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16th June 2019

Dear Sir,

Objection to the Draft Local Plan presented by WBC

I am a local resident who will be significantly impacted by the proposed development.

Warrington and its residents deserve a plan that is based on sound economic assumptions and actions, that builds on brown field land, provides great infrastructure links within and outside the town, and with a strategic view on environmental and health impacts. This is not that plan.

This plan is not sound and should be rejected.

Section 1.1.8 says:

Legislation requires that plans are “sound” and one of the four tests of soundness set out in the NPPF is that plans are consistent with national policy. The other tests of soundness are that the Plan is:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; and
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters.

It is clear that the updated plan does not meet any of these tests.

It is not positively prepared:

- the needs of the area have not been objectively assessed. The economic development plan is weak, lacks vision and does not require the housing outlined in this plan. Basing a developing economy on warehousing and transport is a fundamental problem for the health of a town and a poor economic decision in a world of automation.
- It is clear from the map of development and green belt conversion that decisions made in the plan are politically motivated. The Council and DMC are dominated by one party, most of whose seats are based in areas not affected by the developments. For me, this is one of the saddest points of the plan as it combines a planning department’s cynicism (“Let’s go for an easy approval”) with a DMC’s lack of representation (“Let’s put it somewhere that does not affect our votes”).
- The economy is in flux and any predictions need to take into account the impact of automation, Brexit, other regional developments, and government investment decisions. The strategic assumptions made in this plan disagree with government guidance and take a massively optimistic view of Warrington’s future.

It is not justified:

- Warrington is a town split by two canals and a river and bounded by motorways. This means it is key to have the right major infrastructure links, crossing the water, and providing access to locations outside the motorway restrictions. The plan provides no view on either of these matters, other than the Western Link. For the Garden Suburb development there is a link planned within the area, but this will provide no connections outside the area.
- There are no new ways to provide connections to the rest of the Northern Powerhouse – no trains, trams, roads or other sort of connection. The infrastructure plan does not address the needs of the town as a whole – merely proposes a way to move cars round the developments. This is a circular argument: if we have cars we need roads, if we have roads then we can have cars. But the plans are quite literally describing a “road to nowhere”

It is not effective:

- The lack of engagement with local bodies, the ignoring of established neighbourhood plans and the lack of partnership with other local authorities means that this plan will be difficult to implement and will likely become a white elephant – houses without jobs, infrastructure, or positive economic impact for the area.

There are other reasons the plan is not valid:

Lack of response to consultation.

Sections 1.2.5 and 1.2.6 say

Around 4,500 responses were received to the PDO consultation. These have all been taken into account in the preparation of this Proposed Submission Version Local Plan. 1.2.6 The vast majority of representations were made by Warrington residents concerned with the scale and location of development being proposed, in particular relating to the release of Green Belt. The Council also received a large number of representations from developers and landowners actively promoting sites through the Local Plan process.

Are we really meant to believe that 4,500 responses objecting to the scale and location are balanced by “a large number of representations”? The council must address the concerns raised but they have not. There are very few differences between the PDO and this draft.

Lack of recognition of pollution impact on health

Section 2.1.50 says

There are a number of major sources of pollution contributing to pockets of poor air quality at a local level namely; transport, industrial and domestic heating. In addition to local sources, there are transboundary effects from regional, national and international sources that are outside the control of the local authority. The major source of pollution at a local level though has been assessed as related to transport, primarily road.

There is no part of the plan that addresses this. According to the WHO, Warrington has the worst score for small particulates (PM2.5) in the UK. The health of the entire town will be affected by a transport-based economy, or on building developments that require so much car usage. This is short-sighted and potentially life-threatening approach for this and future generations – for the whole borough.

Inconsistent and low-quality economic plan

In point 3 of the vision statement it is claimed that “By 2037.... Warrington will consolidate its position as one of the most important economic hubs in the UK and will see the development of major new employment locations. Its highly skilled workforce will support a wide range of economic activities, including engineering, hi-tech manufacturing, business services, logistics and research and development.”

The nature of the proposed developments in no way line up with this statement. There are no plans for the “highly skilled workforce” or “ hi-tech manufacturing”. The town’s economic plan does not show how this will happen and this Draft Plan emphasises a rush to logistics as the low-value, high negative impact, industry of choice.

Taking Green Belt without good reason

It is also claimed in the 2037 vision that “The character of Warrington’s places will be maintained and enhanced with a vibrant Town Centre and main urban area, surrounded by attractive countryside and distinct settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed.”

But the plan spends most of its time explaining why they want to build on the Green Belt. The arguments are based on where they want to buy land, not on why the green belt is the best place to build. The Green Belt is seen as an obstruction in this plan and its role as an asset for the borough is significantly under-valued.

Section 3.3.15 says

“The revised Green Belt boundaries will ensure the long term integrity of the Green Belt. The additional development capacity provided within the Garden Suburb, together with anticipated future capacity within the Town Centre and wider existing urban area, will ensure the Green Belt boundaries will endure well beyond the end of the Plan period.”

This is one of the most specious arguments in the whole document: it is saying we are taking Green Belt so that people do not take Green Belt in the future. The best way to protect Green Belt in the future is to not take it now.

Infrastructure links do not offer access to the town or beyond.

Section 3.3.10 says

“The Garden Suburb will deliver a wide range of infrastructure and services to support the new development in the south Warrington area. Internal roads will be designed to include segregated pedestrian and cycle paths and provide high levels of priority for public transport services. New greenways will also be created which will connect to all parts of the new Garden Suburb. Residents will have improved access to the Town Centre and ease of access to employment areas across Warrington.”

The Garden Suburb Strategic Link merely cuts across the current development, providing a quick access for heavy traffic from one motorway junction to another.

I find this to be one of the best examples of a misleading proposal in this document. It is presented as a new infrastructure link but in fact it does nothing to enable the prosperity of the town or enable connections for the Garden Suburb into Warrington town centre. This is poor judgement at best and mis-leading at worst.

I am making a strategic point: why would you invest a disproportionate amount of development in an area that has car-focussed transport links to the Town Centre and its train stations? These links are poor enough already – why make it worse? We would be building a walled community, with internal but no external links. The newly-developing town centre would not grow at the rates we want it to if we cannot get people into it.

21st century cities are public transport-focussed; Manchester is shutting roads not building them. The plan makes no provision for an expansion of a tram or rail-based transport system. It is not a plan that supports a city vision.

The plan also makes no meaningful or funded reference to a crossing of the key waterways. The plan cannot work without this crossing. I suspect an appropriately-sized crossing would add significantly to the cost of the development.

And to add weight to a separate point: even the route of the Garden Suburb link is contemptuous of local residents. It goes past existing developments and is not planned as part of the new layout. How can the council say they have listened to residents? They have made no change to the proposed route and repeatedly tell people at consultation events that “it is just pencilled in” – but will quickly become inked-in if the plan is approved.

The world has changed since the plan came into being

The prospect of a no-deal Brexit will impact all of the UK’s economy. We should not be planning without knowing what our relationship with Europe will be.

Section 3.4.2 says “In accordance with paragraph 137 of the NPPF the Council has examined fully all other reasonable options for meeting Warrington’s identified need for development before concluding that exceptional circumstances exist to justify Green Belt release.”

Since the plan was written, the closure of Fiddler’s Ferry power station has been announced. This is a fantastic site, with rail access and on the north, more accessible side, of the canals. It would be reckless of the council to not consider this brown field site.

In summary

In closing, I do wonder to myself why I have taken the time to write this objection. It is clear that rather than working on amending the PDO based on the 4,500 residents comment, the council has spent its time building an evidence base in preparation for review by a planning inspector. If the council had taken the time to actually make any meaningful change to the plan then maybe they could say they have listened to residents but it is very clear that they have not. They have not changed the plan in any meaningful way. Their behaviour is contemptuous of the views and lives of the communities for whom they are meant to be working. If the council does not listen this time, then it is a further insult to their constituents.

Yours faithfully,

Mike Palmer