



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

Dear Sirs

Warrington Proposed Submission Version Local Plan 2017- 2037

I do *not* believe that the proposals contained in the above document are sound. Whilst accepting that Warrington has to grow and some development is needed, I do *not* accept the scale and nature of what is being proposed by WBC due to the profound negative impact it will have on the residents of South Warrington in the future. Instead of improving the quality of our lives, the proposals will cause serious deterioration.

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 level of **Housing Numbers** are 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. I believe the lowest number of new houses possible should be used in the development of the local plan.
- The overestimation in housing numbers has a significant impact in increasing the need to build on **Green Belt**. Warrington will lose 11% of its Green Belt, virtually all of it in South Warrington – this is unnecessary and disproportionately spread across the Borough. I believe the loss of Green Belt, if any is really required, should be spread more evenly and be a last resort after all other reasonable options have been examined.
- The **location** of new homes should be where the new jobs are being created to minimise commuting, and also be **affordable** in relation to the types of jobs created. This is *not* the case in relation to South Warrington:-
 - The 1,600 houses at Walton will all be for commuters as there is *no* new employment in that area.
 - The new jobs created near the 'Garden Suburb' will be mainly distribution and logistics related 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.
- The villages of 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** in South Warrington and also support the new housing and commercial developments.
 - The 'Garden Suburb' will have 5,000 new houses with consequent daily car journeys of around 10,000:-
 - 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.
 - The already congested and polluted A56 will need to support and contend with:-
 - around 7,000 daily car journeys emanating from the Walton Development and the new houses Halton Borough will be building near the A56.
 - 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 new Western Link junction plus the 2/3 other new junctions needed to access the Walton housing development, will cause the traffic to *stop and start* continuously between Walton Village lights and the Western Link junction.
 - 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.
 - The National Planning Policy Framework requires the Plan to be aspirational but **deliverable**. I 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 I do not believe is achievable. Developers will only build houses if they believe they can be sold, so the control on the rate of building does not lie with WBC but with the developers.
 - 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 the *effective mitigation* of its key impacts (traffic congestion, noise, air quality, education & health facilities, local amenities & the environment, as well as maintaining / improving our quality of life), are *properly planned and implemented before and during the building process but before completion*.

Yours Sincerely,

Dr Stephen Guilfoyle