

# Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

## Introduction

My name is Judith Wheeler and since 2015 I have been one of the three elected Borough Councillors for Appleton, Hatton, Stretton and Higher Walton, I am also Vice-Chair of Appleton Parish Council.

[REDACTED] my knowledge and love of the area has deep roots.

My overall belief is that the PSV is not deliverable, not sustainable and not sound.

There is a significant lack of detail in much of the PSV and significant omissions of background data that undermines the soundness and deliverability of its deliverability.

My view is that the PSV is unrealistic, speculative, conceptual and for these reasons, as an elected representative of c 8242 residents, I cannot do anything other than strongly oppose the PSV because to give any support to it would be a dereliction of my duties to my residents.

No resident I have met – and I and fellow Councillors have campaigned against the proposed Local Plan since 2017 - supported the Council's proposals.

All are totally horrified at the scale of development which they could be faced with and have submitted many erudite, well researched, evidence based and heartfelt objections.

# Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

## **My objections are as follows**

### **1. Garden Suburb concept and location**

The Garden Suburb concept is admirable. This is the wrong location. South Warrington is geographically constrained by the Manchester Ship Canal (MSC) and the Bridgewater Canal (BC) and the immediate local road network which has not been altered significantly since the MSC was built in the 1890s.

There are three swing bridges across the MSC in South Warrington; on the A5060 Chester Road, the A49 London Road and the A50 Knutsford Road. The ship canal and shipping movements are the responsibility of Peel Ports.

There were 15 swings pre and post peak January-March 2019, a significant decline from 2013-2014 but each swing can last for 15 minutes in which time all traffic – including buses and emergency vehicles – is at a standstill. Between the A49/A56 junctions at Stockton Heath and Brian Bevan Island at Bridge Foot (A49) a distance of about one mile, are four sets of traffic lights and two pelican crossings. Thus traffic to get moving again can take up to half an hour.

In addition, the bridges are old and frequently malfunction (get stuck is the widely used expression) particularly in very hot or very cold weather.

As the bridges are close together, two bridges can be swung at any one time thus adding to the traffic congestion.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

Warrington's Own Buses have publicly stated that a major impact on their network operation is delays caused by bridge swings.

This is not a new problem. One of the reasons the tram network which ran to Stockton Heath was discontinued was because of the unreliability due to bridge swings.

If the development of Port Warrington progresses there will be a significant increase in ships sailing up the Canal leading to more Bridge swings, leading to more traffic and more congestion.

The alternative route over the Canal is the High Level Cantilever Bridge which is: a) old (1895) and frequently needs patching up; b) single track and c) weak/weight limited

Although there is mention of a possible new bridge across the MSC to run alongside or replace the Cantilever Bridge this is just a possibility. There is safeguarded land on the south of the MSC around Ackers Road/Fairfield Gardens but there is nowhere on the north side – Station Road in Latchford to take it to.

There are no costings or timescales

The main route from south to north Warrington is over these three bridges. They are already congested at peak times and busy throughout the day. Even a lorry unloading at one of the shops in Stockton Heath slows the traffic considerably and causes tailbacks.

Very little – if any - mention is given in the PSV is given to Stockton Heath and the effects that development of the scale proposed for both the SW and SE urban extensions.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

It is almost as if it didn't exist and this is a serious or deliberate omission because the role and location of Stockton Heath is pivotal to any development on the scale proposed.

Stockton Heath is densely populated and has no room for any more housing development. It is a busy thriving village. It attracts shoppers, is emerging with a café culture and has a buoyant night time economy. It still has very much a local and community feel. Everyone in South Warrington uses Stockton Heath.

However there is a constant traffic flow through Stockton Heath both north/south (A49) and east/west (A56).

There is a traffic light controlled junction at the crossroads in the middle of Stockton Heath which has to accommodate ten possible permutations of vehicular traffic movement.

Even the slightest hold up or alteration to traffic light signalling causes traffic congestion and tailbacks.

Additionally Stockton Heath is served by a relatively frequent and well used bus route.

The traffic system through and around Stockton Heath has not changed for years and due to its configuration, there is nothing planned or proposed.

Nowhere in the LDP documentation are the cumulative effects of this recognised or acknowledged.

The failure of WBC to acknowledge the Stockton Heath factor is a serious omission

# Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

## **Policy INF 1 Sustainable travel and transport**

The PSV states

*that a fundamental upgrade of the existing vehicular movement network will be required in response to the scale of change envisaged as part of WGS. Where possible this should utilise existing road infrastructure, recognising that these corridors provide linkages to established communities and businesses. New road infrastructure will need to be phased to connect new development, create public transport loops to encourage patronage and be of a physical scale that will change over time.*

When the three Homes England developments were approved in 2017, WBC acknowledged that any more housing development would need infrastructure changes. It acknowledged that even with c925 houses, the Cat and Lion junction at Stretton (A49) was at overcapacity at times with only minor adjustments being made to it as part of the planning obligations.

The PSV fails to recognise that most traffic in South Warrington uses the A49 and exits through the Cat and Lion junction, Lyons Lane and Dingleway and other lesser junctions.

Nor does the PSV pay any attention to the crossing of the Bridgewater Canal which apart from London Bridge which is the A49 crossing on the border of Appleton and Stockton Heath, consists of 4 single lane humpbacked bridges and Lumb Brook Bridge which is height limited as it runs under the Bridgewater Canal.

# Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019



No traffic measurements exist for these and these traffic patterns and flows are not recognised in the PSV.

*WBC's Infrastructure Delivery Plan 2019* proposes a new strategic route which runs from south of the Cat and Lion junction across Stretton, Appleton and Grappenhall to join up (possibly) with the A56 to link up with the M56/M6 junction.

This route is to be in place before any development takes place but where is the evidence to show what it's purpose is and has any modelling been done?

The estimated cost for this is £93m, but currently no source of funding has been identified. Is this deliverable?

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

There is no evidence to show that this will relieve any of the existing traffic problems. The issues of traffic congestion are north south as much as east west and it will not relieve the problems of the A49.

For the Cat and Lion junction to function efficiently, the MOVA system gives priority to the A49 to avoid queuing at the slip roads to the M56 at Junction 9. However because of the volume of traffic at certain times, this fails to happen. An accident on the M6/M56 or a significant event such as the Cheshire Show at Tatton Park can lead to gridlock.

Where is the evidence that WBC have sought to model the effects of a new strategic road between Junction 9 and the Cat and Lion junction on the current traffic flows on the A49 ?

Warrington is surrounded by motorways – M6, M62 and M56 which are all at capacity.

The whole town currently is affected when there is an accident on the M6/M62/M62 which happens almost daily. High winds on the Thelwall Viaduct which either close or reduce the speed have a significant effect as vehicles seek to avoid it by getting off at Junctions 20 or 21 and travelling through Warrington.

To add a further 7,000 houses and ensuing vehicles together with large new employment areas with hundreds of extra HGV's on the local infrastructure means that this plan is not sustainable.

The PSV should therefore carefully consider the impact on carbon emissions arising from a plan to build 18,900 houses and build new economic developments focused on logistics with many thousands of

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

HGV movements per day. A carbon zero target fits much better within an overall sustainable objective rather than a growth driven objective.

### **Air Quality**

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 from contributing to, or being put at unacceptable risk from, or being adversely affected by, unacceptable air pollution.”

The PSV should therefore carefully consider the impact on carbon emissions arising from a plan to build 18,900 houses and build new economic developments focused on logistics with many thousands of HGV movements per day. A carbon zero target fits much better within an overall sustainable objective rather than a growth driven objective

However, the consequences of the LDP will undoubtedly drive air quality down even further for the entire population of Warrington. Today, the quality of the air Warrington residents breathe is at an unacceptable level and implementing the plan will make it worse.

Warrington Borough Council is aware of the poor air quality in Warrington. One reason for the Peel Hall application being rejected by the Inspector was air quality.



## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

The most dangerous air pollutant to human health is PM 2.5. Since they are so small and light, fine particles tend to stay longer in the air than heavier particles. This increases the chances of humans and animals inhaling them into the bodies. Owing to their minute size, particles smaller than 2.5 micrometers can bypass the nose and throat and penetrate deep into the lungs and some may even enter the circulatory system.

Studies have found a close link between exposure to fine particles and premature death from heart and lung disease. Fine particles are also known to trigger or worsen chronic disease such as asthma, heart attack, bronchitis and other respiratory problems.

A highly credible study carried out by researchers from Utrecht University in the Netherlands and various other European institutions and funded by the European Community's Seventh Framework Programme concluded that 'air pollution may be damaging every organ in the body and virtually every cell in the human body'. The study carried out in 22 countries on a population of 376, 521 people, was published in the peer-reviewed medical journal The Lancet.

The study found no strong association between mortality and average annual concentrations of PM10, NO2 and Knox BUT they did find a 7% increase in mortality with each 5 micrograms per cubic metre increase in PM2.5 (particulate matter with a diameter of 2.5 micro-metres) concentration. This link remained even after taking

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

into account various socioeconomic, health and lifestyle factors. The findings are reported to be similar to those of a recent pooling of studies looking at the effect of PM2.5 on death from any cause.

Warrington had the worst rate of small particulate pollution in the UK for the small particulate PM2.5 in 2018.

See the table below:

City or Town	Average Annual PM2.5
Warrington	14µg/m <sup>3</sup>
Bristol	13µg/m <sup>3</sup>
Stanford-Le-Hope	13µg/m <sup>3</sup>
Storrington	13µg/m <sup>3</sup>
Swansea	13µg/m <sup>3</sup>

Data taken from WHO Ambient Air Quality Database v11 published on 29th May 2018. British towns and cities drawing or exceeding the WHO limit of 10µg/m<sup>3</sup> of pollutant PM2.5. Source:

<https://www.comparemymove.com/blog/your-move/worst-air-pollution-cities>

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

With reference to the Air Quality Action Plan (AQAP) 5.3.2, WBC state:

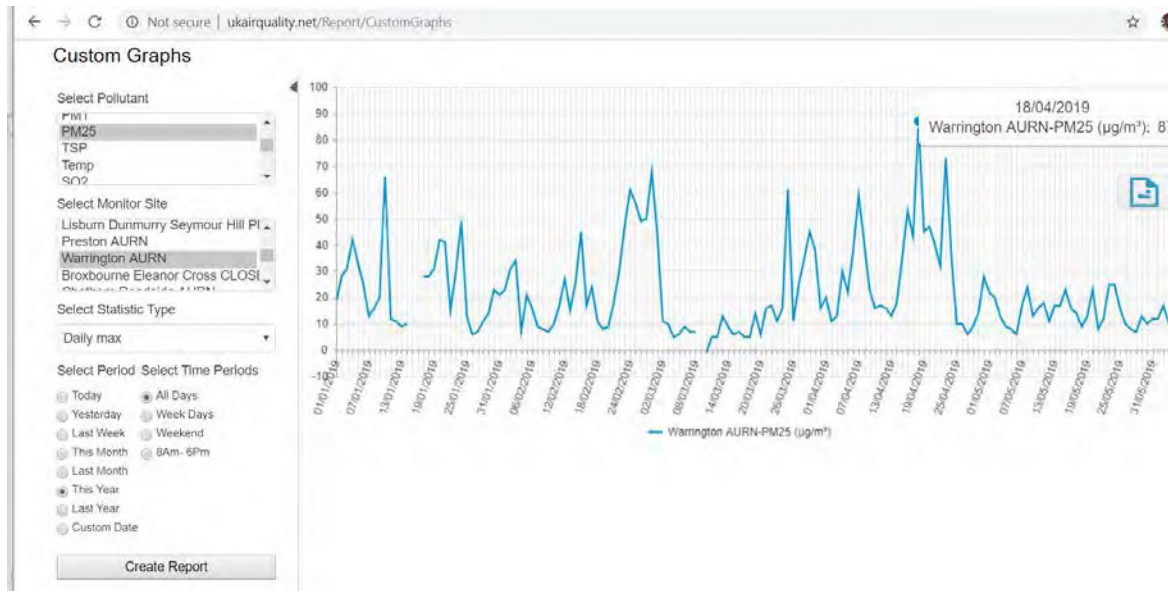
“Whilst the focus of the AQAP is to reduce NO<sub>2</sub> concentrations within AQMAs, there is strong evidence of the health impacts from PM<sub>2.5</sub>. Currently there is one urban background monitoring site measuring PM<sub>2.5</sub> within Warrington. There have been no assessments of any ‘hotspots’ where concentrations could be raised.”.

WBC were aware of the data. In 2016 WBC were named and shamed by the World Health Organisation for breaching safe levels of PM<sub>2.5</sub>. Since then, nothing has been done, even though PM<sub>2.5</sub> has been continually monitored.

Looking at recent live data from the Selby Street monitor it is easy to see daily hotspots (between 30 and 85 ug/m<sup>3</sup>) which are well over the acceptable limits. Using US EPA / WHO Standards, the current limits within the town are regularly at a dangerous level, at times only just below those of the developing world where unrestricted fossil fuels use is prevalent. This graph shows daily maximum readings for 2019, the highest being 87ug/m<sup>3</sup>.

# Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019



The network of sampling sites is not comprehensive, and it is noticeable that there are no monitoring sites south of the Manchester Ship Canal. This means that no data has been collected on one of the main arterial routes into Warrington which passes through both residential and commercial areas. The omission, and lack of will, to gather data in and around the M6, A49 and Stockton Heath means that the air quality data provided by Warrington Borough Council is only a 'partial' picture and, therefore, cannot be relied upon to provide a clear overview of the real scale of air pollution in Warrington.

The LDP is predicated upon bringing a further 7,400 houses and associated vehicles, as well as developing large employment areas which by their very nature will bring a significant number additional of HGV's into the town.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

The plan for the Western link will mean that there will be more than 1,000 HGV vehicular movements in a 24-hour period. Just as an illustration, the planned Six:56 development has 2,400 car park spaces. It is estimated that the employment development area, being almost exclusively based on logistics and warehousing, will generate an additional 2,000 vehicular movements *per hour* onto surrounding roads and junctions in what is to become the designated residential Garden Suburb.

The mortality figures quoted in plan relate to 2013 and 2015. Why is it that the plan is using old data when there is up to date evidence giving a more accurate picture? If particulates increase there is a comparable rise in mortality rate which indicates that these two facts cannot be separated. The LDP states that in 2013 4.8% of all mortality in the town was attributable to man-made particulate pollution and is equivalent to 95 premature deaths. One premature death from air pollution is not acceptable. By pushing this economically driven/developer-led plan, is WBC condoning these deaths and saying that 95 premature deaths is acceptable? These deaths were in 2013 before Warrington was named and shamed by the World Health Organisation. Up to date 2019 data shows that WBC is the worst offender in the UK. Air pollution is invisible so often goes unchallenged. WBC has a duty of care to its all of its residents and needs to ask itself if this is too high a price to pay for economic 'progress'. This is an issue for the whole town; a curtain

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

cannot be drawn along the ship canal, the pollution will kill people in north and south Warrington.

Warrington is unique in the fact that it is surrounded by an extensive network of motorways. The 17-point Air Quality Action Plan in no way mitigates the extent of the pollution that will be generated over the next two decades if this plan is passed.

The LDP which will massively increase the levels of traffic and HGV's. The town has already been identified as the worst in the country for small particulate pollution (PM2.5). The overall effect for our residents will be to expose them to a further increase in dangerously high levels of NO2 and PM2.5 with all the ensuing health risks. We will never support an LDP that condemns the residents of Warrington to a future guaranteed to drive up long term morbidity

### **Policy DEV4 - Economic Growth and Development -**

WBC's approach to economic growth is not based on any definite growth plan but based on the speculative expansion of logistics businesses

The land allocated is 116 hectares, in strongly performing Green Belt. The proposed need does not warrant removing this land from Green Belt.

The type of jobs proposed will not necessarily be highly skilled or highly paid, attract graduates and be long term.

# Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

The site chosen will not be sustainable and will rely on workers using their own cars

## **Policy DEV 3. Gypsy and Traveller and Travelling Show People Provision**

South Warrington already has the largest number of authorised and non-authorised sites in Warrington with planning permission being both sought and recently granted further pitches. This is on four sites.

What is the evidence that an additional eight pitches should be provided in the Garden Suburb?

The fact that a site is being promoted does not mean it is in the right geographical location.

The majority of unauthorised encampments in Warrington occur in the north of the town – Winwick, Rixton and Woolston, Cucheth, Croft and Glazebury.

These will continue unless there is a greater geographical spread.

What evidence is there that WBC have sought the views of the Gypsy and Traveller Community as to where they would like a pitch or if other locations in the town are viable?

## **DC4. Ecological Network**

Policy DC4 - Ecological Network (1) states that

*The Council will work with partners to protect and where possible secure a net gain for biodiversity across the Plan area. These efforts will be guided by the principles set out in the National Planning Policy*

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

*Framework and those which underpin the strategic approach to the care and management of the Borough's Green Infrastructure in its widest sense contained in Policy DC3."*

Policy DC4 of the LDP states that the only requirement is:

*A site survey carried out by suitably qualified or experienced person to establish the presence, extent and density of these species and identify features of nature and geological conservation importance.*

The Garden Suburb Development Framework states that

*There are approximately 25 areas of deciduous woodland and thickets scattered throughout the WGS area, including ancient woodland. Woodlands range in size from approximately 0.5 – 13 hectares, with some deciduous woodland classed as priority habitat under Natural Environment and Rural Communities Act (2006) Section 41 habitats of principal importance. Several local designated areas (Local Wildlife Sites) can be found along Appleton Edge, these areas are dominated by mature woodlands. The area incorporates Grappenhall Heys Local Wildlife Site that comprises a variety of deciduous and coniferous tree*

Despite this comment, there no evidence in the PSV that WBC has carried out any systematic ecological assessment in South Warrington.

The supporting documentation, **Habitat Regulations Assessment** is the only evidence that any attention has been given to ecology and is



## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

very similar to that used for the 2014 Local Development Plan. Much of the document concentrates on seven SSSI's, some of which are not within the Borough of Warrington, and located in areas to the north and east of the town where there is little development.

Para 177 of the NPPF 2019 states that

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site

The Woodland Trust states that

*Lumb Brook Valley is a delightful site with several distinctive woodland areas including Fords Rough an area of Ancient Semi Natural Woodland, The Dingle with a mix of conifers, broadleaves and a stand of mature beech trees and Julia's Wood which is a young woodland of native broadleaves. There are good displays of bluebells, wild garlic and other wildflowers in the springtime particularly in Fords Rough. The valley has surfaced and well used footpaths linked to the adjacent housing estates and roads.*

Why does WBC not mention The Dingle and Fords Rough in the PSV?

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

There is no content anywhere in the LDP that describes how WBC plan to preserve the ecology of, and benefits from, the 1,715 hectares of Green Belt land Parish of Appleton which will be destroyed in the event that the Plan is adopted.

The landscape value of South Warrington should not be underestimated. It is an undulating attractive landscape of Grade 2 and Grade 3 agricultural land. Residents in other more urbanised parts of Warrington truly value this countryside on their doorstep.

### **Policy GB1 – Green Belt**

Paragraph 136 of the NPPF notes

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt Boundaries having regard to their intended permanence in the long term so they endure beyond the plan period”.*

The Submission Draft draws heavily on Green Belt assessment carried out by Arup. This parcels land up into weak, moderate and strong contributions to the Green Belt.

All areas of Warrington benefit from Green Belt boundaries but the loss of South Warrington's is disproportionate.

There are areas of North and North East Warrington – Burtonwood, Winwick, Croft and Culcheth which could accommodate expansion without conflict with this purpose of the Green Belt.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

Para 134 of the NPPF states that the purposes of the Green Belt include:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;

It is possible to manage growth of these settlements but throughout the Local Plan Viability Assessment although many sites in North and North East Warrington are developable, the majority of these areas are discounted on the basis of a Green Belt appraisal which encourages disproportionate weight to be given to the issue of merger of settlements and a consequent discounting of these areas as potential locations for development.

Apart from Winwick, none of these settlements north of the town have designated heritage value which Green Belt designation might justifiably be designed to protect. This approach contrasts with that in South Warrington, where an abundance of heritage assets are ignored.

By parcelling up sections of land, WBC has not assessed the value of the Green Belt in South Warrington as a whole.

### **Policy DC2 – Historic environment**

Warrington Borough Council's adopted Local Development Plan 2014 stated the Vision in 2027 (p136)

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

*There is a secure long-term Green Belt and the countryside is sustainable and attractive with a thriving rural economy and communities. Farm diversification is supported by a positive approach to development management. Improved access, amenities and visitor attractions area encouraging more people to enjoy the countryside but not at the expense of character, tranquillity ad biodiversity.*

*The continuous protection of the Green Belt has ensured that settlements ... have not encroached into open countryside.*

And on p138

*Support needs to be afforded to maintaining and where possible growing the rural economy particularly through appropriate diversification. Additional pressures on the countryside need to be carefully managed if its character, appearance and the many functions it performs are to be protected and enhanced.*

Fast forward five years to the Proposed Submission Version of the Local Plan 2017-2037 and the Vision – Warrington 2037 (pp 17-18) makes no mention of preserving the Green Belt and states that

*The character of Warrington's places will be maintained and enhanced ...surrounded by attractive countryside and district settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed.*

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

The scale of the development will destroy the historic landscape, remaining agricultural land use, open countryside and semi-rural location forever.

Paragraph 195 of the NPPF 2019 states that

Local Planning authorities should identify and assess the significance of a heritage asset affected by a proposal. Where development would lead to substantial harm to the asset development should be resisted unless substantial public benefit outweighs that harm

The PSV contradicts itself as it states that

*The total amount of development, and the broad locations proposed could mean that there are limited areas that are completely free from built development between each of the proposed new villages and the existing settlements of Grappenhall, Grappenhall Heys and Appleton Thorn. Overall, the potential impacts on landscape could be significant and negative*

*Although the amount of land at each area and the parcels proposed for removal do not make a strong contribution to the green belt, this is still substantial and would adversely affect landscape character and extend the built form. In this regard, a negative effect is predicted*

Parcels of land that are currently performing strongly (as Green Belt) will be surrounded by built development, and so this value will be

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

diminished. Furthermore, the character of existing settlements in Appleton and Stretton are likely to be significantly affected.

The proposed development will have a moderate impact on over twenty heritage assets mostly cottage and farmhouses but also including two churches, two sections of Roman road between Appleton and Stretton lies mainly in their archaeological and historic interest.

Lumb Brook Bridge, a Grade 11 1770 aqua duct carrying the Bridgewater Canal.

*'Allocation of the site may result in the loss of the historic rural setting the bridge/aqueduct is located in. Therefore, development of the site may result in a moderate level of harm to its significance'*

*St Matthew's Church at Stretton is a significant heritage asset and has a strong visual presence in the landscape of the area due to its height and size. The site is situated approximately 70 m away from the Church of St Matthew and is separated by Stretton Road. There are shared views between the site and the heritage asset. The contribution the site makes to the heritage asset is moderate as the rural landscape is a positive attribute in the way the asset is viewed and experienced.*

*Allocation of the site has the potential to cause a moderate impact to the significance of the heritage asset due to the loss of the rural historic setting of the heritage asset*

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

St Cross at Appleton Thorn

*The Church is a significant landmark in the area due to its height and size. The site lies approximately 120 m to the rear of the church. There is soft landscaping which is planted around the boundary of St Cross Church which provides screening of the asset. Due to the distance and soft landscaping to the rear of the heritage site, it is considered that the site overall makes a moderate contribution to the significance of the heritage asset.*

I believe there is more than a moderate impact on the heritage assets of Appleton and Stretton and the mitigation measures proposed will not be sufficient or acceptable.

Para 194 of the NNPF states that

*, or from development within its setting), should require clear and convincing justification Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction*

### **Policy SEV1 - Housing Delivery**

The baseline figure for Warrington based on 2014 household growth figures established a figure line of 792 houses per annum. The Council's adopted fifteen-year 2014 LDP predicted there was sufficient land for housing: 10, 500 dwellings between 2006 and 2027 without need to touch the Green Belt. However just a few years later, the proposed LDP is for a minimum of 19,080 new homes (equating to 945 per year) between 2017 and 2037.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

The methodology for calculating housing need is confusing and contradictory. The plan figure of 945 is based on a speculative and over ambitious (given the current economic climate and the ongoing uncertainty over Brexit) figure from Cheshire and Warrington's Local Enterprise Partnership's Strategic Economic Plan. It seeks to justify this position based on a high level of economic growth stimulating demand for new housing.

The only justification for predicted levels of growth which are central to the proposed the spatial expression of the plan is the development of logistics warehousing at the M6:M56 junction.

There is a complete mismatch between the number of houses proposed and the estimated number of jobs. Moreover, there is no evidence to show that those taking up the jobs in the logistics/warehousing sector will want or are able to purchase property within the Garden Suburb development. South Warrington, especially Appleton has some of the most expensive housing in the Borough. No developer will build more than their requisite 30% affordable quota. The first of the three Homes England developments at Pewterspear Green at Stretton, on the outskirts of Appleton is marketing its cheapest property at c£230,000.

There will have to be radical changes on the rules for affordability so they are based on a percentage of income rather than an arbitrary proportion of market price otherwise we risk all future house building in South Warrington continuing to be only affordable to



## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

those with a high disposable income and ability to fund a large mortgage.

Building of new housing in south Warrington will not be able to deliver the scale of affordable housing which would change this unsustainable pattern of development.

South Warrington could very easily continue to be a dormitory suburb for Liverpool, Manchester, Chester and beyond.

Warrington's history of housing delivery is poor, and there is doubt that the Plan will not be able to deliver. There are phasing requirements that could delay housing delivery and are reliant on substantial improvements to infrastructure. Moreover, with nine proposed build sites over a twenty year period - including the three sites (c1000 houses) which will already be in development, the whole of South Warrington will be a permanent building site.

### **The PSV is not sound because there is**

- Lack of clarity on housing need and housing numbers
- No guarantees that the houses will be of the type and value required by the housing market

### **Policy INF5 - Infrastructure Delivery**

The National Planning Policy Framework (NPPF, 2019) clearly sets out at Paragraph 8 that the delivery of infrastructure is key to the creation of sustainable communities. Paragraph 20 requires that

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

delivery of infrastructure is key to the identification of strategic policies within a local plan

Warrington Borough Council's Infrastructure Delivery Plan states that

'For the Garden Suburb, the Council is proposing to facilitate the forward funding of key infrastructure requirements. For the purposes of the Local Plan Viability Assessment, the Strategic infrastructure cost for residential development has been set at £18,500 per dwelling in the first year of the development. This figure has been assessed using current estimates for the delivery of infrastructure in accordance with the Infrastructure Delivery Plan, assumed S106 contributions and the cost of advanced funding. Against this the Council has set an external public sector funding requirement. It should be noted that the funding to meet this requirement has not been confirmed at this stage. The financing to support this enabling infrastructure is the subject of ongoing discussions.

The example of primary health provision is just one example of .....

The Infrastructure Delivery Plan states there is to be a new health facility. The cost is TBC.

Warrington Estates Strategic Plan 2015-2020 published by Warrington Clinical Commissioning Group on behalf of its partners including Warrington Borough Council, NHS England, Warrington and Halton Hospitals NHS Trust provides information on primary health care provision in Warrington.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

<https://www.warringtonccg.nhs.uk/Policies%20and%20Strategies%20including%20plans/Warrington%20Strategic%20Estates%20Plan%20-%2008.03.16%20Final.pdf>

Information from the NHS Workforce Survey has been used to obtain average GP list sizes for England and for Warrington as a whole, and provide an indication of the increased likely need for GP services resulting from these potential developments.

Warrington, both overall and at GP cluster level, has substantially fewer GPs per head of population than England. Warrington would need an extra 26 WTE GPs to have comparable list size to the average.

### South Cluster

The majority (82%) of patients registered with South Practices live in South Neighbourhood Co-ordination Area (NCA

Most of South Cluster patients live in Lymm (27%), Appleton (18%), Grappenhall & Thelwall (15%), Stockton Heath (11%) and Latchford East (9%). Approximately 7% of South Cluster patients live outside Warrington (mainly in Cheshire East and Cheshire West & Chester local authorities).

The capacity analysis shows that the practices within the South cluster collectively have a surplus of two but in 2030 the practices are likely to be in a deficit of three rooms.

The planned HCA sites in the South will comprise of over 1,000 units and considerations will need to be made as to how the capacity deficit will be addressed

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

<b>South Cluster Analysis</b>	<b>Current</b>	<b>2030</b>
List Size	48,715	53,347
Estimated annual activity	292,290	320,082
Number of clinic rooms required	44	49
Surplus/Deficit clinic rooms	2 surplus rooms	In deficit by 3 rooms

The planned HCA sites in the South will comprise of over 1,000 units and considerations will need to be made as to how the capacity deficit will be addressed

This has been addressed as the planning application for the Appleton Cross site includes provision for a new health facility and has been costed at £1m with £789, 504 confirmed and with a shortfall of £210, 496 with the provider yet to be confirmed.

However for the Garden Suburb, the Infrastructure Delivery Plan states that there is to be an (additional) new health facility. Cost TBC.

- How can this be a sound and plan when funding is not confirmed and financing is the subject of ongoing discussions?
- The Clinical Commissioning Group stipulates that there has to be a critical mass of patients for a new GP facility to be built.

# Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

- How can both a new health facility at Appleton Cross and in the Garden Suburb be delivered.

Warrington's record on infrastructure primary health care provision associated with new development has been unsuccessful. The leading example is the proposed Chapelford Health Centre. A proposed new health facility was in the 1997 Masterplan.

Warrington Estates Strategic Plan 2015-2020 states

## **Chapelford Primary Care Development**

Potential development size: 560m<sup>2</sup>

Nearest GP: Chapelford Health Centre, Burtonwood Road and Hood Manor, Great Sankey

The provision of primary care in the Chapelford area is already under intense pressure. It has seen an expansion of local housing at a fast pace and the creation of a new urban village which has resulted in many of the surrounding practices becoming full.

Primary Care Services have been provided in Chapelford from temporary porta-cabin premises for more than 13 years which is of inadequate size for the needs of the surgery and their patients. The premises do not comply with current health and safety or Disability Discrimination Act requirements and there are problems with privacy and confidentiality in the building. It is not possible to extend the premises on the current site and no land is available adjacent. There is no scope for improvement by internal redesigns.

The preferred option is to develop a new primary care building with pharmacy, within the new urban village to enable the delivery of primary medical care services to a registered population up to 6,000

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

patients by a multidisciplinary team of primary care clinicians and managers.

It is now mid-2020 and there is still no new GP surgery in Chapelford so how can there be any confidence that new health facilities will be built to serve this scale of development in South Warrington.

### **Policy DEV 2 - Housing need**

The baseline figure for Warrington based on 2014 household growth figures established a figure line of 792 houses per annum.

The Council's adopted fifteen year 2014 Local Plan predicted there was sufficient land for housing: 10, 500 dwellings between 2006 and 2027 without need to touch the Green Belt.

However just a few years later, the proposed LDP is for a minimum of 19,080 new homes (equating to 945 per year) between 2017 and 2037.

Appleton Parish Council along with other South Warrington Parish Councils finds the methodology for calculating housing need confusing and contradictory.

Appleton Parish Council believes that plan figure of 945 is based on a speculative and over ambitious (given the current economic climate and the ongoing uncertainty over Brexit) figure from Cheshire & Warrington's Local Enterprise Partnership's Strategic Economic Plan.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

It seeks to justify this position on the basis of a high level of economic growth stimulating demand for new housing

We find the only justification for predicted levels of growth which are central to the proposed the spatial expression of the plan is the development of logistics warehousing at the M6:M56 junction.

There is a complete mismatch between the number of houses proposed and the estimated number of jobs. Moreover there is no evidence to show that those taking up the jobs in the logistics/warehousing sector will want or are able to purchase property within the Garden Suburb development.

South Warrington, especially Appleton has some of the most expensive housing in the Borough. No developer will build more than their requisite 30% affordable quota.

The first of the three Homes England developments at Pewterspear Green at Stretton, on the outskirts of Appleton is marketing its cheapest property at c£230,000.

While we welcome the mix of housing types proposed for South Warrington, there will have to be radical changes on the rules for affordability so they are based on a percentage of income rather than an arbitrary proportion of market price otherwise we risk all future housebuilding in South Warrington continuing to be only affordable to those with a high disposable income and ability to fund a large mortgage.

Building of new housing in south Warrington will not be able to deliver the scale or affordability of housing which would change this unsustainable pattern of development.

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

Warrington's history of housing delivery is poor and we believe the Plan will not be able to deliver.

There are phasing requirements that could delay housing delivery and are reliant on substantial improvements to infrastructure

Moreover with nine proposed build sites over a twenty year period - including the three sites (c1000 houses) which will already be in development) operation, the whole of South Warrington will be a permanent building site.

### **Port Warrington**

The Port Warrington expansion plans is based on the construction of the Western Link. This allows for a new feeder road to run between what is currently Moore Nature Reserve and the A56. Whilst the reason for the new crossing is ostensibly to provide congestion relief for Bridgefoot, the main driver is Peel Ports, since their grand plan for PW Phase 2 rests almost entirely on the ability of WBC to deliver a suitable HGV access route.

There is room for up to 3 million square feet of warehousing on the 200 acre Nature Reserve site. This would require a large number of HGV movements to service it - every 1 million square feet generates a minimum of 350 HGV movements per day. With it comes a massive increase in particulate pollution, some from emissions and a large quantity from road surface and tyre wear, known as the Oslo Effect. All this extra HGV traffic is to be routed south over the new



## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

bridge, thus bringing the added pollution to Walton and Stockton Heath residents.

The success of the Peel Ports venture will result in a large increase the commercial traffic along the Manchester Ship Canal and a large number of container ships berthing at Port Warrington would need to be substantial. This leads to air quality implications. When in port, this type of ship burns on average 1500 gallons of fuel oil per day, which equates to nearly 65 gallons per hour. This type of fuel, be it Marine Gas Oil (MGO) or Heavy Fuel Oil (HFO) produces very large amounts of SO<sub>2</sub> and NO<sub>X</sub> when burned. The average figures are as follows:

NO<sub>X</sub> - 900g/hr

SO<sub>2</sub> - 300g/hr

PM<sub>10</sub> / PM<sub>2.5</sub> - 100g/hr

These are the emissions from the auxiliary engines which provide electrical power.

North Warrington (Labour)		South Warrington (LD/Conservative)	
Area	No of houses	Area	No of houses
Burtonwood	160	Lymm	530
Croft	75	South West Ext.	1600
Culcheth	200	South East (Garden Suburb)	7400
Hollins Green	90	Already approved with some under construction	945
Peel Hall	1200		
Winwick	130		
<b>Total</b>	<b>1855</b>	<b>Total</b>	<b>10, 475</b>

Peel Hall has already been the subject of a Planning Inquiry for development and is a green field not Green Belt site

## Response to Warrington Borough Council's Proposed Submission Version of the Local Plan 2017-2037

Judith Wheeler, Borough Councillor for Appleton, Stretton and Higher Walton, 16<sup>th</sup> June 2019

Even the development scheduled for Burtonwood had been significantly scaled back to 160 homes, as it was felt the impact on the community was too great. This is the ward held by the former Council Leader and now a new Deputy Council Leader. There is no comparison in terms of scale to the losses that South Warrington will face: 10, 475 homes in total if we include the 945 already in the system at Appleton Cross, Pewterspear and Grappenhall Heys. It is hard to conclude anything other than the adoption of the LDP by Warrington Councillors was politically motivated. Councillors in the North of the Borough – all Labour - voted either for the LDP or abstained. Their own wards will be little affected by small and contained amount of development.

- .
- .
- .