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From: Annie Devaux [REDACTED]
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To: Local Plan
Subject: Local plan

The revised local plan does not provide the necessary justifications to support the numbers nor the proposed decimation of the Green Belt, and is therefore undeliverable and not sound.

- 1. There is no no need for the volume of housing proposed - the housing needs forecasted are based on out of date figures from 2014, not the more recent and lower figures from 2018.

- Also the planned annual delivery rate has never been achieved in Warrington and is therefore unrealistic.

- Much of the economic growth forecast appears to be based from planned housing development rather than the other way round.

- 2. The housing plans are flawed - as mentioned above, the planned housing numbers are overly inflated which creates “fake demand” to release green belt land.

- Affordable housing and housing for those aged 65+ needs to be near appropriate facilities, with good transport links. A large proportion of the proposed housing is planned to come from the South East Warrington Urban area (43%). This will do little to meet the needs of either of these groups, which will depend heavily on public transport - something which is severely lacking both now and in the Plan.

- The volume of housing planned in this area will also result in large increases to road traffic on an already struggling infrastructure, and an area already suffering from poor air quality.

- To access the town centre or train stations, residents of the new South East Warrington Urban area will need to use cars, which will add to car use across the town and the already overstretched Bridgewater & Manchester Ship canals crossings.

- 3. There is no adequate provision for transport infrastructure improvements to support the planned developments - as mentioned above, the plan places an increased reliance on road transport, on an already poor infrastructure which is restricted by being surrounded by motorways and split not only by the river Mersey but also the Bridgewater and Manchester Ship Canals.

- In order to access the town centre, residents from the new developments in South Warrington (and commuters from surrounding areas travelling North/South across Warrington) are utterly reliant on just 4 crossing points - 3 old swing bridges, which are at the mercy of shipping on the canal, and a restricted weight cantilever bridge, all of which are single carriage way. As a result there are already huge pressures on these pinch points, which are heavily congested and grind to a halt whenever there is an incident on any of these routes, or one of the surrounding motorways, causing the town and the other crossings to also gridlock.

- In addition to this, residents in the planned South East Warrington Urban area (which accounts for the vast majority of the development in South Warrington) will also need to cross the Bridgewater Canal. The options here are even more restricted – up Lumb Brook Road through a minimum of 3 sets of lights within 200m of each other, including a single track segment through the bridge under the canal; via the A49, through the busy and overly congested village of Stockton Heath; or over a single track humpback bridge further to the East (Church Lane) or West (Red Lane)

- The plan contains nothing to improve the number or capacity of any of these already over-stretched crossing points, either over the Ship Canal or the Bridgewater Canal

- There is reference to the ‘Western Link’ planned further to the West but this is not guaranteed – and its future is looking increasingly doubtful due to cost challenges and the removal of Port Warrington & the South Western Urban Expansion from the plans - and anyways would do nothing for existing and future residents wanting to go to the town centre or its train stations from the South East Warrington Urban area

- The transport plans are too vague and any improvements planned are not even guaranteed to be in place before houses are built and add to the existing nightmare.

- 4. The volume of employment land proposed is also not justifiable.

Half of the employment land is planned to be located at the junction of the M6/M56, a junction which is already overloaded, and liable to extensive impact whenever there are incidents on either of the adjoining motorways, or indeed the junction itself (overtaken lorries are not an infrequent occurrence)

- This is a significant amount of land, most of it Green Belt, which will be used primarily for logistics - which we know will significantly increase road traffic and air pollution in the area, and increase the number of lorries using Appleton Thorne as a rat run, as they already do, especially when there are incidents on the motorway - and warehousing, much of which is likely to be heavily automated and hence not actually create many high quality jobs, especially in comparison to the amount, and nature, of the land being sacrificed.

- Given the location and lack of public transport links (a proposed bus service will do little to support this employment area as it is likely to be heavily shift focused and hence any bus service is unlikely to be able to provide the necessary round the clock access that would be needed to be a viable alternative), workers will need to commute by road, adding to the traffic and local infrastructure pressure points

- 5. There is no justification for the proposed scale of Green Belt release, which is irreversible. It should be an absolute last resort.

The plan does not offer sufficient evidence or assurances to demonstrate that all brownfield sites have been fully considered and will be exhausted first before offering up valuable and cherished Green Belt land.

- Green Belt land will be highly sought after by developers who will pursue this in favour of other development land but there is no clear detail of how the council will ensure that this land will only be released if absolutely required, as a last resort

- By definition, land identified as Green Belt should only be released if it fulfills one of a number of pre-defined “exceptional circumstances”. The plan does not provide sufficient evidence to demonstrate that any of this criteria has been met, which would justify the permanent sacrifice of 1400 acres of our precious Green Belt.

- The existing Green Belt boundaries was only set up 7 years ago, with a 20 year status. There is insufficient justification to be challenging this boundary already.

- 6. Air Quality, which is already poor, will be adversely impacted by the plan. Warrington is surrounded on 3 sides by motorways. The planned development in South East Warrington is near the corner of the M6/M56 intersection which is already an area of poor air quality (2018 Public Health report, and reinforced by Warrington being highlighted as an Area of Concern by the World Health Organisation). As highlighted further above, the additional traffic and subsequent congestion that will result from this development, and subsequent congestion that will result, together with the loss of Green Belt, will without doubt lead to even poorer air quality in the South Warrington area and town centre.

- One of the actions identified in the Air Quality Action Plan was to reduce traffic. This Local Plan will deliver a substantial increase as the new housing will be car dependent, due to a lack of alternative public transport provision.

- Increased emissions from cars, loss of Green Belt and biodiversity, poorer air quality, are also inconsistent with other local and national government policies relating to the preserving and protecting the environment , improving people's health, and efforts to mitigate climate change.

- 7. There has been no proper assessment of the environmental and ecological impact of the plan and the proposed loss of Green Belt

- The Plan fails to protect and puts at risk of harm key ecological habitats, ancient and irreplaceable woodlands (Fords Rough, and part of The Dingle), and important wildlife sites in the South East Warrington Urban area which will be adversely impacted by the proposed housing, and threatens the biodiversity of the Blu Canal which will cause irreparable harm.

The plan is therefore not sound:

- no justification for volume of housing & employment

- no justification for volume of Green Belt release proposed

- no justification for predicted growth

- fails to protect the landscape and character of the Local villages

- not sustainable with the lack of transport infrastructure being proposed (which is very little!), which needs to be improved before the developments begin in South Warrington to address the existing issues.

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