

PREFERRED DEVELOPMENT OPTION CONSULTATION RESPONSE

Having reviewed the Preferred Development Options and consulted widely with our residents, we have reached the conclusion that the current PDO does not offer a vision of Warrington which we or the public we represent wish to become a reality. We hope that our response, together with the views of the thousands of residents who have contributed to the consultation will be given proper consideration. To not do so would suggest an unacceptable democratic deficit around an issue of critical importance to the future of our town.

Housing target

1. We acknowledge that the Local Plan aims to be ambitious for Warrington. We too are ambitious for the town. We do not feel that ambition alone though can be used as the basis for the housing target which the Council has adopted at the heart of the PDO (i.e. 24, 220). The demographic and economic forecasts suggest a lower number would be more acceptable.
2. Furthermore, recent changes in government policy around calculating housing needs would suggest that the figures adopted in the PDO are unnecessarily high. If WBC acts in line with the new methodology, surely it can have confidence that the plan would withstand the scrutiny of the planning inspectorate and any potential legal challenge.
3. The PDO states, in 4.6, that the figure of 1,113 houses p.a. can address congestion issues through improved infrastructure however nowhere in the document can we find an adequate justification for this claim. Many of the bolder ideas around infrastructure, such as a third high-level crossing of the Ship Canal (which is in addition to a Western Link which is far from guaranteed) are suggested as 'optional', which leaves the infrastructure improvements being discussed as necessary as quite underwhelming. Given the current state of congestion at the town's current level of development, we believe substantial infrastructure improvements are already needed, above and beyond those discussed in the PDO. To add to housing and only deliver some of the infrastructure suggested in the document would only have a negative impact on the town.
4. Whilst we understand the Council's need to be consistent as it applies for a devolution deal and to make the case for other regional projects, the figures in the document also don't seem to take into account any changes to economic and demographic outlooks in light of Brexit. There is also some contradiction between the PDO document and supporting documents. For example in the transport papers, Warrington's population increase is noted to be below the national average however in the main PDO no reference is made to this.
5. Furthermore the decision to increase the housing target so significantly from the OAN appears to be entirely of the Council's choosing. Whilst we appreciate the Council is reluctant to face another appeal against its target, there seems to be little or no appetite amongst the public for such a significant increase in the town's size. Surely this must be taken into account.
6. It also appears to be unnecessary to adopt a twenty year plan period, not least due to the aforementioned uncertainty. A shorter plan period would allow for some of the

current uncertainties to be resolved and allow greenbelt to be safeguarded. We suggest a fifteen-year plan period is the maximum used for this Local Plan.

7. We would also like to see the housing targets reduced to a level which balances ambition for the town with public opinion, and better reflects the most *likely* economic and demographic outlook rather than the Council's most *preferred* outlook.

Spatial options

8. As a result of the unnecessarily high housing target, we believe the Council has tied its hands in deciding its spatial options, as it has had to find substantial amounts of green belt land which might not be required were the overall housing targets reduced.
9. We recognise that green- and brownfield sites within the existing urban area have been maximised within the PDO. This is welcome. We also welcome attempts made in the document, not least shown in the development timelines, which show the Council's principle of developing these sites before any greenbelt sites. That said we would question what absolute guarantees can be given to ensure that land released from greenbelt will be protected until the existing urban area has been fully developed. This is particularly true of safeguarded land, which would be at greater risk if guarantees on this principle are not made and adhered to. Adopting a smaller housing target and shorter plan period would mean no greenbelt would need to be released.
10. By reducing the housing target and plan period, the housing availability which the Council needs to demonstrate can be adequately accommodated. As a result, no greenbelt needs to be lost so the spatial options outlined in the plan no longer need to be pursued.

Housing density and land required

11. The land requirements calculated throughout the document appear to be based on an assumption that 75% of land will be developable with 30 dwellings per hectare. Not being planners, we are not entirely sure what an analogous existing housing development would be. We would suggest that this needs to reflect a housing mix that addressed housing needs.
12. There are at least two clear housing needs in south Warrington that are currently almost completely unaddressed. One is for smaller family homes which would be affordable for first-time buyers, young families and those on lower incomes. The second is for older people who are looking to downsize without leaving their local area. In our minds, providing these types of housing would not only meet a social need but would also reduce land requirements and therefore reduce the amount of land needed to be released from greenbelt. Furthermore, we would hope that the density within the existing urban area can be fully modelled to ensure that the greenbelt needed is minimised.

Infrastructure

13. Despite the PDO's claims that Warrington's traffic congestion issues can be solved through the suggested level of development, the inclusion of one-third of the houses

in suburbs to the south of the Ship Canal are highly likely to increase Warrington's car dependency. Whilst perhaps hidden in the ambiguity of the PDO, there is little reference to public transport, particularly the bold and innovative schemes – such as light rail – which might actually make a substantial improvement to Warrington's transport problems. The continuing disconnect between the location of housing and the location of jobs only exacerbates the existing transport issues. To truly solve Warrington's traffic problems, a much greater level of investment in strategic roads and transport alternatives, such as light rail, is needed in the plan.

14. One of the key concerns with the PDO is near absence of information about how new infrastructure will be financed. WBC leadership has gone on the public record stating that infrastructure will be installed first, however the mechanism to do this remains a major doubt. Given the level of investment required, there is surely a need for transparency around how it will be delivered. There are too many examples of unfinished developments around the borough for people to have any confidence without such transparency around funding.
15. Many of the assumptions and choices in the plan are based around the successful delivery of the Western Link. Does WBC have any 'plan B' for what might happen should the Western Link not be successfully delivered?
16. Yet another unknown within the plan, which affects many of the assumptions, is how the introduction of tolls on the Halton Mersey crossings could have on traffic flows through Warrington. Again, given the timing of the new bridge's opening, what provisions are being made for Warrington's infrastructure should there turn out to be a negative impact on Warrington's road network?
17. Much reference is made to strategic infrastructure 'unlocking' areas for development. One such piece of infrastructure is a further optional Ship Canal crossing to the east of the town. The suggested route on the PDO's maps incorporates the Trans Pennine Trail and disused railway bridge near Latchford Locks. Unfortunately the PDO seems to have come to the wrong conclusions. A further high-level crossing of the Ship Canal is almost essential, even for current levels of traffic in the town. Indeed such a crossing was part of New Town plans, with the capacity of the Cantilever Bridge being increased through a new high-level bridge. Should WBC insist on anywhere near the level of development south of the Ship Canal, then it should build a new high-level crossing. There seems to be little sense in using the old railway embankment however, which has become a much-valued amenity in the form of the Trans Pennine Trail. If anything, the embankment should be retained in its current form unless it is to return to its original use – as a public transport route. Other routes must be more useful, not least in terms of not simply depositing further volumes of traffic at Bridge Foot.
18. The potential for light rail needs to be more fully considered and needn't be impingent on linking into the Greater Manchester Metro. If the town is ambitious about its future and making it a sustainable one, then providing public transport is essential.

Economic activity

19. Given the fast-changing economic landscape of the UK, a degree of flexibility around the economic activity areas is to be expected, however we would hope that the aspirations for economic activity involve 'future-proof' jobs and also try to match

activity to the housing types of different locations. Greater detail on the types of economic activity being aspired to would be essential in the next iteration of the plan.

Public services

20. Mention of public services provision is welcomed. There are however many concerns around delivery. In terms of schools, current government policy prevents WBC from opening new schools, required academy chains or free school providers to open new provision. In light of this constraint, how confident is WBC that new school provision on the scale required can be achieved? Furthermore, how would funding for schools be achieved in order to have school places ready before developments are completed?
21. In terms of healthcare, there are national concerns around resourcing and staffing GP surgeries. Are there developments on a similar scale elsewhere in the UK which have had successful health delivery? Also on the subject of health, there are a host of constraints affecting Warrington General Hospital, yet no mention seems to have been made for how hospital-provided services can cope with development on the scale planned in the PDO.
22. As with loss of greenbelt and provision of infrastructure, there seem to be unacceptable risks in terms of the delivery of public services. A lower level of development would reduce these risks.

Social and environmental impact

23. As recent motions to Council illustrate, air quality is a major concern in Warrington. This is largely driven by traffic congestion. Nothing in the PDO would give confidence that congestion will be solved and therefore air quality will, if anything, get worse. Given that 5% of deaths in the town are in some way related to poor air quality, how can a plan which leads to a further decline in air quality be considered either sustainable or desirable?
24. The loss of green space will have irreversible impacts on wildlife habitats, hydrology and public amenity. Much of the green belt earmarked for release is ecologically important. Flooding is a growing concern, as evidenced by the Ship Canal flooding of last year. People consider the woodland and fields of south Warrington to be the 'lungs of the borough'. Urban sprawl of the nature suggested in the PDO will be incredibly damaging both environmentally and socially. The character of the villages in south Warrington will be changed beyond recognition.

If this is a genuine consultation on what are only preferred *options*, then we implore the Council to carefully consider the scale of public concern over the proposals. The level of development and concentration of that development in certain parts of the town is wholly unreasonable, unjustified and most importantly unfair. Whilst accusations of 'NIMBYism' might be levelled towards the residents of the affected areas, we have found that the overwhelming majority of people we have spoken to appreciate that Warrington must have

some level of development, but they seriously question the scale and shape of the current proposals. We believe a far fairer set of options could be drawn up and this should be the next step before a Local Plan is drafted. There is no need to plan for a twenty-year period and many methodologies suggest that a lower volume of housing would withstand inspection and legal challenge. A shorter plan period, for instance over fifteen years, with fewer houses could mean that little or no green belt need be released. Given the current uncertainties such as Brexit, the future of the Manchester Ship Canal and the closure of Fiddlers Ferry, the assumptions used in the plan for economic and demographic change could quickly be undone. It seems illogical to plan ahead for a longer than necessary period. It would be a saner approach to plan for a shorter period, during which greater clarity

Finally, one of the key sources of angst during this consultation on the PDO has been due to the woeful lack of communication from the Borough Council. The increases in attendance to consultation events as the summer has gone on is representative of this. At the beginning of the process, attendance was worryingly low. Officers speaking at an early event said as much. It is only thanks to the selfless effort of residents groups, helped in some part by local councillors and Parish Councils, that many thousands of people know anything about the PDO consultation. This improved awareness was reflected by the huge turnouts and long queues to later consultation events. To communicate so poorly is a dereliction of responsibility by the Borough Council. Whilst we appreciate resources are sparse, for something as important as the Local Plan, there must have been means available to contact households directly, especially in the most affected areas in the south of Warrington. We would like the Council to give assurances that communication can and will be better for the next Local Plan consultation in 2018.