



14<sup>th</sup> June 2019

Local Plan submission 2017-2037  
Planning Policy & Programmes  
Warrington Borough Council  
New Town House  
Warrington WA1 2NH

Dear Sir/Madam

### **Warrington Proposed Submission Version Local Plan 2017- 2037**

During the past few weeks I have read a full copy of the Warrington Proposed Submission Version Local Plan 2017-2037 (March 2019), attended sessions at the Halliwell Jones stadium, spoken at length with four WBC officers and attended a recent public meeting held by the Walton Parish Council.

My firm conclusions from my research is that the proposals put forward in the plan are not sound and that many of the proposals outlined are based on unrealistic economic forecasts, over-optimistic population growth forecasts, and over-aspirational and very poorly detailed solutions.

I fully accept that Warrington will, and should, continue to grow, and that this growth provides some great opportunities as well as specific and complex challenges. However, I do not accept the premise of the forecasts used to make the economic and population projections, and believe these exaggerate the housing build requirements and consequent impact on the Green Belt and Warrington's local communities.

The early sections of your report correctly outline many of the real issues that exist within the Borough:

- Housing affordability, particularly for young people, young families & the elderly (section 2.1.12)
- High levels of car ownership, above the national average, and the use of the car as the travel mode of choice within Warrington (section 2.1.57)
- Serious congestion within the town (section 2.1.58)
- Consequent pollution and air quality issues, and recognition that vehicles are a major contributing factor in the worsening health of Warrington's population (section 2.1.59)

However, the solution is not to build the majority of the proposed homes in South Warrington where house prices are **highest** in the Borough. This will not provide the large number of affordable homes for the young people and families identified in your report. With average house prices in Warrington already high at £187,471 (2017/18), and average prices significantly higher in South Warrington (£286,000 average in WA4 postcode in February 2019, source: Rightmove), building the majority of the new homes south of The Ship Canal will not deliver the on the 7,540 'affordable housing' objective stated in your report (section 4.1.32 "377 homes per annum between 2017 and 2037").

The majority of new homes should be built where new jobs are established and be affordable in relation to the types of jobs created in order to minimise commuting. This would thereby contribute to the stated objectives of reducing traffic, congestion, pollution and health problems.

The proposed new infrastructure for dealing with traffic is totally inadequate even for tackling the existing traffic problems in South Warrington, let alone the high number of car extra journeys created by the proposed new housing developments and additional HGV traffic generated by new and extended logistics facilities.

The proposed Western Link is single carriageway, which will severely limit its capacity, and given the gradients required to cross the Ship Canal, HGV's will be in low gear, slowing down the traffic and producing more harmful pollutants that will dissipate across the area.

There are no plans to provide a new high level road crossing of the Ship Canal in South East Warrington, and the retained land for potential replacement of the Cantilever Bridge does not include any land to link traffic into a wider network.

There are also no plans to alleviate the frequent and extreme congestion in Stockton Heath - a problem that will only get far worse if there were 9,000 more homes (and at least 18,000 more cars) built in the Garden Suburb and South West Urban Extension.

The challenges of emission reduction will become even greater now that the Government Advisory Committee on Climate Change has recommended the 'net zero' target. This will give WBC even tougher goals on emission reduction. Any residual emissions will need to be offset by existing and newly planted trees, the majority of which will have to be in our Green Belt areas – another strong reason for their preservation.

The exciting and innovative transport plan is no more than a planner's illusion. There are no details of how adequate routes would be created, how the systems would cross The Ship and Bridgewater Canals, and where any money would come from to fund such a system.

The report acknowledges that adequate infrastructure has not been put in place before new development in the past (section 3.1.3). Development is only acceptable if its main impacts are planned and implemented before and during the process, and certainly before completion. Mitigation in areas such as traffic congestion, air quality, education, health, social care, local amenities, and the environment must all be adequately planned, funded and implemented fully during the building phase.

In summary, I have concerns about the optimism of the economic and population forecasts, the consequent number of homes proposed, and the locations selected. I believe in the sanctity of the Green Belt. Green Belts have been established for a very sound set of purposes, which are as valid today as when first proposed. There is no need for Green Belt release. The plans for improving public transportation are sketchy, unrealistic and unfunded.

I do not believe that the proposals brought forward in the Proposed Local Plan are sound. The NPPF requires the Plan to be aspirational but deliverable. There is insufficient evidence in the Plan, from WBC officers, and from wider research to support that principle at this stage.

Yours Sincerely

Alan Palmer

P.S. I trust that WBC will respond more effectively to the consultation on Warrington Local Plan than they have done so far to the 4,500 representations made to the Preferred Development Option earlier this year.