[redacted]

Local Plan

Planning Policy and 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.

It is accepted 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 - it is not positively prepared, justified, effective or consistent with National Policy for the following reasons:

Housing Figures

- 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 further loss of an additional 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 further compounded by the addition of a 10% flexibility increase for which there is absolutely no need. This does not meet the exceptional circumstance test to release land from the Green Belt. 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 to ensure the minimum release of Green Belt land and retain the opportunity to allocate brown field land elsewhere when it becomes available during the plan period.

Large Scale Land Release in South Warrington

- The justification for all the release to be in South Warrington is flawed and therefore unsound. In discussing the reason land cannot be released from the Green Belt elsewhere in the Borough, for

example in the north, it refers to adverse effect upon the A49 and M62 and yet fails to consider these matters in relation to the Chester Road and London Road crossings of the Canal. (The lack of infrastructure improvements is detailed below).

- 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. The 5,000 houses being developed 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 This loss of character and distinctiveness has been ignored in justifying wholesale land release in south Warrington and yet used as a justification for <u>not</u> releasing land elsewhere in relation to Winwick, for example.

<u>Lack of Infrastructure</u>

- The **traffic infrastructure** proposals are not enough to alleviate the <u>current</u> problems of **congestion, noise** and **pollution** in South Warrington and are totally inadequate to also support the substantial new housing and commercial developments proposed.

- The 'Garden Suburb' will have 5,000 new houses with consequent daily car journeys of at least 10,000, and increasingly households have one car per adult inhabitant:

  - 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 and has no ability to add for example a dedicated public transport lane.
  - The Plan indicates that subsequent phased release of housing land in the "Garden Suburb" should not come forward until the "*strategic*" link is detailed. The so called "strategic" link runs east to west across the Garden Suburb between x2 single carriageway roads.
  - 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 just vaguely states that residents will enjoy public transport links with the town centre!

- The already congested and polluted A56 will need to support and contend with:

  - around 7,000 daily car journeys emanating from the Walton Development as well as 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.

Inconsistent with National Policy – Unsound

- 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 full and 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 faithfully,

[redacted]

Mark Hughes MBE

8th June 2019