



Warrington



13th June 2019

Dear Sirs

I strongly object to the Local Plan and think it should be reconsidered immediately. I think it is unsound and undeliverable, logistically flawed and woefully incomplete; nor does it meet the five tests for special circumstances for release of Green Belt.

JUSTIFICATION

The planned number of homes is well beyond government housing targets. The housing numbers should have been revised as per the government's most recent 2016 advice, but they have not. To keep up with this demand, builders will have to build at a rate of almost 1000 homes per year. This is far more than WBC have ever overseen. I think it will be undeliverable and not even desirable from the builders' point of view. The laws of supply and demand dictate that if the market is flooded with houses, the builders will not be able to sell anywhere their optimum price and they will find ways to stall and disrupt the schedule.

The time frame for delivery is far too long. There is only a statutory requirement for a 15-year plan. There is no need to plan this far out. In today's uncertain political times with Brexit and the necessity to significantly reshape/rebuild our economy, it is difficult to see beyond the next five years, let alone the next twenty.

No guarantees have been given over prioritising brown field sites over green belt. Although the Plan states that there is a brown field site first policy, why is the plan for the Mass Transit route through the Garden Suburb within the next five years? This could possibly destroy Green Belt land for a housing development that never comes to fruition. Another example is Lymm green belt due for 2020 start – green belt should be the last to be built on, not first.

The planned development will destroy the character and distinctiveness (unchecked housing sprawl destroying unique character of each village) of South Warrington. Currently each village has its own character. After the building of the Garden Suburb, each village will have merged into the next.

Where is the case made for the release of green belt? I cannot see any special circumstances. The council have gone way over their housing target. If it stayed within limits set by the government, all housing could be met on brown field sites. Moreover, I don't see why Fiddlers Ferry has not been factored in for housing development. It will be decommissioned well within the life of the Local Plan, and should be explored as brown field potential.

I am not convinced about the economic plan to justify such large-scale expansion of the Town. The economic development seems very 'transport and logistics heavy', typically employing low skilled/low paid workers. A safer option would be to have a more mixed economic strategy, which would bring in a higher income earners to justify the low density/high value homes planned for the Garden Suburb.

SOUNDNESS

There are widespread flaws and weaknesses throughout the plan.

Lack of honesty over air quality - Warrington has the worst air quality in the whole of the UK for small particulate matter PM2.5 (WHO Air Quality Database 2018). This is the most damaging air pollutant as it gets deep into the lungs, heart and bloodstream. I would question the integrity and competence of a Council that supported an economic strategy which directly and heavily contributes to air pollution when it has a very poor record on air pollution. Further, I must question why this data has not been reported on or included in the Local Plan or its supporting documentation.

Plans are extremely vague on addressing the MSC issue. Any crossing, existing or new, will bear hundreds of thousands of extra crossings every year. I can't understand how they will be able to support these increased volumes. Nor can I see how any new crossings are any more than a wish list with some very sketchy numbers and costings. There are few details as to where, when or cost. This suggests to me that any new crossings are just a pipe dream and give a tantalising hope that the crossing of the MSC will be solved one day in the future, nothing more. The reality is that even more people will be affected by increased cars, more gridlock, standing traffic and exposure to air pollution. This is not just an inconvenience; this is a real health issue. The Local Plan states that in 2013 4.8% of all mortality in the town was attributable to man-made particulate pollution and is equivalent to 95 premature deaths. If you factor the increase year on year since 2013, this figure could now be significantly higher and set to rise.

There appears to be very little clarity over how infrastructure will be funded (roads, High School, GP surgeries etc). There are shortfalls in funding and on a practical level, severe shortfalls in staffing, both in the short, medium and long term. I think WBC need a reality check on how many GP's will actually want to come and live in a place like Warrington that will suffer from a severe lack of green belt, gridlocked by HGV's and cars, with one of the worst records in the country on air quality.

The growth strategy as outlined in the Plan is unconvincing. It is basically defined as an automated industry: warehousing and logistics which traditionally employ low skilled/low paid workers. At the very least this brings a problem about how these people get to work. Presumably they will be in the North of the Town, having to commute. I can't see most workers cycling to this employment area. It is a dangerous area, largely used by HGV's. Neither do I see that these are the workers will be able to afford even the cheapest homes in the Garden Suburb.

LOGISTICAL ISSUES

There is a shocking lack of detail over huge £multi-million infrastructure projects.

There is no credible plan for a new crossing to replace Victorian bridges over MSC. In the plan it's just a box on a map/suggestion of a bridge. How will this bridge be funded? This to me is a central question which needs answering BEFORE any building gets underway. If it is not a credible solution because of the sheer amount of logistical issues that must be addressed before any such project begins, is it really credible?

I can see no honest assessment on the impact of how Warrington Western Link will affect Walton/Chester Road. The amount of traffic that will be coming off the Daresbury expressway onto the WWL (what is described as a single carriageway) before it meanders its way over the Mersey and MSC, seems like an impossible situation. Given that there will be two extra sets of traffic lights on this stretch before traffic joins the Western Link, I just cannot see how this is going to work well.

I wish to question the reason for the new link road through the 'Garden Suburb' of Stretton, Pewterspear, Appleton Cross and Grappenhall Heys. I cannot understand why this road needs to be a 40-metre wide dual carriageway, otherwise called a mass transit route. It would be effectively become one of the widest roads in the entire Borough and it seems completely excessive for the needs of a Garden Suburb. My suspicion is, given that there is a spur off to the employment area (a logistics and distribution site), is it just a second route in and out for when the motorways are gridlocked? It would be an excellent selling point to potential customers that gridlocked motorways are not a problem and an alternative route is available. If this is not the case, why is this not stated? Where are the guarantees that this is not a major relief road for HGV's going directly through a 'Garden Suburb'? Also, why have these plans suddenly become only illustrative since the public consultation began?

Is it possible to build at such pace and scale in an area where people are living? To deliver on the scale necessary to achieve this plan, builders would have to build at a rate of 945 houses per year. This has never been achieved in Warrington before. The resulting logistical issues arising from this scale of house building is staggering. Residents will effectively be living in a colossal building site for the next 20 years.

DELIVERABILITY

Details within the Local Plan for infrastructure are flimsy and shockingly lacking in the necessary financial evaluation and analysis.

There is no demonstration of where the money is coming from to fund the 40m wide dual carriageway? Now, is it still 'illustrative'.

There is a lack of thoroughness over costings or attempts to explain funding for community infrastructure: High School, GP surgery, Supermarket.

£50 million is a totally unrealistic estimate for the funding of a new high-level bridge over the ship canal whilst still the ship canal is still in operation. The cost of building a new crossing is one thing, integrating that crossing into an area on either side of that crossing which is highly built up, will be astronomical. Compulsory purchase will be necessary, and unless the whole project is defined, quantified and costed at the outset, it will never be deliverable.

Can WBC realistically oversee levels between 945/1500 houses being built every year when the most they've ever overseen is 500 per year? Furthermore, I believe this building rate will not suit the builders themselves. They will effectively have to flood their own market with housing. Supply and demand dictate they will not sell houses if they do not get the best price for every house built. Their financial success is effectively built on rationing supply.

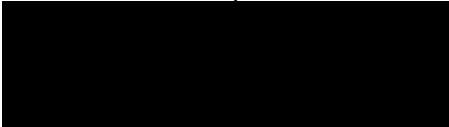
FINALLY, the plan doesn't meet the 5 criteria for a 'special circumstances' release from Green Belt.

- To check the unrestricted sprawl of large built-up areas – not met
- To assist in safeguarding the countryside from encroachment - not met
- To preserve the setting and special character of historic towns – not met
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – partially met
- To prevent neighbouring towns merging into one another – not met

After spending days and weeks researching the Local Plan and its supporting documentation, I think it will have a devastating effect on South Warrington. The Plan has changed negligibly since the PDO. WBC have not considered the views of the 4,500 people who objected originally strong enough to change the Plan in any meaningful way. It is opposed by our MP, it has widespread opposition from residents, groups representing residents, conservation groups and many subject matter experts. I find it embarrassing that

WBC have taken a politically vindictive approach to the Local Plan. I have heard comments from Officers such as and “get back to your traffic jams” and “it’s your turn”, even though this scale of building is unprecedented and unseen anywhere in the Borough. Councillors in the North of the Borough voted overwhelmingly for a Local Plan in which their own wards would be unaffected. Every Councillor who voted in favour of the Local Plan was from Warrington North Labour Wards. Every single abstention was a Councillor from a Warrington North Labour Ward where there is a small and contained amount of planned house building. For this reason, I feel the Local Plan itself is vindictive and uncovers an attitude of nothing-to-lose because there are no Labour-held seats in South Warrington. Adoption of this Plan will be to the detriment of our whole town.

Yours sincerely



Gerry Palmer
Parish Councillor, Appleton Thorn