

# Proposed Submission Version Local Plan

## PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

**Name of person completing the form:** Alan Hilton

**Email address:** [REDACTED]

2. What type of respondent are you? Please select one option only.  
If you are an agent please select the type of client you are representing.

A local resident who lives in Warrington

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	-
<b>Agent name (if applicable)</b>	-
<b>Address 1</b>	[REDACTED]
<b>Address 2</b>	[REDACTED]
<b>Postal Town</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone number</b>	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

None of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
<b>Legally Compliant</b>		
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>		

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

I am responding to the invitation to consult on the revised proposed plan for Warrington in my capacity as a resident of [REDACTED] in the South of Warrington who would be affected by the proposed South East Warrington Urban Extension centred around Stretton, Grappenhall Heys and Appleton Thorn and the new employment land proposed within the area adjacent to where the M6 crosses the M56 in the proximity of Appleton Thorn.

For context, I would note the following about the South of Warrington (by which I mean South of the Manchester ship canal) and the rest of Warrington which have been formed by living in [REDACTED] for the last c. 10 years (and previously living in the North of the town in [REDACTED]):

- Access to the North of the town is materially reliant on road travel but this is naturally contained by the Bridgewater Canal, the Manchester Ship Canal and the River Mersey.
- Road crossings for the Bridgewater Canal within the urban area are focused on the A56, Red Lane (single carriageway), London Road, Lumb Brook Road (single carriageway) and Knutsford Road.
- The Manchester Ship Canal is crossed by ageing swing bridges on the A56 (Walton), A49 (Stockton Heath) and A50 (Latchford) in addition to a high level fixed bridge known as the 'Cantilever Bridge' although this has limited load bearing capacity and is narrow. At peak travel times, these routes become heavily congested with associated pollution issues. With 3/4 of these crossings being swing bridges, the road capacity to the North of Warrington is materially impaired whenever a ship transits the Ship Canal.
- The River Mersey can be crossed at Bridgefoot Island in the town centre (an extremely busy junction), via the new bypass which connects the A56 to Wilson Patten Street (already a busy road), via Kingsway (A50) or via the M6 (Thelwall Viaduct). Again, these routes become heavily congested at peak travel times.
- The South of Warrington is home to many professionals and other workers who commute to Manchester or Liverpool and rely on the road network to commute directly or to travel to train stations.
- The South of Warrington has no immediate connectivity to the train network whereas the North of Warrington benefits from Warrington Bank Quay, Warrington Central, Padgate, Birchwood and Great Sankey train stations. People living in the South wishing to commute to Manchester or Liverpool by train need to travel by road, crossing both the Bridgewater Canal, Ship Canal and the Mersey, to get to a station.
- The South of Warrington has significantly less facilities than across the North – there is one old leisure centre in the South (Broomfields which has not had any recent comprehensive refurbishment) whereas in the North there 3 (Woolston, Orford Jubilee – newly built in 2012, and Great Sankey – comprehensively redeveloped in 2018).
- In addition, the majority of the town's retail provision (the town centre, all out-of-town bulky goods retail parks and all the supermarkets) are located in the North as are all current petrol stations.
- These facts add pressure to the need for regular travel across the Bridgewater Canal, the Ship Canal and River Mersey by road (car or bus).
- The area is bounded to the South by the M56 and to the East by the M6 motorways. At peak travel times, these motorways are already operating at in excess of design capacity as several miles of queuing traffic (stop / start movement) is typical on a daily basis inbound to Manchester on the M56 (approaching junction 7) and over the Thelwall viaduct (such heavy traffic not being dependent on accidents or broken down vehicles – it is pure weight of traffic). The nature of such heavy traffic leads to increased amounts of exhaust emissions / pollution compared to freely moving traffic.
- Given its position, when the M6 is heavily congested, motorway traffic has a habit of using Warrington as an alternative route (typically from the M56 to the M62 via the A49) which can cause significant additional local congestion.
- Any proposals to improve motorway junctions will not alleviate the fundamental fact that the local motorways cannot sustain increased volumes of traffic without consequences.

- Overall, I would consider that existing infrastructure is already stretched beyond its original design capacities and adversely impacts on the quality of life of existing residents.
- Noting the above, I would comment on the Council's revised proposals for the South of Warrington which are summarised as a minimum of 4,200 houses and new employment land as follows:
- The Council's numbers for housing need which underpin the justification it presents to release greenbelt for development are aggressive being predicated on assumptions which exceed historical performance. It is difficult to see how such forecasting can meet the exceptional need test required to release greenbelt land for development.
  - The nature of the local housing market is such that, even at a discount to market value to provide 'affordable' housing, it is likely that the type of employees who will work in the new Employment Area will not be able to afford to live in close proximity to their new jobs and hence would need to commute across Warrington adding to existing traffic problems. I would consider this to be unsustainable and not sound.
  - The plan offers little detail to highlight what research has been conducted to determine the type of growth Warrington will experience generally and the type of jobs that this growth will produce and hence the price points of future housing need that can be afforded. This leads me to be unclear as to the type of housing the Council envisages for the South of Warrington. Possibilities that occur to me include:
    - o In order to ensure houses are genuinely affordable, the Council opts to facilitate the development of housing which will be focused on high density, smaller houses which will change the character of the area which would be in conflict with one of the Council's own policy objectives to maintain (page 21 of the plan "Vision – Warrington 2038 and beyond" – point 6 "The character of Warrington's places will be maintained...."). Furthermore, most commercial employment is located in the North of Warrington than the South and so will add to the need for local travel and congestion / pollution.
    - o The alternative is that the growth of residential accommodation will focus on larger 3-5 bed houses which will align with much of the existing housing stock and will probably sell to people who do not work in Warrington and who will commute, further exacerbating the broader reliance on car travel / congestion and pollution issues.
  - The growth is noted to be a MINIMUM of 4,200 new homes. This concerns me greatly. Aside from this already being a number which I would consider to be unsustainable for reasons outlined above and below, the wording would permit even more homes to be built in the South. This is clearly going to lead to materially increased population in the South of Warrington and, assuming car ownership of, say, 1.5 per household, could ultimately imply 6,300+ additional cars which will add further pressure to the road network given the need to travel to the North to access municipal facilities, the rail network, jobs and retail. The Council's proposals to promote walking and cycle use are naive in the context of the relative location of the proposed development with town facilities, likely work destinations and the stations on the rail network.
  - The failure to make proposals to connect the South of Warrington to the rail network in the context of the proposed concentration of development in the South fails to address the Council's own stated priorities to reduce car travel and improve air quality (Policy INF1). I would consider this to be unsustainable and not sound.
  - The Council's proposals on road improvements are vague and offer limited detail in respect of the source of funding and relative timing for the delivery of major infrastructure improvements (which would need to include new crossings over the Canals and Mersey) relative to housebuilding. I must be clear, the South of Warrington needs significant infrastructure expenditure PRIOR to new housing development. As proposed, I would consider this to be unsustainable and not sound.
  - Whilst the Council refers to new roads these would seem to link to existing main roads in the area. This will just route significant new traffic into existing neighbourhoods and put pressure onto the already busy Canal / River crossings. I would consider this to be unsustainable and not sound.
  - The Council's attempts to increase bus use does not solve the wider issue of existing road congestion which clearly impacts all road borne public transport. I would consider this to be unsustainable and not sound.
  - The new Employment Area will add directly to traffic issues due to the increased volumes of HGVs etc. I would consider this to be unsustainable and not sound and in conflict with Council policies.
  - I understand that commercial development will be based around the logistics industry – this is a sector which produces modest numbers of jobs relative to the floor area of development (and hence land consumption) and these are usually relatively poorly paid providing limited economic benefit. Furthermore it is not apparent that Warrington needs logistics operations to serve its own needs.
  - These aforementioned points do not in my mind meet the exceptional need test required to release land for from the greenbelt for this type of commercial development. I therefore consider this to be unsustainable and not sound.
  - Clearly, the loss of greenbelt in itself is directly environmentally damaging and creates a loss of amenity.
  - The latter point in conjunction with material increase in road traffic which I believe would be an undoubted product of the plan are completely at odds with the Council's objective W6 "minimum impact of development on the environment...ensure development... makes a positive contribution to improving Warrington's air quality" reinforced by the principles laid out in policy ENV8. The reality, rather than having a positive impact, will have a clear negative impact. I would consider this to be

unsustainable and not sound.

- This plan also seems to contradict the Council's own moves to declare a "Climate Change Emergency" in 2019 and more recently an "Ecological Emergency".
- The Council has stated that alternatives were discounted due to impact on the character of existing settlements and increase in car trips – as expressed above, both are prevalent reasons to object to the subject proposals for the South of Warrington.
- I would also observe that Warrington is constrained by motorways to the north, east and south of the town with the towns of Runcorn and Widnes to the west. If the only way to expand is to release greenbelt, maybe the question which should be addressed is whether Warrington is reaching its 'design limitations' and cannot accommodate material further growth.

In summary, the proposed plan highlights that the Council wants to focus population growth on the side of Warrington which has least facilities and where travel to access retail, supermarkets, leisure facilities, petrol stations, jobs etc is constrained by the existence of 2 canals and a river which intersect the town and where there is a reliance on road borne transport and a limited number of already busy routes. This makes the South of Warrington manifestly unsuitable for major development activity unless major infrastructure is guaranteed to take place ahead of new housing and which must include high capacity new crossings over all 3 waterways. The proposals will cause substantial change in character for the area, additional congestion and deterioration in air quality. The release of greenbelt for development requires exceptional need. I cannot see how exceptional need is demonstrated by forecasting at levels which exceeds historical numbers and for low quality / low volume job creation for logistics purposes. I therefore regard the plan to be unsustainable and not sound and continue to object to it in the strongest terms.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

See earlier comments

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**