

27th. September 2017

Objections to:
WARRINGTON PREFERRED LOCAL DEVELOPMENT PLAN 2017

I would like to register my strong objection to the whole of the Warrington Preferred Local Development Plan 2017 and would like the whole document to be refused and the whole process started again. The values and assumptions on which the PLDP appears to be based, in my view, are fundamentally flawed. My concerns are so fundamental that the proposals cannot be tinkered with or particular details modified such that any part of the plan is acceptable.

The PLDP is a typical product of the seismic shift in values underpinning the British planning regime since the original Garden City Movement of the early C20th. Recently, the British planning regime has seriously degenerated since the introduction of the National Planning Policy Framework on 27 March 2012 as a result of lobbying by the volume house-builders. Despite its announced intention to encourage 'sustainable development' and community involvement, its real intent was to open the flood-gates for rampant house-building and urban sprawl to kick-start a moribund economy based upon an increased debt burden.

The summary of my principal issues of objection are :

- 1) Housing: Increase in urban sprawl: Land + property speculation led plan based upon assumptions and data which cannot be firmly substantiated (see below)
- 2) Significant loss of Greenbelt, landscape, ancient woodland, woodland rural character. The NPPF Para 17 states that planning should " take account of the different roles and character of different areas, promoting the vitality of our main urban areas, **protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it**"
- 3) Loss, destruction and / or alteration of heritage assets in all Warrington and local village character and architectural distinctiveness e.g. listed buildings, ancient monuments, ancient woodland. The NPPF states that: "Local planning authorities should set out in their Local Plan a **positive strategy** for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance." The PLDP 2017 has not proposed any detailed "positive strategy" except except as a passing good intention (Para. 4.38: W5). This is a huge omission.
- 4) Lack of a detailed plan to preserve and enhance the urban quality of north Warrington which is shown as being divided into 'development parcels' (Fig 4: 'City Centre'). (see Issue 3 above)
- 5) Traffic congestion / transportation will result in intensive and destructive road works throughout ALL Warrington both north + south. Latchford and the listed bridges and underpass along the Bridgewater Canal will be under very severe threat of road widening, alteration, demolition. Important heritage assets which contribute to local character could disappear under the pressure of severe traffic congestion.
- 6) Rural lane of south Warrington character of south Warrington under threat.
- 7) Poor consultation: residents not contributing to the principles of the PLDP. The NPPF does not provide any guidance as to the efficacy and veracity of any public consultation. (see detail below)
- 8) The PLDP 2017 is about quantity NOT quality (e.g. improving quality of urban environment in built Warrington.)

- **Preamble to significant objections:**

The Warrington Preferred Local Development Plan 2017

Local Plan review and the Council's initial Local Plan 'evidence base' was formulated between 24th October and 5th December 2016 with an input of 78 responses mainly from developers and landowners as a trawl for land. Other responses were also received from Parish Councils, local residents and other stakeholders. This indicates that the plan is property / land speculator led and NOT community led from Warrington's citizens + ratepayers. Its prime purpose indicates land speculation; not environmental quality or community led.

The PLDP document is an imbalanced report in that whilst it says much about south Warrington 'development', it says virtually nothing about how it intends to improve and enhance the urban environment in north Warrington (including the town centre) which has significantly deteriorated over the years – a top priority. Any Local Plan should focus on improving quality, bringing the town's communities together and not accommodating urban sprawl

- **Quality of Consultation + Information:**

NPPF: Para 17: that planning should be be genuinely plan-led, **empowering local people to shape their surroundings**, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.

- Thus local people have not been empowered in the **framing of any plan aims, principles, values or proposals for Warrington**. The public have been put in the negative position solely as objectors rather than as positive contributors to the purposes and aims of the plan.

- The PLDP document is a lengthy report expressed in technical planning terms and acronyms such that it is difficult for the ordinary public to fully comprehend the significance and planning legality of the many details. e.g. housing 'targets'.

- Warringtonians need to be fully informed as to the precise and transparent procedures of public consultation, government guidance on this issue, WBC policies and as to how and by whom the consultations, comments and contributions will be independently assessed for the benefit the quality of life and urban environment for citizens. Decisions and discussions associated with the PLDP need to be taken in full public view and not behind closed doors.

In objections to and comments on planning applications and documents such as the PLDP, there is a huge democratic deficit and imbalance of power between the local planning authority, property applicants and interested third parties. The objecting public have no 'third party' rights to be heard or considered unless they possess leverage in having substantive knowledge of planning legislation, procedure and guidance. Professional planning advice and advocacy from barristers cost ! The ordinary people of Warrington have neither time nor money to spend in understanding what are 'material considerations', valid objections etc. The NPPF is totally silent as to how due weight and consideration might be applied to having regard to objections. Since citizens pay for the planning service through rates and taxes, the local planning authority should be duty bound to inform objectors of their full rights and informed as how they might effectively object and comment. The current planning regime is wholly balanced in favour of land and property speculators with deep pockets to pay for eloquent planning barristers.

"If a consultation exercise is to take place over a period when consultees are less able to respond, e.g. over a the summer of Christmas break, or if the policy under consideration is particularly complex, consideration should be given to the feasibility of allowing a longer period for the consultation" (*Landmark Chambers: Sept. 2013: Halebank PC v Halton BC*)

- **Statement of Disclosure of Interests:**
In the name of democracy, transparency and accountability, it would be useful if Warringtonians were informed of the identity of property speculators, land + property owners, financial + corporate bodies and other vested interests who would + are most likely to benefit financially from the proposals of PLDP. This should include councillors, corporate and non-corporate functionaries and decision makers. Councillors and officers should disclose any positions, relationships and meetings, both informal and formal, which they have with any person or organisations likely to benefit in any way from the proposals in the PLDP.

- **'Evidence' quoted in the PLDP:**

- The plan's 'evidence' justification is by commercial/business consultancies such as the globalist oriented Oxford Economics and credit rating Experian thus indicating that the plan is a business venture without a substantiated social and environmental basis.
- The 'evidence' base and assumptions of the plan are difficult to access for interrogation by the ordinary public.

- **Warrington is a community town and should not be a city:**

- The proposal for Warrington to become a city has all the hallmarks of a Warrington Borough Council vanity project. There are already three cities within 20 miles of Warrington ! Moreover, such a status would destroy Warrington's essential historic urban character and threaten its green environs both north and south. Even in its current sad urban state, people who live in and around Warrington really identify with it and its history: and feel passionately about it. City 'status' (if you can call it that) would obliterate all that.

In these contemporary times, people desire a beautiful, calm and pleasant place to live with a pleasant view from their windows. That is why people with aspirations and who are able move from the tawdry cities and towns to the countryside, villages, cathedral towns and even abroad. There is an acute malaise in Britain concerning the increasing uglification and cloning of our towns at the hands of distant, un-feeling government, ambitious planners, egotistical architects and politicians.

In the latest edition of *The Buildings of England: Lancashire: Liverpool and the South-West* by Richard Pollard and Nikolaus Pevsner: (ISBN 0-300-10910-5) which was launched in Warrington Town Hall on Thursday, 1st June 2006 it was stated that:

"The Borough was responsible for redeveloping the town centre to cope with this (population) increase, with inner relief roads and new shopping centre. This has been at the expense of much of the older architecture of the town: over half of the 52no* buildings listed by 1968 have been demolished and other exist only as facades. **This has done much to destroy the pleasant Georgian character** noted by Peter Fleetwood-Hesketh as recently as 1955." (p.603) (* a very high number for 1968)

This is a severe indictment of the attitudes of those responsible for the care of historic Warrington during the late twentieth century which appear to be continuing apace to this very day. The people of Warrington do not want its precious remaining architectural and urban history obliterated by city status pretensions.

- **Historic Warrington: Local distinctiveness + urban quality**

- The PLDP is about quantity and NOT quality for Warrington as an integrated very historic town. It hardly refers to Warrington north of the Manchester Ship Canal where quality of urban design, street-scape and open space should be top priority. The town and inner urban areas are in dire need of very high quality urban enhancement which respects Warrington's unique historic architectural quality. Over the years, development control, enforcement and highway works have done little to improve the quality and attractiveness of Warrington. The quality of the town centre should create pride and identity with Warrington.
- The PLDP. Para.4.38:W5 claims to 'secure high quality design and re-inforce character and local distinctiveness....'. However, WBC has had difficulty in demonstrating

sufficiently this ambition. The quality of the new gargantuan constructions in the town centre and of development control and enforcement have not harmonised with the traditional historic character and scale + fine urban grain of the town centre. e.g. Shed shops along Winwick Road + in Cockhedge, poor shop fronts e.g. Bridge Street, Dial Street, Church Street, Orford Lane, Lovely Lane, Padgate Lane, Latchford Village, Stockton Heath Conservation Area, etc. The new mega-structures in the town centre are destroying the traditional roof-scape, skyline and intimate urban grain of the historic town and have not contributed to local distinctiveness and attractiveness. Importantly, there are NO existing or proposed conservation areas indicated on Fig 4 'City Centre'.

- Fig 4 'City Centre' indicates land-uses on numbered development parcels. Such a notation indicates that WCB views the town centre as 'speculative property development' parcels.
- City status will put pressure on Warrington Town Centre to demolish even more of Warrington's unique architectural heritage and replace it with anodyne, characterless and clone-town buildings

Warrington is becoming a Mall Town in which property speculators now own extensive tracts of central Warrington including streets formerly in the public realm. Warrington town centre increasingly does not belong to Warrington. (see Google Earth)

There is a question to be asked as to commitment to urban conservation e.g. partial demolition of buildings contiguous with the Water Tower + furniture works. WBC does not have a dedicated Conservation Officer at Principal Officer level i.e. where it really counts. The formal post of Senior Conservation Officer was deleted some years ago

- Environmental Impact analysis is prominent by its paucity.

The Housing Component:

- The justification for the huge housing numbers and footprint appears to be based on questionable assessment of 'needs' (see Appendix 1) prepared by Mr Stephen Goulding. Importantly, WBC should be considering the absolute minimum housing growth for Warrington defined by environmental and a truly sustainable local economy.
 - Demographic projections are, by nature, suspect and often based on assumptions which are difficult to substantiate. Clearly WBC have used these inflated projections to buttress the claim for city status. And, as Appendix 1 argues, Brexit should be taken into consideration.
 - In *Immigration, housing and metro-mayors*, Brian Green (RIBA Journal, July 2017 pp 48-49) states that the Office for National Statistics "expects population expansion in Cambridge and Peterborough and the West of England areas to be well above the national average" (i.e. not the North West) and "about half the projected growth in the population of England over the next ten years is expected to come from net inward international migration Tough curbs would slash this projection, ...". "This could have a profound impact on the demand for housing...." "In Manchester and Liverpool, the vast majority of growth in the population has come from non-UK born people"..."but without an influx of immigrants the pressure to build more homes may fall away quite markedly" .i.e. in North West England which includes Warrington.
 - Thus the housing projections in the Warrington PLDP need to be much more circumspect and erring towards conservative estimates. From the demographic observations above, it is clear that the housing 'wants' are not 'needs' and that the North West housing market is substantially driven by immigration which Brexit seeks to curb and control.
 - Thus, the housing 'demands' for the PLDP are predicated on rather dubious assumptions and thus should be scrapped. Any alternative plan should be for no more than two five year phases owing to the very fluid circumstances and, at least, not before the actual impact of Brexit. Furthermore, Migration Watch UK estimates that net migration plus births to foreign born parents has accounted for 85% of UK population growth since 2000. It is clear that the volume house builders depend substantially on inward migration.
 - (See also Appendix 1 below)

- **The Landscape Setting of Warrington:**

The Green Belt, Warrington landscape and villages

In the National Planning Policy Framework (NPPF), **Chapter 9** it states:

“Protecting Green Belt land

79 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes

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

83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, **Green Belt boundaries should only be altered in exceptional circumstances**, through the preparation or review of the Local Plan.

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt.”

Exceptions to this do NOT include housing advocated and promoted by land and property speculators !:

In a letter (25.08.2017) to its members, CPRE Cheshire make the following strong and valid concerns (not all are listed below):

- a) A proposal for 9,000 houses in Greenbelt in one authority cannot be sustainable
- b) This land is not 'spare' but supports existing farms and rural businesses
- c) Given Brexit and climate change, it is short sighted to build on agricultural land whether Greenbelt or not
- d) The important issue of gaps between settlements cannot be considered without showing the plans and ambitions of neighbouring authorities. Warrington should not be joined to Halton, St. Helens, Greater Manchester (particularly Wigan and Salford) and the Cheshire towns and settlements to the South
- e) Severe limits of the roads and motorways around Warrington which are now not fit for purpose being frequently congested. The situation will be exacerbated by the proposed/approved logistics/employment sites to the North along the M6 (and to the M6/M56 junction: *my insertion*): There will be vehicles coming to Warrington to avoid the two Mersey toll bridges thereby increasing motorway congestion AND local roads.
- f) It is disappointing that we are likely to have a spiral of alternatively matching land to employment land and employment land to housing.
- g) Minerals and Waste policies should consider the large amount of land-fill in the Warrington area in the past, its damaging impact on the town and the opposition of residents to further landfill.

(Is Warrington going to continue as the Great Dump of the North West ???)

Thus, I object very strongly to building on both green belt, green land and agricultural land. WBC should abide by the government guidance in the NPPF to protect and safeguard the green environs of Warrington.

- **Traffic + Transportation:** (not fully addressed in the PLDP e.g. Fig 10)

Details of the huge traffic / transport implications for Warrington have been omitted from the PLDP because no detailed traffic computer models appear to have been tested for the road network. The implications for south Warrington, north Warrington and, in focus, **Latchford** and **west Thelwall** are potentially disastrous. Existing roads and routes will experience increased traffic congestion and pollution e.g. noise. This is a crucial component without which the plan cannot be fully assessed.

- On Monday 4th September 2017 (pm) at Park Royal exhibition, Mr Farrell informed us that no detailed transportation / traffic model had been prepared for the proposals, but was commencing. Thus:
- There is no detailed transportation / traffic / road infrastructure chapter in the report (see Contents) nor evidence of any computer modelling and analysis of the environmental, road widening or social impact of this 'development' plan throughout the borough.
- Any traffic modelling for Warrington and its sub-region should take as its basis the existing physical capacity and quality of environment of the roads such that there will be **NO** congestion, road widening, road works, widening of existing bridges. In other, words, **the existing roads, streets, lanes, bridges and junctions in Warrington should set the absolute limit to existing traffic flows and traffic capacity AND to any increase in the urban foot-print of Warrington.**
- Without such a restricted urban capacity based plan, residents, councillors and decision makers will not be able to assess the PLDP because of such an important omission ? (Fig 10 is wholly inadequate) Any proposed traffic model based on environmental and social parameters should be analysed and assessed by independent consultants.

(For the effect on Warrington's roads, the proposed plan is like adding extra large size + number of radiators to an existing 15mm pipe work in a central heating system i.e. there are limits to expansion of the network without extensive re-modelling: i.e. wider pipes = wider roads)

- The new housing population will create even more intense traffic congestion and pollution throughout the town thereby negating any benefit which might accrue from the proposed western by-pass to the town centre.
- The draft proposals for Warrington would require more disruptive road widening and engineering works to accommodate increased traffic: For example, the north – south traffic movement will considerably increase the current significant pressure on the rural lanes of south Warrington and on protected Heritage Assets on the Bridgewater Canal which will most likely 'require' their demolition or significant alteration: The threat to the rural landscape, heritage assets and lanes of south Warrington will be hugely destructive:
- **NB:** Traffic models can be manipulated by altering algorithms, data weighting, land use allocation (e.g. employment, shopping, housing densities, road assigning and other variables.)

ROADS + LANES affecting Heritage Assets (Listed Structures + Monuments)

- (single lane choke points and narrow lanes under pressure for demolition / widening)
- **Lumb Brook Road Under-Pass: Ancient Monument (Single Lane Traffic)**
- Will this require the demolition of Lumb Brook Bridge + Bethesda Chapel ?
- **Red Lane Bridge: (Single Lane Traffic): Listed Building: Grade II:**
Currently a 'Rat Run' from **Quarry Lane** and **Windmill Lane** which would increase by its cross-road connection to **Lyons Lane** all of which will function as a major traffic artery by its eastward connection to the new urban highway serving the urban sprawl.
- **Hough Lane Bridge: (single lane traffic)** The increase in housing along Hough Lane will exert pressure to widen + demolish.
- **Walton Bridge: (single lane traffic)** very similar to Hough Lane.

The **Bridgwater Canal** and the Manchester Ship Canal are a considerable impediment to north – south traffic movement.

ROADS, LANES + PLACES likely to be affected by severe traffic congestion:

Latchford Village + Knutsford Road: High level arterial road with extensive bridgeworks + slip lanes to take major traffic load of north south traffic (see Fig 10). **Latchford Village** is already a traffic island ! Importantly, Figure 7 indicates a sweeping major north – south arterial road along the high - level railway alignment which ends up in **Latchford**. Also significantly affects south **Thelwall** (Does this arterial road connect to **Bridge Foot** via Knutsford Road ?)

Stockton Heath Village will experience significant increase in traffic from **both Knutsford Road, Grappenhall** which are identified as a major artery via **Ackers Road** and **Grappenhall Road** the canal-side section of which will be a rat – run to **Stockton Heath**)

London Road via Stockton Heath will be experience even more Traffic **Walton Road** (as an extension of **Grappenhall Road**) will also experience increase in traffic as it connects the above roads to the Stag Pub Junction for the proposed Western bypass to **Liverpool Road**.

Red Lane / Windmill Lane / Quarry Lane / west end of Whitefield Road, Hill Cliffe Road will become even more of a rat – run owing to its cross – road connection with **Lyons Lane**.

Lumb Brook Road and **Bridge Lane** are defined as major arteries to connect with the newly opened (now closed) **Stockton Lane**. These three roads will converge at **Lumb Brook Bridge**.

Grappenhall Hump Back Bridge will also experience significant pressure

Latest:

Now that the **Red Route** for the **Western Bypass** has been selected, even more traffic volumes + congestion can be expected along **Knutsford Road, Ackers Road, Grappenhall Road** (along its whole length) via **Walton Road** to the new **Stag Pub Junction** as the short circuit route for traffic coming from **Grappenhall** and beyond aiming for north-west and central Warrington.

This traffic has the potential to reach **pre-M56** levels.

WBC are likely to advocate extensive road-works in the town on the basis of the proposed urban sprawl. Road works are primarily controlled by highways authorities, not planning authorities and legislation. There is the danger that the road-works will go ahead regardless.

- No evidence of bus companies and operators appear to have been consulted or that public transport has been part of the integral infrastructure (difficult with low density housing)
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- Because of the southern location of housing adjacent to the M56, the incoming 'residents' are most likely not be employed in Warrington per se and will not identify with the town; they will use the M56 + M62 to work elsewhere. The proposed extensive warehousing is unlikely to provide substantive employment for the incoming local professional classes.
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- The so called Green City southern suburbs of Warrington will merely function as suburbs to Liverpool, Manchester and Chester. They will essentially function as rate – income sources for WBC.
- **The existing roads and lanes should contribute to defining the absolute limits to urban 'growth'**. There should be no more urban growth and 'development' around all Warrington in order to preserve and protect its green environs, rural character + setting

Query:

- Will land + property speculators, who will profit from this urban sprawl pay, for the infrastructure, associated road-works and environmental enhancement and up-grades required by this very destructive local plan from which they appear to be the prime beneficiaries ?

Thus for all the above reasons, it is clear that WBC have produced a flawed and destructive plan based on inadequate principles, values, assessments and data. Such a plan, being destructive of the town, its green environs, its historic assets and essential character, is not amenable to the concerned citizens of Warrington and, therefore, should be scrapped in its entirety.



Appendix 1:

The following are points of objection (via Facebook) by [REDACTED] who is obviously exceedingly well informed and expert on housing 'needs' and employment. He has given permission to "highlight some the challenges below".

Objecting to the Preferred Development Option 2017

The principal reasons for objecting to the PDO are:

1. The flawed vision for making Warrington a city
2. The inadequacy of the Consultation process
3. The miscalculation of the Housing needs
4. The lack of exceptional circumstances for reclassifying the Green Belt
5. Or...the wrong plan for the wrong number of the wrong type of homes in the wrong places!!!

Apart from the poor communication and engagement with residents, the Council officers have failed to carry out the necessary ecological, transport and air quality surveys that would have informed a robust and sustainable plan.

The Inadequacy of Consultation Process

- The consultation process has been not only inadequate and badly communicated, but driven by an unjustified end point – the residents of Warrington do not want to live in a city, but they do want a vibrant and usable town centre and a fit for purpose transport infrastructure.
- WBC should have learned from earlier consultation stages and, rather than invite the easy building over the Green Belt, evolved a constrained development option driven solely by the innovative regeneration of brown-field sites to meet anticipated demographically required housing needs.
- The Green Belt satisfied the tests of durability when it was designated and WBC have presented no exceptional circumstances to justify a change.
- There is no evidence beyond an incorrect and inadequate financial model to support deliverability of even just the demographically required future housing needs.
- With its investment in Redwood Bank there is a suspicion that WBC are going to subsidise developers and are not independent to the process.
- The residents of the borough deserve a higher standard of disclosure and transparency than has been shown to date if WBC is to regain the support of the electorate.
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The new homes and employment land needed in Warrington

The PDO document is very technical and references certain key numbers as given "fact" without direct links to the source material or considering alternative calculations.

The Objectively Assessed Needs (OAN) is cited on p.5 of the PDO as 839 new homes per annum - but this was based on 2012 surveys. Before publishing the PDO, WBC were in possession of an updated May 2017 report based on 2014 data which shows a comparable figure of just 738 homes per year (but could be as low as 679 homes pa), but this number has been ignored.

As the 839 is taken as the base for the higher Economic Development Needs Assessment (EDNA), then if the 839 is a significant overstatement, so must be the EDNA.

The lower number is more consistent with the 716 homes pa average until 2039 within the latest ONS live tables which could be used to underpin the Government's proposed formula for calculating OAN published in September 2017.

Thus:

- The PDO should have been prepared on the basis of the May 2017 addendum (or at very least stated at outset that it was based on out-of-date estimates that had subsequently been shown to be significant overstatements).
- There is no recognition of alternative assumptions and so the broad range of potential outcomes, particularly those with much lower housing requirements.
- The legal challenge to the previously adopted Local Development Plan was premised on the plan not properly reflecting the OAN and affordable housing requirement.
- However the PDO is stated to be "Option 2" – this is based on the aspiration of the Council executive to create a "new city", it is not the independent, objective and expertly assessed *need* of the town.
- The data used by the officers to derive the housing need is highly sensitive to the interrelationship between employment, population demographics and dwelling occupancy. The particular assumptions used appear to have been selected to justify a higher housing requirement significantly above the OAN and do not appear logical, consistent or robust.
- Option 2 is based on an excess employment and economic growth outlook that is based on very high level assumptions and considerations completely outside the control or influence of WBC, and ignore the competing aspirations of adjacent and further afield boroughs and housing areas.
- All the economic initiatives highlighted under the EDNA such as Cheshire devolution and HS2/HS3 will, if they ever come to fruition, be needed just to provide jobs for the natural increase in the population, they are not a justification for even more housing.
- The projections used are based on data periods prior to the Brexit referendum. The Plan should be based on an updated Strategic Housing Market Assessment that takes account of latest economic, demographic and migratory expectations.
- In addition, the housing requirement should be based on a calculation of OAN that is consistent with the methodology and data underpinning the Government's September 2017 proposals for a nationally consistent approach.
- Any higher levels of development should be clearly and separately identified as excess to Needs and so subject to a much higher standard of justification and challenge.
- There appears no specific consideration of how technology will impact lifestyles and working practices, an issue not unique to Warrington. Unless and until there is a proper understanding of future employment nature and density, it is almost impossible to define what employment land is required, let alone where it should be.
- There is no Government requirement to produce a twenty-year plan even if long-term ONS statistics exist.
- WBC should produce a ten year plan, by which point we will be much clearer of the economic and migratory impacts of Brexit, the impact from any completed national infrastructure initiatives and what the consequences of technological change have been on work and home life (and balance). It would also allow for the decommissioning of Fiddlers Ferry and so the availability of an enormous brown-field site requiring regeneration.