

16<sup>th</sup> June 2019.

Dear Sir/Madam,

Re: Proposed Submission Version Local Plan with particular reference to the South East Garden Suburb.

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I am writing as a local resident of [REDACTED] Warrington. I have attended two of the public consultation events to try to fully understand the justifications, feasibility and potential implications of the proposed plan.

I appreciate the need to invest in Warrington and to increase the housing provision, however I have concerns about some specific elements of the proposed plan, particularly around the deliverability of the numbers of houses and associated infrastructure and the justification for the amount of Green Belt release.

① Validity of Growth Prediction.

The plan is needed for 10-15 years, yet you have chosen a 20 year period during which time circumstances may well have changed.

The Population predictions for the New Town strategy to increase the population from approximately 120,000 in 1973 to 200,000 by the year 2,000 were not fully achieved, (Para. 2.1.10) yet you are planning for a level of housing provision 4% above the Government's minimum requirement, (Para. 3.2.6). In addition you are also proposing an extra 2,300 houses for the Garden Suburb beyond the Plan period, (Para. 4.1.24).

Similarly the scale of economic growth predicted by the Cheshire and Warrington Local Enterprises Partnership and the Council's own growth aspirations are arguably unrealistic, (Para. 4.1.8)

## ② Deliverability of Houses and Associated Infrastructure.

The excessive number of houses planned for South Warrington, much of it on Green Belt land, will have a detrimental effect on the whole of South Warrington due to increased traffic. The roads are already at capacity at peak times and when the Swing Bridges open. These problems are compounded when there are difficulties on the surrounding motorways, which happens frequently.

Plans for a new road linking the A49 and A50 will only exacerbate congestion on these roads. Stockton Heath is a traditional centre with a standard of environmental quality which will be damaged by large traffic increases.

There are no firm plans to improve South-North routes. When I spoke to someone who works on the Local Transport Plan about this, he said that currently no new bridge was needed for this side of Warrington. This is because many people from the Garden Suburb would be using the motorway network to commute to Manchester and Liverpool. Yet the Plan sets out that the development of the Garden Suburb is needed to support economic growth in Warrington.

Much is made in the Plan of efforts to reduce car use, encourage cycling, walking and increase the use of Public transport. A Mass Transport System is proposed for some unspecified time in the future. These are all aspirations, with no clear means of achieving and funding these proposals.

### ③ Justification for Green Belt Release.

The Plan maintains that the Green Belt release is a requirement to ensure sufficient land is provided to meet Warrington's development needs..... The Housing requirement will ensure issues of affordability are addressed and that sufficient houses are provided to support the planned level of economic growth, (Para. 3.4.7). The N.P.P.F. states that "Very Special Circumstances" are required to release Green Belt.

However the proposals do not meet 4 of The 5 criteria justifying release from the Green Belt, namely :-

- a) to check the unrestricted sprawl of large built-up areas.
- b) to help safeguard the countryside from encroachment.
- c) to help preserve the setting and special character of historic towns (e.g. Crappenhall Village which has not been allocated as an inset).
- d) to help urban regeneration by encouraging the use of Brownfield sites,
- e) <sup>but</sup> it will prevent neighbouring towns merging into one another.

As regards d) Brownfield sites, I am aware that a date of March 2020 has just been announced for the closure of Fiddlers Ferry. I appreciate that redevelopment of the site will not be quick due to its challenging nature. However as the closure date now ties in with the implementation of the plan, greater consideration needs to be given to its potential. This significantly increases the area of Brownfield land available for industrial development and may reduce the potential requirement for Green Belt release for industrial purposes. (Para. 4.2.24 - 4.2.29, especially Para. 4.2.28 "There is not currently therefore sufficient certainty for the site to be included.")

④ Conclusion.

I accept that new housing is required and that some of it will need to be built in South Warrington. However the scale of building proposed together with the lack of concrete transport infrastructure proposals, nor any certainty the money to fund transport improvements will be forthcoming, mean that the Plan in its present form is not sound, justifiable nor deliverable.

Yours faithfully,



MRS. CATHERINE J. CUMBERLAND,