



Dear Idf@warrington,

Would you please consider the below issues of the WARRINGTON PREFERRED LOCAL DEVELOPMENT PLAN 2017 (PLDP).

SOME IMPORTANT CONSIDERATIONS as to why WARRINGTON PREFERRED LOCAL DEVELOPMENT PLAN 2017 (PLDP in text below) should be scrapped in its entirety.

(with an accent on urban quality, local distinctiveness and traffic).

Main Issues of the PLDP:

- Housing: Increase in urban sprawl: Land + property speculation led plan.
- Significant loss of Greenbelt, landscape, ancient woodland, woodland rural character.
- Loss, destruction and / or alteration of heritage assets and local village character and architectural distinctiveness e.g. listed buildings, ancient monuments, ancient woodland.
- Traffic congestion / transportation: result in intensive and destructive road works throughout ALL Warrington both north + south.
- Latchford + Bridgewater Canal listed bridges and under-pass under very severe threat of widening, alteration, demolition
- Rural lane character under threat.
- Poor consultation: residents not contributing to the principles of the PLDP.
- Lack of a detailed plan to preserve and enhance the urban quality of north Warrington which is shown as being divided into 'development parcels' (Fig 4: 'City' Centre)
- Plan is about quantity NOT quality (e.g. improving quality of urban environment in Warrington.)

Preamble

The Warrington Preferred Local Development Plan 2017

Local Plan review and the Council's initial Local Plan 'evidence base' was formulated between 24th October and 5th December 2016 with an input of 78 responses mainly from developers and landowners as a trawl for land. Other responses were also received from Parish Councils, local residents and other stakeholders. This indicates that the plan is property / land speculator led and NOT community led from Warrington's citizens + ratepayers. Its prime purpose appears to be land speculation; not environmental quality or community led.

The PLDP document is an imbalanced report in that whilst it says much about south Warrington 'development', it says virtually nothing about how it intends to improve the urban environment in north Warrington (including the town centre) which has significantly deteriorated over the years – a top priority. Any Local Plan should focus on improving quality, bringing the town's communities together and not accommodating urban sprawl

Quality of Consultation + Information:

- The quality of consultation with the public has not been satisfactory such that the draft

proposals give the appearance of being set in stone as a fait accompli to be tinkered with.

- The public have not been consulted upon the framing of any plan aims, principles, values or proposals for Warrington. The public have been put in the negative position solely as objectors rather than as contributors to the purposes and aims of the plan.

Warringtonians need to be fully informed as to the precise and transparent procedures of public consultation, government guidance on this issue, WBC policies and as to how and by whom the consultations, comments and contributions will be independently assessed for the benefit the quality of life and urban environment for citizens.

“If a consultation exercise is to take place over a period when consultees are less able to respond, e.g. over the 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”

(Landmark Chambers: Sept. 2013: Halebank PC v Halton BC)

Statement of Disclosure of Interests:

In the name of democracy, transparency and accountability, it would be useful if Warringtonians were informed of the identity of property speculators, land + property owners, corporate bodies and other vested interests who would + are most likely to benefit financially from the proposals of PLDP. This should include councillors, corporate and non-corporate functionaries and decision makers. Councillors and officers should disclose any positions and relationships, both informal and formal, which they have with any person or organisations likely to benefit in any way from the proposals in the PLDP.

- The plan's 'evidence' justification is by commercial/business consultancies such as the globalist oriented Oxford Economics and credit rating Experian thus indicating that the plan is a business venture without a substantiated social and environmental basis.
- The 'evidence' base and assumptions of the plan are difficult to access for interrogation

Historic Warrington + Local distinctiveness: Urban Quality

- The PLDP is about quantity and NOT quality for Warrington as an integrated town. It hardly refers to Warrington north of the Manchester Ship Canal where quality of urban design, street-scape and open space should be top priority. The town and inner urban areas are in dire need of very high quality urban design which respects Warrington's unique historic architectural quality. Over the years, development control, enforcement and highway works have done little to improve the quality and attractiveness of Warrington. The town centre should create pride and identity with Warrington.
- The PLDP. Para.4.38:W5 claims to 'secure high-quality design and reinforce character and local distinctiveness....'. However, WBC has had difficulty in demonstrating sufficiently this ambition and capability. The quality of the new gargantuan constructions in the town centre and of development control and enforcement have not harmonised with the traditional historic character and scale + fine urban grain of the town centre. e.g. Shed shops along Winwick Road + in Cockhedge, poor shop fronts e.g. Bridge Street, Dial Street, Church Street, Orford Lane, Lovely Lane, Padgate Lane, Latchford Village, Stockton Heath Conservation Area, etc.

The new mega-structures in the town centre are destroying the traditional roof-scape, skyline and intimate urban grain of the town and have not contributed to local distinctiveness and attractiveness. Importantly, there are NO existing or proposed conservation areas indicated on Fig 4 'City Centre'.

- Fig 4 'City Centre' indicates land-uses on numbered development parcels. Such a notation indicates that WCB views the town centre as 'speculative property development' parcels.
- City status will put pressure on Warrington Town Centre to demolish even more of Warrington's unique architectural heritage and replace it with more anodyne, characterless and clone-town buildings.
- Warrington is becoming a Mall Town in which property speculators now own extensive tracts of central Warrington including streets formerly in the public realm. Warrington town centre increasingly does not belong to Warrington. (see Google Earth)
- There is a question to be asked as to commitment to urban conservation e.g. partial demolition of buildings contiguous with the Water Tower + furniture works. WBC does not have a dedicated Conservation Officer at Principal Officer level i.e. where it really counts. The formal post of Senior Conservation Officer was deleted some years ago
- Environmental Impact analysis is prominent by its paucity.

Traffic + Transportation: (not fully addressed in the PLDP e.g. Fig 10)

- Details of the huge traffic / transport implications for Warrington have been omitted from the PLDP because no detailed traffic computer models appear to have been tested for the road network. The implications for south Warrington, north Warrington and, in focus, Latchford and west Thelwall are potentially disastrous. Existing roads and routes will experience increased traffic congestion and pollution e.g. noise. This is a crucial component without which the plan cannot be fully assessed.
- On Monday 4th September 2017 (pm) at Park Royal exhibition, Mr Farrell informed us that no detailed transportation / traffic model had been prepared for the proposals, but was commencing. Thus:
- There is no detailed transportation / traffic / road infrastructure chapter in the report (see Contents) nor evidence of any computer modelling and analysis of the environmental, road widening or social impact of this 'development' plan throughout the borough.
- Any traffic modelling for Warrington and its sub-region should take as its basis the existing physical capacity and quality of environment of the roads such that there will be NO congestion, road widening, road works, widening of existing bridges. In other, words, the existing roads, streets, lanes, bridges and junctions in Warrington should set the absolute limit to existing traffic flows and traffic capacity AND to any increase in the urban foot-print of Warrington.
- Without such a restricted urban capacity based plan, residents, councillors and decision makers will not be able to assess the PLDP because of such an important omission? (Fig 10 is wholly inadequate) Any proposed traffic model based on environmental and social parameters should be analysed and assessed by independent consultants. (For the effect on Warrington's roads, the proposed plan is like adding extra large size + number of radiators to an existing 15mm pipe work in a central heating system i.e. there

are limits to expansion of the network without extensive re-modelling: i.e. wider pipes = wider roads)

- The new housing population will create even more intense traffic congestion and pollution throughout the town thereby negating any benefit which might accrue from the proposed western by-pass to the town centre.
- The draft proposals for Warrington would require more disruptive road widening and engineering works to accommodate increased traffic: For example, the north – south traffic movement will considerably increase the current significant pressure on the rural lanes of south Warrington and on protected Heritage Assets on the Bridgewater Canal which will most likely ‘require’ their demolition or significant alteration: The threat to the rural landscape, heritage assets and lanes of south Warrington will be hugely destructive:

NB: Traffic models can be manipulated by altering algorithms, data weighting, land use allocation (e.g. employment, shopping, housing densities, road assigning and other variables.)

ROADS + LANES affecting Heritage Assets (Listed Structures + Monuments)

- (single lane choke points and narrow lanes under pressure for demolition / widening)
- Lumb Brook Road Under-Pass: Ancient Monument (Single Lane Traffic)
Will this require the demolition of Lumb Brook Bridge + Bethesda Chapel?
- Red Lane Bridge: (Single Lane Traffic): Listed Building: Grade II:

Currently a ‘Rat Run’ from Quarry Lane and Windmill Lane which would increase by its cross-road

connection to Lyons Lane all of which will function as a major traffic artery by its eastward connection to the new urban highway serving the urban sprawl.

- Hough Lane Bridge: (single lane traffic) The increase in housing along Hough Lane will exert pressure to widen + demolish.
- Walton Bridge: (single lane traffic) very similar to Hough Lane.
- The Bridgewater Canal and the Manchester Ship Canal are a considerable impediment to north – south traffic movement.

ROADS, LANES + PLACES likely to be affected by severe traffic congestion:

Latchford Village + Knutsford Road: High level arterial road with extensive bridgeworks + slip lanes to take major traffic load of north south traffic (see Fig 10).

Latchford Village is already a traffic island! Importantly, Figure 7 indicates a sweeping major north – south arterial road along the high - level railway alignment which ends up in Latchford. Also, significantly affects south Thelwall, (Does this arterial road connect to Bridge Foot via Knutsford Road?)

Stockton Heath Village will experience significant increase in traffic from both Knutsford Road, Grappenhall which are identified as a major artery via Ackers Road and Grappenhall Road the canal-side section of which will be a rat – run to Stockton Heath)

London Road via Stockton Heath will be experience even more Traffic

Walton Road (as an extension of Grappenhall Road) will also experience increase in traffic as it connects the above roads to the Stag Pub Junction for the proposed Western bypass to Liverpool Road.

Red Lane / Windmill Lane / Quarry Lane / west end of Whitefield Road, Hill Cliffe Road will become even more of a rat – run owing to its cross – road connection with Lyons Lane.

Lumb Brook Road and Bridge Lane are defined as major arteries to connect with the newly opened (now closed) Stockton Lane. These three roads will converge at Lumb Brook Bridge. Grappenhall Hump Back Bridge will also experience significant pressure

Latest:

Now that the Red Route for the Western Bypass has been selected, even more traffic volumes + congestion can be expected along Knutsford Road, Ackers Road, Grappenhall Road (along its whole length) via Walton Road to the new Stag Pub Junction as the short circuit route for traffic coming from Grappenhall and beyond aiming for north-west and central Warrington.

This traffic has the potential to reach pre-M56 levels.

WBC are likely to advocate extensive road-works in the town on the basis of the proposed urban sprawl.

Road works are primarily controlled by highways authorities, not planning authorities and legislation. There is the danger that the road-works will go ahead regardless.

No evidence of bus companies and operators appear to have been consulted or that public transport has been part of the integral infrastructure (difficult with low density housing)

- Because of the southern location of housing adjacent to the M56, the incoming 'residents' will most likely not be employed in Warrington per se and will not identify with the town; they will use the M56 + M62 to work elsewhere. The proposed extensive warehousing is unlikely to provide substantive employment for the incoming local professional classes.
- The so called Green City southern suburbs of Warrington will merely function as suburbs to Liverpool, Manchester and Chester. They will essentially function as rate-income sources for WBC.
- The existing roads and lanes should contribute to defining the absolute limits to urban 'growth'. There should be no more urban growth and 'development' around all Warrington in order to preserve and protect its green environs, rural character + setting.

Query:

Will land + property speculators, who will profit from this urban sprawl pay for the infrastructure, associated road-works and environmental enhancement and up-grades required by this very destructive local plan from which they appear to be the prime beneficiaries?

Regards,

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