

# PROTECT OUR GREENBELT AND SAVE OUR VILLAGE

Name

Ann Plumpton

Address

[REDACTED]

Address to:-

**Planning Officer, Local Plan, Planning, Policy and Programmes, Warrington Borough Council, New Town House, Buttermarket Street, Warrington, WA1 2NH**

The following statements are just a "short version" of my objections and concerns and more evidence can be found in the Burtonwood and Collins Green Action Group's file.

You cannot fail to see the open countryside and the Beauty all around you in Burtonwood and Collins Green. Feel the benefit of the fresh air and appreciate the value of a slow paced village life and tight community. All of that is under threat from a proposed development set to go ahead in 2020. Further developments are being proposed that could see our beautiful rural village evolve into an urban town. Below are some objections to the plan.

## **(1) CONSULTATION**

The proposals for the development are vague and unclear. Many residents didn't get letters and those that did were not addressed by name. The venue for the consultation was not accessible to all and the means to complain long winded and complicated. Communication and information is lacking and appears to be mainly online based, not everyone is online. Developers and planners have access to consultants and resources, we don't. It is a highly unequal and undemocratic process. The council have a duty of care to liaise with neighbouring authorities to determine overall effects of congestion and road safety. There is little evidence of this having happened.

## **(2) INFRASTRUCTURE**

Both hard infrastructure roads, bridges, railways etc and soft infrastructure- health, doctors, dentists, social services, education, parks and recreational facilities, law enforcement, emergency services and mental health will be affected by this and further proposed developments. Burtonwood and Collins Green do not have the infrastructure to support this development. Northern trust have said that if only 150 houses are approved the figure will be 'too limited to viably deliver the housing, open space, and, specific support for expansion of primary school facilities and primary care' In other words, no contribution to changing infrastructure unless more houses are approved. Which means longer waits for doctors, dentists, community nurse, counselling etc. School places in catchment areas no longer guaranteed.

## **(3) GREENBELT OVER BROWNFIELDS**

The release of greenbelt has not been adequately justified and the reasoning for not using brownfields is unacceptable. The council should be forcing development on brownfields or previously developed land before any greenbelt is released. The plan involves loss of versatile agricultural land which leads to loss of income for tenant farmers. The plan relies too heavily on representations and assurances from land owners and developers.

## **(4) ENVIRONMENTAL—TRAFFIC— AIR POLLUTION**

There appears to have been no assessment of traffic movement on Green Lane-Phipps Lane over a sustained period of time. The proposed entrance to the new development will be on Green Lane. Green lane is already critical for residents, children and parents on their way too and from school. With 160 houses comes approx. 320 more cars on the road at peak times. Couple this with other local developments and this is a recipe for



gridlock on our roads. Our children will be walking and cycling amongst this traffic which is not only physically dangerous but also has serious health connotations.

Warrington has one of the most congested road networks in the country. Air pollution in Warrington is already amongst the worst in the UK. The proposed access point to the new development is on green Lane opposite Burtonwood County Primary School. The increase in traffic on the lane will be immense. The pollutants in the air around our children and entering their lungs will massively increase. Children are more susceptible to pollutants than adults and exposure could cause or exacerbate ailments such as asthma and COPD. Adults are more susceptible to heart and lung disease and respiratory conditions such as emphysema.

**(5) LOSS OF WILDLIFE HABITATS**

Drastic loss of wildlife habitat (frogs, newts, toads, bats, woodpeckers, sparrows, starlings blue tits, foxes, rabbits and hares etc) is being treated like it doesn't matter. Britain has already lost half its wildlife, wildlife adds value and natural beauty to our environment and provides respite from everyday stresses. This development will decimate the local wildlife we love to watch.

I object to the proposed development plan on points All of them!

Additional Comments

I agree to the above statements and reflect my views and those as coordinated at our local meetings that formulate our objections as to the proposed building plan.

Signed \_\_\_\_\_  
Date \_\_\_\_\_  
Telep \_\_\_\_\_

Letters of objection need to be with the Planning Officer before 5:00 pm on Monday 17<sup>th</sup> June 2019.



# Proposed use of green belt land in Buxtonwood. WA5.

Name Ann Plumpton

Email [REDACTED]

Address [REDACTED]

## Representation to the draft Local Plan

### Vision: too much emphasis on growth

The Responding to Representations Report Regulation 18 (2019): the overwhelming majority of responses from residents, community groups and Parish Councils expressed objection to the Plan's vision promoting Warrington's transformation from a New Town to a 'New City'. In reply, the Council maintains that this was never a bid to formally change the town's status but a concept to help explain how it was seeking to promote Warrington's future growth. While specific references to Warrington New City have been removed from the draft Local Plan, the overwhelming emphasis remains on growth. After the consultation, in November 2017, an executive director (in an address to the TPA) continued to outline a "leap in growth" towards a "city of the future".

A large number of representations pointed to lack of community involvement in defining the vision and objectives. There was significant objection to the scale of the PDO's development aspirations and the resulting need to release Green Belt land. The Council states that it has taken these into account in preparing the new Local Plan. Nevertheless, large-scale economic growth remains the basic, untested underlying assumption. The objectives have been updated to reflect "the higher level of development", given ongoing development pressure. Hence, the headline figures: 18,900 homes by 2037, 362 hectares of employment land, removal of 11% of Green Belt land.

The emphasis on growth cannot be taken as given in the current climate. It is not a vision that has been developed with the support of the local community. An over ambitious vision imposed from above undermines the NPPF aim of including people and communities at all stages of the planning process.

### Developers versus residents

There was also a clear division between Regulation 18 Representations from a large number of developers and landowners arguing for more growth, and actively promoting sites, compared to residents and some local representatives arguing for a more cautious, communitarian and environmentalist approach. This leads to gross inequalities in expertise and resources when it comes to relatively technical issues, to the disadvantage of the lay person. Few people have the expertise or the resources to challenge the outcome of the Council's "comprehensive review of its housing and employment needs evidence base, using updated forecast and projection data". Nevertheless there is a widespread belief that the need for new homes and employment land is exaggerated and rests on unsound evidence. In this unequal struggle, some communities are unable to secure the help and support of their local councillors which would go some way towards redressing the balance; others have suggested crowd-funding as a way of making representations that count.

### The Green Belt

As recently as 2014 it was agreed that there was no need to release Green Belt land. This was in line with one of the 5 purposes of Green Belt policy: to assist in urban regeneration, by encouraging the

recycling of derelict and other urban land. WBC now claims that it needs to release around 11% of its total area of Green Belt. It claims that, in line with NPPF (2019), it has considered other reasonable options for meeting its identified need for development (para 5.1.9).

There are no 'exceptional circumstances' to justify a review of the present Green Belt. If the case for housing and employment growth falls, and if there is evidence to show that full use is not being made of previously developed land, the case for the release of Green Belt falls.

Nevertheless, WBC embarked on a review of its Green Belt, based on assessments made by consultants in 2016. The ARUP report's methodological approach has been the subject of widespread criticism: it is subjective, pseudoscientific and flawed. It claims to apply 'professional judgement in line with the methodology' to assess parcels of land that make a strong, moderate or weak contribution to the purposes of the Green Belt. In other words, it aims to show that some parts of the Green Belt are more important than others. While the findings do not in themselves result in changes to Green Belt boundaries, they do feed into the overall assessment of development options as part of the Local Plan.

### **Burtonwood and surrounding Green Belt**

The Council's site assessment conclusions are based on unsound evidence and a mistaken attempt to classify Green Belt land.

ARUP's final report surveyed 9 parcels of land forming a collar around the village. It concluded that 8 made a strong contribution to the Green Belt; one (BW3 bounded by Green Lane, Phipps Lane and Lumber Lane, and put forward in part for development in the Local Plan) made only a moderate contribution. While this parcel is judged to make a strong contribution in assisting in safeguarding the countryside from encroachment, it is argued that any development would be contained by durable boundaries (Green Lane and Lumber Lane). In other words, development could take place from Phipps Lane to Lumber Lane because this parcel is not a fundamentally important part of the Green Belt.

As the developer, Northern Trust, puts it: "As the only 'moderate' parcel surrounding Burtonwood the evidence base clearly identifies Parcel BW3...as appropriate for consideration for development and release from Green Belt to meet identified housing needs". Or, as the draft Local Plan states. "the site only makes a moderate contribution to the objectives of the Green Belt" (10.5.3).

ARUP's Addendum (2017), following Regulation 18 Consultation, has since downgraded another parcel of land (BW2, land to the west of Phipps Lane) from making a strong contribution to the Green Belt to a moderate one (Appendix C). While developers will certainly be aware of this change, local residents may not be.

### **The Case for 160 houses in Burtonwood**

The rationale for 160 dwellings is unclear and imprecise. It has been suggested that an upper limit of 10% of existing housing should be used in 7 'outlying settlements', although this has not been applied across the board. The figure is an arbitrary, mathematical limit with no foundation in planning practice. It is no substitute for the proper examination of a settlement's character or analysis of its infrastructure.

The Site Assessment Technical Report (2019) notes that developers have put forward proposals for 260 dwellings. It adds, "this would be too large. It is therefore recommended that half the site is taken forward".



According to the developer, the proposal for 130/150/160 dwellings is not viable. They argue that a viable scale of expansion will be in the region of 250-300 homes. This contradicts the Council's claim that the development is achievable.

Residents are right to be sceptical of the claim that the proposal for (a minimum of) 160 dwellings on part of site ref: 1654 is the end of the matter. A number of adjacent sites now sit on land which has been judged as making only a moderate contribution to the Green belt. The settlement proformas also show that, while each site cannot be developed on its own, they can be brought forward in conjunction with site ref:1654. At the moment, the draft plan acknowledges that such developments would be beyond the housing requirement for Burtonwood. Given all the other unknowns in the Plan, it is not impossible that the situation will change when the plan is reviewed at 5 yearly intervals.

### **Duty to Cooperate**

There is little evidence of positive outcomes arising from the duty to cooperate with neighbouring local authorities. St Helens and its immediate neighbours have recently undertaken or are in the process of undertaking their own Green Belt reviews to meet *their* development needs (St Helens Local Plan draft 2020-2035). This means large housing developments next to the outlying settlements of Burtonwood and Collins Green, along Gorsey Lane and in the Key Settlement of Earlestown. There is no evidence of cooperation in terms of housing market needs across authority boundaries or infrastructure provision in terms of roads, traffic management, school places, health facilities etc.

In line with an alleged sub- regional need for large scale logistic and warehousing development, St Helens expects a strong shift to B8 uses, *providing the potential to increase its economic competitiveness (2.4.1)*. Both Warrington and St Helens cite proximity to major road and motorway networks as a reason for pressing ahead with B8 land uses, even though this will prove counterproductive as roads reach their capacity.

Cooperation with St Helens Borough Council for the development of a 31 hectare extension to Omega to meet Warrington's employment needs is still in a pre-planning stage. The proposal is constrained by the need to ensure that the site can be satisfactorily accessed. This fails to meet the NPPF (para.173) requirement that plans should be deliverable and up to date.



**Subject:**  
**Date:**

Re: Local Plan & Proposed Development of Green Belt Land in Burtonwood (Phipps Lane)  
17 June 2019 14:13:15

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Good afternoon

Some of the key information provided by WBC about the proposed development of 160 houses in Burtonwood is wrong. The mistake is due to confusion over the difference between a site and a field. Residents have been told on numerous occasions that, "one site is being suggested by the council, that is the field at the junction of Green Land and Phipps Lane. The council say that the field is **too big** for 160 homes and so **only half of it** would be needed (emphasis in the original). The other half would stay in the green belt." (Letter from Councillors Mitchell and O'Neill to residents, 11<sup>th</sup> June 2019).

Site 1654 is comprised of two fields, as can clearly be seen in the Settlement Proformas/Site Selection, 27<sup>th</sup> November 2018. The site runs from Phipps Lane to Lumber Lane. The site was considered to be too large. It was therefore recommended that half of the site is taken forward. In other words, **one whole field**.

This misinformation has been repeated over and over again by council representatives in spite of residents' attempts to have it corrected. The confusion between a site and a field is repeated in the information posters on policy OS1 Burtonwood as displayed at the consultation events at Halliwell Jones Stadium.

We are therefore demanding an extension to the consultation process so that the residents of Burtonwood can form judgements based on correct and not misleading information.

You are no doubt aware that Fiddlers Ferry Power Station is situated in Warrington, the address being, Widnes Road, Warrington WA5 2UT. This Power Station will be completely closed by 31st March 2020.

This site was not considered for inclusion in the Local Plan. It should now be included and the Local Plan revisited.

The site is Brownfield and is a huge site which could easily be developed thus fulfilling your requirement to build more houses in Warrington.

Burtonwood Parish Cllr. Cathy Mitchell stated (at a recent surgery at Burtonwood) that Warrington Borough Council wanted to develop a large site rather than the infill of pockets of Brownfield land.

Now is Warrington Borough Council's opportunity to fulfill it's obligation to the Government to build more houses and for Warrington Borough Council to LEAVE GREEN BELT LAND ALONE. As stated by the Government "Green Belt Land should only be used as a last resort and only in exceptional circumstances".

yours faithfully  
Ann Plumpton

