



Monday 15th November 2021

To whom it may concern,

Submission to the Warrington Local Plan Consultation

Dear Sir/Madam,

Rethinking South Warrington's Future – RSWF – is a group of community organisations, residents associations, NDP committees and interested persons covering much of South Warrington. You will find attached five documents which form our response to the Local Plan consultation:

- Report 1 – Transport Concerns and Potential Impact on South Warrington
- Appendix to Report 1 – 13 Key Questions & Observations on the Local Plan
- Report 2 – Green Belt
- Report 3 – Agricultural Land
- Report 4 - NPPF

RWSF do not believe that the draft Local Plan is sound. The housing numbers and employment land included in the plan are not justified. While some responsibility for the housing numbers lies with the government's NPPF and housing need methodology, we feel that the Council could do more to protect Green Belt sites by preventing their release. Although the Council has tried to improve the use of brownfield land, we feel that more imagination could be used to repurpose land in the town centre which the changing nature of the High Street suggests could be better utilised at housing.

Accepting that the government's methodology generates a housing figure, we feel that the proposed spatial options will not just lead to Green Belt loss, but we will actually create infrastructure chaos as there are serious questions about how the existing highways network will cope with additional housing when it is already under great strain. Our first report and its appendix focus on these transport infrastructure issues, as we feel these issues show the plan to be unsound. As a group we also welcome the work of transport planner David Thrower, who has responded to the consultation in his own name, with a detailed alternative proposal which demonstrates how Warrington could deliver the housing number without causing such significant infrastructure challenges. While we don't subscribe to the exact

spatial options suggested by Mr Thrower, we recognise the proof that an alternative approach is available and the Council's current proposals are not the only way to deliver the Local Plan.

Transport infrastructure has been a challenging constraint for Warrington's development since the New Town designation in 1968. At the 1972 inquiry into the New Town, the highway authority of the time, Cheshire County Council, stated that no more than 1,000 houses should be permitted south of the Manchester Ship Canal without the proposed North-South Expressway which would incorporate a replacement of the Cantilever high-level bridge. More than 2,500 houses have been built since than inquiry. How are planning policy officers proposing that the findings of the 1972 inquiry and subsequent commitments by the authority are no longer valid?

Furthermore, the constraints on south Warrington's transport infrastructure have already led to air quality problems in a number of locations across the borough. Data shows that air quality in Stockton Heath already exceeds WHO limits at peak times. Given the lack of new transport infrastructure proposed, how can Warrington Borough Council make proposals which will run contrary to the government's Clean Air Strategy (2019). Recent coroner's judgements have attributed air quality as a cause of death. Surely Warrington Borough Council would be abdicating their legal and moral responsibility for the health of Warrington's people if they commit to development which worsens air quality.

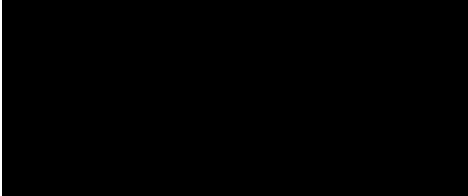
We also feel that the economic growth aspirations do not justify the loss of Green Belt for employment land. The choice to use this employment land for logistics, at a site which is not multi-modal, is unsound for environmental and highways reasons.

In summary, we do not believe the draft Local Plan is sound for the following reasons:

- There is no justification for the scale of Green Belt release, nor are there any mechanisms to protect the released land as the plan period progresses (as detailed in Report 2).
- There is too little emphasis on Town Centre regeneration and maximising the use of brownfield sites, including the repurposing of other land uses in the Town Centre which could be better utilised as housing. The plan should do more to stress brownfield development before Green Belt.
- There is no justification for the economic growth and therefore for the volume of employment land.
- Although the government housing methodology has been followed, past rates of housebuilding suggest the targets set for Warrington are undeliverable.
- There is a complete lack of transport infrastructure provision, with little to no indication of how the existing road infrastructure, which is constrained by limited crossings of the Manchester Ship Canal and Bridgewater Canal, will be improved to cope with the additional housing and employment land (as detailed in Report 1).
- There are several instances where the PSV appears to diverge from the NPPF, especially around sustainable development (as detailed in Report 4).
- At present, with climate change issues and food security challenges following Brexit, it seems inappropriate to develop greenfield land from the Green Belt, much of which is currently agricultural land (as detailed in Report 3).

Together with our enclosed reports, RSWF would like to fully endorse the consultation response submitted by the South Warrington Parishes Group. Like them, we consider the draft Local Plan to be unjustified and unsound.

Kind regards,



Councillor Ryan Bate
Chair
Rethinking South Warrington's Future