



28th September 2017

Planning Policy and Programmes
New Town House
Buttermarket Street
Warrington
Cheshire
WA1 2NH

Dear Sir

Warrington Borough Council Local Plan - Preferred Development Option - July 2017

I refer to the Council's Preferred Development Options as a resident of Higher Walton and as an elected Borough Councillor for Appleton, Hatton, Stretton and Higher Walton. During the past few weeks, I have read the documents relating to the Preferred Development Options and attended the members' briefing and several of the public consultation events. I have also attended a number of events organised by residents not only in my own ward but also from other areas in Warrington. I feel that the consequences of this PDO will not only affect residents from South Warrington but also those in the North of the town who will also be impacted by it.

Firstly, I wish to state that I am unhappy at the timing of the consultation over the summer period when many people are away and Parish Councils do not meet. I acknowledge that extensions to the consultation took place but these were only obtained through the intervention of Councillors Bob Barr and Ian Marks.

The quality of the consultation is also an area for concern as the maps provided were difficult to read insofar as they were an overview and did not provide road names and land marks for points of reference. The consultation was opaque for many members of the public as the wealth of documents referred to were confusing to most people. Council Officers have had many, many months to study these and write their own documents in a professional manner whilst the public have not had the same opportunity. Of course, much of this information is only available to those with access to the internet and not all residents

have this facility. I know that when some residents have asked for paper copies, they have only been grudgingly given.

The online consultation response has also proved difficult for some members of the community and I have had several phone calls from residents asking for help to navigate their way through the form. This is simply not good enough as it will have been a disincentive to people to actively engage in the process and register their opinions on a process that will effectively materially change Warrington as we know it.

Once, again the Council have grossly underestimated the numbers of people who wanted to attend the consultation events. I refer, in particular, to the Park Royal event where to my knowledge some people could not get in due to the length of the queue and many people just gave up and went home feeling very aggrieved.

I am ambitious for Warrington and I am not opposed to any housing targets being set in Warrington. I acknowledge that Warrington needs to meet the projected housing needs. However, what I do object to is the size and scale of the proposals as well as the undue emphasis to locate the majority of these new homes in the South of Warrington at the expense of the Green Belt, especially when a Council spokesperson has been quoted in the press as saying 'Interestingly, over the last 38 years the average number of new homes completed per year in Warrington is 920 units.' It would seem, therefore that the Council is not far from fulfilling its housing quota as "The objectively assessed housing needs figure the council had calculated for the new local plan PDO consultation is 955 new homes per annum."

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 permanence.

The Green Belt serves five purposes:

- ☒ To check the unrestricted sprawl of large built-up areas;
- ☒ To prevent neighbouring towns merging into one another
- ☒ To assist in safeguarding the countryside from encroachment
- ☒ To preserve the setting and specialist character of historic towns; and
- ☒ To assist in urban regeneration by encouraging the recycling of derelict and other urban land."

WBC state in the Green Belt assessment that the review will enable them to consider if there are 'exceptional circumstances' (under paragraph 83, NPPF) to justify altering Green Belt boundaries through the Local Plan Process to enable existing Green Belt land to contribute to meeting Warrington's housing needs. If the methodology for determining the housing need is in question then the argument for 'exceptional circumstances' to justify building on Green Belt land is compromised.

The National Planning Guidance Practice says that national planning policy and guidance clearly states that the ' permanence of the Green Belt is of imperative importance as its legacy will last well beyond the planned period.' WBC itself states that the Green Belt boundaries (must remain) fit for purpose and continue to perform well when assessed against the five purposes of the Green Belt. This is completely at odds with the PDO.

I am also dismayed that it appears that no ecology impact or environmental impact reports have been commissioned.

I question the methodology used to reach the housing targets in the plan. It seems that the numbers of new houses required is in a state of constant flux, dependent upon who you speak to or which methodology supersedes which methodology. How can residents have any confidence, therefore, that the PDO is based upon the correct facts. Residents need to know how far the target figure is driven by local ambition and if this is the main driver for the PDO. The projected housing numbers put forward in the PDO appear to be a minimum requirement rather than a maximum. This itself causes further alarm bells.

There is, of course, a need for affordable housing for both young families and the older population to downsize and this I would welcome.

I am extremely proud to be a Warringtonian but fear that the PDO will adversely change Warrington and that overly ambitious targets have been set in what is currently an uncertain future for Britain as a whole. We do not yet know what the reality of Brexit will be and what effect that will have on the economy of the country as a whole but more specifically on Warrington's economy and projected employment forecasts. In this context, it cannot be evidenced as a sound basis on which to base the PDO and completely alter the very nature and character of Warrington which may turn out to be a ghost town of empty houses and flats.

Residents also need to know how the numbers stack up against neighbouring boroughs and what the cumulative effect there will be on Warrington. As we live cheek by jowl with Halton, the apparent erosion of Green Belt land between Walton and Moore will mean that housing developments (another 2000? houses) on Keckwick Lane will have a further negative impact both on the quality of life in the area and on the unique character of both Walton and Moore. There are also a number of significant, historic buildings in Walton which would be adversely affected by the proposals – including the whole of Walton village, Old School, Porch House Farm and Cockfight Cottages which front onto Runcorn Road (listed as historic assets in WBC Core Strategy, February, 2014).

I am pleased to see that the provision of infrastructure features highly in the PDO. The emphasis is purely on the road infrastructure which, I agree, needs significant improvement. However, there is an over-reliance on the road infrastructure and the inclusion of one-third of the houses in the suburbs of South Warrington will increase car dependency. There is little imaginative reference to public transport such as light rail. In fact, the rail infrastructure for Warrington is all north of the river. Why is there no detailed review of this provision and should it not be a priority to develop rail links to Liverpool and Manchester thereby opening up the prospect of reducing a large number of car journeys in Warrington. Warrington is unique insofar as it has the Manchester Ship Canal running through it as well as the River Mersey and the result for residents is daily, lengthy traffic jams at peak times and throughout the day when a ship travels along the Ship Canal. It takes a considerable amount of time for the road network to recover from this. The impact of the new Mersey Crossing tolls for Warrington residents and businesses has not yet been felt. The provision of new infrastructure is essential to alleviate this and should be in place prior to any building taking place. I know that the Western Link is intended to remove traffic from the centre of Warrington but this will only displace it to other areas in Warrington. Far from the further infrastructure supporting the economic growth and prosperity of the town, it is more likely to be a stranglehold on the economy and businesses, large and small, who will start to relocate to more easily accessible towns. I also have major concerns concerning the possible use of the Trans Pennine Trail as this is a highly valued feature in Warrington.

Air quality in Warrington is already a major concern and 5% of deaths in the town are in some way attributable to poor air quality. This is largely brought about by traffic and I question the wisdom of a PDO which encourages greater car use. Is this a desirable consequence of reaching unsustainable, and unproven, housing targets?

I hope that the Council will take the opportunity to now rethink many of the major elements of the PDO and take on board the strongly held and widely researched views of myself and many other Warrington residents.

Your faithfully

