



Planning Policy and Programs,
Warrington Borough Council,

Representations on the **Warrington Updated Proposed Submission Version Local Plan (UPSVLP) 2021 – 2038** dated September 2021

Dear Sir/ Madam

I write to make my representations on the above mentioned plan. 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 although there are significant changes in the UPSVLP. The fundamental infrastructure issues have again been ignored.

I do not profess to be knowledgeable on the planning process but having looked at the Updated Proposed Submission Version Local Plan (UPSVLP) 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 must 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, landowners 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 UPSVLP 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 Northwest 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 via decaying 19th Century Victorian swing bridges that open on a regular basis. There is a fixed Cantilever Bridge (weight restricted) to be used as an alternative, but this is woefully inadequate for the volume of traffic at peak times.

The only alternative to these two A road routes is Lumbrook Road and Red Lane both via single track 18th Century bridges crossing the Bridgewater Canal the former an underpass traffic light controlled and a notorious bottleneck. The second via a Humpback Bridge just wide enough for a single domestic car and nothing else. These two bridges were designed for horse and cart but are now being asked to cope with 21st Century traffic. The proposed building of the East Warrington Urban Extension (EWUE) formally called the Garden Suburb in South Warrington (albeit with slightly less houses than the 2017 PSVLP). Will have a devastating effect on the traffic volumes particularly at peak times. For these total inadequate and outdated road infrastructures The UPSVLP 2021 is **NOT SOUND**

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 UPSVLP sets out a vision too urbanize the area bounded by the A49, A50, A56 and M56 via the EWUE. If approved it will destroy the character of Stockton Heath, Walton, Stretton, Grappenhall, Appleton Thorn and several the surrounding neighboring districts.

This proposed urbanization is totally contrary to the requirements of **NPPF Section 13 Para 149 Protecting the Green Belt** which states: -

149. *A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:*

(a) buildings for agriculture and forestry;

(b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

(c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

(d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

(e) limited infilling in villages;

(f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

(g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or*
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

The UPSVLP does not comply with Par 149 and therefore the plan is **NOT SOUND**

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

1. In the UPSVLP it 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.*

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 **NOT SOUND**

2. No evidence or justification that the number of houses proposed on Green Belt land are actually required therefore the plan is **NOT SOUND**
3. No evidence or justification that the amount of land proposed for industrial or commercial use is actually required therefore the plan is **NOT SOUND**
4. The use of existing brownfield land has not been fully explored. No account of current building of housing and flats seems to have been considered therefore the plan is **NOT SOUND**
5. 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 it's easier to build on than Brownfield sites therefore the plan is **NOT SOUND**
6. 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 **NOT SOUND**
7. 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 **NOT SOUND**
8. Clearly the addition of a potential 3600 houses in the EWUE alone will make the current poor air quality situation far worse therefore the plan is **NOT SOUND**
9. Depending which part of the UPSVLP or supporting documents you read there may be anything up to 23000 new homes 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 UPSVLP figures 23000 homes equates to 52900 people this is 26% 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 (20 years hence) will be 7.4M above the current 65.9M that is a national increase of 11% over 20 years. The UPSVLP is stating the potential growth almost 2.4 times more than the UK Government ONS estimate therefore the plan is **NOT SOUND**

10. The proposed employment development area focused around the Lymm Interchange namely Six56 will have a massive impact on traffic movements around an already very congested area. The interchange at Lymm between the M6 and M56 including the Thelwall Viaduct is one of the busiest in the UK. The amount of HGV and car movements from the development would be unsustainable and therefore the plan is **NOT SOUND**
11. 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 **NOT SOUND**
12. 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 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 **NOT SOUND**
13. WBC has a poor track record of controlling the delivery of developers. Despite trying over the last 7 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 UPSVLP they have failed. Yet Pell Holdings are one of the key developer partners for WBC therefore I believe the plan will be **UNDELIVERABLE**.
14. Another key part of the UPSVLP 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 adequately staffed. The existing facilities particularly in South Warrington are already at capacity therefore I believe the plan is **UNDELIVERABLE**.
15. 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**.
16. 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 **NOT SOUND**

17. In The previous development plan, there was a budget schedule as one of the supporting documents associated with the PSVLP and it listed approx. £2billion of funding (this may have been superseded now but the broad figures will be similar) required for infrastructure projects of which approx. £272Million was 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. £2Billion 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**.

18. There are several 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**.

19. 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 buildings (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 like 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 in this regard I believe the plan is **NOT SOUND**

We now live in a new world as a result of the COVID Pandemic. Attitudes to our work life balance and working habits have changed beyond recognition and permanently changed what needs to be planned for. Unfortunately, the 2021 UPSVLP is already out of date and the outcome of COP26 will not only impact the planning requirements going forward but is likely to demand a complete rethink on not only what we build but how we build it.

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. The planners will have to now think how they are going to achieve **NETT ZERO by 2050** 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]

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