

Dear Sirs,

I write in relation to the Local Plan Consultation and provide the following representation and feedback.

Firstly, I want to be clear that I spoke with Cllr Ross Bowden as part of the emerging consultation in 2019 and requested an extension of time to this based on the complete lack of consultation within the South of Warrington. As an illustration, Warrington Borough Council (WBC) were previously advertising on St Helens Radio, as an output of my threat of Judicial review the consultation timeline was extended.

Within the revised consultation I find it quite frankly appalling that the local authority has only held consultation events at one central location for a population of circa 210,000. I attended a more local event that was arranged by the local parish council to try and provide visibility – again, I found it appalling that there was no local authority/ LPA presence at these sessions. This is clearly not appropriate consultation and does not cater for equality and diversity or clear and meaningful local level community consultation. In addition, I think the level of consultation goes against planning policy and could be perceived as the LA doing the bare minimum to push the plan for self gain i.e. increased council tax income for high banded resi housing in the south of say £12m per annum based on 4,200 homes. Not to mention the business rates income from the Six 56 development.

Moreover, I have noted that the automated consultation system does not provide people with autonomy of offering a response and leads the local population to providing the local authority with leading question responses with a clear agenda of growth to city status. The people of Warrington do not want or aspire for city status and have made this clear previously (put it to a vote); On this basis, may I remind you that WBC has democratically elected individuals that represent the people and everything that you do goes against this, including listening to the previous feedback and making change that reflects the wishes of the people.

I moved to [REDACTED] and the suggested Road infrastructure on the “blue line” that was put into the plan. Clearly, the revised and new South East Warrington Urban Extension will have a significant impact on the surrounding areas I have moved to and this will be the focus on my response with some broader themes. As part of my response, I have read and will reference to the following document;

[https://www.warrington.gov.uk/sites/default/files/2021-09/south\\_east\\_warrington\\_urban\\_extension\\_-\\_a\\_deliverable\\_proposition\\_-\\_august\\_2021\\_1.pdf](https://www.warrington.gov.uk/sites/default/files/2021-09/south_east_warrington_urban_extension_-_a_deliverable_proposition_-_august_2021_1.pdf)

Fundamentally, I find it very inappropriate that the front cover of this document refers to working in partnership with a commercial entity Miller Homes. I find this very unfitting given Miller Homes are a commercial property developer that have clear bias and wider interests in being allowed to develop. Moreover, these documents are meant to be driven by the Local Planning Authority which are meant to be independent. I am sure you appreciate that from this I start to question motives of the LA.

I have noted that this is a new proposition, there is an allocation of 4,200 homes over the next 20 years, this feels very significant. I have noted that there are currently 370 houses (Application Number:2017/29930) being built on dipping Brooke Avenue, Warrington and a

significant number of houses have being built by Bloor Homes at land off Pepper Street and the B5356. In addition, there are also significant developments underway at Grappenhall Hays and wider developments being approved, are these include within the 4,200 allocation and if not, why not?

In addition, I would like to raise a key point point about the new development (Application Number:2017/29930) off Dipping Brook Avenue and draw your attention to the proposed new Road that cuts through the new housing estate (ringed below) - and through greenbelt land. The key areas of concern to me are the key dates and alignment to the draft local plan consultation of 2019. Fundamentally the planning application was submitted on 2<sup>nd</sup> March 2017 and decision made on 18<sup>th</sup> January 2018. This development was approved. Given these key dates and the design of the development with a clear gap in the land put in place to support a new road; I am very much struggling to understand how and why this new road was not put into the draft local plan of 2019 and put it to you that that WBC/ Homes England and commercial partners new about this new revision and inclusion of the South East Warrington Extension at 2019. Given this, it should have incorporated the new road into the draft plan and put of to you that the South East Extention has been in development for some time and pre the 2019 consultation. Given this, please accept this as a **Freedom of Information** request, I would like copies of all communication in relation to this proposed new road identified on the plan below including communications between all WBC officials and partners please do not hide behind the detail being commercial sensitive as it is not and should have been incorporated in the original plan. Given consultation deadlines, it fair and reasonable that the response should be incorporated into the wider consultation to illustrate unfairness in process.



## Infrastructure

- **Western Link proposal** – I am hearing that this project is not going forward and given all of the new houses that are proposed, it feel like this is core and centre to the whole town transport infrastructure and clarity is required prior to any decision to ratify said plan.
- **Transport** - None of the transport plans are developed to even a concept level with no evidence of and due diligence or funding routes. There is a real risk that all of the proposed houses could be developed none of the other infrastructure to support it in place. This is dangerous and does not provide the town or the planning inspectorate/

decision makers with any assurance – This should not be allowed to be delivered retrospectively and you can't sign off a plan that is not deliverable. This in itself illustrates the plan and scale of development is fundamentally flawed.

- **Facilities** - I have noted that there are proposals for new schools, roads, medical centres and community facilities.
  - On this basis, clarity is required on whether DFE have been engaged requesting capital within their pipeline outside of the recent 3 year spending review and where this engagement is up to.
  - In addition, clarity is also required on whether funding with the local CCG, NHS England and DHSC is up to in relation to requesting funding for Primary Care and Community provision to support residential growth.
  - Furthermore, have DFT, Highways England been engaged on the proposed new road infrastructure and given the proposed growth built into the plan
  - **Bridges** - why are there no new bridges proposed across the canal? It would be fair to say, that it can already take 20 minutes to get through Stockton Heath alone, how is putting more cars on the road with similar infrastructure acceptable?

**Trains/ Trams** – There is no train infrastructure within the South of Warrington and with a proposed 4,200 new homes in the South East Extension alone, there will be significant consequences on the number of cars on the road, with implications on air quality and noise pollution. Warrington already has some of the worst air quality in the UK, these proposals make it worse.

**Bus Service** - In addition, it would be fair to say that any proposal for increased bus public transport are not adequate given the evidential failings (including financial) of the Warrington Bus Service and would be a means to an end for the local authority to justify such drastic development.

**Cars/ vehicles** – given the above, lets work on an assumption with the complete lack of transport infrastructure plan that every house of the 4,200 will have two cars, that an extra 8,400 cars on the road minimum. With this, along side the proposed new leisure centre and residential offer will also bring further traffic from other areas could be up to an extra say 10,000 cars on the road, how is this sustainable development.

**S106/ CIL** – it would be fair to say that S106 or indeed CIL if implement could not fund all of this wider infrastructure and its clear that the LA has not had any proactive discussions with public sector partners or indeed, funders.

**Council Tax** - Given the above, I put it to you that this plan is fundamentally, flawed and has a key agenda in the south of building houses with higher council tax and business rates to bring in income generations for the local authority, its disgraceful and quite frankly shameful that a local authority leaders and politicians can be so disrespectful to the towns population.

**COP26/ Green belt land** – Given the above areas highlighted and the recent COP26 conference where there was a clear appetite for sustainability not just now but for future generations, I am struggling to comprehend how the scale of development on green belt is acceptable and justified. This is partly down to the fact that within Warrington there is circa brown field site availability that could support development of circa 11,800 homes. Accepting that this land is not readily available, with the 20 year plan, time could be provided to free up this land to support a more sustainable development model, creating a town centre first approach.

**Topography and Nature** – The South East area outlined within the propose plan has significant beauty and attractiveness. One has noted over the last few yaers that the river level that flows through the “Dingle” has started to reduce significantly and furthermore, I have noted significant water discoloration of water since the new David Wilson resi development off Dipping Brook Avenue has commenced. Moreover, the land within the proposed development areas is not flat and regardless of planned remediation, there could be significant drainage issues that could impact water levels of the Dingle and wider. As such, wider wildlife could be severely impacted. In addition, the proposed new roads would very much impact the existing woodland surrounding some special areas within the south i.e. the Dingle which provides a real sense of piece and community for existing and future generations. The proposed new road infrastructure is located way too close to this areas and will impact wildlife and indeed on green belt land. Indeed, it would be fair to say that that few buzzards and birds of pray we have in the south are already confused by the new Bloor Homes and David Wilson Homes developments in Appleton and these development already border woodland and natural habitat and its already having an impact. Not to mention the impact on air quality through cutting trees down as has happened on the new developments mentioned previously.

**Six 56** – the amount of warehouse and logistics proposed within the south is quite frankly frightening and I am unable to comprehend how LOCAL jobs will be created given it’s a transport model proposal with many plans within the industry to automate where possible. In addition, the scale of jobs against the scale of the land is negligible. In addition, it is well documented that in the UK we have a shortage of 100,00 HGV drivers, over the next 10-20 years, I envisage that more HGV drivers will take to the road with the aspiration from Government of getting closer to the 100,000 target with many of these vehicles coming to the south – how is this model sustainable and what value does it add to the future generations of Warrington? In addition, it is clear from recent events that Eddie Stobarts and the wider logistics industry is not sustainable, what would Warrington want to develop within this sector – surely there are greener initiatives that have less impact on the local environment, air quality and not to mention the pollution – Don’t hide behind electrification, its years behind in this sector.

**Community, Retail Infrastructure** - I have circled an area of concern below. This proposed hub is close to the motorway and could result in additional cars pulling off the motorway and using the retail an other facilities minus the petrol station, resulting in more traffic and in effect treating the area as a service station. I have a real concern that this site will be an Aldi, Lidl, Costa drive through, Greggs, gambling facility and some sort of Brewers Fayre pub etc – this would not be an attritive proposition and we have seen how these types of blended facilities fit into to wider parts of Warrington – not acceptable and could be a consequence of poor master planning by the LPA.



**Planning Policy** – I will leave it to the planning consultants to go into detail on planning policy. Nonetheless, and broadly based on my feedback, I put it to you that the revised local plan is not positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#) and the [National Planning Policy Framework](#).

It would be fair to say that through my high level feedback, I have identified a number of flaws and am very concerned that the South East allocation was not identified and developed at such a level within the previous draft plan of 2019. Whilst I appreciate that through demographics, there is always a need to build new houses and create place based regeneration, the scale of the proposals and complete neglect of true master planning and high level concept approach to all of the infrastructure inc. naming some potential community and infrastructure allocations is not acceptable. Given this the resi allocation needs scaling down significantly within clarifications of how funding will support wider growth and support communities, specifically around transport, educations, health and community provision etc, without this, the plan cannot clearly move forward and I Cllrs who represent the people should be refusing planning applications at planning committees on the grounds of lack of infrastructure and sustainable development (its your duty).

I look forward to the FOI being attached to my response submission and the wider response by way of email.

Your faithfully,

Marcus Shaw