

From: [REDACTED]
To: [Local Plan](#)
Subject: Proposed Submission Version Local Plan (2017-2037)
Date: 14 June 2019 13:00:53

Dear Sir/Madam

My details:

Name: George Anthony MARSDEN
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Status: A local resident living in Warrington
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I am writing to object to the Proposed Submission Version Local Plan (*Local Plan*) document submitted by Warrington Borough Council (WBC), which aims to meet (in their opinion) the needs for housing and employment from 2017 through to 2037. The Local Plan aims to deliver 18,900 new homes (approx 945 per year) and provide 362 hectares of employment land.

The following are section numbers from the WBC Local Plan, together with my observations / objections as I do not believe that the plan is "sound" nor do I believe it is "deliverable".

1.1.8

In my opinion:-

- Building targets of 945 houses per annum are unrealistic given that the highest building rate by WBC is approximately 550 per annum
- Plans are very vague in respect of additional roads or upgrades to roads that are required to support the proposed developments
- The economic growth prediction figures used have come from the Local Enterprise Partnership (LEP) without any specific details to back up such predictions
- Official figures predict much slower growth than that detailed in the plan and hence there is no Justification to use such forecasts in predicting Warrington's housing need.
- The planned number of homes is well beyond government housing targets.
- The employment land is not backed by any meaningful economic strategy for the town

3.2 (W2)

The Green Belt boundary was only confirmed about 5 years ago and was meant to last for 20 years, and yet WBC are already wanting to change the boundaries to meet their plans for new homes and employment sites. This is not acceptable.

3.2 (W4)

The proposed Local Plan (Figure 3 - Local Plan key diagram) is very vague in respect of improved routes into central Warrington. Increased housing in the Garden Suburb (5,100 by 2037) within that plan will result in a significant increase in road traffic. There are not any clear plans from WBC to accommodate the additional journeys into / through Warrington, where the town centre and crossings over the Mersey and Manchester Ship Canal are already very congested.

3.2 (W6)

Releasing Green Belt for housing and employment land is an adverse impact on the environment. Building a further 18,900 homes and large logistics developments such as the "six/56" will result in a significant increase in both domestic and HGV traffic which will adversely affect the air quality. There is nothing in the Local Plan that informs us as to how this can be negated. Warrington already has one of the highest air pollution rates in the UK. This development will make it even worse.

3.3.10.

The existing countryside which is planned to become the Garden Suburb, already has pathways, cycle ways, bridle ways and country lanes. To say that "New greenways" will be created is being disingenuous at best. They will not be "new", they will be elements of what is left after WBC have paved over existing Green Belt. WBC do not state in their plan, exactly what will constitute "improved access to the Town Centre" as there are not any plans for new roads into town or new crossings over our waterways.

3.3.15

The Green Belt boundary was only confirmed about 5 years ago and was meant to last for 20 years, and yet WBC are already wanting to change the boundaries to meet their plans for new homes and employment sites. This is not acceptable.

3.3.18

There are a great number of town centre buildings that are currently empty and should be considered for redevelopment for appropriate "office space" if there is a demand for such.

3.3.21

Port Warrington: This will be operated by Peel Holdings / Peel Ports. I am totally against any further interaction that WBC have with Manchester Ship Canal (MSC) owners, Peel Holdings. Peel have totally failed to be open and transparent about many dealings with WBC and have failed to maintain the existing Victorian swing bridges on the MSC. Peel is a privately owned company and it seems that they are unwilling to perform the required maintenance, resulting in the bridges failing to close properly on many occasions recently, after having opened for canal traffic. The result has been chaos on the main artery roads across the various bridges. The bridges are now very rusty and not at all a good advert for the local villages. Peel are also owners of the Bridgewater Canal and the many historic (listed) hump-back bridges are in need of repair, which Peel again are failing in such duty. WBC should not conduct further business with this company until they honour their obligations in owning/operating these two canals.

Port Warrington will require land from the Moore Nature Reserve. So on the one hand WBC want to preserve our local countryside and amenities and then they plan to build across a nature reserve which cannot just be replicated elsewhere. Unbelievable!

Garden Suburb Employment Area: This is the proposed huge "six/56" industrial (logistics / warehousing) development set to be built on 116 hectares of existing Green Belt land. There is not any justification for releasing Green Belt for this development. In addition, the resulting increase in HGV journeys from such a development will be extremely detrimental to air quality, congestion and noise pollution. The existing commercial businesses at the Barley Castle industrial estate already results in congestion along the local roads that provide access to the M6/M56 junction. The M6 is currently one of the worst motorways in the country for traffic delays and road closures. It is now set to have the second highest number of road works (M1 will be highest) in the next couple of years which will cause further extensive delays and closures or carriageways. The employment needs at "six/56" are unlikely to be high paying roles and so it is not realistic to state that it will benefit from the Garden Suburb neighbourhood which will have many higher value properties. This will likely result in employees coming from outside the area i.e. even more road journeys.

3.3.28

The southern end of this road is from Chester Road, near to the junction with Gainsborough Road. This link is likely to increase traffic journeys but the traffic still has to cross over the old Victorian swing-bridge that spans the Manchester Ship Canal. As mentioned above, Peel have spectacularly failed to maintain these bridges, thus causing unnecessary delays when the bridges get stuck. If Peel are hoping to increase traffic along the MSC, then there will be an increase in bridge openings causing more delays for the increased traffic trying to get to the Western Link road.

3.3.29

I understand that this road will be a dual carriageway which is therefore likely to be used by HGV traffic cutting across from the M56 junction at Stretton to get to the six/56 development, so avoiding the chaos at the M6/M56 junction. This will result in increased air pollution for the residents living in the proposed Garden Suburb.

3.4.1 - 3.4.16 (various paragraphs)

The Local Plan, in seeking to release Green Belt for development, breaches the following 4 criteria for Green Belt.....

- to check the unrestricted sprawl of large built-up areas
- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Only "to prevent neighbouring towns merging into one another" is not impacted by the Local Plan.

The Garden Suburb in particular will indeed result in urban sprawl. It is also encroaching into the countryside. It will severely impact the existing villages of Stretton, Appleton Thorn, and Grappenhall. WBC have not satisfactorily proved that there is indeed the need for the high level of housing and employment acreage that is in the Local Plan, and they just prove such need to justify this development.

4.1.6 - 4.1.30

In response to questions sent to a Government Minister concerning the targets set by WBC for future housing, his reply was that the government guidance was not a "target" but was for guidance only, and local councils should create their own targets based upon realistic needs. WBC have not proved that their housing targets are indeed realistic needs and so I would like to see justification for such high targets.

Brownfield sites should be developed first in line with growth projections by WBC and only then should they look to ascertain if Green Belt should be released based upon actual demand for space. Instead, the Local Plan appears to be looking for release of Green Belt land first which is against the criteria for Green Belt.

Future redevelopment of the Town Centre should contain provision for residential accommodation in all new buildings.

There are plenty of existing properties within the town that can be refurbished to make apartments, especially above retail premises. This would not only resolve part of the housing problem but also result in having a more vibrant town centre. Why

have WBC not included such schemes in the Local Plan?

4.1.68 - 4.1.71

The illustrative plan (Policy MD2) showing the Garden Suburb does not identify the proposed location of a Travellers/Gypsy facility, even though it is mentioned under *section 10. Policy MD2.1*. Quite understandably, whether WBC like it or not, there is a general concern about where such a facility may be located. Residents in general are averse to owning a home in close proximity to such sites due to stories about anti-social behaviour from Travellers. I fully understand that there are governmental edicts about Councils needing to provide facilities for Travellers and I am fully aware that we need to be sensitive about discriminating against travellers. But I do think it is essential that WBC clearly indicate on the plans, the proposed site of any such facility.

4.2.4 - Policy DEV4 / 4.2.19

Port Warrington (74.36 ha) - Policy MD1 - Warrington Waterfront

A proportion of this development will be on the existing Moore Nature Reserve. Once gone it cannot be replaced.

Warrington has so little in the way of such habitats that I am against any actions that will destroy wildlife habitats such as this. The overall development in this area will result in many more HGV journeys across areas of Warrington, adding to the already poor air quality in the area as well as noise pollution. Peel, who will be the operators of the Port are notoriously private and play by their own rules. Already they use delaying tactics to avoid repainting / maintaining the Victorian swing-bridges across the MSC. I am concerned as to how the relationship between Peel and WBC will operate.

Garden Suburb (116 ha) - "Six/56"

WBC identified a "need" for additional logistics/warehousing businesses in close proximity to major road networks. This enormous Green Belt site is currently used for agriculture. I am totally against this development. Once the Green Belt is surrendered for such a project it can never return. The junction of the M6 and M56 motorways together with the A50 road from Warrington to Knutsford, is already subject to horrendous congestion every week. There are regular queues of southbound traffic on the A50 approach to the junction and also along the B5356 from the existing Barley Castle business park. The latter traffic consists largely of HGVs. The M6 motorway is often closed in both directions due to accidents, breakdowns, etc. particularly over the Thelwall Viaduct, causing tailbacks along the local road network. This area already has one of the top air pollution readings in the UK and WBC want to develop a huge industrial site that will result in thousands more HGV journeys which will negatively impact the already poor air quality. They have not provided details of any new / updated crossings over the MSC and the River Mersey, so when congestion occurs (and it will) the traffic will take the existing routes via Warrington, causing untold misery to residents and commuters. WBC need to show justification for such a massive development, and not just respond to the wishes of developers.

I do not believe that WBC have satisfactorily proved the "very special circumstances" that warrant release of Green Belt for the above two development and would like to see such justification.

5.1.9 - 5.1.10

I disagree that the WBC have proven the "very special circumstances" to release Green Belt land for housing and employment areas. The Local Plan is flawed in that the housing figures are higher than official figures and the assessment of employment areas are too ambitious. Growth predictions are based upon unrealistic levels of activity and at rates which Warrington have never achieved previously. WBC have only reset the Green Belt boundaries 5 years ago and it was supposed to last for the 20 years. They indicate that the new boundaries will be preserved until after 2037.....but how could we believe that to be true?

5.1.21 - "The Council will apply this national policy in assessing proposals in Warrington's Green Belt."

Presumably this is the future Green Belt boundaries to which they refer. WBC need to better justify the need for release of Green Belt for these major developments.

6.1.21

Unfortunately, the 1970's switch from high street shopping to the Golden Square shopping mall put the nails into the coffins of the remaining shops on the high streets. That has meant that the Bridge Street area in particular has lost its vibrancy as a retail area. Instead it is now a no-go area in the evening due to late night bars and clubs. WBC should demonstrate HOW they are going to be able to attract retailers back to that location. Will they close down some of the bars and clubs that end up costing money for police to monitor?

7 - Objective W4

WBC have not detailed in the Local Plan, any changes to the road network, other than the proposed Western Link and a proposed dual carriageway across the Garden Suburb. This section of the Local Plan is blue sky thinking. Yes, there are diagrams showing potential updated/new crossings over the MSC but it is all without any definite solutions to the road / traffic problems for commuters in Warrington. Any new developments should not proceed without a more serious approach in how to accommodate the likely increase in both local traffic and through traffic, bearing in mind the higher numbers of HGV journeys that will result from such developments.

7 - Policy INF4 / INF5

Infrastructure includes hospitals, doctors, dentists, schools, social care, parks, policing, health facilities.

In the Local Plan, WBC recognise the need for a new hospital but currently do not have any solution. Nationally there are currently diminishing numbers of doctors, dentists, health carers, etc. and WBC need to demonstrate that there will be sufficient qualified people available to man surgeries etc., PRIOR to these centres being built. The Local Plan states that "developers" will have to provide certain elements of the infrastructure. But provision of a building is one thing. Having the relevant qualified staff available to make the infrastructure work is another. WBC need to demonstrate that the man-power will be available.

8.2

WBC have been notoriously poor in maintaining historic elements of Warrington. Instead of working with developers to try and "re-purpose" historic buildings, they typically bulldoze them and start again. Instead of the generic "aspirations" listed in the Local Plan, WBC should be more specific as to when and how they will preserve existing historic buildings. For example, the old "Packet House" pub on the corner of Mersey Street and Bridge Street. It is now in a total state of disrepair and an eyesore for people coming into Warrington. The Victorian swing-bridges across the MSC have not been painted for decades i.e. since Peel Holdings took over ownership of the MSC. If WBC cannot get Peel to fulfil their obligations on maintaining such bridges, what hope to residents have that WBC will honour any other "aspirations" that they have for the history of Warrington. Peel also own the Bridgewater Canal which has many listed hump-back bridges, again in various states of disrepair. WBC should state what they intend to do to get Peel to maintain them.

8.3 - Policy DC3

"Where a loss of, or negative impact on green infrastructure functionality or ecological system/network is unavoidable, development proposals should demonstrate what mitigation measures are proposed and/or replacement green infrastructure will be provided. Any replacement or mitigation measure should seek to secure a net gain in biodiversity"

I would like WBC to explain how, when planning to release 116 ha of Green Belt for a logistic/warehousing development, any developer is able to demonstrate mitigating or replacement green infrastructure! This is words for the sake of words and is meaningless. Developers can't just provide NEW green areas. Once Green Belt has gone it is lost forever.

"The two new significant country parks in Warrington Waterfront and the Garden Suburb."

WBC are simply taking over existing Green Belt land that supports pathways, bridle ways, etc across fields and through woodland and then making it into a sanitised "country park". We will lose ponds, areas of wild flowers, wild life, etc. which will not be supported in their plans. WBC are trying to justify building on Green Belt by including green areas, but we will be losing far more if this goes ahead.

8.4

The Local Plan lists many of the nature sites and sites of special scientific interests. It then goes on to state that development over such sites would not be permitted *"unless the Council decides that there is no alternative solution and there are imperative reasons of over-riding public interest for the development or land use change...."*

So in other words, they can do what they want and to hell with what we, the residents, have to say about it. This again is based upon flawed rationale for some of these developments in the first place. This is particularly the case with the Port Warrington / Warrington Waterfront development which will materially impact Moore Nature Reserve. We should be given specific details as to why it is necessary to develop on this site at the expense of losing part of a nature reserve.

9 - Objective W6

WBC do not show any Community Waste / Recycling area in the Garden Suburb even though it is listed under *section 10. Policy MD2.1*. The Local Plan does not detail where they may create a new site. The existing site at Sandy Lane Stockton Heath has been threatened with closure several times over the last few years. This would have meant all residents living south of the MSC having to travel across Warrington to sites located off Liverpool Road and Manchester Road, increasing car journeys and thus creating greater pollution. I would like WBC to show where a new community waste /recycling area would be planned if the Garden Suburb is to be built.

9 - Policy NV8

Air Quality: Large proposed developments such as the "six/56" being part of the Garden Suburb will, due to the logistics/warehousing businesses, result in thousands more HGV journeys around south Warrington and possibly through Warrington too. This is bound to have a negative impact on air quality for residential areas built anywhere near to these businesses.

Noise Pollution: The Garden Suburb map shows a dual carriageway cutting through the development. This will no doubt become a route for HGVs between the Stretton M56 junction and the proposed "six/56" and Barley Castle business parks. This will result in unacceptable noise pollution and impact on air pollution from this increased traffic. The road will also pass fairly close to a primary school.

So these are additional reasons as to why I object to the Garden Suburb and "six/56" developments.

10.2 - Policy MD2 - Warrington Garden Suburb

Increased housing in the Garden Suburb (5,100 by 2037) within that plan will result in a significant increase in road traffic. There are not any clear plans from WBC to accommodate the additional journeys into / through Warrington, where the town centre and crossings over the Mersey and Manchester Ship Canal are already very congested.

Most of the new housing will not be affordable for local people. Developers only need to build 30% of homes to be affordable. This will result in many locally employed workers travelling from outside of the area, resulting in even more car journeys. Many workers at the distribution centres / warehouses ("six/56" development) will travel from outside the area as they are likely to be low paid warehouse jobs.

The residents of houses in the Garden Suburb who work, are likely to commute to Manchester / Liverpool or even into central Warrington, resulting in thousands more car journeys every day which will contribute further to the chaos on our local roads and an adverse impact on air quality.

The loss of the Green Belt for this development cannot be reversed. The mitigating actions suggested in the Local Plan may be admirable ideas, but will not be the same as being able to walk across fields and through woods, viewing wildlife that currently exists. The Garden Suburb is indeed a sprawl of development from Central Warrington and encroaches on the countryside. Villages/hamlets such as Stretton, Appleton Thorn and Grappenhall will certainly lose their individuality. WBC have not clearly justified the "very special circumstances" for release of such an area of Green Belt land.

I have many other objections to this section of the Local Plan, but they have already been covered in earlier sections of this email, above.

10.3 - Policy MD3 - South West Urban Extension

WBC have not satisfactorily proven that there is the need for a further 1,600 homes in this location which will adversely impact part of the Moore Nature Reserve.

The traffic on the A56 into Warrington is already heavy during rush hour and thousands more car journeys will likely result from such a development, resulting in negative impact on congestion, air quality and noise pollution.

The council have not clearly demonstrated the "very special circumstances" that warrants releasing 112 ha of Green Belt land to enable this development. They need to justify why such a large area of Green Belt needs to be released, never to be regained in the future.

There are many other sections to the Local Plan covering Lymm, Culcheth, etc and I have the same opinions in respect of justification to be shown by WBC for the demand for such an increase in housing and employment areas, as previously covered above.

Regards,
George A Marsden