

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Warrington Local Plan and 4th Local Transport Plan (LTP4)  
**Date:** 15 June 2019 17:34:27

---

Dear Sir/Madam,

**Warrington Local Plan and 4th Local Transport Plan (LTP4)**

After careful consideration I am writing to set out my challenges to the two Plans which are not sound or deliverable. In addition, there is no justification for a number of the proposals and in other areas there is a lack of detail to substantiate how the Plans will be achieved. My comments, which have particular reference to South Warrington, are as follows: -

There is no clarity over the delivery of the necessary infrastructure to support the planned growth in housing and consequent increases in population and traffic. From previous experience, in the Chapelford development, there was a significant time lag following the building of houses before any social infrastructure was developed. It is not at all clear when, and indeed if, the necessary new roads, schools, medical facilities and local shopping centres would be provided to support the planned growth. The Local Plan has no costings and gives no explanation as to the possible site for a new household waste management facility for the enlarged South Warrington area or the potential sources of funding for community infrastructure, not to mention the extra resourcing needed for policing, social services, medical services and others.

Successful growth is also dependent on a sound transport plan, particularly given that South Warrington already suffers from serious congestion problems, notably due to geographic constraints associated with problems crossing the Manchester Ship Canal (MSC), River Mersey and Bridgewater Canal, and accessing the M56 at Junction 10 and the M6/M56 at the Lymm junction. The LTP4 has no real substance and details, but is rather a wish list of possible initiatives based on less car usage and increased numbers walking/cycling to work, a new mass transit system, and greater use of public transport, with no serious attempt to cost or justify them. It is totally unrealistic to expect that the vast majority of people living in South Warrington will be able to walk to work or even use public transport, since many currently commute out of town and it is highly likely that this will continue to be the case. In addition, how will a mass transit system be funded and realistically how long would such a system take to be fully operational? Questions which the LTP4 fails to answer satisfactorily.

There are no clear plans detailing how the existing MSC crossings can be expected to handle the vast majority of the hundreds of thousands of extra road journeys each year between South Warrington and the town centre, which would result from the proposals. It has proved virtually impossible to get Peel Holdings to undertake maintenance and painting of the Victorian swing bridges in recent years, and the only high-level bridge frequently needs resurfacing given the volume of traffic which uses it currently. 19<sup>th</sup> century infrastructure is not capable of handling 21<sup>st</sup> century traffic demands, but the Local Plan does not address this issue satisfactorily or with any confidence that it will actually be deliverable on the ground. Additionally, the Western link will only be of use to those people looking to get from South Warrington to the west of the town and no meaningful assessment has been carried out of the likely impact on the existing road network, with the likelihood that new bottlenecks will be created.

There is a significant lack of detail over the huge £multi-million infrastructure projects which would be required to support the Plans in their current form. Is it really feasible to build a new high-level bridge, shown as just a box on a map/suggestion of a bridge in the current Local Plan, next to the existing one at a time when the Ship Canal is in operation and traffic on it is increasing? Is the estimate of £50 million realistic to fund a new crossing? There are no proposals in the Plan to build any new crossings over the Bridgewater Canal, so substantially increased volumes of traffic would still be funnelled along the existing road network in South Warrington, primarily through the centre of Stockton Heath, Latchford and Lymm. Nor has any serious analysis of air quality impact been undertaken along the A49 and A50, with currently just one air quality monitor in South Warrington which only monitors NO2 and does not measure particulates. All the extra traffic will worsen pollution and the loss of open countryside close to the motorways might exacerbate this, as currently it allows gases and particulates to disperse

before reaching residential areas.

There are other new roads in South Warrington which appear as outline proposals in the Local Plan with the main one being a link road through Stretton, Pewterspear, Appleton Cross and Grappenhall Heyes, effectively joining the A49 and A50. Why is this road marked, in part at least, as dual carriageway? Is it a HGV link road, creating new rat runs along nearby roads and bringing lorries through residential areas? Once again there is no demonstration of where the money would come from to fund a dual carriageway. The whole town currently suffers whenever there are problems on the local motorway network, and with the level of growth envisaged in the Local Plan congestion would be particularly severe at J20 of the M6 and J10 of the M56 at such times, not to mention during every morning and evening rush as those living in the new developments head out to work elsewhere.

The argument that thousands of extra people will need housing in the borough because of all the extra jobs which are going to be created is unconvincing. In South Warrington the only proposed new jobs would come from the potential expansion in the Distribution Park between Appleton Thorn and the Lymm motorway junction. The jobs created there will be few in number, as warehousing and logistics are largely automated, and in the not too distant future even the distribution is likely to be in driverless lorries/vans. In addition, these jobs are likely to be for lower skilled workers who will probably have to commute from outside the South Warrington area.

The Local Plan is far too ambitious in terms of the number of new houses to be built and based on past experience it is neither realistic nor achievable. In terms of the numbers used the Plan is well beyond both official population increase projections and government housing targets, which are themselves likely to be reduced in future. It would require an average of 945 houses to be built each year and at the peak of development there would be a need to build 1656 houses in a year. When these figures are set against the current peak of just 545 houses, it is clear that they are unrealistic, unjustifiable and unachievable and I challenge the housing needs assessment on this basis. In addition, if developers are expected to provide funding towards the infrastructure needed to support the Plans, they will want to build higher value properties to help cover the costs. The knock-on effects will be a reduction in affordable homes and certain developments will no longer be viable, which again points to the Plans not being realistic or deliverable.

Given the above there is no need for the release of green belt land, it should be a last resort under exceptional circumstances and brownfield sites should be built on first. Indeed, the Local Plan does not meet several of the criteria for the release of land from the Green Belt, namely checking the unrestricted sprawl of large built-up areas, safeguarding the countryside from encroachment, preserving the setting and special character of historic settlements and assisting in urban regeneration, by encouraging the recycling of derelict and other urban land. The green belt and the historic villages of Walton, Moore, Stretton, Appleton Thorn, Grappenhall and Lymm, each with their own distinctive character, are of value to the whole borough not just the local communities of South Warrington, yet they would be subsumed into one large urban mass. The many woodlands and ponds are also of ecological value and the environmental impact of the loss of Green Belt has not been properly assessed. Finally, just because land is publicly owned, in this instance by Homes England, it is not a justification for releasing Green Belt for development.

In terms of employment and the release of Green Belt land for economic development once again the Local Plan offers no justification for the large-scale expansion it proposes. There is no evidence, nor is it backed by any meaningful economic strategy, for the future development of employment opportunities. As mentioned previously the numbers and types of jobs likely to be created, particularly in South Warrington, will be few in number and predominately lower skilled, with workers unlikely to be able to afford the houses to be built in the Garden Suburb. The growth plans seem to be driven by new housing creating economic benefit instead of the other way around, and no account has been taken of developments in Greater Manchester, Merseyside and Chester where currently significant numbers of people commute for work, shopping and leisure.

In conclusion, I challenge and call into question the figures which have been used to form the basis of the Plans, particularly in terms of the number of houses to be built which seem to drive many of the other proposals. It is clear that the Plans are not sound as they have not been properly prepared, do not provide adequate justification for the proposals they contain, are not consistent with national policy in terms of the excessive number of houses and the fact that they

cover 20 years, when they need only be for 15 years. There is no coherent economic strategy or evidence base to support the levels of growth, and as a result the Plans, as they currently stand, are unachievable and are not going to be effective at delivering what they set out to do. From all of the above, it is clear that the Local Plan and LTP4 contain widespread flaws and weaknesses and need to undergo significant changes in respect of following - the numbers of houses needed; the cost, delivery and funding of all the infrastructure required, with particular reference to new roads and river/canal crossings; the lack of substance and detail in the Local Plan and LTP4; the questionable evidence cited in support of economic growth and employment opportunities; and following on from all of this, the need for the release of significant tracts of Green Belt land when with revised figures brownfield sites should be prioritised first.

Yours sincerely

[Redacted signature block]