

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Subject:** Local Plan Objection  
**Date:** 16 June 2019 18:08:07

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16<sup>th</sup> June 2019

## **Warrington PSV Local Plan**

Dear Sir/Madam

I am writing to voice my strong objection to the PSV Local Plan that you recently published. I believe that the data you have used and assumptions you have made are unsound and without justification. This leads me to the conclusion that it is not fit for its declared purpose and is undeliverable.

### **Housing Requirement**

I believe that the Plan's use of the 2014 population projections, which have since been revised to show a much smaller rise in our population, is unsound. By using the 2014 figure the proposed housing requirement has been artificially inflated and therefore cannot be justified. The numbers of houses to be built should reflect the 2016 figures.

In addition, the priority for the type of houses to be built should reflect the age profile of our population. This means more homes for younger and older people that are affordable and very few larger homes (likely to be built on greenfield sites) which are more likely to be lived in by out of town commuters. Developers should be required to ensure more than 30% of new properties are affordable.

The numbers of new homes the plan says need to be built every year is unrealistic and has never been achieved. This places serious doubt as to whether the plan is deliverable.

By insisting that the plan should run for a 20-year time frame from 2017 is now already behind schedule on delivery of the planned housing numbers. Warrington history of delivering new builds means with every passing day the plan becomes increasingly deliverable.

The plan is unsound as it makes no allowance for changes in local circumstances e.g the announcement that Fiddler's Ferry is to close in 2020 has now potentially released a significant amount of brown field land that should be included in the plan. It is not unreasonable to expect the Hospital site to be released within the next 15 years and by

not including this, or considering it as an option, WBC have failed to properly justify the level of Green Belt land they intend to release.

### **Greenbelt**

The plan fails to justify its proposed release of Greenbelt. The environmental and ecological impact of losing 600 acres of Greenbelt in such a concentrated area of the town has not been properly assessed and is therefore unsound. The assessment of Greenbelt strength by ARUP was weakened by its use of the information provided to the council by its earlier “call for sites” and therefore cannot be justified.

The plan does not demonstrate the exceptional circumstances required to demonstrate the release of Greenbelt. The proposed new employment land at Barley Castle and Junction 20 of the M6 will provide mainly poorly paid employment with a small number of technology type jobs. This will not provide the type of economic benefit required to justify Green Belt release.

The siting of so many potential houses across the south of the town, and in particular in the proposed Garden Village (a somewhat ironic title since it is all open countryside), will completely infill the land between historic villages like Appleton Cross and Grappenhall creating urban sprawl from the centre of Warrington to the boundary with the south of Cheshire. This will destroy the character and distinctiveness of these villages too. For this reason, the plan is unsound.

There is little evidence that the plan has properly considered the plans of adjoining authorities which further undermines the proposed release of Greenbelt.

### **Infrastructure**

The proposed development of employment in the South of the Town, Peel Port and the construction of the proposed 18.5K new homes will place an unsustainable extra demand upon the existing infrastructure.

Warrington suffers from the constraints of the need to cross the Bridgewater Canal, Manchester Ship Canal and Mersey . There are too few crossings many of which are reliant upon 19<sup>th</sup> century swing bridges which are poorly maintained and frequently break down. This makes the plan in its current form undeliverable as the infrastructure will be unable to absorb additional demand.

This small number of crossings prevents free movement of traffic leading to high levels of congestion and poor air quality.

Both the Local Plan and Local Transport Plan 4 fail to provide sufficient detail about costs, funding sources and timescales of potential infrastructure. Roads are only one part of this as schools, health centres, and community facilities will be required. The funding of these is not all within the control of WBC and as such the plan is unsound.

The scale of infrastructure required, which the plan infers will be met by developers, is so large that I understand a 60K levy per household will be required. This is unsound particularly as infrastructure will be required upfront before developers build houses 15 years from now.

### **Air Pollution**

The World Health Organisation says that Warrington had the worst rate of small particulates in the UK for PM2.5 in 2018. The town is already overly reliant upon cars to move its population around and to and from the town. Being encircled by the M6, M56 and M62 results in frequent gridlock resulting in very poor air quality. The council itself stated in its Air Quality Plan that In Warrington in 2013, 4.8% of all deaths were caused by man-made particulate pollution in our air, which is equal to 95 unnecessary deaths a year. This is only likely to get worse.

We note that in 2013 cars in Warrington accounted for 90% of distance driven whilst contributing 61% of NOx whilst buses despite only accounted for 1% of distance travelled & contributed 11% of NOx.

The anticipated 15K extra HGV movements per 24 hours and 20K + car journeys per day linked to housing are highly likely to increase the pressure on local NHS services due to poorer air quality. I do not believe that the reliance upon logistics and such large numbers of houses, which will generate significant extra congestion and reduction of air quality is sustainable or sound. Government policy is moving towards reducing the impact of vehicles on our environment WBCs transport and local plans are totally reliant on increasing vehicle use and are therefore unjustified and unsustainable.

The Greenbelt to the South of the town, is currently all green space and much of it high grade agricultural land. It is an important contributor to improving our air quality. It's almost total removal for employment land and housing is unjustified as its loss will negatively impact on our air quality.

**Summary** The Local Plan is unsound as it has proposed the building of housing numbers that do not reflect realistic population projections and rely upon an unrealistic expectation delivery of construction which is considerably higher than the town has ever previously achieved.

The details about funding for roads and other infrastructure are insufficient in the plan and unrealistically linked to the need for developers to fund them in advance of houses being built. This is unsound.

The plan has failed to demonstrate any exceptional circumstances for the release of Greenbelt.

The plan's over reliance upon logistics and HGVs, failure to resolve the bottle necks of crossings over the Manchester Ship Canal and proposed construction of houses away from

the town centre that will continue to drive increased air pollution is unjustified.

For these reasons contained in this response I believe WBC should review and amend their plan.

Sally Chisholm