



27.09.17

Dear whom it may concern,

I wish to object to the current Preferred Development Option for the following reasons:

- **Concerns over calculation of land needed for new housing and employment over the next 20 years.**
 - We want to challenge the 'Objectively Assessed Need' (OAN) figure in the recent Strategic Housing Market Assessment.
 - We suggest that Warrington Borough Council should review the figures calculated from the SHMA In light of the Government's consultation and proposed new method
 - The new methodology requires a consistent approach across local authorities based on a formula that takes account of government household projections and housing affordability ratios.
 - Volume of housing projected in the plan currently exceeds that of the government target – are these aspirations deliverable and realistic?
 - Housing completions in Warrington over the last 10 years have generally been in the range of 500-700. The new local plan proposes a housing figure of 1,113 dwellings per year.
 - Does the Local Plan demonstrate that the jobs and infrastructure, can and will be provided to support the proposed housing figure?
 - On what grounds are these increases justified? We understand that Warrington has strong economic growth aspirations but how will these be realised?
 - In light of economic uncertainty following Brexit are these projections still relevant?
 - We request that an updated evidence paper should be prepared in light of the new methodology using the proposed formula in the consultation document. Indeed Paragraph 2.10 of the Warrington consultation document acknowledges Warrington's housing needs are reviewed in line with Government recommendations. We want this review to happen before the Local Plan progresses any further.
 - We request transparency on the Council's duty to cooperate with neighbouring authorities. Many residents in South Warrington commute to workplaces outside of the town so arguably the housing need could/may be met elsewhere e.g. Cheshire East, Trafford, St Helens, Halton etc.

- **Concerns over release of land from the Green Belt**
 - It is proposed that significant amounts of Greenbelt will be lost if the preferred option goes ahead.
 - The overall housing need figure needs to be reviewed due to the Government's consultation. If less housing is needed, or different types of dwelling are needed, the overall housing figure could be reduced, and thus loss of Green Belt can be mitigated.
 - Planning Policy advocates a Town Centres First approach to development. The local authority should seek to first develop in urban areas and brownfield land, with Green Belt only being released under exceptional circumstances.
 - There is enough Brownfield land in the area to build 15,000 houses. Once housing need is reviewed this could be sufficient to meet reduced housing requirement, therefore allowing the council to protect and preserve Green Belt land.
 - Large proportion of the proposed house building to be located in the least densely populated and more expensive areas of the town. Density projections are relatively low and affordability likely to be an issue. Do these proposed dwellings take account of societal changes e.g. increase in single person living, aging population etc?
 - How will the Council protect existing neighbourhoods and villages?

- **Concerns over proposal for preferred development option of Warrington Garden City Suburb**
 - Is this really deliverable and have the infrastructure needs been properly assessed.
 - Have transport impacts been properly assessed? Where is the transport modelling which supports these proposals?
 - At the consultation meeting in Lymm we were advised this is currently underway. We request full transparency and disclosure in respect to transport modelling, especially in respect to provision of new strategic link roads.
 - The supporting documents' webpage lists 'Warrington Transport Summary 2017' however this is just a broad overview of issues in Warrington. Where is the detailed consideration of the impact of the Garden City Suburb and infrastructure that will be needed to mitigate its transport impacts.
 - The Local Plan and concept documents use the word 'sustainable' many times. Yet there doesn't appear to be any demonstration of how sustainable development will be ensured. For example there doesn't appear to be a strong commitment to public/active transport.
 - Calls for sites map on page 11 of the concept document – coverage appears to be patchy. Does the council have confirmation from landowners of other parcels of land that they will be made available?
 - Is a holistic approach to master planning evident? Or will we end up with a piecemeal development that fails to deliver infrastructure?
 - Grappenhall Heys development was severely criticised in the Urban Task Force reports for this very issue.
 - Where is the up to date Strategic Flood Risk Assessment on the supporting documents page? There are a number of main rivers in the area.
 - Has the Environment Agency been involved in preparation of the concept document?
 - For completeness the topography and watercourse map on p18 of concept doc should also show Flood Zone 2 and areas a risk of surface water flooding.

- **Concerns over the consultation process**
 - Many residents only became aware of the Local Plan and preferred development option following grassroots local residents campaign
 - Lack of advertising, holiday period, not held in are affecting local residents
 - Inconsistent information provided across meetings
 - Public consultations being held prior to the infrastructure feasibility study results being completed and published. Council representatives have been unable to answer whether the feasibility study is taking place on all 5 reported options or just the preferred development option.

- **Concerns over funding**
 - No details on funding routes for infrastructure requirements which will be significant
 - No details on funding routes for schools and health care provisions

Kind Regards

