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WARRINGTON
Borough Council

Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

2: Questions

Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Response:

The need for new homes and employment land is based on over-optimistic projections.

This is driven by an aspirational New City concept that is not supported locally and has been driven by the unelected and unaccountable LEP (Local Enterprise Partnership). The New City concept has no planning status at this time, and remains an aspiration that can have different spatial expressions through the development plan system. One of the key aims of the NPPF was to include people and communities, partly because targets and decisions were imposed by bodies remote from them. To press ahead with an LEP-defined concept undermines this aim of the NPPF.

Given that the new plan will take some time to progress, new options should be tested using the Government's new standardised methodology for calculating housing need over the 2017-2027 (*Planning for the right home in the right places: consultation proposals* (DCLG 2017)).

The new standardised methodology will allow for greater flexibility in plan making; the government expects housing need figures to be reviewed every five years.

The use of the standardised methodology indicates that:

- There are no 'exceptional circumstances' demonstrated to justify a review of existing Green Belt
- Development can be accommodated within the urban area
- Because of this the permanence of the recently adopted Green Belt can be maintained

The employment land target in the plan is a simple extrapolation of the take-up from 1996-2016 to 2037. This method fails to take account of significant

Response to Question 1 continued:

technological change over this period, or the impact that continued peripheral expansion has and will continue to have on inner Warrington. This is an impact that the existing Local Plan Core Strategy recognises by shifting the focus of expansion away from peripheral areas. We note that Arup, in the Council's Green Belt Assessment 2016, refers (para 18) to the fact that "the New Town development had remarkably little effect on the older urban areas of Inner Warrington".

The approach set out in the EDNA, and being relied upon by the Council is flawed. Economic forecasts from two reputable sources have been commissioned, but these are ignored in favour of a simplistic projection forward of past employment land take-up (EDNA, para. 11.6).

The projection being relied upon by the Council is the highest of all those undertaken as part of the EDNA. However, the EDNA has a range of figures from a surplus of 5.35 hectares of land to a shortfall of 276.37 hectares. Rather than exercise any reasonable caution by excluding the extremes, which is the usual approach with any projection, the highest shortfall figure has been selected: 276.37 hectares.

A more cautionary approach should have been taken. The EDNA (para. 10.32) identifies 231.87 hectares of potential employment land, yet 60.73 (26.19%) hectares of this has been granted planning permission for housing; a further 18.24 hectares (7.9%) has landowners no longer interested in pursuing a scheme. Demand for employment land and the buoyancy of the market is being over-estimated. Past take-up is not a basis for future planning of the area.

Whilst not disputing the need for economic growth, this should be for quality economic development and jobs, but 117.14 hectares of the past growth rolled forward has been B8 distribution and warehousing (Table 57, EDNA). Projected forward this is 164.63 hectares (Table 59, EDNA).

Given that it is reasonable to assume that not all of this B8 development can go in the existing urban area, due to size and locational needs, a significant proportion of the 251 hectares of Green Belt the PDO proposes to release for employment will be for B8 warehousing uses.

Response to Question 1 continued:

The locational flexibility, low job creation, poor job quality, and prospects of significant automation do not make this an exceptional circumstance to change Green Belt boundaries. Such uses could go in numerous other non-Green Belt locations in the North West and elsewhere.

The jobs generated by B8 uses is also questionable. Based on figures in the Metro-Dynamics Report, June 2017, transport and storage jobs will increase by 927 (3.8% of all new forecasts jobs 2015-2040) using the Oxford Economics projections; or by 939 (4.2% of all new forecasts jobs 2015-2040) using the Cambridge Econometrics projection. On both projections a paltry return in exchange for the loss of large areas of Green Belt land.

What the PDO ignores is that the bulk of projected jobs growth for Warrington, using both projections is anticipated to be in financial and business services: 13,370 jobs (55.2% of all new forecasts jobs 2015-2040 using the Oxford Economics projection); or 12,635 jobs (57% of all new forecasts jobs 2015-2040 using the Cambridge Econometrics projection). The bulk of these jobs one would reasonably expect to be in town centre and more urban locations. Locations that current development plan policy seeks to promote and which a new PDO should prioritise. We note that the Metro-Dynamics Report (June 2017) prepared for the Council states that "Another legacy of the New Town years is underused land in Warrington town centre." (page 16).

Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

Response:

The targets identified are broadly supported by the Parish Council and, with corresponding restraint in more peripheral areas, would help to achieve regeneration within the main built-up area.

A target based on the government's proposed standardised methodology for housing could be met within the existing built-up area, which has capacity for 15,429 homes.

Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

Response:

This is the wrong question. The starting point for any review of the Green Belt is: "do exceptional circumstances exist to warrant review of the Green Belt?"

In this case, exceptional circumstances do not exist to warrant a review of the Green Belt.

The Council's case is based on a single line of argument that Warrington should become a New City. This is an aspirational LEP-generated concept that has no demonstrable public support and undermines adopted development plan policy.

Without the "New City" concept, the Council's case is merely that the (over-optimistic) housing growth projections cannot be met by allocating land in the existing urban area. Meeting development needs alone is not an "exceptional circumstance"; the Green Belt is there to perform strategic functions that limit development.

Nor will the Council be able to rely on these overly optimistic projections. As the plan progresses these will be replaced by projections derived from the new standardised methodology for calculating housing need. This produces a requirement of 903 dwellings *per annum* over the period 2017-2027 (1). Using these figures there is no need to review the Green Belt boundary. There is capacity for 15,429 homes in the existing urban area.

- (1) Based on a ONS/DCLG projections of 800 new households per annum 2017-2027 and the application of the adjustment factor at the local affordability ratio of 6.06 in 2016.

The Parish Council is totally opposed to release of land from the Green Belt for the reasons given in this document. In further support of its position, the Parish Council notes that there has been an unprecedented level of public involvement in this consultation, and the opinions expressed by the public have been overwhelmingly hostile to the proposal.

Question 4

Do you agree with the new Local Plan Objectives?

Response:

The Parish Council objects to objectives W1 and W2.

Objective W1 seeks to promote the transition of Warrington from New Town to New City. This is not supported locally. Objective W1 includes a self-defeating internal contradiction, namely the regeneration of inner Warrington and the creation of new sustainable neighbourhoods. As noted previously, Arup in the Council's Green Belt Assessment 2016 refers (para 18) to the fact that "the New Town development had remarkably little effect on the older urban areas of Inner Warrington". **Hence the adopted development plan strategy.**

The housing and employment targets are over-optimistic and the housing target will eventually have to be calculated using the new standardised methodology if the PDO proceeds.

Objective W1 seeks to create "new sustainable neighbourhoods" but the PDO will fail to achieve this. It will undermine efforts to create sustainable neighbourhoods in inner Warrington, whilst at the time creating a Garden City Suburb that is not itself a form of sustainable development due to its significant adverse environmental, social and economic impacts. In summary, the Garden City Suburb will result in the loss or damage to numerous environmental assets; lead to a poorly connected collection of housing estates dependent on the use of private cars. There is no rail transport, and, based on the Framework Plan Document, there would be no integration of housing and employment uses. This will lead to poor social cohesion in the Suburb itself and due to the re-direction of investment, there will be a severe impact on the social cohesion and well-being of inner Warrington.

Objective W2 seeks to review the Green Belt. This has not been justified against the "exceptional circumstances" test and allowing development to sprawl in the south of the Borough would fail to be "sensitive". It undermines permanence, the key feature of a Green Belt, which in this case was adopted as recently as 2014. Objective W2 undermines a key thrust of Objective W1, which is the regeneration of inner Warrington.

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Response:

Given that the starting point of the PDO is the New City concept, other options based on existing and more realistic development strategies have not been considered.

Continuation of the long-standing adopted plan strategy, originally adopted in the 2006 UDP, of regeneration supported by restriction of development in peripheral areas, is preferable, particularly when looked at in the light of the Council's own economic forecasts for sectoral job growth.

A more dispersed form of development in and around Warrington and in neighbouring local planning authority areas would also be preferable.

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

Response:

The assessment is flawed.

Not all options have been considered and the assessment is heavily biased towards a New City concept identified and promoted outside the democratic and accountable development plan-making process. The options analysis is biased and pre-determined to lead to one conclusion. We comment further on the lack of supporting evidence and deliverability elsewhere.

Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

Response:

No. The PDO is flawed. The PDO should seek to continue existing development plan strategy. This will lead to sustainable development and regeneration of inner Warrington whilst maintaining the permanence of the recently adopted Green Belt and avoiding other significant adverse impacts in locations that are not sustainable.

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

Response:

The Parish Council broadly supports this option for the town centre but it would be undermined by release of peripheral Green Belt land for housing and employment.

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

Response:

The Parish Council broadly supports this option but it would be undermined by release of peripheral Green Belt land for housing and employment.

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

Response:

The Parish Council broadly supports this option but it would be undermined by release of peripheral Green Belt land for housing and employment.

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Response:

The PDO for the Garden City Suburb is merely aspirational. The Council has failed to undertake any detailed feasibility or viability work that might suggest this option is deliverable. For example, there is no forward-looking Transport Study or detailed modelling. The Transport Study, for what it is worth, is simply a summary of the existing situation.

This is contrary to para 173 of the NPPF. This states that pursuing “*sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable*”. No detailed studies have been undertaken; this is acknowledged at para 6.2 of the PDO “The Council will be undertaking more detailed site assessments”. No up to date Transport Modelling has been carried out (para. 6.3 of the PDO); there is no up to date Infrastructure Delivery Plan (para. 6.4 of the PDO); and no viability assessment. The PDO therefore fails two of the key tests of soundness: that it should be justified (i.e., based on proportionate evidence – there is none), and effective (i.e., deliverable over the plan period – again there is no evidence to support this). Indeed, the scale of the development and the scale of obligations identified, including off-site works not related to the Garden City Suburb itself, are such that viability is further undermined.

The only viability information available is the cursory and very limited 14-page Spatial Options Assessment carried out by BNP Paribas. This does not address any of the detailed concerns identified. The conclusion reached is that “the land value uplift of Green Belt land arising from planning permission can support infrastructure required to support growth”. This is merely an assertion because, as stated above, the Council has not identified to any degree the infrastructure required. By way of illustration, there is no consideration of transport issues facing the Garden City Suburb due to the limitations of the existing elderly crossings of the Ship Canal and the single existing River Mersey crossing at Bridgefoot and the practical difficulties and costs of addressing these.

Response to Question 11 continued:

There is no consideration of impact on the strategic highway network, particularly the motorway, which should be used for inter-urban transport. Nor is there any evidence to support the idea that a new strategic road linking the Garden City Suburb with inner Warrington is feasible or viable, particularly given the need for significant land assembly, that may ultimately require compulsory purchase. This project is currently unfunded.

The value capture from rising land values is unrealistic. The land is largely in private ownership and there is no realistic mechanism to capture this value to secure the however sketchily-defined but significant infrastructure needs.

The Garden City Suburb also fails to have proper regard to environmental issues: e.g. there is no Landscape Visual Impact Assessment; no assessment of the impact on designated heritage assets, listed buildings and Grappenhall and Thelwall's Conservation Areas. There is no Sustainability Appraisal or Habitat Regulations Assessment.

There is no work to understand the implications for air quality, which has emerged as a significant issue, following the recent precedent of Cheshire East.

None of these issues is addressed in the PDO, or the supporting documentation, in the detail that would be expected at this stage of the plan preparation process.

The published Framework Plan Document is a light touch brochure that has no in-depth analysis of constraints, feasibility, viability or deliverability. It is not fit for purpose in seeking to justify such a significant development.

Because of these failings, should the PDO proceed, it will be found not to be sound.

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

Response:

No detailed comments at this time, but further peripheral development undermines the existing adopted spatial strategy and the PDO's Objective for regeneration in inner Warrington.

Question 13

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Response:

No comments to make at this stage.

Question 14

Do you agree with our approach to providing new employment land?

Response:

The employment land target in the plan is a simple extrapolation of the take-up from 1996-2016 to 2037. This method fails to take account of significant technological change over this period or the impact that continued peripheral expansion has, and will continue to have, on inner Warrington. This is an impact that the existing Local Plan Core Strategy recognises by shifting the focus of expansion from peripheral areas. We note that Arup in the Council's Green Belt Assessment refers (para 18) to the fact that "the New Town development had remarkably little effect on the older urban areas of Inner Warrington".

See also the comments made in relation to Question 1.

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

Response:

No comments to make at this stage.

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

Response:

No comments to make at this stage.

Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

Response:

This is by way of conclusion.

The PDO is fundamentally flawed.

It inverts the normal planning process of research, analysis and options preparation.

The starting point for the PDO is that Warrington should become a City. This is an aspiration identified by a quango – the LEP. It is not an aspiration that has been developed with the support of the local Warrington community. This approach contradicts one of the Government’s Core Planning Principles that planning should be “genuinely plan-led, empowering local people to shape their surroundings... ..setting out a positive vision for the future of their area.” (NPPF, para. 17).

The PDO should be withdrawn and a new PDO developed that is “aspirational **and realistic**” (my emphasis, NPPF para. 154) not merely “aspirational”.

To pursue the present PDO further will be to incur further costs (time and money) on a plan that on examination will **not be found to be sound** because:

- It is **not positively prepared**, seeking to meet aspirational needs when it is not reasonable to do so and which are not consistent with achieving sustainable development.
- It is **not justified**; other reasonable alternatives have not been considered and the PDO is not based on proportionate evidence.
- It is **not effective**; the PDO cannot be delivered.
- It is **not consistent** with national policy because it will not deliver sustainable development.