

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Subject:** Representation Re Warrington Local Plan Proposed Submission Version (PSV)  
**Date:** 14 June 2019 21:46:32

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Dear Sir

Please find outlined below my representation regarding the PSV. I object to the PSV on the grounds that it is not sound in many areas and I have significant doubt about its deliverability.

In addition, in my view the LTP4 is seriously lacking in detail, does not clearly support the PSV and therefore my ability to make detailed observations on the LTP4 are compromised.

## **1. Introduction and Overview**

In my view the PSV should demonstrate that it has adopted a big picture approach considering all options and that in doing so it has achieved an appropriate balance between sustainability and growth. I find that it is overly reliant on over optimistic forecasts of economic growth and population growth and does not give sufficient consideration to sustainability of the existing character and distinctiveness of existing villages especially those in South Warrington.

1.1 The growth assumptions in the PSV are based on earlier studies for Warrington Means Business and also the Strategic Economic Plan issued by the Local Enterprise Partnership (LEP). These were both undertaken by organizations that can be recognized to have a vested interest in forecasts that maximize growth potential. These growth assumptions are therefore likely to be driven by desire for profits rather than based on the requirements and needs of the existing population. The existing residents are likely to struggle to identify the benefits targeted at them compared to the more obvious benefits arising for developers.

1.2 It is clear that for these reasons these growth assumptions may be too optimistic and their soundness must be challenged not only when compared to actual achievement in the recent past since the financial crash in 2008 but especially in the light of the potential negative impacts on the national economy and local growth arising from Brexit.

1.3 In addition the PSV ignores the potential re-use of the Fiddler's Ferry site. This position has been justified in the PSV on the grounds that the decision on closure by SSE was uncertain and that it would be difficult to gain clarity on how long it might take to decommission and decontaminate the site. This is a massive brownfield site of some 330 hectares and its exclusion from the plan should not be accepted as it would offer an alternative to the use of large tracts of existing Greenbelt. Importantly since the publication of the PSV, SSE have very recently announced that it will close the Fiddler's Ferry site by March 2020. Clearly this decision means that this large tract of land should be incorporated into the PSV and the PSV is not sound if it excludes it.

1.4 The threat of Climate Change over the PSV 20 year period does not appear to have been taken into account either in the underpinning assumptions or the proposed responses set out in the PSV or LTP4. The UK Government is committed to IPCC objectives as an important means to achieving IPCC targets it has recently announced a carbon zero target for the UK by 2050. Furthermore Birmingham City Council have been more ambitious and on 12 June it announced its target to achieve carbon zero by 2030. Undoubtedly other City and Borough Councils including Warrington Borough Council will need to announce their own carbon zero target date in the near future and this will very likely be within the PSV period.

1.5 The PSV should be revised to include careful consideration of the impact on carbon emissions arising from a plan to build 18,900 houses and build new economic developments focused on logistics with many thousands of HGV movements per day and how these can be made consistent with UK wide and local targets for carbon zero. In addition there is an objective to plant a Northern Forest and the PSV should address how WBC will contribute to this initiative.

## **2. PSV Plan Period and Growth Assumptions**

2.1 UK Government guidance requires a minimum 15-year plan period. The PSV has chosen to cover a 20 year period (2017 to 2037). This is 2 years further into the future than necessary, thereby artificially increasing the total home build target. Furthermore it would seem unwise to create a Plan duration longer than necessary given recent history of uncertainty including 2008 financial crash and Brexit vote in 2016 and impending Brexit withdrawal from EU.

2.2 In respect of housing supply the PSV utilizes the Government formula for guidance on house build requirements and data from 2014 to produce a reference figure of 909 new homes annually over the chosen 20-year period. In fact the PSV proposes with little justification an even higher annual average figure of 945 homes. It is then somewhat illogical to apply this forecast requirement figure retrospectively to 2017, 2018 and indeed to the current year 2019. It is certain that none of these three years can achieve building 945 homes and therefore commencing the plan in 2017 creates an artificial backlog of approximately 1700 homes by the time the Plan might be adopted in 2020.

2.3 Attempting to recover this artificial backlog results in artificially high annual targets of 1550-1650 homes for several years. 1600 homes in a year appears to be quite unrealistic compared to actual annual build over the past 10 years (peak figure achieved of 545). The current economic climate is quite different to that of 2001-2007 before the financial crash and are likely to be undeliverable given the capacity of the building industry. As the local Plan is to be reviewed every 5 years the concept of building in 10% additional flexibility is not required and creates potential negative consequences for early decisions that might not be recoverable in the longer-term future. These assumptions in the PSV are not sound.

2.4 If the PSV period were reduced to 15 years, commencing in 2020 and recognize actual figures for build achieved in 2017, 2018 and likely for 2019 then application of the Government guidance figures of 909 per year would result in a revised total target of 13,535. This is some 5,400 below the PSV figure of 18,900.

2.5 Another important consideration is that House builders will only build houses if they believe they will be sold. On the other hand these will seize upon any opportunities to purchase existing Green Belt and add it to their landbanks increasing their asset value and create value for their shareholders. Given the figures for recent years on sites in the Warrington borough already given planning permission the rate of build by the developers is relatively slow (typically 50 per year at each site) it does not appear to be realistic to plan for 1600 homes per annum to be built. The plan in terms of house build is therefore very unlikely to be deliverable and does not justify an upfront decision to release large tracts of Green Belt all in one are of South Warrington.

2.6 Many of the aspects of the PSV are strongly influenced or even driven by the growth assumptions over the 20-year period. As a consequence the PSV concludes that sufficient brown field sites are lacking to achieve the planned for growth and it seeks to release large tracts of Greenbelt to attract the developers who might deliver the growth mechanisms (i.e. house builds and warehouse builds). Given the potential for unrealistic optimism in the growth forecast it is not sound to remove large areas of Greenbelt at the beginning of the 20 year period.

### **3. Green Belt**

3.1 There have to be very special circumstances for Green Belt to be released for development. Whilst a Local Plan should be aspirational it must also be realistic and deliverable. Over optimistic growth forecasts should not qualify as a very special circumstance and the growth forecasts must be exhaustively tested against credibility and deliverability. Before any Green Belt is sacrificed. According to the PSV Warrington will lose 11% of its Green Belt, virtually all of it in South Warrington. Given the uncertainty of the growth forecasts this must be unnecessary as an upfront decision and disproportionately spread across the borough. I consider that the release of Green Belt, if any is really required, should be spread more evenly, in smaller parcels that reflect real need and only as a last resort after all other reasonable options have been examined.

3.2 I consider that the assessment of Green Belt in the PSV is flawed in that it fails to

demonstrate that the Council has investigated all alternatives and wider benefit as per the most up to date NPPF guidelines. In particular NPPF states:

'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations'.

3.3 I consider it inappropriate for the Council to adopt an approach that seeks to circumvent this guidance by proposing the release of large areas of Green Belt and identify them as suitable economic development areas primarily because of their location and presumed current attractiveness to particular types of business (e.g. logistics). The PSV highlights that WBC have adopted this very approach to the land in the south east of the borough adjacent to the M6 and M56 and which has already attracted planning applications by Eddie Stobart (2019/34739) and Langtree (2019/34799). It is worth noting that in a letter to the planners from local MP Mr. Faisal Rashid in May 2019 he has set out his opposition to both of these planning applications and in particular his opposition to the use of existing Green Belt for such large scale developments.

#### **4. Specific Concerns Regarding the Soundness and Deliverability of PSV**

4.1 The location and volume of new homes on a specific site should surely be aligned as far as practicable to where existing jobs are being sustained and new jobs are being created in order to minimize commuting, and furthermore a large proportion of the houses should be affordable in relation to those jobs. This is highly likely not to be the case in relation to the proposed plans for South Warrington:

a). the 1,600 houses in Walton will all be for commuters as there is no new employment in the area.

b). the new jobs proposed to be created associated with the new development area south east of the Garden Suburb are most likely to be distribution and logistics related and if that is the case there is likely to be a significant mismatch between the typical remuneration levels and the anticipated prices of the new houses being built. The staff will need to commute from other areas whilst the 5,000 houses will very largely be populated by people who need to commute out to their places of employment, as there is very little commercial activity in South Warrington.

4.2 The number of houses proposed in Walton would treble the village's population. It is inconceivable that in such circumstances that the character and distinctiveness of Walton will not be severely altered. The plan for Walton is therefore contrary to the 'Vision for Warrington's future' outlined in the Local Plan and I consider that this particular aspect of the PSV is not sound.

4.3 Similarly, the villages of Grappenhall, Stretton and Appleton Thorn will be affected by large scale housing developments built in close proximity and these are forecast to be on such a scale as they will inevitably change each village's character and distinctiveness which is again contrary to the 'Vision for Warrington's future'.

4.4 In line with the 2011 Localism Act, Appleton Thorn Ward has in place a Neighbourhood Development Plan (NDP). Over a period of 3 years the Thorn ward NDP, Warrington's first and only accepted NDP was produced by a joint Appleton Parish Council and Appleton Thorn residents committee with the help of the WBC planning team. This NDP was accepted as a legal document in 2017 after external examination. Many of the policies were concerned with preserving local character, heritage of the area and its valuable green spaces especially surrounding Green Belt. Planning Applications have been made during the first half of 2019, whilst the PSV is still being consulted, proposing to build on Green Belt in close proximity to Appleton Thorn on land covered by the NDP and in one of these Planning Applications the prospective developer argues that the NDP is 'Out-Of-Date' and irrelevant. It is clear that the PSV undermines the Appleton Thorn NDP and as a result encourages developers to declare the NDP both 'Out-Of-Date' and irrelevant to the planning process. I note that the NPPF

states that 'the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits' and furthermore that 'plans should be the key to delivering sustainable development that reflects the vision and aspirations of the local communities'. A new Local Plan that is demonstrably not aligned to a recently accepted NDP cannot be considered sound in this respect.

4.5 Warrington's record on air pollution is poor and Warrington is in the top 5 worst towns in the UK for raised levels of PM2.5 above the recognized limit of 10microg/m3. This is generally a more serious issue close to roads that suffer from queues of stationary traffic with engines running. The PSV will result in large increases in volumes of car traffic, increased turns of the swing bridges over the Manchester Ship Canal and significant impact on the frequency and duration of traffic queues on the nearby roads such as those through Stockton Heath. The PSV will therefore have a significant adverse impact on air quality.

4.6 Future plans for upgrading/replacement of Warrington Hospital are not satisfactorily addressed in the PSV. The Hospital is old and needs replacement either by a new hospital on a new site or on the existing site. In view of the large planned increase in the population the latter option is not credible and therefore a key element of the PSV should be the size and location of a new Warrington hospital together with a target date for its construction/operation.

4.7 The LTP4 is set out as a high level approach to addressing the challenges of the existing transport problems in and around Warrington. Unfortunately it lacks necessary detail in many key areas and frequently describes options and ideas as 'illustrative' or 'conceptual'. This leaves the reader with the feeling that it is speculative and a collection of wish lists without the essential information of cost ranges, timescales and how they can be funded. For these reasons it is easier to comment on what is missing rather than on the options included.

a) The LTP4 does not attempt to address the existing South Warrington highway infrastructure, which is at saturation point at peak times and suffers from significant traffic queues when the swing bridges are turned.

b) The PSV appears to indicate increased ship movements along the MSC and therefore increased numbers of swing bridge turns and more frequent long queues of stationary traffic along London road and through the centre of Stockton Heath. The Latchford/Kingsway gyratory system also suffers from similar congestion at peak times. The LTP4 does not offer any solution to this situation in the short term with most funding in the next 5 years to be targeted at the proposed new Western Link.

c) despite proposals to build 5,000 houses in the new Garden Suburb, there is nothing planned to improve the A49 as it goes north from the M56 junction through Stockton Heath.

d) there is no new crossing of the MSC in Southeast Warrington.

e) previous development in Warrington has witnessed severe problems because the house building has not been adequately supported by timely infrastructure improvements (eg. the Chapelford experience). The vagueness of the LTP4 and the lack of costing information and source of funding are concerns that Chapelford experience may be repeated.

4.9 The LTP4 does not satisfactorily underpin the PSV, and in particular lacks information on timescales, costs and funding. I therefore conclude that the LTP4 reinforces my view that the PSV is not sound and not deliverable from a financial perspective.

In summary I believe that the PSV is not sound because:

- it is based on over optimistic forecasts of growth,
- it does not take account of global factors such as climate change and national initiatives in response (e.g. net zero carbon targets)
- it does recognise the potential use of the Fiddler's Ferry site
- it does not demonstrate that all other options have been considered before committing to release of Green Belt

- Proposed Green Belt release is not evenly distributed across the borough
- it does not recognise existing traffic problems and address them

Furthermore the PSV is not deliverable because:

- The target for house building are not credible compared to recent history since the financial crash in 2008, and the current economic climate is very different to that prevailing in the 10 years prior to 2008.

- The LTP4 is too vague and lacks the necessary detail in terms of timing and priorities in order to support the PSV.

- The LTP4 lacks costings of options, and sources of funds and therefore cannot be depended upon to deliver the transport solutions which are consistent with 19,000 new houses.

Yours faithfully

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