



Dear Sir

Preferred Development Consultation - July 2017

I am writing to you in response to the Local Plan issued by Warrington Borough Council on the Preferred Development Option, which I have been made aware of via the local community groups. I have attempted to complete your on-line response document but found the questions to be leading in relation to potential responses and did not fully cover the issues that I feel are key to the consultation. As a consequence I have chosen to write an individual response.

My initial reaction to the paper is that I am left perplexed as to the outline that you are proposing. I am unable to follow how you concluded that the proposed development is the preferred option. The paper does not explain this with any clarity nor substantial evidence as to why other options have been set aside. The lack of transparency as to why other options have been excluded and/or how this preferred option dovetails with other plans from WBC or neighboring areas causes me great anxiety as to the overall outcome for Warrington.

I appreciate that the consultation is about the chosen preferred option but I am not sure that I can even agree with that conclusion. Nonetheless, my response focuses on the consultation but I do implore you to consider all the options more fully, providing details of how you reached the conclusion set out in the consultation document.

My understanding is that the outcome of the consultation is either a yeh or nay to the proposed option and not a negotiation of the extent of that proposed option. If indeed a negotiation is considered appropriate that would require further consultation.

To date I have attended one consultation evening at the Park Royal that was kindly arranged by Faisal Rashid MP. This event was attended by a large number of people which I trust was reported back to the full Council. I had the opportunity to speak to a number of people at the event and I failed to find a single person that was supportive of the plan and the proposals to take away the South Warrington Green belt. I also attended the peaceful protest walk that took those that attended through the delightful Trans Pennine trail, which is referred to as a disused railway, an area that the proposed plans will remove from our landscape. There was an excellent turn out for the walk reflecting again the strength of feeling that there is opposing the proposed plans, I hope that the opportunity is taken to reflect on the support given to these events and for WBC to ignore this would be a dereliction of their duty as part of the consultation.

Before I deal with the key points of the report that I wholly object to, there are a number of questions and research observations that I would like to make. Firstly my questions:

1. Accountability. Is the Chief Executive to the Council the person that is ultimately responsible for ensuring that due process has been followed?
2. Assurance. Is the Chief Executive to the Council responsible for providing assurance that the figures, forecasts, assumptions and conclusions that have been made in this report? If not, is the full Council as a whole responsible.

Secondly: Key Research and Observations

Garden City. The Garden City should be an holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. The plans that have been presented do not in any way enhance the natural environment, in fact they are the polar opposite. 8,000 houses (approximately the equivalent of 32,000 people and 20,000 vehicles) do not in anyway enhance the environment.

The key principles are:

- **Land value capture for the benefit of the community.**
- **Strong vision, leadership and community engagement.**
- **Community ownership of land and long-term stewardship of assets.**
- **Mixed-tenure homes and housing types that are genuinely affordable.**
- **A wide range of local jobs in the Garden City within easy commuting distance of homes.**

It is not clear from the consultation that there are a wide range of jobs available. It appears to me that there is a proposal to build a retail park (a single type of labour) to create an outlet park that will

inevitably take shoppers out of the centre of Warrington, where you are also proposing to spend an enormous amount of tax payers money to enhance the shopping experience here (which I fully support as this is a much needed venture)

- **Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.**

An interesting note to include on the opportunity to grow food is the fact that the plans take away this opportunity when are so heavily populated that they will actually take away the opportunity to grow food when everything involves building on farmland.

- **Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.**

This proposal most certainly does not enhance the natural environment but will extensively eradicate it. I do not see in the plans anything about the infrastructure being comprehensively green, although I accepts that the details of this have not yet been fully thought out and assessed. Without this being done it makes it impossible for both the Council nor I to be able to determine if this principle is met.

- **Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.**

Shopping facilities, other than a large retail park, are not covered. The area that you propose to build is extensive and does not appear to cover 'walkable' shopping facilities.

- **Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.**

The transport links focus on roads bringing more cars to the area and failing in any way to address the principle to address, walking, cycling and public transport. Again your proposal actually removes the opportunities for walking and cycling will become increasingly dangerous. Do you have proposals that will embrace this point that are not included within your consultation document?

Green Belt: green belt land is a policy used in land planning to retain areas of largely undeveloped wild, or agricultural land surrounding urban areas, this presents development of the area and allows wildlife to be returned and established and maintains agricultural land. I, like the majority of other people in the South Warrington area, have chosen our properties because they are surrounded by green belt land as we do not want to live in a city, garden or otherwise. The government attaches great importance to Green Belt land that serves five purposes:

- To check the unrestricted sprawl of large built up areas **(which are proposed in your plan)**
- To prevent neighbouring towns merging into one another **(which are proposed in your plan)**

- To assist in safeguarding the country side from encroachment (**which you will fail to safeguard**)
- To preserve the setting and special character of historic towns (**which you will flaunt in your plan**)

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land (which you do not appear to have explored in any great depth before deciding on your proposed option)

Inappropriate development, is by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances. Very special circumstances will NOT exist unless the potential harm to the green belt by reason of inappropriateness and other harm is clearly outweighed by other considerations.

Such exceptions include:

Building for agriculture and forestry (**no**)

Outdoor recreations and cemeteries (**no**)

Extension or alteration to a building provided it does not result in disproportionate additions (**no**)

Replacement of a building (**no**)

LIMITED infilling in villages and limited affordable housing (**no**)

I do not therefore believe that the Plan presents any exceptional circumstances that would allow the building on Green Belt as nothing that has been presented outweighs the other considerations.

Transport

I am also struggling to understand how all the consultation documents are brought together e.g. in the FAQ on the Local Plans, you state that following the current consultation plan, the councils will be looking at the transport impacts of the Preferred Development Option in more detail to confirm if a new ship canal crossing is required. Apart from the fact that the wording of this implies that you have pre-determined the outcome of the consultation, you already appear to have consultations for transport e.g. Western. This states that the vision includes within it a further bridge for the Manchester Ship Canal with the potential to create 1,000 new jobs and 1,000 new homes, this summary statement does not indicate how many cars will come with this in addition to those in your preferred local option housing plan. I am painfully aware that Warrington cannot currently cope with the volume of traffic and therefore the proposal to build more links to the centre (including the plan to use the disused railway (disused as a railway, but not disused) to bring more traffic into the centre of Warrington without any clear direction as to how the centre will cope with this seems lack of sagaciousness. One of the clear directions for local governments when putting plans together is that they provide a clear cohesive plan that takes into account plans/developments from neighbouring councils. Not only does your plan fail to bring this into your preferred option, you disappoint the reader by not bringing it together for Warrington Local Council.

New Homes needed

In the local plan you indicate that you have chosen as your source 'Experian' which is an interesting choice given that their figures have already been proven by other councils to be unrealistic e.g. Hart. I have attempted to trace back to original documentation the figures that are quoted in the local plan but have been unable to trace them, as you have not provided reference links. I do not therefore believe that you have provided the necessary information to me to take due consideration of the figures on which your plan is based. The key point used generally in Experian forecasts is in relation to inward migration and this has been used by a number of local authorities to based their plans and as such have subsequently retracted them. Whilst these forecast suggest a rising population, they do not specifically suggest a rising population within South Warrington, your preferred development location. In fact the industrial/work is based more to the north and central Warrington with the commuter links being built into the centre. The forecasts that you have used were conducted in 2012, I understand that forecasts that are 5 years (or more) are not considered to be up to date enough for local councils to base their plans. Can you confirm the guidance that you have followed in relation to robust and relevant statistics so that I am able to review?

The assessment of inward migration appears to come from the assumption that people 'want' to live in South Warrington and not based on a need of industry in the area. The scale of this inward migration to the Grappenhall/Appleton area is merely based on the fact that housing needs are not being met elsewhere and therefore your proposal **does not meet the criteria** required to build on Green Belt land. The associated need to create jobs around this number is equally unsubstantiated as it is based on already proven flawed analysis. There is not even an indication of the margins of error around the figures that provides the reader with an indication of how reliable they may or may not be. I also believe that Experian are biased in their view of work in the Warrington area based on their clear commercial interest in the Liverpool area, another Council who has explored the use of their figures. I have viewed a number of Experian published reports and the conclusions that Experian make in their financial assessments infers that whilst they forecast financial growth, this is more in monetary terms and not the actual units which are forecast to decrease in the financial sector.

The issue of neighbouring councils is also brought to the fore in relation to local plans. Each local government should ensure that they are able to assess the neighbouring councils plans to ensure that the plans are aligned. This point is particularly prudent when branching beyond the pure house build but moves onto public services. What is the expected increase in crime? For example, what is the likely impact on policing in an already cash strapped police force lthis area, and similarly fire fighters, job centres etc etc.

I strongly recommend that before this single proposal develops that the full council considers alternative forecasts and/or explains why they have been excluded from any analysis. I would expect a local council taking forward a proposal on this scale would commission independent analysis, or at the very least a statistical critique of the evidence that is being used and that it is consistent with the Governments plan for a consistent national approach.

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Brownfield sites

Although I am not an expert in every avenue of local government plans the Preferred Option as presented, does not fully explore the opportunities that are available now or in the future (Fiddlers Ferry) that would allow for housing to be built on a large scale within the next 20 years. The opportunity to build on brown field land has to be considered prior to the approval of any plans to populate green belt land. The key part that the document fails to assess.

Finally, the consultation process.

WBC has fallen short of their obligation to consult by not ensuring that those affected by the proposals are made aware of the proposal through a lack of stakeholder consultation. The fact that I was only aware of the consultation through local residents communication highlights that lack of a clear robust plan that would ensure a full and transparent process. You are very aware of the communities view on the woeful communication that has surrounded the consultation, which you have already gone some way to acknowledge through the extension of the deadline (of which I thank you for and believe you did the right thing). The Council has drive forward a consultation process that has clear been steered by the desire to achieve a specific outcome, a biased consultation that fails to provide full details of options alongside risks. This lack of transparency has left the community feeling suspicious and lacking in confidence of the officials who have drive forward this process. As with a number of Councils plans to build on Green Belt, the Supreme Court has adjudicated on the consultation process (Supreme Court v Haringey Borough Council 2014) which outlined the consultation process that should be followed, highlighting such issues and communication and time periods to enable the public meaningful participation in the process.

In conclusion it seems to me that:

- the case for this being a green belt exception is not at all made;
- the affordability of housing on the area proposed has to be questionable in relation to those who are not at medium to higher income levels;
- although statements are made about having the right level of infrastructure it really does seem implausible across the land involved and its rurality;
- the link between the suggested housing and future employment locations is questionable, increasing the level of commuting;
- the basis of many of the assertions made is not clear not therefore robust;
and

- the extent to which due consultation process has been followed is very questionable and must therefore present a real risk of judicial review.

Yours faithfully

