

# Stockton Heath Parish Council

## response to the

### ‘Proposed Submission Version Local Plan’

### and the Local Transport Plan 4

#### **Introduction**

Stockton Heath is a village in south Warrington. The northern boundary of the village is the Manchester Ship Canal (MSC) and the southern boundary is the Bridgewater Canal. The A49 runs approximately north/south through the village and the A56 east west. They cross in the village centre. The A49 crosses the MSC via a swing bridge which was installed in the 19<sup>th</sup> century. Through traffic and swing bridge closures, frequently cause congestion and stationary vehicles.

SHPC responded to the regulation 18 consultation on the Preferred Development Option in September 2017. The PSV Local Plan has not effectively addressed many of the issues expressed in 2017 and the Parish Council does not consider that WBC has demonstrated that the PSVLP is sound and achievable.

#### **The Borough Council has not convincingly shown that:**

- **the already compromised quality of air in Stockton Heath Village will not deteriorate further as a result of the extra traffic the additional houses to the south will generate. This is of greatest concern to the Parish Council;**
- the number of houses the Plan is designed to accommodate is required;
- there are exceptional circumstances to justify the release of green belt land to the south of the village;
- there are sufficient safeguards to prevent released land from being developed before the supporting infrastructure has been secured;
- the supporting transport infrastructure proposals are adequate or can be funded;
- the already frequently congested A49 and A56 will be able to absorb the additional traffic, which over 7,100 additional houses (up to 2041) and planned employment areas in the south will generate, without causing further congestion and pollution.

#### **Air quality**

The World Health Organisation published, in May 2018, a report showing that Warrington had the highest levels of air borne particles, PM2.5, in any town or city in the UK. The level in Warrington was measured at 14micro grams per cubic meter which exceeds the WHO limit of 10. It is likely that, given its proximity to the A49, the district centre of Stockton Heath (classed as retail but with many residential homes located nearby) could also be above the WHO guidelines.

Although NO<sub>2</sub> is monitored, particulate pollution from vehicles is not currently measured by the Borough Council in Warrington (with the exception of the DEFRA background site in Great Sankey). Stockton Heath village sits on the boundary of an air quality management area (AQMA). NO<sub>2</sub> content in the village is, at times, above the maximum for residential areas. In addition, there are many cafes and drinking establishments where customers sitting outside will be directly exposed.

The Parish intends to acquire an air quality monitoring device, which will be sited on the A49 and this will continuously measure PM 2.5 and other air pollutants, allowing an air quality profile to be produced. The information will be available for presentation at the public enquiry stage of the PSV Local Plan approval process.

**The extra traffic, resulting from development proposed in the new Local Plan, is likely to further decrease air quality in Stockton Heath district centre.**

The Parish Council does not accept the premise, in the Local Transport Plan, that the move to electric powered vehicles will offset the polluting effect of increased traffic. A switch to all electric vehicles will not take place until well after the Plan period. Electric vehicles will produce particulate pollution from brakes, tyres and the road surface just as vehicles powered by the internal combustion engine do.

## **Housing Numbers**

The Borough's own 'Housing Strategy 2018-2028' document, which has informed the Plan, states, based on population forecasts, that Warrington requires 586 houses per year up to 2037. The PSV Local Plan, however, states that 945 new houses per year over the 20 year period are required. There is no convincing reason provided for this difference.

The Parish Council recognises that Central Government requires the Borough to expand the Town by at least 909 houses per year. Sufficient brownfield land has been identified in the Plan to accommodate 13,700 new homes. A plan covering 15 years instead of 20 would satisfy Central Government's requirements (15 times 909 = 13,635) without the need to release green belt land. Over a 15 year period further brown field sites may well become available: for example Fiddlers Ferry and the Warrington Hospital site.

There is a risk, with the Proposed Plan, that developers will build on the most profitable land (ie green belt) first. The green belt will then be lost forever and the real housing need in the Town will not have been resolved. Even with the requirement to build a proportion of 'affordable' houses (priced at 80% of the average unit price in the area), this will not produce the low cost housing, identified as needed in the Borough's housing strategy document.

**The Parish Council can find no evidence that the 2,283 social housing unit need, identified in Housing Strategy 2018-2028, can be delivered by the PSV Local Plan.**

**The timeframe of the Plan should be reduced from 20 years to 15 years with a commitment to build on brownfield sites only.**

## **Green belt release**

Central Government has stated that green belt land should only be released under exceptional circumstances. A 15 year Plan would not require the release of green belt land for the building of dwellings. The emergence of additional brown field sites during that plan period would mean that Warrington's green belt could be protected for longer.

**The Borough has not demonstrated exceptional circumstances for the release of Green Belt land.**

## **Transport Infrastructure**

The addition of 7,100 houses in the 'Garden Suburb' (5,100 during the proposed Plan period) will generate significant additional vehicular traffic onto the A49 through Stockton Heath village. The Transport Plan (which accompanies the PSVLP) suggests that residents will walk or cycle on segregated cycle ways to their place of work, but the occupants of homes situated to the south of Warrington are more likely to use cars to commute out of Warrington to their work place.

Paragraph 2.1.10 of the Plan, Evolution of Warrington, states that the Warrington New Town Outline Plan strategy of 1973 intended the expansion of the Town from a population of 120,000 to 200,000. The narrative neglected to mention that the New Town Development Corporation also planned major road infrastructure to provide an expressway from Stretton (M56) in the south of the Town, crossing the Bridgewater and Manchester Ship Canals via a new high level bridge (including rail) to link to the M62 and M6 to the north of the Town. This was planned for completion before large scale building projects would begin and was regarded as necessary to cope with the additional traffic that the population growth would generate.

**The transport infrastructure projects in the Plan, including the Western Link, many of which are not funded or guaranteed, are inadequate and will not alleviate the traffic congestion and gridlock which the proposals in the Plan will generate.**

## **Employment Areas**

The new employment areas, proposed for green belt land in the south, will be predominately warehousing and distribution, which will benefit from the proximity of the motorways. Warehousing and distribution has a comparatively low employee to area occupied ratio. The employment opportunities generated will not be sufficient to justify the harm that loss of green belt will bring. Additionally, many employees are unlikely to reside in the nearby garden suburb and will, therefore, be unable to use sustainable transport choices, such as walking or cycling. There will, however, be a significant increase in the number of HGV movements.

**Use of green belt for employment opportunities will cause more harm than benefit.**

## **Other supporting infrastructure**

Although the Plan will identify land allocated for schools, medical centres, retail outlets etc., the Plan can have no influence in determining when these facilities will be completed. With the exception of the possible building of a leisure centre and limited social housing, the Borough Council has little power to build anything. These facilities will only be provided when sufficient demand has been generated through house building.

**Supporting infrastructure should be provided within the build period and not on completion.**

## **Summary**

The extra traffic resulting from development proposed in the new Local Plan is likely to contribute to a decrease in air quality in Stockton Heath district centre.

The Parish Council is not satisfied that there is a demonstrable need for 945 homes per year to be built during the 20 year period of the Plan.

The Parish Council can find no evidence that the 2,283 social housing units needed, identified in Housing Strategy 2018-2028, can be delivered by the PSV Local Plan.

The timeframe of the Plan should be reduced from 20 years to 15 years with a commitment to build on brownfield sites only. The 909 houses per year, that Central Government says are required, could all be built on brown field sites with a 15 year plan.

The Parish Council holds that the Borough has not demonstrated the exceptional circumstances for the release of Green Belt land.

Many of the transport infrastructure projects, identified in the Plan as being necessary, have no funding or guarantee of being provided. The Plan should have a policy which requires infrastructure to be in place before building is permitted.

Use of green belt for employment opportunities will cause more harm than benefit.

**The Parish Council request to speak to its concerns at the enquiry in public.**

