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27th September 2017

Dear [REDACTED]

Stockton Heath Parish Council Response

Warrington Borough Council Local Plan

Preferred Development Option, Regulation 18 Consultation, July 2017

I summarise, in this covering letter, the main points that Stockton Heath Parish Council wish to make in response to the consultation document on the Warrington Borough Council Preferred Development Option (PDO) covering the next 20 years. All the points SH Parish Council wish to see addressed and comments are contained in the appendix.

This letter with the appendix, reflect the views of both Parish Councillors and residents who have made contact with us.

The Parish Council is opposed to any development on green belt land, and in particular, that to the south of Stockton Heath village.

The Parish Council challenges the need to build 24,220 houses over the next 20 years. Using the normally accepted multiplier of 2.3 people per household, this equates to a population growth of 55,706 over that period. Using the Office of National Statistics and other sources, the forecast population growth for Warrington by 2037 is only 25,400. This, including the 5% increase used in the report and adding in the current backlog, equates to only 12,442 houses. The significant population increase used in the report is not adequately explained or justified.

The urban capacity (brown field sites) of 15,429 homes, quoted in the consultation document, would easily be able to cover the number required over the next 20 years based on the forecast population growth. Even more if the Fiddlers Ferry and Warrington Hospital sites become available.

We understand that Central Government has very recently issued, for consultation, guidelines for establishing housing need. This indicates that a minimum of 914 houses per year would be required to be built in Warrington. The Parish Council has not yet had the opportunity to interrogate and understand this number.

Should, however, the new Warrington Local Plan cover the more normal 15 years and use the Government minimum number (assuming guidelines are confirmed), the

housing number in the Plan could not be challenged and all the new houses could be built on brown field sites for the duration of the Plan. With a 15 year Plan, the housing number could even be increased to 1028 per year without touching green belt land. This approach would also be more likely to address lack of affordability, which is also one of the Governments objectives.

The Parish Council considers that no green belt land need be used.

The Parish Council is aware that, even before the consultation document was produced, there are proposals to build more than 1,000 houses on land outside the green belt to the south of Stockton Heath.

When the Warrington Development Corporation was in place and developing the expansion of the Town in the 1970/80's, a significant new road structure was planned, including a North/South expressway, which would have been in place before house building. The Corporation expected the Town to grow to a population of 200,000. The Corporation was disbanded prematurely before much of this was constructed. Warrington has, however, continued to grow and now has a population of over 207,000. Hence the almost daily grid lock we all experience, both in Stockton Heath village and elsewhere.

The Parish Council is opposed to any new significant development in the South before a road network, to cope with existing and new traffic volumes, is in place and the environmental impact on Stockton Heath village has been assessed and addressed.

The Parish Council understands that this may not now be possible without destruction of existing residential areas, both in the North and the South, and valued assets such as part of the Trans Pennine trail lost.

Should this be the case, development should not be permitted.

The Parish Council understands the need to have a local plan and that elements of the previous plan have been challenged. It is considered the PDO is an over-reaction and will not address the needs of the Town. The new plan should accommodate normal population growth, concentrating on affordable homes and social housing, should discourage disproportionate car growth and deal with existing traffic problems and air pollution.

The Parish Council would like to take this opportunity to thank you for the many briefing sessions that have been made available and ask you to take the views in this letter into account when developing the new draft local plan.

Yours sincerely,

[Redacted signature]

[Redacted address]

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1. The Parish Council recognises the need for Warrington Borough Council to present a new Local Plan to the Government following the challenge in the High Court.
2. SHPC would question the length of the plan being 20 years, instead of adopting a 15 year plan as is more usual.
3. SHPC would ask WBC to consider whether it is necessary to accept the mid-range target of 1113 homes per annum over the 20 year period of the plan, when projected population growth over the period would only require approximately 15,000 homes.
4. SHPC would question the criteria used to calculate housing density - whether the densities have been adjusted across the proposed developments to reflect higher density of homes per hectare on brownfield sites or whether the same density ratios have been applied across all calculations, brownfield and green belt release. If the latter is the case, then a recalculation might result in a reduction in the amount of green belt release necessary to deliver the housing proposed.
5. SHPC is concerned and dismayed by the disproportionate loss of green belt area in the South of Warrington, with the resulting loss in boundary definition and the impact on wildlife habitat. In comparing Green Belt release across the borough, 93% of green belt release will fall in the south of Warrington.
6. SHPC does not support the objective W1, the transition of Warrington from a New Town to a New City, but does support the regeneration of Inner Warrington and would ask WBC for full commitment to the statement in that objective: "the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods". SHPC does not agree that the figure of 1113 homes per annum should be the target of development.
7. SHPC, whilst agreeing with the statement of objective W2, feels that the Preferred Development Option does not actually support that statement, as the Preferred Development Option clearly requires substantial Green Belt Release, which, in the opinion of SHPC is not "sensitive release", but rather insensitive if based on the housing target figures and other data that WBC are adopting in order to underpin this plan.
8. SHPC strongly supports the objectives W3, W4, W5 and W6, but is unable to pinpoint the areas of the Preferred Development Option where these objectives are outlined as being strongly met, in particular in relation to "new infrastructure" and in minimising the "impact of development on the environment".
9. SHPC would request that a full Environmental Impact Survey be carried out for the Stockton Heath area, in support of objective W6 – making "a positive contribution to improving Warrington's air quality".
10. SHPC would ask WBC to consider a reappraisal of Option 1 of the preferred high level spatial option, alongside a new consideration of the housing development target, as this option appears to perform well against the objectives of the plan and would reduce or eliminate green belt release.
11. Whilst SHPC notes the decision of WBC to follow Option 2 of the Preferred Main Development Locations, with regard to the provision of additional infrastructure such as schools and health facilities, recent developments, that have come with the promise of such infrastructure, have failed to deliver adequately.

12. SHPC would ask WBC to consider Option 4 of the Preferred Main Development Locations as being more sustainable, creating smaller communities and spreading development across the town, providing more choice, reducing the need for large infrastructure requirements and reducing transport impact, particularly with regard to Stockton Heath District Centre.

13. SHPC supports the need to provide Employment Land Locations and recognises the need to site such locations close to the main transport links. However, again SHPC would ask WBC to consider the data used in order to arrive at the potential 381 hectare requirement, in view of a reduction in forecast population growth.

14. SHPC supports the need for the provision of Gypsy and traveller sites, although it should be recognised that the existing sites are used by travellers who have settled and are no longer transit sites. SHPC would support the sensitive identification of future sites, particularly in those areas where travelling people frequently choose to make camp.

15. SHPC recognises the need to safeguard sites where mineral deposits exist, but such sites should only be safeguarded if there is viability in terms of extraction of the mineral deposits.

16. SHPC recognises the need to plan for waste disposal and the aim of WBC to be self-sufficient in managing that waste, with regard to the sensitivity of the environment. SHPC would highlight the need for additional infrastructure needed to service an increase in housing stock, not only in relation to domestic rubbish but also in waste water facilities such as sewerage treatment and grey water disposal.

In particular, SHPC would like WBC to consider the following in relation to the Preferred Development Option:

17. The need for robust infrastructure to be in place, particularly transport infrastructure and for written statements to exist that outline the transport infrastructure to be provided and the timeline of such provision. If the proposals for a Garden City Suburb are accepted, Stockton Heath will bear much of the impact of increased traffic flow as existing road infrastructure in the area is already at over-capacity.

18. The need for considered thinking to take place with regard to the crossing points of the Manchester Ship canal from the south to the north. If the proposals for a Garden City Suburb are accepted, then an additional 8,000 homes will equate to an approximate potential of between 10,000 to 16,000 additional vehicles in the south of Warrington. Existing infrastructure will bring those wishing to move from the south to the north of the town through the district centre of Stockton Heath, on roads already operating over capacity. The resulting congestion will be detrimental to the air quality of the area, which is already at critical levels. Indeed, under the New Town Development Corporation which sought to build 50% fewer homes, proposed infrastructure which was not delivered, could now be inadequate given the doubling in proposed homes and the fact that car ownership is now far in excess of that 25 years ago.

19. The PDO, which, whilst not detailing whether it will deliver an additional crossing, appears to identify a potential crossing in conflict with the Trans-Pennine Trail, which would be an unacceptable route and would not support the objectives of the plan, particularly W4. In addition, the provision of a crossing, whilst providing an alternative to existing routes from south to north, needs to be supported on the north side with additional road infrastructure in order to provide an efficient means to continue the journey across the town.

20. SHPC is concerned that there are no details relating to the supply of both affordable housing and social housing and no specific mention of the housing requirements reflecting the increase in smaller family units or provision for older people. Additionally, it is not clear how the building of a Garden City Suburb would support the supply of such housing, as traditionally homes in the south of the borough, and in suburbs in general, tend to be larger in square footage, built at lower density and therefore command higher market values.

21. SHPC would ask that development of green belt release land is not commenced whilst town centre and brownfield sites are still available as development sites and that additional brownfield sites which may become available (for example Fiddlers Ferry and Warrington Hospital) during the period of the plan are included in the brownfield calculation.

22. Finally, SHPC would like to comment that the consultation exercise was not efficient in reaching the population at the outset, being timed during school summer holidays and the traditional recess. Whilst it is recognised that the period was delayed due to the purdah period of the General Election, more could have been done to facilitate the wider publicising of the release of the document. The extension of the response period is welcomed.