

[REDACTED]  
Warrington  
[REDACTED]

12th June 2019

Local Plan,  
Planning Policy and Programs,  
Warrington Borough Council,  
New Town House, Buttermarket Street,  
Warrington,  
WA1 2NH

Representations on the Warrington Proposed Submission Version Local Plan 2017 – 2037 and the Local Transport Plan LTP4

Dear Sir/ Madam

I write to make my representations on the above mentioned plans. These comments are in addition to the comments I made along with many other people on the previous plan the Preferred Development Option (PDO) in the summer of 2017. Although over 4500 comments were received on the previous PDO it seems nothing has really changed in the revised plans now being presented. Although it is a Government requirement to produce such plans WBC seem to ignore the requirement for a 15 year plan and have instead chosen to develop a plan for 20 years. This is after carrying out a similar exercise to produce the 2014 plan which has now been consigned to history.

I do not profess to be knowledgeable on the planning process but having looked at the Proposed Submission Version Local Plan (PSVLP) and some of the supporting documents it is clear to me there are always vested interest at play in these situations. It is striking how little or indeed no input there has been from the people that really matter namely the citizens of Warrington who have to live with the consequences of the WBC actions for years to come. The plans and supporting documents make numerous references to meetings, consultations and workshops with various stakeholders mainly developers, land owners and consultants all of whom have one thing in common along with the WBC to get the plans approved and start building.

Once built new developments, roads etc can't be unbuilt they are there for ever so the decisions made by WBC and its army of consultants are fundamental to the wellbeing and health of its current and future citizens. It is with that in mind that I find the proposed PSVLP and supporting documents to be UNSOUND and UNDELIVERABLE. The reasons why I have reached these conclusions are outlined

below but before I list them, I must take issue with the WBC regarding the fundamentals of how they seem to be driven by a desire to grow the town into some kind of Regional City Status which is clearly a vanity project for the council. Again, I stress to my knowledge this stance for City Status has no backing from the citizens of Warrington. My town, Warrington was once the jewel in the crown of the North West towns and when the Government of the day gave it New Town status in the late 1960's and a budget to deliver it. The potential was there to become a truly great town. Unfortunately, it was a missed opportunity and never carried out to its full potential. Just as now there was a relentless drive to construct new garden suburbs Birchwood, Locking Stumps, Dudlows Green to name just a few. The houses were built along with a couple of major amenities centers but the major infrastructure for transport that was the key element of the delivery strategy were never built. This was probably due to cost cutting and as a result the town has suffered for it ever since.

No amount of Consultants Reports can undo this lack of delivery from the New Town Development that was undertaken in 1970's and 80's. The road systems just aren't there, and they can't be conjured up out of thin air. To build the right infrastructure now would mean the demolition a large area of the town which is just not feasible. The town is constrained by the existing main road systems and the choke points that date back to Victorian times and beyond. Nowhere is this more obvious than in South Warrington where like it or not we are stuck with the North/South routes of the A49 and A50 both of which cross the Bridgewater Canal and then the Manchester Ship Canal the later via Victorian swing bridges. The East /West route is via either the A56 with again a Victorian swing bridge to negotiate or the M56. Other than the Centre of Stockton Heath which has developed around the Junction of the A49 and A56 and is urban but with a village feel the rest of the area bounded by the roads mentioned above is a collection of hamlets predominantly with a mixture of housing and green belt.

The PSVLP sets out a vision too urbanize the area bounded by the A49, A50, A56 and M56 if approved it will destroy the character of Stockton Heath, Walton, Stretton, Grappenhall, Appleton Thorn and a number of the surrounding neighboring districts.

My objections and comments on the PSVLP and supporting documents are as follows

1. No evidence or justification that the number of houses proposed are actually required therefore the plan is not sound
2. No evidence or justification that the amount of land proposed for industrial or commercial use is actually required therefore the plan is unsound
3. The use of existing brownfield land has not been fully explored. Today Thursday 13 June 2019 SSE has confirmed that Fiddlers Ferry Power station will close in 2020. This will release a substantial amount of brown field land that cannot be ignored in the overall plan. Therefore, the plan is unsound
4. The release of Green Belt land confirmed as Green belt in the 2014 plan is not justified it goes totally against one of the main fundamentals of the Green Belt namely the prevention of Urban Sprawl any release of Green Belt should be a

- last resort not a preferred option because its easier to build on than Brownfield sites therefore the plan is unsound
5. The Green Belt has a major role to play in protecting our natural environment. Any loss will have an impact on wildlife habitat and ecology of the surrounding areas therefore the plan is unsound.
  6. Warrington is rated as one of the worst 5 towns in the UK for air quality any reduction in green belt will only exacerbated this situation with the loss of carbon soak therefore the plan is unsound
  7. Clearly the addition of a potential 7400 houses in the South Warrington Garden Suburb alone will make the air quality situation far worse therefore the plan is unsound
  8. Depending which part of the PSVLP or supporting documents you read there may be anything up to 28000 new home built over the next 20 years. That is a rate greater than the era of the New Town Development during the 1970's and 80's and is way above government forecast. From the PSVLP figures 28000 homes equates to 64400 people this is 31% increase over the 2017 Warrington population of 207000. Yet the UK Government figures (Office for National Statistics ONS) states the expected growth in the UK population by 2041 (24 years hence) will be 7.4M above the current 65.9M that is a national increase of 11% over 24 years. The PSVLP is stating the potential growth almost 3 times more than the UK Government ONS estimate and the ONS estimate is for 24 years not 20 therefore the plan is unsound
  9. The proposed employment development area focused around the Lymm Interchange namely Six56 will have a massive impact on traffic movements around an already congested area. The interchange at Lymm between the M6 and M56 including the Thelwall Viaduct is one of the busiest in the country. The amount of HGV and car movements form the development would be unsustainable and therefore the plan is unsound
  10. In the PSVLP its states
    - a. *The Borough has a unique identity with the town of Warrington surrounded by attractive countryside and a number of smaller outlying settlements, each with their own separate character. The Borough has a large number of heritage and ecological assets which contribute to Warrington's identity and character.*
  11. It is this very Character the proposed plan seeks to destroy by significant over development in the Green Belt areas of the town therefore the plan is unsound
  12. A recent BBC survey has shown Warrington is currently one of the highest rated towns in the UK for over development with a built environment of 28% compared with the UK average of just 6%. The combined Green Urban and `natural environment is 15% for Warrington compared to 35% average for the UK therefore the plan is unsound.
  13. The WBC has employed at significant cost a number of high powered consultancies to help it fulfill its obligations in developing its various plans and

support documents. it is clear that any consultant employed to develop such a plan and justification for what their employer i.e. WBC is briefing them it wants to achieve. Is unlikely to find in effect against the wishes of the employer. The plans and support documents are by necessity going to be written with a bias in the way the WBC and various stake holders want them to reflect. They are unlikely to say the proposed plans are not justified. Therefore, the plans and reports are not impartial therefore the plan is unsound

14. WBC has a poor track record of controlling the delivery of developers. Despite trying over the last 5 years to get Peel Holdings to refurbish and paint the decaying Victorian swing bridges on the A49, A50 and A56 crossing points which are key to the PSVLP they have failed. Yet Pell Holdings are one of the key developer partners for WBC therefore I believe the plan will be undeliverable.
15. Another key part of the PSVLP infrastructure is the provision of new medical facilities and schools. Although the developer may be persuaded to build the buildings recent national reports on doctor and teacher retention and availability cast doubts as to if such facilities could be staffed. The existing facilities particularly in South Warrington are already at capacity therefore I believe the plan is undeliverable.
16. As the WBC is not likely to fund any of the proposed housing development it is assumed all funding will be from developers. These same developers will be expected to build the various community assets and infrastructure required in the plan. The WBC has a very poor track record on getting developers to fulfill their obligations in this regard. How will the WBC ensure that any such commitments are met? It is highly likely they will fail, and we will be back to the same issues of the previous New Town Development era and lack of delivery. Therefore, I believe the plan will be undeliverable.
17. The fact that such a large proportion of the proposed development is located in the South of Warrington and on Green Belt land it is difficult not to come to the conclusion that the WBC sees an opportunity to maximize the potential Council Tax revenue by having the maximum number of properties in potentially High Rate Band areas common in South Warrington. It is also highly likely that any potential developers will buy their way out of providing "affordable housing" by using "viability assessments" after planning permission has been granted to avoid the need to comply with, the affordable homes requirement. This also suits the WBC as again it will ensure maximizing the Council Tax Revenue therefore the plan is unsound
18. There is a budget schedule as one of the supporting documents associated with the PSVLP and it lists approx. £2billion of funding required for infrastructure projects of which approx. £272Million is secured approximately half of this figure is for the Western Link road. This leaves a £1.7Billion funding gap that in the current and medium term is highly unlikely to be met by national government. Bearing in mind the WBC has over the last few years taken on approx. £1Billion of debt to finance the acquisition of various property sites and

other assets. The only conclusion you can reach from this is it is unlikely a further £1.7Billion of funding can be raised and therefore I believe the plan will be undeliverable.

19. There are a number of vague aspirations in the LTP4 transport plan the WBC will pursue to alleviate the chronic traffic problems across the town. The most ambitious of these aspirations is a Rapid Transport System which is not even in the £2Billion of infrastructure funding. So again, the only conclusion one can draw is that both in timescale and funding the plan will be undeliverable.

20. Turning to the Town Centre I applaud the WBC for pushing ahead with Time Square development albeit it has demolished a large part of the Town Centre constructed during the New Town Development era giving it a life span of less than 50 years. I hope and pray the new Time Square development will not prove to be a white elephant and will last longer than 50 years. The problem is the rest of the town center is decaying before our eyes. Significant building (the Cabinet Works for one) have been lost due either to the WBC not fulfilling their obligations in this regard or by being distracted by the efforts in developing the various plans I am commenting on. Or worse they don't care about the town center and its heritage. Either way there is a major opportunity to focus on the regeneration of the Town Centre, but it requires a radical approach similar to that undertaken in Altringham and now being pursued by Stockport and others. Rather than pulling down or worse letting it fall down we should be regenerating what we have. Therefore, without a radical rethink I believe the plan is unsound.

The planners, consultants and transport engineers need to look again at the whole of the town's infrastructure. As a result of the copious number of reports and studies that have been undertaken there should be enough real data to take a fresh look at what is really needed to realistically plan for the next say 10 years and deliver a plan fit for purpose, sound, deliverable and affordable and not take us unwillingly down a path to some mythical "City Status" that nobody other than the WBC wants. Let's fix what we have and move to a sustainable plan that protects what is the towns outstanding features and don't concrete over its greatest assets. The world is changing fast and over the last twelve months there has been a sea change in peoples and governments perceptions for the future construction methods and sustainable energy requirements that will be unstoppable in future planning. It is clear the current thinking is already out of date. Government announcements over the past few weeks on energy efficiency targets and the environment alone means WBC needs to think again. No more same old stale thinking we need a plan that fits the massive shift in sustainability and proper use of land and resources for the wellbeing of the natural environment and its citizens. If this action is pursued then maybe, we could end up with a plan that would be sound and deliverable, and we could all support.

Yours Faithfully

Leslie Ireland [REDACTED]

Tel [REDACTED]

Mob [REDACTED]