

Planning Policy & Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH



26th September 2017

Dear Sir/Madam,

Re: Preferred Development Option Regulation 18 Consultation (July 2017)

I would like to make the following comments on the Warrington Borough Council Local Plan Preferred Development Option. I have not completed the on-line response as I felt it did not allow me the opportunity to express relevant issues. I have included some points below, but these by no means reflect the full range of issues at stake through this blunt and poorly thought out planning proposal.

1. Inappropriate use of Green belt land

- 1.1. **There are no exceptional circumstances presented to justify building on green belt land.** Green belt land was previously designated as such to secure it for the enduring future and it should only be built on in **very special circumstances**. This is not the case in Warrington, as **there is plenty of brownfield land available to develop**, together with prospects for much more becoming available over the next 10-20 years (for example, the land currently housing the coal fired power station). In addition, there is a significant amount of **deserted or derelict property** which should be targeted for re-use first.
- 1.2. Despite the PDO document claiming to be based on its conclusions, the plan **contradicts and undermines two of the three framework aims of the “Warrington Means Business”** document through the planned targeting of green belt land in South-East Warrington. The Warrington Means Business document indicates (page 15) that *“the Green Belt Setting”* and the *“link with the Green Belt”* which *“give Warrington a real distinctiveness and an enviable quality of life”*. In addition this document indicates that *“Warrington Means Business seeks to reinforce this green setting to increase Warrington’s image and profile”*. Despite this, the PDO suggests that Green Belt should be built on.

2. Misguided local policy and naïve strategic aims for the region

- 2.1. The provision of the suggested amount of new housing is not the right strategy for Warrington. **There is not sufficient evidence within the plan to indicate why this level of housing was chosen.**

- 2.2. **I do not agree with the WBC councillors' obsession with achieving "Warrington City" status** which appears to be primarily to boost their own ego and personal ambitions, rather than the welfare or living standards of the current population.
- 2.3. Warrington should remain limited in size and sprawl, and **not become part of a massive urban city corridor** (from Liverpool to Manchester) across the North West of England.
- 2.4. Achieving further population and economic growth is not an appropriate course for Warrington particularly based on its location between two successful and attractive existing cities.
- 2.5. **Provision of land for businesses and employment will lead to increased influx of people** and therefore increased demand for housing thereby exacerbating any current shortage of housing that the proposal claims to be addressing.
- 2.6. Resources and planning should instead be targeted to develop and regenerate the current embarrassing and failing town centre.
- 2.7. The town centre is a victim of previous poor planning, and **a woefully poor transport infrastructure** that will always be limited by the network of canals and rivers. Provision of new roads will simply increase congestion nearer to the town centre bottlenecks, and provide increased air and noise pollution elsewhere.
- 2.8. **Any housing/flats would be better placed within walking distance of the town centre** to reduce reliance on transport, promote cafes and pubs, and lead to regeneration within the town centre
- 2.9. **WBC is biased towards the potential financial benefits of any plan**, rather than the best interests of the community, through its business investments and commercial links. These have also not been openly and explicitly declared at an individual or corporate level as part of this development plan document.
- 2.10. The wider network of roads is already unable to cope. **Development around the periphery of Warrington will be attractive to commuters hoping to work in Manchester or Liverpool** and lead to increased demand on the M6, M62 and M56 which are already completely unable to cope with capacity during commuting hours, during peak travelling days, and in the event of any accident or disruption.
- 2.11. WBC have a history of withdrawing services and having insufficient money to complete proposals as stated. I do not believe that any realistic or secure source of income has been proposed (let alone guaranteed) that would facilitate the overarching infrastructure.
- 2.12. The implications of **Brexit** have not been appropriately addressed or anticipated. Based on the uncertainty due to Brexit, HS2, technological advances it is more appropriate for a 10 year plan to be developed rather than trying to anticipate the 20 year plus needs.

3. Local issues relating to Weaste Lane, Cliff Lane and Thelwall Heyes

- 3.1. The fields around Thelwall Heyes provide **a buffer** between isolated strip of housing on Weaste Lane and the village of Grappenhall. To remove this buffer without exceptionally good reason would undermine key principles of planning and also be detrimental to this close-knit community environment.
- 3.2. Thelwall Heyes is a significant grade 2 listed property and building around it would be **inappropriate and out of keeping** with the historical and visual impact of the immediate area.

- 3.3. There is a **significant bat population** living around the canal in the Weaste Lane area. This should be safeguarded and a specialist survey should be conducted to ascertain if development is likely to impact on its wellbeing.
- 3.4. All the farm owned green belt land in South East Warrington appears to be productively used for agriculture or farm animal grazing. This maintains a **pleasant natural rural feel** to this part of Warrington, that attracted me to the area originally.
- 3.5. Bisecting Weaste Lane with a road or any other transport link would arbitrarily **divide the residents**, and disrupt the local community. It would also significantly impact on the attractiveness and convenience of the area for a large number of leisure and sporting users (including cycling, running, walking and use of canals/towpaths).
- 3.6. The identification of potential local transport routes appears to be arbitrary and fails to take account of need or current use. There is no justification within the report for why these routes have been chosen.
- 3.7. Discouraging outdoor physical exercise, together with the possibility of increased air and noise pollution, is likely to **have a negative impact on the health and wellbeing** of local residents and visitors. These would **not** be compensated for through the provision of an artificial and false “country park” in a geographically small parcel of land.
- 3.8. The whole proposal represents a massive change in character for the local communities in Grappenhall, Thelwall and beyond. This would be a **catastrophic move that would lead to irreversible loss of identity for the area**. The remaining South-East Warrington villages are unique in terms of character and resident ‘belonging’ – this has been demonstrated by the huge local outcry and community spirit to fight this clumsy and inappropriate planning proposal.

4. Unfair and Biased Consultation Process

While it may not be a legal requirement to provide consultation (as repeatedly proclaimed by the Planning Chief Executive when discussed at one of the consultation meetings), there is a Common Law **duty of fairness which has not been respected** in this consultation:

- 4.1. The **consultation was not highlighted through advertising, mailshots, or personalised letters**.
- 4.2. The process **was not accessible to all** as it was only initially available via the internet – this particularly biased against many of the elderly (a problem exacerbated since the closure of many local council libraries, including Grappenhall).
- 4.3. The consultation period was deliberately timed to coincide with a **relatively short time period over the summer holidays**; this appears to be an attempt to minimise the opportunity to undertake research and respond in an informed and considered manner.
- 4.4. Public meetings **were not held in key areas affected** (e.g. Grappenhall) thereby limiting opportunities to engage in the process.
- 4.5. The document was **poorly constructed, lengthy, confusing and contained significant jargon** and terminology that was unfamiliar to those not involved with planning.
- 4.6. The consultation has not provided detailed information to those most affected (e.g. in South Warrington).
- 4.7. The recommended response option has been provided **through leading and biased questions** that fail to provide a balanced input across a range of relevant issues.

- 4.8. Public meetings **were too busy, with limited planning staff to talk to** and no useful presentation or open explanation.
- 4.9. Meetings **were not monitored** to gauge usefulness, or demographics of those attending to ensure equality and accessibility to all groups. This implies that they were provided as a 'tick box' exercise.
- 4.10. In person, the Executive Director was dismissive of expressed concerns, and gave the impression that he did not need to justify the document content or the data used to prepare the report.
- 4.11. The maps provided in the documents **were unclear, had unhelpful keys, were inconsistent, and of very poor image resolution**. At the public meetings, they were also inaccessible due to the crowds of attendees, and some maps were even left on the floor as there was no wall space to display them on the walls.
- 4.12. **It is not explicit or clear how the consultation responses will be fairly and reasonably considered**. In order to be fair, those involved in writing the development plan should not be involved in collating and analysing responses.
- 4.13. There is little detail on what report will be produced following the consultation and by whom.

Please could confirm receipt of my letter, and confirm that my comments will be taken into consideration.

Yours faithfully,

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