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26th September 2017**WBC Preferred Development Option Regulation 18 Consultation July 2017:**

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As a resident of South Warrington for the past [REDACTED] years I am **appalled and outraged** at the proposed **unjustified destruction of the greenbelt** in the South Warrington area, and the **wanton disregard for the South Warrington local communities and way of life**.

Whilst the PDO does contains some elements which make perfect sense in developing a future Warrington that people can be proud of, (namely the much needed town centre redevelopment and the waterfront development - albeit there is very little detail included in the PDO), I wish to express my **wholehearted objection** to the PDO and would like to make the following points regarding the process and content of the PDO specifically relevant to the South Warrington aspects of the proposal:

1. There has **not been a meaningful and robust consultation process** for the PDO. The apparent “consultation events” have been **woefully inadequate, poorly communicated, poorly timed**, and the information given and communicated via council officials has been **contradictory** and in some cases **misleading**. Further evidence can be highlighted in the following key points:
 - (a) **No effort to engage with residents in the initial phases** of the plan development: the PDO document states that the evidence base was formulated from 78 responses to an initial “scope and contents consultation” period in late 2016. This initial period of consultation was not appropriately advertised at the time, with very few residents knowing anything about it. Given the scale of the proposed change to Warrington and especially the Southern areas, the fact that only 78 responses were received from a potential of over 200,000 residents living in Warrington should have warned WBC that few people were aware of the consultation and further engagement was required prior to collating an “evidence base”.
 - (b) **“Evidence base” does not reflect residents’ views**: it appears that the majority of the initial responders were either developers or land owners thus the plan has been property/land speculator led, not community led.
 - (c) **Public have not been consulted with regarding the plan aims, principles, values or proposals for Warrington**: a key for any consultation process is to engage up front with

- the public on the principles of the future plan. It has resulted in the public being put in the position solely as objectors rather than contributors to the plan.
- (d) **No prior-engagement with Parish Councils or residents groups** has been evident: there appears to have been no direct input from the Parish Councils or residents groups to the contents of the plan prior to being published (especially in South Warrington wards). This appears to be a massive oversight and flaw in the consultation process.
- (e) **Lack of publication of consultation events by WBC:** WBC have made no effort to inform the general public of consultation events, this has been left to resident action groups and the local media. Indeed, there is a point of law (*R(BAPIO Action Limited) v Secretary of State for the Home Department [2007] EWCA Civ 1139*) that requires any person who is to be worse off as a result of proposals to be directly contacted by letter or telephone. Given the fact that numerous people in Warrington will “lose out” if these proposals are realised, this omission to directly contact people is a grave error by the Council.
- (f) **Consultation events planned over the summer period:** it is not appropriate given the scale of proposed changes to plan events when many residents are unable to attend due to holidays, etc. The council have a duty of fairness to ensure proper and timely consultation is planned and communicated effectively.
- (g) **PDO document delivered as a *fait accompli*:** the plan has been communicated to the public as something that can only be tinkered with. It has been positioned with many apparent facts and figures which could be deemed as misleading. Indeed, senior WBC officers have already been actively communicating and briefing the plans to other bodies (e.g. Place North West Cheshire Development Forum, 25th Sept 2017) before the plans have even been agreed. Furthermore, the rhetoric coming from some WBC officers during the wider “consultation” events and through private conversations have been seen as vitriolic and “it’s going to happen anyway”. This type of behaviour is unprofessional and undemocratic, but more importantly it is demeaning to those residents whose life’s may potentially be significantly affected by these proposals.
- (h) **No proper data collection at the consultation meetings was evident:** notes of the number and names and addresses of attendees were not taken. Feedback forms were not provided to the attendees to allow an objective feedback review of the meeting to assess their efficacy. Attendees did not see any WBC officer taking any notes of comments made to them. This suggests that the WBC officers were really not interested in feedback from attendees and were only present as a “tick-box” exercise – further demonstrating that the PDO was being communicated as a *fait accompli*.
- (i) The general public **need to be fully informed and have explained clearly** the transparent procedures of public consultation, government guidelines, and WBC policies associated with the PDO. They require knowledge of how the consultations and contributions will be

independently assessed for the benefit of all residents in Warrington. This has not been achieved by WBC.

2. **No disclosure of interests in the PDO.** The non-transparency and non-accountability of the document I find particularly worrying. A full disclosure of interests from all parties (e.g. councillors, corporates, non-corporates and decision makers) should have been made in the document, if for no other reason than to avoid speculation, suspicion and rumour which is now rife in the area.
3. **Loss of Greenbelt is unacceptable and not justifiable within the PDO:** The National Planning Policy Framework (NPPF) Section 9, clauses 79-83 states that “*green belt boundaries should not be altered unless by ‘exceptional circumstances’*”. The PDO does not demonstrate nor detail the argument for ‘exceptional circumstances’ as alternative options of brownfield sites were available and not explored in detail. For example, the call for sites process identified several other potentially developable urban sites in the North and East of Warrington which were not considered for inclusion in the preferred option (section 4.61). The details of why they were not included and who made the decision to exclude them were not evident in the PDO.

Moreover, the **Green Belt satisfied the tests of durability** when it was designated and WBC has presented no exceptional circumstances to justify a change.

In addition, the Government's current White Paper (“How to fix our broken housing market”) further gives guidance to authorities stating they should “only amend Green Belt boundaries when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements” (Annex clause A.61) including;

- (i) “*making effective use of suitable brownfield sites and the opportunities offered by estate regeneration*” – **the PDO does not demonstrate that all brownfield sites have been fully assessed or explored.**
- (ii) “*the potential offered by land which is currently underused, including surplus public sector land where appropriate*” – **the PDO does not show that this potential has been explored and exhausted.**
- (iii) “*optimised the proposed density of development*” - the density of developments has not been assessed or optimised in the PDO. The PDO uses a housing density of 30 dwellings per hectare throughout the document. Achieving a **higher density of dwellings/hectare in the town centre** (such as apartments/flats/etc) could mean less or even none of the greenbelt is required to meet future housing requirements. This would also have the advantage of enabling a different mix of housing to be built elsewhere (e.g. bungalows being built for the elderly). Proposing a higher density of housing in the town centre would match the desire for many new home buyers for

housing without gardens, close to the town centre for social life and close to public transport hubs to avoid needing cars.

- (iv) *“exploring whether other authorities can help to meet some of the identified development requirement” – this has not been exhausted or assessed sufficiently in the plan.*

The proposal of a Garden City Suburb in South Warrington has horrified almost every resident who currently resides in the area. The smaller villages such as Appleton Thorn, Stretton and Grappenhall Village which are currently separated from one another by green fields will be completely engulfed by new residential developments if the current proposals were to be realised. This will completely change the character of the area and **destroy its history and heritage forever**. In addition, the ability to access and enjoy the green space in South Warrington (often called the “lungs of Warrington”) is an amenity in itself and its loss will be to the detriment of all Warrington residents not just a loss to those who live in the area.

4. The **ARUP Green Belt review document is fundamentally flawed** but has been used as a reference guide and justification to propose green belt in the South Warrington area be built on in preference to other areas in Warrington. The report should be set aside and revisited before any further development of the PDO. The following issues are supporting evidence that the report has fundamental flaws:

- (i) The 2016 report is unsigned and its quality assurance verification is not available for assessment. This together with the fact that WBC commissioned the report **questions its validity and objectivity**.
- (ii) The fact that its title sheet states *“is not intended for or should not be relied upon by any 3rd party...”* does **question the use of the document** by WBC to support the local plan decisions.
- (iii) The scoring system **methodology does not appear accountable or transparent**, which raises a number of questions: who were the assessors; where are they employed; how many participated; who were they accountable to; what their qualifications were; etc.
- (iv) The **Landscape Institute methodology** for assessing landscape character (LVIA) is commonly accepted as the industry standard and has been tested at many public enquiries. This part of the planning process is **missing** in assessing the greenbelt functionality.
- (v) There are **inconsistencies in the report**, e.g. the General Assessment for Area 10 (South East Warrington) is deemed “weak”, whereas the Parcels Assessment for the same area and criteria is at worst “moderate” (8 weak, 12 moderate, 7 strong).

- (vi) The **Assessment process appears to be incomplete**, in so far as the vital loop-back part of reassessing the status of General Area 10 after the Parcels Assessment has been completed is not made, leading to false conclusions. This is a fundamental omission, as the grading of Area 10 is “weak” and this has greatly influenced the outcome of the plan. Had the process been completed correctly, it is difficult to see how Area 10 would remain “weak”.
5. Assumptions on **future housing needs are unrealistic** and driving the need to build on Green Belt land. In the PDO, WBC have stated that 1113 dwellings/year is the requirement of housing to meet the future growth aspiration of the town, they also reference the forthcoming Government consultation on calculating housing needs for local authorities. This consultation has now been published and there is a clear gap between WBC aspirations and the government calculation of 955 dwellings/year. This calculated reduction in housing need has a clear impact on the PDO and the decision to destroy greenbelt in South Warrington. Furthermore, the WBC preferred option 2, is predicated on the aspiration of the council executive to create a “new city”, it is not an independent, objective and expertly assessed *need* of the town.

The process needs to be halted until a definitive housing need figure is agreed by all parties and the justification for any uplift over and above the new methodology is fully understood and evidenced.

In addition to the points above, I would also like to highlight several other areas where the PDO document falls short of expectations and requirements that would demonstrate that a fully thought through and objective process has been followed:

6. **Unknown Strategic Road Network impact:** the proposals for the highways in the PDO have not been properly tested to determine their effects on the Strategic Road Network. This is contrary to the Highway Agency’s stated requirement and as such could render the plan undeliverable.
7. **Unknown Local Road Network impact:** the local highway proposals in the PDO have not been tested to determine the effects on their capacity to carry the required traffic loading, neither do they assess the resultant impact on the Strategic Road Network. This again runs contrary to the Highway Agency’s stated requirement and again could render the plan undeliverable.
8. **Unknown Public Transport impact:** a multimodal transport assessment has not been carried out by WBC to ascertain the plan is deliverable from the perspective of strategic bus routes.
9. There has been **no impact assessment** of the PDO on **Stockton Heath**. This is an obvious oversight and must be redressed before any further continuation of the PDO process. The impact on Stockton Heath, as a village centre and social hub for the South Warrington area, is hugely detrimental to its residents in terms of their health and well being. The additional traffic

alone, on an already over capacity road network, will result in frequent grid-locks and pollution issues.

10. **Unknown Ecological Impact:** no high level ecological impact assessment has been conducted to support the PDO proposals. A wide variety of fauna and flora exist in the current South Warrington Greenbelt areas and not to have conducted an initial assessment on the impact of Green Belt loss is unforgiveable and indeed unacceptable. It supports the view from the UK National Ecosystem Assessment (NEA) in that nature is consistently undervalued in the decision making process. Biodiversity is key to the survival of life on earth. Its loss deprives future generations of irreplaceable genetic information and compromises sustainability. This is a clear failing in the PDO and demonstrates the short-sighted nature of the proposals with regards to the local ecology and sustainability.
11. **Unknown Environmental Impact:** no high level environmental impact assessment has been conducted to support the PDO proposals. In May 2016, the World Health Organisation reported that Warrington was the second worst place in the North West for breaching air pollution safety levels. Given that the increase of 24,000 dwellings and new employment areas will bring an additional 50,000+ vehicles into the area, there is nothing in the proposals to demonstrate how to mitigate future air pollution issues. This would also increase the workload and impact on local health services. This is a clear failing in the PDO and another demonstration of its lack of sustainability understanding and awareness.
12. **Unknown Local Health Services impact:** no assessment has been conducted to understand the impact an increasing population would have on local health services. They are already stretched with the Warrington hospital at capacity and local GP clinics and health centres over-capacity and understaffed. This is a clear failing in the PDO.
13. **Lack of Equality:** South Warrington is disproportionately impacted and affected by the PDO. North and Eastern Warrington are barely touched by the proposals. There are no clear objective reasons for this given in the PDO.

In conclusion, the specific proposals for South Warrington are not justifiable given the information available at this time. These proposals are being published, and decisions are being made without meaningful engagement and consultation with all Warrington residents, all Parish Councils and all other interested parties. These decisions will have a significant deleterious effect on the health and well-being of all residents in the South Warrington area, they are not being considered in a robust, objective and transparent manner. Nor is the process being conducted with the proper due diligence or duty of fairness to its residents.

There are clear anomalies and questions that require consideration and rethinking regarding the objectivity of the PDO, the proposed destruction of the Green Belt, the assessment methodology being used, the lack of the appropriate assessments, surveys, impact and testing analysis and the unrealistic housing aspirations of WBC compared to new Government guidelines on calculating local authority housing needs. Therefore, the **WBC has failed to demonstrate that the PDO is deliverable.**

Finally, this current PDO process needs to be stopped immediately and a proper and meaningful consultation set up with local residents, Parish Councils and other interested parties in order to establish a more robust and realistic future plan for Warrington as a whole. Any new plan should meet the aspirations and hopes of all Warrington communities and businesses and satisfy the growth needs for the area, but over-and-above that, it needs to safeguard the Green Belt for future generations.

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