

RESPONSE TO WBC LOCAL PLAN PREFERRED DEVELOPMENT OPTION

I am writing to formally submit my concerns and objections to the current Preferred Development Option. My concerns and objections primarily concern:

- The bias of the proposals and supporting documents towards the housing developers at the expense of the Council's duty of care to protect the environment and Green Belt.
- The lack of **exceptional circumstances** for reclassifying the Green Belt.
- The absolute failure to address the already congested road and transport network and complete inadequacy of the proposed new roads to cater for the projected increase in traffic.
- The failure to address current poor air quality, but only to add to this issue with the proposed huge increase in housing and traffic.
- The basis for arriving at the need for housing growth of 24,000 over the next 15 years.
- The current state of Warrington town centre and the lack of vision for making Warrington a city, from the centre out to attract people to live here – have you walked down Bridge St recently?
- The **TOTAL** inadequacy of the consultation process.
- WBC has underestimated the depth of feeling of the Thelwall and Grappenhall residents and I believe you should be prepared for significant levels of protest and disruption should these plans be ultimately passed.

Green Belt

In today's environment, when there is greater recognition of the damage caused by climate change and the need for people to have access to green space, our Green Belt should remain Green Belt and only be reclassified in truly exceptional circumstances. Here it seems that the PDO has decided to reclassify Green Belt without exploring alternatives or demonstrating any exceptional circumstances. Surely this makes a mockery of the Green Belt classification and undermines the residents' faith in this system?

The fear is that the PDO explores the option which is preferred by the developers as it is deemed to give the developer maximum profit. The plan is for 20 years, yet the PDO sees release of all the land from Green Belt immediately, rather than utilizing alternatives first and only releasing Green Belt should circumstances become exceptional. Does this not allow the developer to be in the driving seat and land bank and build to gain maximum profit rather than have the benefit of the community as the primary driver?

I understand Weaste Lane is currently designated as a Green Belt Village yet on your 'Local Plan' it is not designated as 'Green Belt' why is this?

In my opinion the Green Belt Assessment you made with Arup appears to be made on the wrong premise instead of looking to justify how much of the Green Belt you can build on you should be trying to keep it for future generations to enjoy.

In addition this concluding paragraph of the Arup consultation document states

^{34.} , *the Local Plan Core Strategy reiterates the strong commitment to protect the Warrington Green Belt.*

In which way are your plans for the wholesale reclassification of our Green Belt consistent with this commitment – these truly are hollow words

In my view you have elected to take the easy route - asking developers where they want to see development and asking which landowners want to sell their land. Why have you totally abrogated your responsibility to lead with a strategic plan based on infrastructure and environmental impact?

Planning Approach – Strategic Need

I believe it would have been better to have started with a review of transport, environmental and infrastructure **then** to look at housing. You appear to be starting with housing first and then trying to justify your plan and add in roads and infrastructure to make it fit. A good example would be your planned road across Weaste Lane and along the Trans Pennine trail and into Latchford. I think this is an illogical route as it will only serve to funnel more traffic into Latchford which is already overloaded at morning and evening rush-hours On top of that you say it will not be built for 15 years. Have you sought advice about this route from external specialist traffic consultants ?

Agricultural Land Protection of Grades 1 and 2

It appears that within the PDO you have not tried to utilise grades 3-5 Agricultural Land in preference of and to protect the Grade 1 and 2 classifications. If you insist on building on Green Belt please can you explain why you have not given preference to the lower grade land?

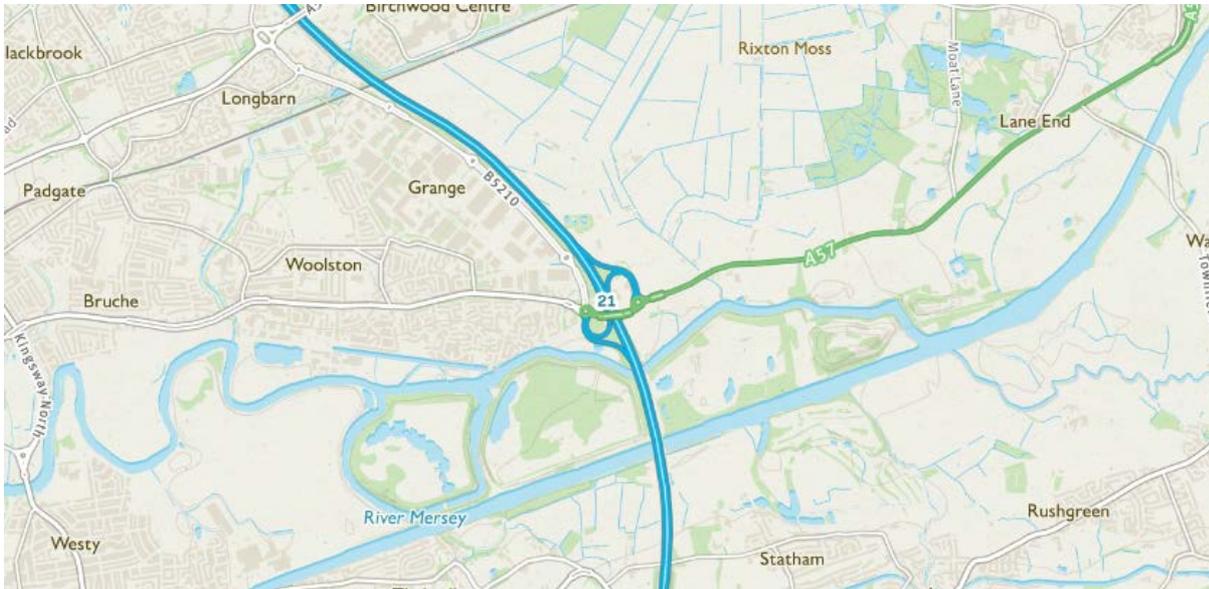
Warrington Waterfront – why can't the same approach be taken in Warrington East

The City Centre Waterfront Project looks like the perfect solution – it brings life to a neglected area and I can see with the proper mix of housing and facilities it could help to bring life back into Warrington Town Centre, If you also introduce a good mix of high density affordable housing these properties should be attractive to younger people.

Can you advise what percentage of high density housing is planned for Central Warrington?

If it is possible to build houses on the Waterfront in West Warrington, why can't the same approach be extended and taken right along the Ship Canal – there is huge scope for development through Latchford right across to Warrington East. Please explain why this land is not suitable for housing development?

It appears that it would be far easier for WBC to allow developers to use Grade 2 Agricultural Land rather than to put in the necessary investment to change for example Rixton Moss into building land. Has this been considered?



In summary you do not appear to have started with a strategic plan, have pandered to the needs of builders and not sufficiently protected the Green Belt and Agricultural Land, whilst the Waterfront idea is good in principle I do not believe that it has been fully explored and looks like you are missing a major opportunity to extend this concept.

Air Quality

The PDO relies very heavily on road transport and, by WBC's own figures, around sixty percent of all measured sites around the borough exceed harmful air pollution targets. This trend will only worsen with the increased congestion brought by the Mersey Gateway alone. Warrington already has the unenviable position of 2nd highest pollution figures in the North West. As the PDO has absolutely no mention of any strategy to improve this, the PDO will only add to our already shocking statistics for air quality. What burden will this add to Warrington health service? Should the aim not be to improve air quality, not reduce it by adding such a huge stock of new homes and with it another 35,000 cars onto WBC's roads?

This further highlights the short-sightedness of the loss of the Green Belt identified in the PDO.

The PDO ignores the impact and cost of air pollution, but worse adds to it by proposing to reclassify precious Green Belt.

Housing Need

The PDO's assessment of need seems to be over exaggerated. It is clear that the average includes some years of exceptionally high housing build between 2008, which is unlikely to be repeated, inflating the 'average' and this number has then been inflated further. There seems to be little justification for this, as there is evidence of a slowdown in natural change. The PDO was published ahead of the Government setting out details of a standardised, and nationally and regionally consistent, approach to assessing housing need based on Office of National Statistics projections.

It is expected that document will be adopted by Spring 2018. Any government review of the PDO is likely to reference the new basis in reviewing WBC's assessment of need. The latest live Office of National Statistics projection equates to an increase of 716 homes per annum until 2039. This is mainly driven by simple increase in the UK population and Warrington has historically correlated closely to the ONS statistics. Furthermore, the PDO figure is higher than WBC's own figure of 679-739pa which was published in May 2017. It appears that the PDO assessment must be significantly overestimated. There also seems to be double accounting within the figures in that jobs created by WBC's desires will be filled by those occupying the new housing. These additional jobs, should they come to fruition, are not than a reason to increase the housing supply still further. WBC has chosen to use only date which points to more housing required and ignored any contrary evidence, such as their own surveys, the effect of Brexit, the likelihood or not of HS2 and job growth.

Neither does WBC seem to have taken into account the latest Government advice on set out in the whitepaper "fixing the broken housing market", which sets out the calculations local governments should use for calculating housing need. They use ONS figures which are more realistic and take into account falling net migration. This would then put the requirement at between 14 and 17 thousand homes, with the higher figure being an absolute maximum. These homes could then fit on brownfield sites, rather than on Green Belt, particularly considering that Fiddler's Ferry will shortly become available.

How has the developer been selected? What measures have been put in place to ensure that the developers don't end up driving the type and location of housing development?

WBC's housing target is based on aspiration rather than evidence based requirements.

Overarching Duty of Care

You appear to have kept these plans deliberately quiet, if it wasn't for a few well connected individuals most of Thelwall and Grappenhall residents would not be aware of your plans.

In my opinion you try to justify the development through publishing long and overly complex reports which the average 'man on the street' or 'London Omnibus' will not have time to read nor understand - as such your actions are self-fulfilling and in my opinion totally unreasonable if not undemocratic as you have not acted in an open and inclusive manner.

I would hope that these legitimate objections and ideas for exploring the wider 'waterfront' development opportunity will be properly considered and addressed in any subsequent plan. I sincerely hope that WBC reconsiders the PDO and develops a plan that is both deliverable and one which is much more sensitive to the environment.

Yours sincerely,

