



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

14<sup>th</sup> June 2019

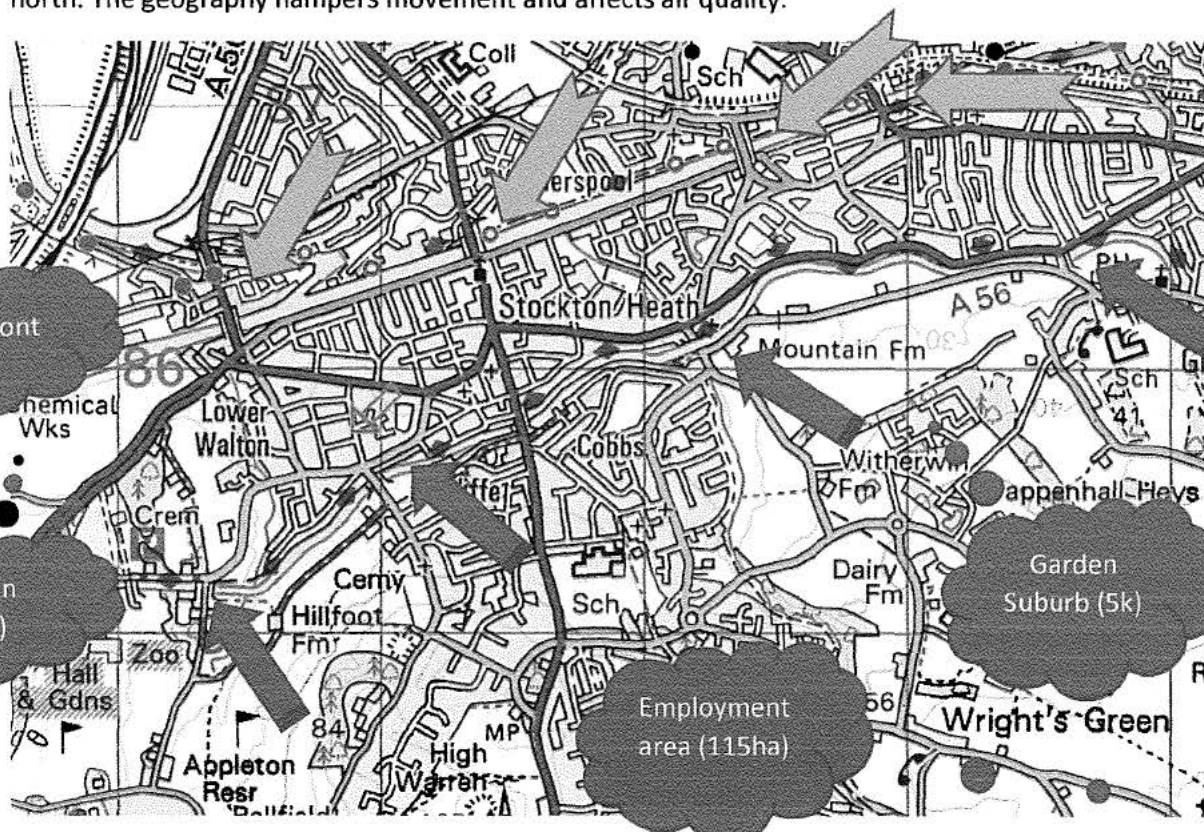
Dear Sirs,

**Warrington Local Plan 2019: Draft Local Plan Consultation (2017-2037)**

I believe that the proposals contained within the above document are very unsound, in both conception and proposed execution. The Borough Council has a duty to respect and protect the welfare and wellbeing of their current residents but the proposals will do just the opposite.

Some growth and development in Warrington is required. However, the scale and nature of what is being proposed by Warrington Borough Council (WBC) will have a profound negative impact on the residents of South Warrington in the future. Instead of improving the quality of our lives the proposals will cause serious deterioration.

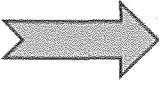
In prefacing my reasons why the proposals are unsound, it should be remembered that South Warrington is uniquely constrained by its geography, namely: (i) three significant east-west watercourses (River Mersey, Manchester Ship Canal and Bridgewater Canal) and (ii) low lying to the north. The geography hampers movement and affects air quality.



Key:



Georgian **single** track passing of Bridgewater canal (x3 overbridge, x1 underbridge)



Victorian single carriage way crossing of Manchester Ship Canal (x3 swing bridges, x1 overbridge)

Warrington is already congested, notably during rush hour and around school drop-off/ pick-up times; the problems in the south of the Borough are compounded by the ageing and narrow crossings of the Bridgewater and Manchester Ship canals. The situation has become notably worse since the opening of the new tolled Mersey crossing in Runcorn. Traffic grinds to a halt in the town if there are any problems on the adjacent M6.

The plan is unsound for very many reasons:

**Justification for the demand/ growth levels.** Growth predictions are based on unrealistic economic forecasts and population predictions. For example, if the more recent 2016 population projections were used there would be an increase in the local population to 2041 of about 18.8k. This equates to the need for ~340 homes per year rather than the 945 homes per year proposed.

**Length of plan** The plan period is 2 years longer than it needs to be to meet government requirements. This equates to the unnecessary building of additional houses (~1.9k) and the loss of valuable Green Belt land (~180 ha).

**10% flexibility increase** This is not required as the Local Plan is reviewed every 5 years. The lowest number of new houses possible should be used in the development of the Local Plan.

**Green Belt** The proposals have a significant adverse impact on the use of valuable and scarce Green Belt land. Warrington will lose ~11% of its Green Belt land and the majority of this loss will be in South Warrington. Loss, if any, should be borne across the Borough.

**Industrial development/ employment area** The proposed industrial development is hugely unimaginative, being based on warehousing and transport. This provides poorly paid employment and, in all probability, will attract people from out of the area rather than from the proposed new houses. 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 job created. This will not be the case in relation to South Warrington:

The 1600 houses in Walton will all be for commuters as there is no new employment in that area.

	5000 houses are proposed for the Garden Suburb that will mainly be for commuters (most probably to Manchester or Liverpool) as there is little commercial activity in South Warrington that will provide new employment opportunities.
Walton, Grappenhall, Appleton Thorn and Stretton	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	Refer to annotated diagram above. The new developments would put an intolerable strain on existing ageing and overused roads. There are no plans or proposals to manage or mitigate this.
Deliverability	<p>The National Planning Policy Framework requires the Plan to be both aspirational and achievable. I do not believe the draft Plan is deliverable:</p> <ul style="list-style-type: none"> <li>• WBC has already suffered significant reductions in staff numbers and will not have the numbers or quality of staff to oversee the work and hold developers to account.</li> <li>• The annual average of 945 new houses is more than double the current build rates (359 in 2018/19). The peak build requirement of 1656 houses in 2025/26 is clearly unachievable.</li> <li>• Developers will only build houses that they can sell. The rate of building will not lie with WBC but with the developers.</li> <li>• The money available from Government for infrastructure is limited. The bulk of infrastructure needs will have to be funded by the developers. Again, WBC will cede control to developers and the market.</li> <li>• Any future development is only sound if key adverse impacts (e.g. air quality, traffic congestion, noise, green spaces etc.) as well as the Council's responsibility to maintain and improve our quality of life are properly planned and implemented before and during the building process and before completion.</li> </ul>
Air quality	Warrington is low lying and hemmed in by motorways. The very large scale of the development will adversely impact air quality.
Noise	Road noise is already a problem in Warrington. The very large scale of the development will make this worse.

Undue burden on South Warrington      The Local Plan is almost entirely focused on the south of the Borough. The burden of the loss of Green Belt should be shared across the Borough. Other parts of the Borough have easier access to the national rail network, the main East-West motorway, and the town's main employment areas such as Risley/ Birchwood and Omega.

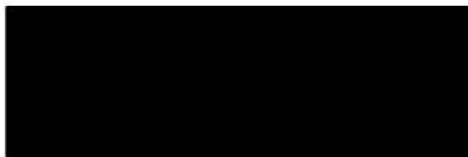
Access to rail services      Warrington's rail services are either in the centre (Bank Quay or Central) or north of the centre (Chapelford, Birchwood, Padgate) of town. New residents will either have to use the ageing and overused bridges across the Bridgewater and Manchester Ship Canals ... or avoid public transport and use their cars. The new proposals will therefore have an adverse environmental impact with consequences to public health and quality of life.

Communication/ consultation      The only information that I have received as a resident has come through local councillors. WBC have made no attempt to reach out to me and seek my views on the proposals. This could have been simply and cost effectively achieved, for example by inclusion of information within information sent with the new council tax in march 2019.

The figure provided above is just a part of the land included within the boundary of Warrington. It clearly shows the adverse impact of the proposals on Green belt, amenity land and transport. It may also be readily appreciated how the Local Plan disproportionately affects residents of South Warrington and is not shared more equitably across the Borough.

For the reasons developed above, the Local Plan is unsound and if adopted Warrington Borough Council would be failing in its's duty to respect and protect the welfare and wellbeing of their current residents.

Yours sincerely,

A large black rectangular redaction box covering the signature of Jonathan Clark.

Jonathan Clark