

From: [REDACTED]
To: [Local Plan](#)
Subject: Local plan objection
Date: 12 June 2019 11:34:35

Dear WBC,

The national planning policy framework requires the plan to be aspirational but deliverable. This plan is not deliverable and it is unsound. Moreover, I believe that the economic growth targets have been set by those who have a vested interest in overstating growth predictions for their own purposes. Examples are Warrington & Co. and the LEP (Local Enterprise Partnership). There were 4500 objections to this development plan in 2016 and WBC has ignored them. In addition, the economic growth prediction figures used have come from the LEP without any major proposal to back up such a prediction. Official figures predict much slower growth than that detailed in the plan and hence there is no Justification to use such forecasts in predicting the Towns housing need.

The plan is not sound because the excessive economic growth underpinning WBC's forecast cannot be verified or justified. The scale and nature of what WBC is proposing will have a profound negative impact on south Warrington residents now and in the future. Given the uncertain economic outlook from Brexit and the certain climate emergency we face, it is shortsighted to build on agricultural land, especially not greenbelt land.

Instead of improving quality of life for people, the proposals will result in a serious deterioration in quality of life for residents, our children and future generations, and will cause a massively detrimental effect on our environment and climate, and our air quality.

I urge the council and planning inspectors to put aside short term financial gain from developers and council tax revenue, and do the right thing in protecting our environment and green spaces from unnecessary development.

The plan is not based on what is best for Warrington or South Warrington and its people - it is what is best for developers and WBC's coffers, in terms of council tax revenue.

The plan is not sound or deliverable because the housing need projections are based on unrealistic economic forecasts and housing projections.

- WBC states that it needs another 18,900 houses/dwellings for 44,000 people.
- But the official 2016 population growth prediction shows a population increase of 18,700 by 2041. This would require 7,800 dwellings/houses, and this could be achieved by brownfield development. This equates to 343 new homes per year rather than WBC's proposed 945. The figure of 945 is more than double the current build rates (359 in 2018/19).
- This shows that the WBC projected housing numbers are much too high. The lowest number of houses should be used in the development of the local plan.

The plan is not sound or deliverable because there is no justification for the predicted growth levels.

- The plan is not sound or deliverable because the figures about economic growth are not justified. The economy is not certain and there is a great deal of economic uncertainty affecting all sectors. The figures about economic growth cannot be justified and should be downgraded.

The 1600 houses planned for Walton will all be for commuters driving in and out of Warrington because there is no employment in that area.

- The 5000 houses planned for the Garden suburb will also be for commuters driving in and out of the area. Any new jobs in the area will be distribution/logistics related (a sector which is increasingly automated) and the remuneration levels of the new jobs (typically poorly paid and short/zero hours contracts) will not be matched to the costs of the new houses.
- There is no economic plan to justify such large-scale expansion of Warrington.

The plan is not sound or deliverable because is no justified or proven need for greenbelt release.

- WBC states that it is protecting 90% of Warrington's greenbelt, but the local plan will decimate 90% of south Warrington's greenbelt. There is no development planned on greenbelt for north Warrington.
- As well as the earlier point that the housing projections are incorrect, brownfield sites are available and more are likely to become available. There is no need to release greenbelt land for development when the hospital site at Lovely Lane and Fiddlers Ferry power station are anticipated to be available for brownfield development within the timeframe of the Local Plan.
- National planning policy revisions have strengthened the status of the greenbelt. There are special circumstances to release greenbelt. There is no case or special circumstance to release greenbelt, and WBC's figures are not justified and based on unrealistic economic forecasts and population projections.
- Greenbelt land should be the last to be built on, not the first.
- There are clear criteria that exist before an authority can justify changes to greenbelt. The National Planning Policy Framework says that 'a local planning authority should regard the construction of new buildings as inappropriate in greenbelt. None of the exceptions fit the proposed development so there is no case to release greenbelt land in south Warrington for development.
- WBC has a vision for a vibrant town centre surrounded by attractive settlements and countryside. If the local plan goes ahead, WBC says that 10% of greenbelt will be used, but all the greenbelt land for development is in south Warrington.
- WBC has made no plans to develop land in the town centre. The council should be looking to build up in the town centre (apartment buildings for young people and retirement apartments), rather than sprawling out executive developments into the greenbelt, where people will not be walking to work, but will be commuting into Warrington or Manchester/Liverpool, thus increasing the load on motorways and roads that cannot cope with the existing traffic.
- If the plan goes ahead, the distinct characters of Stretton, Stockton Heath, Walton, Grappenhall and Appleton Thorn will all be lost. Valuable wildlife areas like Moor nature reserve would be ruined, and the aesthetic appeal and character of south Warrington would be lost. This is contrary to the 'Vision for Warrington's future' detailed in the plan.
- There should no development that destroys the character and distinctiveness of the area
- Using Warrington's greenbelt for development should be a last resort after all other options have been explored, but if any greenbelt is needed, it should be spread more evenly and not all in south Warrington.
- The development will destroy a huge amount of beautiful countryside and the biodiversity that it supports. We have a climate emergency so should be looking to protect our environment and not destroy it with housing estates.

The plan is not sound or deliverable because the traffic infrastructure proposals are completely inadequate to address the existing problems of congestion, noise and pollution in south Warrington.

- There are no clear plans for infrastructure changes or how they will be funded.
- The plan is not sound or deliverable because 4000 houses will require more schools, GP surgeries, dentists, libraries, community resources etc. Existing schools, GP surgeries and dentists are all full to capacity and cannot take on the increased population. What guarantees are there that schools, GP surgeries etc will be built and staffed? The local plan is not based on sound projections or plans and is undeliverable.
- The plan is not sound or deliverable based on infrastructure. South Warrington's roads, canal crossings and motorway junctions are gridlocked at rush hour in the present day, and cannot cope with the existing traffic. There is no way that the existing roads could cope with new industrial developments such as Six56 and Stobarts, or the increased traffic generated by over 4000 houses. If each new house/dwelling has 2 cars that will result in 8000 more cars on south Warrington's roads. There are no plans about routes or details for new roads.
- The council leaders have said that no houses would be build before infrastructure is put in place, but the costs and plans for the infrastructure changes necessary for the local plan are not clear, not detailed, have been underestimated and must be challenged.
- Equally unlikely is the chance that the owners of 4000 new houses would walk to work. Warehouse/distribution work is low paid and people are generally on short or zero hours contracts. There is increasing automation in this sector, and people working in such facilities would not be able to afford new 'executive' homes so the owners would be commuting to and from Manchester or Chester, increasing the load on the existing motorway and road network, and increasing air pollution.
- Air pollution is a serious problem, and is a big issue in Warrington, which already has gridlocked roads and too much traffic to cope with its roads and roundabouts. Air pollution and climate change will mean that Fiddlers Ferry power station will shut in the next few years so that site will be available for development. Adding HGVs and 4000 - 8000 cars to the existing high levels of air/traffic pollution will make matters worse. The council should be looking to build up in the town centre (apartment buildings for young people and retirement apartments), rather than sprawling out executive developments into the greenbelt, where people will not be walking to work, but will be commuting into Warrington or Manchester/Liverpool, thus increasing the load on motorways and roads that cannot cope with the existing traffic.
- Warrington already has substantially increased traffic from people avoiding the Mersey Gateway toll bridge, so cannot cope with more HGVs and cars.
- Warrington's air quality analysis shows that Warrington has one of the worst air quality levels, leading to 145 premature deaths a year. If this greenbelt land is released for development, WBC will be responsible for causing many more premature deaths.
- Although there is a promise of road improvement to the motorway junction, the motorway junction will cause the congestion (not the roads leading to it), so Highways England will need to schedule and budget for new and dedicated motorway access. The junction 20 of the M6 /M56 is already severely congested and would need to be modified and expanded for the necessary increased traffic volumes (because the only industry in the vicinity will be increasingly automated, unskilled logistics jobs).

The plan is not sound because it is based on a greenbelt assessment that was flawed, not transparent and should be disregarded because of conflicts of interest.

- The consultancy that WBC appointed to carry out the greenbelt assessment, Arup, advertises itself as a strategic partner to Peel Holdings, who owns large tracts of South Warrington land put forward in the 2016 call for sites, and who have a vested interest in the development to open up Warrington for development. Arup assessed the greenbelt, and despite it fulfilling all the roles of the greenbelt as outlined by the CPRE, and being lush farmland full of crops, flocks and wildlife, judged that the greenbelt land was making a 'weak contribution' to the greenbelt and should therefore be released for building.
(<https://www.warrington.gov.uk/info/200564/planning-policy/1905/evidence-base/3>) If Arup's assessment was that the land was a 'strong' contributor to the greenbelt, there would be no case for greenbelt release. Arup's links to Peel and WBC (senior members of Arup, WBC and Peel are all on the Atlantic Gateway's board) mean that Arup's assessment was not impartial, subject to bias so should be disregarded.

Other points to demonstrate lack of soundness

- The plan, and WBC's decision to press ahead with it, (despite 4500 objections in the last consultation that it has completely ignored) are not sound because they are based on bias and conflicts of interest. The Atlantic Gateway board includes people from all the following: Stobarts and Langtree (who have submitted applications to build warehousing/distribution facilities on greenbelt), Arup (who published the greenbelt report saying that the area's greenbelt was "weak" and should be built on), Peel (who are leading the development of the Warrington area as part of their Liverpool to Manchester plans), Terry O'Neill, (Warrington borough council chair) and Steven Broomhead (Warrington borough council chief executive). All parties have vested interests in the development going ahead.
- The plan is not sound because there is no need to have a plan for 20 years. A plan for 15 years would be much more appropriate.
- WBC received 4500 objections to the last consultation but has disregarded them all and is pressing ahead with this undeliverable and unsound plan that needs to be reviewed urgently.

Yours faithfully

Richard Palombella

