

Robert Pearson



10 June 2019

Local Plan
Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington WA1 2NH

Re Proposed Submission Version Local Plan

Dear Sir/Madam

Comments on the above Local Plan follow, from which it is concluded that the Plan is not sound.

I would be grateful if these comments can be considered in any further developments of the Local Plan.

Yours faithfully,



Robert Pearson

1. Improve Walking and Cycling facilities

In NPPF 2019, section 9 paragraph 104 d) states - *'provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).'*

In the WBC Local Plan Report, Objective W4, section 7.1 - Policy INF1, item 2 paras a to f, there is a list of objectives to be considered.

Considering the Local Plan is to the year 2037, one would expect some specific proposals relating to the Warrington area as a whole; rather than the generic points referenced in the previous paragraph, which in essence restate the principles of NPPF 2019.

Yet reference to the Warrington Transport Model, Figure 70 and section 5.3.3 - 'Walk' refer only to a small area in the centre of town. There is no reference to cycling provisions.

With the Local Plan major housing proposals in the south of Warrington, consideration should be given, for example, as to how cyclists could be encouraged to cycle safely along designated routes to the town centre.

2. Transport Infrastructure

WBC Transport Modelling - there are no defined highway routes and canal crossings and no indication as how the dual carriageway is to be funded. Also at the M56 (J10), M6 (J20); along A49 - Stretton; along A57 - West; along A56 - Grappenhall, even with the road improvement proposals, the Warrington Transport Model Report shows that traffic delays are to become worse.

Victorian Swing Bridges - Despite pressure from WBC and from Faisal Rashid, there appears to be no firm programme of 'repainting' from Peel Ports for the 3 swing bridges over the Manchester Ship Canal - on Chester road, London road and Knutsford road. It is understood that 6 months is required for each bridge and total closure.

Meanwhile the already evident very significant steelwork corrosion worsens; and it may be that when work commences structural repair is also needed in addition to the 'repainting' and perhaps work also to the mechanical systems - which would increase the 6 month timescales.

Thus if carried out sequentially the 'repainting' of the bridges would take say 2 years during which time local traffic would be chaotic, particularly around the bridges on the Chester and London roads. For pedestrians and cyclists not being able to cross would make life very difficult! Peel Ports should be urged to undertake the 'repainting' work as soon as possible and **before** house building in the south of Warrington commences - otherwise increasing traffic congestion and worsening delays (as noted above - paragraph re Transport Modelling) would become unmanageable.

Equally important to this, it is recommended that Peel Ports should be asked to give their best estimate **now** regarding the expected remaining life of the bridges. If replacement is needed in the next 10 to 20 years it could have a dramatic affect on the current WBC Transport proposals because replacing the bridges could take much longer than 'repainting', with the consequential effect local traffic.

3. Brownfield Sites and Green Belt

The WBC Brownfield Site Register, on which aspects of the Proposed Submission Version Local Plan are based, has to be considered as being **out of date**. Regulation 17 of Regulations 2017 Town and Country Planning (Brownfield Land Register) requires a Register to be updated at least annually. It is believed that the latest WBC Register available is dated 24 October 2017. Thus site data derived from this Register may be inaccurate and is almost certainly incomplete.

Also, from historical data trends, predictions can be made as to extra brownfield sites likely to become available in the next 10 to 20 years in the Warrington area. The findings of such predictions should be incorporated.

As required by clause 119 NPPF 2019, there is no evidence that WBC have taken ‘a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full powers (compulsory purchase) available to them.’

As required by clause 137 NPPF 2019, there is no evidence that to justify the proposed changes to Green Belt Boundaries WBC ‘makes as much use as possible of suitable brownfield sites and under-utilised land.’

Finally, as required by clause 136 NPPF 2019 ‘Once established, Green Belt boundaries should only be altered where **exceptional circumstances are fully evidenced and justified**, through the preparation or updating of plans. Strategic

The Proposed Submission Version Local Plan does not demonstrate that this NPPF requirement has been met.

Housing Numbers

The number of houses ‘required’ in the Plan is too high. Derivation of these numbers by WBC is at best obscure. The Government figure of 909 per year is considered too high. However WBC have chosen a figure in excess of this, ie 945 per year without adequate explanation. Nor have they made adequate provision to tackle the national shortage of ‘affordable’ housing. Building in South Warrington will not provide the type of housing required as house prices tend to be higher.