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WARRINGTON
Borough Council

Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

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2: Questions

Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Response: The current proposal aims for more than the minimum amount of homes possible under calculations of our centrally assessed need over the next 20 years: 24,000 as opposed to approximately 20,000. Whilst we understand the council faces huge financial pressures, and there may be some economic benefit for both adding more homes, and submitting an overpopulated Local Plan, we would be in favour in any potential reduction in those numbers.

We also feel that maybe there is an underestimation of the sheer amount of jobs likely to reduce over the next 20 years due to automation. The latest report by PwC found that 30% of jobs in the UK will be at risk, with potential reduction in up to 10 million jobs over the next 15-20 years. Warrington has large amounts of businesses involved in transportation and storage, and administration and support services. These are estimated to have a high risk of seeing reduction in employment jobs of 55% and 35%, respectively.

Ultimately though, we would encourage the council to aim for the minimum number of houses allowed, to reduce the huge burdens on infrastructure and green spaces.

Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

Response: It remains unclear to us exactly what decisions are going to be made over established Green Space within the built up area. Are new homes and employment premises going to be located in recently vacated land, or in green spaces. We have read your Arup survey, and visited your planning department in June to discuss the issue, and feel there remains a worrying lack of clarity over protection of green space, both locally in Latchford, and as a wider concern across the borough.

Generally we are not opposed to new development of existing or derelict areas of built land: brownfield sites. Denser residential areas may be needed, indeed, more higher build constructions will likely be necessary.

However, any space that has historically been green, or that may have had some other history, but in recent decades has been used regularly by the public as Green Space is incredibly valuable to our town. Indeed, it is important that we consider that denser residential areas need a corresponding increased access to Green Spaces, as residents will not be as likely to have gardens and open space.

In our visits to the public consultation, little was available regarding proposed plans on land within the town limits, and areas such as Westy Point, Latchford Trail and Westy Woods, whilst being contiguous with The Eyes Nature Reserve, were apparently not classed as green belt but as areas within town itself. Will they remain as green space?

Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

In short, No, we don't think there has been an appropriate assessment of this issue.

When the word safeguarded is written with quotation marks around it, it also raises concerns as the council's actual commitment to long term permanent preservation of green space. Is it going to be safeguarded, or "safeguarded".

For example, our focus as an organisation is on areas of green space within Latchford. There are several areas of green space that do not appear to have been classified as such when considering the green belt – areas such as Westy Point, Latchford Trail and Westy Wood are not marked within zones in GA1 or GA2 maps in the Arup survey page on page A1. This concerns us both locally, and across the town as to whether land may have been misclassified, thus reducing its protection.

In terms of appropriate assessment: have local resident led groups been contacted prior to the plan being formalised? We were not asked for input, and are not aware of such a consultation with other groups.

We also question the need for such a large amount of development in the South East generally. Warrington is not a notably pretty town, not blessed with some of the beautiful scenic views that towns in South Wales and the Lake District often are. Yet the Appleton region is a jewel, and one that perhaps deserves more preservation than some other areas of Green Space, if belt loss has to occur. We are not disputing that development needs to happen in the South East, just asking that it be as little burden on green space as possible.

We are concerned especially about Latchford, which has had more than its share of new development in recent years, putting further burden on our already strained infrastructure. We are also aware that development in Appleton is likely to add to this pressure.

Question 4

Do you agree with the new Local Plan Objectives?

Yes, these appear to be a balanced approach to a difficult issue.

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Option 2 appears to be the most appropriate option, yes.

We are in favour of incremental growth throughout, but are concerned that existing green space within the town borders may not be seen as a priority.

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

As with point 6 above, spatial option two appears to be the best available route for development. What we would like to comment is how there is a plan at all for a “main development location”. Incremental growth around the town would serve that vision much better, which may fit more with be development option 5, rather than development option 2.

Option 2 does not seem to resolve a practical approach to how congestion in Latchford and Bridgefoot could be significantly reduced. New residents in the South East would still need to use these routes to access the town centre and interior routes. Travel to the West of town will be eased by a new road built there, but putting so many new homes with their key routes into town already congestion hotspots is a big concern.

Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

No. Aside from our earlier raised concerns about employment estimates for the next 20 years, South East Warrington is already a difficult area regarding congestion.

For new residents, a majority of whom will commute to Manchester, Liverpool or the industrial estates, access to the M62 and the Omega would be seen as particularly important. Additional weighting to sites in the North and West might better provide this.

We do appreciate the plans for preserving green space and corridors in the newly planned spaces, but think that our input into this would be more useful once the final sites are confirmed, as the sheer size of the loss of green belt around Appleton is a concern.

Again, we wish to stress that we appreciate the council faces a difficult task regarding Warrington's future development needs, but we remain concerned that "development needs" will always have a higher priority than "green space needs". There will always be new opportunities for development, but once green space is lost, it is very rarely regained.

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

Understably, as a resident led group focussing on Green Spaces, preservation and regeneration of green spaces is a huge concern for us.

We do not feel there is enough detail on this in the current proposal. Exactly which green spaces are planned for development, and which for preservation? Because this shouldn't be a plan to preserve some bits for a while, but to say "These are the Green Spaces of Warrington, a heritage for our town (and eventually, city) into the future".

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

No, these seem reasonable.

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

We believe that Green Space is an incredibly important, often overlooked resource.

Green Spaces represent areas of environmental resource, alongside their many social, health, economic and cultural benefits. One of these is as flood plain, as buffers against rising water levels, areas that can flood.

Clearly your waterfront development avoids much of the heavier areas of flood risk, there are several large industrial developments planned on Flood Zone 2 and 3 areas. Most alarmingly, searching for mention of flood risk assessment finds none in the current document.

We would expect to see an independent long term model of assessment of the entire development plan, not just “Will these new buildings flood”, but “50 years from now, when sea levels have risen, will we see increased flooding *anywhere* in Warrington as a result of these developments”. Throughout the UK, we are a ticking timebomb of unwisely building on flood plain. Will the councils and residents of the future be saying “What on earth were they thinking?”.

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Response: We have covered this in a fair amount of detail in question 6.

In short, incremental growth around the town would seem to serve our town's future better.

We do appreciate the plans for preserving green space and corridors in the newly planned development, but think that our input into this would be more useful once the final sites are confirmed, as the sheer size of the loss of green belt around Appleton is a huge concern, and we would prefer that development to be as smaller in area scope to reduce its devastating environmental impact. One solution would be denser housing also, fitting more homes into a small space to increase the preservation of green belt around, and green space within.

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

**Response: This seems more reasonable in size than the South East proposal, and well situated to apparently avoid flood plain, according to the Gov.uk flood risk map :
<https://flood-map-for-planning.service.gov.uk/summary/359474/387114>**

Question 13

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Response: We love the surrounding settlements, and many are surrounded by beautiful green space, but we do feel that a more proportionate plan would see perhaps an additional 500-1000 homes in these locations to more fairly share the burden of new construction, and more evenly preserve green space across the town.

Question 14

Do you agree with our approach to providing new employment land?

Response: We have previously mentioned concerns about flood risk, especially on the new port regions. As previously said, this land use can increase flooding elsewhere.

It is also noted that several large regional organisations (one example being Peel Ports) own much of the land close to water that they aim to develop.

In exchange for the large amounts of profit that will be generated for them with new developments, we would be keen to see WBC use these times as an opportunity to gain some form of binding commitment to green space preservation of current spaces within the town and more willingness to relinquish or maintain some of this land for green useage.

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

Yes

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

We are not experts on this field, but there doesn't appear to be a cause for concern, if complying with government and environment best (not minimum) practice recommendations.

Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

Response: Declaring Warrington to be a Town of Green Spaces, or similar. Our concern is that if we travelled 100 years forward in time, how much green space would remain? We understand that developing on green belt is unavoidable, but maximising land use without degrading our environment needs to be of the highest concern.

Following up the recent Green Space Audit with a plan to clearly mark which areas of green space will be permanently preserved for future would be a remarkable feat of town planning. It would be likely to make Warrington very notable compared to many other towns and cities. We would be honoured to help participate in this, and in overcoming any hurdles that would ensue.

Also, we ask for a serious look at where Warrington's flooding strategy takes us in the next century seems vital. Nearly a quarter of new UK homes this century have been built on flood plain, and sea level is estimated to rise an absolute minimum of a foot over the next 100 years. This is clearly an utterly short sighted approach, and rather than accepting the status quo, you could choose to very wisely challenge it, and ban any new construction on flood plain. Again, this would, sadly, be an entirely notable and sensible achievement.