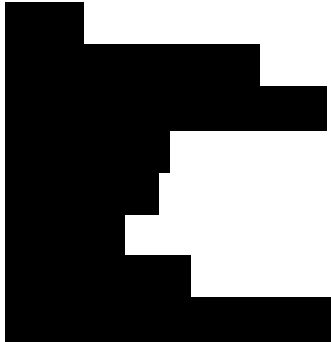


Warrington Borough Council Local Plan - Preferred Development Option Regulation 18 Consultation



Here are my objections to the Preferred Development Option (PDO).

In summary the impression given by the PDO, supporting documents and overall process is that Warrington Borough Council (WBC) have started with the position they want to end up with and then used the information gathered in a highly selective and partial way using models and assumptions that are open to question in order to support the PDO.

1. The need for 24774 new homes is not supported by the Council's own figures and ONS Data

The LD Plan and its projected population and numbers of new houses contains anomalies.

The LD Plan Table 4.11 (Appendix A) indicates a requirement for 24220 new homes by 2037 which at 2.3 people per house implies an increase of 55,700 on the current population of 207,700 to 263,400. That's an increase of 26%. The ONS population projection for the UK shows an increase of 13% over the same period. Why is WBC wanting to project double the national figure and why is that felt to be reasonable let alone acceptable.

The Council's own population projection for 2037 (Appendix B) shows a population of 232400 which is slightly different to Table 8 of the Council's Strategic Housing Market Assessment (Appendix C) which shows a projected population in 2037 of 234,525 up by 26,825 from the current population of 207,700.

If we assume 2.3 people per dwelling and a population increase of 26,825 then that would imply an additional 11,663 new homes are required, however Paragraph 2.7 in the Council's preferred development option (and Appendix A) indicates a delivery of 1,113 new homes p.a. over 20 years which equates to 22,260 homes by 2037.

The Household projection for 2037 from Table 406 in the ONS projections (Appendix D) shows a housing increase of 14000 from the current 91000 to 105000 which I contrast with the LD Plan (Appendix A) indicating 24,220 new homes are required.

Using the ONS housing projection of 14,000 new homes at 2.3 people per dwelling implies an increase in population of 32,200 up to 239,900 from the current population of 20770. This is much nearer the Council's projection of 232400.

When asked about this apparent anomaly, the Council has said in an email

"Our preferred development option will require additional in-migration over and above the ONS projection. "

Which I understand to mean that the difference is due to the projected increase in new jobs and the consequent additional population this will bring. This raises the obvious question why does the PDO not explicitly say so? It's not clear at all why projected jobs growth and the increased population this brings is translated into housing demand and added into the housing demand already defined by the overall population projection.

The ONS Household Projections 2014-based Methodological Reports which explain how housing projections are derived says (inter alia)

"The LFS (Labour Force Survey) is a sample survey and as such subject to a margin of error but the data are far more up-to-date than the Census and some allowance for recent movements in the LFS are considered necessary."

I interpret this to mean that the LFS (or Jobs) is an element which is used as part of the process of producing housing statistics. In other words WBC seem to be 'double counting'. They are basing housing need on two elements, projected population growth plus jobs growth. But it would seem that the ONS population growth numbers already factor in jobs growth

To put this in perspective if all authorities throughout the UK were to replicate this level of new development then the UK population would increase by 16 million people.

Such a level of growth is by any stretch of the imagination intolerable, unwanted and unsustainable.

2. Not enough time has been allowed for public consultation and the duty of fairness.

There are many hundreds of densely worded pages, maps and tables of information in the Local Plan and all the associated supporting documents. Clearly this has taken thousands of man hours to compile. In addition external expert consultants have been involved for many months stretching back to at least 2016. In places statistics are stated as fact without evidencing the supporting material or considering other interpretations.

In other places clearly subjective judgments have been made, again without any justification. e.g. PDO 2.6, 2.11, 2.16, 2.17, 2.32, 4.6, 4.17, 4.40

The public were never seriously involved at the precursor Scope and Contents 'consultation' [sic] in 2016. No links were made to interested parties, local groups or other representatives.

The detailed PDO public consultation only commenced on July 18th 2017 and has belatedly been extended to 29th September. This period covered the school holidays with many people away on holiday and unable to become involved in the consultation until their return. What basis did WBC use to define the period of consultation?

Given the number of man hours officials have spent compiling the plan, to give the public a mere 10 weeks to receive, examine, understand and comment on the plan is just not acceptable. Particularly considering that people who do want to seek various statistics and other information from the Council in an attempt to check various aspects have to wait 20 working days for a freedom of information request to progress through the system.

The 2014 Supreme Court case against Haringey Council (R(BAPIO Action Limited) v Secretary of State made it clear that there is a common law duty to consult fairly and that duty of fairness is higher when depriving someone of something. WBC should have identified and consulted those that were affected by hand delivered letters along with street notices and press releases. This did not happen. The courts have held that use of a Council's web site alone is not sufficient.

There has been no formal communication policy. Hard copies of all the supporting documents has not been available and the on line maps are difficult to read since the colours do not stand out.

3. The Green Belt

There is an absolute government requirement to demonstrate 'exceptional circumstances' for releasing green belt. **There is nothing in the plan that unequivocally explains what exceptional circumstances have been used** as a basis for the huge land grab of green belt. All the plan says is that

"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"

This is a classic case of begging the question, (petitio principii) and I use that in the correct meaning of the phrase and not simply the oft misused meaning of prompting a question), i.e. the logical fallacy whereby the statement under question is assumed to be true. In other words using a premise to support itself.

Since no Exceptional circumstances have been offered the plan must be rejected. This is an absolute requirement.

Warrington has 11,500 hectares of Green Belt

The Green Belt has been an outstanding success since the concept was first created. When it was designated it clearly had to meet the test of durability at that time. WBC have not demonstrated what exceptional circumstances have changed that would now permit the green belt to be reduced.

There is no evidence that young people want to buy houses in a 'Garden City' three miles from the town centre. They want to live close to where everything is happening – presumably the very reason WBC are developing Times Square in the centre. Every effort should be made to use existing or projected new Brown land sites in or immediately around the town centre.

There are two sites which will, over the next 20 years become available as Brown land. These are

a) Fiddler's Ferry Power station

Fiddler's Ferry will close long before the end of the 20 year period; it is government policy to close all coal-fired power stations - the sister plant at Didcot has already been demolished. A new power station operating on gas or biomass would require a much smaller footprint.

b) Warrington Hospital

In February 2017, Mel Pickup the Chief Executive of Warrington Hospital confirmed that a move was being considered, citing the fact that the town's health infrastructure was struggling to cope with demand, spiralling maintenance costs (parts of the hospital are over 100 years old) and gridlocked car parks. She said "Now is the time to consider planning for a new state-of-the-art, modern hospital for the people of Warrington and Halton."

If these two sites are included there would be no need for any loss of Green Belt at all if a realistic number for new housing is used.

Paragraph 83 of The National Planning Policy Framework indicates that established Green Belt boundaries should only be altered in "exceptional circumstances". "Exceptional circumstances" is not defined. The council indicate on page 15 that they believe that these are exceptional circumstances the reasoning is not clear.

This land is not unused. It is actively used for agricultural purposes. Given the long time scale of the development and the relative inaccuracy of any modelling used in the later stages, along with the current uncertainties of Brexit and broader climate change, using no greenbelt land, or at least a smaller portion of it, should be considered.

Jobs growth does not necessarily mean people will come to live in the borough and need housing, and the effect of cities like Manchester and Liverpool sucking people away from Warrington as they develop their own conurbations, thus reducing the town's population does not seem to have been factored into the plan.

Bridge Street businesses have been dying for years, and now Golden Square is seeing the same thing happening with large department stores and other shops closing down. No account seems to have been taken of this reduction in jobs.

The wards currently covered by the Garden City Suburb and the SW Extension currently have 76% of their area as green belt. If the Plan is adopted then they will be left with just 51%. That is a significant reduction and most of us would consider that inappropriate.

WBC should not be surprised if when they call for the identification of available sites that those who hold land in the green belt will come forward and offer it. Developers will generally prefer to build on green belt since the costs of construction are lower than brownfield sites.

Now that WBC has an investment in Redwood Bank there is suspicion that they are not a disinterested party and concern that they will want to loan or subsidise developers.

In short there is a potential conflict of interest here. Will WBC confirm there has been no discussion or mention of Redwood Bank in the context of the PDO?

PDO paragraph 4.88 indicates that the current illegal traveller site at Cartridge Lane currently in the green belt will be removed from the green belt and granted formal permission. Although 4.88 shows the site as having 6 pitches. The truth is somewhat different. Since 2008 this has been an illegal site with the number of actual pitches increasing from the 6 that is presumably in the original application. Indeed the last retrospective application – which was rejected by the inspector, is for 10 caravans and two mobile homes.

4. The public have never been asked about the Local Plan Objectives

The government guidance on Local Plans (<https://www.gov.uk/guidance/local-plans--2>) says, inter alia

Local planning authorities will need to identify and engage at an early stage with all those that may be interested in the development or content of the Local Plan, including those groups who may be affected by its proposals but who do not play an active part in most consultations.

Local neighbourhood groups, parish councils or others have not been engaged at **‘an early stage’**. It’s clear that many have only become aware since the Council’s preferred option for the Local Plan has been written and opened for public consultation on 18th July and after the Council had arrived at its preference.

This current process is described as a ‘consultation’ but it is far away from being at an early stage. Rather it is at a very late stage.

Point 2.20 in the council’s ‘Preferred Development Option Regulation 18 Consultation July 2017’ document says that Warrington has significant ambitions for economic growth. However the people of Warrington have never been asked if they too have such significant ambitions, particularly now that the talk is of 24774 new homes by 2037. It is common knowledge that the council’s Executive Board desperately want Warrington to have City status but that desire is not, as far as I’m aware a genuine reflection of what the public want. The plan document is riddled with phrases like

“Warrington has significant ambitions for economic growth” (page 7)

“decision to plan for a level of growth over and above the baseline economic growth forecasts” (page 13)

“a unique opportunity for Warrington to make the transition from a New Town into a New City” (page 13)

“development needs arising from its growth aspirations” (page 15)

“an ambitious plan for the future growth of Warrington” (page 31)

The sheer scale of the development has horrified most residents who live in the so called ‘Garden City suburb’. Orwell at his best couldn’t have dreamed up such a rich Newspeak phrase.

The smaller villages of Appleton Thorn, Grappenhall and Stretton are currently separated from one another by fields. These will be completely surrounded by the new residential developments and the character, history and heritage of the area will be destroyed forever. The ability to access and enjoy green space is an amenity in itself and the loss of such a significant amount of green space will be detrimental to all residents, not just local ones.

All of which suggest that the Council have not approached this subject in a disinterested and objective way and they have worked backwards from the result they want to produce their partial supporting arguments.

5. The accuracy and completeness of the modelling used

The plan is looking forward 20 years. Who can realistically predict with any sort of accuracy what life will be like in 20 years? If history tells us anything at all it's that it will never turn out as expected and there are always unintended consequences that are never considered.

I can see nowhere in the plan or supporting documents where the effects of disruptive or revolutionary technologies have been factored in.

Examples of such things are:

- a) The government's policy to abolish petrol and diesel cars by 2040
- b) The development and application of Artificial Intelligence in the industrial, commercial and domestic fields
- c) The effect of Brexit on population change
- d) The advent of driverless cars and lorries
- e) The use of airships for transporting containers.

6. The Warrington Garden City Suburb

6.1 Transport

a) The proposed Garden City suburb will see 9000 new homes. If we make the reasonable low assumption of 1 car per household and that at peak times if just 10% of those cars are on the local roads then the road space occupied, assuming 10 metres between cars would be 9 Km. It is approximately 4 Km from Grappenhall Village to the town centre. It is clear to see the significant effect this would have on local roads and the environment. The PDO fails to address this.

That of course is just for the Garden City Suburb. If we use the circa 24000 homes foreseen by the PDO then if just 10% of those are on the road at the same time the town will have an extra 24 Km of nose to tail traffic. That would clearly be intolerable.

b) Whenever there is a traffic incident on the M6 or M56 which restricts the flow along the motorway, traffic leaving the motorway in an attempt to get through causes serious problems as it tries to transit the town centre.

The preferred option includes an 'Eastern Link Road' from M56 Junction 10 to the north of the Manchester Ship Canal which would cut right through the proposed new residential areas. This would provide a new LGV access road to the Barleycastle Trading Estate which, at the moment, is only accessible from the M6 junction. It would also provide an alternative route for traffic caught up in problems on the M56 / M6 motorways resulting in the deterioration of the quality of life for residents who will be subjected to increased noise, pollution and vibration from the increased traffic flow.

c) New Bus Route - Broad Lane & Stockton Lane Grappenhall.

These roads are to be upgraded to cater for a new 'strategic' bus route. The plan offers no evidence that such a bus route is necessary. Have those who put the plan together ever observed how empty the buses are? The majority of the new housing will cater for upwardly mobile families who almost certainly will have at least on average 1.5 cars per household. These families just don't use buses, as can be observed by the number of cars that clog up the roads at school start and end times.

d) Stockton Heath is already over capacity

Stockton Heath is not mentioned in the PDO but the impact of the Garden City Suburb and the Warrington South West Extension on the village will be enormous.

The traffic lights at the A49 / A56 junction in Stockton Heath are already operating at capacity and the A49 flowing through the village is frequently at a standstill.

e) Strategic Traffic matters

A high level traffic survey has not been included in the PDO.

Warrington is at the centre of the M6, M56 and M62 motorways and is affected detrimentally whenever there are problems on the motorway network.

The PDO includes an 'Eastern Link Road' from M56 Junction 10 to the north of the Manchester Ship Canal this route would cut right through the proposed new residential areas). On the downside, this would provide a new HGV access road to the Barleycastle Trading Estate (which, at the moment, is only accessible from the M6 junction). It would also provide an alternative route for traffic caught up in problems on the M56 / M6 motorways. As such, this will result in the deterioration of the quality of life for current residents who will be subjected to increased noise, pollution and vibration from the increased traffic flow.

The PDO also suggest the use of an old railway embankment and bridge to the west of Latchford Locks as a new strategic transport route. However the PDO fails to indicate how this would be tied into the existing road network

6.2 Housing Types.

Paragraph 2.44 of the Local Plan Strategic Housing Land Availability Assessment document says

"It is the Council's opinion that achievability should take a long-term view. This is in keeping with Government advice that viability assessments and related work should ignore extremes within the market. Whilst evidence suggests that some high density apartment schemes could be considered unachievable at present, they may be achievable in the longer term particularly where there is clear evidence of underlying demand. In such a scenario, the critical issue for the assessment is not whether the site is achievable at present but when within the future, if at all, it will become achievable."

The Local plan does not define 'high density' nor evidence the statement that high density 'could' be considered unavailable. Why? Many towns and cities around the world provide

higher density housing apartments and flats. I'm not referring to a Grenfell Tower but there must be scope for apartments and flats of up to say six stories. Manchester and Liverpool provide much larger accommodation, why not Warrington. Higher density on central brownfield sites would mean less green belt would be needed for housing.

7. Not Sustainable

The government defines sustainable development as making the necessary decisions now to realise our vision of stimulating economic growth and tackling the deficit, maximising wellbeing and protecting our environment, without affecting the ability of future generations to do the same.

The town centre has suffered far too much destruction of its historic buildings, distinctive identity, local culture and character by the building of shed shops, malls and huge car parks. The massive growth proposed will result in yet more destruction of Warrington and its environs and it's hard to see how, when so many people are opposed to this plan, that it meets the requirement to "maximise wellbeing and protect the environment without affecting the ability of future generations to do the same."

8. Warrington Hospital

No allowance has been made in the plan for the likely relocation of Warrington Hospital which if it were to be south of the ship canal would have significant implications for traffic on roads that will be even more overcrowded by virtue of the new housing.

It's no good Warrington arguing that the plan can't take account of a new Hospital site which hasn't yet been confirmed since the modelling used in the plan supporting documents for other aspects is just that – a model not fact.

9. Stockton Lane - Grappenhall

In 2004 and because of a tragic accident when two people were killed in a car that skidded into the Bridgewater canal, Stockton lane was closed and made a no through road. In the plan Stockton Lane is to be opened as a bus route. Has it suddenly become safer?

There are no details in the plan which explain how similar accidents are to be avoided in the future.

10. Flooding

Little mention has been made about the effect that concreting over green belt to accommodate 9000 houses will have. All the plan says is

"All key infrastructure requirements to support the delivery of the Local Plan, ... **will be set out**"

That is simply not good enough. We are constantly being told that concreting over front gardens is bad since rainfall is no longer held in the ground and runs off creating floods on lower levels. The Garden City Suburb is predominantly on land sloping down and the chance of flooding is significantly increased.

11. Continuing disruption for 20 years

Since the plan lasts 20 years the continuing disruption of construction traffic and related activities for that period will cause misery to all who live in the area.

After construction the traffic generated by extra cars, the traffic noise and pollution will lead to a deterioration in people's health and welfare.

What good is there in living in Warrington if there is no decent quality of life?