

# LYMM PARISH COUNCIL

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## **Warrington Borough Council's Local Plan 2017 to 2037** **Consultation Response from Lymm Parish Council**

### **INTRODUCTION**

**Lymm Parish Council does not believe that the proposals in the Plan are sound. We accept that some development is needed but we do not accept the scale and nature of what is being put forward.**

Little has changed from the Preferred Development Option. There is still a loss of large parts of the Green Belt, there is still a 'Garden Suburb' and large logistic sites. There is no clear plan to improve local roads and the character and distinctiveness of the area in south Warrington will be dramatically changed forever.

We welcome the words about 'brownfield first', more affordable housing and the importance of infrastructure but we are dubious about whether this will all happen and we do not believe enough action is proposed on these topics.

Our objections are in two parts. Firstly, we have a number of comments on the Plan as a whole. Many of these will have relevance for Lymm. Secondly, we wish to make some specific comments in relation to our village.

The Parish Council has been an active member of the South Warrington Parish Councils' Planning Group so many of our comments will be similar to those submitted by other Parish Councils in the south of the town.

### **GENERAL**

#### **Plan period**

- The Government requirement is for a Local Plan to last 15 years. Given the uncertainty of forecasting this far ahead, we believe there is no need for the Plan period to be 20 years
- This would reduce the number of houses required and in particular the number to be built on the Green Belt

#### **Economic Growth**

- The Plan is obsessed with economic growth. Of course, this is important but it must not be driven for at the expense of other things of value to people such as the quality of life and the environment

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- Growth is too ambitious. It is unrealistic and presumes levels of activity not experienced before
- Economic growth appears to be driven by housing development rather than the other way round
- Forecasts have been reduced as a result of uncertainty over Brexit but this uncertainty has worsened since the Plan was drafted and expectations should be further reduced
- Warrington is an extremely successful town with high levels of employment. Unlike in many other places, there is no need to generate a high level of new jobs
- We challenge whether sufficient discussions have taken place with neighbouring authorities about economic growth

## Housing Numbers

- A letter has been received from James Brokenshire MP, the Secretary of State for Housing, Communities and Local Government stating that housing figures are not a target and 'local authorities should make a realistic assessment of the number of homes their communities need using the standard method as the starting point in the process.....once this has been established, planning to meet that need will require consideration of land availability, relevant constraints, and whether the need is more appropriately met in neighbouring areas'
- This makes it clear that contrary to what the Council is saying, the numbers for housing laid out in the Plan are not set in concrete
- One would have expected the latest 2016 figures from the Office of National Statistics to be used as a starting point for calculating housing numbers. However, the Council has been told by the Ministry to revert to 2014 figures. This is wrong and has presumably been done because the 2016 base generates numbers that are too low
- Based on 2016 figures, the Council's Housing Strategy estimates that the population will increase by 18,874 between 2016 and 2041. Using the normal factor of 2.2 people per household, this equates to a need for 343 homes a year
- This figure is in line with recent build rates of 359 in 2018/19 and 402 in 2019/20
- Warrington's peak build was 545 in a year
- In 2025/26 there is a peak build requirement of 1656 homes a year. We do not believe this is practically achievable and cannot be delivered
- An optional 10% flexibility uplift has been included which is unnecessary because the Plan has to be reviewed every five years
- We believe the lowest number of new houses possible should be used

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## **Location of housing and affordability**

- New homes should be built near to where new jobs are being created
- There is a risk of a mismatch between the type of housing being planned for the south of the town houses (20 houses per hectare) and the jobs and associated wages / salaries for the jobs planned for this area
- Skilled workers will commute out of the area from 'commuter estates' to their jobs outside the Borough and less skilled workers will commute into the area. This is not environmentally friendly
- The position is made worse because both railway stations are in the centre of town generating more vehicular movements
- There is a huge need for genuinely affordable homes, not those at 80% of full cost
- A blanket figure of 30% for affordable housing in outer areas and 20% in inner areas is not acceptable
- The rules for affordability need to be changed such that they are based on a percentage of income rather than an arbitrary proportion of market price
- It is the wrong priority to allow developers to get their way so we end up with high value houses in the south early on in the Plan period

## **Brownfield Land**

- There is an overwhelming need to build on brownfield sites first
- This must be done before developers are allowed to take the easy and more profitable option of building high value houses on the Green Belt
- To enable town centre regeneration to take place, developers must be made to build there before 'cherry-picking' Green Belt sites
- Density has been increased in the town centre but we suggest there may be scope for increasing this even more
- The availability of the Fiddlers Ferry site is mentioned several times in the Plan. However, it is said this is a possibility for the future
- We believe that with the increased emphasis on Climate Change which is evolving on a daily basis, the time period for Fiddlers Ferry should be brought forward into the Plan period. This would potentially free up a large quantity of brownfield land
- If the Hospital moves to another site, this would also free up a brownfield site in the town centre

## **Green Belt**

- We do not believe the case has not been put forward to justify the loss of 11% of Warrington's Green Belt. This land is very precious and once taken it has gone for ever

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- Too much of this loss is in the south and if any loss is required, then it needs to be spread more evenly. However, we must stress that given the arguments we have put forward elsewhere in this Submission, we do not believe any Green Belt needs to be sacrificed
- Sacrificing Green Belt for an over-ambitious Plan will just increase the profits of developers
- The boundaries were confirmed five years ago and are supposed to last for twenty years
- The revised National Planning Policy Framework strengthened the protection of the Green Belt. Boundaries should only be altered where exceptional circumstances are fully evidenced and justified and all other reasonable options for meeting identified development needs have been examined
- Very special circumstances have not been demonstrated and we assert that the Green Belt take fails on all five tests – checking sprawl, preventing the merging of settlements, stopping encroachment onto the countryside, preserving historic settlements and assisting in regeneration

## **Employment sites**

- The Local Enterprise Partnership Strategic Economic Plan and Local Industrial Strategy identify a number of sectors with potential – manufacturing, energy and environment, life sciences, finance and business services, logistics and distribution. Warrington appears to be placing far too much emphasis on logistics and distribution. These sectors are already heavily automated and this will accelerate over the coming years generating fewer jobs
- These industries require a large amount of space and generate a large number of traffic movements on a 24-hour basis. If given the go-ahead, the perverse effect is that these massive warehouses will play a part in the continuing decline of our high streets so freeing up more brownfield retail space for housing in the town centre, lessening the need for Green Belt release

## **Siting of other facilities**

- We are pleased that a new waste recycling site is to be located in the south but there is no indication of where it might be
- Similarly, there is no indication of where the gypsy and traveller site might be
- The same applies to the possible siting of a new hospital in the south. Where would this be located?

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## Character & Distinctiveness

- In the vision for Warrington's future, it says, 'The character of Warrington's places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed'
- This completely contradicts what the Plan would do to the villages of Walton, Grappenhall, Appleton Thorn and Stretton

## Transport infrastructure

- Congestion is currently a major problem on roads in the south of the town and at Junction 20 on the M6
- Three Victorian swing bridges add to the problem and if the canal is used more as is planned, there will be even more swings of the bridges making matters worse
- If the M6 is closed for reasons such as high winds on the Thelwall Viaduct, then this causes major problems in the centre of town
- There is a new dual carriageway planned through Stretton, Pewterspear, Appleton Cross and Grappenhall Heys. Is this really an HGV link road which would become a racetrack for lorries? If so, it would be in use 24 hours a day
- There is no rail or Canal access to the proposed logistics sites meaning that all goods would be moved by road
- Other local roads are needed before, not after, new houses are built. At present there are just vague lines on maps
- We are very sceptical that the funding for the Western Link Relief Road will be sufficient. Most projects of this nature substantially overspend their initial budget and start date
- Funding has recently been provided for the Relief Road by the Government, but if the cost turns out to be higher, probably significantly higher, where will the additional funding come from and when would it be provided?
- The effect on existing roads at either end of the Link is unclear
- Similarly the effect on roads at either side of the 'cantilever box' is unclear
- No new crossing of the Bridgewater Canal is planned
- The investment in a mass transit system sounds exciting but is it financially viable in a town like Warrington which unlike a big city does not have many people travelling to the centre from the outskirts for work
- Cycling is good for health and wellbeing but not on manicured cycleways rather than green open spaces
- We welcome the publication of the Local Transport Plan (LTP4) at the same time as the Local Plan but fear it is just a wish-list of worthy ideas

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## Health infrastructure

- It is widely agreed that the current Warrington Hospital is not fit for purpose. Some of it is over one hundred years old and car parking is a major problem
- Many sites have been looked at and it is possible that the preferred site will be in the south of the Borough
- If so, the Plan says the land would be allocated in a future review. However it is not clear that the land required would still be available and not already allocated for another purpose
- The track record for the town providing timely health facilities is poor. Chapelford is the best example. Grappenhall Heys still has no health facility
- How certain can we be that developers will pay for these facilities?
- Where would the funding for the doctors, nurses and other health professionals come from? There is a current national shortage of medical staff
- Health facilities are needed at the same time as new houses are being built, not afterwards

## Education & other infrastructure

- As in health, questions arise as to where the funding for schools and teachers would come from? What guarantees do we have that these would be provided in time for when they are needed?
- With the drive to create Multi Academy Trusts outside local authority control, there is less influence for the Council to make this happen
- What about funding for social care, youth facilities, parks and libraries? Where is this coming from?

## Air pollution

- In May 2016, Warrington was named and shamed by the World Health Organisation as one of the forty places in Britain for breaching air pollution safety limits
- The Air Quality Management Area on the A49 just north of the Ship Canal has recorded levels of Nitrogen Dioxide above DEFRA limits on occasions since 2013
- Other pollutants such as Sulphur Dioxide, Ammonia and particulates have not yet been measured
- Air quality is recognised as a major problem responsible for the deaths of 40,000 people a year. In Warrington, a figure of 145 deaths has been quoted
- Air quality is a material consideration in planning terms
- The NPPF says, 'the planning system should contribute to enhance the natural and local environment by preventing new and existing development

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from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution'

- On 13 May 2019, Matt Hancock the Health Secretary ordered a review into the impact on our health of breathing dirty air. He called air pollution 'a slow and deadly poison' and the largest environmental risk to public health
- On 18 May, a global review found that 'air pollution may be damaging every organ and virtually every cell in the human body'
- It is already a serious problem in Stockton Heath and on the A49 through to Lower Walton and with an increase in the number of cars would only get worse
- One reason for the Peel Hall planning application being rejected by the Inspector was air quality

## **Environment**

- The loss of green spaces, whether Green Belt or not, has a wider impact on the look of the landscape. When entering the town, the views of the landscape are important and should not be under-estimated.
- In response to the 2017 PDO consultation, the Cheshire Wildlife Trust said about Moore Nature Reserve, 'We believe developing this site would be highly damaging to local bio-diversity.....it is not only a haven for species but a great asset to the community.....there is a bank of evidence of how visiting green spaces and getting outside helps people deal with stress and improves mental health'
- There are a surprising number of ponds that would be affected by these proposals
- We do not believe the Plan does justice to the damaging effects on the ecology of the area

## **Town Centre**

- The overall success of Warrington masks the stark differences between the outer and inner areas. There are many areas of social deprivation
- The proposals do not enough to trigger development in the town centre
- There is no definitive plan for how residents of the south would travel into the centre
- There is a severe danger that the early emphasis on high value housing in the south will just bring in people who work outside the town and who will not visit the centre of Warrington to assist the economy there

## **Deliverability**

- We have already challenged the ability for the housing targets to be met

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- The NPPF requires the Plan to be aspirational but deliverable. We do not believe this Plan is deliverable and is therefore unsound
- Some money is available from the public purse for infrastructure but most of it would come from Section 106 / Community Infrastructure Fund sources provided by developers. The size of this pot is unclear
- There is a real worry that developers would put forward financial arguments to get out of obligations as time goes by
- Housing without all the necessary infrastructure is totally unacceptable

## LYMM

### Housing numbers

- We welcome the reduction of new houses from 500 in the PDO to 430. However we believe this is too many given the new estates that have been built in recent years. We have had our fair share
- Earlier in this document, we have argued for a reduction in the total number of houses that are required and this would have a beneficial proportionate effect on the total numbers in Lymm
- The Plan period starts in 2017 so any completions from then count towards the overall target. This means that the houses at Tanyard Farm and the proposed apartments on the site of the Lymm Hotel plus any smaller developments would count towards the 430 figure
- We are greatly concerned that developers would not see it that way and argue that 430 is just a minimum figure and any past allocations should be disregarded
- The real demand in Lymm is for genuinely affordable housing. We are concerned that the 30% is not high enough

### Location of sites

- The four sites in Lymm are all in the Green Belt with the completion of the first houses by 2021/22. All the sites are to be developed within the first ten years
- This is quite unacceptable and far too easy for developers. They need to build on the brownfield sites first
- We cannot believe that once the ten years are up, the developers will go away because the Lymm quota has been completed. This is completely unrealistic and naïve!
- To many, the choice of these sites looks like 'a done deal' because there has been no input from the Neighbourhood Plan Group, the Parish Council nor residents



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- If you look at the 'Massey Brook' site plan you will see that a number of gardens from houses in Highfield Road are within the designated red lined area
- One resident has said how distressed they were to have been approached by building companies wanting to buy two acres of land legitimately owned by them
- This throws doubt on whether these designated sites are actually available for building upon

## **Neighbourhood Plan**

- Lymm has an extremely active Neighbourhood Plan Group which has been working very hard with plenty of engagement with the community
- As mentioned earlier, it is particularly disappointing that this Group has had no involvement in the selection of sites for housing
- This is very demoralising for the volunteers and reminds us of all the hard work put in many years ago by volunteers on two Village Design Statements for Lymm which were ignored by planners once completed. The volunteers were very disillusioned by this

## **Transport infrastructure**

- We are concerned about the effect on our already busy roads of the new developments but it is Rushgreen Road which is the main concern of residents
- This is very narrow in places and several new estates have been built off this road in recent years
- Many HGVs use it and weight limits are ignored
- There is additional traffic if the motorway is closed and we believe air quality is a problem especially at the pinchpoints
- There is considerable cynicism amongst residents, which we share, about the judgement of the Council's Highways Department over traffic safety issues
- There is an over reliance on recorded statistics at the expense of common sense and local knowledge
- At present it can be difficult for people commuting by car up Cherry Lane to gain access to the motorway network at Junction 20. Increased traffic will worsen the situation
- The associated policies for the sites say that the developments 'will be required to make a contribution towards the delivery of improved cycle links to employment opportunities in the Town Centre and the proposed employment allocation in the Garden Suburb'
- It is ridiculous to think that people will want to cycle up Cherry Lane and then over the roundabouts at Junction 20 to travel on to the logistics centre to work!

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## Health infrastructure

- It is stated that the GP surgeries are at capacity
- A new health facility is proposed for the Tanyard Farm site but it is not clear whether this replaces the existing two surgeries or is in addition to them
- If it is a replacement, there are issues about the accessibility of the site to older people without their own means of transport
- What about additional dental facilities?

## Education

- Reference is made to contributions from developers to both primary and secondary schools. This is welcome but has any consideration been given to the ability of the schools to cope with these additional demands?

## Other infrastructure

- Is there enough capacity in the sewerage system to accommodate the new housing?
- There are a large number of small businesses in Lymm, many of which depend on fast broadband connections. Lymm is said to have slow broadband already so will there be enough capacity to prevent an overall further slow-down?