



Dear Sir/Madam

We are writing on behalf of Weaste Lane Area Residents Association to strongly object to the PSV Local Plan. We believe that this plan is unsound because it has not demonstrated its deliverability or justified the proposed housing numbers. In addition, we do not believe the plan has demonstrated the exceptional circumstances required to release Greenbelt.

Greenbelt

We believe that the plan has a number of flaws related to its arguments to release greenbelt. The Greenbelt assessment for the plan is weak and appears to be steered by landowner and developer aspirations—much of the land to be released is successfully used for agricultural or dairy farming.

We feel production of local produce should be encouraged to retain jobs, skills and reduce unnecessary transport costs and pollution associated with sourcing produce from other UK areas / abroad.

The environmental and ecological impact of the loss of Greenbelt will be massive. This least sustainable form of development swallows up farmland and wildlife habitats while increasing air pollution, flood risk and car dependency. There are a number of historic trees and pond areas in the planned Greenbelt area to be used, the value of these to the local area has been undervalued.

The proposed Garden Village will merge a number of historic settlements resulting in Urban sprawl and destroying the specialist character of these unique villages.

The use of Greenbelt for so much of the housing in the South of the town before using all available brownfield sites (including now Fiddlers Ferry) does not justify the release of Greenbelt.

Housing

There is no justification for the predicted growth in housing needs that the Council suggest. The Government figure is 909 per year, however Warrington Borough Council have decided to increase this to 1,039 per year (including 10% uplift) plus set aside greenbelt for houses for a further 10 years (ie removing greenbelt now for housing for a 30 year period).

The Residents' Association feel that both the government and Warrington's even higher figure are too high and over ambitious. Warrington has never exceeded building 500 houses per year. The difference between how many houses WBC want to build and what has been achieved historically make it very unlikely that the plan is deliverable.

We do not believe that 30% is a sufficiently high number of affordable housing. Building more expensive and therefore large homes will only use up more Greenbelt unnecessarily and also simply attract higher paid earners who are most likely to commute to larger urban conurbations. This will not support sustainable economic long-term growth and makes the proposed housing numbers unjustifiable.

Economic Growth

We believe a local plan should be based on a meaningful economic strategy for the town, currently this is limited to promoting warehousing and logistics, which are/will be automated in the future.

We note that all economic growth projections for Warrington in the plan are based on the figures from third parties i.e. Warrington and Co, Developers, Local Businesses, the plan to expand the port etc.

All of these figures appear to be based on the company targets for increased earnings and have had no ratification as to whether they are realistic or not. For this reason we believe the projected economic growth in the plan is unrealistic and unsound.

Uncertainty around BREXIT makes it impossible to forecast economic growth and the proposed release of Greenbelt for employment with so little certainty about future need is not justified.

We feel that the Plan's employment proposals are unambitious. Omega and the plan for Six-56 and Stobarts have presented Logistics as a well paid career yet many employed at Omega for the likes of Amazon are on zero hour contracts or low wage jobs and nothing near the claimed average salary in Logistics of £27K.

We do not believe the town requires further massive logistic/transport hubs, which would be the second largest in the country and would result in unrelenting additional traffic (to our already saturated road network) and further pollute Warrington's inadequate air quality.

There is no economic plan to justify such large scale expansion of the town.

Infrastructure

There is no proper timescale or explanation about the infrastructure required for the proposed developments including schools and health facilities. There is also no information about how these will be funded. The plan is therefore unsound.

We feel there is little detail in the accompanying Transport Plan 4 which fails to demonstrate how the vast scale of development in the Garden suburb can be serviced thereby avoiding serious deterioration for the existing communities. This lack of information also makes the plan unsound.

LPT4 lacks important detail to allow us to make truly informed judgments. Much of LTP4 appears to be an aspirational wish list and no timescales whatsoever are offered regarding delivery. The suggestion that large-scale development in the South of Warrington will go ahead without the necessary transport infrastructure will be in place is unsound.

The plan also fails to put forward a credible strategy about how existing congestion will be resolved and is therefore unsound. The proposed Western Link has not been designed to resolve current gridlock and the continued reliance on the existing number of crossings of the Ship Canal will remain. For this reason the plan is unsound.

The plans appear to have put forward no coherent strategy for managing any adverse effects from increased HGV movements, including those that would result from the enhancement of Port Warrington, proposed Six/56 employment Park, proposed Stobart's national distribution centre, and Warrington Business Park developments etc.

There is no rail or water access to either of the Six/56 and Stobart's, which will inevitably strengthen the focus of freight movement exclusively upon road vehicles. Both schemes contravene the Council's and Government policy in regard to supporting rail freight and sustainable use of existing waterways i.e. Manchester Ship Canal.

For these reasons we feel WBC has failed to justify the level of development in the plan.

Air Quality

The World Health Organisation says that Warrington had the worst rate of small particulates in the UK for PM2.5 in 2018. The town is already overly reliant upon cars to move its population around and to and from the town. Being encircled by the M6, M56 and M62 results in frequent gridlock resulting in very poor air quality. The council itself stated in its Air Quality Plan that In Warrington in 2013, 4.8% of all deaths were caused by man-made particulate pollution in our air, which is equal to 95 unnecessary deaths a year. This is only likely to get worse.

We note that in 2013 cars in Warrington accounted for 90% of distance driven whilst contributing 61% of NOx whilst buses despite only accounted for 1% of distance travelled & contributed 11% of NOx.

The anticipated 15K extra HGV movements per 24 hours and 20K + car journeys per day linked to housing are highly likely to increase the pressure on local NHS services due to poorer air quality. We do not believe that the reliance upon logistics and such large numbers of houses, which will generate significant extra congestion and reduction of air quality is sustainable or sound. Government policy is moving towards reducing the impact of vehicles on our environment, WBC's transport and local plans are totally reliant on increasing vehicle use and are therefore unjustified and unsustainable.

The Greenbelt to the South of the town, is currently all green space and much of it high grade agricultural land. It is an important contributor to improving our air quality. It's almost total removal for employment land and housing is unjustified as its loss will negatively impact on our air quality.

Summary The Local Plan is unsound as it has proposed the building of housing numbers that do not reflect realistic population projections and rely upon an unrealistic delivery

expectation of construction which is considerably higher than the town has ever previously achieved.

The details about funding for roads and other infrastructure are insufficient in the plan and unrealistically linked to the need for developers to fund them in advance of houses being built. This is unsound.

The plan has failed to demonstrate any exceptional circumstances for the release of Greenbelt.

The plan's over reliance upon logistics and HGVs, failure to resolve the bottle necks of crossings over the Manchester Ship Canal and proposed construction of houses away from the town centre that will continue to drive increased air pollution is unjustified.

We believe both the Local Plan and Transport Plan are unsound, undeliverable and not fit for purpose and so WBC should review and amend their plan.

Yours faithfully

Weaste Lane Area Residents Association