From:
To:
Local Plan

**Subject:** Objection to Warrington Local Plan 2019

 Date:
 17 June 2019 14:10:22

 Attachments:
 Traffic 0821 12 Jun 19.png

To Whom It May Concern,

I wholly object to the Local Plan Consultation in its current format and kindly request more lengthy and thorough analysis and assessments of the development of Warrington be made, so that an appropriate, robust and coherent plan be made and implemented that will enhance Warrington for all, not just those companies and individuals who seek to make a profit.

I have noticed the significant increase in traffic that has occurred in the intervening years; with what would have previously been considered 'rush hour' traffic occurring at most times of the day and the morning and evening rush hours being unbearable due to the extent of the gridlock.

## Congestion and air quality

Due to the limited number of crossing points across both the River Mersey and the Manchester Ship Canal, Warrington is extremely vulnerable to any sort of incident on the M6; the attached screenshot shows a typical morning on 12<sup>th</sup> June 2019 where the traffic leading up to Lymm interchange was so bad that Google suggested that the quickest way by 20 minutes was to drive two sides of a triangle from Thelwall to Lymm and reach the M56 via Cherry Lane in order to bypass the 2 miles of static traffic on the A50.

The local plan appears to contain no real provision to address the current congestion issues, let alone address those which will be created by the addition of almost 19,000 homes, each of which having at least one car. Most of these cars would be concentrated in the 'Garden Suburb' with a minimum capacity of 6,490 (with 4,201 to be delivered in the local plan period). All of this will clearly have a significant impact on air quality, in what is already one of the North West's and the UK's worst towns for air quality.

## **Housing and employment**

The basis on which the number of homes required has been calculated is flawed; as a with experience of statistical analysis, it clearly appears to me that the economic growth projections have been reverse-engineered from the desired housing numbers, not used to drive the housing numbers as should be the case. The view taken is clearly one of 'housing will create economic growth'.

The existing housing in South Warrington is already unattainable for many young families and professionals like myself and becoming worse. An affordable housing allocation of a maximum of 30% will still leave 70% of housing priced above what many households in South Warrington could afford, and the local plan contains barely any mention whatsoever of social housing, beyond referencing the Borough's declining stock due to the 'right to buy'. It is suggested that the large, low density warehousing and distribution centres proposed for South Warrington will generate sufficient employment to fill the 'required' housing, but this either misses or deliberately ignores two major factors:

- Workers on a typical minimum wage and/or zero hours contract in a distribution centre will be unable to afford 70% of the market-priced housing in the new developments; it is also likely that the 30% affordable housing target will be a stretch for many
- The increasing automation of the warehousing and distribution industry means that, by the time they are built, the distribution facilities are likely to have an even lower employment rates overall

As employees at the distribution centres are unlikely to be able to afford homes in the 'Garden Suburb', they will have to live further afield in Warrington or the surrounding towns and villages, adding even further to the already severe congestion and air pollution issues. The low paid, poor quality and low density of the employment does not support the case for the release of green belt land when there are other suitable alternatives available.

There also appears to be no attempt to take into account developments in Greater Manchester or Merseyside and their impact on Warrington's plan, including the impact of economic growth in those areas on Warrington's own economic growth and housing needs

## **Green Belt release**

I see no grounds or the 'very special circumstances' required to justify the loss of green belt; indeed, with such poor air quality in Warrington generated by the congested roads and motorways surrounding and crossing the town, the need for the town's 'green lung' is greater than ever.

The unprecedentedly large loss of green belt in order to provide these homes would be detrimental to the quality of life and health of the population of Warrington; not just in terms of an air filter for the town but in both physiological (space for leisure and fitness activities) and psychological (mental wellbeing) terms.

The unprecedented loss of green belt would be catastrophic for local wildlife, the extent of which has not been assessed rigorously for the local plan.

The plan currently assumes that the Fiddlers Ferry site will not be available for at least 5 years. As Fiddlers Ferry has now been confirmed by Scottish and Southern Energy as closing by the end of March 2020, the plan must be reassessed to take account of the significant release of brownfield land which would reduce the need to release green belt land to meet housing needs. Other coal-fired power station sites such as Rugeley in Staffordshire and Bold Power Station in St Helens have proven that decontamination considerations are not a bar to development on a site such as Fiddlers Ferry.

The plan makes clear that green belt land and greenfield sites must be released first in order to allow housing to keep pace with the claimed need. Developers have a natural preference for, and vested interest in encouraging the release of, green belt and greenfield sites due to the lower development costs (and consequently higher profits) involved. Given that the number of houses required has clearly been overestimated, and a +10% factor for non-availability and market choice has been added on top, it is highly likely that all of the greenfield sites will be used first and it will then become clear that no further housing is required; leaving undeveloped brownfield sites with no incentive for developers to develop them. Development on previously-developed land should therefore be prioritised.

## **Public Transport & Infrastructure**

The current public transport availability and accessibility in South Warrington is woefully inadequate for the current population and if any serious improvements are to be made to air quality and congestion, must be expanded and improved as a matter of urgency. Any new development must establish a reliable and accessible to all public transport network BEFORE new residential areas are permitted to be developed.

There is no access to any form of rail network (e.g. National or Light Rail) for South Warrington without a journey, almost invariably by car, to the town centre. Without a robust public transport solution (including the necessary infrastructure, not merely more buses on already overcrowded roads) the traffic issues will only increase.

Now that funding for the Western Link has been approved, the council have effectively admitted (despite its previous promotion as a panacea for all of Warrington's traffic ills) that it will have very little impact on congestion on its own, and that more infrastructure development is needed. The plan gives no new route into town from the South and East where the majority of new housing will be built, and still relies on the aging and increasingly poorly-maintained swing bridges which have failed repeatedly in the 'open' position in recent months, leading to further traffic chaos throughout the town.

The current infrastructure with its bottlenecks over the Manchester Ship Canal and River Mersey are clearly inadequate for the current traffic, let alone that which would be expected with 19,000 new homes. There are no clear plans for any transportation infrastructure improvements to cope with current or future demand - the only firm transportation infrastructure in the plan is the 'strategic' dual carriageway running from Barleycastle industrial estate to the M56 at Junction 10; this is clearly purely to support the industrial development and will do nothing for the proposed Garden Suburb's transport and infrastructure needs.

To reiterate, I wholly object to the Local Plan Consultation in its current format and kindly request more lengthy and robust, independent assessments of the development of Warrington be made, so that an appropriate, robust and coherent plan be made and implemented that will enhance Warrington for all.

Yours faithfully,

Steve Nixon MEng (Hons) MIET VR



