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Response to Public Consultation

Warrington Preferred Option – Local Development Plan

I wish to register my objection to the whole of the Preferred Development Option of the Warrington Local Development Plan.

I believe the whole of the proposed option to be fundamentally flawed and that it should be abandoned in its entirety and be replaced by a plan that is Community rather than developer led and truly reflects the housing /employment needs of the people of Warrington. The proposed option does not constitute ‘sustainable development’, it promotes unrestricted urban sprawl. The proposed new roads will not ease congestion / pollution but increase the problem with dire health consequences for the resident population. The proposals are ill thought through, based on flimsy evidence, and unreliable calculations. There is overall, an unrealistic view of Warrington’s achievements and illogical future forecasts.

Regulation 18 Consultation

I believe the consultation process for Warrington’s Local Draft Plan to be fundamentally flawed for a number of reasons:

The preparation of a Local Draft Plan, especially one which is for a period of 20 years, is of such significant importance to the lives of people living in Warrington that all effort should have been made to allow people the opportunity to fully and fairly participate in the full process.

The first step in the consultation procedure should surely have been to make people aware that a consultation was being carried out. A posted letter to every household should have been sent at the very beginning of the consultation process in Oct 2016

There has been such confusion with regard to the consultation procedure, with even borough councilors, not being able to supply details on who and when, have and will be taking key decisions.

I recently sent an email request to the Planning Policy team for information on the procedure and how key decisions are made.

This is the reply I received;



“The Council’s Executive Board took the decision to commence the review the Local Plan and approved the Preferred Development Option for consultation.

I have provided links to the Executive Board reports below.

On 10th October 2016 Executive Board agreed to commence a review of the existing Local Plan and proceed to consult on the scope of the Local Plan review in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. [Link to 10th October 2016 Report](#)

On 10th July 2017 Executive Board agreed to consult on the Preferred Development Option for the Local Plan Review, again under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. [Link to 10th July 2017 Report](#)

The next stage is for the draft version of the Local Plan to be prepared, taking into account the responses received from the current consultation. The draft Plan will then be subject to a further period of statutory consultation prior to being submitted to the Planning Inspectorate for independent Examination. The earliest this next stage of consultation will take place is spring 2018

At the draft Plan stage, approval is required by Executive Board and Full Council prior to submission for Examination.”

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The consultation Process. The consultation period had started last year. After the Executive Board meeting of 10th October 2016 Parish Councils were informed of the start date of the consultation (this I found was recorded in the minutes of the meeting of Grappenhall & Thellwall Parish Council). It is recorded in WBC Local Draft Plan Consultation Documents that there were just 78 replies to this initial consultation, mostly from landowners /developers re the ‘call for sites’ which was done at the same time.

On July 10th 2017 WBC’s Executive Board, agreed to consult on a ‘preferred option’ – recommended by the planning policy team and Regeneration Officer Mr Andrew Farrell. Thus, began the ‘Public Consultation’. This was set over the school holiday period – after mass public protest, this was extended to a further 2 weeks.

Shortly, WBC’s Executive board will decide on if and how the Draft Plan will be progressed. Prior to submission for Examination the approval of both the Executive Board and Full Council will be required. At the public Examination the inspector will only take objections on policy, legalities and soundness.

Where is the people’s voice in this process? Any submissions made during the ‘public consultation period’ will have their merits judged by a board of ten people who initially agreed the ‘preferred option’! Surely a Full Council vote should have been scheduled far earlier on in the process?

The public have not been given enough time. To expect members of the public to be able to scrutinise such a vast amount of complex material in so short a time is unrealistic. The organised events were not helpful as even the advisors had no clear idea of the proposals and couldn't answer questions posed. Replies I got were "nothing's definite, it could all change"& "I don't know". The maps were unclear, and it was difficult if not impossible to work out exactly where new roads would run. The events were packed, there were long queues, no seats for the disabled or elderly waiting to go inside.

Overall, for the general public, the consultation process was fundamentally flawed.

With regards to the right to participate in the planning process I refer you to:

The Cabinet office Code of Practice on Consultation, which stated:

"If a consultation exercise is to take place over a period when consultees are less able to respond, e.g. over summer or Christmas break, or if the policy under consideration is particularly complex, consideration should be given to the feasibility of allowing a longer period for the consultation."

Also, Art 6 of Directive 85/337

and The Aarhus Convention

Housing Targets

The massive growth /housing targets are unrealistic and unnecessary, they do not represent the true needs of the people of Warrington in either, type, size or cost.

These high figures appear to have been generated merely to suit the ambitions /aspirations of a few of Warrington's Councillors and council officers. Their aspirations to become a 'new city' is not shared by the people of Warrington. A petition in 2015 to bid for Warrington to be awarded 'city status' got only 3 signatures!

There is no need to set housing targets for 20 years. A 5 year supply with further 5 year deliverable reserve is adequate and in the present uncertain economic circumstances would be more realistic.

There does not seem to have been detailed discussion with neighbouring authorities (Duty to cooperate)

There are already 2 'garden city suburbs' to be created in nearby areas. Halsneath and Handford, how much growth and resultant traffic can a region cope effectively with?

The 'Garden City Suburb' project proposed, offers no benefit to the people of Warrington, it would just result in yet another 'commuter estate', for wealthy buyers from outside of the town. The supposed 'affordable' housing which may be included would not be truly affordable to the majority of Warrington residents. There would

be no benefits from progressing this unnecessary development – other than for landowners / developers. The people of Warrington would lose green belt which acts as ‘green lungs’ in combating the effects of Warrington’s re-known high pollution levels. The villages of Appleton Thorn, Grappenhall, Thellwall & Stretton – at present distinct in character will become just urban sprawl. The green fields and woodlands, so treasured as our historical/cultural identity and very valuable natural habitat will be lost and this will have very negative effects on quality of life. There are no ‘very exceptional circumstances’ to justify the loss of this greenbelt’

The employment opportunities offered as part of the city suburb is proposed to be a huge warehouse estate, and a couple of shops. The jobs created will certainly not pay enough for workers to live in the homes built – this completely defies the object. The principles of garden cities are far from what is proposed here. The addition of a new road which would help to unlock further housing employment sites has been cited as an ‘exceptional circumstance’ for loss of green belt – this is contrary to recent case history.

Air pollution

Warrington is already highly polluted. The WHO has rated Warrington as 2nd highest in the North West.

There has been no substantial Environmental Assessments done, without these to consider how can anyone make an informed decision.

ENVIRONMENTAL Assessments

And Directive 2011/92/EU of the European Parliament and of the Council of 13th Dec 2011 on the assessment of the effects of certain public and private projects on the environment.

This letter by no means forms the whole of what I would like to comment on, the poor consultation and lack of time have made it impossible for me to respond to the degree that I feel should be my right.

I sincerely hope that the Executive Board will take account of the mass opposition to this proposed option and let us move forward to make new community led plans of we can all be proud.

Yours sincerely 