
Robert Mulvee

[REDACTED]

10th November 2021

Local Plan
Planning Policy & Programmes
Growth Directorate
Warrington Borough Council
East Annex
Town Hall
Sankey Street
Warrington
WA1 1HU

By Post & Email

Dear Sirs

Warrington Proposed Submission Version Local Plan 2021

I do *not* believe that the proposals contained in the above document are sound. Whilst accepting that Warrington has to grow and some development is needed, I do *not* accept the scale and nature of what is being proposed by WBC due to the profound negative impact it will have, in particular, on the residents of South Warrington in the future. Instead of improving the quality of our lives, the proposals will cause serious deterioration.

The plan is unsound for the following reasons:-

PLAN ASSUMPTIONS

- There is *no* justification for the predicted **growth levels**. Growth predictions are *unrealistic* and based on levels of activity and development at rates which have never been achieved before.
- Growth is predicated on new housing development creating economic benefit, instead of the other way round.
- Housing numbers are not based on current government criteria and are thus overstated. The Housing and Communities minister has further stated (8th November 2021) that the way housing need is calculated is "probably out of date" and intends to review the methodology to be applied. WBC need to take heed of these comments and revisit these proposals as soon as possible.

GREEN BELT

The National Planning Policy Framework states that Green Belt boundaries should only be amended in exceptional circumstances and this has not been demonstrated.

- The Green belt boundaries were only set 7 years ago in a plan that was supposed to last 20 years.
- Why should green belt land be used for construction of Warehousing and other low employment generating uses - how can this be regarded as exceptional?
- The LP seeks to create urban sprawl (the clue is in the name “ South East Urban Extension”)
- Warrington will lose 5% of its Green Belt, virtually all of it in South Warrington.
- The Government (Secretary of State for Housing & Communities 8th November 2021) has reiterated its objection to building on the Greenbelt, shouldn't the plan recognise this and future proof its proposals?
- How does building on agricultural land fit with a green economy and national objectives?
- The Local plan states that the Green Belt needs to be built on to satisfy Government targets. The plan does not show convincingly what the exceptional circumstances are for development in the green belt.
- The council are desperate to build in such high numbers in south east Warrington since building in high numbers in an area attractive to developers is the only way they will be able to cross subsidise town centre development (the Cushman & Wakefield viability report describes this).

DEVELOPMENT LOCATION

- The **location** of new homes should be where the new jobs are being created to minimise commuting, and also be **affordable** in relation to the types of jobs created. This is *not* the case in relation to South Warrington.
- The new jobs created near the 'South East Urban Extension' will be mainly distribution and logistics related and their number will be low. Where are the thousands of jobs coming from that create this housing need. The large numbers of predominately higher value homes will become a commuter area with the new residents working outside the area.
- The villages of Walton, Grappenhall, Appleton Thorn and Stretton will be completely changed in relation to their **character and distinctiveness** which is contrary to the 'Vision for Warrington's future' outlined in the Local Plan.
- The proposed scale of development will have a devastating impact particularly on Stockton Heath which is the prime destination for residents in south Warrington for shopping and socialising; there is inadequate car parking now with parking over spilling into residential areas; even with alternative modes of transport cars diverting to reach the Western link and centre park bridges will create unbearable levels of congestion and worse air quality.

INFRASTRUCTURE

LTP4 which should offer identified solutions to support the LP is not a transport plan but simply a menu of options which are uncostered without timescales and as a result funding sources cannot be identified with the necessary certainty and is not a suitable transport strategy to support the LP in a meaningful way. The numbers of planned dwellings is known now so the infrastructure should be capable of being determined now rather than being kicked into the long grass and subject to further studies at some indeterminate point in the future.

The document titled “ Transport Frequently Asked Questions (October 2021)” in respect of LTP4 exemplify the uncertainty:

- What transport infrastructure is planned for the South East Urban extension ?“- (at Page 3)..... “indicative highway improvements and supporting transport measures have been identified i.e. to be determined later. So a multi-million piece of essential highway infrastructure has no identified funding source. Measures to restrict HGV’s on sensitive residential roads will be “investigated”(page 4).
- Funding to support bus services from the SEUE is noted but this is only a start up fund. WBC have previously sought to cut bus services in the area. How will they maintain this funding?
- High level Cantilever bridge - (at Page 5)..... “the type of improvement is not known, funding is not in place and a start date is not known”. This scheme has been in the planning stage for 30+ years already with consequent blight.
- New crossing of the Manchester Ship Canal - (at Page 5) - accepts that physical improvements including a new crossing required but only commits to”Within the first five years of the LTP4 to undertake further study work into what form of crossing is required, what it’s location should be and it’s deliverability”. This is a key piece of infrastructure yet so little thought has been given to what will be an extremely challenging task given the geographical constraints, engineering requirements and public opposition.
- Reference is made to a Mass transit system which is no more than a distraction from the increased congestion facing south Warrington due to these proposals. “ this is subject to further work in the first five years of the plan” (page 5).
- Even the Western Link has only passed into programme status so funding is by no means certain. The removal of Port Warrington from the Local Plan and housing at Walton makes the business case for the link questionable.

The LP fundamentally relies on an existing road network which is currently massively over capacity. Whilst the western link and Centre Park Link bridges will help to alleviate some traffic issues the scale of the associated development will significantly degrade their effectiveness.

The traffic infrastructure proposals to alleviate the current problems in South Warrington **and** also support the new housing and commercial developments are totally inadequate for the following reasons:

- The ‘South East Urban Extension’ will have 4,500 new houses with consequent daily car journeys of around 10,000:-
 - It is noted that road improvements at the Cat and Lyon and Longwood road junctions on the A49 as it goes north from the M56 towards Stockton Heath are proposed- by the very nature of their geography these can only be very limited and would not be effective on a route that is already extremely congested and polluted. There are no defined proposals. There is no defined route/ proposals for the new link between the A49 and Stretton Road - surely this should be known at this stage? (Page 4).
 - The statement is made (page 4) that traffic modelling shows that the impact of new development traffic is zero since it will use the new infrastructure. This is palpably impossible and completely ignores the inadequate nature and interaction of the existing highway infrastructure outside the new development area.
 - There is no new route into town from the south east of the town. There is *no new crossing* of the Manchester Ship Canal to serve South East Warrington.WBC are relying on *the existing*

Victorian swing bridges (over which they have no control) and single track crossings of the Bridgewater canal without any demonstration how such obsolete infrastructure can cope with the increased traffic numbers.

- Even if the Western link bridge were to be implemented access to this from south east Warrington would be via already congested roads with a tendency to use “rat runs” to access.

- The Transport Plan does *not* provide any realistic details of how the new public transport systems would cross the Manchester Ship Canal or the Bridgewater Canal.

DELIVERABILITY

- The National Planning Policy Framework requires the Plan to be aspirational but **deliverable**. I do *not* believe this Plan is deliverable and is therefore *unsound*:
 - The annual average delivery of 816 (objective W1) new houses is more than double the current build rates (359 in 2018/19) and furthermore rises to around 1300 in years 6 - 10. Developers will only build houses if they believe they can be sold, so the control on the rate of building does not lie with WBC but with the developers.
 - The Infrastructure Delivery Plan (2021) noted that for the SEUE alone the developer will need to fund £127m of infrastructure directly and a further £64m through S106 agreements. This equates to £45k per dwelling which does not seem realistic.
 - Timescales for community infrastructure (schools, sports facilities, health centre etc.) are “to be confirmed”. Funding is reliant on S106 agreements. What is the fall back position if these are not forthcoming at the required levels.
 - If the Inspector sees fit to approve the Local Plan it should be conditional on firm infrastructure proposals and their funding being in place before any further housing is constructed.

SUMMARY

In summary the proposals are unrealistic, not objective, fail to recognise the geography of particularly south Warrington and the inherent limitations on improving links across the Ship/ Bridgewater canals and hence the LP and LPT4 has postponed any consideration of what is feasible until after the LP is approved.

The attitude of Warrington Borough Council is let's build now (its already happening), worry about the infrastructure later and if it's not feasible or affordable so be it.

Yours Sincerely,

.....

Robert Mulvee

10th November 2021