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12 June 2019

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 residents of South Warrington in the future. Instead of improving the quality of our lives, the proposals will cause serious deterioration.

The plan is unsound for the following reasons:-

#### **PLAN PERIOD & ASSUMPTIONS**

- The **plan period** is 2 years longer than it needs to be to meet government requirements. This necessitates the *unnecessary* building of an additional 1,890 houses and the consequent loss of around 120 hectares of Green Belt.
- There is *no* justification for the predicted **growth levels**. 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.
- Consequently, due to the 2 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 need, as the Local Plan will be reviewed every 5 years. I believe the lowest number of new houses possible should be used in the development of the local plan.
- Growth is predicated on new housing development creating economic benefit, instead of the other way round.

## GREEN BELT

The National Planning Policy Framework states that Green Belt boundaries should only be amended in exceptional circumstances and this has not been demonstrated.

- The Green belt boundaries were only set 5 years ago in a plan that was supposed to last 20 years.
- Why should green belt land be used for construction of Warehousing and transport terminals - how can this be regarded as exceptional?
- No intent to guarantee use of brownfield sites. Why is some of the first development (at Lymm) coming on stream first?
- Use of potential large brownfield sites such as Fiddlers Ferry has not been adequately considered on basis of uncertain timescales for decommissioning. This is not a defunct nuclear site timescales are determinable now and its use should be investigated seriously. Its closure has now been confirmed as March 2020.
- The LP seeks to create urban sprawl and does not safeguard the countryside from encroachment.
- 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. I believe the loss of Green Belt, if any is really required, should be spread more evenly and be a last resort after all other reasonable options have been examined.
- How does building on agricultural land fit with a green economy and national objectives?

## DEVELOPMENT LOCATION

- 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 their number will be low. Where are the thousands of jobs coming from that create this housing need. The large numbers of predominately higher value homes will become a commuter area with the new residents working outside the area.
- 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.
- The proposed scale of development will have a devastating impact particularly on Stockton Heath which is the prime destination for residents in south Warrington for shopping and socializing; there is inadequate car parking now with parking over spilling into residential areas; even with alternative modes of transport this plus cars diverting to reach the Western and centre park bridges will create unbearable levels of congestion and worse air quality.

## INFRASTRUCTURE

LTP4 which should offer identified solutions to support the LP is not a transport plan but simply a menu of options which are uncostered without timescales and as a result funding sources cannot be identified with the necessary certainty and is not a suitable transport strategy to support the LP in a meaningful way.

The Q&A's issued at the consultations in respect of LTP4 exemplify the uncertainty:

- Warrington south strategic infrastructure (new part dual link road to garden suburb) - (at Page 3)..... "we will explore all funding options" i.e. later. So a multi-million piece of essential highway infrastructure has no identified funding source.
- High level Cantilever bridge - (at Page 5)..... "the type of improvement is not known, funding is not in place and a start date is not known". This scheme has been in the planning stage for 30+ years already with consequent blight.
- New crossing of the Manchester Ship Canal - (at Page 5) - accepts that physical improvements including a new crossing required but only commits to ..... "Within the first five years of the LTP4 to undertake further study work into what form of crossing is required, it's where its location should be". This is a key piece of infrastructure yet so little thought has been given to what will be an extremely challenging task given the geographical constraints, engineering requirements and public opposition.
- Even the Western Link has only passed into programme status so funding is by no means certain.

The LP fundamentally relies on an existing road network which is currently massively over capacity. Whilst the western link and Centre Park Link bridges will help to alleviate the some traffic issues the scale of the development will significantly degrade their effectiveness.

The traffic infrastructure proposals to alleviate the current problems in South Warrington **and** also support the new housing and commercial developments are totally inadequate for the following reasons:

- The 'Garden Suburb' will have 5,000 new houses with consequent daily car journeys of around 10,000:-
  - There is *nothing* currently 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.
  - There is *no new crossing* of the Manchester Ship Canal in South East Warrington > WBC are relying on *the existing Victorian swing bridges* (over which they have no control) despite the projected major *increase in shipping traffic* necessitating the bridges being *closed* much more often in future.
  - The Transport Plan does *not* provide any details of how the new public transport systems would cross the Manchester Ship Canal or the Bridgewater Canal.
- The already congested and polluted A56 will need to support and contend with:-
  - around 7,000 daily car journeys emanating from the Walton Development and the new houses Halton Borough will be building near the A56.
  - around 5,000 daily car and HGV journeys associated with the Waterfront development via the Western Link.

- many people will use the Western Link rather than pay the tolls on the other 2 Mersey crossings.
- traffic to/from South East Warrington using the Western Link via A56.
- the new Western Link junction plus the 2/3 other new junctions needed to access the Walton housing development, will cause the traffic to *stop and start* continuously between Walton Village lights and the Western Link junction with consequent increase in emissions.

## DELIVERABILITY

- The National Planning Policy Framework requires the Plan to be aspirational but **deliverable**. I do *not* believe this Plan is deliverable and is therefore *unsound*:
  - The annual average delivery of 945 new houses is more than double the current build rates (359 in 2018/19). There is a peak build requirement of 1,656 houses in 2025/26 which I do not believe is 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 for infrastructure.
  - Funding for community infrastructure (schools, sports facilities, health centre etc.) has not been adequately researched and identified.
  - Other funding sources are referred to in the LP (workplace parking levy or as a last resort Community Infrastructure levy) but both are likely to be unacceptable to business or residents.
  - Is it acceptable to propose building thousands of houses before the necessary infrastructure has been planned and implemented where necessary?

## SUMMARY

In summary the proposals are politically motivated (WBC stated aim to achieve City status) are not objective, fail to recognise the geography of particularly south Warrington and the inherent limitations on improving links across the ship canal and hence the LP and LPT4 has postponed any consideration of what is feasible until after the LP is approved.

The attitude of WBC is let's build now (its already happening), worry about the infrastructure later and if it's not feasible or affordable so be it.

Yours Sincerely,

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Judith Mulvee

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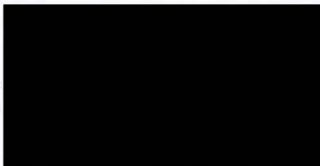
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