

[REDACTED]
Warrington,
[REDACTED]

16 June 2019

Local Plan,
Planning Policy and Programmes,
Warrington Borough Council,
New Town House,
Buttermarket Street,
Warrington,
WA1 2NH

Dear Sir,

RE: WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN (March 2019)

In response to your consultation on the Proposed Submission Version of the Local Plan I have prepared a number of representations which are detailed on the following pages.

I have lived in [REDACTED] years and during this time I have worked in the following locations:

[REDACTED]
[REDACTED] Consequently I have witnessed the development of Warrington and have experience on how new development has affected South Warrington. Traffic congestion during peak times has significantly increased and I would assume that air quality has deteriorated as a result.

Yours faithfully,

[REDACTED]

Adrian McQuillan
Tel. [REDACTED]
[REDACTED]

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1. REPRESENTATIONS

1.1 General

Paragraph 1.1.8 Of the Local Plan states: “Legislation requires that plans are “sound” and one of the four tests of soundness set out in the NPPF is that plans are consistent with national policy. The other tests are soundness are that the Plan is:

- *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs;*
- *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; and*
- *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters.”*

1.1.1 Positively prepared

The Local Plan seems to have been positively prepared.

1.1.2 Justified

A reasonable alternative should have included plans based on lower economic growth aspirations.

1.1.3 Effective

The ambitious house building targets, which are significantly higher than what has been achieved in the past, bring into question the deliverability of the plan.

Lack of detail on transport infrastructure casts doubt on the ability to deliver the plan without increasing congestion and pollution. See below for specific concerns.

1.2 Economic growth target

It is evident from the Local Housing Needs Assessment prepared by GL Hearn that the forecasting of economic growth has a high level of uncertainty as demonstrated by the variations in predictions from different organisations. There is further uncertainty on how growth in the number of jobs translates into housing need.

I am concerned that an over-optimistic economic growth forecast has resulted in excessively high house building targets.

1.3 Transport

I have reviewed the Local Plan in conjunction with the Warrington’s fourth Local Transport Plan (LTP4 March 2019) and have very serious doubts about the ability to achieve:

- the vision in section 3.1.2 of the Local Plan: “2. *Warrington’s growth will be positively planned to ensure that new homes, jobs and businesses are supported by major improvements to the Borough’s infrastructure, to the benefit of existing and new communities alike.*”
- the objectives in section 3.2.3 of the Local Plan: “W4 *To provide new infrastructure and services to support Warrington’s growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.*”

My concerns include:

1.3.1 Warrington Multi Modal Transport Model 2016 (WMMTM16)

The Warrington Multi Modal Transport Model 2016 (WMMTM16) has been used as justification for stating that the proposed new development can be accommodated subject to a number of infrastructure improvements. In fact, the Responding to Representations Report quotes the following in response to concerns raised during the previous consultation:

“The Council’s Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington’s transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.

The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council’s Infrastructure Delivery Plan (IDP).

The Council’s Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.”

It is evident from Warrington Local Plan Testing (13 March 2019) that there will be a significant detrimental impact on travel time unless a Mass Transit system and “Go Dutch” cycling scheme are introduced.

My concerns are:

- The year 2016 has been used as a base, so scenarios have been modelled to see if they are worse than this, but I would argue that congestion levels in certain places at certain times of day were not acceptable in 2016.
- The Mass Transit system may never be implemented and we will suffer worse congestion.
- The modelling has not considered the consequences of increased use of the Manchester Ship Canal.

1.3.2 Access to Warrington Town Centre from the South

Access to the Town Centre is very congested during peak times. An increase in the number of residents in South Warrington, as proposed, can only make this worse.

1.3.3 Increased use of Manchester Ship Canal

The justification for the expansion of Port Warrington is the increased use of the Manchester Ship Canal. An increase in use of the Manchester Ship Canal will cause more congestion in Warrington due to the disruption to traffic when the swing bridges operate.

1.3.4 Current congestion

██████████ Stockton Heath I find traffic congestion is already unacceptable at particular times of day at the following locations:

- Chester Road alongside the River Mersey. It often tails back up the dual carriageway from the Town Centre, a distance of over 1 mile.
- London Road though Stockton Heath.
- Junction at Lumb Brook.
- A49 at the Cat and Lion with a queue often in excess of 15 minutes.
- M6 Thelwall Viaduct - queuing to get onto the motorway at Junction 20.
- Junction of M56 and M6.

All of these will be adversely impacted by proposed new developments.

1.3.5 Motorway Network

Warrington is bordered by 3 major motorways, including the notorious Thelwall Viaduct on the the M6. All of these motorways suffer congestion and delays at peak times which impacts traffic

in Warrington. The proposed new developments will result in more traffic on the motorway network with a knock-on adverse effect on the traffic in Warrington. The proposed plan for the employment area of the Garden Suburb will positively encourage more traffic onto the motorway network with the growth of warehousing and logistics.

1.4 Loss of Green Belt

The scale of the proposed development will totally change the character of South Warrington and seems to go against the aims of Green Belt by:

- contributing to the sprawl of large built-up areas
- engulfing what are currently distinct villages
- sacrificing countryside

I am not convinced that there are exceptional circumstances that justify the proposed loss of Green Belt, particularly if the scale of the proposed development is the consequence of an over-optimistic economic growth forecast.

1.5 Warrington Garden Suburb

1.5.1 Access to Town Centre

There is no provision for improved access to the Town Centre or other Employment Areas (10.2.11) as the only available routes are all heavily congested. [REDACTED] Great Sankey and the journey from Stockton Heath is very unpredictable due to congestion and swing bridge operation. This will get worse if residents of the Garden Suburb have employment in the Town Centre or other Employment Areas in Warrington.

I would disagree with the assertion in 10.2.26 that the location of the Garden Suburb will ensure good access to the Town Centre.

1.5.2 Easing of congestion

It is unclear how the new strategic link connecting the A49 to the A50 will ease congestion across the wider south Warrington area (10.2.12) as congestion tends to occur at busy junctions with traffic lights or approaches to motorway junctions.

1.5.3 Green Belt protection

I do not see how setting the boundaries (10.2.14) will ensure the permanence of the Green Belt. If the Green Belt is sacrificed for the proposed Garden Suburb there is nothing to stop further sacrifice of Green Belt beyond the M56 and A50.

1.5.4 Increased traffic

There is recognition that the employment area (10.2.19) will lead to an increase in traffic but there is no mention of the increase in pollution and mitigation measures for the environmental impact.

1.5.5 Community infrastructure

The provision of infrastructure (10.2.20) alone is not sufficient. The services need to be operational early in the phasing of the development which would require the recruitment of professionals such as doctors, dentists, teachers, etc. If the services are not operational an intolerable burden would be placed on existing services, for example, making it increasingly difficult to make an appointment with a GP.

1.5.6 Bridgewater Canal towpath

Currently it is prohibited to cycle on sections of the Bridgewater Canal towpath so Policy MD2 number 58 would not be possible without agreement with the owners (Peel Group). In my opinion, the towpath is not wide enough to safely accommodate cyclists and pedestrians.

1.5.7 Noise and air quality

The most effective mitigation against exposing people to noise and air pollution (MD2 number 66) is to increase the distance from the source. The motorways are only going to get busier and hence more polluting so it does not seem sensible to remove the buffer provided by the existing Green Belt.

1.6 South West Urban Extension

1.6.1 Community infrastructure

The provision of infrastructure (10.3.8) alone is not sufficient. The services need to be operational early in the phasing of the development which would require the recruitment of professionals such as doctors, dentists, teachers, etc. If the services are not operational an intolerable burden would be placed on existing services, for example, making it increasingly difficult to make an appointment with a GP.

1.6.2 Bridgewater Canal towpath

Currently it is prohibited to cycle on sections of the Bridgewater Canal towpath so Policy MD3 number 37 would not be possible without agreement with the owners (Peel Group). In my opinion, the towpath is not wide enough to safely accommodate cyclists and pedestrians.