

WARRINGTON PREFERRED LOCAL DEVELOPMENT PLAN 2017 CONSULTATION

I object to the preferred option on the following grounds:

- 1. Assessment of the implications of the proposed development for infrastructure capacity is flawed.** In relation to infrastructure, the preferred option focuses almost entirely on internal connectivity within the new areas of development. Insufficient consideration has been devoted to the traffic implications in adjoining areas and the capacity of the existing road network to absorb potentially substantial increases in demand. The proposed crossing of the ship canal at Thelwall deposits a significant volume of traffic in Latchford, apparently with no consideration for capacity in that area. The consequences would be felt in existing areas where capacity is already heavily constrained, notably at Bridgefoot and across the Mersey. The potential for developer contributions as part of any planning permissions is unlikely to be sufficient to fund the level of investment required. Funding for motorway improvements alone would require substantial investment, which may not prove forthcoming. The same applies to public transport: the existing documentation focuses almost exclusively on internal connectivity without considering capacity constraints on, for example, the transpennine rail network, where passenger numbers at peak times already substantially exceed capacity.
- 2. The methodology employed to assess existing housing land supply is inadequate.** Assessment of the supply of previously developed land does not take account of all of the brownfield sites that lie in and beyond Warrington Borough Council's boundaries. SSE has indicated that the Fiddler's Ferry power station is likely to be decommissioned during the anticipated timescale for the proposed housing development. This site alone would yield a significant area of land with potential to be remediated for housing development.
- 3. Failure to apply in an effective way the Duty to Cooperate provision set out in the Localism Act 2011.** Related to point 2, the proposed housing development would have significant sub-regional impact, extending well beyond Warrington Borough Council. The imbalance between supply and demand of housing land in Warrington is much less marked in adjoining local authorities. In some cases, existing land supply in neighbouring boroughs is capable comfortably of meeting likely demand for the foreseeable future. Given the scale of the proposed expansion of housing in Warrington, and its repercussions for surrounding areas, WBC needs to demonstrate conclusively that it has worked with neighbouring boroughs to identify the potential impact on them. WBC also needs to demonstrate it has cooperated with adjoining authorities to assess in a systematic way the potential for housing land outside Warrington to cater for demand that might otherwise

necessitate the release of additional housing land in Warrington itself. Given that a host of research studies demonstrate that functional sub-regional housing markets do not map readily onto local authority boundaries, there is a need to ensure that housing land availability and need are assessed at a meaningful geographical scale, extending beyond the rudimentary approach set out in the SHLAA.

- 4. Unjustifiable impact on local amenity and green infrastructure.** The proposed development would have deleterious impact on the ability of Warrington's residents to access the town's green spaces. The integrity of the Transpennine Trail would be severely undermined. The *Adapting the Landscape* strategy of the former regional planning and economic development agencies for the North West was based on research which demonstrated the value of green infrastructure in terms of public health, recreation and leisure opportunities, nature conservation or biodiversity in and around the Mersey Basin. The council's preferred development option proposes the creation of new green infrastructure by way of compensation, but there has been no systematic assessment of the net impact of eroding the existing stock of green spaces. WBC has not provided any reliable evidence of the net strategic environmental impact of the preferred development option.

