



Local Plan

Planning Policy & Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH

Dear Sirs

Warrington Proposed Submission Version Local Plan 2017- 2037

I do *not* believe that the proposals contained in the above document are sound. Whilst accepting that Warrington has to grow and some development is needed, I do *not* accept the scale and nature of what is being proposed by WBC due to the profound negative impact it will have on the future of all residents of Warrington, not just those living south of the Manchester Ship Canal who will be most immediately affected. Instead of improving the quality of life of the citizens, the proposals if carried forward will cause serious deterioration.

I consider the plan unsound for the following reasons:-

- The **plan period** is 2 years longer than it needs to be to meet government requirements. This would entail the *unnecessary* building of an additional 1,890 houses and the consequent loss of around 120 hectares of Green Belt.
- The justification for the predicted **growth levels** is *unsound*. Growth predictions are based on *unrealistic* economic forecasts and population projections. For example: If the 2016 population projections were used, there would be an increase in the local population to 2041 of 18,874. This equates to the need for only 343 homes per year rather than the 945 proposed.
- Based on the points above, the level of **Housing Numbers** are far too high and compounded by the addition of a 10% flexibility increase for which there is no justification, as the Local Plan is to be reviewed every 5 years. Therefore the base used in the current local plan should be the **lowest number of new houses possible**.
- The overestimation in housing numbers has a significant impact in increasing the need to build on **Green Belt**. Warrington will lose 11% of its Green Belt, virtually all of it in South Warrington – this is unnecessary and disproportionately spread across the Borough. The plan does not appear to have taken into consideration brown field areas which could be made available for development in the near future in order to save the Green Belt for its intended purposes. Development on Green Belt land should be a last resort after all other reasonable options have been examined.
- The **location** of new homes should be where the new jobs are being created to minimise commuting, and also be **affordable** in relation to the types of jobs created. This is *not* the case in relation to South Warrington. The 1,600 houses at Walton will all be for commuters as there is *no* new employment in that area.
- The new jobs created near the 'Garden Suburb' will be mainly distribution and logistics related and there is likely to be a **serious mismatch between the remuneration levels of the new jobs and the costs of the new housing being developed** – staff will have to commute from other areas. 5,000 houses are being developed which will mainly be for commuters as there is little existing commercial activity in South Warrington that will provide new employment opportunities.
- The **regeneration of the town centre and inner wards** will not be spontaneously triggered by

the proposals even though new facilities are to be provided. There is a very real danger that the inhabitants of the new developments will look outwards for employment and leisure activities. South Warrington will most likely become a dormitory suburb of Manchester rather than a vibrant contributor to Warrington's economic development.

- **Social Infrastructure and Quality of Life:**

- **NHS and GP services:** It is well understood that these are not within the remit of the Borough Council. Nevertheless any Local Plan should take into account the impact new developments will have on the wellbeing of current inhabitants who already struggle with accessing adequate health services.
- **Mental health:** there is increasing evidence that green spaces and nature are key to wellbeing. Using Green Belt land for employment opportunities and dwellings will prevent ready access to green spaces.
- **Education:** Although some new school provision is part of the plan, this appears to be inadequate, particularly for early years and A-levels.
- **Affordable Housing:** The plan fails to reassure how many dwellings will actually be affordable to first time buyers of limited means.
- **Heritage:** The villages of Walton, Grappenhall, Appleton Thorn and Stretton will be completely changed in relation to their **character and distinctiveness** which is contrary to the 'Vision for Warrington's future' outlined in the Local Plan.

- **Traffic infrastructure: The Local Plan and the Transport Plan must be put in place concurrent to each other.** Even so some revision is necessary to be able to deliver.

- The proposals are *totally inadequate* to alleviate the current problems of **congestion, noise pollution and poor air quality** in South Warrington and also support the new commercial and developments
- **Crossing the Manchester Ship Canal:** There is no new crossing of the Manchester Ship Canal in South East Warrington > WBC are relying on the existing Victorian swing bridges despite the projected major increase in shipping traffic necessitating the bridges being closed much more often in future.
- **Public transport system:** The Transport Plan does *not* provide any details of how the proposed increase in public transport **would cross** the Manchester Ship Canal or the Bridgewater Canal.
- **Access to the centre of Warrington:** Nothing is planned to improve the A49 as it goes north from the M56 through Stockton Heath towards the Town Centre – it is already extremely congested and polluted.

- **Water and Sewage infrastructure:** It is not clear from the Plan whether these essential services have been adequately addressed.

- The National Planning Policy Framework requires the Plan to be aspirational but **deliverable**. The current Plan is aspirational but fails to convince that it is *deliverable* and it is therefore *unsound*:-
 - The annual average delivery of 945 new houses is more than double the current build rates. There is a peak build requirement of 1,656 houses in 2025/26 which may not be achievable. Developers will only build houses if they believe they can be sold, so the control on the rate of building does not lie with WBC but with the developers.
 - While some money is available from Government for infrastructure, the bulk of the funding will need to come from the developers. The size of that funding requirement is *unclear* in the Plan as is the commitment of developers to deliver the necessary funding. Development is only acceptable with the *effective mitigation* of its key negative impacts and measures for maintaining/improving quality of life, which are *properly planned and implemented before and during the building process and before completion*.

Yours Sincerely, ,



(STELLA JAFRI)
20.06.19