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**RE: Warrington "Preferred Development Option" Regulation 18 Consultation**

Dear Sir/Madam

I wish to object/comment to the current Preferred Development Option. Please find below my response.

**1. Housing Need.**

The housing need stated in the PDO is significantly larger at 839pa than WBC's own revised figure of 679-739pa which was published in May 2017. This larger figure was then used in the Economic Development Needs Assessment (EDNA), therefore the assessment must be significantly over estimated.

There has been double accounting within the figures in that jobs created by WBC's aspirational dreams will be filled by those occupying the new housing. These extra jobs, if they ever occur, are not then a reason to increase the housing supply still further.

WBC have chosen to use only the data which points to more housing required and ignored any contrary evidence, eg. Their own surveys, the effect of Brexit, the pipedream that is HS2/3, job growth etc etc. Hence calculations are seriously flawed, have misinterpreted guidance/data or is missing altogether. The conclusion is that WBC's housing target is one of aspiration rather than an evidenced requirement.

In publishing the plan to developers in 2016, WBC have not taken into account the latest Government advice on housing development. The latest whitepaper on 'fixing the broken housing market', currently out for its second consultation, sets the calculations local governments should use for Housing Need. They use ONS figures which are more realistic and take into account falling net migration. This would then put the requirement at between 14 and 17k homes, with the larger figure being an absolute maximum (as it is set by a 40% increase on the previous adopted plan). These homes could then fit on brownfield sites across the borough rather than removal of the precious greenbelt which could never be regained.

In addition, the number of brownfield sites considered is not exhaustive so leaves many areas not reviewed or considered properly. A good example is Fiddler's Ferry (must close by 2025) which will become available during the first 10 years of the plan but is not considered.

It would appear WBC has also allowed the developers to dictate with regard to the types of development being considered. For example 'Port Warrington' allows for considerable commercial development in the centre of town. This would bring large volumes of traffic (commercial/Heavy Goods and private) onto the centre's road network, right where the roads are busiest. If WBC considered more housing alongside public transport schemes in such areas, they would help alleviate some of the need and avoid choking Warrington further. It is appreciated that Peel Holdings have plans to open up the canal to commercial traffic, but this should not be done at the sacrifice of the rest of Warrington and its residents.

Across the borough, the proposed commercial property type will not bring the range of employment required for a wide society mix. The likely job profiles will mainly be in the lower end of the income scale and therefore will need housing of a particular price-range. In the south of the town, this will be a particular problem as the developer will ensure the house prices remain high and therefore people will need to travel for employment.

I would also like to refer to the Mike Fox's (Government Inspector) report into WBC's Local Plan Core Strategy in 2014. In this report the housing need to 2027 was calculated at 500dpa . . .all of which could be met by brownfield sites.

I quote "...Warrington should supply 500dpa. Therefore the plan, subject to all the proposed main modifications is consistent with meeting the full housing needs of Warrington over the plan period, having regard to the considerations that I have addressed above".

The considerations included representations from planning consultants stating 1100+dpa was required. Here the inspector explained why such figures were excessive. Is it just co-incidence that these figures have re-emerged in the 2017 PDO?

Finally, the plan has been set over 20 years, contrary to standard practice. By doing this WBC can extrapolate already exaggerated data for a longer period in an attempt to justify more building and greenbelt release. In the current climate (Brexit/economic uncertainty), it would be much more prudent to use a 10 or 15 year base alongside more accurate forecasts.

#### In summary:

The plan is not deliverable. WBC have not calculated the housing need correctly. They have ignored their own figures, Government & Inspector's advice and appear to be following what private developers have requested. The plan appears to be written not to satisfy the housing need but to an aspirational need to become a 'city'.

There is no justification for the plan's length, when a 10 or 15 year plan would be more suitable.

## **2. Greenbelt**

WBC appear to want the development of the greenbelt at all costs, rather than demonstrating any exceptional circumstance. The PDO explores the option which appears to give the developer maximum profit, the reasoning perhaps to get private enterprise to pay for any infrastructure required to 'unlock' land. This is likely why the plan is 20 years, yet WBC want to release all the land from greenbelt immediately rather than in any phased manner. This will hand over control to the developer who will 'land bank' and build according to their program for maximum profit.

Again, referring to Mike Fox's report, Paragraph 46 stresses the importance of the greenbelt to the Government and that exceptional circumstances are needed to be proven before any boundary alterations. Indeed he advises that WBCs policy CS4 affirms commitment to this. Therefore the PDO is in a sharp contradiction to WBC's own policies!

To justify their approach WBC have commissioned a Greenbelt Assessment by ARUP. Frankly, this report has no credibility and even has a disclaimer at its heart - that it should be not used by 'third parties'. It is not signed and does not have anyone taking responsibility for its content (or their qualifications/experience). It uses inconsistent, insensitive and incomplete approaches in coming up with a 'weak' assessment for most areas.

In addition there is no consideration of the amenities and conservation areas that would be lost, and the villages and towns of South Warrington that would merge into one. It would appear that it was written with an end result in mind rather than to correctly assess the areas in question.

I refer you to the 'Regulation 18 Consultation July 2017: Clients' Response' which was written by Harry Shipley & commissioned by residents of South Warrington for more complete detail regarding the Greenbelt assessment.

In summary:

WBC have not demonstrated the exceptional need to remove or develop any of the greenbelt (as required under NPPF paragraph 83). WBC are not following standard practice in their assessment of the greenbelt and appear to be driven to its development.

### **3. Traffic & Transport**

Warrington already has heavily congested roads, indeed WBC's own documents state as such, (ie The LTP Strategy and even the PDO). The situation is only going to worsen with the expected 4% increase caused by the Mersey Gateway Toll Bridges and general increases in car use.

Compounding this is the fact that the motorways surrounding Warrington are also at capacity and therefore cannot handle any real increase in traffic. Indeed, the Highways Agency have already written to WBC stating this is a major issue and yet WBC have not proposed or funded any improvement to the motorway network.

Within the PDO there are some ill thought out road schemes which are funded by private investment and therefore cannot be delivered until year 15! This cannot be sustainable for the development life cycle.

The public transport schemes described within the PDO are all bus routes and will obviously use the road network adding further burden. The routes given within the south of town are not deliverable due to the levels of congestion around the canal crossings and that no improvement will be made to the network until year 15.

The proposed canal crossings are woeful in concept and cannot deliver the required improvements needed for the plan. These proposals include use of the Trans-Pennine Trail and subsequent CPOs, none of which is viability tested or costed and appears to be totally unfunded.

To be able to assess the situation better, a full multimodal transport model is required. This would demonstrate not only the required highway improvements but also the way an additional 62,000 people (2.3 per household) would be expected to commute around the borough. By neglecting to provide such detail, WBC have not followed their own policies or good practice and it renders the plan undeliverable.

The PDO relies heavily on road transport (mainly private car). By WBC's own figures 60% of measured sites already exceed targets for harmful air pollution. The trend is only rising and will continue to get worse with increased congestion (by the Mersey Gateway for example). Warrington already has the 2<sup>nd</sup> highest pollution figures in the North West of England. 27,000 new homes will bring 35,000 cars onto Warrington roads and with many using Warrington as a dormitory town, it can only be concluded that during the life of the plan Warrington will exceed all air quality targets. This will result in more than the 4.8% of deaths currently attributed to Warrington's pollution. Within the PDO there is no mention or strategy on how this will be improved.

All of the above does not include the loss of Warrington's 'green lung' – perhaps giving all who live in this area a 'double-whammy' of increased pollution without the green space to counteract some of it!

I also refer you to the 'Regulation 18 Consultation July 2017: Clients' Response' which was written by Harry Shipley & commissioned by residents of South Warrington for more detail regarding the Local Road Network & Public Transport.

In Summary;

The PDO contains very little on how the people of Warrington will commute for work or pleasure. There are some smaller considerations which will simply shift bottle-necks rather than assist with traffic flow. Public transport centres solely on new bus-routes, further choking the road network. No infrastructure improvements appear to have been funded or in some cases even considered (Motorway traffic) and there has been no multimodal transport assessment. The PDO will only worsen Warrington's already poor air pollution.

The PDO is therefore undeliverable and unsustainable.

#### 4. Deliverability

WBC must follow the criteria set out in the National Planning framework (NPPF) when preparing a local plan.

Paragraph 173 of the NPPF is entitled "Ensuring viability and deliverability";

"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".

Paragraph 177 continues . . .

"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 in the previous sections of this report, the Council 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.

In summary;

The NPPF details that WBC must demonstrate the deliverability of the plan. WBC have completely failed to do this (some reasons given in previous paragraphs) and they have also failed to demonstrate how the infrastructure required will be funded.

## 5. Consultation Process

I have been surprised by WBC's total lack of sensitivity regarding the consultation. It would appear that there was initially a deliberate ploy to have a consultation of which only a limited number had knowledge and therefore restrict the number of replies. WBC failed to follow Government and their own guidance/promises on consultations.

- Public consultation without adequate advertising and held throughout peak holiday season & parliament recess.
- A refusal to extend the consultation despite requests from MPs, Local Councillors & the public. (later, a small extension was subsequently granted, but only to fall in line with the time period allowed for Parish Council Responses).
- Public consultations occurring in the least controversial areas (little in the south & none in Grappenhall/Thelwall).
- Council representatives have been unable to answer even the most basic of questions. Stock answer 'Its just a plan'.
- Use of outdated and unclear maps when presenting plans at the public consultations.
- Conflicting answers have been given to the same questions asked at different public consultation meetings and even by other WBC representatives in the same room.
- Deliberately misleading answers to questions. The subsequent impression is that WBC gave answers depending upon the audience.
- When the public became more aware and began 'spreading the message' the council reacted by calling those individuals "Scaremongers" in official correspondence. What do the council have to fear from the public?
- The use of semantics to deny points within the plan. For example; WBC's insistence that 'There are no plans to build a road on the Trans-Pennine Trail' despite it being clear on maps within the PDO. WBC could argue they were correct as there are no *planning permissions* in place for a road on the Trans-Pennine Trail. However this is just a play on words in an attempt to mislead the public.
- Worthy of a mention is the newspaper article in the Warrington Guardian with Andy Farrall. In it he declared that there are no plans for Warrington to become a city. Yet throughout WBC's website and official correspondence the town is referred to as, or working toward, becoming a New City. Indeed the PDO states as its main aim (W1) as being "To enable the transition of Warrington from a New Town to a New City". Much of this documentation was written by Mr Farrall and/or his team, how can he then deny it? Perhaps Mr Farrall was meaning that Warrington are not (at the moment) officially applying to become a city? However this, again, is a play on words and, it would seem, an attempt to deliberately mislead. This is not behaviour I would expect of someone in in his position.

I look forward to your response and confirmation that my legitimate objections have been properly considered and addressed in any subsequent plan.

Yours faithfully

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