

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

[REDACTED]

29th September 2017

OBJECTION to Preferred Development Option (PDO)

Dear Sirs,

I wish to register my objection to the proposed plans. Please find below the reasons for my objection.

Also please note, for de-duplication purposes, that this document may have sent through multiple channels, i.e. both email and hardcopy through post.

Yours sincerely

[REDACTED]

All references to numbers in brackets are contained at the end of the document

Confusion over “New City” status

- There are multiple references to the terms “Garden City Suburb” and “Warrington New City” in the PDO document.
- Please note that in an interview conducted by the Warrington Guardian ⁽¹⁾ on the 7th Sept Mr Andy Farrall said:
 - *Mr Farrall was also keen to dispel rumours over the authority having firm plans in place to make Warrington bid for city status. "The council has not made any reference to becoming a city," he said.*
- It appears that the PDO (option 2) is only based on the aspiration of WBC executive to create a “new city”. This is not based upon any actual need of the town.
- The benefits that a city status would provide are not made clear.

Assessment of Greenbelt ⁽²⁾:

- There is an obvious conflict of interest in engaging Ove Arup and Partners (Arup) to undertake Greenbelt assessment. It is widely known that Arup are consultants to the building industry “*Arup has shaped many of the defining urban projects of the modern era, leading the thinking on cities.*” source: Arup’s web site.
- No independent assessment of greenbelt has been undertaken
- The National Planning Policy Framework (Paragraph 83) states that established green belt boundaries should only be altered in “exceptional circumstances”. WBC have offered no clear definition of what “exceptional circumstances” are and further still have failed to explain what exceptional circumstances have occurred to require such a huge area of greenbelt land being built on.
- The Document produced was unprofessional and appeared to have been rushed and ill-considered.

Employment and housing needs:

- There is no requirement to produce a plan for such a long period.
 - Technological developments that affect the lifestyles and working practises of inhabitants have not been taken into account.
- The PDO did not take into consideration recent changes to Objectively Assessed Needs (OAN) and is using an overestimate of requirement based on a 2012 survey.
- There is no inclusion of alternative assumptions which might have generated a broader range of outcomes, some with much lower housing requirements.

- There is a short-fall in the UK of affordable housing, but this type of housing only makes up 30% of what is being proposed in the PDO. Construction companies do not profit as much from the building of affordable housing as they do from higher end housing. Green belt land should not be destroyed in order for construction companies to make huge profits.

Impact of PDO on South Warrington:

- Serious and significant loss of Greenbelt land
 - The scale of the proposed development will totally alter the character of the area and engulf the existing Villages of Grappenhall, Appleton Thorn and Stretton
 - The character of the area will be completely altered.
- Traffic
 - The majority of routes into the town centre are already busy due to limited crossing points of the Bridgewater Canal, Manchester Ship Canal and the River Mersey.
 - If 24,000 homes are built with an average then we can expect 28,000 extra cars in the area (national av.1.2 per household, 2011 census).
 - There is real a concern that new links would see traffic from the tolled Mersey crossing bridges coming into Warrington
- Air quality
 - Warrington has the second worst air quality in the Northwest behind Salford.
 - WBC are not promoting or enhancing public transport and cycle route but instead promoting car journeys into the town centre (new market car park demonstrates this)
- Ecology and Environment
 - The loss of a significant area of rural land, will impact species reliant on trees, hedgerows, streams, ponds and fields for their habitat. Owls, bats, badgers, water voles, harvest mice, crested newts are present in these areas.
 - The publics access to these areas will be massively hindered.
- Creation of a new urban centre
 - The PDO appears to want to develop an urban centre to the south of the current town centre in within greenbelt. This is likely have negative effects on the existing town centre . It may also detract from a much needed focus on improvements in the current town centre.

Conduction of the consultation:

- The consultation period started without warning during August 2017 when many people were away or on holiday. This appeared under-hand.
- There is little evidence that any communication plan was considered
- Public consultation sessions have been overcrowded, under-resourced by WBC and conducted mainly outside of the areas to be affected
- Inconsistent messages have caused much alarm and stress for people in the areas affected e.g. the proposed "strategic transport route" along Trans-pennine Trail and railway embankment.
- The documentation provided, was very complex, executive summaries were absent, in general the information provided appeared unintelligible (please see below for examples):
 - WBC have mainly promoted online documentation and made it difficult for people who do not have access to, or skills to use online technology (this has potential for discrimination as it may exclude those with specific physical, mental or learning disabilities)
 - The PDF of preferred development option ⁽³⁾ doesn't have a clickable contents table and this makes it hard to navigate
 - Most of the hyperlinks referring to other documentation do not work and return the user to the local plan review page.
 - Document is unnecessarily complex
 - On submitting feedback via the website, no email confirmation or reference number is given. People therefore have no way of knowing whether their concerns have been received successfully.

My thoughts:

- WBC should work with the people of the town to try and find alternatives to building such high numbers of homes and only use Greenbelt land as a last resort.
- WBC should produce shorter-term plan (say 10 years) and review at this point. As it stands we do not have any indication currently of the effects of:
 - HS2 and HS3
 - Changes in technology
 - Possible decommissioning of Fiddlers Ferry power station
- WBC's focus should be on creating a town centre that provides services that people want, and can access efficiently by public transport.
- Full disclosure from all council members on their interests is required.

References:

1. "20-year vision for town a 'continuation of growth' – no city status bid in pipeline"
http://www.warringtonguardian.co.uk/news/15520755.VOTE_20_year_vision_for_town_a_continuation_of_growth_no_city_status_bid_in_pipeline/
2. Green belt assessment document
https://www.warrington.gov.uk/download/downloads/id/11804/green_belt_assessment_final_report_oct_2016pdf.pdf
3. https://www.warrington.gov.uk/download/downloads/id/13435/preferred_development_option_final_july_2017_lr.pdf