



Stretton Parish Council

C Walker Esq
Development Manager
Warrington Borough Council
Economic Regeneration, Growth and Environment Directorate
New Town House
Buttermarket Street
Warrington
WA1 2NH

26 September 2017

Dear Mr Walker

Re: OBJECTION to Warrington Borough Council's Local Plan & Preferred Development Option (PDO) Consultation

Stretton Parish Council wish to register their **STRONG OBJECTION** to the proposed Warrington Borough Council's (WBC) Local Plan and Preferred Development Option for the City Garden Suburb, specifically but not limited to the points detailed below, including; the lack of infrastructure which is currently of major concern to the Parish Council and residents, and which has been repeatedly highlighted to WBC; the lack of clarity as to whether a full investigation has been undertaken relating to available brown field sites prior to considering high premium Green Belt land options and; the basis on which the Plan has been drawn up, e.g. impact of Brexit has not been assessed, lack of consideration for current utilisation levels of lettable properties/commercial buildings, outdated forecast data.

Outlined below are the many factors which Stretton Parish Council believe make the Local Plan and PDO an unviable option.

- 1) Forecasts - the Local Plan was prepared pre-Brexit, therefore all forecasts are out of date and need to be re-assessed.
- 2) Release of Green Belt land. The Local plan;
 - a. Does not demonstrate that all possible brown field sites have been identified or reflect current levels of under occupancy / under-utilisation.
 - b. Does not present an alternative option if Fiddlers Ferry closure is announced.
 - c. Does not assess the impact of lost Green Belt on the security of food supply.

- 3) Infrastructure and Transport. The Local Plan;
 - a. Does not include a fully proven transportation model / analysis, and makes no provision for modern, green, public transport solutions.
 - b. Does not indicate the impact upon air quality / pollution levels arising from the development.
- 4) Protection & Enhancement of Existing Facilities. The PC believes that the Local Plan;
 - a. Pays no regard made to the housing needs of older residents or single occupancy needs.
 - b. Fails to protect or develop existing village culture and facilities or address known current infrastructure problems.
 - c. Section 4.48 states that in Lymm and Culcheth “settlement extensions of this (large) scale were considered unreasonable due to the scale of impact on the character of the existing settlements”. Why has this argument not been used to restrict the proposed developments in Appleton, Grappenhall, Stretton and Walton?
- 5) Review Process. The Parish Council does not believe that WBC has undertaken the extensive research necessary on which to base the Local Plan.

Taking each of these above points in turn, the Parish Council would like to further expand and comment as follows.

1) Forecasts

The Parish Council does not believe that the current forecasts or models are reliable enough to form the basis of a long-term plan;

- I. The Plan needs to reassess all its data to take in the impact of the Brexit vote and amend all demand forecasts.
- II. WBC need to demonstrate that details of all existing brownfield sites have been identified and included in the Plan.
- III. WBC need to indicate the levels of capacity available in unlet employment premises / sites and ensure these are factored into demand forecasts.
- IV. WBC needs to identify scope within current housing stock for greater utilisation e.g. sole occupancy of family-sized public housing.
- V. There needs to be a scenario plan showing what capacity for employment and housing supply could be available when Fiddlers Ferry closes.

2) Release of Green Belt land

The Parish Council is greatly concerned about the scale of the proposals to build upon Green Belt land and strongly believes this needs to be further investigated, particularly given that there is no evidence that entities such as CPRE were consulted in developing the Local Plan.

- I. What is the likely food production output over the next 20 years of the Green Belt land that WBC propose to release?
- II. Has WBC consulted with bodies such as CPRE regarding its Green Belt plans?
- III. The PC understands that owners of Green Belt land would be paid 10 times its current value to release it for development – why is this premium so high?
- IV. The PC accepts that some of the land recommended for release has been earmarked for development for many years as part of the former New Town Development Plans and would like to know how many hectares fall into this category and where they are located?
- V. How much of the residual green belt land in the proposed suburb area is owned by HCA?

3) Infrastructure and Transport

The research into the impact upon infrastructure and transport is wholly inadequate and fails to show that the proposals outlined would work in practice. Nor do the proposals offer to resolve known existing problems in our community.

- I. The transport proposals in the PDO have not been fully evaluated nor do they take into consideration the compound impacts of developments in neighbouring Local Authorities. The models need to be reassessed and fully evaluated.
- II. The transport plans do not include any provision for modern, future based public transport systems e.g. trams or light rail. Given there is no existing rail services in South Warrington this is a major omission.
- III. The proposed new relief road structure looks to be inadequate & seems to assume an unlimited capacity on the M6 and M56 which is not the case.
- IV. Any proposals for a new roads infrastructure in Stretton **must include** a solution for the A559 problems in Lower Stretton.
- V. The plan assumes that the Western Link road will be in place, what happens if this does not go ahead?
- VI. There is no proposal in the plan to manage additional traffic volumes of nearby B roads e.g. B5356 between Stretton and Hatton.
- VII. What impact would the proposed new infrastructure have upon air quality / pollution levels in Warrington and in South Warrington in particular?
- VIII. No commitment should be made to any new infrastructure in the garden suburb until the future of Fiddlers Ferry is known.
- IX. The requirement for additional high level crossing(s) of the Ship Canal is **essential and not optional**.
- X. There needs to be a medical hub (similar to the Jubilee hub) in South Warrington.

4) Protection & Enhancement of Existing Facilities

The Parish Council remains concerned that the Local Plan does not take into account the following pertinent factors.

- I. Any future developments must include provision for the protection & enhancement of existing village centres and facilities.

- II. The PDO contains conflicting information regarding housing density in the suburb.
- III. The PC does not wish to see high levels of density e.g. above 25 per hectare but fervently wishes to minimise the use of Green Belt land. This requires imaginative mix of housing stock that is not demonstrated in the PDO.
- IV. There is little or no mention of the provision of areas suitable for the needs of different age groups e.g. elderly persons' communities close to village facilities etc.
- V. The PC would not wish to see any more 3 storey houses built in Stretton.
- VI. New retail units, neighbourhood hubs should be built around or upon the existing facilities to avoid the use of Green Belt areas and avoid unnecessary costs - we do not need new villages in South Warrington.
- VII. Enhanced village facilities would reduce the demands being placed on Stockton Heath.

5) Review Process

The Parish Council would like to record the following comments.

- I. The Plan covers a 20-year period and circumstances will change over time so there needs to be a formal review of all key assumptions, forecasts and models undertaken at regular intervals throughout the period.
- II. Similarly, before any decisions are made to create a new infrastructure in Green Belt areas WBC must ensure that any new brown field sites have not become available. This applies particularly in the case of Fiddlers Ferry.
- III. The outcome of these reviews should be used to update the Local Plan as required.

In summary, Stretton Parish Council **STRONGLY OBJECT** to Warrington Borough Council's Local Plan and PDO and request that the Council undertake further key research in the areas detailed above before considering a revised Plan.

The Parish Council would request that the Council acknowledge our objection and where appropriate, provide a response to the points or questions raised.

Yours sincerely

Mrs Linda Jones
Chair, Stretton Parish Council