

June 4th 2019

Local Plan

Planning Policy & Programmes

Warrington Borough Council

New Town Home

Warrington, WA1 2NH.

Dear Sirs,

Objection to the Local Plan.

As a resident in Warrington & Lymm for over 70 years of my life I wish to object to the proposed Local Plan, prepared by Warrington BC.

My submission reiterates the information prepared by the South Warrington Parish Council's local Plan Working group, with which I agree, and would ask you to take into account in considering the proposed Local Plan.

GREENBELT

■ The loss of 600 acres of Green Belt is not properly justified

- the only winners are the developers. The Green Belt boundary was only confirmed 5 years ago in a plan that was supposed to be good for 20 years

■ The Plan reduces Warrington's Green Belt by 11% and almost all the land targeted is in South Warrington

■ The plan for the Green Belt release hits **Appleton, Grappenhall, Stretton, Walton and Moore** very hard.

Shouldn't any release required be spread more evenly across Warrington?

■ The Council should look more carefully at brownfield sites in the town rather than the easy option of using Green Belt land

■ The environmental and ecological impact of the loss of Green Belt has not been properly assessed

■ The proposed Garden Suburb in Grappenhall will result in a huge loss of Green Belt. 4200 dwellings would be on Green Belt and there would also be giant warehousing facilities

HOUSING

■ Around 5000 new homes in total would be built, up to 2037, in the 'Garden Suburb' to the south east of the Borough with the potential for 2300 more homes beyond this date

■ An urban extension to the south west would provide a further 1600 homes at Walton which would triple in size and remove part of Moore Nature Reserve

■ Most of the new housing will not be affordable for local people. Developers would only be required to build a maximum of 30% affordable homes which is not enough

■ Workers at the warehouses and distribution centres will probably have to commute from outside the area

■ New homes in the south would be too far from both our railway stations, meaning more car use across town

INFRASTRUCTURE

■ There is no new route into town from the South East and the Plan still relies on three Victorian swing bridges

■ The Infrastructure Delivery Plan is dependent on already overstretched roads and bridges

■ There is no confidence that the infrastructure needed can or will be delivered either in the main settlements or the smaller outlying ones like Lymm

CONGESTION & AIR POLLUTION

■ The development proposed does nothing to ease existing problems of traffic congestion and air quality and can only make things worse, especially in Stockton Heath and Lower Walton

TOWN CENTRE

■ The proposals are not enough to trigger regeneration in the town centre. They would just carry on the same pattern of commuting into Manchester and Liverpool for work, shopping and leisure

A PLAN FIT FOR PURPOSE?

- We doubt the Plan is deliverable
- The housing numbers which drive the whole Plan are unrealistic relative to what Warrington has achieved in the past
- Instead of pressing ahead with these numbers, there needs to be some challenge to them from Warrington Council about what is practically achievable
- There also needs to be serious liaison with neighbouring local authorities
- Details of the plans for roads are very vague. The only firm proposal is for a new wide dual carriageway strategic road running parallel to the M56 linking Barley Castle industrial estate to Junction 10. This is likely to become a racetrack for lorries doing nothing to support the proposed new housing
- Specifically there is nothing planned to improve the A49 as it goes north from the M56
- There is no definitive proposal for how the residents of South Warrington will get into town, either by building a new road or by using more creative solutions
- There is no detail of how the Plan will actually result in regeneration in the Town Centre or preserve the identity and distinctive character of our area, both of which are Warrington Council policy objectives
- The Plan does not clearly show what the 'very special circumstances' are for development in the Green Belt.
- The most likely outcome is that many houses will be built on Green Belt but the supporting infrastructure will not be delivered
- We risk our Green Belt being sacrificed for the sake of an over-ambitious Plan
- The integrity of all our villages would be threatened

ECONOMIC GROWTH

- The Council is being too ambitious. Growth predictions are based on unrealistic levels of activity and development at rates which have never been achieved before
- There seems to be no understanding of how development in Warrington should take account of what is happening in Greater Manchester and Merseyside
- Growth seems to be driven by new housing creating economic benefit, instead of the other way round

In addition I attach a copy of the Comments from
Lynn Parish Council. This shows the extent of
opposition to the proposed Plan and I suggest merits
your review consideration.

The local plan proposed goes against the
Government position that Green Belt should only be
used when it can be shown there is no
alternative.

I trust my views will be taken into account.

Yours Faithfully



WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN
2017 to 2037 – Comments 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
- 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

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
- 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?

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
- 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
- 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 wishlist of worthy ideas

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 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

Deiverability

- We have already challenged the ability for the housing targets to be met
- 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, 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
- 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 Highways Department over traffic safety issues
- There is an over reliance on recorded statistics at the expense of common sense and local knowledge
- 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!

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?

21 May 2019
Version 2