

From: [REDACTED]
To: [Local Plan](#)
Subject: Local Plan
Date: 16 June 2019 22:38:44

Dear Sir/Madam,

Please find my comments on the local plan;

Warrington's Local Plan - Proposed Submission Version ('the Plan') is based upon a premise of huge growth. This growth derived from local trade bodies (eg 'Warrington & Co' and the Local Enterprise Partnership) who have vested financial interests in over inflating such predictions. In addition, despite the government guidance setting a 15 year plan period, the plan is projected for the next 20 years. The figures used in respect of housing numbers are from the housing requirements given by the ONS in 2014. This is despite ONS publishing revised and much lower figures in 2016. Whilst the government has advised that the 2014 figures are the current baseline it has also advised that the housing need is NOT a target, more of a starting point. It is clear that the housing needs requirement for Warrington is trending downwards and the 2016 ONS statistics demonstrate this. Since 2016 the economy has been under significant pressure which is likely to continue as the country navigates through BREXIT. It would therefore seem reasonable to not to add the multipliers for growth at all and bring the level of housing required to a much more sustainable level.

Using a 20 year plan against such uncertainty allows an already over inflated target to be multiplied and, with unnecessary contingencies added, it becomes a figure which is totally unjustified and unsustainable.

It would seem more sensible to re-evaluate the plan with a 15 timescale and review, say, every 5 years. If then applied with the over inflated 2014 figures this would reduce the housing demand to a level of circa 13.5k (using WBCs inflated growth figures) or 8k (with 2014 baseline). Then using a brownfield first policy would likely mean that the greenbelt would not be needed until the very end of the plan. However it is likely that housing demand would fall and with more brownbelt land becoming available all the time (eg. The Fiddler's Ferry site) the greenbelt would not be needed at all.

As Warrington Borough Council (WBC) have not taken such a pragmatic approach it would appear that have a different motive and it could be argued that they are being 'developer led'. This view is further supported by the plan calling for the greenbelt to be released immediately the plan is adopted. This is not a 'brownbelt first' policy and goes directly against NPPF, government and political guidelines and of course public opinion.

In terms of housing supply, WBC has a housing delivery record of circa 350 houses PA, with a peak of approx. 550PA. This is for a number of reasons but it is not one of land supply. Developers will only build houses that they know they can sell for the maximum profit. Hence, developers will only want to build in the areas and at a rate of their choosing. In effect they will land bank as it in their interest to do so. During the Plan period the housing supply varies but peaks at nearly 1700PA. It cannot be sustainable that WBC could control the building of houses at THREE times their previous average and peak build rates. It is also not sustainable to expect that developers will build the number of houses or in locations as dictated by WBC as this will not be profitable.

In short, WBC's projected growth, plan period and build projections are unjustified, UNSOUND and UNDELIVERABLE.

The Greenbelt should not be developed unless exceptional circumstances are proven. WBC's justification appears to be that they predict town centre growth. Whilst this is inevitable over

time, for reasons already described I do not believe the area will grow at anything like the rate described in the Plan. A more pragmatic approach, reducing the plan term and regular review, would mean that the greenbelt would not be required at all.

The proposed developments on the South of Warrington are huge in scale and will change the character of the settlements beyond all recognition. Many of the infrastructure issues have been present for decades and what is installed is already at, or over, capacity. For such developments to be approved it would require significant initial investment to develop the right kind of infrastructure to service the area. Without this the Plan is undeliverable. The Plan and the Local Transport Plan (LPT4) should give detail on how this will be designed, funded and implemented. Unfortunately this detail is missing from both documents and what remains is a wish-list of ideas from which it is impossible to determine the viability of any proposed development. Trying to gain further information on both the Plan and LPT4 was difficult. Officers could only answer with 'it's only a concept', 'purely illustrative' or 'we will be firming that up over the next five years'. It is totally unacceptable that WBC would instigate a plan without a clear and robust framework for the proposed development. It is also not acceptable to deliver such a framework years after the Plan has been implemented when it is clear that infrastructure is required in advance of development.

The proposed employment development areas in the South form part of the plan yet the developers are already applying for planning permission for these areas (eg Stobarts and Six:56). It is clear from their plans they are not willing or able to fund any significant infrastructure improvements for the estimated additional 24000 vehicle movements per day. Add that to 34k cars from the Plan's proposed 24k houses, gridlock and yet further deterioration in air pollution are the obvious outcomes. As LPT4 offers nothing more than a wish-list of ideas and therefore is UNDELIVERABLE, it seems that the policy of the plan can only be based around use of the motor vehicle. This is not sustainable for a town with already the WORST pollution in the country, where the local MP is calling a 'climate emergency' and for a country aiming for zero net carbon emissions by 2050. Putting more vehicles on overcrowded roads and removing the Greenbelt does not sit well with the aims of the area or the country.

By releasing Greenbelt at the start of the plan, WBC and the people of Warrington will lose total control of development within the area. I assume that WBC consider this a good idea as they may get 'section 106' money earlier, allowing WBC to retrospectively install infrastructure. This is a VERY risky strategy. As mentioned earlier, developers will control what gives them maximum profit and deliberately hold back monies until the last moment. WBC, as do all local authorities, have a very poor record of recovering moneys as developers have a very good record of not delivering as expected. The experience of WBC at Chapelford gives us a recent example of poor infrastructure delivery and developer delays. It should also be pointed out that retrospectively installing infrastructure would put incredible and unjust strain on the whole of Warrington's roads, motorways, doctors, schools etc and blight communities.

As mentioned in Stockton Lane's submission for the PDO. There are serious doubts about the quality of the greenbelt assessment completed by ARUP which is still relied upon for the PSV. The report appears to have been written with an end result in mind in an attempt to weaken the greenbelt's case. The issues with the report are, (a) The status and accountability of the report (b) The insensitivity of the Arup methodology (c) Inconsistent results within the Arup reports (d) An incomplete process of greenbelt assessment. I urge WBC to read again the attached report and conduct a much more thorough and accurate assessment.

I would also like to point out that throughout the process my opinion is that WBC have attempted to conceal and circumvent due process. The original plan for Warrington did not include for such wholesale development or greenbelt destruction. This plan was dismissed on a technicality by the Inspectorate (not due to housing numbers). Therefore, when WBC published the updated version (known as the PDO) it was expected to have only minor revisions. This was not the case and WBC knowing the controversy that would result, sort to publish and consult over the minimum time period, during the holidays and when the parish councils were in recess. Despite this, and unprecedented 4.5k individual responses were returned, which included very

negative responses from all the Parish Councils of the South. There followed a period when WBC had the chance to consider the responses and incorporate into the plan as appropriate. It would appear that WBC have not taken these responses into account as apart from minor cosmetic changes the Plan (PSV) remains unchanged. The Plan should cover what the town needs in terms of development and how this is implemented in the best interests of the public as a whole. The Plan (PSV) has been universally condemned by residents across the North and South of the town. The local MPs and prospective MPs have all publicly spoken out against it and the Parish Councils of the South are spending tax-payers money fighting it. The question therefore is 'who is the plan serving and why'?

In Summary;

The plan is based upon unrealistic projections of future growth and therefore is UNSOUND and UNDELIVERABLE.

NPPF and government policy on the Greenbelt is not being followed and therefore is UNSOUND and UNDELIVERABLE.

The number of houses proposed is without precedent and WBC will not be able to manage developers or developments of such scale and therefore is UNSOUND and UNDELIVERABLE.

The infrastructure required for developments of this scale has not been designed, costed or funded and therefore is UNSOUND and UNDELIVERABLE.

LPT4 itself is UNSOUND, rendering the Plan UNSOUND and UNDELIVERABLE.

He greenbelt assessment used to support the Plan is UNSOUND.

The already crippling Air Pollution will be exacerbated by the plan and therefore is UNSOUND and UNDELIVERABLE.

The outcry across the borough is likely to lead to political unrest and hence it could well be that the next Council has a different make up with little support for the plan. Changes are an inevitable and therefore the Plan is UNSOUND and UNDELIVERABLE.

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