

Planning and Policy Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH



28 September 2017

Dear Madam/Sir

WBC Preferred Development Option Response.

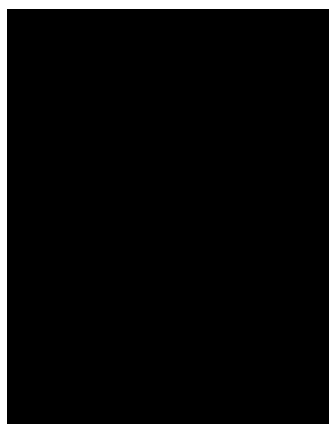
I am writing to object to WBC's PDO in the strongest terms. There are many reasons for this but I particularly draw your attention to: -

- Your totally farcical and inadequate consultation process
- Your reliance upon flawed data, particularly for housing numbers, throughout the PDO
- Your failure to demonstrate exceptional circumstances to justify use of Greenbelt
- Your failure to demonstrate you have assessed the environmental, and societal impact of your proposals.

Consultation Process

You have spectacularly failed in your "common law duty of fairness" to undertake a fair consultation as is required following the 2014 Supreme Court case involving another Borough Council, Haringey.

Whilst the timing of the PDO consultation during the main summer holiday break and its low-profile advertising, apart from in the Westmorland Gazette, are reprehensible enough but your total failure to specifically identify and consult with residents on Weaste Lane who will undoubtedly be worse off by the construction of your strategic transport route is further evidence of your common law failure. Bad enough that it was left to residents to leaflet and produce street notices at their own expense.



I watched [REDACTED] at the Stretton consultation meeting respond to a question by a member of the public. When asked by a resident why he had to find out about the proposals in the pub and why he had not received a letter or leaflet [REDACTED] who put his hands on his hips in an extremely aggressive manner, stated that “we the council don’t and don’t have to do have to do that”. As he had not asked the resident where he lived and how he was likely to be impacted by the plans, and as it is conceivable the resident could be someone worse off as a result of the PDO, [REDACTED] not only failed in his duty to apply fairness he demonstrated his lack of understanding of his duty, as a senior council officer.

I note that WBC have removed the designated email address from the council website and there have been multiple reports this week from residents who have been unable to submit their responses in this way. When phoning the council to enquire as to why this was happening my husband was told that you had problems with your corporate servers. As this happened over several days the council failed to maintain an official and publicised route that many residents were clearly expecting to use, as is their democratic right. Further evidence of the insufficiency of your consultation on the grounds of duty of fairness.

I have endeavoured to help elderly neighbours, who are not users of modern technology, to find out about your consultation and to get them information about the PDO and response form. Despite having been reassured that these would be available at local libraries this was not the case and residents were told they had to travel to the town hall. As on Weaste Lane buses only run on Tuesdays and Fridays this was not an acceptable response and further evidence of WBC’s disregard for their residents.

I spent over 6 hours at Stretton on the day of the consultation there. I observed how residents queued to get into the hotel car park, queued to get into the hotel and then found it impossible to view the displays due to the density of people. There were many people who left before getting into the hotel as they were unable to wait any longer. When talking to council officers I found them poorly informed and unable to answer even the most basic questions about boundaries, timescales, housing types, density etc. It was unacceptable to send council staff to this meeting who were not in possession of the facts. In so doing WBC further undermined its consultation process. I collected over 500 email addresses from residents attending the Stretton meeting who gave me their details because they wanted to be given more information than they had been able to access from WBC.

Flawed Data & Housing Numbers

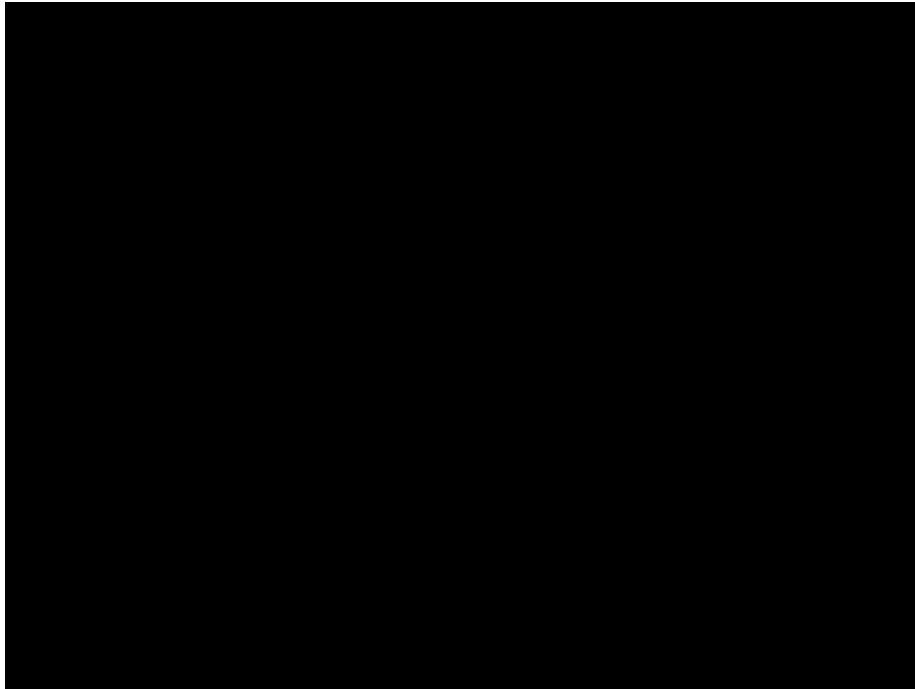
The PDO documentation fails to explain why you have stated a housing need of 839pa rather than WBC’s own revised figure of up to 739pa (May 2017). By taking this figure and using it in the Economic Development Needs Assessment (EDNA) it has the effect of over estimating requirements therefore appearing to confirm your (and the developers) desire for additional homes. This methodology is flawed.

[REDACTED]

Given that the Government is now consulting on its new methodology for assessing housing need in “Fixing the Broken Housing Market” it is untenable that WBC continues trying to apply inaccurate and flawed historical figures to an LDP that will not be in place before the new policy comes into use in the Spring of 2018.

This new methodology does of course suggest that Warrington should be planning for 15 – 16K homes, all of which could be accommodated on brown field sites rather than Greenbelt that on the whole is in active agricultural use producing food, which post Brexit, Britain may become more reliant upon.

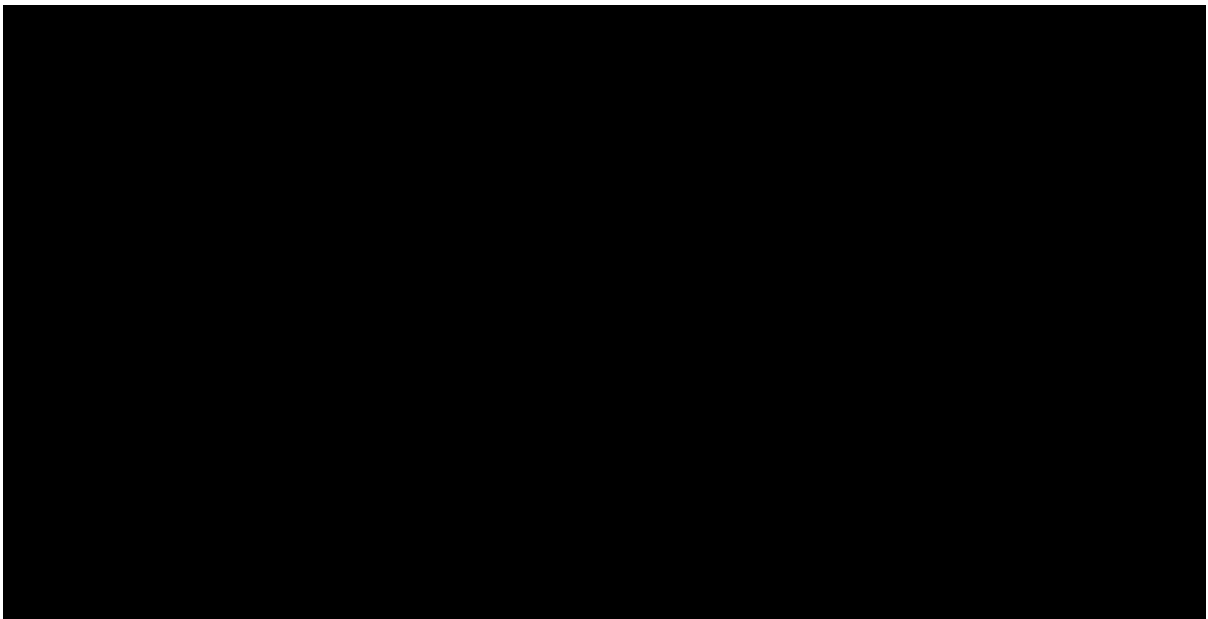
It is unacceptable that you have ignored Fiddler’s Ferry and options that would have involved building on brownfield sites elsewhere in Warrington. As a Labour led council I would expect you to take heed of Jeremy Corbyn’s assertion that land banking is unacceptable and I presume you will move to ensure all brownfield land held by developers is called upon for the LDP prior to any release of Greenbelt.



Your planned growth in Warrington’s population, which is higher than the ONS published figures of approximately 20K growth over the next 20 years, are untenable in a post Brexit situation and since Warrington has been excluded from HS2. It is clear therefore that unless the number of residents per house hold falls to less than 1 Warrington does not need 24K new homes. What demonstrates this far better of course is the response from the Planning Inspector of Warrington’s LDP in 2014 that stated 500 houses pa was an appropriate number. Future housing numbers should be planned on objectively assessed need, not the aspirations of developers keen to capitalise on the lower costs of building of Greenbelt land.

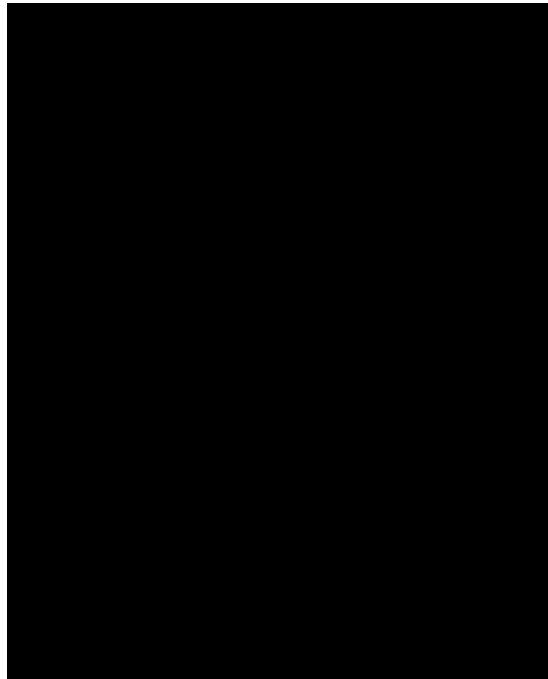


The housing densities proposed in the plan are unrealistic for a number of reasons. The main factor being that they are not representative of densities used to plan affordable housing. If you examine population projections more closely you will see that Warrington's demographics project higher growth in the older population suggesting a need for more retirement type homes with smaller and easily managed plots, i.e. lower density housing. Evidence from other urban areas in the North West, and particularly Manchester, show that young people want to live in vibrant urban settings with access to retail, leisure and likeminded communities. The centre of Warrington, which is currently a disgrace the council should be ashamed of, presents an ideal opportunity to build such a place. A further benefit of such an approach being that there would be no requirement to build polluting roads for more people to commute into town from the periphery of Warrington.



Residents are all too aware of Peel's proposal to develop Port Warrington bringing with it the requirement for freight movement and "industrialisation" in the heart of our town. Presumably this is the true reason for constructing transport infrastructure links to the already heavily congested Motorway networks around the town rather than the alleged reason to give all the new residents of south Warrington a new route into town. WBC's lack of imagination around alternative transport options including true networks of safe walking and cycling routes is inexcusable especially since you are even proposing to remove part of the very much used Trans Pennine Trail.





Given the lack of certainty over Brexit, the continued faltering of the economy, soon to be impacted by interest rate rises, it would be prudent, and WBC should be planning on a 10 or 15-year timescale, rather than the 20 years it has elected to use. There are many examples in the North West, particularly the picturesque Ribble Valley where over development of low density housing has resulted in empty properties and falling house prices. This is a situation that WBC must take more care to avoid than appears to be the case currently.

Failure to Demonstrate Exceptional Circumstances for Use of Greenbelt

The PDO appears to be ignoring the requirement in the National Planning Policy Framework (NPPF) to preserve the permanence and openness of Greenbelt. Given your exclusion of some options that would involve use of Brownfield sites other than in South Warrington you have failed to recognise the contribution Greenbelt land around the town makes towards checking the unrestricted sprawl of large built-up areas, and to safeguard the countryside from encroachment.

Rather than promoting and enhancing the use of Greenbelt for the local population, as required by the NPPF, you are proposing to remove this precious asset from the whole population of Warrington, without valid justification. For this reason, the PDO is untenable.

Your proposal to “safeguard” existing Greenbelt land to make it somewhat easier to offer it up for development in the future is a lazy and devious mechanism to try and claim in the future that that land can be released without any further public scrutiny. This too goes against your responsibilities to ensure that Greenbelt boundaries extend beyond the period of local plans.

Failure to demonstrate you have assessed the environmental, and societal impacts.

There is no evidence in the PDO documentation that you have undertaken even a basic environmental assessment in relation to air pollution – your own website published information



about how in 2015, 60% of the sites where you monitor air quality failed the accepted threshold for Nitrous Oxide. Likewise, Warrington already has a higher percentage of households with 2 or more vehicles (36%) than the rest of the North West (27%) or UK (30%). Building houses away from the existing urban infrastructure is going to lead to many forms of pollution but in particular air pollution. Whilst the environment agency flood assessments for much of the geographical area included in the plan are currently low, it is unacceptable that no assessment has been made about how this would be changed by the impact of “run off” caused by new roads and houses rather than the countryside that is already frequently heavily waterlogged. The impact of climate change with increasing occasions when flood waters exceed the levels predicted by the environment agency is not a factor to be ignored and yet the PDO is silent on this matter, despite the fact that within the last 2 years Thelwall experienced significant flooding.

Likewise, there is no evidence of infrastructure assessments or planning for electricity generation, waste disposal, sewage treatment. Several members of the council have publicly stated that no houses will be built until the infrastructure is in place. Whilst WBC may view this as meaning roads residents will undoubtedly view these as essential amenities that will need to have been planned in detail.

Part of this planning will be the essential requirement for proper wildlife surveys and reviews of the impact of any proposed building on Greenbelt. The fact that South Warrington is actively farmed and has been largely protected from development has resulted in a rich and diverse biodiversity with evidence of protected species including Red Kites, Bats, Hares, Water Voles and Newts. It is astounding that WBC felt it appropriate to publish their plans without first having examined these important factors.

Little has been said in the plan about essential public services. Whilst schools and health services are referred to there has clearly been no proper assessment of true need and certainly no clarity about how these are to be afforded. The NHS in Cheshire and Merseyside has to save over £ 900 million in the next 3 years, all of Warrington’s NHS organisations have been deemed by the CQC to require improvement, and there is a national shortage of doctors and nurses, a situation that it is known will deteriorate as a result of Brexit. It is disingenuous to suggest that these facilities will be in place without having demonstrated the types, size and timescale for their delivery. Equally lacking is any reference to other essential aspects of community living including nursing and residential homes, sheltered housing, and community meeting places, which are currently essential aspects of village life in the communities your plan intends to destroy.

I should like a personal response to this letter please proving answers to all those areas where I have highlighted the lack of information and detail you have failed to provide during your sub-standard consultation process.

Yours faithfully

[REDACTED]

[REDACTED]