

From: [REDACTED]
To: [Local Plan](#)
Subject: Oppose local plan
Date: 17 June 2019 16 54 03

I am writing to strongly oppose sections of the local plan and in particular those which will lead to the decimation of the greenbelt in South Warrington. Not only is it morally wrong and completely against the will of the people (4000+ previous objections have been completely ignored and barely anything has been changed) it is also neither sound nor deliverable.

There are many parts of the plan especially those specific to defining improvements to Warrington town centre which are welcome as they do provide a vehicle for continued economic growth and central population increase for Warrington, however, in general, the plans are flimsy and there is a shocking lack of detail.

The consultation, which was merely a tick box exercise, did little to alleviate residents' concerns and in fact raised further concern due to the lack of detail and conflicting information.

The proposals to take precious green belt, which is protected by national policy, through the implementation of policy MD2, to satisfy overestimated commercial and population growth is unacceptable. The Policy, MD2, is unjust, unsound and completely against the wishes of the greater proportion of the residents of South Warrington. MD2 cannot be used to support the 'exceptional circumstance' in order to justify green belt usage.

It is an absolute outrage that at a time when people are more aware than they have ever been about how precious our greenbelt and countryside is and indeed, only this month the UK became the first nation to have officially declared a state of climate emergency we have plans demonstrating the wish to tear up our greenbelt for the use of warehousing, roads and houses.

As per the National Planning Policy Framework:

133. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

134. Green Belt serves 5 purposes:

- (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;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Proposals affecting the Green Belt

143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

144. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

145. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- (a) buildings for agriculture and forestry;
- (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- (c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- (e) limited infilling in villages;
- (f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- (g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

It must be recognised that there is a very strong view by the majority of residents of south Warrington against policy MD2 and the Garden Suburb, as can be evidenced from local interaction by way of combined local parish council objections, Neighbourhood plan groups, a large social media following, on-line petitions and a number of protest groups and that this PSV of the Local Plan is not the correct solution to meet the councils overinflated objectives. Public opinion and clear evidence highlights that WBC has hardly taken any notice whatsoever of the original voice of the South Warrington community with respect to the huge number of objections to the Garden Suburb development as originally proposed in the Regulation 18 consultancy conducted in 2017. Community should come before financial greed. The proposals in MD2 will in fact destroy the very established and much loved communities and countryside in South Warrington. MD2 is not being proposed for the greater good of the communities but instead is being used to support the commercially driven initiatives influenced by large business and private developers.

With regards to the "employment land" in South Warrington, which is not backed by any meaningful economic strategy for the town, not only will the proposed development be the biggest eyesores in what is currently a beautiful area of Cheshire countryside it will bring with it unnecessary additional

pollution. It is almost laughable that for example on Six 56's own website they state "We have assessed the potential impacts of traffic from the development on air quality. This has shown that the impact will not be significant given the level of traffic already using these roads and proximity of the site to the motorway". In other words, your air is already so polluted that by adding thousands more vehicular movements to the same area every day you will not notice the difference! This goes totally against the views of Public Health England (PHE) who on Monday 11 March 2019, published a review of evidence on how to improve air quality in the United Kingdom. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. We should therefore be limiting the amount of HGV's on our roads and the number of cars which will be used to go to and from work not adding to an area which already has high levels of pollution. Warrington topped the WHO report for the worst air in the UK. With concentrations of PM2.5 hitting 14 µg/m3, the Cheshire town tops the North West and the UK for worst annual PM2.5 pollution levels. This is above the WHO recommended limits of 10 µg/m3, and is well above the UK annual average of 9.6 µg/m3.

There are promises of jobs, however, the number of jobs also include those during the construction phase which are time limiting and the remaining jobs are in the warehouses and driving HGV's. We all know however that warehousing is going down the route of automation and the promises of jobs are to get planning permission. The jobs then won't materialise in the high numbers once promised or fade out quickly due to new technology. We are also looking at a driverless future for HGV vehicles and so these promises of jobs are also short-lived. There are several warehouses advertised in the surrounding areas as being vacant therefore showing that the need is not as great as anticipated.

Practically every week the M6 and M56 motorway networks are brought to a standstill due to an accident. The proposals for the employment areas alone will bring more traffic which in turn will increase the chances of this happening more frequently and with an increase in both HGV and commuter traffic not only are the chances increased but the standstill times will also be much longer both on the motorway network and the surrounding residential areas which are already used as rat-runs when these occurrences happen. This month an HGV was seen accessing a 3T limit bridge which crosses the Bridgewater canal at the bottom of Broad Lane, Grappenhall, trying to avoid the congestion!

The number of houses deemed necessary by the council is far greater than what is required and in fact upon inspection of the Population reporter tool on the Warrington Borough Council website this projects a population growth from 2019 until 2039 of 21k. At 2.3 per home that suggests a housing need of just 9k and yet the proposals are double that. The council instead are aiming for aspirational growth (through urban sprawl, destroying villages, character and landscape) and basing their figures on legacy data from 2014 reports which have since been superseded in 2016 and 2018 showing a reduction in housing need (as confirmed by letter from the Ministry of Housing, Communities & Local Government these are housing needs and not targets). This downward turn and the fact that the number of houses being proposed are based on inflated and aspirational figures demonstrate that the desire to build on greenbelt land is not "exceptional circumstances" and is not fully evidenced and justified. Greenbelt should remain untouched and should only be released in the very final stages of any plan because if the numbers required were to decrease further or other brownfield sites were to become available they should be used first.

An example of why greenbelt land should be used last is, for example, just this week the announcement came that Fiddlers Ferry would be closing. This site gives the opportunity for a massive brownfield site which can be cleaned up and used in the same way Bold Power Station & Rugeley coal plant have been. Bold Power Station is now providing 34-hectares of a flourishing residential community development consisting of high-grade residential properties and public open space. The regeneration plan involved: The creation of a landscape infrastructure to provide an attractive framework for redevelopment, The utilisation of existing watercourses to create new water features, lakes and streams, The construction of a road layout involving a primary distributor road and secondary estate roads and footpaths and cycleway networks to enable areas of the site to be used as public open space as a recreational/leisure amenity. The work involved a sustainable approach to regeneration using materials recycled from the foundation arisings and clean cohesive materials. A total of 16ha of land for residential developments and 18ha of public open space were created. Fiddlers Ferry also benefits from both Rail and water links and is a fantastic opportunity for redevelopment of brownfield over greenfield. Who knows what other brownfield sites will become available and these should all be used before greenbelt as the unnecessary use of greenbelt land cannot be undone.

Not only are the number of houses proposed an inflated target but they are an undeliverable target based on previous delivery of 550 new houses per annum compared to the proposed built rates which peak at 1600 per annum and also support the new issue of modular house building which are no more than cardboard boxes covered in bricks. Additionally, the area just cannot cope with that volume of people or traffic. There are ideas floated around that everybody will start to cycle to work or catch the bus but the system is nothing short of a joke. We no longer live in an era where people work 9-5 and the Wife stays at home to walk the children to school before returning home to wash, iron, clean and prepare the evening meal. Days are frantic and I wonder just how the council proposes that people are able to get their children to school safely and then get to work on time all by bike or by bus which both come with their own list of dangers from being too unsafe to cycle and breathing in fumes to the fact that there are no buses to get people to and from where they need to get to. I can only imagine that if only 5% of the people living in one of the 7000 proposed houses in South Warrington decided to catch an early morning commuter train from one of the railway stations in Warrington what utter carnage that would create on our road network (the latest newly built houses are all advertised as commuting distance to Manchester and Liverpool and prime access to the motorway networks!). It's all very well suggesting new roads such as the Westernlink (which now by WBC's own admission won't solve the town's traffic problems and will serve to act as an avoiding road for the Mersey toll so why increase traffic volume even further) along with other aspirational (yet lacking detail) infrastructure which will be grossly underfunded and therefore undeliverable but also there is nowhere for this diverted traffic to go to. It is just shifting the problem from one place to another. These proposals are not for a utopia Port Sunlight or Greenalls Brewery where people will open their front door and walk to work within minutes, the people living in the south of Warrington will not be working in the proposed distribution centres but instead will be going to the likes of Manchester and Liverpool and they certainly won't be getting the none existent bus into town to walk down Bridge Street in the evening to go for a meal.

None of the infrastructure proposed uses public money and it is unclear in the plan where this money is coming from (unless of course we are being paid off by the big companies to ensure they get "their own wishes").

There are vague crossings over the two canals which need to be crossed in order to get from south Warrington to the town centre and again no

mention of funding or the impact any proposals will have on existing residents.

Just hearing the phrase "we will have to concrete over parts of Moore Nature Reserve because that is what Peel Holdings are asking us to do" is enough to ring any alarm bells. This will be the same Peel Holdings who are purposely leaving our 3 swing bridges to rot for their own ultimate gain and who send a maintenance boat through said bridges at peak times when the work can be done at any time should be held to account and not pandered to.

To conclude, I do not believe that the proposed plans for south Warrington meet any of the criteria of "exceptional circumstances" which would lead to the decimation of our greenbelt for the sole purpose of commercial gain and council aspirations. There are far more factors which go against this proposal such as significant environmental harm, significant detrimental effect to community health and well-being and significant increase in noise and pollution both during the construction phase and upon completion which will span a 20 year period (which in itself is excessive). I therefore ask that you go back to the drawing board in the best interests of the town as a whole and its residents. Thank you.

Mrs Margaret Gaskell

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