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## **Updated Proposed Submission Version Local Plan 2021 Consultation**

I want to make the observations below.

### **Housing numbers**

The new Plan requires 816 new houses per year to be built in Warrington. On average, over the last 10 years, 567 (net figure) new houses per year have been built. The Borough's own Housing Strategy '2018-2028' document, written in 2018, called for 586 per year. The latest population growth forecast from the ONS also suggests that between 550 and 600 per year will be needed.

The 816 number has been imposed on the Borough Council by central government, which insists its standard method for determining house build numbers be used. This has to be challenged.

### **Green Belt**

The proposal to create the 'South East Urban Extension' (SEUE) to the south east of Stockton Heath village on Green Belt land, which will comprise 4,200 new houses (at least 2,400 within the Plan period), is strongly objected to, as is the creation of a logistics site on 137 hectares of Green Belt close to junction 20 of the M6/56.

If more realistic house build numbers are used, the Green Belt release for the 'Urban Extension' will not be required. The Six/56 proposal uses a large area of Green Belt land for comparatively few jobs. Logistics operations should be close to railway sidings to reduce HGV movements and not near an already very busy motorway junction.

Brown land must be used before Green Belt is considered. Borough documents indicate that 11,800 houses could be built on brown land already identified. If housing numbers are reduced to more realistic levels, Green Belt will not need to be considered.

## **Infrastructure and traffic**

Should the Plan not be modified, proposed developments to the south east of Stockton Heath will result in a significant increase in vehicle traffic both into and through the village. Most of the facilities in Warrington that residents will want to access – two railway stations, the general hospital, town centre shops, large supermarkets, retail parks, employment areas and the science employment park, etc. - are in the north across two canals and the river Mersey.

The swing bridges across the Manchester Ship Canal are a permanent bottleneck which slows and stops traffic continuously. They are 19<sup>th</sup> century canal crossing solutions for 21<sup>st</sup> century traffic. It is not sustainable.

The current road system is already at capacity. The Plan proposes to direct traffic from the Urban Extension onto the A49, most of which will go through the village. The 4,200 additional houses could introduce an extra 8,000 more vehicles into the system. This is not sensible.

## **Air quality**

There is an air quality monitor on the A49, London Road in a residential part of Stockton Heath. This has been in place now for almost two years. It measures the contamination in the air where vehicles enter the village. Two contaminants are of concern; nitrogen dioxide (NO<sub>2</sub>) and very small particulates known as PM<sub>2.5</sub>.

The latest World Health Organisation (WHO) guidance for the yearly average of NO<sub>2</sub> contamination is no more than 10 micro grams per cubic metre and for PM<sub>2.5</sub> it is no more than 5. The monitor has recorded an average between September 2020 and September 2021 of 19.97 for NO<sub>2</sub> and 8.47 for PM<sub>2.5</sub>. This is already above WHO air quality guideline aspirations. The 24 hour averages were, at times, also above the guidelines.

This information is taken from the Stockton Heath PC web site.

NO<sub>2</sub> comes primarily from vehicle internal combustion engines.

PM2.5 emissions come from several sources. Windblown dust and smoke from wood burning stoves will contribute. Vehicles produce them from exhaust pipes, and also from brake, tyre and road wear. The growth in electric vehicles is not the solution as they will also generate PM2.5 from their brakes, tyres and road wear.

Much of the additional traffic from the developments already underway will access the Town's facilities using the existing A49 London Road. It will be funnelled into Stockton Heath to cross the canals and river. This means air quality will deteriorate further. Warrington Borough has already declared the A49 immediately to the north of the village an Air Quality Management Area (AQMA) based on the levels of NO2.

The additional vehicles from the 4,200 new houses proposed in the Plan will further increase air contamination. That is not acceptable.

### **To summarise.**

The loss of Green Belt is not acceptable. Please remember that Central Government guidance says 'Green Belt land should only be release in exceptional circumstances supported by evidence and justification'. The Plan has not done this. The housing numbers proposed have to be challenged. Brown field land must be developed before Green Belt is considered.

The A49 to the south of Stockton Heath is already at capacity. The Plan proposals resulting in potentially 8,000 more vehicles onto the A49 are not sensible or sustainable.

Air quality will deteriorate further.

**Please take my comments into account when revising the Plan.**

**Yours faithfully,**

**Peter Walker** 