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27 May 2019

To whom it may concern,

### **Objection to Local Plan (Consultation)**

I have now considered in detail the proposed Local Plan covering the period 2017 to 2037 and wish to make a number of observations and objections that, together, make it clear that the Plan, as it stands, is not sound.

I will set out my objections and concerns below.

#### **GREENBELT**

- The loss of 600 acres of Green Belt is not properly justified.
- The Green Belt boundary was only confirmed 5 years ago in a plan that was supposed to be good for 20 years. This must call in question any plan now suggesting it has a currency of 20 years.
- The Plan reduces Warrington's Green Belt by 11% and almost all the land targeted is in South Warrington. As a result, it impacts on the rural/ semi-rural parishes **Appleton, Grappenhall, Stretton, Walton and Moore** especially hard – inequitably so. Little thought appears to have been given to releasing Green belt across Warrington Borough?
- The Council should look more carefully at brownfield sites in the town, rather than the easy option of using Green Belt land.
- The environmental and ecological impact of the loss of Green Belt has not been accurately assessed.
- The proposed Garden Suburb in Grappenhall will result in a huge loss of Green Belt. **4200** dwellings would be on Green Belt and there would also be giant warehousing facilities. This will fundamentally and irrevocably change the character of a whole area but, as I will indicate, with little economic or social justification for doing so.

#### **HOUSING**

- Around 5000 new homes in total would be built in the 'Garden Suburb' to the south east of the Borough, up to 2037, with the potential for 2300 more homes beyond this date.

- An urban extension to the south west would provide a further 1600 homes at Walton which would triple in size and remove part of Moore Nature Reserve
- Most of the new housing will not be affordable for local people, as developers would only be required to build a maximum of 30% affordable homes which is not enough.
- Workers at the warehouses and distribution centres (the suggested economic engine) will almost certainly have to commute from outside the area – so with little economic benefit to the community, but with significant impact.
- New homes in the south would also be too far from both our railway stations, meaning massively more car use across town.

## **ECONOMIC GROWTH**

- The Council is being far too ambitious with growth predictions based on unrealistic levels of activity and development, and using growth rates which have never been achieved before? This is the flimsiest of modelling.
- There seems to be no understanding of how development in Warrington should take account of what is happening in the Greater Manchester City Region, the Merseyside City Region and wider Cheshire. One only has to visit Manchester to see the apparent explosion in economic activity and associated building.
- Growth, here, seems to be seen as being driven by new housing itself creating economic benefit, instead of the other way around. Economic development needs to be planned strategically with sound, tried and tested models and data; and housing needs should follow that development

## **INFRASTRUCTURE**

- There is no new route into town from the South East and the Plan still relies on the three, Victorian swing bridges to traverse the Canal.
- The Infrastructure Delivery Plan is dependent on already overstretched roads and bridges and there is no confidence that the infrastructure needed can, or will, be delivered either in the main settlements or the smaller outlying ones, like Lymm.
- This local plan makes no meaningful connection with the integrated dynamics between health, education and economic growth. There is no serious plan for provision of key services including health and education. Indeed, the CCG for Warrington is already significantly underfunded when compared with other parts of the country. – and work of the health and wellbeing board identifies that health demand can only grow for demographic reasons.
- It is encouraging that the Council is supportive of a new hospital, but that is at least a decade away with no site and no means to fund it now; and with the old facility already overstretched.

## **CONGESTION, AIR POLLUTION and ENVIRONMENTAL**

- The environmental and ecological impact of the loss of Green Belt has not been accurately assessed.
- The development proposed does nothing to ease existing problems of traffic congestion and air quality and can only make things worse.

- There are already huge issues in terms of environmental challenges in these villages and surrounding area. These are major access routes to the Town from the M6/ M56 and there are already huge problems with litter, for example.
- On occasions, the detritus on the verges looks more like third world rather than first - a truly negative impression for people entering the borough via these key, access routes.
- The Council's health and safety rules mean that it is an incredibly rare event for the council to clear these verges – as they must shut the road – and the proposed increase in distribution centres means this unpleasant situation can only get worse.

## **TOWN CENTRE**

- The proposals would not trigger regeneration in the town centre. If anything, it could make matters worse as the congestion and poor access from South to North would make it even more compelling for people to go to Manchester or the Trafford Centre. The journey time is about the same – indeed with the road improvements now taking place on the M60 it could even be quicker to go to the Trafford Centre. And even in the other direction Chester and Cheshire oaks become even more attractive propositions.

## **OVERALL CONCLUSIONS**

- I doubt strongly that the Plan is deliverable – as its basis is unsound.
- The housing numbers which drive it are unrealistic, in relation to Warrington's track record. Instead of pressing ahead with these numbers, there should be greater challenge from within Warrington Council about what is practically achievable.
- There also needs to be serious liaison with neighboring local authorities.
- Details of the plans for roads are very vague. The only firm proposal is for a new wide dual carriageway strategic road running parallel to the M56 linking Barley Castle industrial estate to Junction 10. This is likely to become a racetrack for lorries, doing nothing to support the proposed new housing. Specifically, there is nothing planned to improve the A49 as it goes north from the M56.
- There is no definitive proposal for how the residents of South Warrington will get into town, either by building a new road or by using more creative solutions.
- There *is* no detail of how the Plan will result in regeneration in the Town Centre or preserve the identity and distinctive character of our area, both of which are Warrington Council policy objectives. On the contrary the Plan appears nothing more than aspirational (overly aspirational) thinking, in terms of regeneration and economic development.
- The Plan does not clearly show what the 'very special circumstances' are for development in the Green Belt.
- The most likely outcome is that many houses will be built on Green Belt, but the supporting infrastructure will not be delivered.
- We risk our Green Belt being sacrificed for the sake of an over ambitious plan.
- The integrity of all the identified villages would be threatened.

I would be happy to expand on the points made here and hope that my concerns and objections are treated with due seriousness and integrity.

Yours faithfully,

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MR. S.McGuirk