

Planning Policy & Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH



15th June 2019

Dear Sir/Madam,

Re: Local Plan for Warrington

I would like to make the following comments in opposition to the Local Plan. For Warrington I have included some points below, but these by no means reflect the full range of issues at stake in this poorly thought out proposal that fails to implement an appropriate future strategy to help Warrington and its residents and also blatantly disregards the wishes of the local population through further unnecessary urbanisation of rural and semi-rural land. Disappointingly the arrogance of planners and council leaders has also failed to take into consideration the numerous and detailed responses to the original PDO. Overall the plan is unsound for numerous reasons.

1. Inappropriate use of Green belt land

- 1.1. **There are no exceptional circumstances presented to justify building on green belt land** in South Warrington. Green belt land was previously designated as such to secure it for the enduring future and it should only be built on in **very special circumstances**. This is not the case in Warrington, as there is plenty of brownfield land available to develop. Additionally, the recent announcement in relation to the imminent closure of the Fiddlers Ferry plant means that the whole plan should now be revisited to take into account the availability of this large site and consider options for how this space could be most appropriately utilised. There is also a significant amount of **deserted or derelict property** in Warrington which should be targeted for re-use.
- 1.2. **Green belt land and boundaries dramatically increase the attractiveness and desirability** of areas that would otherwise be an urban sprawl. The plan contradicts and undermines some of the aims of the “Warrington Means Business” document through the planned targeting of green belt land in South-East Warrington. The Warrington Means Business document indicated that “*the Green Belt Setting*” and the “*link with the Green Belt*” which “*give Warrington a real distinctiveness and an enviable quality of life*” – this is true and the value of this should not be ignored for the sake of short-term greed. Once it is gone it will never be restored.

2. Misguided local policy and naïve strategic aims for the region

- 2.1. The provision of the suggested amount of new housing **is not sound and not the right strategy** for Warrington. There is inappropriate justification within the plan to indicate why this level of housing was chosen, and the timescale should only be looking ahead to the next 15 years (not 20) in order to allow appropriate revision and revaluation. The implications of **Brexit** have not been appropriately addressed or anticipated. Based on the uncertainty due to Brexit, HS2 and technological advances it is more appropriate for a 15-year plan to be developed rather than trying to anticipate (and overestimate) the 20 year plus needs.
- 2.2. Warrington should **remain limited in size and sprawl**, and not become part of a massive urban city corridor (from Liverpool to Manchester) across the North West of England. Instead it should aspire to being greener and proud of retaining its history, heritage and village identities.
- 2.3. Achieving the further population and aspirational economic growth is **not an appropriate course** for Warrington particularly based on its location between two attractive, successful and long-established major cities. The scale of the proposals within the document are also unrealistic and undeliverable.
- 2.4. Provision of land for businesses and employment will lead to increased influx of people and therefore increased demand for housing thereby **exacerbating any current shortage of housing** that the proposal claims to be addressing. This positive feedback loop will further exacerbate existing problems.
- 2.5. There appears to be unjustified economic growth assumptions based on old data and ambitious assumptions. For example, population growth figures are based on **out of date** (2014) forecasts rather than more recent 2016 population growth figures.
- 2.6. Increased emphasis on logistic and transport warehouses and developments **will not lead to significant employment opportunities** for the local population. These arguments are unsound as there is clear evidence for rapid progression to automation, at the expense of jobs, in this sector ("*... the industry's most labour-intensive processes are on the way to being fully or partially automated...*"; Reference: Shifting patterns: The future of the logistics industry; PWC 2016; www.pwc.com/transport)
- 2.7. Resources and planning should instead be targeted to develop and regenerate the current confused and failing town centre with erratic, unattractive and inconsistent development.
- 2.8. The town centre is a victim of previous poor planning, and **a woefully poor transport infrastructure** that will always be limited by the network of canals and rivers. Provision of new roads will simply increase congestion nearer to the town centre bottlenecks and provide increased air and noise pollution elsewhere. The proposed changes to the transport network seem to be insufficient and vaguely aspired to.
- 2.9. **Any housing/flats would be better placed within walking distance of the town centre** to reduce reliance on transport, promote cafes and pubs, and lead to regeneration within the town centre
- 2.10. WBC is **biased towards the potential financial benefits of any plan**, rather than the best interests of the community, through its business investments and commercial links. These have also not been openly and explicitly declared at an individual or corporate level.
- 2.11. Local infrastructure needs in relation to **hospitals** and schooling, has not been soundly and adequately addressed. The plans are vague and with no evidence of how the associated substantial costs will be met.
- 2.12. The wider network of roads is already unable to cope. **Development around the periphery of Warrington will be attractive to commuters hoping to work in Manchester or Liverpool** and lead to increased demand on the M6, M62 and M56 which are already completely unable to

cope with capacity during commuting hours, during peak travelling days, and in the event of any accident or disruption.

- 2.13. WBC have a history of withdrawing services and having insufficient money to complete proposals as stated. I do not believe that any **realistic or secure source of income** has been proposed (let alone guaranteed) that would facilitate the overarching infrastructure. The overall plan is unsound and undeliverable. Based on previous historic developments within Warrington it is likely that the revenue generating housing and industrial developments would proceed but the required infrastructure development would be neglected as it would transpire that it was then too expensive and no longer a necessary priority.

3. Local issues relating to Grappenhall and other local villages

- 3.1. The fields between Grappenhall and the M6 provide **an attractive entrance route to Warrington** from the most substantial and important access point from the motorway. **This will be significantly negatively impacted.** This development will further Warrington's unfortunate reputation as a poorly planned, unattractive urban sprawl with no visible and defined green boundary.
- 3.2. There is a **significant bat population** living around the Bridgewater canal in Grappenhall. This should be safeguarded and a specialist survey should be conducted to ascertain if development is likely to impact on its wellbeing.
- 3.3. All the farm owned green belt land in South East Warrington appears to be productively used for agriculture or farm animal grazing. This maintains **a pleasant rural feel** to this part of Warrington.
- 3.4. Discouraging outdoor physical exercise due to loss of pleasant outdoor spaces for recreational and fitness activities, together with the possibility of increased air and noise pollution, is likely to **have a negative impact on the health and wellbeing** of residents and visitors. These would **not** be compensated for through the provision of a false, artificial 'country park' (or equivalent).
- 3.5. Proposals for expanding lorry parks around the M6 junction 20 are dangerous and likely to significantly increase delays and make the roads more dangerous. The type and nature of the vehicles represent a significant danger to cyclists and other road users. **Lorries are seven times more likely to be involved in fatal crashes on minor roads** than cars as the size and weight of HGVs mean that they have a disproportionate adverse impact on the road network and other road users in terms of exposure to collisions, congestion and pollution (Ref: Campaign for Better Transport; Dec 2017). This type of development will also impact the wider community through increased noise and air pollution. Air pollution from increased traffic of all forms is increasingly correlated with negative health outcomes for the local community, which ultimately will increase the economic burden on local healthcare as well as decreasing the attractiveness of the area for newcomers.
- 3.6. The whole proposal represents a massive change in character for the local communities in Grappenhall, Thelwall and beyond. This would be **a catastrophic move that would lead to irreversible loss of identity for the area.** The remaining villages have a sense of distinctiveness in terms of character and resident 'belonging' – this has been demonstrated by the huge local outcry to both the original and updated plans.

4. Inappropriate Consultation Process

A duty of fairness which has not been respected in relation to the local plan:

- 4.1. The consultation meetings took place in inaccessible town centre locations. This was despite significant previous representations at local village centres when the PDO was being considered originally. Public meetings **were not held in key areas affected** (e.g. Grappenhall, Appleton) thereby limiting opportunities to engage in the process.
- 4.2. Deadlines for responses have been aligned to large scale, distracting and premature proposals for large lorry parks adjacent to the M6 at Junction 20. This has clearly resulted in confusion for the local population who wish to voice their opinions.
- 4.3. The document was **very lengthy, confusing and contained significant jargon** and terminology that was unfamiliar to those not involved with planning.

Please do not miss an opportunity to act on the views of your local population and safeguard Warrington's future by preserving what remains of its attractive landscapes and historic local villages. Do not lose the charm and distinctiveness that this town holds.

Yours faithfully,

Rob Oliver

[Redacted signature]

Email: [Redacted email address]