

Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH



29 September 2017

Dear Sirs

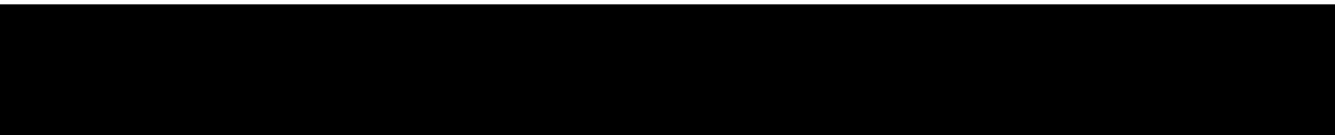
**Warrington Borough Council Local Plan Preferred Development Option Regulation 18
Consultation September 2018**

I wish to object to the Counsel's preferred development option for the following reasons:

The flawed consultation process

In the Supreme Court Case of Haringey Borough Council 2014 the benchmark for the standards of local authority consultation were set. The case made it clear while there is no general legal duty to consult people affected by decisions a duty to consult may arise out of the Council's common law duty of fairness.

The key message from the Haringey Case is that consultation is carried out fairly. I consider that Warrington Borough Council has failed in several respects. The highest court in the land requires that if a person is to be worse off as a result of the proposals they should be contacted directly by hand delivered letters and be telephone if necessary. This should have been reinforced by street notices and press releases, none of which the Council have done. The Courts have determined that use of the Council's website alone is not sufficient. People affected should have been identified and targeted with communications. Most of Grappenhall will consider themselves to be worse off as a result of these proposals but no one was contacted directly. Communication has therefore been ineffective and compromises the consultation process.



There appears or is no evidence of the scoping exercise around the consultation and there is no steering group. The greater the involvement with the community the better however, no links have been forged with local groups, community representatives, bodies and forums by the Council to ensure an understanding of the proposals and also the process involved.

It is not clear how the Council has determined the necessary period of consultation. It has given the minimum time possible for people to be consulted. Consultations of this size and nature could last for four months. The Council has consulted over the holiday period meaning a large proportion of those affected will not have been made aware of the consultation being carried out or will have been unable to access the information provide.

There is no evidence of a communications strategy. The communication has been very inadequate. The information is poor and the plans are illegible. Information from the planning officers at the public meetings has been conflicting and unclear. In addition, the data and documents provided in the consultation are not digestible during the period allowed for the consultation.

There has been no proper access given to the consultation documentation. The information has been place on line and at libraries only as far as I am aware. Only a limited amount of paper forms have been made available and then only at the request and by collection from the Council officers. The Council has relied too heavily on online forms and information. The Council should not assume that people have access to technology.

There has been no proper data collection at the consultation meetings. A note of the number and name and address of attendees was not taken. Feedback forms were not provided to the attendees so that either the Council or any other relevant body could determine the usefulness and appropriateness of these meetings. Attendees at the meetings did not see the Council's planners take any notes of comments made to them.

The consultation timetable does not seem to include the requirement for a report to be produced summarising the results of the consultation. The Council has failed to provide a proper consultation plan including a communications plan. These should have been drafted tested and then implemented. People have not been enabled to take part in this extensive plan consultation. The Council has not evidenced how it will be giving active consideration to the data collected.

Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)

The SEA and SA are statutory requirements of the plan making process. A Sustainability Appraisal report examining the local plan core strategy was published in 2012 and followed several years of evidence gathering consultation and plan development. The sustainability appraisal report is therefore predicated on material and assumptions that in some cases are the best part of a decade out of date. The July 2017 interim Sustainability Report which the authors acknowledged does not comply with the SEA and SA regulations and which will be superseded in due course if directed towards the appraisal of the revised housing and economic growth targets for the Borough. It is not an integrated document in the sense that it fails to adopt an integrated approach towards examining sustainable development for all aspects of the local plan. Its purpose is solely to address the environmental and social consequences of three housing allocation options in isolation

from the rest of the adopted plans. In doing so it creates contradictions and anomalies with the original 2012 Sustainability Appraisal Report based upon the original housing provision of 10,500 homes over the planned period concludes that the plan will protect and improve the quality and character of places, landscapes, townscapes and the wider countryside whilst maintaining and strengthening local distinctiveness and sense of place by focussing on the regeneration of previously developed sites and protecting green spaces. Further the strategic objectives of the local plan core strategy include "securing the regeneration and renewal of the older areas of the town strengthening the existing neighbourhoods and making the most efficient use of infrastructure, ensuring development brings benefits to their host communities whilst maintaining the permanence of the Green Belt in the borough and protecting it from inappropriate development".

This clearly places the PDO in conflict with the Council's own adopted plan. The 2017 sustainability report is flawed in that it fails to examine the significant environmental effects of the revised housing allocations in an integrated manner alongside other elements of the adopted local plan. By focusing only on the relative sustainability performance of housing and employment forecasts it overlooks the broader and accumulative effects on the adopted local plan that the proposals will give rise to when considered in combination with other types of development. There is no consideration for example of links to the LTP3 and whether certain elements of the transport plan are indeed still relevant. The evidence for the differentiation of the options in the 2017 Report is very weak and in some cases similar appraisal outcomes are being used to reject the other proposals while at the same time supporting option 2.

In conclusion it is very doubtful whether there has been a compliant SEA/SA process to support the adoption of the PDO. The methodology in the 2017 Report is flawed and based on the selective adoption of evidence and outcomes and in some cases actually contradicts the National Planning Policy framework and adopted plan policy especially in relation to development on the green belt.

Transport.

It appears that the employment land considered by Warrington Borough Council is akin to the site at Omega (Andy Farrell having said himself publically that he is looking for another site to replicate the Omega development in north Warrington). This would lead to manufacturing jobs which lead to a low knowledge economy. This is also contrary to national policy to increase development density around commuter hubs including rail, tube and tram stations. Land close to railway stations being a sustainable location, unlike development on the Green Belt. No adequate transport analysis has been carried out. It is hard to define Warrington as a city, it is composed of small settlements which lie between the much larger conurbations of Liverpool and Manchester and Warrington contains a complex travel to work package. It is unfortunate that Warrington housing targets have not been met but this is due the fact that the Council has not supported brownfield development which has been slower to be built out and which has led landowners and developers to focus on affluent areas before brownfield. There are also significant numbers of empty homes which have not been addressed by Warrington Borough Council.

Heritage



The assets of Warrington's green spaces should be used more effectively and not undermined. There are wider issues of identity and place which are being crowded out in favour of housing numbers. The new settlement will have a dramatic effect on the character and appearance of the local villages of Appleton, Grappenhall and Lymm. Sustainable development is only achieved by conserving and enhancing the historic environment. The plans as proposed for the new settlement do not make a contribution to the local character and distinctiveness of this area. The proposals for the new settlement in Grappenhall will have an impact on the setting and value of Grappenhall conservation areas including Victoria Road, York Drive and Ackers Road given their proximity to the proposed build development or new roads.

New settlements should be locally led - which the new settlement proposed in Grappenhall is not. I submit that any brown field site should be used before new settlements are considered and that the local plan period should be reduced to five to ten years. Large scale housebuilding of the nature proposed does not support the local economy unlike smaller developments adjacent to existing developments which do.

The new settlement proposals

The development proposed by Warrington Borough Council relies on working between developers and the local planning authority but such an approach is too big a task for the underskilled officers at the Council. There are no tools in place to actually deliver such an enormous change to the Borough and it is therefore too early to propose such a wide ranging and far reaching plan until there is a higher power in place to effectively carry out the development with the support of any local community. It appears to me that the transport is dictating the form of development, not assisting it and there is no variety of transport envisaged, merely roadways and car bridges.

A major extension such as the new settlement proposed in Grappenhall should be a choice of last resort. The private sector cannot cope with the size of the plan. The Government has stated that it will not support plans which merely use "garden" as a convenient label. The Government are committed to seeing "evidence of attractive well designed places with local support". The emphasis being on local support. The idea of the new settlement in Grappenhall is being led by developer interests and there is no evidence of an objective need for such a settlement. Indeed the effect of such a settlement would be to effectively alienate the existing community and may lead the existing settlement and the town centre to suffer decline. It is likely to result in a commuter settlement for Liverpool, Warrington and Chester which would not enhance Warrington as a place to live and work.

New homes and employment land needed in Warrington

It is clear that Warrington has ignored the Objectively Assessed Needs (OAN) Report carried out in 2017 which showed a figure of 738 homes per year. The figure quoted in the PDO of 839 is a hugely inflated ambitious target. It is evident that the current number of completions per year in the borough of 616 is more akin to what is actually required in the area.

Use of Green Belt Land



Preference should be given to previously developed or brownfield sites. The land either side of Broad Land should be kept as Green Belt land as it creates a buffer between the conurbations of Grappenhall, Appleton Thorn and Grappenhall Heyes and the M56 and M6 motorways. Development of these sites would lead to urban sprawl and the merging of the built up areas.

The concept of "safeguarded land" is misleading the national planning policy framework states that councils should "where necessary" identify in their plans areas of "safeguarded land between the urban area and the Green Belt in order to meet longer term development need stretching well beyond the planned period" and "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development".

The safeguarding process is therefore to be used "where necessary" and such land should only be developed after a further review of the local plan. There is a strong argument for leaving such land in the Green Belt until a valid need to develop it is identified.

The Council's proposals are over reliant on a 2016 Report on the Green Belt which should be reconsidered before moving to the next stage of the local plan and should be based on the Landscape Institute Methodology for Assessing Landscape Character accepted as the industry standard.

The National Planning Policy Framework at paragraph 84 states that when reviewing Green Belt boundaries consider... "channelling development toward s urban areas inside of the Green belt boundary ...or locations beyond the Green Belt". Removal of the Green Belt should only be consider in exceptional circumstance0s which have not been demonstrated.

Yours faithfully

