



Warrington Borough Council,
Planning Policy and Programmes,
New Town House,
Buttermarket Street,
Warrington,
Cheshire,
WA1 2NH.

27 September 2017

Dear Sirs

Re: Warrington Borough Local plan Review 2017

It is a matter of grave concern that Warrington Borough Council [WBC] appears to have attempted to obstruct, deceive and evade proper public and local parish council scrutiny, input and consultation by publishing the Local Development Plan 2017 [LDP] the height of summer holiday season in August with a deadline of 18th September when it was fully aware that the parish councils do not hold meetings during August. This appears to be a clear and present intention by WBC to obstruct, interfere and frustrate the proper democratic processes. The extension of the deadline by a two weeks is still inadequate for proper scrutiny and is an admission of malpractice and maladministration.

This clearly follows the WBC's panic over the huge upsurge of local protest following the Homes and Communities Agency [HCA] plans for a further 1,000 houses in South Warrington. WBC clearly misjudged the level of concern in South Warrington and realised that the LDP is unsustainable locally. This is further evidence of poor management, direction and corporate governance in WBC.

This is not an effective or viable LDP: it totally fails to enunciate any strategy to address the crisis caused by of 40 years of massive housing development without the necessary infrastructure; especially that needed to resolve Warrington's traffic problems and the endless gridlock that is damaging the environment for all residents and economic progress today, problems that will escalate exponentially if it is implemented.

This appears to be a massive housing proposal prepared by greedy landowners and rapacious developers whose sole objective is the maximisation of their profit at the expense of everyone living and working in Warrington. There is cynical reference to the need for infrastructure without any detailed plans as to where, when or how this will be achieved or financed. Furthermore, landowners and developers are adept at mitigating and evading the requirements of Section 106 of the Town and Country Planning Act 1990.



Warrington has 40 years' experience of the failed infrastructure promises from the Warrington and Runcorn Development Corporation [WRDA] and its successors. Believing that rapacious land owners and predatory developers will provide infrastructure funding of any description is naive beyond reason. WBC should be seeking repatriation of the vast profits from land sales by the WRDC and its successors to provide much of the planned, but never delivered, infrastructure in the original new town plans.

The most critical immediate and long term facing Warrington is the lack of effective road infrastructure to overcome the barrier of the Manchester Ship Canal to north-south traffic flows and the lack on east-west links connecting the existing new town areas north of the Ship Canal with the town centre and each other. As a consequence of the WBC's planning and economic development failures, Warrington is a disconnected collection of old and new urban sprawl that lacks proper integration or connections. No further housing or industrial development should be sanctioned until these deficits have been rectified.

This situation would not have arisen had the plan for a network of north-south and east-west expressways to link the new town areas with each other and, most importantly, the town centre identified as essential in the Commission for the New Town's original plans. WBC's failure to aggressively pursue these essential plans has resulted in the town's current endless congestion and gridlock problems and is now strangling economic growth.

The LDP housing estimates are absurdly distorted by calculations based on the vain and pointless politically motivated desire for city status and wildly optimistic projections of exponential economic growth. City status is purely ceremonial and confers no intrinsic economic benefit on an existing area. Any economic benefit is entirely the consequence of economic factors that exist before the granting of city status. City status may well be of great financial benefit to the town hall bureaucrats and the political elite, but it will be of zero benefit to the residents and is likely to bring unwanted and unnecessary expense, especially considering the legendary profligacy of WBC.

The LDP also fails to take account of the following critical factors that will impact heavily on Warrington during the planning period, or makes any proposal as to how these will be managed and ameliorated.

- The loss of direct rail services to London as a result of being bypassed by HS2
- The economic windfall to Runcorn and Wigan as result of having HS2 stations with high speed services to London, which will draw industry and commerce away from Warrington
- The potential impact of Trans Pennine electrification on diverting the Trans Pennine express and East Midlands Trains away from Warrington Central

- The escalating impact of increased Manchester Ship Canal bridge openings on the endemic gridlock in the town as a result of the container ports at Irlam and Salford becoming fully operational

Analysis and discussion

The following is an assessment of the Local Development Plan 2017 against the requirements of the National Planning Guidelines 2012.

Section 17 states:

- *Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- The LDP is purely a re-hash of the bulk housing developments without infrastructure inflicted by the WRDC and its successors since the New Town's inception to the detriment of the people of Warrington.
- Over the last 40 years three large, disconnected areas of housing and industrial development have already been created around the periphery of the borough that lack any integration with the old town or each other.
- Abysmal transport infrastructure has resulted in these areas effectively becoming commuter dormitories for people working outside of Warrington who are now increasingly spending their incomes outside of the town to its detriment.
- A genuine LDP would have a plan to resolve the existing growth limiting problems with details, costings and timelines with potential housing developments indicated along the timelines.
- *Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;*
- WBC has consistently failed to do this and the lack of integration between the new town areas and the old town and the town centre has

resulted in the paradox that Warrington is simultaneously an area of high income in the dormitory areas and high deprivation in the old town areas.

- The original New Town plans identified the south bank of the Mersey Valley as valuable rural asset for the town: *'to the south, the vegetation is much more typical of the English 'pastoral' landscape ... the valleys of the Lumb and Dipping Brooks and the sweep of land south of the Bridgewater Canal provide a rich continuity and variety of luxuriant landscape'*.
- This LDP is probably unique nationally in that it in an act of political vandalism it deliberately targets the area of green belt identified as outstanding for large scale destruction.

Section 20 states

- *To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.*
- Because of their location close to the major national east-west/north-south crossroads of the M6, M56 and M62 the existing industrial areas have become a magnet for large distribution companies that provide small numbers of low skilled, poorly paid jobs with poor employment practices.
- The loss of traditional industrial employment has not been mitigated by new commerce and industry and there are no coherent plans to attract appropriate and adequate work for those who have been displaced. This is a staggering defect in the LDP
- Residents in the new town areas are predominantly skilled technical, managerial and professional workers who commute out of Warrington for work because there is a lack of appropriate commercial and industrial operations within the town. There is no plan to reverse this trend by creating a 21st Century economy indeed the LDP does not appear to have an economic strategy other than creating another motorway junction distribution park in the south..

Section 21 States:

- *Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- There is no attempt in the LDP to quantify the skill levels, work locations and work types of the Warrington's population and a total absence of any coherent plan to discourage commuting out of the town by attracting sunrise, high-tech and research based industries which would attract

service and production companies to expand the spectrum of employment.

- The LDP is notable for its absence of vision or any understanding of sustainable economic growth. Instead it seeks to replicate the failed strategies of the 1980's
- *Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
- The major town centre employers are WBC and the retail sector which is rapidly declining as a result of congestion and peripheral retail parks.
- WBC has enthusiastically promoted out of town retail parks at the expense of the town centre and has no strategy to attract commercial enterprises that will support the town centre shops. Indeed there is no strategy in the LDP to attract commerce to the town centre.
- *Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*
- A key priority should be to exploit the high quality residential environment in South Warrington to create a "Science Park" for research, "sunrise" high-tech, pharma, bio-medical and bio-science industries that will reduce commuting out of Warrington and will catalyse higher quality service and manufacturing jobs for the depressed old town areas.
- Consideration should be given to the possibility for using the remains of the old Stretton Airfield south of the M56, which is effectively unused low quality brown field land, as the site of the science park.
- This would offer a considerable saving of high quality agricultural land and reduce the wholesale rape of green belt land in South Warrington envisaged in the LDP and of great benefit to landowners and developers.

Section 23 states

- *Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.*
- The endemic congestion and gridlock mean that Warrington centre is frequently inaccessible to residents let alone people from the wider area
- Warrington has become a series of isolated urban sprawls with an inaccessible and decaying centre: it is a town that people shun and

avoid, only the terminally deluded would consider it deserving of city status

- Marks and Spencer are still the retail bellwether for the health of the high street; their hasty exit from the town centre is a damning judgement on the town centre's future retail potential locally and in the wider area
- The town centre has entered the downward spiral of degeneration with a future of boarded-up retail voids, payday loan merchants, pound shops, charity shops, betting shops, amusement arcades, pawnbrokers, burger bars and night-time drinking dens
- *Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- The lack of easy access to the town centre from the dormitory new town areas means that the old town centre increasingly has little relevance to these areas. Their populations are cosmopolitan and effortlessly adapt to using the vibrant and thriving traditional cultural and commercial centres in Manchester, Liverpool and Chester rather the dreary, downbeat town centre increasingly populated by retail voids.
- Compared to Stockton Heath, Croft or Culcheth, and Lymm, which are genuine social and cultural centres, the town centre is a high risk area at night in which a culture of drunkenness and violence predominates
- The only cultural development envisaged for the town centre is a multiplex cinema. The existing cinema complex at the Westbrook Centre on the North side of the town is more accessible. For those in South Warrington access to the town centre is a perennial nightmare and the new multiplex in Northwich is more accessible.
- If the town centre is the heart of the community it has suffered a fatal infarct.

Section 28 states:

- *Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.*
- The LDP has no viable or coherent strategy to revive the dying town centre and seeks to deny that the main cause of its decline is the endemic congestion that is strangling retail, commercial and cultural growth and development.
- The town centre will continue its death dive until there is a coherent strategy and action to relieve congestion and gridlock, especially along the critical A49 corridor which spreads congestion and paralysis right across the town.

Section 30 states:

- *Promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*
- Although this refers to villages it is also appropriate to the massive new town areas which lack any genuine, thriving, local centres like Stockton Heath, Lymm, Croft or Culcheth. There are gratuitous references to such facilities in the plan, but the evidence of the past 40 years is that these will be nothing more than a convenience store and small, which will be a night-time theme park for teenage antisocial behaviour.
- There is no evidence of any coherent strategy in the LDP to create socially, culturally and commercially viable and cohesive centres like Stockton Heath, Lymm, Croft or Culcheth in the existing new town areas, which are grossly deficient, or in the projected new developments.
- Stockton Heath is not mentioned specifically in the LDP, but the adverse impact of the Garden City Suburb and the Warrington South West Extension on this village will be enormous, particularly on the limited off-street parking.
- The traffic lights at the junction of the A49 and the A56 in Stockton Heath are already operating at capacity and the A49 flowing through the village is frequently at a standstill, a situation that is likely to dramatically increase with increased canal traffic.
- Air pollution around London Road in Stockton Heath is a major health hazard, particularly from oxides of nitrogen; WBC's devious refusal to conduct monitoring is a tacit admission that levels are highly likely to be currently illegal.

Section 32 states:

All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- *safe and suitable access to the site can be achieved for all people; and*
- *improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development*

should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

- This section is particularly relevant to the plans for massive development in South Warrington. The extent of the existing traffic problems in South Warrington and its massive impact on the southern end of the A49 corridor make more development in South Warrington a major catastrophe that will ricochet into the town centre and North Warrington.
- Without major construction of a north-south relief road that diverts traffic away from Stockton Heath, the Ship Canal swing bridges and the Bridgefoot bottleneck any additional development in Appleton, Grappenhall, Stretton and Hatton is totally contraindicated, and this includes the planned HCA developments.
- If the HCA were to honour its predecessors' broken promises this might radically alter the situation.
- South Warrington is unique in its very limited and irregular bus services, many parts are inaccessible by public transport and the Barleycastle Industrial Estate is totally devoid of any public transport.
- In the foreseeable future South Warrington is a non-viable location for more housing development. At present, it is probably the most challenging area in the town to develop further without massive consequential problems.
- The LDP also suggest the use of an old railway embankment and bridge to the west of Latchford Locks as part of the new strategic transport route. The embankment is too small to accommodate a dual carriageway, which is the only viable long-term solution, without substantial compulsory purchase of land and houses in Latchford to expand it. This route would be detrimental to the people currently living in this area and immensely costly to build the section from Thelwall to the Bridgefoot. It is also routed to disgorge into the worst bottleneck in the town at the Bridgefoot, which is irrational.
- It also closes the direct access to the national Trans Pennine from the eastern section
- Effectively, the LDP innovatively proposes that a ring road be constructed that runs directly through the endemically congested town centre via worst bottleneck in the town.

Section 34 states:

- *Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be*

maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

- The proposed Waterfront development of 4,000 new houses will have immediate access to the proposed Western Link, whereas in South East Warrington over 7,000 new houses in the LDP and the 1,000 in the HCA's plans are left using the existing 19th century road infrastructure with only the vague and highly dubious proposal for the "Strategic Road".
- The existing population of South Warrington are highly car oriented and a very high proportion commute out of the town to Manchester, Liverpool and Chester. The proposed massive new developments will have the same commuting profile as the existing areas. This is totally contrary to the guidance in Section 34.
- If the intention of the LDP is simply to create more commuter dormitories then the beneficial impact of HS2 on Wigan, Liverpool and Runcorn predicated in favour of locating development on the M62 corridor and along the route of the proposed Western Link and towards Moore
- There is no coherent plan for adequate and relevant and varied employment generation and the proposals simply exacerbate and escalate the existing problems.
- The absence of any coherent or viable transport plan, for example Park and Ride or dedicated Bus Ways, is a major defect of the LDP.

Section 39 states:

If setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- *the accessibility of the development;*
- *the type, mix and use of development;*
- *the availability of and opportunities for public transport;*
- *local car ownership levels; and*
- *an overall need to reduce the use of high-emission vehicles.*
- As stated above, the proposed South Warrington developments in Appleton, Grappenhall Heys and the South West Garden Suburb will all attract highly car oriented commuting populations, mostly two or more car families.
- These developments are not accessible and bottlenecks even makes access to the M56 difficult.

- These developments will also have a massive detrimental impact on traffic flows along the already grossly congested A49 and in Stockton Heath and on the limited off-street parking.
- The LDP contains no coherent plan to deal with these impending problems created entirely by the LDP.

Section 40 states:

- *Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure,*
- Parking in the town centre is of less relevance, since the impact of the LDP and the negative impact of endemic congestion and gridlock will increasingly divert customers and traffic away from the town centre.
- Off-street parking in Stockton heath and Lymm is highly constrained and there is little opportunity to create extra parking to deal with the explosion in demand that the LDP will generate.
- There is no recognition of the existing problems, or any strategy to deal with the potential escalating demand.
- A properly researched LDP would have identified these needs and possibly proposed a multi-storey solution for Forge car park in Stockton Heath and, or an investigation of the potential negotiating a joint multi-storey short stay public car park on the Morrisons site.

Section 47 states:

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- The current strategy of requiring developers to provide small numbers of affordable housing on every development is deeply flawed in that developers can make payments to the local authority to discharge this need.
- There is substantial evidence that these payments rarely result in the building of affordable housing by local authorities
- Mixed developments are rarely socially cohesive and tend to result in social tensions.

- The proposed developments south of the Ship Canal will inevitably be high cost and are unlikely to be affordable in the generally accepted sense, whereas high quality over 55 housing would be affordable and would release existing houses throughout the housing chain.
- The LDP should specifically designate areas for larger scale affordable and social housing and for over 55 downsizing.

Section 50 states:

- *Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community*
- There is no evidence of a detailed assessment of population and age related housing needs in the LDP, which at a time of significant demographic change is particularly crass.
- A significant omission is the nationally recognised need for an exit strategy for elderly residents living in under occupied houses and constipating the housing chain. A coherent strategy to develop high quality bungalows for over 55 occupation would have a dramatic impact on releasing under occupied houses at all levels of the housing chain and promoting housing mobility within Warrington. This could potentially provide an increase in affordable housing.
- Recognition of this growing need and the opportunity it represents could significantly reduce the need for new build houses.
- South Warrington, Lymm and the other villages are potentially good locations for this kind of quality development, especially if public transport is improved.

Section 69 states

- *The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see.*
- The congestion and lack of social and community facilities, particularly local pubs in the new town areas significantly impedes social interaction. The LDP lacks any coherent strategy for achieving social interaction, either within the existing new town areas or in the proposed developments.
- WBC has a poor record of listening to the needs and wants of local communities and little inclination to creating a shared vision. Indeed WBC's record over the past 40 years is a contemptuous dismissal of

community concerns and a preference for top down development without infrastructure.

- The LDP is redolent with the defects of poor management and direction and corporate governance enunciated in the Local Government Ombudsman's excoriating criticism of WBC over the illegal destruction of statutory planning records

Section 70 states:

- *To deliver the social, recreational and cultural facilities and services the community needs,*
- This element has been spectacularly absent from the new town development in South Warrington over the last 40 years and the LDP is noticeably vague in this respect for the proposed developments.
- Warrington and Halton hospitals are already operating at or near to capacity. Almost all of the GP / medical centres in Warrington are operating at or near to capacity.
- South Warrington in particular has substantial problems with primary care services. The Stockton Heath Medical centre, which is the largest provider of primary care services has been heavily criticised by the CQC over patient access and has been unable to rectify these deficits.
- The other two GP practices at Dudlows Green and Stretton are in small constrained premises which prevent expansion
- Whilst the LDP makes vague uncosted mention of providing new health facilities in the Garden City Suburb and the South West Extension, there is notably no mention of increasing capacity at Warrington Hospital. The residents occupying the additional 24,000 dwellings will also need access to healthcare facilities.
- Overall the LDP is grossly deficient in coherent plans to resolve the healthcare deficits in primary care, secondary care and mental health services.
- There are no inputs from the Warrington Clinical Commissioning Group, Warrington and Halton Hospitals NHS Trust or Bridgewater NHS Trust, which indicates a cavalier lack of proper research by the Planning Department.

Section 79 states:

- *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by*

keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

- The land designated for the South Eastern Garden City Suburb will substantially obliterate the vast majority of the high quality green belt land between the M6 and the A49.
- The LDP is based on an assumption of 1,113 new homes per annum over the next 20 years, equating to around 24,000 new dwellings. Although the reasoning for this assumption is discussed in the LDP, the conclusion needs to be challenged in light of the current economic environment and future economic risks. Adopting a lower assumption of new homes per annum could have a significantly reduce the amount of Green Belt Land which would be needed.
- The reasons for the level of housing development overall are highly suspect, especially if the irrationally optimistically estimates of the impact of city status are discounted. The LDP also fails to evaluate the damaging impact of existing congestion and the impact of HS2 and other rail changes will have on housing and industrial growth in Warrington
- Building more urban sprawl on some of the last remaining and best green belt land in Warrington degrades the environment within the town for everyone.
- There are other sites within the town of lower environmental quality and which are less problematic from a transport infrastructure viewpoint which should be given much greater consideration..

Section 82 states:

- *Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- There is no clear reason why massive development is needed on the green belt in South Warrington, nor is there any reasoning why there should be such massive development in an area which is highly deficient in infrastructure.
- There are no likely changes in circumstances of any explanation of why Warrington needs another commuter dominated dormitory area to serve industry and commerce in other towns.
- The only reasonable explanation of this development is that it will provide outstanding capital gains and profits for greedy landowners and rapacious developers who make strange bedfellows for a left wing council.

Section 100 states:

- *Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.19 Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change,*
- Flood risk is extensively highlighted in the Planning Guidelines and appears also in Sections 17, 94, 99, 101 and 102, see below.
- The Environment Agency Flood Risk Map shows that large parts of the proposed Waterfront development are a Grade 3 [highest probability] flood risk area from tidal and river flooding.
- Section 100 clearly states that there should be a strategic flood risk assessment for areas at risk of flooding and that the Environment Agency should be consulted.
- There is no mention in the LDP of any flood risk assessment, neither any consultation with the Environment Agent, nor any indication of whether flood risk has been considered and any measures to ameliorate this risk investigated.
- These are gross omissions by the Environment and Regeneration Department and must call into question the competence of the entire LDP and raise the question of exactly who is driving these development proposals.
- Development in a maximum risk flood zone without proper investigation and plans for the necessary flood mitigation measures, which will be extremely costly, demonstrates a flagrant disregard for public safety and people's property. A situation which is similar to disastrous developments on other flood plains.
- The apparent gross and wilful failure to undertake the necessary investigations, or their apparent concealment from public scrutiny, must be considered as a fatal flaw in the Waterfront plan and this development should be deleted pending forensic scrutiny of the location and the omission of the required investigation and consultations

Section 102 states:

- *A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*
- The risks of global warming and rising sea levels are well document nationally and internationally, although it appears WBC is ignorant of these risks. In addition, the Waterfront area is also subject to the Mersey Bore which occurs during a rising tide and is particularly significant at spring and neap tides. Small increases in sea levels will increase the force of this phenomenon, especially during periods of river flood water.
- There must be grave doubts about the safety and sustainability of this development in the short and long term.

Section 109 states:

- *Protecting and enhancing valued landscapes, geological conservation interests and soils.*
- The National Planning Policy Framework indicates that established Green Belt boundaries should only be altered in “exceptional circumstances”. There is no definition of “exceptional circumstances”. WBC indicates they believe that these are exceptional circumstances, but their reasoning is unclear.
- The land designated for the South Eastern and South Western Garden city Suburbs is not ‘spare’ land, it is actively being used for agricultural purposes. In the current context of uncertainty following ‘Brexit’ and broader climate change, using no greenbelt land, or at least a smaller portion of it is highly desirable and should be actively considered.
- The ability to access and enjoy green space is an amenity in itself and the loss of such a significant amount of green space will be detrimental to all residents, not just local ones.

Conclusion

1. This is a totally inadequate plan without the necessary objective investigations and analysis in a number of areas. It relies on projections that do not take account of the current realities of Warrington’s endemic problems, the future impacts of HS2 and other rail developments, Brexit, or the dramatic potential changes in employment over the plan period as a result of growing robotics and other new technologies.
2. Many of the projections are based on the fantasy that achieving city status will bring huge economic development and a total failure to realise that city status is purely ceremonial and does not of itself generate any economic advantage unless the other economic factors are thriving,

which is clearly not the case. City status will bring zero benefit to the citizens of Warrington.

3. A major component of the LDP is projected to take place on land that has the highest level of flood risk and it appears that this has been included without the necessary investigations or consultations, which is grossly irresponsible.
4. The largest number of houses is being placed on the most significant area of green belt within the Mersey Forest belt of South Warrington without any substantive reasons as to why this is necessary or desirable. In addition, this is the most underprovided area of the town for transport, health, leisure and social infrastructure. This area is also the most problematic to in which to resolve the transport infrastructure problems.
5. The planned developments south of the Ship Canal will impact heavily and detrimentally on the existing areas of Stockton Heath to the detriment of the existing population who will gain zero benefit. Significantly the impact on Stockton heath is totally ignored in the LDP.
6. The over-riding impression is that the LDP has been developed and motivated by the commercial interests with the sole objective of their financial gain and a total disregard of the needs or welfare of the citizens of Warrington.
7. There has been a deliberate and utterly disreputable attempt by WBC to impede, obstruct and frustrate the democratic process of public and local parish council investigation and consultation of the LDP. This appears to be a major case of malpractice, injustice and misconduct, which must be taken into account.
8. In conclusion, this is a grossly inadequate, under researched and badly presented plan that appears to have been subjected to political and administrative gerrymandering and as such it is totally unfit for purpose.
9. The LDP should now be withdrawn, reworked properly presented for proper public and forensic scrutiny at a later date.

Yours faithfully

