..”. I’m afraid that the Council have got that the wrong way round. Releasing green belt spaces – certainly in Lymm, but doubtless elsewhere as well – will:

- Worsen air quality as towns lose green spaces;
- Increase pressure on school places – there are no places available at Lymm High School for a larger population than at present;
- Increase pressure on Health facilities – already fully subscribed in Lymm, so unable to cater for an increased population;
- Increase pressure on sports and leisure facilities; and
- Increase pressure on community facilities.

How can increasing the population of an established town do anything other than increase those pressures? How can more people driving more cars and using more fuel do other than worsen air quality? To repeat my opening statement: Green belt land is a precious resource. Once it is gone, it cannot be brought back.

Yours sincerely

