From:
To: Local Plan

Subject: Objection to the Local Plan

Date: 15 June 2019 13:23:26

Dear Sir/Madam

I wish to object to the Local Plan on the grounds that I believe the plan is not sound, the requirements are not justified and I do not believe it can be delivered as proposed. It does not deliver on its strategic aims to provide new infrastructure and services to support Warrington's growth, reflect and preserve Warrington's distinctiveness, and minimising the impact of development on the environment.

The reasoning behind these objections are as follows:

Number of houses

The number of houses included in the Local Plan is still unnecessarily high despite revision from the original PDO. The small volume of houses built each year in Warrington (359 in 2018/19) is indicative that there is not the demand to warrant so many houses (945 or 1656 a year). It is not justified for the predicted population growth of Warrington. These houses would not be meeting a need from the residents of Warrington, but of others outside the area who would commute out elsewhere. The amount is acknowledged by the Council as being more than that required by the Government's calculation method, regardless of the debate over the exact figure the calculation gives.

Green Belt

The leader of Warrington Borough Council, Russ Bowden, has stated that Green Belt has only been included as a last resort and every effort made not to have to release Green Belt land, however every effort would mean not building more houses than is necessary (i.e. the 4% above the government minimum target) and not having a local plan which was for 20 years instead of the normal 15 years for Local Plans, during which time new brownfield options would come available and be considered and the Green Belt could be protected.

7,400 of the proposed houses would be on Green Belt across Warrington and a large area of Green Belt in South Warrington used for employment.

I do not feel that the plan is based on sound justification for releasing this Green belt land. These developments constitute urban sprawl, are actively merging settlements in South Warrington, encroaching on the countryside and is not assisting in regeneration. Brownfield options need to be exhausted before Green Belt is considered, and I do not believe that they have been- Lovely Lane hospital and Fiddlers Ferry becoming available for example. These are significant areas of land which could provide the location for a large number of housing or employment areas.

The reduction of Warrington's total green belt by 11% is mostly targeted in South Warrington, which will have huge detrimental impact on the character and on the residents of the area. If Green Belt was the only option to meet the mandatory numbers of houses required, which it is not justified in being, then the Green Belt land used should

be more evenly shared across the Warrington area and not so predominantly in South Warrington. This would reduce the extent of the impact on one particular area.

Environmental Impact

I have serious concern about the irreversible nature of releasing Green Belt for development.

At a time when there is global concern about pollution levels, and demand from the public leading to the government now setting the net-zero emission target for 2050, I question the soundness of this Local Plan given its proposal to destroy huge areas of Green Belt taking with it the trees needed to help absorb pollution. Warrington should be participating in the Northern Forest scheme to plant 50 million trees over 25 years, with funding from Defra, instead of removing Green Belt.

There will be a serious ecological impact from this Local Plan covering so much Green Belt land, with species such as Yellowhammers who rely on open fields, being severely impacted as their habitats cannot be mitigated by country parks where dogs would be exercised freely, restricting what wildlife could live undisturbed. Country parks do not replace open countryside and footpaths through fields. Neither do urban trees replace those in rural forests, growing fast but dying young and leading to a net loss of street-tree carbon storage over time, as identified by a study published on May 8 in PLOS ONE by Ian Smith of Boston university (as reported in SCIENCE DAILY article published on May 8 2019).

Critically the proposal to develop Port Warrington over much of Moore Nature Reserve is especially alarming. This is an area of significant ecological diversity with resident red list species such as Lesser Spotted Woodpeckers and Willow tits, as well as bitterns. This is a wet woodland environment which is increasingly rare and cannot easily be recreated. Looking at Peel Holdings proposal in the consultation documentation, the proposals cover the loss of the main lake alongside Lapwing Lane, and the land and woodland on the opposite side of the road, which cannot be mitigated by providing a neighbouring country park on what is a landfill site currently, and therefore a hill.

Furthermore the Local Plan puts additional vehicles from the additional houses, and HGVs from the proposed warehousing employment areas, on to an already overcrowded road network. This will make the air pollution levels in the area even worse than the already high levels they are as per recent figures highlighting Warrington as having the worst pollution levels in the North West. Particulates from HGVs are a specific concern in these pollution levels, and this plan only makes that worse by encouraging haulage businesses to expand in the South Warrington area through the proposed warehousing areas. Proposals for employment areas should be infrastructure led with detailed environmentally friendly transport solution plans being put in place and delivered ahead of the development of properties. The plans are just exacerbating existing problems without attempting to address the real issues such as the unique nature of Warrington's siting on a number of different waterways and surrounded by motorways.

Impact to Health

I am especially concerned as a mother of a three year old daughter about the pollution levels in Warrington and the impact to mine and my family's health. There would not just be physical health impacts of air pollution, but also the mental health impact of not having the open space and countryside that is so frequently recommended to people to help them ensure good mental health.

In a world where mental health is such a hot topic given people's stressful busy lives, and research such as that published in the Scientific Reports journal on 13th June 2019, recommends that a two hour dose of nature a week significantly boosts health and wellbeing, this Local Plan wipes out huge areas of open countryside in South Warrington, where people go to walk their dogs, or as we do, bird spotting at Moore Nature Reserve, or running alongside our daughter on her scooter around the Pewterspear Green area, or go for jogs, or just family walks, to give ourselves that fresh air that we need and clear the cobwebs away. These proposals would force us to travel further afield for nature time, or else have to make do with crowded country parks full of dogs. The heart of Moore Nature Reserve would be gone – a place I have visited since a child with my parents, spotting nesting Tawny Owls, barn owls and woodpeckers, thousands of baby frogs, numerous waterbirds and birds of prey in the lakes, woodland and field that the expanded Port Warrington would be built on. This is not something that can be easily replaced and holds special importance to the hundreds of people who visit it regularly, my family included.

Instead of running through the long quiet avenue of trees at the back of the Pewterspear Green development, we would be running alongside a dual carriageway as per the Local Transport Plan, inhaling car fumes, and no doubt HGV fumes that would utilise the strategic transport link to cut through to the Appleton Thorn Industrial Estate.

Infrastructure

The Local Plan is proposing to develop heavily in areas with poor non-vehicular transport links such as South Warrington and busy failing motorway infrastructure where almost daily problems lead to people diverting off the motorways and through Warrington. The scale of development warrants infrastructure changes to be made first given the situation is overstretched and I question the soundness of the logic that South Warrington's transport infrastructure is able to cope, especially given that Warrington Borough Council has itself recently acknowledged that the Western Link will not solve Warrington's problems.

Even the Local Transport Plan 4 proposals are not sound given they lack the detail on whether another Ship Canal crossing will be required for the number of houses being built in South Warrington, or how the Mass Transit infrastructure will be delivered and funded. They are heavily based on the assumption that residents in the area will walk and cycle more, yet this is a hilly area and cycling for those who do not cycle as a hobby, is just not realistic.

Reviewing the Infrastructure Delivery Plan demonstrates that there are is no clarity on the means of delivering the proposed infrastructure for the Country Parks and schools for example. The funding is stated as not yet confirmed and subject to ongoing discussions. I

am concerned that it will be delivered too late and potentially insufficiently to meet the proposed demands. My daughter is three years old and we will be directly impacted by the increased number of households proposed in terms of ensuring a school place for her, from as early as primary school given the house building already taking place in Pewterspear Green and no doubt shortly for Grappenhall Heys and Appleton Cross, but for High School, where Bridgewater High School is the current provision for secondary education for South Warrington south of the Ship Canal.

It is already problematic trying to get an appointment at the doctors in Stockton Heath, but without the delivery of neighbourhood hubs in these new Garden Suburb communities, the demands will only be worse on Stockton Heath facilities – the shopping and car parking facilities as well as the doctors.

Even provisions for new mothers need to be improved quickly – having signed up for waiting lists at the West Sure Start Centre for baby massage and baby sensory classes 3.5 years ago when my daughter was born, I was never offered a place on the classes, as priority was assumedly given to people in the less affluent areas of Westy and Latchford over Stockton Heath and probably neighbouring areas south of the canal. This lack of funding in our area is not good enough given we pay our council taxes too and should have the same access to such services and not be required to pay for private classes at a stage when maternal health is so fragile and support and socialising is so critical.

The Councils stated approach in the Infrastructure Delivery Plan to 'encourage investment in and improvement of existing infrastructure' and 'to work in partnership with internal and external stakeholders to ensure the timely and co-ordinated provision of high quality infrastructure' is just not strong enough. Given the situation we are in with Peel Holdings in South Warrington and the ongoing lack of cooperation to maintain the swing bridges, the Council has demonstrated a lack of ability to make these infrastructure projects happen.

I also question the deliverability in terms of Port Warrington plans — having attended the Consultation session at the Halliwell Jones Stadium and also reviewed the consultation documents on the Port Warrington and Waterfront, there is no detail on whether the ships would be able to turn round in this port. Peel's material itself even states the 'potential' for a turning area. Therefore these existing plans pose a significant impact to South Warrington as the ships would actually be required to travel through the swing bridges of South Warrington until they reached an area to be able to turn round and go back through the swing bridges again, disrupting the traffic once again. This is just not a feasible approach and would cause huge disruption to traffic and residents in South Warrington.

Engagement Issues

I am also seriously concerned that there are a lot of Warrington residents who are not aware of the extent of the development plans and the impact this will have on them and our town. The council letter issued out to residents just provided a formal overview that the Local Plan was being shown at the events, but many people will not understand what a

Local Plan involves and how this impacts them and that they can actually object to these plans. I know from speaking to people that there is a concern that nothing can be done and its sad, but they have no way of changing it happening. I therefore worry that there will not be the number of objections to reflect how people feel about these plans, especially given the complexity of the response form.

I also think that the planning applications for Stobarts, Six 56 Warrington, Pewterspear Green and Appleton Cross being scheduled alongside the public consultation period for the Local Plan and Local Transport Plan has further put people off from objecting to all of them. I know I have struggled to find the time to write responses to everything.

Summary

In summary I believe that that the strategic objectives of the Local Plan are not met for minimising the impact of development on the environment, given the significant impact of removing 11% of the Green Belt and proposing that a few country parks will mitigate this loss; for providing new infrastructure and services to support Warrington's growth, with a plan that lacks detail for delivery timeframes and funding; and reflecting and preserving Warrington's distinctiveness, when South Warrington will be so disproportionately impacted and its distinctive nature irreversibly changed with the merging of communities and the destruction of the Green Belt which so characterises the area. I also do not believe that the justification for the housing numbers and the growth of the town are based on sound reasoning for the numbers, the length of the plan coverage and the too ambitious growth plans for the town given what is happening in the wider region. I also fail to see the justification for release of so much Green Belt land and the irreversible damage to the distinctive character of South Warrington, along with the air pollution and environmental damage this brings.

I therefore want to see the Local Plan revised to better reflect the smaller than stated needs and wishes of the residents in terms of housing and employment areas, provide real detail about delivery, provide realistic proposals for infrastructure and better protect the climate and environmental.

Your sincerely
Helen Peers
Warrington