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WARRINGTON
Borough Council

Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

2: Questions

Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Response:

The documentation suggests that Warrington are 'competing' for development with neighbouring councils – this is not a healthy approach.

The calculation for the number of homes appears to be based on population figures that exceed ONS projections e.g. assuming that Warrington is to become a City – this is not something that I would support, I believe most residents would not support Warrington becoming a City.

It is likely that central government focus over the next 5-10 years will be firmly on Brexit and direct impacts of Brexit, rather than on further town / city devolution.

The numbers appear to be higher than necessary, for no valid purpose, this flows through the consultation, causing additional pressures on the Green Belt, and causing distress to residents who may be affected.

Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

Response:

The calculations are excessively high – there should be no need for the scale of new homes.

The calculations show that Warrington consistently under estimates projected housing completions by 16% - this is consistent and should be reflected.

No account has been taken of the likelihood of the Hospital site becoming available – this could be built into the plan as a positive risk (e.g. "if the current hospital site becomes available for regeneration by 202'n' then there should be no need for xxx proposal / further release of Green Belt land.

The same comment above can be applied to the land around Fiddler's Ferry, should this land become available (highly likely), whilst Fiddlers Ferry is mentioned, there seems to be no appetite to use the possible opportunity to avoid unwelcome and potentially unnecessary development elsewhere.

It is unclear whether any planning has been undertaken to assist older people to down-size into smaller properties / bungalows, freeing up larger properties for families and utilising the current & future housing stock more efficiently.

Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

Response:

No, there is no mention of using green belt as a last resort, e.g. once brownfield development has met needs over the next few years

Warrington has no mandate for the appropriation of land from the Green Belt, this consultation is only the start of such a process.

As above, the amount of land proposed for release is excessive as the base population figures used are greater than independent (ONS) forecasts.

Question 4

Do you agree with the new Local Plan Objectives?

Response:

I agree with the principle of setting down a plan, but not with the specifics of this draft plan, due to the reasons set out in this document.

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Response:

The assessment of Spatial Options has been primarily developer / commercially led (primarily driven by a 'call for sites'), with no obvious consultation with residents or groups representing resident's interests prior the PDO release.

This will naturally mean that the council have not followed their moral / fiduciary duty to residents when collating these options to date – the council MUST therefore fully take on board and respond appropriately to residents views. Whilst commercial interests appear to have directed planning policy in the recent past, resident groups may have similar options though crowd funding – the end result of a litigation arms race would be expensive and cause ongoing uncertainty for all parties.

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

Response:

The assessment does not take into account the existing traffic congestion issues, particularly with the M6 Thelwall Viaduct, M56 J9 to J7 (following the A556 bypass) that would be made considerably worse by many of the development options.

Whilst documentation does state that "improvements would be needed...", these would be improvements to some of the busiest & most fragile road infrastructure in the country – and do not address the scale of the issues e.g. two M6 viaducts that are often at capacity / are sensitive to adverse weather and serious accidents.

The assessment does not take into account the lack of public transport options (no railway stations), or the expected increase in traffic that would result in such large developments into greenfield sites that would have limited amenities, and would result in additional strain on surrounding amenities that are already creaking from years of heavy development with little investment.

The assessment does not take into account the impact on the local villages (Lymm and Stockton Heath) that already suffer from high traffic, limited parking and lack of infrastructure investment.

Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

Response:

No:

The proposed SW Extension option will create a huge influx of properties into an area that has significant traffic issues both into Warrington Town centre and onto the surrounding motorway network. The majority of the roads (the M6 J20, the A50 and Cherry Lane are already suffering congestion due to the volume of traffic using the services / Lorry park); the roads through Lymm (the A56 impacted by through traffic following the A556 changes at Bowdon roundabout), Rushgreen road in Lymm due to years of badly planned development creating overcrowding and many feeder roads, and the roads around Stockton Heath and Latchford swing bridges are all suffering from severe congestion, causing air pollution, reducing travel times in and out of the area and reducing the quality of life for residents.

The proposed SW Extension would significantly erode the green spaces between current clearly defined villages of Grappenhall, Appleton and Lymm – in direct conflict with the original purpose of the Green Belt.

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

Response:

No comments

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

Response:

There is no plan provided for how current infrastructure deficiencies (road conditions and maintenance, public service provision) will be managed alongside the considerable planned increase in traffic and population.

The approach appears to be to generate more revenue through population and housing increase, without consideration as to whether the increased infrastructure requirements will be met by the increased revenue stream.

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

Response:

No comment

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Response:

See answer for question 6

The scale of this development in the proposed timescale is excessive.

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

Response:

No comment

Question 13

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Response:

The consultation has been badly managed, having been scheduled during August, the period of the year when most residents are away on summer holidays.

The documentation has been either incompetently or negligently created, requiring 3 documents to be referenced due to the use of bespoke references as unique identifiers to sites, with the reference key held in separate documents.

e.g. to determine the assessments for LY21, the following documents need to be referenced, each conflict with the prior document for this area:

1. Green Belt Assessment Final Report Final 21 October 2016 – covers general areas – LY21 is assessed as “Strong Contribution” to the Greenbelt
2. Green Belt Assessment Addendum following Regulation 18 Consultation 28 June 2017 – LY21 amended to “moderate contribution”
3. Green Belt Assessment (Additional Site Assessments of Call for Sites Reponses and SHLAA Green Belt Sites) July 2017 (file name of GB_Extra_Assessments_Final_July_2017-1.pdf does not match title). – have moved to a different referencing system, with no mapping or explanation. No reference to LY21. Going to the document: C4S_Lymm_and_Oughtrington-1.pdf, looking up the reference R18/111 and cross referencing back to the \GB_Extra_Assessments_Final_July_2017-1.pdf & the approximate area that is LY21 presents a “strong contribution” again

This is only one example -the process is complicated to the extent that most people impacted will be unable to follow, comprehend and respond with an informed opinion.

The above complications could easily have been avoided by updating a single master document, having three documents (with no obvious version control, each labelled ‘final’) conflicting is highly confusing and is at odds with the objective of engaging with communities.

There is no mention of using the Community Infrastructure Levy to help address some of the legacy of infrastructure under-investment

There is no weight behind the statement in s.4.40:

Response (Q13 continued):

There is no weight behind the statement in s.4.40:

“When considered as part of these strategic objectives, the Council considers that the exceptional circumstances can be demonstrated to justify the release of Green Belt. Green Belt release will form part of a comprehensive plan for Warrington which will work in parallel with brownfield development and infrastructure delivery to support the concept of Warrington New City. The Plan will enable the creation of new sustainable communities but in a manner which will unlock strategic infrastructure to support the growth of Warrington as a whole, addressing existing issues of congestion and unlocking major development sites with significant brownfield capacity.”

The paragraph is not validated:

1. The document does not articulate what the ‘exceptional circumstances’ are that would justify release of green belt
2. there is no detail of how this green belt development would be “sustainable”, the plan gives no detail of how existing congestion would be addressed OR how additional congestion would be avoided, these statements are factually incorrect.

Question 14

Do you agree with our approach to providing new employment land?

Response:

No comment

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

Response

No comment:

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

Response:

No comment

Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

Response:

It is assumed this question refers to the “Preferred Development Option – Consultation (July 2017)” document filename:

Preferred_Development_Option_Final_July_2017_LR-1.pdf

As above, resolve inconsistencies.

As there is only limited mention of HS2 & how this impacts on the Greenbelt, particularly as HS2 forces encroaching development into the green belt, with development options potentially encroaching into the green belt from the opposite direction.

There is no obvious mention of seeking any benefits from HS2 for Warrington – this should be remedied as a priority – there should be aspirations even though HS2 strategy is outside the control of Warrington.

Further responses

Consultation

The consultation has been badly communicated and badly managed. The main consultation events were during August when many people, my family included, were not available. My understanding is that the events were over-subscribed and attendees were generally unable to speak to people with a wide understanding of the issues, proposals and process.

The documentation as already stated is extremely complex and to get any idea of how the plan is expected to impact any given area, numerous documents have to be cross reference – the ‘filing’ system used makes this particularly difficult.

Warrington should consider whether due to the above the consultation exercise has been completed to the necessary standard to avoid future challenge. My view is that additional events should still be held, with suitable communication, notice and resources available to assist residents before and during events.

The PDO

The PDO should take more account of the need for affordable housing – in this context I mean housing that people on lower incomes can afford (rather than shared ownership schemes) – There may be ways of achieving this through innovative planning rules, which could aid the justification for releasing green belt.

There is a genuine need for additional housing, however this is being delivered by entities that have a vested interest in maximising commercial profits – the market needs to be controlled to ensure that both existing and future residents (purchasers of new properties) get the best deal. Warrington should directly address plans for how this can be achieved in the next draft of the PDO.

The PDO (continued)

s. 4.11 – table 1:

Flexibility at 5% - this should not be needed – if e.g. 5% of sites do not come forward, alternate sites would be used – if new brownfield sites do come forward, these should be considered instead of releasing Green Belt – the message to developers on this point should be clearly stated in the plan (conversely, the PDO in the current format suggests to developers that their ‘investment’ plans for building in Green Belt are rubber stamped

The fifth objective of the Strategic Plan ‘to secure high quality design which reinforces the character and local distinctiveness of Warrington’s urban areas, its countryside, its unique pattern of green spaces and its constituent settlements’ is undermined / cancelled by the scale of the proposed development in outlying areas and Green Belt – Lymm has suffered years of excessive development which is already threatening character and countryside – through massively increased traffic and reduced green space. The situation is now self feeding – due to the amount of traffic parents are more willing to drive children to school than let them walk or cycle (it feels safer cycling in central Manchester than on the roads around Lymm and between Lymm, Warrington and Stockton Heath)

Whilst plans by Peel Holdings to increase traffic along the ship canal, and the delivery of the new Mersey Gateway Bridge are excellent initiatives, they both are likely to increase traffic issues into and through Warrington at peak times, and should be actively managed (and mentioned in the plan)