

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

28th September 2017

Dear Sirs

The Warrington Borough Council Local Plan Preferred Development Option Regulation 18 Consultation - July 2017

Victoria Buildings Lewin Street Middlewich Cheshire CW10 9AT

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It is disappointing that having completed the Local Plan in 2014 external pressures have forced the Borough Council to reconsider. Warrington has a record of exceeding housing allocations and the Inspector began that Local Plan deliberation by commenting that this was the first time he had found an authority with an overprovision of housing. It was generally acknowledged that Warrington had come to the end of its New Town growth, and should now have "natural" growth.

The following comments were sent to our Warrington CPRE members earlier in the consultation.

- 1. A proposal for 9000 houses in the Green Belt in one authority cannot be sustainable.
- 2. This land is not "spare" but supports existing farms and rural businesses.
- 3. Given Brexit and climate change it is shortsighted to build on agricultural land whether Green Belt or not.
- 4. 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.
- 5. 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. There will also be vehicles coming to Warrington to avoid the two Mersey toll bridges. It is not just the motorways that are congested but our local roads.

Cont'd...

Patron

H.M. The Queen

President

Lord Grey of Codnor

Chairman

Andrew Needham

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- 6. It could be said that Warrington's success is a result of the previous Regional Spatial Strategy controlling the location and amount of development, concentrating on developing town and city centres.
- 7. The delivery of strategic and local infrastructure will be difficult given the financial situation. It should be noted that under present planning rules developers can renege on infrastructure commitments previously agreed.
- 8. 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.
- 9. It is disappointing that we are likely to have a spiral of alternately matching housing land to employment land and employment land to housing.
- 10. The new objectives:- W1 -suggest delete the bullet points and then after the word "whilst" at the end of the first paragraph add "supporting Warrington's ongoing success".
- 11. Concern that W2 may result in "safe guarded" land which in practice cannot be safe guarded once removed from the Green Belt.
- 12. Support W3, W4, W5 and W6
- 13. Minerals and Waste policies should consider the large amount of landfill in the Warrington area in the past, its damaging impact on the town and the opposition of residents to further landfill.

In addition:

Q1 The way forward is not to commit to this massive Green Belt loss. This scale of loss is certainly not sustainable development and goes against the NPPF. Please consider looking at a 15 year plan as has been suggested by others.

There are so many variables from changes in National Planning Policy to Brexit, climate and political change and food security as well as new brownfield sites such as Fiddlers Ferry becoming available. There is a danger that employment land and housing land will keep increasing in a competing spiral.

Q2 The necessity is for a thriving town centre, whether a city centre or a town centre. We query the amount of employment land as the important thing is to create your own customer base for shops and businesses. The centre is an existing transport hub for rail and a radial bus network so should be exploited, rather than by developing Green Belt sites in the probably vain hope that money could be found for infrastructure.

Q3 No - as we believe such a massive Green Belt loss is unsustainable. Do not support safeguarded land as in practice it is unlikely to be protected from development.

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Q4 Partly.

W1: delete the bullet points and then after "whilst" add "supporting Warrington's success" Note we do not support the New City aspirations if it means the use of Green Belt

W2: the "sensitive release" implies the use of safeguarded land which we do not support. We do not support the use of Green Belt.

W3: strongly support.

W4: support with the proviso that growth is appropriate. The problem with new roads is that in

solving existing problems they can create new ones.

W5: support - it is important local residents are involved.

W6: support.

Q5: should have considered the lowest housing figure possible plus a 15 year plan.

Q6: -

Q7: No, this is not the approach because of the present uncertain situation re policy changes, competing authorities Brexit, financial insecurity, HS2, climate change and food security. Q8: no detailed comment - but pleased that the regeneration and evolution of the town centre is a priority with the redevelopment of Bank Quay Station and the improvement of strategic rail links.

Q9: public transport links are important as is the retention of public open space. Q10: -

Q11: do not support this as it is too large, uses green field and green belt farms and is not economical in the use of land. This reduces the gap between settlements and should be seen against the existing permissions and aspirations of Halton Borough Council. This relies on infrastructure improvements that are unlikely to happen.

Q12: -

Q13: these areas have contributed to the housing supply in the past and should rely on natural growth rather than green belt use. These areas an are asset to Warrington and gaps between settlements should be maintained. There will still be Natural Growth. Lymm, Hollins Green, Culcheth and Croft are all blighted by HS2. We are concerned that plans showing the Green Belt.

Categories have altered because of HS2. There is much that has not yet been decided about route 2b and of course it has not yet gone through Parliament. HS2 needs recognition in this plan, but only to show where land cannot be used because of the width of the landtake, and the land needed for mitigation and community compensation.

What is worrying are the large areas proposed by others in the Call for Sites. It is right that these have been rejected by the Borough Council but note we are opposed to these disproportionately large sites being used.

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Apart from the reduction of gaps between settlements, damage to the loss of openness and the loss of agricultural land the issue of how they exit onto local roads is a serious concern.

Q14: our concern is for over provision from the combined Local Authorities given the lack of

regional overview. We oppose the use of Green Belt land as other is available. The Green Belt is employment land already, as well as farms there is an Equine economy that should be recognised. The provision in neighbouring authorities should be part of the discussion.

Q16: one of the problems with Mineral Extraction is that it can leave a hole which may attract landfill. Minerals and waste policies should take into account the large amount of landfill in the

Warrington area in the past, its damaging impact on the town and the opposition of residents to further landfill.

Q17: Warrington has good agricultural land, there should be a policy protecting it. Housing provision figures should also contain details of proportions of different types of housing so that there is some local control.

Yours faithfully

Jacqui Johnson Warrington District Representative

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