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Sirs

Local Plan Planning and Policy Programmes

I object to the Local Plan and wish to make the following points:

Plan is not appropriate for Warrington's Needs

- This plan is not good for anyone living in Warrington, whether north or south of the river.
- The Council's figures lack rigour, clarity and logic. The way they are reached is far from clear. Economic growth targets would appear to have been set by those who have a vested interest in overstating growth predictions. Thus the se over optimistic predications will lead to inflated housing need forecasts
- Estimates of need are based on figures calculated in 2014, rather than *those established* in 2016, which are *considerably lower*. These lower figures should be the starting point for any planning. Yet, 2014's plan envisaged 800 houses p.a., whilst in 2017 the council required 909 p.a. with a contingency of 10% in the plan. In total an additional 3220 houses above 2014's. Yet, the need figures have fallen.
- It will not be possible to deliver these over-optimistic plans. The figures should be challenged and a consideration of what is realistic and achievable should be made.
- Moreover, the Old Age Dependency Ratio for Warrington has grown more quickly than England's as a whole since 2003. By 2039 it expected to grow to 43.8 (40.5 for England). Therefore, almost half of the population will be over 65. This group will not require employment, nor will they need 'executive housing'. The housing growth envisaged is not suited to the needs of this group of people; the council should be investigating supported living, retirement homes and similar dwellings.
- The house building numbers identified are unrealistic in regard to what has been achieved previously in Warrington. The plan is for 900 houses per year, when Warrington new builds have never exceeded 500 per year
- The figures used in the plan have been disavowed by the Secretary of State for Communities and Local Government. James Brokenshire M.P. has emphasised that these figures are 'not a target' and that the local authority should make a realistic assessment of the number of houses needed.
- He has also emphasised plans must take into account land availability, relevant constraints and whether the need could be met more appropriately in neighbouring areas

- No information is provided about how the Plan will result in town centre regeneration. The proposals are insufficient to trigger regeneration and new Town Centre employment. Thus, the same pattern of commuting into Manchester and Liverpool for work, shopping and leisure will continue,
- Nor is information given concerning how the distinctive character of South Warrington will be preserved. These are both Warrington Council policy objectives

Economic Growth

- Growth predictions for the town are unrealistic and are based on estimates of development rates that have never been achieved
- Again, no consideration has been given to developments that are occurring in Greater Manchester and Merseyside and how they will impact on Warrington.
- The assumption would appear to be that housing will drive economic growth, rather than economic growth leading any housing developments
- The BE Group and Mickledore Report January 2019 shows that the main growth in employment in Warrington will be in distribution, transport and storage; these are not the high level employment that Warrington needs.
- Jobs of a similar nature, on the Omega site are usually minimum wage or zero hour contracts, at around £16-17,000 p.a., whilst the average salary in Warrington is around £24,000
- Those employed in the warehouse and distribution centres are likely to be commuters from outside the area and hence there will be little increase in employment for local people. Many of the employees used by Stobart's are actually contract staff, no case has been proved in respect of employment, since most jobs would be relocated from existing sites, and figures for jobs do not show new and permanent employment
- The plan gives no indication of how the Town Centre will be regenerated

Green Belt

- The fundamental aim of Green Belt policy is to prevent urban sprawl, so that neighbouring towns do not merge, to assist in safeguarding encroachment on the countryside, to preserve the setting and character of historic towns and to assist in urban regeneration, by encouraging the recycling of derelict and urban land.
- WBC has not demonstrated the exceptional need to remove or develop any of the Green Belt (as required under NPPF paragraph 83). WBC is not following standard practice in their assessment of the Green Belt and appears to be driven to its development. Exceptional circumstances are needed to be proved before any boundary alterations. Thus, the Plan is in a sharp contradiction to WBC's own policies!
- Five years ago the Boundary was confirmed for a period of **20 years**, yet the Plan reduces Warrington's Green Belt by 11%, most of which lies in South Warrington.
- The Plan does not show what the 'very special circumstances', required for annexing of the Green Belt are. WBC appears to want the development of the Green Belt at all costs
- More brown field sites are likely to become available, and there is no need to release Green Belt when sites such as Fiddlers Ferry and Lovely Lane Hospital may become free for housing within the next 20 years.

- The release of Green Belt land is not spread evenly across the borough, with the villages of Appleton, Grappenhall, Stretton, Walton and Moore are particularly badly affected, which seems grossly inequitable.
- The integrity and individuality of villages is threatened with the loss of distinct boundaries and 'spread'. There is no consideration of the amenities and conservation areas that would be lost, and the villages and towns of South Warrington that would merge into one. It would appear that the Plan was written with an end result in mind rather than to correctly assess the areas in question.
- There are no effective assessments of the immense loss of habitats, and thus species, that will ensue from the loss of Green Belt
- Little real consideration has been given to first use of brown field sites for development, before looking at release of Green Belt land. The ecological, environmental and social impact has been given purely lip service, and the real effects have been disregarded
- The Grappenhall Garden Suburb will consist of extensive warehousing facilities and 4200 houses are due to be built. This will take a huge chunk out of the Green Belt.
- Developments in Halton and St Helens Green Belt adjacent to Warrington will also impact on the utility of our Green Belt, the loss to our communities and visual impact will all be compounded.
- The council needs to coordinate any developments with those envisaged by other councils Green Belt land adjoining our borough, in St Helens and Halton is also threatened by their developments. Thus, the cumulative effect of Green Belt loss surrounding Warrington is much greater than that shown on the Plan.
- Sites chosen for development are those put forward by developers and landowners in response to the 'call for sites' in the Local Plan of 2016. It is little surprise, therefore, that the Plan explores the options which give the developers maximum profit. The reasoning perhaps to get private enterprise to pay for any infrastructure required to 'unlock' land. This is possibly why the plan is 20 years, yet WBC wants to release all the land from Green Belt immediately, rather than in any phased manner. This will pass control to the developers who will 'land bank' and build according to their program for maximum profit.
- WBC's Green Belt Assessment by ARUP has no credibility, and even has a disclaimer at its heart -that it should be not used by 'third parties'. It is not signed and no one takes responsibility for its content (or their qualifications/experience). It uses inconsistent, insensitive and incomplete approaches in coming up with a 'weak' assessment for most areas. The 'Regulation 18 Consultation July 2017: Clients' Response' which was written by Harry Shipley & commissioned by residents of South Warrington provides more complete detail regarding the Green Belt assessment.

Housing

- Up to 5000 houses are due to be built in the 'Garden Suburb' in South East Warrington by 2037, with another 2300 very possible after this date
- In the South West, Walton will triple in size, with the planned urban extension of 1600 houses. This will also remove a large part of the Moore Nature Reserve
- The planned housing is not affordable to local people. Only 30% of the total is required to be 'affordable housing' hence insufficient for local needs. No information is available about 'social housing' or council housing. The likely prices for the majority of houses will run from

£250,000 to £750,000. There are around 3,500 people in need of social housing, who will not be able to afford such prices.

- Moreover, those who buy the 'executive housing' are likely to treat the development as a dormitory area and will be commuting to other towns.
- The housing mix needs to be balanced with affordability, and the local jobs mix, in order to avoid increased traffic congestion
- The housing planned for South Warrington is too far from railway stations, so their occupants not be able to adopt environmentally friendly forms of transport. It is highly likely that traffic across the town will be increased considerably. The Garden Suburb and South West Extension, their location and scale are illogical and unwanted.
- There are no firm plans for appropriate health and education and other infrastructures to support the increased population of the area. No housing should be developed until it has been preceded by suitable and sufficient hospitals, GPs, shops, schools, play areas and nurseries etc.

Road Issues / Infrastructure/Environment

- There are no reliable traffic assessments available as the starting point for the plan
- The Infrastructure proposals do not involve public funding, yet there is no information concerning the source of such funds
- It is likely that, although houses will be built, supporting infrastructure will not be delivered. The existing infrastructure relies mainly on a 19th century road infrastructure and canal crossings not even owned by the council. The swing bridges have been badly neglected and are corroding and faulty, with frequent breakdowns. They cannot cope with road traffic as it is now, let alone after the massive increase in numbers that would be the outcome of the additional 7,000 houses in the Garden Suburb.
- Additionally, no indication is given as to how the traffic from the Garden Suburb will cross the Bridgewater Canal. The present bridge onto the A56 at Church Lane is hopelessly inadequate and the junction at Lumb Brook Lane already produces extremely long queues in all directions, before the additional traffic from the new housing is added. Any new crossing would simply add another pinch point to the A56. Such vagueness is not acceptable,
- Should the canal traffic increase as a result of Peel Holdings plans for the Ship Canal the number of trips along the canal will be increased considerable. Every additional trip will result in a closure of the main artery from Warrington to the south along the A49 and consequent delays to the increasingly heavy traffic. Moreover ships using Peel Port will be forced to travel up the Ship Canal as far as Lymm to turn round. So they, too, will have to pass through all three swing bridges, adding even more closures. The A49 at Stockton Heath will become a car park!
- There is no confidence that infrastructure can, or will be delivered, either to the main settlements or smaller outlying areas, such as Lymm or Burtonwood
- Information in the plans is vague and sketchy, with no plans envisaged for improvements of the A49 as it travels north from the M56. The A49 will take the bulk of the extra traffic, which will bring pollution, and gridlock yet, there is no detail concerning what the new road network would involve, nor how this would be funded.

- LPT4 discussion of infrastructure appears to be little more than a 'wish list', with no detailed and evidence based information
- A full multimodal transport model is required. (No proposals are given concerning how the increasing number of South Warrington residents may access the centre of town. Is a new road envisaged, tram-routes, cycle-routes or improved bus routes?). This would demonstrate not only the required highway improvements but also the way an additional (conservatively) 46,000 people (2.3 per household) would be expected to commute around the borough. By neglecting to provide such detail, WBC have not followed their own policies or good practice and it renders the Plan undeliverable
- The A49 is already excessively congested, with traffic queues backing up to the M56 roundabout and town centre. No new route into the Town Centre is envisaged, either to relieve the A49, or to provide a route from the South East
- The public transport schemes described within the Plan are all bus routes and will obviously use the road network adding further burden. The routes given within the south of town are not deliverable due to the levels of congestion around the canal crossings and that no improvement will be made to the network until year 15!
- The plans for suitable canal crossings are vague and no information about their funding is available
- Developments to the Cantilever Bridge are estimated at around £50k. There is no consideration of the costs of housing and land that would need to be purchased to undertake this. Nor any assessment of the impact on home owners or families and the road network surrounding the bridge
- All access from the South to the Town Centre is reliant on three Victorian swing bridges. These are owned by Peel Holdings and hence all north /South traffic can be held to ransom. The bridges are poorly maintained, and frequently get stuck open, which can have a disastrous impact on congestion.
- The new bridge across the Mersey from Centre Park / William Patton Street will bring traffic onto the A5060 at Gainsborough Road. Thus moving congestion out of town and into the suburb. The traffic will still be dependent on crossing the outdated and unreliable bridge
- Warrington already has issues with air quality and removal of green space will only exacerbate this trend
- As will the plan's over-reliance on car transport
- The Public Health Report 2018 identified areas of poor air quality along the motorways and main traffic routes. Warrington has breached WHO safe levels of PM2.5, these particulates include smoke, soot dirt and dust. The predominant source of pollution is from traffic and all the major routes through South Warrington suffer from congestion and standing traffic at the main commuting periods, and indeed, throughout most of the day. The Air Quality Action Plan (amongst 18 actions) identifies the requirement to reduce traffic impact and strategies to mitigate its impact. The Council committed to ensuring that new developments would not have a negative impact on air quality or exacerbate air quality in AQMAs or contribute to air pollution in further areas being designated. It is impossible to understand how this can be achieved in the light of its proposed developments.
- The Plan relies heavily on road transport (mainly private car). By WBC's own figures 60% of measured sites already exceed targets for harmful air pollution. The trend is only rising and congestion is increasing (from the Mersey Gateway for example). Warrington already

has the 2nd highest pollution figures in the North West of England. 20,000 new homes will bring over 30,000 cars onto Warrington roads and with many using Warrington as a dormitory town, it can only be concluded that during the life of the plan Warrington will exceed all air quality targets. This will result in more than the 4.8% of deaths currently attributed to Warrington's pollution. Within the Plan there is no mention or strategy on how this will be improved.

- Displaced traffic from the tolled bridges at Halton, much of which is highly polluting HGVs, is coming through the centre of Warrington and will also use the Centre Park link when it is open, further increasing congestion and pollution
- The Development Programme would see a massive increase in private and HGV traffic movements. Whilst the new roads will funnel increased traffic flows into South Warrington's existing road network. Which will be hugely overburdened by the traffic associated with new housing and the Stobart's and Six 56 developments.
- All of the above does not include the loss of Warrington's 'lung' – perhaps giving all who live in this area a 'double-whammy' of increased pollution without the space to counteract some of it!
- The only firm proposal for a road is for a new wide dual carriageway strategic road running parallel to the M56 linking the Barleycastle Industrial Estate to junction 10. This will become a rat-run for HGVs, but will in no way serve the proposed new housing
- The motorways surrounding Warrington are also at capacity and therefore cannot handle any real increase in traffic. Indeed, the Highways Agency have already written to WBC stating this is a major issue and yet WBC have not proposed or funded any improvement to the motorway network.
- The Plan contains very little on how the people of Warrington will commute for work or pleasure. There are some smaller considerations which will simply shift bottle-necks rather than assist with traffic flow. Public transport centres solely on new bus-routes, further choking the road network. No infrastructure improvements appear to have been funded or, in some cases, even considered (Motorway traffic) and there has been no multimodal transport assessment. The Plan will only worsen Warrington's already poor air pollution. It is therefore undeliverable and unsustainable.

Deliverability

- WBC must follow the criteria set out in the National Planning framework (NPPF) when preparing a local plan. Paragraph 173 of the NPPF is entitled "Ensuring viability and deliverability";
- "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable".
- Paragraph 177 continues: "It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies

should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review”.

- The NPPF makes it clear that it is for the Council to demonstrate the deliverability of the Plan. For reasons given in the previous sections of this report, the Council has failed to do this nor has the Council provided proper costings to demonstrate that the infrastructure necessary to facilitate the development can be funded..

In Summary:

- The 5 criteria for release of green belt land have not been fulfilled
- The plan is not based on sound information or estimates
- It is vague and lacking in realistic and detailed plans
- It is not sound or deliverable

Yours faithfully

Paula Young