

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Trams for Warrington Representation on the Proposed Main Modifications to the Updated Proposed Submission Version Local Plan 2021-2038  
**Date:** 25 April 2023 15:36:12

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You don't often get email from [REDACTED].

Dear Sir

Trams for Warrington wishes to make the following comments in respect of the main modifications to the Updated Proposed Submission Version of the Local Plan 2021-2038:

- a). The proposed housing numbers are irrational and over-ambitious as historically Warrington's build out rates have ever been realised and have fallen significantly below targets set. A new homes target of 816 per annum (14,688 over the plan period to 2039) is irrational:
- b) The transport infrastructure required to support overly-ambitious housing targets will place a further unbearable burden on a town which is already struggling to cope with too many cars. Warrington and South Warrington, in particular, suffers from geographical constraints which are unlike any other town of its size. For instance, we have the crossings of the Bridgewater Canal, the Manchester Ship Canal and the River Mersey. An added and very real complication is the Victorian Swing Bridges over the Manchester Ship canal which have not been maintained and which frequently get stuck in the open position causing traffic tailbacks in all areas of the town for some considerable time each time this happens. These bridges are completely inadequate and are not compatible with the proposed housing numbers;
- c) Local Transport Plan 4 (LTP4) underpins the Local Plan but it is singularly unambitious and short-sighted in so far as the main focus has been on active travel (walking and cycling), buses and on the provision/enablement of electric vehicles. Warrington's Own Buses are operating significantly below capacity and even with the introduction of a temporary £2 fare, numbers of passengers have not increased enough to ensure the continuing future and financial sustainability of buses in Warrington. LTP4 states that growing bus patronage is a challenge - it is a challenge at which it is currently failing;
- d) The scale of the proposed residential development would bring Warrington to a grinding halt unless there is absolute certainty over the transport infrastructure. LTP4 does, indeed, show pictures of trams and an indicative Mass Transit Network. It states that the council proposes to look at options, designs and feasibility within the first 5 years of LTP4. We are now in year 4 and the council has shown little or no appetite to advance this further despite offers from Trams for Warrington to offer expertise and advice. Indeed, it has realistic plans for a tram network that would link Warrington directly to Manchester. There is a need for a Park and Ride scheme for 200 cars on the A49 and the roundabout for the M56 which would work well for Warrington's Own Buses and trams providing a multi-modal alternative. This proposed scheme would help alleviate some of the traffic issues at the A49 Cat and Lion junction. The offer from Trams for Warrington to work with the council still stands and our group has many years of experience in delivering such infrastructures throughout the UK. In addition, Trams for Warrington is willing to work with Warrington's Own Buses to ensure a truly integrated, multi-modal public transport system for Warrington residents;
- e). There is considerable uncertainty over the future of The Western Link in terms of raising the required money in a period of high inflation/shortage of materials and this compromises LTP4. Building more highway infrastructure will not solve Warrington's transport problems but will, in all likelihood, compound the problems. The Western Link is unlikely to come to fruition within the time span of the Plan;

f) If Warrington continues to build houses where the highway infrastructure is clearly not coping, then trams would be an obvious and relatively affordable option to reduce the number of cars on the road whilst giving residents an affordable, plausible, clean and easily accessible public transport alternative;

g) Warrington is consistently in the top five towns in the North West for poor air quality and the World Health Organisation has lowered its threshold. I live on the outskirts of Warrington and it would be natural to assume that the air quality would be acceptable. However, please see the recent report below that shows that the air pollution where I live exceeds WHO guidelines for PM2.5, PM10 and NO2.

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This address is in  
the 46th national percentile  
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EXCEEDS THREE W.H.O. LIMITS  
LEVELS & HEALTH EFFECTS  
Pollutant one: PM2.5

At this address, the annual average of the pollutant PM2.5 is 9.69mcg/m<sup>3</sup>. The World Health Organization limit is 5mcg/m<sup>3</sup>.

These particles, which are less than 2.5 micrometers in diameter, can cause [asthma, respiratory inflammation](#) and even [promote cancers](#).

Pollutant two: PM10

The reading for PM10 at this address is 15.53mcg/m<sup>3</sup>. The limit is 15mcg/m<sup>3</sup>.

PM10 can cause [wheezing, bronchitis and reduce lung development](#).

Pollutant three: NO2

The reading for NO2 at this address is 19.01mcg/m<sup>3</sup>. The limit is 10mcg/m<sup>3</sup>.

Exposure (for a year or more) to 30mcg leads to a 5.5% increased risk of [disease related mortality](#).

An Air Quality Symposium, organised by Trams for Warrington, has showed that residents in Warrington are becoming more and more aware of the effects poor air quality has on their health and, unfortunately, Warrington Borough Council is slow to put in relevant air quality monitors which monitor PM2.5 and PM10 throughout the town. This is of paramount importance to the health and well-being of Warrington residents and building 816 new houses a year would bring in over 1600 extra cars a year onto Warrington's roads. It is well-known now that it is not tail exhaust emissions that cause the damage but rubber (tyres) on rubber (roads) ie Non Exhaust Emissions that are responsible for PM2.5 and PM10. It would be irresponsible to inflict more cars on a town that already suffers from poor air quality.

h) The new NPPF is soon to be implemented and Inspectors should not feel pressure from Government to force Local Plans through (even at a late stage) before the implementation of the new guidelines. The issues facing Warrington today are different again from those it was facing when the whole process began in 2017. Any Local Plan should reflect Warrington as it is now, in April 2023 - it should reflect new knowledge (air quality) and new, better ambitions for our town. In this respect, we still do not consider the proposed Local Plan 2021-2038 is SOUND and, in view of new planning regulations due to be implemented imminently, we feel that the Plan should at the very least be paused.

Yours faithfully,

**Clr Sharon Harris**



For, and on behalf, of Mr Ian Buttress, Mr James Harkins and Prof Lesley Lewis (Trams for Warrington)