



Dear WBC and inspectors,

I would like to object in the strongest terms to the local plan. The Garden suburb planned for south Warrington is a concept universally derided and despised by south Warrington residents. The garden suburb would constitute inappropriate development within the Green Belt and by definition would be harmful to the Green Belt, and in addition the very special circumstances needed to release greenbelt have not been provided to outweigh the harm.

South Warrington residents are frustrated and angry that despite receiving 4500 objections to the plan in 2016, WBC has NOT listened to anyone else apart from greedy developers, and have not changed the plan at all. It is almost identical to the plan consulted on in 2016, that drew 4500 objections.

The local plan is not deliverable and not sound. I would ask the inspectors to challenge it on the basis of lack of transparency and a high level of bias, because Arup, who carried out the greenbelt assessment for WBC have strategic partnership links with WBC, Peel Holdings and Langtree, and carry out regular greenbelt assessments on land that Peel and other developers wish to release from the greenbelt (see Chester, Cheshire East). The ARUP Green Belt Assessment (2016) requires a robust challenge from the Inspector. It underpins Policy MD2 Garden Suburb in the Local Plan. The WBC Landscape Character Assessment from 2007 makes little differentiation between Green Belt areas and essentially recommends that they are enhanced and conserved. Arup's 2016 assessment of the greenbelt land as making a 'weak' contribution should be challenged on the grounds of Arup's conflict of interest and bias - please see the board of the Atlantic Gateway (https://www.atlanticgateway.co.uk/board-members).

This local plan should be reviewed and revised in light of the government's commitment to cut greenhouse gases to zero by 2050. Colin Daniels, chief executive of Warrington Chamber of Commerce and Industry, has said (quotation 13.6.19): "How does that fit with the borough council's Local Plan? They are going to destroy large parts of our Green Belt so where are they going to plant trees? Only a very limited number could be planted in urban areas. What about air quality? It will suffer from the increased number of vehicles, houses and logistics centres. This government announcement just cannot be ignored by the planners."

Fiddlers Ferry power station is to be closed by the end of March 2020, which will free up 330 hectares of brownfield land, which could be developed into housing instead of decimating our valuable greenbelt land.

I would like the inspectors to take into account the following points:

- 1. A proposal for 7000 houses in the Green Belt in one authority cannot be sustainable and is not deliverable.
- 2. The plan is not sound because there is a fundamental weakness in the assumptions around housing need and growth. The new proposals for the UK to lead on cutting greenhouse gases now overrides the need for new housing targets previously set, as they are outdated.
- 3. WBC has a duty to use brownfield sites for development before greenbelt. Greenbelt release should be as a last resort but for WBC it is the first port of call. WBC says 90% of Warrington's greenbelt will be kept, but 100% of the greenbelt to be released is in South Warrington. If any greenbelt is to be released it should be spread equally across Warrington. It is not right that South Warrington will lose 90% of its greenbelt. Moreover, there is no need to release greenbelt land for development when the hospital site at Lovely Lane and Fiddlers Ferry power station will be available for brownfield development within the timeframe of the Local Plan.
- 4. This land is not "spare" but supports existing farms and rural businesses, as important to protect in our troubled times of climate change, air pollution, environmental disaster and Brexit.
- 5. Given Brexit and climate change it is shortsighted to build on agricultural land whether Green Belt or not

- 6. The important issue of gaps between settlements cannot be considered without showing the plans and ambitions of neighbouring authorities. Warrington should not be joined to Halton, St Helens, Greater Manchester (particularly Wigan and Salford) and the "Cheshire" towns and settlements to the South.
- 7. The first thing to consider before planning for expansion greater than the "natural growth", referred to in the past, is infrastructure. Warrington is in a contradictory position being "well served by motorways" but these motorways are now not fit for purpose. Journeys on them are unreliable given the high volume of traffic and frequent accidents and blockages. The situation will be exacerbated by large proposed/approved logistics/employment sites to the North along the M6 and M56. There are also vehicles coming to Warrington to avoid the Mersey toll bridge. It is not just the motorways that are congested but our local roads, which are already gridlocked at rush hour.
- 8. The delivery of strategic and local infrastructure needed is not feasible or deliverable given the financial situation. It should be noted that under present planning rules developers can renege on infrastructure commitments previously agreed.
- 9. We also have the damaging HS2 2b route affecting the East and North of the Borough, although it will, when under construction, cause major problems to anyone from a wider area wishing to travel to and from the East.

I call for WBC to listen to the local people when putting together the local plan, and not developers. WBC have completely ignored the will of the 4500 objections to the Garden suburb and PDO in 2016, but this plan is biased, flawed, unsound and undeliverable and should be rejected by planning inspectors.

WBC should look to use brownfield sites first, building apartments in the centre of Warrington for retired people (to be near shops and facilities) and younger people to get on the property ladder), and building up not outwards; and also taking into account the vast amount of land on the Fiddlers Ferry site that will be available in March 2020. WBC should use greenbelt as a last resort not a first port of call, and any greenbelt release should be spread more equally around Warrington, as the current plan has no greenbelt release in North Warrington, which is neither fair nor equitable.

Regards,		
Sarah Palombella		