

From: [REDACTED]
To: [Local Plan](#)
Subject: Local Plan response - Warrington and Halton Green Party
Date: 16 June 2019 22:09:29

Please see below a response to the Local Plan from Warrington and Halton Green Party.

In summary the Local Plan is not sound:

- it includes no justification for the predicted growth levels
- there is no justified need for the proposed housing and employment land
- there is no justified need for Greenbelt release
- there is no justified need for development which will harm air quality and the environment
- there is no justified need for development which destroys local character and distinctiveness
- there is not enough clarity over the means of delivery
- the period of the plan is too long and does not allow for revisions and review - for example, additional brownfield sites to become available

The plan is unsound for the following reasons:

- The plan period is 2 years longer than it needs to be to meet government requirements. This necessitates the unnecessary building of an additional 1,890 houses and the consequent loss of around 120 hectares of green belt.
- There is no justification for the predicted growth levels. Growth predictions are based on unrealistic economic forecasts and population projections. For example: If the 2016 population projections were used, there would be an increase in the local population to 2041 of 18,874. This equates to the need for only 343 homes per year rather than the 945 proposed.
- Consequently, due to the 2 points above, the number of houses is far too high and compounded by the addition of a 10% flexibility increase for which there is no need, as the Local Plan will be reviewed every 5 years. It is the lowest number of new houses possible that should be used in the development of the Plan.
- The overestimation in housing numbers has a significant impact on green belt land. Warrington will lose 11% of its green belt; the use of green belt should be a last resort after all other reasonable options have been examined.
- New homes should be affordable in relation to the types of jobs created; many of the new jobs created will be in distribution and logistics and there is likely to be a serious mismatch between the remuneration levels of the new jobs and the costs of the new housing being developed – staff will have to commute from other areas. 5,000 houses are being developed which will mainly be for commuters as there is little existing commercial activity in South Warrington that will provide new employment opportunities.
- Areas of Warrington such as Walton, Grappenhall, Appleton Thorn and Stretton will be completely changed in relation to their character and distinctiveness which is contrary to the 'vision for Warrington's future outlined in the Local Plan.
- The traffic infrastructure proposals are totally inadequate to alleviate the current problems of congestion, noise and pollution and also support the new housing and commercial developments. Specifically,
 - There is nothing planned to improve the A49 as it goes north from the M56 through Stockton Heath towards the Town Centre – it is already extremely congested and polluted!
 - There is no new crossing of the Manchester Ship Canal in South East Warrington > WBC are relying on the existing Victorian swing bridges despite the projected major increase in shipping traffic necessitating the bridges being closed much more often in future.
 - The Transport Plan does not provide any details of how the new public transport systems would cross the Manchester Ship Canal or the Bridgewater Canal.
 - around 5,000 daily car and HGV journeys associated with the Waterfront development via the Western Link; many people will use the Western Link rather than pay the tolls on the other 2 Mersey crossings. Traffic to/from South East Warrington using the Western Link via A56. The steep incline on the northbound Western Link, will mean that traffic will be in low gears (especially HGV's) and as the Western Link is single carriageway, the achieved speed will be that of the slowest.
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- The National Planning Policy Framework requires the Plan to be aspirational but deliverable. We do not believe this Plan is deliverable and is therefore unsound. The annual average delivery of 945 new houses is more than double the current build rates (359 in 2018/19). There is a peak build requirement of 1,656 houses in 2025/26 which we do not believe is achievable

or required.

- We do not believe the funding package to deliver the aspirations is achievable; while some money is available from Government for infrastructure, the bulk of the funding will need to come from the developers. The size of that funding requirement is unclear in the Plan as is the commitment of developers to deliver the necessary funding for infrastructure.
- Development is only acceptable with effective mitigation of its key impacts (traffic congestion, noise, air quality, education & health facilities, local amenities & the environment, as well as maintaining/improving quality of life), are properly planned and implemented before and during the building process but before completion.

The Plan is an inappropriate strategy that does not take into account the reasonable alternatives; it increases the population of the town rather than the prosperity of the existing residents. The scale of the additional number houses to be built is unnecessary because it quadruples the number of houses to be built in the borough compared to the previous version of the Local Plan that was successfully contested in court. Merely doubling the number of houses to be built would have staved off legal challenge and avoided building on the green belt to the detriment of the nature of the town. The additional traffic will increase pollution in the context of a town that is already failing to meet air quality standards.

Whilst accepting that Warrington has to grow and some development is needed, we do not accept the scale and nature of what is being proposed due to the profound negative impact it will have on the residents of Warrington in the future.

Regards

Stephanie Davies
Leader, Warrington and Halton Green Party
submitted on behalf of Warrington and Halton Green Party