

# Response 737

## Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

## PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: Howard Butcher

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

Contact details	
Organisation name (if applicable)	-
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	[REDACTED]
Postcode	[REDACTED]
Telephone number	-

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

If a paragraph or policy sub-number then please use the box below to list:  
See attachment

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant		X
Sound		X
Compliant with the Duty to Co-operate		X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

See attachment

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each). If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'. If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Objections to local plan 2019 - [REDACTED]

You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)

Howard Butcher

Email: [REDACTED]

16<sup>th</sup> June 2019

## **Objection to Local Plan**

### **Legally Compliant - No**

The Proposed Submission Version Local Plan 2019 documentation contains throughout terminology and language that a planning expert could be expected to fully comprehend but is inappropriate for the average citizen to understand. There is also a widespread failure to provide a full and complete list of explanations for acronyms. This constitutes an undue advantage on the side of developers who will employ the use of professionals in the submission of their technical documentation.

The Brownfield Register on the WBC website is from June 2017. Local planning authorities are required to review their registers at least once a year but there is no up-to-date brownfield register. This is almost 2 years old so the council appear to have breached this requirement. This constitutes a failure to provide full supporting evidence that can be used in favour of objecting to the plan.

### **Sound - No**

The figures derived for housing need are based on flawed and contradictory advice from Central Government making the whole local plan fundamentally flawed from the outset and therefore wholly based on unsound evidence.

<https://www.gov.uk/government/collections/household-projections> – clearly states “Household projections are trend-based and indicate the number of additional households that would form if **recent demographic trends** continue.” Contrary to that statement, the instructions from Central Government encourage the use of out-dated 2014 figures instead of more **recent** 2016 figures. This appears solely for the biased purpose of meeting the ‘Government’s objective of significantly boosting the supply of homes’. Recent demographic trends - fertility, mortality and net migration have all shifted significantly downwards since the Brexit vote in 2016 – a recent trend that is being totally ignored.

In addition, the advice at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#history> – clearly provides local councils the flexibility to use their own formula by stating, “Is the use of the standard method for strategic policy making purposes mandatory? No”.

**“5. Delivering a sufficient supply of homes -**

**60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance**

*– unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”*

The step change caused by Brexit to both the economy and migration has created exceptional circumstances which fully justify an alternative approach to that encouraged by Central Government. However, Warrington Borough Council appear to have ignored this flexible option without offering any sound reason. This has resulted in grossly overestimated figures of future housing need.

Strong factors in favour of Warrington Borough Council justifying an alternative approach to their local plan are:

a) House price growth having fallen to a six year low: <https://www.bbc.co.uk/news/business-47960657>

b) The Office of National Statistics having confirmed that life expectancy in the UK has stopped improving: <https://www.bbc.co.uk/news/health-45638646> and <https://www.theguardian.com/society/2019/mar/07/life-expectancy-slumps-by-five-months>

c) Predicted growth figures which are largely influenced by net migration figures being strongly hit by the seismic change caused by Brexit

All of these factors now render previously compiled figures useless and Central Government instructions to use 2014 figures should no longer be regarded as a sensible course of action.

The proposed Warrington local plan figures also fail to acknowledge a natural trend in that, where a town's population is expanding, the living capacity of existing housing is also increased as home owners know there are more cost benefits to expanding their own property rather than purchase vastly more expensive new build housing. There is clear evidence of this across the UK, best shown in London and the South East, where larger properties are split into smaller multiple abodes, or an existing homeowner may extend their property (e.g. at the rear, loft conversion, garage conversion, roof extension). No mention is made of this common trend in the local plan or figures gathered which would decrease any overall new build housing target need.

There is also no figure for the expected number of current residents who will wish to leave the Warrington area as a direct result of the adverse impact that these plans will have on the quality of living in the area, with poorer health conditions from increased pollution, even more stress on already strained services.

There appears to have been a neglect of the need to prioritise brownfield sites over greenfield sites. The Brownfield Register from 2017 shows 130 independent sites, totalling 230.54 hectares with space for a minimum of 7342 dwellings. This evidence clearly shows that there is no immediate need for building on Green Belt land ahead of fulfilling the regeneration of Brownfield land. The current plan offers fails to provide any sound justification why exceptional circumstances mean that Green belt land is being given priority over these brownfield sites.

Proposals for the Burtonwood area are being driven by a development company Northern Trust that has acquired much land around the village and has no interest in the area other than to destroy its beauty for financial gain. Northern Trust documentation included 'The Burtonwood Housing Market Assessment September 2012' conducted by Arc4 on behalf of Northern Trust (copy can be found here <https://www.warrington.gov.uk/download/downloads/id/13591/r18-085.pdf>). The 2012 information is woefully out of date. A housing survey conducted in 2012 was 4 years before the Brexit referendum result and before the arrest of life expectancy rates. It was at a time when the

credit crunch lag effect from London and the South East had not even rippled through to the North West. Therefore, none of the predictions for future housing need contained in their proposals can be considered credible of the situation in Burtonwood neither today nor in the next 20 years.

There appears to be no sound justification for removing the site chosen in Burtonwood from the green belt. The document “Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) July 2017” assessed the sites closest to the village of Burtonwood as all having a moderate contribution to the greenbelt. There were two sites to the north west of Collins Green which were assessed as having weak contributions to the greenbelt. It is inconceivable why the council would now favour a site that makes a better contribution to the greenbelt over sites which were previously assessed as making weak contributions.

Furthermore, the [Warrington Borough Council Green Belt Assessment Final Report](https://www.warrington.gov.uk/.../green_belt_assessment_final_report_oct_2016pdf.pdf) - [https://www.warrington.gov.uk/.../green\\_belt\\_assessment\\_final\\_report\\_oct\\_2016pdf.pdf](https://www.warrington.gov.uk/.../green_belt_assessment_final_report_oct_2016pdf.pdf) acknowledges, “23. The NPPF endorses the permanence of Green Belts as an essential characteristic (paragraph 79) and stipulates that: “Once established, Green Belt boundaries should only be altered in **exceptional circumstances**”. All pockets of land around Burtonwood were assessed in that document as making either a strong or moderate contribution to the greenbelt. No sites were assessed as making weak contributions. If ‘exceptional circumstances’ are to be applied and justified, then priority ought only to be made to sites making weak contributions, not prioritising the building on sites making moderate or strong contributions to the greenbelt.

In 2015, the The Appendix 1 Site Proformas for [Burtonwood & Winwick \[pdf\]](https://www.warrington.gov.uk/download/downloads/id/9702/burtonwood_and_winwick_site_proformaspdf.pdf) found here: [https://www.warrington.gov.uk/download/downloads/id/9702/burtonwood\\_and\\_winwick\\_site\\_proformaspdf.pdf](https://www.warrington.gov.uk/download/downloads/id/9702/burtonwood_and_winwick_site_proformaspdf.pdf) clearly stated that the site now chosen for building on was not suitable, was in the green belt and 0 deliverable dwellings would be created up and until 2030.

It is further evidence that the current local plan contains fundamental contradictions against previous assessments of the same parcels of land.

The selection of the site in Burtonwood appears to have been based on evidence which ignores the current usage which is agricultural. Other sites not selected appear to have been given a higher grading purely based on durable and non-durable boundaries even though their usage is less beneficial to the economy and local farming jobs.

The proposed plan offers no evidence as to the affordability of new houses in line with salary levels of expected employment opportunities. The only evidence of any viability appears to come from the side of the Developer Northern Trust who has indicated a higher number of housing would need to be built to make the plan in Burtonwood viable from their point of view. If only the view of the developer is taken into consideration, then this is a recipe that will result in housing which is too expensive for those living and working in this area which largely offers low paid factory employment.

Building at the northern side of Burtonwood conflicts with the aims of the Transport Plan as it will mean building further away from where new employment is planned. This will generate more traffic through the centre of the village, longer journeys, more pollution, a higher carbon footprint and more traffic jams. Building closer to the centre of a town where public transport can be concentrated and is closer to employment ought to be the preferred option as it provides for more efficient and shorter journeys.

There are only vague mentions of infrastructure improvements to the village and no mention at all of any secondary school provision meaning even more transportation of school children in that age bracket.

The Plan appears to suggest building work will proceed ahead of any infrastructure improvements: '10.5.1 Land to the north of the inset settlement of Burtonwood bounded by Phipps Lane, Green Lane and Winsford Drive will be allocated for residential development, providing for a minimum of 160 new homes. The development will provide a high quality residential setting with ease of access to existing local services and facilities in Burtonwood and employment opportunities at Omega/Gemini. 10.5.2 Development is expected to come forward quickly upon adoption of the plan. This means the first homes are anticipated to be completed in 2021/22, with the development completed in full within the first 10 years of the plan period.'

However, the Infrastructure Delivery Plan states that the only infrastructure improvement close to this site is for a contribution to enhance Burtonwood Primary School. The cost is £2,612,190 but no funding is yet secured and at any rate is only proposed as a "Medium Term (2023-2028)" so at a time after the building work will have been completed. This effectively confirms that no funding is secured for infrastructure improvements and, even if it was, building will go ahead before any infrastructure improvements are scheduled to take place. This shows a clear intention to start building before or regardless of whether any infrastructure improvement happening at all.

As an outlying village, Burtonwood expansion will add a high number of extra vehicles per household on the roads. There does not appear to be the infrastructure in the area to absorb any extra population increases. The trains are full with commuters standing each day, the M62 is blocked every morning and even the smart motorway will not change the daily blockage at the junction of the M6 and M62 motorways, whilst the A49 already makes for a frustrating experience getting in and out of the town centre. Warrington residents do not agree with the overly aggressive expansion plans for business and population as specified in the so called 'preferred option'. The councillors seem deaf to what people in the town are saying and the rate of growth seems to be spirilling out of sensible control and ahead of any foreseeable timeline for infrastructure improvements.

Nowhere in the Infrastructure Delivery Plan is there mention of improving medical provision in Burtonwood. There is already a shortage of health facilities in Burtonwood as acknowledged in the 2017 - [Settlement Profiles - Outlying Settlements \[pdf\]](#) document at [https://www.warrington.gov.uk/info/201368/local\\_plan\\_review/2347/local\\_plan\\_review\\_-\\_supporting\\_documents](https://www.warrington.gov.uk/info/201368/local_plan_review/2347/local_plan_review_-_supporting_documents)

which states:

"Health facility -

There are no GP practices which are commissioned via Warrington CCG in Burtonwood. There are two 'branch' implications surgeries which are commissioned from a St Helens surgery and these are currently operating at capacity. The incremental growth option would put a strain on these existing 'branch' surgeries. There is no potential to expand either facility on their current site and therefore an alternative solution to provide additional capacity would need to be found within Burtonwood."

It is imperative to increase medical facilities before any more housing is added to this area as it is already very difficult to get an appointment to see a GP without any more increase in load.

In 2015, the The Appendix 1 Site Proformas for [Burtonwood & Winwick \[pdf\]](#) found here:

[https://www.warrington.gov.uk/download/downloads/id/9702/burtonwood and winwick site prof ormaspdf.pdf](https://www.warrington.gov.uk/download/downloads/id/9702/burtonwood_and_winwick_site_prof_ormaspdf.pdf)

clearly stated that the site now chosen for building on was not suitable, was in the green belt and 0 deliverable dwellings would be created up and until 2030.

It is further evidence that the current local plan stands out as a fundamental contradiction in view of all previous assessments of the same parcels of land.

### **Compliant with the Duty to Co-operate - No**

The 9 week consultation period has been insufficient. The reasons for this are -

a) Warrington Borough Council is bordered by a high number of other local councils (7 in total - St Helens, Halton, Cheshire West, Cheshire East, Trafford, Salford and Wigan). For the average person in full-time employment, 9 weeks is far too short a period to fully be able to consider the Warrington Borough Council plan in relation to the duty to co-operate with all the other neighbouring councils. It has been impossible in that time frame to read the local plans and supporting evidence of all 8 councils. Therefore my objections have had to be limited to just reading some of Warrington Borough Council's and some of the St Helens Borough Council's plans and supporting documentation which leaves my objections far short of what they would have been had adequate consultation time been provided. Consideration ought to have been given to the high number of neighbouring councils and extra provision added to the 9 week period to compensate for the additional work required in assessing the documentation of all 8 councils.

b) There have been a large number of fundamental differences between the initial Preferred Development Option document from 2017 and the draft plan document in 2019 such as changing maximum amounts of housing need to minimum figures. This has meant there has been no overlap in knowledge gained from having read the initial document so assessment of the 2019 document became a completely new start from scratch.

In the Burtonwood area, the quality of consultation has been very poor. Many residents have complained at not receiving any letters or information at all. I did receive a generic letter but with no personalised address I questioned its authenticity.

Burtonwood is situated very close to the St Helens council boundary and, as evidenced above, many services are currently shared and at capacity. St Helens also have a local plan with 2988 new houses at Bold within a short distance to the west of Burtonwood. St Helens council also have housing and employment areas planned south of Newton-le-Willows (figure 4.1 at <https://www.sthelens.gov.uk/media/9525/local-plan-written-plan-web.pdf>) absolutely on the northern edge of the Warrington boundary. This evidence suggests little co-operation has taken place with St Helens council at an appropriate level of detail to ensure adequate infrastructure is in place ahead of further expansion in development, nor the adequate retention of green belt land to retain enough space between neighbouring towns.

The Preferred Development Option - Consultation (July 2017) stated maximum figures for housing numbers, for example – Figure 9, Page 47 stated ‘Burtonwood **Up to 150** new homes through Green Belt release’. However, the Proposed Submission Version Local Plan, Page 33 now shows ‘Burtonwood – **minimum of 160** homes’. Changing the wording of the figures from a maximum figure to a minimum figure not only gives carte blanche to building an unlimited number of homes in future including in green belt land but also shows that 4,500 expressions of concern to the original Preferred Development Option appear to have been completely ignored and a breach of the

duty to co-operate with all stakeholders. It also makes a mockery of the whole plan as opening it up to infinite possibilities is no plan at all. The wording must return to maximum figures to make it credible.

The Public consultation has not been adequate enough. The majority of Burtonwood people attending a meeting in May 2019 at the local Catholic Club were unaware until this second stage of the local plan's existence. Nothing has been posted on lamp posts to inform community and there has been a false assumption that people have online access, which is especially not the case with elderly residents.

The housing growth figures of the Warrington local plan are said to be based on the 'developments **needs**' of the town. These are not needs. These are rather more the development aspirations held by a council that wishes to turn Warrington into a 'new city' and are not aspirations shared by many of the residents that the council are supposed to be representing who are being ignored.