



Planning Policy Team

Warrington Borough Council
New Town House
Buttermarket Street
Warrington
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Dear Sirs

RE: Preferred Development Option - Consultation

I am writing to voice my opinion on the Preferred Development Option. I have studied the plans carefully and attended your recent event at the Park Royal Hotel. The number of people at the event, and discussions with others shows the importance of the engagement with residents and the strength of feeling on the Plan.

I fully support the need to develop a Plan, and my strong preference is that the Council develops and manages the Plan rather than Central Government.

I think the concept of a Garden City is good, but there needs to be more transparency on the rationale, objectives, dependencies and implications of the Plan. If the Plan is robust then this could be good to enable Warrington to grow into a City and become a key part of the Northern Powerhouse, building on HS2 and HS3 and regional Government devolution. However, it needs to be clear as to what elements of the Plan support growth and jobs for the existing population, and which elements supports people moving to the area.

I support the need for development of the Borough, and accept that the population growth and need for local employment should be addressed. I see this as an opportunity to improve the Borough for the community, and therefore has to be planned and implemented with great skill and expertise. This means that it must be done with the right transport infrastructure in place early on, and with firm agreements to fund the other infrastructure such as schools, shops, health and local areas as required. If the infrastructure does not materialise as planned then the Plan is compromised and will lead to problems. This would be an unacceptable lack of duty of care.

I am not against development in my "back yard". My house was part of an earlier development around existing houses. I think the Council has done a great job with the existing developments around Warrington. Living in Appleton, I really appreciate the green spaces; landscaping; cycle ways; landmarks; and the splitting of the older roads to protect the existing houses. I also appreciate that the Preferred Plan intends to continue with these features and that considerable thought has been given to these issues already. I urge the Council to continue their good work in these areas, and to establish safeguards for these features.

My Objections to the Plan

However, I do **not** support the preferred development option, as it stands, for the following reasons:

1. Stockton Heath is already struggling with congestion and insufficient parking. I think it is already very unsafe and prone to unacceptable parking practices. I suspect that there are noise and emissions issues too. There needs to be measures taken to alleviate these problems **before** any additional housing can be developed south of the Ship Canal. The Plan is predicated on the assumption that there will be a new transport link over the Ship Canal that will resolve these problems. However, there are many uncertainties about the transport link. In my opinion, there is a very real probability that the link will **not** materialise as planned, and I therefore do not agree that it is acceptable to base the Plan on this assumption for the following reasons:
 - The Plan is not detailed enough and has too many uncertainties to enable Plan options and implications to be determined, and hence to gain public support. More work is required before the Final Preferred Plan can be developed
 - The new link may never be built due to local objections and/or cost and/or lack of funding
 - The new link is planned to be too late to solve the existing problems
 - The new link may not end up as a road which will severely affect its ability to maintain or reduce congestion levels
 - The new link, even if it is a road, may not be sufficient to manage the problems. My opinion is that another link west of Warrington is also required
 - The new link may be a toll bridge which will again affect its ability to manage congestion
 - I am not aware of any planned measures to add to and/or manage Stockton Heath parking or improve the traffic management as part of this Plan. I think a hybrid approach of measures in Stockton Heath and a new road bridge are required before any development can start
 - The link seems to not cross the river, and so it just moves the traffic problem to the centre of Warrington
 - I am concerned that the new road link would be used by motorway traffic between the M56 and M6 if there are any minor or major delays, causing more congestion. We already struggle with this and I can see this getting a lot worse
 - Development of a new district centre south of the Ship Canal with a supermarket may also help alleviate the traffic issues, but again this should be an early development and may not actually materialise
2. I believe that the process that you have used to develop the Preferred Plan could be improved, and hence develop a better solution in terms of benefits to the community; better cost benefits; and with greater public support. I discuss my issues with your process below and make suggestions on areas that could be improved.

I am aware that I do not fully understand exactly how you have developed the Plan or the time, resource and cost constraints you are under in this regard. However, the lack of information on how you have made decisions is one of my major concerns.

3. I feel that a better option would be to develop the areas in North and South Warrington a more even share of the burden and opportunities. The existing infrastructure would be better able to cope and be developed for the growth much easier and probably cheaper. The impact of the congestion from issues on the motorways would be reduced.

In this case, more houses could be developed around Croft and Winwick, with good links to the Motorway. As a result, the Garden City Suburb could be smaller with a larger Country Park and less requirement for new infrastructure, and less disruption to Stockton Heath. This option seems a lot more feasible; less disruptive; and more cost beneficial to me. Has this been considered? If not why not? and if discounted, then why?

4. My observations suggest that there are many more brownfield options around the Borough, than you indicate, and these should be used and prioritised for development. This could regenerate many of the towns areas and help to meet many of the Council's Strategic Objectives. For example, it might be possible to re-develop Wilderspool Causeway and the area from Bridgefoot to Bank Quay into more upmarket local centres, with flats, shops and restaurants. I think there may be an opportunity to link Stockton Heath to Wilderspool into a larger district centre like Stockton Heath but with better parking. I am not sure how traffic could be managed though, but this might be worth investigating.
5. The focus with the development seems to be for larger and detached houses. Surely, the Council's strategy requires more affordable housing. This gives me two concerns: firstly, is the plan too focussed on attracting new people to the areas, rather than looking after the local populations needs, and secondly, is the Plan too focused on bringing in revenue rather than achieving your stated aims.
6. The Plan is justified on the basis of meeting population growth. It is not clear to me as to how much of the growth is through people from farther afield being attracted to the area. If this is intended, then this needs to be more transparent in the Plan. My objection, in this area, is that the Plan should not be justifiable on population growth alone. It should be justified on achieving WBC's Strategy; economic growth; and on a cost beneficial basis as well. I think that if this was the case then the preferred option may be different. I do recognise that the Council's Strategy is defined in many documents, but I would like to see clearer statements of strategy and the strategic objectives, and how the Plan addresses these in the publically available Preferred Plan documents. I am not convinced that the thinking is aligned.

7. I am concerned that the Waterfront area is being built on a flood plain. If this goes ahead, then there needs to be adequate flood protection and new road infrastructure, with flood protection, to gain access to this area. However, I appreciate that if this can be made to work, then this would be a good use of these resources.
8. I am not convinced that the impact on the schools, traffic and other infrastructure in the smaller development areas (Burtonwood, Lymm, Hollins Green etc.) are sufficient. It does feel like death by a thousand cuts.

Comments on the Planning Process

- I appreciate and support the quality of the work of the studies that have been undertaken and the planning of the different development areas. My issues are with the more strategic areas of the Plan; the engagement process; and that the process has not been sufficiently comprehensive.
- I expected that HM Treasury's Green Book approach, or similar, would have been used to develop the Preferred Plan. If this approach had been used then I believe that the Plan would better meet all of the requirements and would be more acceptable to the public.
- The Green Book approach develops five detailed business cases:

 - Strategic Case: presents the reasons and strategic objectives for the change, and the high-level strategic options
 - Economic Case: presents how the external economic factors impacts and supports the change
 - Financial Case: presents the financial cost benefit and value for money analyses that support the change
 - Commercial Case: presents the commercial options for change and how these will be managed and procured
 - Management Case: presents how the change will be implemented, negotiated and managed, and the implications on the existing situation
- The approach also has significant stakeholder engagement to obtain views, preferences and to gain support. It is also iterative so that options can be developed and tested with the stakeholders.
- My concern is that the five areas above have not been sufficiently addressed, and if they have, then the information is not available for scrutiny by the public and others. I might be wrong and this may have been done. I don't know. I also appreciate that you may have no duty to do this. However, the approach above is good practice and would develop a better quality and more supported Plan. The Government supports this approach for major investments for this reason.
- It is not clear what the alternative options are, and how these have been appraised and discounted.
- I support the Council's Strategy, but feel that it does not reflect and align with the Preferred Plan, nor does the Plan reflect the Strategy. I expected that the full objectives of the Plan would be disclosed. The main stated objective seems to be to meet population growth, although some others are mentioned in passing. I think there are many other objectives and these must be clear and transparent to gain support.

There should be more transparency on the strategy and reasoning behind the Preferred Plan; how it has been developed; and what options have been considered and discounted and why.

- I expected that a cost benefit analysis would have been presented. I am not convinced that the cost benefit of the Preferred Plan is the best solution.
- I expected much more stakeholder engagement and consultation.
- The maps and drawings are very difficult to comprehend. Access to bigger maps and ones with clearer roads and landmarks would help raise awareness and understanding of the good work that has been done, and lead to a more meaningful debate.

My Thoughts on How the Plan Could be Improved

From the comments above, my Preferred Plan would be similar to below:

- More community consultation and involvement going forward
- More information on the strategic objectives, options and cost benefits and economics of the Plan
- Confirmation of new traffic measures and additional parking in Stockton Heath in Phase I or earlier
- A toll-free link road with public transport to alleviate traffic congestion for North to South and vice-versa, probably with a link over the Mersey to be started early on. Also, there is a need to provide some additional capacity, and/or an alternative solution, for when the surrounding motorways have problems
- Development to be phased only after the road infrastructure is in progress and when investment funds for schools, shops, leisure and district centres are confirmed
- Confirmation that there will be sufficient health, schools etc. in all areas affected by the Plan
- A more balanced approach with two new centres: The Garden City Suburb with say 4,500 new homes; and one around Winwick and Croft with around 3,000 new homes and with a similar split of new industrial developments
- I like the concept of the Country Park. It could be a bolder and stronger feature of the Plan. Could it run through a larger part of the Garden City Suburb? The density in the B areas is high and could be reduced for the Park and with the additional developments moved elsewhere, i.e. Croft. Could some of the planning and use of the Park be community driven?
- Some confirmation that similar planning arrangements to the existing developments will be implemented for the new developments, i.e. green areas, landscaping, paths, cycle ways, landmarks etc.
- More and earlier use of brownfield sites within the Borough especially around Wilderspool and Bridgefoot to Bank Quay with re-generation developments, parking and local/district centres
- A supermarket and restaurants in the Garden City Suburb district centre to alleviate traffic congestion from South to North
- Better links to the M56 and M6 early on and with separation of heavy vehicles from the residential areas

- Adequate flood alleviation and transport links to the Waterfront development
- I would prioritise the Waterfront, brownfield sites and some of the Croft and Winwick for initial development, and with the Garden Suburb A area for secondary development as the link road is progressing
- I would like to see some more planning to ensure that the heritage of the area is fully protected and enhanced. There are many industrial archaeological sites across the Borough, and the surrounding areas, and these could be used to give better leisure activities and to raise Warrington's profile. The Council has done some great work in this area, but the Plan should take this to a new level.
- I think that the more strategic cycle ways and the Trans Pennine Trail could be better exploited for leisure and visitors, and to grow local business opportunities, i.e. cafes and shops. Again, the Council could build on the good work undertaken to date.

I hope that you find my comments constructive.

Yours faithfully

