

Response 694

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: Alan Hilton

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

Contact details	
Organisation name (if applicable)	-
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

None of the above

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant	X	
Sound		X
Compliant with the Duty to Co-operate	X	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

I am responding to the invitation to consult on the proposed plan for Warrington in my capacity as a resident of [REDACTED] in the South of Warrington who would be affected by the proposed Garden Suburb centred around Stretton, Grappenhall Heys and Appleton Thorn, the adjoining Employment Area and the residential development at Walton (South West Extension).

In order for my observations on the plan to have context, I would first list some relevant opinions about the South of Warrington (by which I mean South of the Manchester ship canal) and it's relationship with the rest of the town which have been formed by living in [REDACTED] for the last c. [REDACTED] years (and previously living in the North of the town):

- Access to the North of the town is reliant on road travel and, due to the Manchester Ship Canal and the River Mersey, access is constrained by the bridge infrastructure.
- The Manchester Ship Canal is crossed by swing bridges on the A56 (Walton), A49 (Stockton Heath) and Latchford (A50) in addition to a high level fixed bridge known as the 'Cantilever Bridge'. At peak travel times, these routes become heavily congested with associated pollution issues. With ¾ of these crossings being swing bridges, the road capacity to the North of Warrington is materially impaired whenever a ship transits the Ship Canal.
- The above mentioned bridges are maintained by Peel Ports and most are in a poor state of repair and it is widely reported how the Council has been attempting to secure commitments from Peel to refurbish the bridges. Peel are on record as indicating that each bridge will need to be closed for up to 6 months to complete such refurbishment. Clearly, any such closure will exacerbate existing traffic issues.
- The River Mersey can be crossed at Bridgefoot Island in the town centre (an extremely busy junction), via Kingsway (A50) or via the M6 (Thelwall Viaduct). Again, these routes become heavily congested at peak travel times.
- The South of Warrington is home to many professionals and other workers who commute to Manchester or Liverpool.
- The South of Warrington has no immediate connectivity to the train network whereas the North of Warrington benefits from Warrington Bank Quay, Warrington Central, Padgate, Birchwood and Great Sankey train stations. People wishing to commute to Manchester or Liverpool by train need to travel by road, crossing both the Ship Canal and the Mersey, to get to a station.
- The South of Warrington has significantly less municipal facilities that across the North – there is one old leisure centre in the South (Broomfields which has not had any recent comprehensive refurbishment) whereas in the North there 3 (Woolston, Orford Jubilee – newly built in 2012, and Great Sankey – comprehensively redeveloped in 2018) and one waste recycling centre which is under threat of closure by the Council (2 facilities in the North). In addition to this under-investment in the South, the majority of the town's retail provision (the town centre and all out-of-town bulky goods retail parks) are located in the North. These facts add pressure to the need for regular travel across the Ship Canal and River Mersey.
- The area is bounded to the South by the M56 and to the East by the M6 motorways. At peak travel times, these motorways are operating at excess of design capacity as several miles of queuing traffic (stop / start movement) is typical on a daily basis inbound to Manchester on the M56 (approaching junction 7) and over the Thelwall viaduct (such heavy traffic not being dependent on accidents or broken down vehicles – it is pure weight of traffic). The nature of such heavy traffic leads to increased amounts of exhaust emissions / pollution compared to freely moving traffic.
- Given its position, when the M6 is heavily congested, motorway traffic has a habit of using Warrington as an alternative route (typically from the M56 to the M62 via the A49) which causes significant local congestion.
- I understand that plans are progressing to build a new by-pass from the Walton area to the A57 (known as the Western Link) although it is reported that, whilst funding has been agreed by the Government, construction will not begin until 2021 at the earliest.
- Overall, I would consider that existing infrastructure is already stretched beyond its original design capacities and adversely impacts on the quality of life of existing residents.
- The areas forming the South of Warrington are characterised by higher value housing stock than much of the North.
- The schools in the South of Warrington are usually fully subscribed and have limited capacity.

Noting the above, I would comment on the Council's proposals for the South of Warrington specifically as follows:

- The nature of the local housing market is such that, even at a discount to market value to provide 'affordable' housing, it is likely that the type of employees who will work in the new Employment Area will not be able to afford to live in close proximity to their new jobs and hence would need to commute across Warrington adding to existing traffic problems. I would consider this to be unsustainable and not sound.
- The alternative to ensure sufficiently affordable housing was provided would require a considerable change in the character of the area regarding the housing stock and nature of the local housing market. I understand this would be contrary to Council own policy objectives.
- The new Employment Area will add directly to traffic issues due to the increased volumes of HGVs etc. I would consider this to be unsustainable and not sound.
- I understand that commercial development will be based around the logistics industry – this is a sector which produces modest numbers of jobs relative to the floor area of development and these are usually relatively poorly paid providing limited economic benefit in the context of the loss of greenbelt land.

- The proposed new residential stock of c. 6,000 units + c.900 already consented in the South of Warrington (based on existing demographics characterising the area) will attract many family groups requiring access to school places, health facilities etc. Additionally, it will attract a significant number of commuters to the major cities (the PDO Consultation raising concerns about this issue) and, without any proposals to bring the rail network into the South of Warrington, this will add to existing local road and motorway congestion and increased pollution / air quality issues. I would consider this to be unsustainable and not sound.
- A materially increased population in the South of Warrington will add further pressure to the road network given the need to travel to the North to access municipal facilities and retail. The Council's proposals to promote walking and cycle use are naïve in the context of the relative location of the proposed development with town facilities and likely work destinations.
- The failure to make proposals to connect the South of Warrington to the rail network in the context of the proposed concentration of development in the South fails to address the Council's own stated priorities to reduce car travel and improve air quality (Policy INF1). I would consider this to be unsustainable and not sound.
- The Council's proposals on local infrastructure improvements and additional new facilities (e.g. health centres and schools) are vague and offer limited detail in respect of the source of funding. Whilst I appreciate s106 (and similar) contributions would be levied, it strikes me that the very material costs associated with the sort of investment required to support the scale of development in the South of Warrington would only be viable from a house builder's point of view after a significant amount of housing has already been delivered whereas existing infrastructure is already at capacity. I would consider this to be unsustainable UNLESS INFRASTRUCTURE AND FACILITY IMPROVEMENTS WERE DELIVERED FIRST (noting also that the Council have already consented c. 900 units in the South without any such improvements).
- Whilst work on the motorway junctions contemplated in the plan will improve the immediate ingress and egress to the motorway network, without expansion of capacity on the M56 and M6 themselves, existing congestion problems will be exacerbated (noting the likely growth in the commuter population) increasing environmental issues. I would consider this to be unsustainable and not sound.
- Whilst the Council refers to new roads to link the new Garden Suburb to existing main roads in the area, this will just route significant new traffic into existing neighbourhoods and put pressure on the Canal / River crossings which, as outlined earlier, suffer from significant existing congestion at peak times and will therefore add to pollution concerns. I would consider this to be unsustainable and not sound.
- Whilst the Western Link will help, there is no absolute certainty on the timing of its delivery and the relative positions of the Garden Suburb and the new road would require new traffic to travel across existing neighbourhoods. I would consider this to be unsustainable and not sound.
- The current greenbelt provides a buffer between the existing population and the pollution arising from the very busy motorway network (i.e. both space and physical vegetation which it is proven acts as a barrier to harmful particles). Development of the greenbelt in the manner proposed would lead to the loss of this barrier and risk a material deterioration to air quality (contrary to Policy INF1) and environmental damage across both new and existing neighbourhoods. I would consider this to be unsustainable and not sound.
- Clearly, the loss of greenbelt in itself is directly environmentally damaging and creates a loss of amenity.
- The latter points in conjunction with material increase in road traffic which I believe would be an undoubted product of the plan are completely at odds with the Council's objective W6 "minimum impact of development on the environment...ensure development... makes a positive contribution to improving Warrington's air quality" reinforced by the principles laid out in policy ENV8. The reality, rather than having a positive impact, will have a clear negative impact. I would consider this to be unsustainable and not sound.
- The South of Warrington is supporting a disproportionate degree of concentrated housing development in the town (the rest being scattered). Aside from this appearing an unfair burden on one section of the population as the impact is not spread across the town and its existing infrastructure, this flies in the fact of the North being arguably far more suited to material expansion due to the concentration of existing facilities (i.e. train stations, retail, municipal facilities, the Hospital etc) in the North which alleviates the challenges presented by congestion across the natural barriers presented by the Ship Canal and the Mersey.
- The loss of greenbelt proposed in the Plan across the town is biased towards the South of Warrington (c. 85% of all greenbelt loss proposed) focusing a significant loss of character in one part of the town rather than releasing smaller parts of greenbelt spread over a wider geographic area with reduced local impact. This is unfair to the existing residents of South Warrington.
- The Council has stated that alternatives were discounted due to impact on the character of existing settlements and increase in car trips – as expressed above, both are prevalent reasons to object to the subject proposals for the South of Warrington.
- The Council's numbers for housing need which underpin the justification it presents to release greenbelt for development are aggressive. They are predicated on 945 units p.a., which exceeds the Government's own figure of 909 and official population increase predictions of around 528. On top of this aggressive forecast, the council has also added a further 10% for 'flexibility'. The result is $945 \times 20 \text{ years} \times 110\% = 20,790$ less $13,726 \text{ urban capacity} = 7,064 \text{ greenbelt}$. Re-working using the Government's figures and excluding the 10% uplift (which seems very arbitrary and cannot possibly be a strong enough reason to meet the exceptional need test in order to justify the release of greenbelt for development) produces $909 \times 20 = 18,180$ less $13,726 = 4,454 \text{ greenbelt} (-2,620)$. At 528 units p.a. there would be no need for greenbelt development. These numbers illustrate how the amount of greenbelt development could be materially scaled back and still meet reasonable population growth forecasts. This in turn would allow far more of the greenbelt in the South of Warrington to be preserved with the associated environmental benefits.

Overall, I do not object as a point of principle to a necessary and appropriate degree of development in this part of Warrington, even on greenbelt land. However, I have outlined many reasons why the Council's proposed Plan should be deemed unsustainable and not sound. The current and proposed infrastructure just does not support the scale of commercial and residential development proposed in the South of Warrington without causing material additional congestion and deterioration in air quality and the Council has failed to demonstrate need taking account of the character of the area.

Most fundamentally of all, I cannot accept the idea that the exceptional need test for the loss of precious and irreplaceable greenbelt land can be justified based on forecasting (which over a period as long as 20 years has to be regarded as being little more than educated guesswork) which exceeds both historical and central Government growth figures and which also features an arbitrary 10% increase. It feels to me the Council is hoping that significant residential expansion in an affluent area will drive economic growth rather than housing provision being provided in reaction to demonstrated need (i.e. this is a supply rather than demand led argument).

I THEREFORE OBJECT STRONGLY TO THE PLAN IN ITS CURRENT FORM for reasons summarised below:

1. The requirement for the plan to be 'Positively Prepared' underpinned by objectively assessed needs is not met (noting the doubts I have expressed on the efficacy of the household growth forecasts and their somewhat arbitrary nature) and thus the plan is not sound.
2. The requirement for the plan to be 'Justified' is not met (again, noting the arbitrary nature of growth projections and alternatives being discounted for the exact same reasons the subject proposals in the South of Warrington should be discounted i.e. change of character

and increase in car use) and thus the plan is not sound.

3. The requirement for the plan to be 'Effective' is not met (again, due to the arbitrary forecasting, inadequate consideration to infrastructure issues and environmental impacts contrary to Council policy) and thus the plan is not sound.

4. The requirement for the plan to be 'Consistent with National Policy' is not met (noting the weak evidence provided to meet the exceptional circumstances test for the release of greenbelt land for development) and thus the plan is not sound.

I would welcome a revised plan with significantly reduced scale of development in the South of the town coupled with greater clarity, commitment and defined sources of funding in order to invest in infrastructure and facilities ahead of any material delivery of new housing units.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please previous comments

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)