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Re: Preferred Development Options

I am writing to express my concern over the proposals set out in Warrington's local development plan. I fully understand the need for house-building projects and the attendant infrastructure that that requires. However, I have a number of objections to the proposed plan and feel strongly that it does not offer the most sustainable solution possible to meeting the development needs of the Borough.

My first objection is to the drivers behind the plan. This plan is led by property developers who have identified areas where they can maximize profits by building 'Executive houses in an expensive part of town which very few current residents can afford, rather than identifying Warrington's Housing needs and how best to achieve this in a strategic manner.

Economic

I challenge the 1113 per year housing number in light of the current economic environment. Adopting a lower assumption of new homes per annum could significantly reduce the amount of Green Belt Land which would be needed for housing.

1. Warrington's Borough Council's [2016 Air quality annual status report \[pdf\]](#) states: 'For Warrington, the population is predicted to grow on average by 10% over the next 10 years, which equates to an average of 650 new homes required to be built per year. **Why has the predicted future housing for Warrington increased significantly from 650 to 1113 houses per year on the basis of a developers appeal?**
2. I do not think it is feasible given the economic uncertainty introduced by Brexit to use historic growth rates to forecast housing need and economic growth. The stalling of the Northern Powerhouse initiative and the associated devolution, also suggest a more conservative approach should be adopted.

The plan does not give sufficient justification as to why such large amounts of greenbelt should be freed up for employment.

1. The out of town location of greenbelt would favour distribution centers renowned for offering low level and low grade employment and does not meet the need to create jobs in the town center. The people employed in these areas are unlikely to afford to live near to their place of employment, thereby contributing to further traffic movements. Therefore this is not consistent with Strategic Objective W4 of the plan 'reducing the need to travel', thus the plan is not consistent with its own objectives
2. There are distribution/warehousing units currently empty in Warrington, for example Centre Parks, Dallam Lane, sites which have had long term vacancies. The plan must justify the need for further distribution and commercial development, citing the historic and current occupancy rates.
3. There are also many office units currently vacant for example long term empty units on Centre Parks. The plan should justify why town center brownfield sites are being used to create more commercial units rather than for the provision of housing.

Objective W1 of the plan is given as enabling the transition of Warrington from New Town to New City. Were Warrington to change status from a town to a city it would change from a large town bordered by two of the countries principal cities (Liverpool and Manchester) and two of the country's main metropolitan areas (Greater Manchester and Merseyside) to a small city lying in the same geographic position. No explanation is given in the plan of the benefits associated with the gain of City status. Neither is it explained what a 'New City' is, and how it differs from other existing cities. The term 'New City' needs to be defined in detail and an explanation given of how it differs from a normal 'City'.

Environment

Significant loss of Green Belt Land

I do not feel sufficient justification is provided as to why such a large proportion of South Warrington's greenbelt must be developed. Paragraph 83 of The National Planning Policy Framework indicates that established Green Belt boundaries should only be altered in "exceptional circumstances". WBC indicated on page 15 that they believe that these are exceptional circumstances, but no justifications is provided. I strongly feel that the proposal of such a large development on Greenbelt must be backed up with a clear explanation of what the exception circumstances are, together with strong evidence proving that they are valid.

The plan fails to take into account the Natural capital of the Greenbelt:

- Agricultural value

- recreation & activity thereby contributing to the health and wellbeing of the community,
- providing a habitat for wildlife (included protected species such as bats),
- air quality
- flood risk management particularly surface water flooding). Areas of South Warrington already experience surface water flooding – Areas around the A50 have experienced surface water flooding, for example Church Lane in Grappenhall Village, and building on Greenbelt in this area will exacerbate this problem).

Strategic objective W2 of the plan is to ‘facilitate the sensitive release of Green Belt land’. Under the section ‘Exceptional Circumstances for releasing Green Belt’ (part 4.40) the plan states ‘When considered as part of these strategic objectives, exceptional circumstances can be demonstrated to justify the release of Green Belt’. Therefore the release of Green Belt is one of the Strategic objectives of the plan, and the Strategic objectives of the plan are one of the exceptional circumstances justifying the release of Green Belt. This is a circular argument and is not valid.

Transport:

In May 2016, the World Health Organisation reported that Warrington is the second worst town / city in the North West for breaching safe levels of air pollution (behind Salford).

A high level traffic survey has not been included in the PDO. In the 2011 Census, 81% of Warrington households had access to at least one car / van with 39% having access to two or more cars / vans. Nationally, just over a quarter (26%) of households had no access to a car / van which was a considerably higher proportion than in Warrington (19%) indicating higher than average levels of car ownership in Warrington. The Transport Summary, completed by AECOM in April 2017 notes that there is falling bus patronage throughout the borough and concedes that there are several congestion hotspots. This evidence suggests that creating 24,000 households in Warrington will introduce a large number of additional vehicles on to the roads with little uptake of public transport which will exacerbate two problems:

1. The air quality which is already poor will further deteriorate– this will affect all Warrington residents, not just those living closest to the new housing developments. The local plan strategic objectives fail to include improvement of Air Quality .
2. Warrington Borough Council are completing baseline traffic modelling at the time of the consultation so we do not know if the transport infrastructure can support the current car owning population, let alone meet the additional demand introduced as a consequence of the plan. However, it is certain that in the current scenario introduction of up to 50,000 extra vehicles will exacerbate congestion in the town and have negative economic benefits with people avoiding the town centre.

The Transport Summary, completed by AECOM in April 2017 cites increasing rail patronage as a ‘strength’ and the new Warrington West train station which would support greater levels of residential and commercial development as an ‘opportunity’. Location of such large developments to the South of Warrington conflicts with the findings of this document;

1. the south of Warrington is not served by the rail network therefore the potential for increasing rail use will be limited
2. The are no proposed sites in West Warrington therefore failing to capitalise on the public transport and connectivity benefits of the new rail station. I think further consideration needs to be given to the potential use of the Fiddlers Ferry brownfield site which is better placed to optimise use of the rail network.

There is no detailed transportation/ traffic chapter and I object to the delay in consideration of transport in the plan. I am concerned that the developments will be completed before any transport infrastructure improvements are considered. Traffic modelling must consider the existing physical capacity of the roads as the basis for establishing how much development can be supported. Additional development above this must then be accompanied by a clearly defined transport solution, and one which should be provided by the developers as part of planning gain as I am concerned about the inability of Central Government to provide funds. To re-iterate, transportation and infrastructure must be at the forefront of the plan and not an after thought, otherwise the new residents of Warrington will merely be adding to the traffic congestion at pinch points such as Latchford and Stockton Heath, which will act as a deterrent for anyone from the south of the town visiting the Town Centre which will become even more of a ghost centre – and after all isn’t the basis of this plan all about giving us a fabulous ‘City Centre’!

I would also caution against the use of inappropriate assumptions in the traffic modelling – at a consultation evening one of your transport officers referred to increasing uptake of electric cars, I challenged him on this point and came away concerned that unfeasible assumptions would be made in the transport modelling in order to make the proposed Garden Village Suburb work.

I object IN ADVANCE to any potential transport solutions that adversely impact on the Trans Pennine Trail. The TPT is a multi-user route of NATIONAL importance, used not only by locals for recreation and utilitarian cycling/commuting, but also by a large number of visitors including organized charity running and cycling events. The answer to Warrington's traffic congestion lies in improving the public transport network and provision of cycling facilities, and losing the TPT for a new road crossing would make a mockery of any sustainable transport plans the Borough Council proposed.

In summary I suggest the development of the plan should be structured as follows.

- **Develop a borough wide air quality model, model to be calibrated and validated to industry standards**
- **Determine what reductions in transport emissions are required to improve air quality within the borough such that it meets the required standards**
- **Determine what reductions or modal shifts in motor vehicle use in the borough are required to produce these emission reductions.**
- **Produce a local development plan designed to achieve these reductions or modal shifts in motor vehicle use**

Social

The proposed Green Belt locations, in particular the Garden City Suburb, are NOT the most suitable location for affordable housing. Housing in South Warrington is some of the most expensive in the Borough, and any developer will seek to maximize their profit by building large family houses (typically four bed) that are in-keeping with the existing styles. These houses will only be financially available to a small number of people. The LDP should look for opportunities to maximize provision of affordable housing in the town center, focusing on brownfield sites rather than greenbelt land. Improved utilization of the brownfield sites would also ensure the additional population are located within easy access of the Town Centre and help to mitigate against any exacerbation of Warrington's current congested transport network, and consequent poor air quality.

The proposals in the plan display inequality in how villages within the borough are treated. Section 4.48 states that settlement profiles ruled out the possibility of doubling the size of Lymm and Culcheth as settlement extensions of this scale were considered unreasonable due to the poor performance against Plan objectives, in particular due to the scale of impact on the character of the existing settlements. Why is it not considered detrimental to build 6000 houses around the villages of Appleton Thorn and Grappethall - this will more than double the size of the villages and join them with the main urban area? I would consider this to be very detrimental to their character.

The plan should show greater social equality with the developments split over more areas rather than just focussing on south Warrington. In particular I think greater consideration should be given to the potential of the Fiddlers Ferry site, this is a brownfield site which is much better placed to use the rail network, including the new Warrington West station which is more in-keeping with the significant east-west connectivity that is noted in the AECOM 2017 Transport Summary.