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**From:** Robert Harris [REDACTED]  
**Sent:** 15 November 2021 14:57  
**To:** Local Plan  
**Subject:** Warrington Local Plan - 2021

Robert Harris  
[REDACTED]

15th November 2021

Dear Sir

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

I have a number of major concerns in respect of this version of the Local Plan but to begin with I would like to acknowledge the welcome removal of the South West Urban Extension in Walton. The impact of 1,600 houses on Walton and the increase in air pollution generated would have been unacceptable.

I request that Warrington Borough Council challenges government figures on housing number requirements. 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. I believe that a more realistic and achievable target should be set, thus reducing the pressure on the Green Belt. Warrington has never been able to fulfil its house building targets in the past and such an ambitious build out rate would, on past performance, be unattainable. The Plan, therefore, is undeliverable and unsound.

I am pleased to see that the development of brown field sites such as Fiddlers Ferry for housing and employment land is now included in PSV2. If the site is used to its full potential in respect of strategic rail links as well, this will greatly add to Warrington's future economic growth and development.

I am extremely concerned about the apparent lack of strategic transport infrastructure contained within the Plan and would assert that many of the housing developments would add significantly to the current problems suffered by our car dependent town. Local Transport Plan 4 should have been the driver for the Local Plan in order to provide a coherent, multi-modal plan for the whole town.

I am also very concerned that existing traffic 'hot spots' within South Warrington will be adversely impacted by PSV2. These 'hot spots' include Stockton Heath High Street including the Swing Bridge, and the junctions at Lumb Brook Road. The development planned to Stockton Lane will have a significant effect on local road which are already at over capacity at certain times of the day.

The Cat and Lion junction in Stretton has limited capacity for change and the effect of the South West Urban Extension on the local network will be profound. The proposed 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.. Any distributor road should connect directly to the M56 so as to reduce 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 from Stretton, Appleton Thorn, Hatton and Higher Walton. It will increase local journey times, distances and air pollution

The lack of emphasis on a multi-modal and fully integrated strategic transport network meant that most of the proposed new housing developments in South Warrington will not be sustainable. There has been a lack of vision and an over-reliance on old 'New Town' planning principles as the focus is still on building satellite housing developments (Garden Suburbs) . There is a significant lack of credible public transport options that would support such large housing numbers in this area.

I do not feel that PSV2 is in line with with NPPF policies stating that plans should 'be prepared positively, in a way that is aspirational but deliverable " .

I am very concerned that the Western Link is still in PSV2 . The last Local Plan stated that the South Western Urban Extension was the ' trigger' for the Western Link and it 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 .

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.

Inevitably the construction of the Western Link will shortly lead to a widening of Cromwell Avenue so that there will be a direct link between the A56 and the M62 . It will create Warrington's own version of the M25 or M60 ! As a town , Warrington does not need such a ring road .

The 'controlled junction' on the A56 will severely impact on the character of a semi-rural area and there will inevitably be increased traffic thereby increasing air pollution in the area.

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.

Warrington Borough Council has a responsibility to protect the health of its residents. The death of Ella Kissi-Debra in London showed that there is a direct effect on population health and air quality. 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. PSV2 continues to encourage car dependency and Warrington Borough Council does not have a robust air quality monitoring within the town . 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.

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

To summarise I contend that the projected housing numbers put forward in PSV2 are not deliverable; the transport infrastructure requires a complete strategic review which will enable housing development on brown field sites first before green belt land is considered; the business case to continue with the Western Link must be re-assessed. In addition, air quality considerations must be at the forefront of any plan as the current lack of reliable air quality data makes the Local Plan unsafe for current residents, their children and grandchildren.

I do not consider that this Local Plan is sound and deliverable. I do not believe it adheres to the National Planning Policy Framework which states that :-

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.'

Yours faithfully

Robert Harris

[Redacted signature and contact information]