




28th September 2017

Good Morning

**Warrington Borough Council (WBC) Local Plan Preferred Development Option (PDO)
Regulation 18 Consultation Response**

Cc: Faisal Rashid MP, Councillor Hans Mundry and Councillor Karen Mundry

Introduction

I'm writing regarding the WBC Local Plan Preferred Development Option Regulation 18 Consultation. Please be advised that this is my formal response and compliments all previous dialogue be that email, letter, face-to-face discussions or an earlier submission via WBC Standard Reply Form. The earlier submission WBC Standard Reply Form should be consigned to the bin as it was completed early on, with little consideration, when I was extremely angry.

This ridiculous PDO has taken up a significant amount of my personal time in the evenings/weekends and is causing great worry to myself and other residents throughout Warrington. Furthermore, we seem to be getting no support from our local elected Councillors.

Of particular concern is the Trans Pennine Trail (TPT) and Latchford railway embankment both of which have in part been identified by WBC as having the potential to provide a '*new strategic road/public transport link*' and proposals to destroy the Green Belt and degrade the environment in general.

Firstly, a few words on the Consultation process.

Consultation Process and Documentation Presentation Standards

It is considered that the Consultation is ill-conceived and short, undertaken when many people are away on holiday. The majority of people only found out about the Consultation via a flyer provided by a local protest group. I'm aware that the Consultation has been extended by WBC by two weeks until 29th September. However, no further Consultation events are included as part of that extension. This is despite people not being able to gain access at the Park Royal event on Monday 4th September 2017. It is obvious the venue was inappropriate due to the lengthy queues outside and the small, hot and crowded conditions inside.

Hardly any of the plans provided as part of the Consultation show settlements, road locations or other key elements as being labelled e.g. Figures 7, 8a, 8b and 9. The keys on the plans are incomplete and do not cross-reference to all the elements shown on the plan. Scale bars are inaccurate or not present and many of the plans have no north arrow. Until the documents

are at legible scale and allow the reader to orientate themselves, I consider the Consultation as inadequate.

The quality of consultation with the public has been unsatisfactory such that the draft proposals give the appearance of being set in stone as a *fait accompli* to be tinkered with. Planning Officers advising that it is 'just ideas' does little to ease the worries of residents who will be directly or indirectly blighted by such proposals. The so called Consultation is tokenism and clearly a tick box exercise designed to allow WBC to jump legal hurdles that will undoubtedly come their way.

Residents have not been consulted upon the framing of any plan aims, principles, values or proposals for Warrington. The public have been put in the negative position solely as objectors rather than as contributors to the purposes and aims of the plan. This is not acceptable; it is the residents of Warrington who have to live with these proposals rather than the consultants who produced them or the Planning Officers who sanctioned them.

The current PDO proposals are already causing considerable blight to surrounding houses and neighbourhoods and will erode the community feel which attracts and retains residents in the areas around Warrington.

Environment and Green Belt

Reading through WBC existing and current Local Plan Core Strategy (Adopted July 2014), there appear to be a number of discrepancies between existing adopted Policies and 'ideas' as set out in the PDO, particularly in relation to the environment. I'm not going to list them all, I have better things to do than unpaid responses to illegible documents produced on behalf of WBC. We'll save deep scrutiny for the Planning Inspection. As an example; Policy CS6 Overall Spatial Strategy – Strategic Green Link notes both the TPT and Sankey Valley Park (SVP) as Strategic Green Links. With respect to the TPT the PDO appears to contradict Policy CS6 as Figure 7 indicates that in part the TPT will be destroyed to provide a '*new strategic road/public transport link*'. One step further on is the recently announced Red Route Western Link which will fragment both SVP and Moore Nature Reserve.

It appears therefore that WBC pays lip service to the environment advising it is committed to supporting wider programmes and initiatives which seek to connect the Borough's Strategic Green Links with employment areas, residential communities, and Green Infrastructure (GI) Assets. Yet in reality it seeks to decimate and fragment GI assets such as the TPT, SVP, Moore Nature Reserve and not least of all Latchford Railway Embankment.

WBC does not demonstrate commitment to the environment, having no in house suitably qualified local ecologists or landscape architects to oversee and comment on planning submissions or Local Policies and the PDO.

Transport

Latchford Railway Embankment has excellent connections to the TPT, Lymm, Dunham, Altrincham and beyond to the east of the United Kingdom. It also has the potential to provide a green non-motorised user route into Warrington town centre once the railway becomes fully redundant when Fiddlers Ferry closes. The Fiddlers Ferry site itself will become available in the near future and SHOULD be used in any calculation of brownfield availability.

There is no detailed transportation / traffic / road infrastructure discussion in the PDO, or evidence of any computer modelling and analysis of the environmental, road widening or social impact of this 'development' plan throughout the borough. Latchford and surrounding residential areas will be decimated and uninhabitable.

Latchford Village is already a traffic island. Importantly, Figure 7 indicates a sweeping major north/south arterial road along the high - level railway alignment which ends up in Latchford and also, significantly negatively affects south Thelwall.

Stockton Heath Village will experience significant increase in traffic from both Knutsford Road, Grappenhall which are identified as a major artery via Ackers Road and Grappenhall Road the canal-side section of which will be a rat – run to Stockton Heath)

London Road via Stockton Heath will be experience even more Traffic

Walton Road (as an extension of Grappenhall Road) will also experience increase in traffic as it connects the above roads to the Stag Pub Junction for the proposed Western bypass to Liverpool Road.

Red Lane / Windmill Lane / Quarry Lane / west end of Whitefield Road, Hill Cliffe Road will become even more of a rat – run owing to its cross – road connection with Lyons Lane.

Lumb Brook Road and Bridge Lane are defined as major arteries to connect with the newly opened (now closed) Stockton Lane. These three roads will converge at Lumb Brook Bridge.

Grappenhall Hump Back Bridge will also experience significant pressure

WBC are likely to advocate extensive road-works in the town on the basis of the proposed urban sprawl outlined in the PDO. Road works are primarily controlled by highways authorities, not planning authorities and legislation. There is the danger that the road-works will go ahead regardless.

No evidence of bus companies and operators appear to have been consulted or that public transport has been part of the considered integral infrastructure.

Housing Numbers – Calculation Methodology

On housing numbers, the Secretary of State for Communities & Local Government, the Rt Hon Sajid Javid MP recently unveiled (14th September 2017) a new methodology for calculating housing demand, quoting;

“The existing system for determining [housing demand] simply isn’t good enough. It relies on assessments from local authorities according to their own requirements carried out by expensive consultants using their own methodology. The result is an opaque mishmash of different figures that are consistent only in their complexity.”

A WBC representative on behalf of Any Farrell responded advising the following with regard the recent announcement from the Rt Hon Sajid Javid MP.

“Under the proposed methodology our (Warrington) local housing need figure is calculated at 914 homes per annum. This is based on an annual average increase in projected households of 810 calculated over the period 2016-2016...”

...it should be noted that the new methodology is supportive of councils uplifting their housing targets above the minimum figure if they have ambition to increase employment and jobs in their areas.”

However, WBC have chosen to go with the period of 2016-2026 to get their 810 baseline for this response The 914 number also includes the affordability adjustment which will probably be challenged as part of the Government's formula calculation as being overly simplistic a definition of affordability as it ignores deposits, lifestyle choices, housing types.

This is because the average rate tails off in later years in the underlying ONS tables and the average over the period to 2039 is not 810 but actually only 716 houses per annum (even allowing for the higher rate in the first ten years).

Now the PDO is proposed to be a twenty year plan WBC should be using the longer term (and lower) baseline. Likewise any number above this (and even the baseline itself) still requires economic growth to sustain and justify, which seems to have been overlooked by the council in trying to justify an even higher target. Alternatively if WBC were to use a ten year number, then the PDO should only run till 2026.

In either case WBC will end up with a much smaller total housing requirement, all of which, as advised in my letter dated 15th September 2017 could be satisfied by brownfield regeneration alone.

Further, the employment openings being offered by the PDO are in the majority as warehouse operatives in an extension of the Barleycastle trading estate. I'm not sure these salaries will cover a mortgage for one of the proposed 9000 houses on Green Belt priced at 400k plus.

Landscape Design

The PDO hardly refers to Warrington north of the Manchester Ship Canal where quality of landscape design; street-scape and open space should be a top priority. The town and inner urban areas are in dire need of very high quality urban design which respects Warrington's unique historic architectural qualities. Over the years, development control, enforcement and highway works have done little to improve the quality and attractiveness of Warrington. The town centre should create pride and identity with Warrington.

WBC has had difficulty in demonstrating sufficiently this ambition and capability, having long since released the services of an in-house landscape architect. The quality of the new constructions in the town centre and of development control and enforcement have not harmonised with the traditional historic character and scale of the town centre. e.g. Shed shops along Winwick Road and Cockhedge, poor shop fronts e.g. Bridge Street, Dial Street, Church Street, Orford Lane, Lovely Lane, Padgate Lane, Latchford Village, Stockton Heath Conservation Area, etc. The only recent large landscape scale works of any merit is the ongoing flood defence works currently being overseen by the Environment Agency.

In summary, based on previous housing layouts and urban design in Warrington, I have little confidence that WBC and especially their preferred consultants/building contractors will deliver a habitable and pleasant environment in which to live, work and play.

The scale of the proposals is developer led and will lead to a degrading of the living environment for Warrington residents throughout the Borough. Be assured, if WBC carry on with their proposals to degrade our living environment we will challenge you right every step of the way.

