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



13th June 2019

Dear Sir or Madam

## Warrington Proposed Submission Version Local Plan 2017-2037

The proposed submission version of the Local Plan is barely different from the 'Preferred Option' (PDO) which met with huge public opposition in 2017. I believe that the proposals contained in the above document are unsound. Whilst accepting that some development is needed to accommodate future growth, I do not accept the scale and nature of what is being proposed by Warrington Borough Council (WBC) due to the profound negative impact it will have on the residents of South Warrington in the future. It would be detrimental to health and wellbeing. If implemented, the Local Plan to urbanize South Warrington would turn what is a very desirable area to live into a gridlocked urban sprawl with increasing noise levels and pollution significantly reducing the quality of life currently enjoyed by its residents. The local residents have not been consulted upon the framing of the plan aims, principles, values or proposals for Warrington. Emphasis should have been placed on urban quality, local distinctiveness and traffic. Every effort should have been made to minimize the loss of our precious green belt. The proposed Local Plan does not do this and is therefore unsound.

# Urbanisation of south Warrington is neither necessary nor desirable and therefore unsound

The assumed growth levels, economic forecasts and population projections are fundamental to the Local Plan, yet no sound justification for the assumptions is provided. The enormous scale of the Local Plan is borne of WBC growth ambition for Warrington (in no small measure due to its desire to achieve 'City' status) and not of necessity. The Local Plan should be based on Warrington's projected future needs and not WBC wants.

#### Releasing green belt land to build on is not necessary and therefore unsound

The release of green belt land is not required to accommodate official population increase predictions. The official population growth figures forecast an increase of ~19,000 by 2041. This would require only ~8,000 dwellings which could readily be accommodated by existing brown field sites with the potential for sites such as Fiddlers Ferry and Lovely Lane Hospital to become free for housing within the Local Plan timescale. In addition, the plan period is 2 years longer than government requirements. This represents an unnecessary loss of over 100 hectares of green belt.

There have to be exceptional circumstances for Green Belt land to be released for development. There is certainly no need to release Green Belt land at this juncture especially when available brown field sites are currently sufficient for future needs. It is inevitable that the most profitable sites (i.e. South Warrington Green Field sites) will be the first ones chosen by the developers if this Plan is passed. Our open countryside is precious and cannot be recovered once it is built on. It should not be sacrificed for developer profit and Council revenues. It is counter-productive to the environmental challenges the Government and WBC are trying to address and is therefore unsound.

## No mitigating measures to avoid gridlock at Stockton Heath and therefore unsound

South Warrington has suffered traffic congestion for as long as I can remember. Over the decades it has never been solved. Stockton Heath with the intersection of two main road arteries A49 and A56 with pelican crossings and the presence of the operational swing bridge has always been a major traffic bottleneck and will remain so under the local plan.

The frequency of Manchester Ship Canal boat traffic will increase markedly thus causing more frequent tailbacks due to the bridge swings making it even more of a bottleneck. Furthermore, WBC has no legal control over the frequency and timing of canal traffic which is entirely in the hands of Peel Ports who own the Manchester Ship Canal, the planned Warrington Port and swing bridges. Their decisions will naturally be based on what is commercially best for them rather than the impact on road traffic. The WBC relies only on the goodwill of Peel Ports to try and minimize the impact of the swing bridges on the road traffic. The URL below is a web page which shows the swing bridge stuck about a month ago and the photograph in the article indicates the poor state of maintenance despite representations to Peel Ports by WBC over the years.

https://www.warrington-worldwide.co.uk/2019/05/13/chester-road-swing-bridge-stuck-in-open-position-again/

The local Plan relies heavily on the existing Victorian swing bridges despite the projected major increase in shipping traffic necessitating the bridges being closed much more frequently in future. The road infrastructure plans comprise distributary link roads from the proposed new massive housing estates (referred to as 'Garden Suburb') and business parks / industrial estates (referred to as 'Employment Area') to these main road arteries. This will generate thousands more car journeys along these already overburdened trunk roads causing gridlock particularly at Stockton Heath with the consequential substantial increases in pollution. The Plan states that a new strategic link for the 'Garden Suburb' is 'fundamental' but no detailed plan or route is indicated – only links to the already congested main trunk roads are mentioned. There is nothing to mitigate the bottleneck at Stockton Heath.

The combination of more regular bridge swings and increased potential for breakdowns and thousands of extra car journeys on the A49 and A56 will create total gridlock and is therefore unsound.

#### **Detrimental impact on South Warrington villages**

The character and distinctiveness of the villages of Warrington South such as Walton, Appleton Thorn, Grappenhall and Stretton communities will be subsumed into one urban mass. Take Walton for example:

- Walton would triple in size another 1,600 houses which will virtually all be for commuters as it is extremely unlikely there will be any significant new employment in the Walton area.
- 112 hectares of Green Belt would be permanently lost leaving no real strategic gap between Warrington and the Halton Borough Council boundary at Moore
- An extension of the urban area from Lower Walton as far as Walton Village and Runcorn Road, completely changing the character and distinctiveness of our area
- Around 5,000 daily car and HGV journeys associated with the Waterfront development via the Western Link.
- Around 7,000 daily car journeys emanating from the Walton Development and the new houses Halton Borough will be building near the A56.

- Traffic accessing the proposed Western Link Road from south-east Warrington making Walton Road even busier, as well as generating 'rat runs' from A49 through Walton — Red Lane, Whitefield Road, Hill Cliffe Road and Belvoir Road
- A56 / Western Link generating even more congestion, traffic, noise and pollution in Walton
- 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.
- The steep incline on the northbound Western Link, will mean that traffic will be in low gears (especially HGV's) and as the Western Link is single carriageway, the achieved speed will be that of the slowest. Lorries in low gear high rev mode will generate higher levels of noise and air pollution.
- Many people will use the Western Link rather than pay the tolls on the other 2 Mersey crossings at Runcorn attracting ever more traffic.

No firm commitment that the required additional schools and health centres will be provided The Local Plan simply acknowledges the need for new schools, medical facilities and shopping centres without any firm commitment that these will be provided and is therefore unsound. Required facilities and amenities infrastructure needs to be planned for, funded and committed to before even considering building thousands more houses.

Housing has not been prioritized to where the jobs are being created to minimize commuting The location of new homes should be where new jobs are being created to minimize commuting. The homes should also be affordable in relation to the type of jobs being created. This is not the case in relation to South Warrington. There is likely to be a serious mismatch between the remuneration of the new jobs and the cost of the new housing being developed; staff will have to commute from other areas. Therefore it is not sound.

## Effective mitigation measures of key impacts are not identified in the Local Plan

It is clear that the Local Plan has not been properly thought through For South Warrington t g е

there are very few, if any, effective mitigation measures of key impacts (traffic congestion / gridlock, air quality, noise, environment, education and health facilities, local amenities and the environment) identified in the Local Plan.
Development cannot be acceptable unless it is sensible and proportionate with sound and effective mitigation of key impacts which are properly planned and implemented before and during construction. The Local Plan does not achieve this and will have a profound deleterious impact on the quality of life of South Warrington residents. If carried out, it will devastate South Warrington.
Yours faithfully
Margaret Leigh