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From: Natasha Holdsworth [Redacted]
Sent: 15 November 2021 12:39
To: Local Plan
Subject: Local Plan Objection

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14th June 2019

Local Plan
Warrington Borough Council
New town House
WA1 2NH

Dear Sir or Madam,

I am writing to object to Warrington Borough Council’s proposed local plan in Warrington, as I believe the proposals are unsound and undeliverable.

Here are my main objectives, which are fully substantiated and need consideration by the council.

1) All ideas are conceptual

While the local authority has come up with some ideas on how to relieve the severe traffic problems Warrington will face with thousands of more commuters, workers and HGVs on the road, these are all conceptual. The Draft Transport Plan has no substance, and there is a lack of clarity about how the work will be carried out, what the changes will be, and most significantly, who will fund it.

The Warrington Western Link is not likely to help, as it will bring traffic to existing bottlenecks, as well as adding more congestion to people avoiding the toll roads on the Mersey Gate crossings. There is also no clear analysis about how this route will impact Walton / Chester Roads.

2) Consultation inadequate

The consultation process itself was not sound, as all council-run sessions took place at the Halliwell Jones stadium north of the Bridgewater Canal, the Manchester ship Canal, the Mersey and the town centre, despite the vast majority of the greenbelt development being proposed for south of these water barriers. Consultation events run by the council with council officers present should have taken place in the south of the Borough. The area most directly affected the South East Urban Extension could have had council run consultation events as last time in venues such as the park Royal Hotel. The failure to do this renders the consultation process unsound.

3) Lower growth rate for Warrington

The case has not been made for the growth that is driving the increased housing numbers in the Plan, as projected growth seems to far exceed current rate of population increase.

The 2018 ONS data predicts significantly lower growth for the town. In fact, it estimates a projected housing requirement of 458 homes per annum versus the plan's 816 homes per annum.

The Plan has not been adapted to take into account the latest data. Importantly, the growth in housing numbers generated by the standard model is "not a target" but a starting point. This starting point should be amended to reflect the 2018 ONS data. As a result of this failure to adapt the growth numbers driving the plans, it is not sound.

4) Unjustified release of green belt land

The case that is made for the green belt release is not sound. The Plan refers to an annual "target", but Christopher Pincher MP (Housing Minister) spoke in parliament on the 2nd of March 2021, saying: "The standard method for assessing local housing need is only the starting point in the process of planning for new homes; it is not a housing target."

The Council appears to have used this as a target and then increased the numbers via further uplift of 10%, generating a total requirement of 16,157 homes over an 18 year period. See also point (i) above.

The Plan, at point 4.1.10 of the document, confirms that Warrington has an urban capacity of approximately 11,800 homes that could be built on brownfield sites, the annual "target" pre the 10% uplift of 816 homes (which I consider to be un-sound and excessive). This implies that there is sufficient brownfield land to support a 14 1/2 year building program. On this basis, there is no need to release any greenbelt until sometime well beyond the first decade of this plan.

The priority of the Council should be renewal of the town centre and the development of brownfield sites, not to release the greenbelt.

There is no need for greenbelt release for well over 10 years using the council's own numbers if the brownfield land available is remediated. The council have some £1.7bn billion of borrowings, much of which relates to investments. If some of these investments were realised, the capital recovered could be put to local use in remediation of the brownfield sites. The council's priority should be that of regeneration of the town centre and the brownfield sites around Warrington.

In the early years of the plan, an enhanced stepped approach to the building figures could be taken which would allow for only the available brownfield sites to be developed.

Greenbelt release as an immediate consequence of this plan will have the effect of drawing development and developers to the released greenbelt rather than focusing attention and effort on the town centre and brownfield developments and work contrary to plans to regenerate the town centre.

It sacrifices the pleasant green spaces of South Warrington for no valid reasons; it is harmful to the environment; unsustainable in the context of the climate emergency; unjustified when looking at the 2018 ONS data; detrimental to the plans of developing the town centre; detrimental to the remediation and improvement of brown field land; contrary to the maintenance of distinctive and separate villages; woefully inadequate in terms of infrastructure to support in particular the greenbelt development; and woefully inadequate in terms of concrete proposals for the funding of infrastructure and services. The plan appears to have one purpose which is the unjustified and premature release of greenbelt. A greenbelt that should be protected for the future generations of people living in Warrington able to enjoy the green spaces the people of Warrington enjoyed today.

The opportunity to develop Fiddlers Ferry which has rail transport links to the town centre has been sadly missed. This location should not become an employment location but rather a new village built on brownfield land with

sustainable links to the town centre and beyond. The plan fails to capitalise on the opportunities that present themselves to the council for Brownfield land residential use at Fiddlers Ferry.

5) Climate emergency

The Council has declared a climate emergency. Therefore, the release of greenbelt is not sound in the face of the Council's own climate concerns, the government's own declaration of a climate emergency, and the global desire to reduce greenhouse gas emissions, as witnessed at COP26.

When brownfield land is available for use, there is no sustainable justification for the release of greenbelt land on the outskirts of the town. The release of greenbelt in the countryside surrounding the town and in particular the South East Urban Extension will create further car-dependent suburbs, leading to further congestion, pollution and negatively impacting the climate change agenda of the town and the country.

The South East Urban Extension, for example, has no provision for any form of mass transport other than the motor-vehicle and vague promises of public transport systems. The topography of the area that is ear marked for the South East Urban Extension makes a realistic alternative to the car almost impossible for journeys to and from the town or journeys to work.

The release of greenbelt for the building of the South East Urban extension is not sound and unsustainable given the context of a climate emergency.

Due to the increase in resident numbers, thousands more commuters will need to use motorway routes around Warrington. Therefore, not only will motorways block up much more quickly, but there will be severe bottlenecks at junctions to get on them.

Even those who want to commute to the nearby cities by train will cause major traffic problems getting into the town centre. Indeed, as the new homes are far from both Warrington's railway stations, this will result in cars having to drive through the town and over the waterway, causing more traffic in these areas.

6) Existing traffic problems

The plan is not sound in that it fails to address the already chronically overloaded road system in South Warrington, including the bottlenecks of Stockton Heath, Latchford, junction 10 of the M56, Junction 20 of the M6, and London Road between Stockton Heath and junction 10 of the M56.

The limited contribution to the road network contained within the plan for the South East Urban Extension is a link road from Grappenhall Hayes to Dipping Brook Avenue with a connection to the existing road network near Grappenhall Lane and a connection of a link road from Stretton Road to the A49 somewhere opposite the Spire Hospital. These do not address any of the current issues of congestion, rather it simply links areas within the already congested hinterland bounded by The Bridgewater Canal, the M6, the M56 and London Road.

Specifically, there are no concrete plans to address the junction at Lyons Lane and the A49, or the Owens corner roundabout on to the A49, both of which, if these plans were to go ahead, would see significant additional traffic flows and further congestion.

The proposed new junction opposite the Spire Hospital has enormous potential drawbacks. If this is to be operated by traffic lights, it would create a further worsening of the congestion that already sees vehicles backing up to the junction 10 of the M56. The implications of having traffic lights opposite the Spire and at the Cat and Lion will only increase the congestion on the A49 both northbound and southbound.

The proposal that in the short term there is a potential to link the A49 opposite the Spire to Spark Hall close is practically unworkable and creates significant congestion at the junction of Stretton Road and Spark Hall close opposite Saint Matthews Church and Saint Matthews school.

I can only conclude that those proposing the plan have not understood of the current issues facing the road network around the Cat and Lion junction and junction 10 of the M56.

The separation of the South East Urban Extension from the town of Warrington is exacerbated by the lack of the creation of any new crossings over the Bridgewater Canal, The Manchester ship Canal and the Mersey in this area of Warrington.

The possible addition of the Western Link will do nothing for the congestion in South East Warrington. In any event It is questionable whether the business case for the Western Link is now sound.

The lack of appreciation for the current traffic problems in South Warrington is demonstrated in the ambiguity of the council's transport plans to deal with the addition of thousands of more residents and construction employees, as well as

large vehicles involved in the building works on the roads.

As well as more workers travelling to the area, there will be heavy goods vehicles (HGVs) and thousands of more residents placing demands on the existing road structure. Despite this, there is no proposal about how people will go into town, no intentions to improve the A49 – which is already often congested – and no clear routes for canal crossings, highways or motorway junctions.

South Warrington already has a severe traffic problem, and instead of finding ways to improve congestion, the council is merely exacerbating it. The road network is currently struggling to cope with demand, demonstrated by local MP Faisal Rashid's recent traffic survey on the area.

The existing problem of congestion is so bad, Mr Rashid stated: *"I am regularly contacted by constituents who tell me they are fed-up with the intolerable levels of traffic congestion in Warrington South. The local road and motorway network is already at the point of gridlock during peak times. If there is an incident on the surrounding motorway network, local roads come to a standstill. Traffic congestion is leading to significant delays – even for motorists travelling very short distances."*

7) Not boost Warrington's economy

The plan is not sound in that it fails to support the economy of the town. The residents of the South East Urban Extension will be inclined to look for leisure and retail activities in Manchester, Liverpool, Chester, Northwich and Cheshire Oaks, all of which offer much more than the facilities in Warrington Town centre and are only a relatively short journey time away, because of the three water barriers to the town centre and the heavily congested road network leading to Warrington.

8) Lack of infrastructure

The plan for the South East Urban Extension is not sound, in that it creates a minimum of 4,200 homes, of which approximately 850 will be for rent. The lack of facilities and public transport will have the effect of stranding those who are potentially less well off in areas without accessible facilities to support their needs.

The plan fails to locate those who need services most in the locations close to the town centre where services are available without the requirement for travel by car.

There are no guarantees regarding the infrastructure to support those homes the provision of which are developer dependent. The Plan provides little confidence that the infrastructure will be built ahead of the homes, this is the all

too frequent reality for new communities and I do not see sufficient safeguards in the document to give any credibility to the delivery of the infrastructure required to support these homes.

Warrington needs affordable housing of mixed tenure but this affordable housing needs to be near to the town centre with the facilities of the town centre accessible to those living in affordable housing. The plan does not deliver this in fact its target for affordable housing is only 20% for inner Warrington developments and 30% elsewhere.

9) Failure of Western Link

The proposed addition to the road network known as the Western Link is not sound, and the economic case for this new road crossing of the Manchester Ship Canal and Mersey no longer exists in The Plan. The Western Link will do nothing for connectivity for those residents living to the east of London Road. The Western Link will have the perverse impact of increasing road traffic through Warrington, as motorists seek an alternative to the toll bridges over the Mersey towards Widnes.

10) Air pollution

The plan is not sound, in that it will increase air pollution levels in the already highly polluted areas of Stockton Heath, Latchford and London Road. Any plan cannot be sound in that increases the unacceptable levels of air pollution already experienced in South Warrington.

With already existing traffic problems in the area, it seems incredulous the council would propose to worsen the daily commute – and stress levels – of all its residents.

Thanks to extra traffic on the roads, an increase in pollution on the motorways due to more commuters, and the absence of open countryside – which currently allows gases to disperse – air quality in Warrington will decline quickly.

Despite this, the local authority does not address this issue and offers no serious analysis of air quality impact. Its one air quality monitor in South Warrington only assesses NO₂ and does not even measure particulates. Therefore, it is an unreliable source of information and cannot be used in an argument in favour of the proposals.

Warrington already suffers from very poor air quality, something which it has even [admitted on its website](#).

“In 2015, around 4% of all mortality in Warrington was attributable to man-made particulate pollution, the [Air Quality and Health JSNA, Feb 2018 report \[pdf\]](#) has more detail.

Whilst the majority of Warrington has good air quality, there are areas close to major roads where nitrogen dioxide levels are high and exceed national standards.”

In 2016, Warrington was even picked out by the World Health Organisation (WHO) as the second worst place in the north-west of England for its air quality. Breaching safe levels of small particulates in the air (PM_{2.5}), its pollution levels even came to the attention of local councillors at the time.

Councillor Maureen McLaughlin, executive board member for public health and wellbeing, was reported [by Warrington Worldwide](#) as saying: “Warrington Borough Council takes its responsibility for the health and wellbeing of its residents extremely seriously. We remain determined to tackle the causes of ill health in the borough and that includes air pollution.”

While Warrington Council appears to have now backtracked on its commitment to reducing air pollution in the town, this contradicts recent targets set by Prime Minister Theresa May.

Just this week, she revealed plans to [cut greenhouses gases to zero by 2050](#). This will not be possible if the new proposals in Warrington go ahead, as air quality will actually decline – not improve – as a result of the building work.

This article by the WHO also shows the health implications of poor air quality, revealing pollution kills seven million people a year. It also states one-third of deaths from stroke, lung cancer and heart disease are caused by air pollution.

"This is having an equivalent effect to that of smoking tobacco," the WHO reported.

For non-smokers in Warrington to have to face this "serious" health impact because of the council's inability to address these major air quality problems, let alone worsen it, is unacceptable.

With thousands more vehicles on the road, it is irresponsible to assume air quality will not decline as a result, causing more health problems for residents and more pressure on medical facilities in the area.

11) Diverts investment from town centre

The plan is not sound because it releases greenbelt immediately and will divert investment from the regeneration of the town centre and the Brownfield sites around the town. A sound plan would delay any greenbelt release until at least the first five years of the plan were completed at which time when the plan is reviewed. The significant changes to lifestyles and work patterns caused by Brexit, Covid, and the climate emergency as well as the most up-to-date ONS data may well confirm that no greenbelt release is required to support the growth of Warrington.

A sound plan would preserve the greenbelt when there is so much uncertainty regarding the real future demand for housing in the towns and cities of England.

12) Lack of sustainability

The plan is not sound because it fails to grasp the opportunities and challenges of the 21st-Century. The lack of sustainability of the plan is highlighted by the development of more warehousing facilities on greenbelt land at the 656 employment area. The plan for 656 fails to understand the potential scale for automation of warehousing facilities. The predicted jobs growth is unlikely to happen as warehouse companies automate their processes. The South East Urban Extension creates a huge suburb with connectivity issues to the town centre. The South East Urban Extension is likely to be of residential interest for to people working in Liverpool, Manchester and Chester, creating commuter dormitory wholly car dependent and disconnected from the Town.

The 656 employment development area is not sound, the expectation that people travel to work by walking, cycling and public transport is simply unrealistic. Whatever employment is created at 656 the consequences will be increased motor vehicle traffic movements through the already congested road network of South East Warrington. Employment opportunities need to be created closer to the town centre and sustainable transport links.

The plan is not sound in that it will create material harm to the visual and residential amenity of those already living in Stretton, In particular it will destroy the current views afforded to those entering Warrington from junction 10 of the M56, a view currently across open fields towards Saint Matthews Church which gives the overall impression of entering a rural village environment. The proposed development of this greenbelt land will have the effect of creating a suburban feel the moment one leaves junction 10 of the M56. The release of this land is both unnecessary and damaging to the beauty of the current environment.

13) Residents' quality of life

The plan is not sound in that it will create material harm to the visual and residential amenity of those already living in Stretton. In particular, it will destroy the current views afforded to those entering Warrington from junction 10 of the M56, a view currently across open fields towards Saint Matthews Church, which gives the overall impression of entering a rural village environment. The proposed development of this greenbelt land will have the effect of creating a suburban feel the moment one leaves junction 10 of the M56. The release of this land is both unnecessary and damaging to the beauty of the current environment.

The plan comes only seven years after the last local plan which was meant to last and preserve the greenbelt for 20 years. There are no exceptional circumstances presented in the plan that justify the release of greenbelt.

To progress the plan now is not sound, unjustified and negligent, especially given the government's latest announcements and Michael Gove's comments regarding the protection of the greenbelt and the ending of housing targets.

Regards,

Natasha Holdsworth