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23rd September 2017

Warrington Borough Council

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

Dear Sirs,

Local Plan Preferred Development Option Consultation

We are residents of Warrington and this letter is our representation on the Local Plan in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012. We wish to raise serious concerns with the Local Plan, which must be addressed before the plan is submitted to the Secretary of State for Communities and Local Government.

These concerns are, in summary:

- Inadequate consultation
- Unsuitable strategic objectives
- Inappropriate and unrealistic housing growth plans
- Complete lack of evidence to demonstrate exceptional circumstances for release of green belt

Together these concerns are of such a serious nature to require fundamental revision of the Local Plan and re-consultation before the plan is taken forwards.

Inadequate consultation

The council has failed to consult adequately on the development of the Local Plan. As local residents the first time we became aware of the consultation was a letter which we received from Faisal Rashid, the Member of Parliament for Warrington South, in early September. We have not seen any promotion of the Local Plan consultation by Warrington Borough Council.

We attempted to attend the consultation event organised by Mr Rashid at the Park Royal Hotel on 4 September. However we were unable to enter the venue due to an extraordinarily long queue which wove around the hotel car park.

Upon reading the consultation document, it refers to a previous consultation in October 2016. This is the first time we became aware of that consultation. The council received only 78 responses to that consultation, with the majority being from developers and landowners rather than local residents.

This indicates that the council has not met the requirements of Section 18 of the regulations. A local planning authority must notify and invite representation from specified persons, including local residents.

Unsuitable strategic objectives

The implication of the inadequate consultation is that the council has proposed two strategic objectives which are not suitable for the town. We object to the adoption of these objectives, which are:

- W1: The transition of Warrington from a New Town to a New City
- W2: The release of green belt land

The Borough of Warrington sits between two city regions: Liverpool and Manchester. The council's own Landscape Character Assessment (2007) states that the town of Warrington "is located centrally within the Borough and is surrounded by small village settlements and open countryside." It also states that "Warrington sits in an agricultural landscape of great variety". This landscape character, i.e. town, villages and open countryside, is of the utmost importance to us as residents and, we are sure, of many others.

The Landscape Character Assessment should form part of the evidence base for the preparation of Development Plan Documents. However in the Local Plan there is no reference to the impact that the adoption of W1 and W2 would have on the preservation of this landscape character. W1 and W2 imply a significant change of landscape character from town, villages and open countryside to an urban city landscape.

There is also no evidence presented for the support of local residents for the adoption of W1 and W2. Adoption of an objective to significantly change the landscape character should only be contemplated with overwhelming support from residents.

Furthermore, we believe that W2 is incompatible with the National Planning Policy Framework (2012), and more recent government policy stated in the 2017 Housing White Paper. Green Belt boundaries should only be changed in a Local Plan under “exceptional circumstances”. Therefore a local authority should never adopt “release of green belt land” as a strategic objective.

To be clear: we do not support the adoption of W1 and W2. In our view Warrington should not plan to become a city. Instead it should adopt an objective to preserve the town, village and countryside character, acting as an important buffer between the neighbouring city regions of Liverpool and Manchester. We expect, given the numbers attempting to attend the event at the Park Royal, that this view is shared by a large number of residents. That the council has not recognised this in the document reflects on the inadequacy of the consultation process to date.

Inappropriate and unrealistic housing growth plans

The draft plan is based on an assumed need for 24,774 new household properties over the next 20 years. Although it is not made clear in the consultation document it represents a 28% increase on the existing housing stock of 90,000. The scale of this is far in excess of the true underlying housing needs of the borough.

It appears that such housing plans are driven by the council’s desire to transform Warrington from a town into a city. As noted above, there is no evidence to support this desire. It may also be the case that the housing plans have been unduly influenced by developers and landowners, both of whom have a financial interest in promoting housing development, and, due to the inadequate consultation, were the majority of respondents to the previous consultation.

ONS statistics show that total fertility rate in Warrington is 1.85 which indicates a natural preference in the population for declining population. (All other things being equal, a fertility rate of 2 would be needed to sustain the population). In addition, government migration policy is for net migration into the UK to be 100,000 or less. This equates to a per annum increase of 0.15%. Taken together these facts would indicate that over the long term, all new housing need in the borough is driven by two factors: (1) increasing life expectancy leading to an increase in the number of older people in the borough and (2) higher net inward migration into the borough than the UK average.

These factors have not been made clear in consultation. The inward migration into the borough is a policy choice driven by the desire to transform Warrington from a town into a city. The increase in the older population would require a different type of development than proposed in the plan - retirement communities with easy access to amenities, including health care - rather than a garden city in the green belt.

The Office for National Statistics (ONS) make population projections taking into account demographic factors. Over the 20 years to 2037, the ONS projections for Warrington are for an increase of 23,000 people which is 11% of the population. Applying this 11% increase to the existing housing stock gives an increase of 9,900 properties. This is only 495 new houses per year. This represents the true underlying housing need for the borough.

Comparison of the preferred option to the ONS projections reveals the scale and implications of the council's ambition to turn Warrington into a city through migration into the borough. The council's preferred option for 24,774 new houses over 20 years is 2½ times higher than the underlying need from ONS projections. It means that 15,000 additional houses are planned to meet the city aspiration, in excess of the underlying need. If the council did not adopt a strategic objective to become a city there would be no need to release green belt land for development. All needs could be met within the existing urban area, with spare capacity for further future growth. In addition the release of land following decommissioning of Fiddlers Ferry Power Station will provide a substantial buffer for additional growth should it be needed in the future.

The fact that the significantly lower ONS based projections have not been used as a reasonable alternative in the Sustainability Appraisal means that this assessment is fundamentally flawed. Relative to a growth need of 9,900 houses, all scenarios considered in the Sustainability Appraisal would show significant adverse effects on key assessment criteria including Health and Wellbeing, Natural Resources, Flooding, Heritage, Landscape, Biodiversity and Climate Change. Benefits to Economy and Housing of the preferred option, when assessed against local need would be negligible.

Under the Environmental Assessment of Plans and Programmes Regulations 2004 all plans must have an environmental report published for consultation which assesses the likely significant effects of that plan. By failing to publish the environmental report on the consultation section of its website, by failing to present an housing need scenario compatible with ONS projections in its environmental report, by failing to take account of the adverse effects in selecting its preferred option and because of the inadequate consultation process, we are concerned that the council has not complied with this legislation.

Complete lack of evidence to demonstrate exceptional circumstances for release of green belt

According to the National Policy Planning Framework (NPPF), there are five stated purposes of including land within the green belt:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns from merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF also states that Green Belt boundaries should only be changed in a Local Plan under “exceptional circumstances” and only permits most forms of development in “very special circumstances”. In its recent Housing White Paper the government has reaffirmed this policy commitment by stating the following proposal:

Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.

The evidence that we have set out above shows that in the Local Plan, green belt is only needed to meet the council’s aspiration for a new city. The underlying needs of the borough do not require release of green belt. The council’s adoption of a strategic objective does not constitute “exceptional circumstances”. No evidence is presented in the Local Plan which shows “exceptional circumstances”. Indeed, under the NPPF it is clear that the purpose of the green belt is to prevent the kind of development proposed in the local plan. The strategic importance of the Green Belt has been ignored in the plan, and loss of such a significant amount of open space will be detrimental to the whole borough and neighboring areas.

Under Sections 19 of the Planning and Compulsory Purchase Act 2004 the Local Plan must take account of government policy including the NPPF. Paragraph 151 of the NPPF states that “Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework.” By proposing development in existing green belt without evidence of “exceptional circumstances” the council has not complied with this legislation.

Concluding remarks

The Local Plan has significant flaws which require fundamental revision and re-consultation before the plan is taken forwards. As council tax payers we are concerned that unless the plan is revised it could be open to legal challenge which could result in significant expense for the council. At the very least, during the Examination in Public, we are sure that the Planning Inspector will wish to consider these matters in some detail.

We urge the council to prepare a Local Plan which drops the strategic objectives of becoming a city and releasing green belt. Instead the preservation of the local landscape character and meeting the needs of the local population should be strategic objectives. This should include explicit and detailed consideration of the needs of the aging population and resolving current traffic issues.

We would support a Local Plan with development in the town centre and waterfront areas, which with modest development in the wider urban area should be more than adequate to meet the local needs. We cannot support a plan which continues to include the Garden City proposal which would destroy the open countryside character of South East Warrington.

In light of the serious concerns we have raised, we are sending a copy of this representation to the Secretary of State for Communities and Local Government and to the Member of Parliament for Warrington South. Please acknowledge receipt of this representation.

Sincerely,

