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OBJECTION to Preferred Development Option (PDO)

Dear Sirs,

Please register my objection to the proposed plans, the reasons outlined in the headings and points below.

Also please note, for de-duplication purposes, that this document may have sent through multiple channels, i.e. both email and hardcopy through post.

Yours sincerely

[Redacted]

NB Numbers in ^(superscript) refer to references found at the end of the document

Confusion over “New City” aspirations

- Terms “Garden City Suburb” and “Warrington New City” appear multiple times in the PDO document.
- Andy Farrall was interviewed in the Warrington Guardian ⁽¹⁾ on the 7th Sept:
 - *Mr Farrall was also keen to dispel rumours over the authority having firm plans in place to make Warrington bid for city status. "The council has not made any reference to becoming a city," he said.*
- The PDO (option 2) is entirely based on the aspiration of WBC executive to create a “new city”. It is not necessarily the objective need of the town.
- It is not clear as to what (if any) benefits city status would provide.

Greenbelt assessment ⁽²⁾:

- The commissioning of Ove Arup and Partners (Arup) to carry out Greenbelt assessment, suggests a conflict of interests. Arup are consultants to the building industry “*Arup has shaped many of the defining urban projects of the modern era, leading the thinking on cities.*” source: Arup’s web site.
- There was no completely independent assessment of Greenbelt.
- Sites classified as offering a “weak contribution to greenbelt” seem to suffer in the process as a result of having natural boundaries rather than being directly next to current urban areas. From para. 87 “If a durable boundary between the parcel and built up area exists, conclude parcels makes a weaker contribution to checking unrestricted sprawl” . In the case of land parcel 10 (which will contain the bulk of new development) it is penalised under “Purpose 1: to check the unrestricted sprawl of large built-up areas” because of its western boundary being Lumb Brook and the Dingle valley and woods. To my mind this boundary with a local beauty spot adds value to its Greenbelt worth not lessens it. The entire evaluation system could therefore argued to be flawed.
- Paragraph 83 of The National Planning Policy Framework indicates that established green belt boundaries should only be altered in “exceptional circumstances”. There is no definition of what “exceptional circumstances” are and WBC have not properly explained what exceptional circumstances have occurred to necessitate such a large area of greenbelt land being destroyed.
- The Document produced was unwieldy and containing tables spanning multiple pages. No executive summary was present.

Housing and employment needs:

- A 20 year plan seems excessive. There is no requirement to produce a plan for such a lengthy period.

- No consideration was given to technological developments that affect the lifestyles and working practises of inhabitants. Without these specifics it is hard to define how much and the location of land for businesses and industry.
- No consideration has been given to new national developments such as the UK's exit from the EU which may have an impact on immigration and employment and therefore on national housing requirements.
- The PDO has not taken into recent changes to Objectively Assessed Needs (OAN) is using an overestimate of requirement based on a previous 2012 survey.
- There is no inclusion of alternative assumptions which might have generated a broader range of outcomes, some with much lower housing requirements.
- There is a deficit in the UK of affordable housing, but this type of housing only comprises 30% of what is being proposed in the PDO. It is known that construction companies do not profit as much from the construction of affordable housing as they do from higher end housing. We should not be sacrificing green belt land to allow profiteering by house builders.

Overall Impact of PDO on South Warrington:

- Significant loss of Greenbelt land
 - Sheer scale of the proposed development will entirely alter the character of the area and completely swallow up existing Villages of Grappenhall, Appleton Thorn and Stretton
 - The character of the entire area will be irreversibly altered.
- Traffic
 - Most connections into town centre are already busy due to limited crossing points of the Bridgewater Canal, Manchester Ship Canal and the River Mersey.
 - If 24,000 homes are built with an average then we can expect 28,000 extra cars in the area (national av.1.2 per household, 2011 census).
 - There is a concern that new links would pull traffic away from tolled Mersey crossing bridges
- Air quality / Lifestyle
 - Warrington has done poorly in recent surveys, being the second worst area in the Northwest behind the City of Salford.
 - Car culture is being encouraged by WBC with construction of car parks in town centre, whilst public transport and cycle ways are not being enhanced.
 - Failing to provide pedestrian and cycle routes does nothing to help the obesity epidemic.
- Wildlife and Environment

- Losing a large swathe of rural land, will impact species reliant on trees, hedgerows, streams, ponds and fields for their habitat. We know that Owls, bats, badgers, water voles, harvest mice, crested newts are present in these areas.
- Also lost will be people's access to such areas. Access to this kind of countryside will have likely been key to people's desire to settle in South Warrington.
- Creating a new urban centre
 - The PDO seems to want to create an urban centre to the south of the current town centre in pristine greenbelt. This would likely have negative effects on the existing town centre and change the character of the town giving it a "bipolar" feel. It may also reduce the focus on the current town centre which would benefit from some major improvements.

How the consultation was conducted:

- The consultation period started "out of the blue" during August 2017 when many people were away or on holiday. This seemed slightly devious and immediately set a bad tone.
- There was little evidence of any considered communication strategy with local residents other than "shock and awe".
- Public sessions overcrowded and often conducted outside of the affected areas.
- No feedback was recorded at the consultations to determine usefulness of the exercise.
- Poor consistency on specifics caused undue alarm and stress for residents in areas affected e.g. the proposed "strategic transport route" along Trans-pennine Trail and railway embankment.
- There was no direct communication from WBC with people who would be negatively affected by the plans from the WBC.
- The written documentation provided, was unduly complex with no executive summaries, seemed to obfuscate actual intentions buried within document
- Obfuscation:
 - WBC have relied too much on online documentation thus excluding people who do not have access to, or skills to use the required technology
 - Main PDF of preferred development option ⁽³⁾ contains no proper (clickable contents table) and is therefore hard to navigate
 - Many of the hyperlinks referring to other supporting documentation are broken and return the viewer to the local plan review page.
 - Document make little sense to the layperson and again no executive summary is provided.
 - On submitting feedback via the website, no email confirmation or reference number is given. The users are therefore have no way of knowing whether their concerns have been received successfully.
- The timetable does not seem to include the requirement for the production of a summary report of the consultation results.

What I would like to see happen:

- WBC should work with, not dictate to, the people of Warrington to try and find reasonable compromises to build the needed type of homes and using Greenbelt land as an absolute last resort.
- WBC should produce a ten year plan and then revisit the matter. At this point we are able to see the affect of
 - HS2 and HS3
 - Technological changes that could affect the location of industry i.e. home working, driverless vehicles etc
 - Possible decommissioning of Fiddlers Ferry power station.
- WBC should focus on the basics that the existing town requires i.e creating a town centre that provides services that people want, and can access efficiently by public transport. There is much untapped potential in developing a waterfront area and by innovatively using existing brownfield sites.

- Full disclosure of interests from all council members is required.

References:

- 1) “20-year vision for town a ‘continuation of growth’ – no city status bid in pipeline”
http://www.warringtonguardian.co.uk/news/15520755.VOTE_20_year_vision_for_town_a_continuation_of_growth_no_city_status_bid_in_pipeline/
- 2) Green belt assessment document
https://www.warrington.gov.uk/download/downloads/id/11804/green_belt_assessment_final_report_oct_2016pdf.pdf
- 3) https://www.warrington.gov.uk/download/downloads/id/13435/preferred_development_option_final_july_2017_lr.pdf