

Sharon Harris


14th November 2021

Dear Sir

RESPONSE TO THE
WARRINGTON UPDATED PROPOSED SUBMISSION VERSION
(PSV) LOCAL PLAN (SEPTEMBER 2021)

Firstly, I welcome the Borough Council's decision to remove the South West Urban Extension in Walton from this version of the Local Plan. Had it remained, it would have removed a valued area of green along the A56 corridor and would have completely changed the character of Higher Walton.

Housing Numbers/Green Belt

Whilst I recognise that people need houses and those houses have to go somewhere, I feel that this plan is unsound and not deliverable in terms of Warrington's own history in the build out rate.

In this context, I challenge the requirement in PSV2 that 816 houses are built every year. Over the past ten years the average build rate in Warrington has been 567 and the Borough Council's own Housing Strategy '2018-2028' (written in 2018) called for 586 per year. The government's target of 816 houses per year is not deliverable or realistic. A more achievable target would be more in the region of 600 per year ; I suggest that a more realistic and deliverable target is set at a lower build rate of 600 per year. By following this requirement, whole swathes of Green Belt are likely to disappear forever.

I ask that Warrington Borough Council challenges the government on these high numbers before they become part of the Local Plan.

I believe that if more realistic numbers were used in PSV2 the need to use such large areas of Green Belt would be removed ; building on Green Belt should only happen when all available brown field sites have been exhausted.

I firmly believe that PSV2 continues to perpetuate the rationale of past New Town planning and, therefore, does not align with NPPF policies stating that plans should 'be prepared positively, in a way that is aspirational but deliverable " .

I welcome PSV2's development of brown field sites such as Fiddlers Ferry and town centre development as a means of reducing the pressure on Green Belt, but I do not believe it goes far enough. The proposed PSV2 will condemn Warrington to a future of continued car dependency as the focus continues to be on building large numbers of houses in places where the current infrastructure, both transport and social, is completely over-stretched

I welcome the inclusion of Fiddlers Ferry, a brown field site which already has two rail links. There is a huge potential here to include it in a more cohesive rail strategy, linking Liverpool, Manchester, Warrington and further afield via HS2. It is capable of providing housing and employment which will be sustainable with good transport links and offers the possibility of new rail stations opening up.

Fiddlers Ferry could open up an area for development which would enable a greater concentration of housing to the west and northwest, between Fiddlers Ferry and the Liverpool-Warrington-Manchester railway where it intersects with Farnworth Road. A new station would give easy access to Warrington, Liverpool and Manchester. This would be a driver for economic growth and is a great opportunity for Warrington.

I am concerned about the multiple proposals for the local road network in Stretton ; it has yet to be proved that the upgrade of the A49 roundabout at Longwood Road would bring any significant improvement, nor would the upgrade of the traffic lights at Lyons Lane. The Cat and Lion relief strategic road link connecting near the Spire Hospital on the A49 would increase congestion and backing up to the slip roads on M56 J10.. Instead, I would suggest that any distributor road should connect directly to M56, at J10 , thus reducing any impact on the local network. The 'stopping up' of the B5356 at the Cat and Lion junction with Stretton Road will severely impact on local residents and will increase local journey times, distances and air pollution. This would appear to be in contravention to NPPF guidelines.

Most of the proposed new housing developments in South Warrington are not sustainable as the focus is still on building satellite housing developments (Garden Suburbs). Realistic opportunities to improve the transport infrastructure are extremely limited and this does not comply with NPPF para 105:

' The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'

An example of this is the South East Warrington Urban Extension (SEWUE) which follows the old model of putting housing in areas where the transport infrastructure is already inadequate, at capacity and will not be able to absorb increased numbers of cars and HGVs. Public transport is almost non-existent and services are being cut. Warrington's Own Buses are investing in a new electric fleet but there is little confidence that bus services will increase significantly and be cheap enough to enable a high take up by the public in this area thereby making it sustainable.

The Western Link

I am extremely concerned that the Western Link is still in PSV2 . The South Western Urban Extension was said to be the ' trigger' for the Western Link and the road would not be built until building of the 1,600 houses in Walton had been substantially progressed. Now that these houses have been removed from PSV2 and will not be in Walton, the business case is severely compromised despite partial government funding .

This road has issues in respect of the high level bridge crossing of the Manchester Ship Canal (potential gradient issues). It will also cross under the Network Rail London to Glasgow line (Victorian Walled viaduct) and it will cross under the Network Rail West Coast mainline viaduct. I wish to express my major concerns that such a highly complex and technical scheme for a single carriageway road, at a budget of £212m is unrealistic . I believe that the Outline Business Case is such that the scheme is undeliverable. It is an extremely complex and high risk civil engineering project which has already been subject to delay. Such delays and the fact that the revised commencement date is now 2023 with completion in 2026 can only mean that costs (especially in a post-covid world) are likely to escalate even more.

The South Western Terminal shown on page 3 of the Build Out Scenario, connecting the Western Link with the Chester Road - is essentially a huge roundabout (referred to as a controlled junction). It will severely impact the character of Lower Walton which is a semi-rural area.

A slip-road into Walton Lea has been included in the design. Has any consultation taken place with either residents or the Walton Lea Partnership?

The Centre Park Link from Gainsborough Road through to the town centre has generally had a positive impact on both local and town centre traffic. In addition, I do not believe that the Western Link, a single carriageway road connecting two existing dual carriageways, would have the capacity to cope with a potential influx of cars and HGVs rat running from J11 on the M56 to Sankey Way A57 and inevitably on to the M62 as well as traffic avoiding the Mersey Gateway tolls. The Western Link is nearly irrelevant to local travel needs in Stockton Heath, Grappenhall and Latchford ; the potential for HGVs and private car rat-running through the villages of Stretton, Hatton and Daresbury is a real threat and cause for concern.

Air Quality

A report by academics at Manchester University (Setting Climate Commitments for Warrington) indicated that Warrington Borough Council's previous Local Plan and LTP4 were in breach of the commitments enshrined in the Paris Agreement 2015. Warrington declared a 'Climate Emergency in June 2019 and 'Green Energy Strategy in September 2019 and does not yet appear to have moved forward in its stated aims. It continues to pursue outdated policies which do not reflect the huge changes there have been over the past couple of years.

I am astounded that Warrington Borough Council has not taken issues regarding air quality seriously enough to ensure that all areas in the town have air quality monitors. It has even relied on Stockton Heath Parish Council to take a lead . Warrington has historically

underspent on air quality monitoring - there is only one air quality monitor (Selby Street) in town. The air quality monitor is only in one location in Stockton Heath and it does not measure PM10. PM2.5 and PM10 (Non Exhaust Emissions) are the most dangerous particulates for human health. it should be incumbent upon any local authority to protect the health of its residents and Warrington Borough Council is failing to do so.

The quality of the air we breathe has a direct effect on the health of the population, particularly the most vulnerable. This has been sadly demonstrated by the death of Ella Kissi-Debra in London where the coroner confirmed in 2020 that air pollution was clearly the cause of her death . In Britain, it is estimated that every year 40,000 people die prematurely due to poor air quality . Warrington has sadly contributed to this figure as in 2018 it was estimated that 145 people died prematurely every year due to poor air quality. How can Warrington Borough Council allow this to continue by planning a town that will continue to be car dependent. Local Transport Plan 4 is vague and does not adequately address this issue . In fact I would contend that LTP4 should be detailed, strategic master plan upon which the Local Plan is framed.

In March 2021, Client Earth published the following:

'After years of warnings from the European Commission, the Court of Justice of the European Union (CJEU) [ruled today](#) that the UK has “systematically and persistently” exceeded legal limits for dangerous nitrogen dioxide (NO₂) since 2010, and has failed against its legal duties to put plans in place to tackle the problem in the shortest possible time. This could see the UK facing fines if it still fails to take action to comply ... “The government has been dragging its feet for too long on the air pollution crisis, downplaying the problem and passing the buck to local authorities.'

Source:

<https://www.clientearth.org/latest/press-office/press/top-court-confirms-uk-has-broken-air-pollution-law/>

There are 9 measures in the Air Quality Action Plan (AQAP) still to be completed. The first is the Local Plan and the lack of significant change in respect of housing numbers and transport infrastructure means that it is likely that the mistakes of the past will continue to encourage a car based economy, thus impacting on future air quality

Main Areas of Objection

- The projected housing numbers are not deliverable - I request that Warrington Borough Council challenges these numbers;
- The transport infrastructure requires a complete strategic review which will enable housing development on brown field sites first before green belt land is considered;
- There must be a complete transport infrastructure and LTP4 should be the master plan upon which the Local Plan is based.
- The Outline Business Case for the Western Link MUST be urgently reviewed before proceeding further.
- A lack of reliable air quality data makes the Local Plan unsafe for current residents, their children and grandchildren. A robust and reliable network of air quality monitors

MUST be in place to provide accurate air quality data before proceeding with a Local Plan that will be 'silently' killing Warrington residents.

Finally, my representation is seeking a change to the Plan and, therefore, I formally request the opportunity to be invited to be heard at the hearing sessions of the Examination in Public.

Yours faithfully

Sharon Harris