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28th Sept 2017

Dear Sir,

I object to Warrington Borough Council's Preferred Development Option (PDO) on the following grounds:

Loss of Green Belt

The National Planning Policy Framework says green belt boundaries should only be altered in "exceptional circumstances". To justify releasing greenbelt land in its PDO the Council has placed an over-reliance on the October 2016 Arup report on the green belt. The report should be set aside and an accurate assessment be made of greenbelt issues before moving to the next stage of the Local Plan.

The following issues cast doubt on the validity of the Arup report:

The status and accountability of the report.

The October 2016 Arup report is unsigned and the quality assurance verification is not available for scrutiny. The status of the report is questioned given the health warning appearing on the title sheet of the report which points out that the report 'is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party' for its use. That qualification calls into question the use of this document by the Council to support the Local Plan process as part of the public consultation. Furthermore, the scoring system for the methodology is also challenged. Most importantly, it appears to rely on a majority vote of the 'professional' assessors. There appears not to be any record of who these assessors were, who were they employed by, how many assessors participated, who were they accountable to, what was their previous experience in this kind of work, what was their professional qualification and how was the vote split on each issue? This lack of accountability and transparency is a serious flaw in the report. The public is entitled to know how much reliance it can place on this most important document, the decisions taken within the report and who the decision takers are.

The insensitivity of the Arup methodology.

In selecting the preferred option, the Council relies heavily on the October 2016 Arup report within which a greenbelt assessment methodology is described and the results of applying that methodology are recorded. The purpose and functionality of greenbelt and greenbelt policy as described in the Arup report is recorded as follows:

1. To Check the Unrestricted Sprawl of large built up areas This should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.
2. To Prevent Neighbouring Towns from merging into one another Green Belt is frequently said to maintain the separation of small settlements near to towns, but this is not strictly what the purpose says. Assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. A Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.
3. To assist in safeguarding the countryside from encroachment - The most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
4. Preserving the Setting and Special Character of Historic Towns This applies to very few places within the country and very few settlements in practice. In most towns, there are already more recent development between the historic core and the countryside.
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land The amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose. The Arup report goes on to say that guidance further suggests that land which is assessed as making a relatively limited contribution to the Green Belt, or land that might be considered for development, would be where:
 - : It is effectively 'infill' development;
 - : It is well contained by the landscape;
 - : It would cause little harm to the qualities that contributed to the distinct identity of separate settlements;
 - : It could create a strong boundary with a clear distinction between 'town' and 'country'.Whilst it is acknowledged that the assessment of landscape quality does not form part of the required assessment process for greenbelt functionality, there is a need to place a greenbelt assessment methodology within a proper context. That context should and must be rooted firmly in a finely grained understanding of the landscape character of the area, properly recorded and fully argued.

The General Areas, as recorded in the Arup report appear arbitrary and are defined by nothing other than physical lines of separation. They are unsupported by a Character Assessment, and are distorted further by a series of random mergers. The Landscape Institute methodology for assessing landscape character (LVIA) is commonly accepted as the industry standard and has been tested at many public inquiries. This part of the planning process is missing in assessing the greenbelt functionality. It is acknowledged that the 2007 Landscape Character Assessment goes some way in

making a 'whole town' assessment; but that study is not fine grained enough to use sensitively as part of a greenbelt assessment and does not have enough detail to identify character areas for the Parcels Assessment. Point 2 of the above criteria calls for a Character Assessment and on this foundation the greenbelt assessment methodology should be built. The Arup methodology appears not to do this, nor does there appear to be any reference to the 2007 Landscape Character Assessment or any other Character Assessment within the Arup report.

Furthermore, and with particular reference to Area 10 as part of the General Area Assessment, the Arup methodology and report has chosen not to recognise the protection offered by greenbelt land to the 'greenbelt over-washed' settlements of Grappenhall Village (a Conservation Area) and Stretton. The protection boundary chosen by Arup appears to ignore this effect and does not take this functionality into account at General Area level. Little wonder that the areas of land around these settlements perform poorly in the General Area Assessment. And little wonder these areas perform better when assessed within the context of the Parcels Assessment when this effect is recognised.

In planning terms, I would request that the Council gives consideration to two simple questions: Has greenbelt land and greenbelt policy protected Grappenhall Village from development beyond its boundaries? : Has greenbelt policy limited ribbon development along Stockton Lane (part of Stockton Lane having already been developed prior to greenbelt designation)? The Arup methodology for assessing General Areas records that the protection offered by this greenbelt land as 'weak'. It is difficult to conceive how this position can be supported by the Council. To the layman and the professional planner alike, the answer to both the above question must be a resounding yes. A methodology that runs contrary to common sense should not be relied upon and needs to be reconsidered.

Inconsistent Results

As noted above, the General Area Assessment for Area 10 (part of the area for SWUE) is recorded as 'weak'. The Parcels Assessment of the same area tested against the same criteria recorded a set of results that were at worst 'moderate' (8 parcels weak, 12 parcels moderate and 7 parcels strong). This inconsistency is further compounded when the Parcels Assessment is cross referenced against the results shown in the July 2017 Green Belt Assessment (Additional Site Assessments of call for Sites Responses and SHLAA Greenbelt Sites) report where the distribution of results for development areas conflicts further with the General Area Assessment (15 weak, 15 moderate and 4 strong). Again, at worst this would give an overall performance of 'moderate'. Compounding this error, some of the results of these sites highlight further conflicts and inconsistencies compared with the results of the Parcels Assessment.

Incomplete Assessment Process

Whilst the Parcels Assessment as a check on the General Area Assessment is to be applauded within the context of the methodology chosen, the vital loop back into the assessment process for reassessing the status of General Area 10 after the Parcels assessment has been completed is not made, leading to a false set of conclusions. This is a very important omission, as the grading of Area 10 as 'weak' has greatly influenced the outcome of the plan making process. Indeed, the Arup report acknowledges in principle this conflict at paragraph 150, but fails to examine the impacts of the

Parcels Assessment on the General Area Assessment and fails to reconsider the ranking of Area 10 in the General Assessment. Had the process been completed, it is difficult to see how the grading of Area 10 would remain as 'weak'.

Scale and Size

The PDO will declassify areas of green belt and re-designate them as "safeguarded for future development." If development cannot be planned for the foreseeable future then the need to declassify greenbelt cannot be regarded as "exceptional circumstances" as set out in the NPPF and previous WBC planning policies. In choosing this option it commits WBC to a large scale development on greenfield and green belt land to the south east and south west of the borough over the next 20 to 30 years. However, it is very hard to predict if the council's calculation of housing and economic growth will still be valid even 5 years from now. Major shifts in the national and local economy could render this PDO redundant, but green belt land would still be declassified and lost.

There are also extremely large brown field sites that are likely to become available in the next 5 years. Warrington hospital is likely to re-locate and the government has a policy to close all coal fired power stations by 2020 to meet its international commitment to cutting greenhouse gases. Fiddlers Ferry power station has already had one reprieve and its eventual closure would release a great deal of land. To commit to a plan now that ignores that possibility is reckless.

The Government has published a new methodology for calculating local housing need to provide a consistent basis for all Local Authorities to establish their housing need. Using that new methodology, which supersedes that used in the PDO consultation, the projected calculated need is for 914 new homes per annum. This is slightly lower than the average number of new homes completed (920) each year over the last 38 years and considerably lower than the 1113 demanded in the PDO and nearly 5000 fewer in total. The difference between the two figures is the result of the council's ambitions for growth, not the need to satisfy existing local demand and as such cannot be regarded as "exceptional need".

City Status

The PDO is driven by a political agenda to turn Warrington in to a city. To achieve this policy WBC has chosen an option that requires more land to be released for housing and economic growth. Even on the council's own projections there is another option which could be followed that would fulfil demand. WBC has also ignored possible brown field sites in the plan and could also build to a higher density in the town area. Therefore, the PDO cannot be said to meet the "exceptional circumstances" test.

In a paper to this year's Local Government Association conference [REDACTED] Executive Director - Economic Regeneration, Growth & Environment at Warrington Borough Council, said more than

once that one of the benefits of PDO to the council was that it released the value of the green belt land in south Warrington so that money could be spent in the wider community. This cannot be said to meet the “exceptional circumstances” test.

Highways and Traffic Issues

The local highway proposals for the Preferred Option have not been tested to determine the effects on their capacity to carry the required traffic loadings or knock-on effects on the Strategic Road Network.

In response to the Core Strategy Options Report the Highways Agency submitted comments to the Council in August 2010 regarding the Core Strategy proposals. The Highways Agency made it known that the above routes were of national importance and as such the Highways Agency would be concerned if any proposed development sites or land allocations were to have an adverse impact upon their safety and/or operation of the SRN. The Highways Agency further stated that, “... the Agency would recommend that when looking at the impact at the SRN, focus should be placed upon the current operation of the network and the impacts resulting from land allocations contained within the emerging LDF. In addition to stress, ‘level of service’ performance indicators should form part of the evidence such as journey time analysis and average peak hour speed etc.” The Highways Agency then went on to say that, “The next step is to identify the infrastructure (transport) shortfalls which need to be addressed to support and deliver the site allocations being promoted by the emerging LDF. If the LIP (Local Infrastructure Plan) is to achieve this, and fulfil its purpose of providing a sound and robust evidence base to support the LDF, infrastructure provision and transport intervention need to be guided by outputs from the traffic model. This would enable co-ordination of development and infrastructure phasing which is requisite to deliver sustainable development and growth.”

At this stage WBC is not in a position to judge whether the transport proposals in the PDO will work and whether the Council can deliver the plan’s objectives until this work is completed. It is therefore difficult to understand how the PDO has been adequately tested. However, it is possible to take some clues from the information so far provided. In the SWUE Framework Plan (June 2017) the Council states that, “... However, the surrounding road network cannot accommodate any further development traffic without significant infrastructure improvements. The initial phases of the proposed strategic road will therefore need to be completed before any further residential development comes forward. It is also important to stress that the Secondary school will need to be completed by the end of phase 2 given capacity constraints on secondary school places across south and central Warrington.”

Close inspection of the infrastructure phasing in the same document reveals that a new crossing of the Manchester Ship Canal will not be started until Phase 3. Given the size and complexity of that project, it is reasonable to assume that it will not be available until the end of that phase of the plan, some 15 year after commencement of the plan. The only conclusion that can be drawn is that all public transport links and the road links for approximately 4500 houses and local services must be accommodated within the existing highway network (it is accepted that other enabling roads will be built, but these all lead to the existing road network). This is a major flaw in the plan and is likely to

place unacceptable pressure on the Local and Strategic Road Networks, none of which has been properly tested. This runs contrary to the commitment given in the Council's Regulation Scope and Contents Document dated October 2016 which stated at paragraph 25 "2.25 The Council is in the process of updating its Multimodal Transport Model and Strategic Flood Risk Assessment. These pieces of work will feed into the broader assessment of development options under the Sustainability Appraisal process and the development site assessment as set out in Appendix 2." The Council has failed to honour this commitment.

The local highway proposals for the Preferred Option have not been tested to determine the effects on their capacity to carry the required traffic loadings or knock-on effect on the Strategic Road Network. This runs contrary to the Highway Agency's (now Highway England's) stated requirement and as such could render the plan undeliverable. Please ensure that all options are properly tested and reported on before moving forward to the next stage of the plan making process. In the same consultation communication referred to above, the Highways Agency stated, "...there is no assessment of capacity of these local roads or the current and projected levels of service on the local network. The Agency would recommend that such an assessment is provided in order to give some level of assessment of capacity on the local road network. This is especially important where the SRN forms part of a route in conjunction with the local road network or where the SRN provides an alternative to a local route." The Highways Agency went on to say, "The next step is to identify the infrastructure (transport) shortfalls which need to be addressed to support and deliver the site allocations being promoted by the emerging LDF. If the LIP (Local Infrastructure Plan) is to achieve this, and fulfil its purpose of providing a sound and robust evidence base to support the LDF, infrastructure provision and transport intervention need to be guided by outputs from the traffic model. This would enable co-ordination of development and infrastructure phasing which is requisite to deliver sustainable development and growth."

There is no evidence of this work being carried out and as such the viability and relative performance of the Preferred Option cannot be adequately tested.

Pollution

No high level environmental and ecological survey has been included in the PDO. In 2016 the WHO found that Warrington has the second highest level of air pollution in the North West. With the standard planning requirement to allow for 2.6 cars/household the PDO will inevitably result in more traffic and more pollution. In addition the "east relief road" will result in a major road carrying cars and commercial traffic from Jnt 10 M56 through what would be a densely populated new development, inflicting more pollution on the area.

Warrington has a higher percentage of people commuting over 20km to work in (17%) or out (18%) of the borough than the rest of the North West (10% & 14%). Such a high density of housing as is proposed in the PDO will inevitably increase those journeys.

Healthcare

Warrington and Halton hospitals are already running at near full capacity, as are most of the town's GP's. The huge increase in the population envisaged by the PDO will put enormous strain on health services in the area. The PDO promises new health facilities, but there are no plans as to how those might be delivered.

Deliverability

The council has failed to demonstrate that the Local Plan is deliverable.

The National Planning framework (NPPF) sets out the criteria within which the preparation of the Local Plan must be prepared. Paragraph 173 of the NPPF headed Ensuring viability and deliverability states, "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."

Furthermore, Paragraph 177 states, "It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review."

The NPPF makes it clear that it is for the Council to demonstrate the deliverability of the Local Plan. For reasons given above, WBC has failed to do this, nor has the Council provided proper costings to demonstrate that the infrastructure necessary to facilitate the development can be funded.

WBC identified 'Assessment Criteria' designed to test the council's decision including: greenbelt implications, strategic road network, local road network and delivery issues. In addition, the Council made a commitment in the Local Plan Review: Regulation Scope and Contents Document dated October 2016, to proceed following a flow diagram. It is clear from the flow diagram that an up-to-date Landscape Character Assessment, an Ecological Assessment, a Multimodal Transport model and an Infrastructure Impact Assessment (to name just 4) were to be carried out to feed into establishing options for spatial distribution taking into account the pool of submitted sites. These documents are not available to the public and there seems to be no evidence that the work has been carried out.

This is a serious departure from the Council's Local Plan Review and potentially affects the legitimacy of the work leading to the Preferred Development Option selection. This indicates that the selection process leading to the 'Preferred Option' is seriously flawed and should be withdrawn.

Yours sincerely,

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