

Planning and Policy Programme
Warrington Borough Council
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Dear Sir or Madam,

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 lack of exceptional circumstances for reclassifying the Green Belt.
- The failure to consider address the already congested road and transport network and inadequacy of the proposed new roads.
- 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 questionable statistics 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 crazy vision for making Warrington a city.
- The inadequacy of the consultation process and the lack of visibility that the consultation process has been given across the Warrington area.

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?

Has the PDO considered how many houses could be built if only Agricultural Land classified as Grades 3-5 plus Brown Belt was used?

In the Government Inspector's report (Mike Fox) to WBC's Local Plan Core Strategy in 2014, the housing need to 2027 was calculated at 500dpa, all of which could be met by brownfield sites. To

quote from that report "...Warrington should supply 500dpa. Therefore the plan, subject to all the proposed main modifications is consistent with meeting the full housing needs of Warrington over the plan period, having regard to the considerations that I have addressed above." The considerations included representations from planning consultants stating that 1100+dps was required and the inspector explained why such figures were excessive. Yet, in this PDO, we see that these excessive figures have re-emerged. I would also point out that, prior to the High Court ruling, WBC's position was that the required growth in the borough could be accommodated through strategic locations and proposals throughout the plan period and therefore a strategic review of the Green Belt was not required. Whilst the recently published evidence from the SHLAA (January 2016) and the Mid Mersey SHMA (January 2016) now makes it clear that there is insufficient land to meet Warrington's housing needs in accordance with the requirements of the NPPF, the Local Plan Core Strategy reiterates the strong commitment to protect the Warrington Green Belt. There is inconsistency here. A lack of demonstration of any exceptional circumstances and total failure to preserve Green Belt.

From a personal viewpoint, 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?

As a resident, and not a planning expert, it appears that WBC has elected to take the easy route - asking developers where they want to see development and then trying to justify it through publishing long and complex reports which the average 'man on the street' will not have time to read nor understand - as such your actions are self-fulfilling, and in my opinion misleading, totally unreasonable and open to 'hijacking' by developers, interested only in the size of their profit margin.

Please put residents first.

Road and Transport Network

As we are all aware, Warrington has heavily congested roads, with all too frequent bottle-necks. WBC's own documents recognise this (LTP Strategy and the PDO). Additionally, it is recognized that this situation is going to worsen with the expected 4% increase caused by the Mersey Gateway Toll bridges and general increase in car use. This is compounded by the fact that the motorway network surrounding Warrington is at capacity and cannot handle current volumes, let alone any real increase in traffic. The Highways Agency has already written to WBC stating this is a major issue and yet WBC has not proposed or funded any improvement. It is therefore apparent that the PDO contains road schemes that will do nothing to improve this situation, but rather are ill thought-out and will surely add to congestion, residents' and commuters' frustration, and poor air quality. How is an additional road, coming off the A50, dissecting Weaste Lane, disrupting the Trans Pennine Trail and depositing traffic into an already severely congested area meant to help? Further, such road schemes are seemingly intended to be funded by private investment and would not be delivered until year 15! Truly astounding.

WBC must see that the proposed canal crossings are insufficient to deliver the improvements that would be needed to support the PDO. Surely a transport model, across all forms of transport, is required, with the involvement of the Highways Agency and specialist consultants? I have no doubt (along with all the other thousands of Warrington road users) that this would demonstrate not only the required highway improvements but also that an additional 62,000 (2.3 per household) would not be able to commute around the borough. Employers will not flock to Warrington in the numbers predicted in WBC's forecast if they cannot recruit sufficient employees due to their inability to commute in a timely manner and corresponding reduction in quality of life.

No infrastructure improvements appear to have been considered or funded. WBC has failed to demonstrate that transport has been given due consideration in the PDO, rendering the PDO undeliverable.

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.

Warrington Town Centre/Warrington City

We should concentrate in getting a viable town centre for Warrington, before contemplating turning Warrington into a City. On a recent visit to Warrington, I was dismayed to see how run-down Bridge Street is. There is less and less reason to go to Warrington town centre, and more reasons to go to Altrincham, Manchester or Liverpool. How does it suddenly become a city when there are no adequate transport links, no attractions? Do the residents of Warrington want that? Do they even know what is being proposed in the PDO?

Consultation Process

The consultation has been inadequate. It even feels like there was a deliberate ploy to have a consultation of which only a limited number had knowledge and therefore restrict the number of replies. WBC failed to follow Government and their own guidance/promises on consultations.

- Public consultation without adequate advertising and held throughout peak holiday season & parliament recess.
- A refusal to extend the consultation despite requests from MPs, Local Councilors and the public. (later, a small extension was subsequently granted, but only to fall in line with the time period allowed for Parish Council Responses).
- Public consultations occurring in the least controversial areas (little in the south & none in Grappenhall/Thelwall).
- Council representatives have been unable to answer even the most basic of questions. The standard response being 'It's just a plan'.
- Use of outdated and unclear maps when presenting plans at the public consultations.
- Conflicting answers have been given to the same questions asked at different public consultation meetings and even by other WBC representatives in the same room.
- Deliberately misleading answers to questions. The subsequent impression is that WBC gave answers depending upon the audience.
- When the public became more aware and began 'spreading the message' the council reacted by calling those individuals "Scaremongers" in official correspondence. What do the council have to fear from the public?
- The use of semantics to deny points within the plan. For example; WBC's insistence that 'There are no plans to build a road on the Trans-Pennine Trail' despite it being clear on maps within the PDO.
- Conflicting messages given by Mr. A. Farrall: In an article in the Warrington Guardian he states that there are no plans for Warrington to become a city. In the PDO and WBC's website the town is referred to as, or working toward becoming a new city. 'To enable the transition of Warrington from a new town to a new city' is stated as a main aim in the PDO. This is at best misleading.

I would hope that these legitimate objections 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 more sensitive to the environment.

Yours sincerely,

