

## Objection to LDP Preferred Option

I object very strongly to the preferred option for the Local Development Plan on the following grounds:

1. Housing numbers
2. Omission of large Brown Field sites
3. Inefficient use of Town Centre sites
4. Loss of Green Belt
5. Traffic and the inadequacy of the suggested highway improvements
6. Healthcare issues
7. Impact on Stockton Heath
8. Inadequate consultation

### 1. Housing numbers

The number of housing units proposed for the 20 year period of the plan is 24,220. Assuming an occupancy of 2.3 people per unit this figure implies an increase in population for the town of more than 55,700. Given that the current population is 207,700, this is equivalent to an increase of more than 26% to over 263,400. It is not credible that the town could cope with such an increase, which is totally unreasonable.

This increase is not consistent with other projections. According to Table 8 in the Mid Mersey Strategic Market Housing Assessment Update Final Report of May 2017, the projected population for Warrington in 2037 is 232,400, some 12% higher than the current figure of 207,700. The projected increase in population is therefore 24,700, which at 2.3 persons per dwelling would require an additional 10,740 housing units, less than half the 24,220 proposed. This would still be the case if a 5% contingency were to be added.

A 12% increase in population for Warrington is also in line with the projected growth in population of the UK as a whole. According to a prediction this year from the UK's Office for National Statistics, the UK population is expected to grow from the current level of 65.6 million to more than 74 million in 2039. Assuming that "more than 74 million" means 74.5 million, this implies an increase of 13½% in 22 years. Pro rata this is equivalent to 12% over 20 years.

If a figure of 12% were to be used, then Green Belt would not have to be touched anywhere in the Borough.

Higher numbers than necessary seem to have been proposed because of an obsession with growth and city status (numerous remarks in the document bear this out, see Appendix).

Even if city status is wanted (a vanity project if there ever was one), a population of well over a quarter of a million is not required. Chelmsford was awarded city status in the last round and its population at present (including villages in the Borough) is about 172,000.

### 2. Omission of large Brown Field sites

The site at Fiddler's Ferry Power Station is not included; this power plant will certainly close down long before the end of the plan period because of the phase-out of coal. Fiddler's

Ferry's sister plant at Didcot has already been shut down and demolished. A new power plant on the site at Fiddler's Ferry operating on gas or biomass would have a far smaller footprint than the current power station, leaving a huge Brown Field area for development.

The Warrington General Hospital site will become available during the plan period because the need for a new site has already been made public.

### **3. Inefficient use of Town Centre sites**

Surplus retail premises in the Town Centre have been ignored, for example, the former buildings for Boots in Bridge Street and TJHughes in Sankey Street, both of which have been vacant for years. It is clear that retail activity has been both shrinking and moving in the direction of Golden Square, leaving empty property elsewhere in the Town Centre. This property should be reused for residential purposes.

A uniform housing density of 30/hectare has been assumed throughout the town. Higher housing densities, perhaps 40/hectare, would be possible for flats in the Town Centre, which would reduce the demand for land, especially Green Belt, elsewhere.

Housing close to railway stations and the bus interchange would also reduce the dependency on car travel.

### **4. Loss of Green Belt**

There are no exceptional circumstances for building on the Green Belt; desire for city status does not represent an exceptional circumstance and neither does an ambitious target for economic growth. The Green Belt does not need to be touched with a lower housing number, increased housing densities in the Town Centre and more efficient use of redundant buildings and Brown Field sites.

There is a gross unfairness in the allocation of Green Belt land: 93% of housing proposed in the Green Belt is south of the Manchester Ship Canal with only 7% north of the MSC.

With the proposed South West Extension the gap between Warrington and Halton would disappear because of development in the Green Belt in Walton.

Warrington's best countryside would be lost, a disadvantage for all Warrington residents. There would not be a single field left in Appleton east of the A49, there would not be a single field left in Walton west of Chester Road. This would be a complete desecration of this countryside. Existing residents would want to leave the town and the area would no longer be attractive to new-comers.

No environmental survey or ecological survey has been carried out about the effects of the loss of Green Belt land.

There would be a loss of good agricultural land, which could be vital after Brexit.

## 5. Traffic and inadequacy of the suggested highway improvements

When the Warrington and Runcorn New Town Development Corporation published their proposals in the 1970s, their comprehensive highway infrastructure included, among other things, an expressway all the way from the M56 at Stretton to the M62 at what is now Birchwood. This expressway had a high level crossing of the Manchester Ship Canal and it had links to other primary routes such as the M6 and the A49 north. At that time a lower total of housing was proposed for south Warrington and car ownership and usage then was much lower.

In contrast, Figure 10 in the LDP document, “Preferred Development Option – Transport Infrastructure” has a few vague red lines on a map, showing ideas for possible additional highway infrastructure. This is an insult to the readers’ intelligence. There is no indication about how new roads would be connected to the existing network and no evidence that such roads would be feasible.

Major developments are proposed in locations where there is already severe traffic congestion. For example, the SE development is adjacent to the Lymm M6 junction, the Stretton M56 junction and Lumb Brook Bridge, all of which are subject to severe congestion. The SE development is adjacent to Chester Road. Chester Road regularly has tail-backs for miles.

In any case, it is senseless to plan settlements remote from the town centre and then expect residents in them to use sustainable transport options and not cars. This has already been shown in various locations. For example, when there was a regular bus service to Grappenhall Heys, it simply was not used.

In numerical terms, 9000 additional house in south Warrington (Grappenhall, Appleton, Stretton and Walton) would mean more than 20,000 additional cars on the network in this area. All of the developments would be remote from the Town Centre and one would have to assume one car per adult.

No traffic modelling at all has been conducted for the additional cars on the road network. The Council’s Highways Engineers are quite frankly delusional if they think that the current road network, with a few minor amendments, can cope with the traffic generated by the proposed developments. The network is already over capacity and gridlock occurs whenever there is a serious incident on one of the motorways surrounding Warrington or a problem on the Runcorn Bridge. One does not even have to do traffic modelling to understand that the highway network in south Warrington could not possibly cope with another 20,000 cars.

Given the extreme constraints posed by Warrington’s geographical position, with limited crossings of the River Mersey and the Manchester Ship Canal, the Council should be arguing with central government for the lowest possible housing number, not pursuing a high number on the basis of a transition to city status or ambitious growth. If the Council does not work to minimise housing numbers, it will be letting down the existing residents in the town.

## Healthcare issues

24,220 houses and flats means a huge population increase of more than a quarter. Could the hospital cope with such an increase? Could primary care and dental services be provided for so many extra patients?

### 6. Impact on Stockton Heath

One has to assume that most of the new residents in the SE and SW developments would prefer to use Stockton Heath as their local centre. This would mean even more severe congestion in traffic through the village, which is already routine during the day and not just at peak times. The outcome would be a change in behaviour, with residents new and old in south Warrington turning their back on the Town Centre and Stockton Heath and heading towards other destinations for shopping and leisure activities. Parking problems in Stockton Heath would also be exacerbated.

### 7. Inadequate consultation

With the introduction of green bin charges every household was notified by a leaflet. This should have been done for the Local Development Plan preferred option, especially in those districts most affected, and in particular because the consultation took place during the holiday period. Some residents in affected areas were unaware of the LDP a month after the consultation started.

No other options were given in detail in the document; readers were merely informed that they had been rejected. This was not acceptable.

## Conclusions

The LDP represents an assault on the countryside and the wellbeing of residents in the south of the town for no reason other than a grandiose plan for city status and a desire for over-ambitious economic growth. The proposed housing figure cannot be justified from a reasonable population increase, and would, I think, be subject to legal challenge. Such an increase would lead to parts of the town being destroyed for ever.

The implementation of the preferred option for the Local Development plan would desecrate south Warrington, discouraging people from moving here and encouraging existing residents to leave.

No transportation study has been carried out as to whether the road network could possibly cope with the additional traffic generated by the extra housing. It is almost certain that roads in south Warrington, even with the few suggested amendments, could not possibly be viable with 20,000 or more extra cars from the additional 9,100 houses in Grappenhall, Appleton, Stretton and Walton. As such, the whole plan is not feasible.

In view of the constraints to road travel posed by the limited crossings of the River Mersey and the Manchester Ship Canal, the Council should be arguing for the minimum possible number for housing starts. If it does not do so, it will be a grave dereliction of its duty to serve local residents.

If a realistic housing figure were to be adopted and Brown Field sites and the Town Centre were utilised efficiently, there would in fact be no need to touch the Green Belt anywhere in the town, north or south. This should be the aim of the Local Plan.

As such, the proposed Local Development Plan should be rejected.

### **Appendix References in the Document to City Status and Growth**

Paragraph 2.20, page 7

“Warrington has significant ambitions for economic growth”

Paragraph 4.5, page 13

“the Council has taken the decision to plan for a level of growth in accordance with the LEP’s Strategic Economic Plan, over and above the baseline economic jobs forecasts for Warrington.”

Paragraph 4.6, page 13

“The Council believes planning for this level of growth provides a unique opportunity for Warrington to make the transition from a New Town into a New City.”

Paragraph 4.17, page 15

“Despite maximising the capacity of the existing urban area, it is apparent that if Warrington is to meet the development need arising from its growth aspirations, it can only do so through the release of Green Belt.”

Paragraph 5.1, page 31

“an ambitious plan for the future growth of Warrington”

