



HOUSE OF COMMONS

LONDON SW1A 0AA

Professor Steven Broomhead
Chief Executive
Warrington Borough Council
Town Hall
Sankey Street
Warrington
WA1 1UH

29th September 2017

Dear Steven,

Warrington Borough Council
Local Plan Preferred Development Option
Regulation 18 Consultation

I am writing as the Member of Parliament for Warrington South to respond to the consultation on Warrington Borough Council's Preferred Development Option.

I have outlined below the points that I would like to ensure are considered at this stage of the consultation process.

Local residents should have access to good quality jobs, high quality housing, including social housing and homes for first time buyers, and a good standard of living. But, like many local people, I believe our Green Belt and where possible green open spaces, should be protected from development. Likewise, I and local residents want to see real workable solutions to our transport problems. In particular we want solutions that will tackle the real and inherent problems our town faces with congestion and poor air quality.

Since the launch of the consultation in July, I have met many constituents and listened to their views on the Preferred Option. There is a great deal of uncertainty, anxiety and anger over the proposals. There is particular anger over proposals that could see significant parts of the existing Green Belt designated for development. I share my constituent's concerns on this.

The challenge for Warrington Borough Council is to develop proposals that will:

- 1) encourage the efficient use of land;
- 2) protect our Green Belt/green open spaces;
- 3) promote the regeneration of brownfield sites.

These three principles should form the building blocks upon which the Local Plan is constructed.

The Council has to get the balance between these three principles right. If it does not, the adverse impact of an unbalanced Local Plan will be felt for years to come.

Member of Parliament for Warrington South

Constituency Office:
1 Wilson Patten Street, Warrington, WA1 1PG
Telephone: 01925 657600

faisal.rashid.mp@parliament.uk
www.faisalrashid.com
fb.com/faisalrashidmp
twitter@faisalrashid6



The Local Plan

I understand the statutory duty placed on Warrington Borough Council to produce a 'Local Plan' that in turn will create a framework for managing the town's development up until 2037. The primary aim of the 'Local Plan' is to identify land for future housing and economic growth. If Warrington Council fails to produce a 'Local Plan' it will lose control of the planning process. The Borough will be faced with a 'free for all' approach when it comes to future planning leaving the way open for prospective developers to cherry pick at will our green spaces for new housing and commercial build.

Clearly it is both necessary and sensible to have a Local Plan that highlights where development should go. People need decent homes but they also want pleasant green spaces and the challenge is to get that balance right. That is why it is essential that any plan coming forward takes into account the views and vision of local residents for the town.

Getting the Local Plan right means that local people are not at the mercy of developers. Ultimately it gives us the town the ability to reject developments we do not want because we have a robust framework within which to determine local planning applications. This framework should meet both the current and future new housing demands and it should do so on our own terms.

Crucially decisions like this must be driven by local communities and not imposed on them. The public must play a central role in shaping the future of our town and I hope that their views and comments are listened to in this consultation.

Community engagement

I received a number of complaints from constituents about the way the consultation process was delivered.

Constituents raised concerns with me about the proposals and about the way the information about the proposals and the consultation events have been provided.

I was contacted by concerned residents who told me that due to the timing of the consultation, over the summer holidays, they were unable to attend the consultation events. Others contacted me to say that they had not received any information about the events or indeed any information about the Local Plan until late in the consultation process.

Concerns have also been raised about the fact that information was not sent to residents in all local areas likely to be affected in some way by the proposals. Other constituents tell me that they were reliant on social media for the information about the consultation process.

If this part of the consultation process on the Local Plan is to be seen to have any merit, all residents and interested parties must have been given every opportunity to view the proposals, question council officers about the proposals and then have the opportunity to make informed submissions for consideration.

Following a full and detailed consultation process council officers will have to make an objective and impartial assessment of the submissions received. They will then come forward with informed proposals for the next stage of developing the Local Plan.



I was concerned to hear the adverse comments by my constituents on the inadequacies of consultation process.

However, I was pleased that, following my request, the Council agreed to add an additional consultation event at the Park Royal in Stretton on 4th September and I attended the event for the duration. The interest in that event was very high. Following the event, constituents contacted me to tell me about the lengthy queues that formed outside the venue and how, in some cases, they could not gain entry to the event due to the numbers of people queuing to get in.

It is essential that local people have the maximum opportunity to have their say on the future of where they live, work and run businesses. Providing the information and forum in which to do this is essential. The Council's decision to extend the consultation period to 29th September was welcomed by me and I am sure by my constituents.

I still remain concerned that the consultation process and the time scale over which the consultation was run. It did not give local residents and communities the fullest opportunities to participate. I would ask that these comments be taken on board and rectified for future consultations on the remaining stages of the Local Plan development process.

Proposals to develop land in the Green Belt

The major concern about the Local Plan raised by constituents is its adverse impact on the Green Belt and the proposal to build 9,345 of the designated 24,774 new homes on Green Belt land. (p.32 Section 5.9 Table 11 consultation document). This means that 38% of the proposed new housing is designated to be built on Green Belt land. Of these 8,155 new dwellings are proposed on the Green Belt south of the Manchester Ship Canal, with 240 new dwelling in North Warrington Green Belt and 450 new dwellings in the East Warrington Green Belt.

Having met a number of my constituents and listened to their views on the draft proposals, I know that there is a great deal of anger over proposals to develop local Green Belt land. Like many of my constituents, I have real concerns about proposals which earmark substantial areas of Green Belt land for large scale development.

Proposals should be balanced, considering the needs of current and future generations of residents of our towns and cities. Plans should not drive forward development at the expense of a good quality of life for current residents.

I have real concerns about proposals that could see areas of Green Belt land in Warrington re-designated for housing and employment development. I am deeply concerned about proposals to alter the designation of areas of Green Belt land in our town. I also have concerns about the loss of green open spaces that our real community assets, much-loved by local residents.

Some steps may have already been taken by developers to recategorize the grade of some parcels of Green Belt land and I believe that this must be resisted in order that Warrington's needs can be considered as a whole and not piecemeal. Residents have raised this as a concern and further information should be provided if this has taken place.



The ever-increasing pressure for more roads, housing and airport expansions means that it is vital to protect and invest in Green Belts and green open spaces that we have.

And this is a worrying trend. CPRE tells us that:

“There is a worrying trend of increased proposals for housebuilding on the Green Belt, rising from 81,000 proposed houses in 2012 to 275,000 in 2016 to 360,000 in 2017. Planning inspectors continue to sign off significant releases of Green Belt for development around major cities despite there being ample brownfield land available: from the totals given above, proposals for 86,000 houses in the Green Belt have been signed off since 2012.”

However, Warrington need not fall into the same trap.

The five purposes of Green Belt are clear:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

There are substantial health benefits in accessing this land for recreation and leisure purposes and ultimately this land can improve quality of life for local residents. Green space is an important environmental asset for local communities, particularly in otherwise built up areas.

The loss of this land could lead to urban sprawl and countryside encroachment.

Once this land is released from the Green Belt this could set a worrying precedent for the future of other areas of our protected green space, potentially opening the floodgates for further changes to our Green Belt policy.

National planning policy on the Green Belt is very clear. This land should only be developed in the most exceptional of circumstances. It should be protected from development wherever possible. I remain unconvinced that the case has been made for the re-designation of significant parts of Warrington’s Green belt.

In October 2014 the Conservative Government updated online Planning Practice Guidance. The aim of this was to reaffirm local authorities’ abilities to:

“safeguard their local area against urban sprawl, and protect the green lungs around towns and cities”.



On whether housing and economic need overrides constraints on land use like Green Belt the Guidance states that:

“The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as green belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.”

Furthermore, the Government’s 2014 web-based Planning Practice Guidance sets out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify Green Belt development:

“Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”.

Local green spaces serve as a green lung for our town. The strength of opposition to the Preferred Option proposals to remove land from the Green Belt for development and indeed to develop green open spaces shows just how important this land is to Warrington residents.

I support a brownfield first approach to development. Within our Local Plan we have a real opportunity to think more creatively and work hard to safeguard our Green Belt. I appreciate that the Council is committed to future proofing as much of the Green Belt as possible, but by giving way on the release of Green Belt, no matter how small, this surely only makes the protection of these sites more uncertain in future.

If the availability of substantial brownfield sites like the site at Fiddlers Ferry is likely, can the Council not act to pursue and ultimately earmark these areas for future development? By doing so, this could preserve the areas of Green Belt now under consideration for development. I appreciate that the Council is under immense pressure from the Government, given significant changes to the planning process. However, I would ask that the Council makes every effort to pursue brownfield sites like this that could ultimately meet the housing need that is being imposed by central Government.

I welcome proposals that would see the revitalising of empty or neglected sites that were once home to industry and to achieve this a strategy for regeneration is essential. I encourage the Council to continue with work to ensure that these sites are developed now and not overlooked in favour of the more attractive sites that would likely be cherry picked by developers.

The decisions that are taken now on the future of our Green Belt will impact not only current residents but future generations of Warrington residents.



Government policy on the protection of the Green Belt

Government policy on protection for the Green Belt is outlined in S9 of the National Planning Policy Framework, clearly states:

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

It also makes clear that the construction of new buildings should be regarded as inappropriate for the Green Belt. I am concerned that ultimately the people who live, work, travel or take leisure in these areas could be adversely impacted.

The benefits of this land are well documented – recreational, environmental, agricultural and health and wellbeing.

“The Green Belts are a cherished asset, and they’re also extremely valuable for food production, flood prevention, climate change mitigation and much more.”

Physical inactivity is the fourth leading risk factor for global mortality (6% of deaths globally). Moreover, physical inactivity is estimated to be the main cause for approximately 21-25% of breast and colon cancers, 27% of diabetes and approximately 30% of ischemic heart disease burden (WHO, 2015).

According to the NHS Atlas of Risk (NHS Choices, 2013), in 2007, 5.4% (25,200) of all deaths in England were attributable to physical inactivity.

The use of parks and green spaces in Warrington for exercise and health reasons has been increasing. We should be looking at how we can continue with this success.

Further partnership work needs to be supported to encourage the recreational usage of green spaces, for example by achieving an outdoor based activity programme such as walking or cycling programmes. The Active Warrington Partnership now promotes recreational running and cycling projects and has introduced initiatives like Park Run to Warrington. Clearly there is an appetite locally to build on these initiatives. The benefits of doing so for health and wellbeing reasons are clear. We need to ask ourselves whether we want to pursue proposals that could see the town lose its green assets or whether we want to be a town which thinks about growth in a different way: meeting needs whilst protecting the green spaces that are so important to residents.

Green spaces also provide a longer term positive effect on life satisfaction and are good for people's wellbeing. A study published in 2013 found that living in an urban area with green spaces has a long-lasting positive impact on people's mental well-being. Researchers found that moving to a green space had a sustained positive effect:

“...on average, individuals have both lower mental distress and higher well-being when living in urban areas with more green space. Although effects at the individual level were small, the potential cumulative benefit at the community level highlights the importance of policies to protect and promote urban green spaces for wellbeing”.



According to research from the University of Washington:

“Encounters with nearby nature help alleviate mental fatigue by relaxing and restoring the mind. Within built environments parks and green spaces are settings for cognitive respite, as they encourage social interaction and de-stressing through exercise or conversation, and provide calming settings. Having quality landscaping and vegetation in and around the places where people work and study is a good investment. Both visual access and being within green space helps to restore the mind’s ability to focus. This can improve job and school performance, and help alleviate mental stress and illness.”

Green spaces offer many benefits. These areas of land are important assets and like many local people I want to see our Green Belt and, wherever possible, our green open spaces, protected from development for the benefit of future generations.

Traffic and transport concerns

Warrington’s roads are already congested and struggle to meet existing demand. I am concerned that the loss of green space and the large-scale development proposals for the constituency will exacerbate these congestion problems.

The local road and motorway network is already at the point of gridlock at peak times. If there is an incident on the surrounding motorway network local roads come to a standstill. Our local roads are already reaching breaking point. I question how sensible it is to be putting forward proposals for significant developments in this area without tackling these congestion problems first.

In addition to the current problems we have with traffic, we do not yet know what impact the tolling of the two Halton bridges will have on the volume of traffic using Warrington roads. It is a simple matter of fact that those people wishing to avoid the toll will drive through Warrington. Regardless of any memorandum of understanding, the reality is that the decision that drivers make to avoid paying a charge will have an adverse impact on our roads.

Whilst I appreciate that the proposed Warrington Western Link will provide the much needed opportunity to develop brownfield land for development in addition to a new through route, concerns have been raised that the road is first and foremost a mechanism for opening up development land and that it will itself generate further congestion due to the number of homes proposed for the site. I have already responded separately to the initial Western Link consultation on behalf of my constituents and a response to the further consultation on the preferred route will also be provided.

Concerns have also been raised with me regarding future of the Trans Pennine Trail in Latchford, Grappenhall and Thelwall. Can I ask for clarification on whether there are plans to develop this site to make way for the construction of a new road or other transport route? There is much concern about the future of the trail. It is a popular route for runners, cycling and for dog walkers. It is a diverse habitat for local wildlife. I understand that bats, butterflies, rabbits and owls can be found in this area. I would be grateful if the Council could provide an update on the future of the Trail.

Further concerns have been raised by residents with regard to the potential for severe congestion on the A49 route through Stockton Heath and Appleton/Stretton, into which considerable additional traffic will potentially be funnelled. This is a route that contains a swing bridge over the Manchester



Ship Canal and leads to the severely congested traffic system at Bridge Foot. It is already under considerable pressure without the additional population that the proposed development will generate.

As it stands, we have a strategy with development plans which will potentially change areas but with no substantial or tried and tested measures to combat the severe congestion issues we face currently face on our roads. Can our roads cope with the development of 24,774 additional homes? We simply do not know. Given this it would seem unwise to press ahead with proposals until we do understand what consequences, if any, this could have on the local and national road networks.

Concerns about poor air quality

I am concerned that significant areas of development, particularly through the development of our green spaces, could also have an impact on the health of local residents due to increased air pollution from the additional car movements.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion.

Across the UK it is predicted that poor air quality leads to 29,000 premature deaths from exposure to particulate pollution, and an additional 11,000 from exposure to nitrogen dioxide.

For Warrington, 4.8% of all mortality is attributable to man-made particulate pollution, which is equal to 95 associated deaths. This is slightly worse than the average for the north west of 4.6%.

According to the Royal College of Physicians and Royal College of Paediatrics and Child Health, outdoor air pollution is responsible for the equivalent of 40,000 premature deaths a year in the UK.

Fine particle air pollution is responsible for 29,000 early deaths a year. The effect of the toxic gas nitrogen dioxide (NO₂) brings the figure up to 40,000 a year.

The health problems resulting from exposure to air pollution have a high cost to people who suffer from illness, to our health services and to businesses. In the UK these costs add up to more than £20 billion every year.

In 2016 Warrington was highlighted by the World Health Organisation (WHO) for breaching air pollution safety levels. It was found that the town had breached the WHO's safe levels PM_{2.5}, which are particles of things like smoke, soot, dirt and dust found in the air. We already have problems with poor air quality. I am concerned that large scale development and an associated increase in cars, could impact on the health of residents because of the additional car movements.



The National Planning Policy Framework states that:

“To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account...”

The impact of poor air quality is significant and clearly a focus on addressing these concerns is critical. I am concerned therefore about the lack of realistic and joined up action to tackle the problems.

Pressure on local services

I have serious concerns about the impact that the proposed new housing developments could have on our local services, including on demand for school places and on GP practices.

General demand on our local medical practices and on Warrington Hospital is already high. New housing developments across my constituency are placing additional pressure on both our local GP services and our schools. The impact on these vital local services must be paramount and proposals to ensure that this pressure is relieved have to be considered as a priority.

Whilst it seems sensible to develop a strategy which outlines how and where jobs and homes will be created in future, planned growth needs to be proportionate and development should not be detrimental to the quality of life of Warrington residents.

National Planning Policy

I have serious concerns about the implications of the timing of the consultation on the PDO in Warrington. In the light of the Government's current consultation, Planning for the right homes in the right places: consultation proposals, published on 14 September, and the revised National Planning Policy Framework scheduled for Spring 2018, it may be the case that the calculation of the local housing requirement needs to be reconsidered and that the numbers on which Warrington's current consultation is based will not be appropriate.

On an even more fundamental point, the 20 year period on which Warrington's proposed Local Plan is based is not set in statute and it may be that the town's needs could be adequately met within a shorter period through the use of brownfield sites, thus preserving the current Green Belt for the benefit of residents.



In conclusion

I believe that the development of local Green Belt land is the wrong approach to take to meet the housing needs set out by Government. It is a short-sighted approach which ignores the wishes of local people.

In its current form a further 24,774 homes in our town would add a great strain to our already overstretched local infrastructure and could exacerbate local problems with poor air quality. If the projected house build over the 20 years covered by the Local Plan was to be reduced by 9,345 dwelling down to 15,429 giving an annual rate of 772 new build dwelling per year we would be able to protect the existing Green Belt from development pressures.

We need a strategy that has a clear and defining focus on regenerating our brownfield sites, which also looks to incorporate those sites coming forward in future – like the site at Fiddlers Ferry.

We need a focus on making real improvements to local public transport. We also need a concerted effort to tackle the intolerable levels of traffic congestion, with plans to achieve improvements which start now.

It makes sense to plan for growth in a balanced and sustainable way.

It is important that the right mix of housing is achieved, in particular to free existing housing stock to allow for family homes to be released. The provision of homes in the private, rented and social sectors for older people and single people is therefore essential. It is also important to ensure that there is a focus on affordability and proximity to the services that people require, and that it is accessible to their current communities. Making best use of the current housing stock will avoid the need to meet all future housing requirements through new-build schemes.

Crucially, the Plan must represent the way Warrington residents want their communities to grow. The Plan should not run counter to the wishes of residents. Local people must have a leading role in shaping the plan.

I welcome proposals that will help my constituents to access good quality jobs. However, alongside economic benefits we must ensure that residents maintain access to quality green open spaces and have improved local transport provision.

However, like many of my constituents who have contacted me about the Local Plan, I object to plans to develop on the Green Belt, I have serious concerns about proposals that would see our town lose much-loved green open spaces and I call for a rethink on the amount of housing development that has been identified.

Yours sincerely

Faisal Rashid MP

c/c: Councillor Terry O'Neill, Leader, Warrington Borough Council