

## Warrington Borough Council

### Warrington Local Development Plan – Proposed Submission Version

Dear Sirs

I have set out below, my comments on the Submission Version of the Local Development Plan.

I am a local resident: [REDACTED]

Email: [REDACTED]

Many of my comments relate to the South Warrington elements of the plan, [REDACTED]  
[REDACTED]

#### Objective 1

The UK is currently experiencing an unpredictable period of change. The development plans LDP needs to be seen within the context of; Brexit, with its likely medium-term implications for economic growth; changes in migration to/from Europe; the Government's policy on immigration control; climate change and the policies which relate to it including the new 2050 target for zero carbon emissions. Given the uncertainty, it would seem to me, to **be unsound to plan for the proposed 20 year plan and would be more realistic to remain within the required 15 year planning time frame.**

The national planning policy, sets a context for LDPs which includes a 15 year projection, housing expectation and a commitment to economic growth. Although a local authority needs to acknowledge this context within its Plan, there is merit in challenging any assumptions in that policy which are at odds with the views of the local population.

I come across a commonly held (although admittedly unquantified) view in Warrington that the town is currently a good size at 200,000 population and that the notion of unlimited growth is not necessarily to be welcomed. As a designated "New Town", Warrington has experienced considerable expansion in past decades. The arguments for increased economic growth have been a national assumption for decades, typified by the adherence to GDP as a central measure of prosperity. This economic growth is naturally accompanied by population growth (notably including immigration), together with increased housing to accommodate it and the growth of businesses to support it. There are downsides to this growth which are being increasingly recognised, including urban sprawl, industry, pollution, traffic congestion, disappearing farmland, green and wild spaces etc. The 2014 (ONS) figures for population projection for Warrington used in the LDP, amount to a 9.9% increase over the proposed 20 year period. The corresponding figures for neighbouring local authorities (ONS 2014 data), such as Halton (3.1%), St Helens (5%), Wigan (6.4%) are much smaller. The projections for households, reflects these figures. The data for Warrington is a projection of the historical population profile but this level of growth **need not be an assumption.**

Whilst few people would object to increased personal prosperity, they may not necessarily agree that it should take place indefinitely, at the expense of the quality of their living space. It is my view that the automatic assumption about maximising (quantitative) growth over the term of the plan should be questioned. The town cannot continue to grow indefinitely. Will the same assumption be made in 2037? What is sustainable without damaging the quality of people's lives?

The Borough Council needs to re-consider its pre-occupation with economic growth. The Local Plan should firstly address the needs and well-being of the **current** population of the town, rather than focusing on expansion. There is a need for some dialogue with the population of Warrington as to how they would wish the town to develop.

The housing needs assessment undertaken as part of this plan clearly identifies unmet needs in the existing housing and projected changes in the make-up of the population, (particularly older people). Part of the unmet need, includes households living in unsuitable homes and overcrowding. It also identifies a demand among the existing population for alternative types of tenure, such as home ownership rather than living in rented property. There is clearly a need for an increase in the housing stock available to meet these requirements of the **existing population**, its organic growth and to offer the type of accommodation and tenure type desired. The housing survey attached to the LDP gives little insight into the condition of the housing stock within the town. What is the need/scope for redevelopment? Could some parts of the existing housing stock be adapted to better meet the needs of the population?

Given the existing unmet need for homes in the area, it would appear that the rate of historical housing development has been insufficient to meet demand. This puts into question the ability to meet the even greater build rate expected from this plan. Is this build plan in LDP realistic? It is my view that **the proposed build rate is unrealistic, and the plan should be deemed unsound.**

The emphasis for housing should focus on meeting the requirements for the existing unmet need and organic population growth, ideally within the boundaries of existing communities, before attempting to attract additional migration and commuting to satisfy the desire for economic expansion.

The development of housing and community centres in the proposed garden suburb, given its location, is likely to attract people who will live in the area but commute to places other than Warrington, particularly if houses are available primarily on the commercial market, which will attract prices outside the reach of the many of the Warrington residents identified as in need of suitable homes.

## **Objective 2**

The Green Belt was instituted primarily to maintain the integrity of communities. Warrington has many local neighbourhoods and communities. People value and wish to retain the integrity of their local communities which are being jeopardised by the expansive corporate wishes for the Warrington entity. The number of new houses proposed will completely alter the nature of the existing area, swamping the communities in Stretton, Appleton, Appleton Thorn, Grappenhall Heys and Grappenhall. Building on Green Belt in the South Warrington area has the added impact of both destroying good agricultural land of which there is a shortage in Britain and reducing the open spaces which enable us to breathe both actually and metaphorically. The proposal will eliminate all of the Green Belt land up to the borders of the two motorways, M56 and M6, reducing the visual and sound barrier (currently provided by the intervening trees and countryside) between the residents of the South of Warrington and these trunk roads. This is also likely to have implications for air pollution drifting from the motorways on to residential areas.

If as suggested above, the development plan for new homes is unrealistic given the level of uncertainty of the needs over a 20 year projection, it is premature to irrevocably release large tracts of Green Belt land which should only be used in exceptional circumstances and is not required at the present time.

#### **Objective 4**

I have read the Draft Local Transport Plan 4 which was published at the same time as the LDP. Transport Policy is an issue which requires an ambitious national lead from Central Government. It needs to be radical, particularly in the light of recent findings on the impact of air pollution and the target for reducing carbon emissions.

The promotion of walking and cycling is to be supported at every opportunity. The proposals to improve routes for pedestrian and cycle travel and construct new routes are to be welcomed. However, to encourage it requires a pleasant and unpolluted environment. That environment is destroyed by the dominance of private cars in the urban areas, particularly during peak travel periods, when the congestion in Warrington is particularly problematic. Major investment in public transport has to be the dominant part of the solution. However, the proposals in the plan appear to be aspirational rather than concrete. The mass transport system is a nice idea but seems to be a long way from being realised.

The limited crossing points to the Manchester Ship Canal, River Mersey and Bridgewater Canal are a major impediment to travel between the south of Warrington and the town centre and northern employment areas. The LTP and LDP offers little to ameliorate this position. In particular, the congestion which is caused by the bridge traffic in Stockton Heath is an important source of air pollution and is a deterrent to using this shopping area, particularly at peak traffic times. Stockton Heath is one of the District Centres in the Borough and it would be anticipated would grow in importance as a centre for shopping, commerce and entertainment with the emergence of the proposed garden suburb. **The proposals to address this problem do not appear to be sound.**

Within the proposed Garden Suburb a strategic road is suggested to carry traffic from the residential areas on to the main travel routes. Although the path of this road has yet to be finalised, the concept path in the LDP plans has major problems, since it would traverse an area, known as Appleton Cross which already has planning permission for 375 houses. **This would appear to make the proposal unsound.**

**Yours sincerely**

**Peter Lewenz**

16 June 2019