



14<sup>th</sup> June 2019

Local Plan  
Warrington Borough Council  
New town House  
WA1 2NH

Dear Sir or Madam,

I am writing to object to Warrington Borough Council's Local Plan to redevelop South Warrington and bring thousands of new homes to the area.

There are a number of reasons for my objection, which I have set out in sections below so I can address each clearly and demonstrate that the proposal is not only significantly detrimental to the area, but also wholly **undeliverable and unsound**.

Not only would it destroy Warrington's valuable Greenbelt land, it would ruin the character of its picturesque villages, cause severe traffic, result in infrastructure problems for residents, and potentially damage the health of those already living here – as well as those intending to buy houses in the new developments.

I believe the plan would completely transform South Warrington for the worse, and given that each component of the proposal seems unsupported, residents can only assume its intention is merely to create more tax-generating properties for the council without any regard to those who call the area home.

Here are my main objections, all of which are substantiated.

#### **- Unnecessary Number of Houses Being Proposed**

The plan intends to build 945 properties per year, peaking at as many as 1,600 per annum. However, official population predictions for the area are just 528 per year. Even the government's suggested figures of 909 per year are too steep, and the council has gone beyond this without any reasoning behind this.

The growth predictions have been based on unrealistic levels of development, of which have not occurred previously and, therefore, there is no reason to believe they will in the future. Therefore, this estimation of such high demand is unfounded and unsound.

The proposal is set out until 2037; however, it is impossible to predict what will happen during this period and how demand for housing may be affected over the next 18 years. For instance, Brexit could have a significant impact on population growth, with a huge reduction in the number of people from the European Union living in the UK over the next two decades. Therefore, requirement for new housing could actually decline, rather than increase during this time.

In addition to this, the new properties are unlikely to serve a huge number of people, as developers are only required to build a maximum of 30 per cent of affordable homes. South Warrington is an affluent area, and as a result, houses are not cheap. According to [Rightmove](#), properties in Appleton were £504,654 on average during 2018, with the majority of sales being detached residences.

Therefore, most of the newbuild properties are either going to be unaffordable for the thousands of people who need to fill them, or they will reduce the value of residents' existing properties, having a hugely negative impact on the local economy.

Warrington has a poor history of delivering houses, and the maximum rate it has produced in the past is fewer than 550 per year. Therefore, the aim to build 1,600 at its peak is unrealistic, and worrisome. It begs the question whether there is the staff to oversee such a level of housebuilding in the area when it is three times more than they have achieved before.

It also seems counterintuitive to build properties to create an economic benefit to the local area, rather than improving the infrastructure and facilities in the area first, which will, in turn, create a demand for more homes organically.

#### **- Lack of infrastructure**

This brings me on to my next point that there will be a complete lack of infrastructure to cater for the demands of thousands of new residents.

Local schools, medical facilities, shopping centres, leisure centres, convenience stores, petrol stations and so on are already overstretched in South Warrington, but the influx of more residents at such a fast rate will overload the existing services.

While there is suggestion these have been considered in LPT4, there is no substance or details to these plans. There is a lack of information when it comes to how and when new healthcare centres, schools, roads, hospitals, GPs and so on will be built and financed, leading to residents to believe they simply cannot be provided at all. This is another aspect of the plan that is completely undeliverable.

There is nowhere that stipulates where the finance would come from to build the necessary infrastructure; no details about the regeneration of the town centre; no plans to preserve the identity and character of the villages; no thought given to how families with children – which will be the vast majority of existing and new residents in South Warrington – will be able to send their kids to school.

Local primary schools are already at capacity, while there is only one secondary school (Bridgewater High) that already serves Grappenhall, Appleton, Stretton, Stockton Heath, Hatton and beyond. It currently holds 1,500 pupils, and its sixth-form years (Appleton College) is [actually closing in August 2019](#), meaning there will be no local education facilities for those who want to further their studies beyond GCSEs.

As a parent of two young children, I worry that they will be unable to secure a place in their local school but also have to compete for college places a long distance away due to the lack of resources in the area.

In addition to the problems children are likely to face finding school places, there is a lack of information given with regards to employment opportunities for those thousands of people moving to South Warrington.

While the warehouses and industrial sites will produce jobs, those working there are unlikely to be able to afford the houses that will be put up for sale locally, given the steep property values of the area that I mentioned previously. Again, this makes the Local Plan unsound and unreliable.

#### **- Disastrous traffic problems**

They will, therefore, have to rely on commuting from outside of the area. This will have a huge impact on traffic, with thousands more commuters trying to access South Warrington via its motorway routes.

The lack of appreciation for the current traffic problems in South Warrington is demonstrated in the ambiguity of the council's transport plans to deal with the addition of thousands of more residents and construction employees, as well as large vehicles involved in the building works on the roads.

A sound transport plan is an urgent necessity, but the Draft Transport Plan has no substance, with a lack of clarity on how the work will be carried out, what the changes will be, and most importantly, who will fund it.

As well as more workers travelling to the area, there will be heavy goods vehicles (HGVs) and thousands of more residents placing demands on the existing road structure. Despite this, there is no proposal about how people will go into town, no intentions to improve the A49 – which is already often congested – and no clear routes for canal crossings, highways or motorway junctions.

The Warrington Western Link is not likely to help, as it will bring traffic to existing bottlenecks, as well as adding more congestion to people avoiding the toll roads on the Mersey Gate crossings. There is also no clear analysis about how this route will impact Walton / Chester Roads.

In fact, the only firm proposal is for a new wide dual carriageway to run parallel to the M56 linking the Barley Castle industrial estate to Junction 10. However, this suggests this is mainly to be used for HGVs for the housing developments and not for the benefit of residents. There is also no demonstration where the finance is coming from for this road.

South Warrington already has a severe traffic problem, and instead of finding ways to improve congestion, the council is merely exacerbating it. The road network is currently struggling to cope with demand, demonstrated by local MP Faisal Rashid's [recent traffic survey](#) on the area.

The existing problem of congestion is so bad, Mr Rashid stated: *"I am regularly contacted by constituents who tell me they are fed-up with the intolerable levels of traffic congestion in Warrington South. The local road and motorway network is already at the point of gridlock during peak times. If there is an incident on the surrounding motorway network, local roads*

*come to a standstill. Traffic congestion is leading to significant delays – even for motorists travelling very short distances.”*

One of the main reasons for traffic problems in the area is the reliance on Victorian bridges to cross the Manchester Ship Canal (MSC). Waterways require bridges, and there are only a few available crossings from South Warrington into the town centre, resulting in huge bottlenecks at any time of the day, and particularly during peak commuting hours.

Indeed, as the new homes are far from both Warrington’s railway stations, this will result in cars having to drive through the town and over the waterway, causing more traffic in these areas.

While the council has proposed the £50 million high-level Cantilever Bridge over the MSC, this is completely unrealistic. Firstly, it would not be covered by the cost of the housing that would need to be purchased, and secondly, it is impractical for this to be built while the ship canal is still operational.

There is no realistic plan – or proposals for funding – for a new crossing to replace the existing old ones, suggesting the council has not given any consideration into how residents are meant to cope with the thousands of extra vehicles on the road.

Interestingly, the issue of congestion is not the same throughout Warrington, but especially prevalent below the MSC. Therefore, it is unclear why areas in the north, east and west are not being considered for redevelopment in the same way as South Warrington is.

With already existing traffic problems in the area, it seems incredulous the council would propose to worsen the daily commute – and stress levels – of all its residents.

#### **- Destruction of valuable Greenbelt land**

Perhaps the most disturbing proposal Warrington Borough Council has come out with is the destruction of 600 acres of beautiful Greenbelt land.

The intention to reduce the area’s Greenbelt land by 11 per cent – all of which is targeted in South Warrington – is devastating given the lack of justification for doing so.

Firstly, there are available brownfield sites in the area that can – and should – be utilised prior to destroying the local landscape, with the council providing no case for why Greenbelt should be used before Brownbelt.

For instance, [Fiddlers Ferry Power Station](#) is set to be shut down by March 2020, providing ample Brownfield space for housing.

Secondly, there is plenty of land available throughout the borough to spread the development out more evenly. However, it is being predominantly focused on South Warrington, completely altering the landscape and character of the area.

In order for Greenbelt land to be developed on, the local authority [needs to prove there are “exceptional circumstances”](#), according to the CPRE.

To this end, it has to meet five criteria for release of Greenbelt land, including 1) To check the unrestricted sprawl of large built-up areas; 2) To assist in safeguarding the countryside from encroachment; 3) To preserve the setting and special character of historic towns; 4) To assist in urban regeneration by encouraging recycling of derelict and other urban land; and 5) To prevent neighbouring towns merging into one another.

However, the council has failed to meet these criteria, and therefore, it is unjustified in wanting to build 4,200 properties on Greenbelt in the Garden Suburb, as well as giant warehousing facilities here.

There is no need for the scale of Greenbelt release, particularly with the unsubstantiated prediction of population growth. As 20 years is too far ahead to plan, more brownfield sites could become available during this period to satisfy the scale of the development.

What's more, it opposes the government's recent overhaul of the [National Planning Policy Framework](#), which states properties will be built in Britain "while maintaining strong protection for the Greenbelt".

*The Ministry of Housing, Communities & Local Government stated: "Ensuring developments result in a net gain to the environment where possible and increases the protection given to ancient woodland so they are not lost for future generations."*

#### **- Air quality decline and environmental impact**

By destroying such valuable Greenbelt land in the area, the council risks a huge environmental and ecological impact. The loss of habitat, the death of thousands of animals, the destruction of the village character, and the devastation of the landscape is not addressed in the proposal, despite having a huge impact on those living here.

Even if the council does not consider the environment to be a big factor in its proposal, the massive drop in air quality this plan will have should be of paramount importance.

Thanks to extra traffic on the roads, an increase in pollution on the motorways due to more commuters, and the absence of open countryside – which currently allows gases to disperse – air quality in Warrington will decline quickly.

Despite this, the local authority does not address this issue and offers no serious analysis of air quality impact. Its one air quality monitor in South Warrington only assesses NO<sub>2</sub> and does not even measure particulates. Therefore, it is an unreliable source of information and cannot be used in an argument in favour of the proposals.

Warrington already suffers from very poor air quality, something which it has even [admitted on its website](#).

*"In 2015, around 4% of all mortality in Warrington was attributable to man-made particulate pollution, the [Air Quality and Health JSNA, Feb 2018 report \[pdf\]](#) has more detail.*

*Whilst the majority of Warrington has good air quality, there are areas close to major roads where nitrogen dioxide levels are high and exceed national standards."*

In 2016, Warrington was even picked out by the World Health Organisation (WHO) as the second worst place in the north-west of England for its air quality. Breaching safe levels of small particulates in the air (PM2.5), its pollution levels even came to the attention of local councillors at the time.

*Councillor Maureen McLaughlin, executive board member for public health and wellbeing, was reported [by Warrington Worldwide](#) as saying: "Warrington Borough Council takes its responsibility for the health and wellbeing of its residents extremely seriously. We remain determined to tackle the causes of ill health in the borough and that includes air pollution."*

While Warrington Council appears to have now backtracked on its commitment to reducing air pollution in the town, this contradicts recent targets set by Prime Minister Theresa May.

Just this week, she revealed plans to [cut greenhouses gases to zero by 2050](#). This will not be possible if the new proposals in Warrington go ahead, as air quality will actually decline – not improve – as a result of the building work.

#### **- Undeliverable**

On the whole, the Local Plan completely lacks substance in important areas. There is no explanation about how transport routes, essential services, and infrastructure will be financed and delivered.

The housing numbers are unrealistic, particularly while people are residing in the area and before suitable infrastructure is in place to support new residents.

This plan will require resources, organisation and development over and above anything Warrington has achieved in the past – and yet, it is already unable to provide the required services that existing residents require, including better air quality, improved access to healthcare, and reduced traffic on the roads.

The lack of clarity from the local authority regarding how it intends to deliver the plan makes it **irresponsible** to go ahead with it. Not only will it destroy a beautiful part of the country, but it will have a detrimental impact on the quality of life to all residents – both existing and new – **detering people from living here**, instead of attracting them.

Without a sound, reliable and supported proposal – which the council does not have – this is simply **negligent** to everyone who lives here.

I repeat: the **plan is not sound, undeliverable, and unjustified**.

Regards,

Natasha Holdsworth

Here are my sources to support my objection.

**Sources:**

<http://bridgewaterhigh.org/wp-content/uploads/2017/09/Consultation-to-Close-Appleton-College.pdf>

<https://www.bbc.co.uk/newsround/48605993>

<https://www.cpre.org.uk/what-we-do/housing-and-planning/green-belts>

<https://www.gov.uk/government/news/prime-minister-launches-new-planning-rules-to-get-england-delivering-homes-for-everyone>

[https://www.warrington-worldwide.co.uk/2019/06/13/goverment-throws-a-spanner-in-the-works-of-warringtons-local-plan/?fbclid=IwAR1k0v9zeJtj8TUXisuQxbkJspl6OeOIP-1DeBZG6YwLlv2wD3fAwD0wY\\_w](https://www.warrington-worldwide.co.uk/2019/06/13/goverment-throws-a-spanner-in-the-works-of-warringtons-local-plan/?fbclid=IwAR1k0v9zeJtj8TUXisuQxbkJspl6OeOIP-1DeBZG6YwLlv2wD3fAwD0wY_w)

<https://www.rightmove.co.uk/house-prices/Appleton.html>

<https://www.warrington.gov.uk/info/201090/environmental-issues/2024/air-quality-and-pollution>

<https://www.warrington-worldwide.co.uk/2016/05/17/warrington-named-and-shamed-for-air-pollution/>

<https://faisalrashid.com/traffic-survey-2019-release-pr/>

<https://www.who.int/air-pollution/news-and-events/how-air-pollution-is-destroying-our-health>

[https://www.warringtonguardian.co.uk/news/17704557.fiddlers-ferry-power-station-to-close-in-2020-sse-announces/?fbclid=IwARorUoUuNyIRtFrvVlwT6aNe\\_LWl6TIRAxMLHztg2zEngg\\_WBboyJWUCiml](https://www.warringtonguardian.co.uk/news/17704557.fiddlers-ferry-power-station-to-close-in-2020-sse-announces/?fbclid=IwARorUoUuNyIRtFrvVlwT6aNe_LWl6TIRAxMLHztg2zEngg_WBboyJWUCiml)

[announces/?fbclid=IwARorUoUuNyIRtFrvVlwT6aNe\\_LWl6TIRAxMLHztg2zEngg\\_WBboyJWUCiml](https://www.warringtonguardian.co.uk/news/17704557.fiddlers-ferry-power-station-to-close-in-2020-sse-announces/?fbclid=IwARorUoUuNyIRtFrvVlwT6aNe_LWl6TIRAxMLHztg2zEngg_WBboyJWUCiml)