



16 June 2019

Planning Policy Team
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH
(by email)

Dear Sirs,

Consultation on Proposed Submission Version Local Plan for Warrington

Please find following my response to the Proposed Submission Version of the Warrington Local Plan. I am providing my comments in the form of a letter, rather than be constrained by the standard response form.

I had previously commented on the Preferred Development Options in September 2017. I note in the introduction (¶1.2.5) that you had 4500 responses to the PDO, and that all have been taken into account in the preparation of the PSVLP. As a result I have reviewed the plan specifically to see how my concerns have been addressed, but have also looked for other changes.

My primary concerns with the PDO were over the unnecessary release of Green Belt land, particularly in the South East area in which I live. I feel that none of these criticisms have been given due weight. In particular we will lose almost all the Green Belt land in this part of the Borough. This is both a valuable environmental and aesthetic feature, and this loss goes entirely against the current national and local concerns following recent UN reports on habitat loss and species loss. Warrington can grow and become more successful, but this should be by developing and improving the centre of the town and using brownfield sites, not by further despoiling the countryside in which Warrington is set.

I note the local plan (¶2.1.50) identifies major sources of pollution at a local level. This includes in our area significant issues from Thelwall Viaduct and from the M6/M56 interchange at Junction 20 on the M6. These become much worse whenever there is a problem on the motorway (high winds, traffic accident, even just holiday traffic). I use this road most days, and at peak times even without additional problems the interchange can be blocked, with traffic queues back onto the motorway. With the additional housing and warehousing planned in the PSVLP this will be an everyday experience.

I recognise that the Council lost a court case in the High Court over its housing targets in the Local Plan Core Strategy, but houses built just off a motorway junction with poor connectivity to town will not meet local needs. The number of houses being planned is much greater than Warrington has sustained even in the New Town Development era. In

my previous submission I challenged whether these assumed housing needs were based on unrealistic growth. Growth in the North West has been a little sluggish, particularly since the 2008 recession and the 2016 referendum on leaving the EU. The PSVLP recognises this (¶2.1.36), with a completion rate quoted for 2017/18 that would not justify the major release of land. Many of us fear that the rate of development would mean that the money available for infrastructure improvements will be much later than assumed.

Context and uncertainty

The “spatial portrait” (section 2.1) does not recognise the particular issues associated in the middle tier of government in the form of directly elected mayors with enhanced powers for the major city regions of Manchester and Liverpool. Warrington is sandwiched between two new cities and we may suffer time from being outside the sphere of influence of the two city regions.

There is a brief mention of HS2 – and a suggestion that this will “improve its links nationally” (¶2.2.3 and ¶6.1.11 especially). I fear this is a misrepresentation of the position. HS2 is likely to be a net negative to Warrington with the agreed Phase 2b decision. Fast trains to London will no longer stop here, but will bypass Warrington and go to Wigan. I think an overly positive view has been promulgated. In fact to catch a fast train, it is more likely people will drive to an HS2 station (maybe Wigan or Manchester Airport), rather than travelling to Warrington to catch a train to Wigan or Crewe and then change.

Mismatch between the Vision and the Plan

Section 3 of the PSVLP includes a positive vision of Warrington’s future development (grey box after ¶3.1.2). I welcome this vision and endorse it. My only caveat is that I think we will have to work hard to compensate for the loss of connectivity caused by HS2 not serving Warrington.

Unfortunately I don’t think that the PSVLP will actually lead to the delivery of the vision. Examples are:

- The emphasis on jobs in the logistics and warehousing sectors implied in the release of Green Belt will not help develop a “*strong economy that benefits everyone?*” (bullet 1) as the jobs are likely to be largely low-paid and may not be taken by local work seekers, not the higher paying jobs in “*engineering, hi-tech manufacturing, business services, ... and research and development?*” (bullet 3).
- “*Warrington’s growth will be positively planned to ensure that new homes, jobs and businesses are supported by major improvements to the Borough’s infrastructure...*” (bullet 2). I support this as a vision, but remain sceptical that the infrastructure improvements will be delivered, or will work. A major change since the PDO is that the indicative road over the old railway bridge from Thelwall to Latchford has been deleted. This was a “road to nowhere” as it couldn’t easily connect to a road that could take traffic from the proposed Green Belt developments. In the new PSVLP there are no realistic proposals that can relieve the likely problems with the M6/M56 interchange, nor which will allow the new Garden Suburb residents to connect into

Warrington. I remain concerned that the Garden Suburb will not actually integrate into Warrington but will be a commuter dormitory suburb for the neighbouring cities (Liverpool, Manchester, Chester). In this respect I feel that it will not meet the vision of “*New housing development will support Warrington’s economic growth*” (bullet 5).

- Similarly, I can’t see the release of the Green Belt as being compatible with bullets 6 and 7 of the vision – “*the character of Warrington’s places*”, “*attractive countryside and distinct settlements*”, “*Warrington’s rich green space network*” “*improve leisure and active travel opportunities and increase the Borough’s biodiversity*” – all these seem empty words.

Despite the caveats above, I do however feel the Vision is to be welcomed, even if the remainder of the plan falls short of achieving it.

Objective W1 and Policy DEV 1 – Housing Delivery

I have already commented on my lack of confidence in the housing needs assessment. These concerns are brought into sharp focus in section 4.1. The number of net completions in 2017/2018 was 359. How from this real data is this scaled up to 945 new starts **every year** for 20 years? The text refers to a Housing needs assessment, the Governments Standard Housing Methodology (from 2014), and PPG Needs assessment. At each stage additional margins seem to have been introduced. For example the 945 figure includes a 4% margin, and the scaling up in Table 1 includes a further 10% “flexibility” figures. Table 1 also has a figure of “Urban Capacity” of 13726, which I understand does not include some brown field sites (such as Fiddler’s Ferry power station) which will become available in the plan period.

It is my view that this part of the PSVLP is not fit for purpose, and does not make a compelling case for relinquishing Green Belt land.

Policy DEV 1 includes as paragraph 6 “*Should monitoring indicate that a 5- year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan*”. I partially welcome the implied admission that the planned new start numbers have considerable uncertainty. As a result, I feel that the local plan should have release of Green Belt as a last option – not as an early plan option. The priority should be for new development within the existing development boundaries of Warrington, and immediately adjacent to the town; the next should be on land remediation of brown field sites, in which areas new developments can be built to improve our environment not despoil it. Instead the current PSVLP will create a climate where developers will prefer green field starts in land released from the current Green Belt protected area.

Objective W2 and Policy GB 1 – Green Belt

The way in which Objective W2 and Policy GB 1 are worded is superficially reassuring; “*the Council will maintain the general extent of the Borough’s Green Belt...*”, and “*plan positively to enhance the beneficial use of the Green Belt*”. The reality is far more severe for people in South Warrington. In my area the entirety of the area from the A49 to the A50 will be given up.

If the proposals become embedded in the local plan, the intention will be to levy developers and start to build infrastructure. Unfortunately this does not mean that the developers will actually build the houses. Developers all around Britain sit on land banks which they could build on, but don't. They build when there is an adequate return on their investment, and when this represents the best use of their resources. The previous Local Plan was more explicit in conceding that eventually the Borough views the natural boundaries of Warrington's development to be the M56, M6, and M62 – with the only green belt within this area being places like Woolston Eyes, which is probably too difficult to develop, and the remainder of the Mersey flood plain.

I completely reject the arguments in the “Removal of Land from the Green Belt” (¶5.1.4-17). I do not believe that the PSVLP has “*fully evidenced and justified*” that there are “*Exceptional Circumstances*” to alter Green Belt boundaries, or that “*there are significant identified needs for market and affordable housing, as well as land for new employment provision, that cannot be met in full within the existing urban areas of the Borough*”. The PSVLP is in my view not fit for purpose in this respect.

I have already mentioned that additional brown field sites will become available in the near future, so I do not believe that “*...the Council has demonstrated that it has considered all other reasonable options for meeting its identified need for development through ... making as much use as possible of suitable brownfield sites...*” (¶5.18)

Objective W3 and Policy TC 1 – Town Centre and surrounding Area

In my letter on the 2017 Local Plan, several of my comments were about the priority for the town in getting the town centre working properly. I welcome all the work to complete the Time Square developments, and to revitalise Bridge Street. I am concerned that in the two years since, we have had major losses in the town centre, including the loss of M&S, and it looks increasingly likely that Debenhams will follow shortly. In order for Warrington to remain an attractive place to live and work, this should be our major focus – not allowing unnecessary development out of town on valuable Green Belt. Our focus on housing should be high quality flats close to the town centre, not a major “garden city suburb” disconnected from the town. Our major focus for developing jobs should be for high-value high-wage jobs close to the centre, not for low-wage distribution centres that despoil our landscape and sit on the horizon for much of the town.

Within this in mind, I generally welcome Objective W3. I have looked at section 6 of the PSVLP and again, I generally support policy TC1 related to this. There are imaginative ideas for town centre developments, including the riverside developments. With regard to the retail development in the town section (¶6.1.21-22) I have long thought that the expansion of out of centre retail needs to be carefully considered. Of course, the reality is that the last few years has seen a significant expansion of the “Albion retail park” (now “JunctionNINE”), so the challenges continue.

Objective W4 and Policy INF 1 – Sustainable Travel and transport Objective W4 and Policy INF 2 – Transport Safeguarding

I reviewed these two sections of the plan and although there were many fine sentiments and noble ambitions, I felt these sections were lacking in real substance.

The Borough Council has also commissioned a Local Transport Plan, which is again ambitious and probably therefore will not be delivered. Warrington already suffers significant issues with transport problems and frequent “grid locks”. I can see nothing in the Plan to give me confidence that these will become any better in the near future, nor that the infrastructure can take the significant levels of housing development and commercial transport envisaged.

I welcome all the initiatives and the move to less-polluting forms of transport (such as electrification of vehicles and encouraging cycle use) and to encourage investment in the public and community transport.

Overall however, I judge that the PSVLP is not fit for purpose in this area also.

Objective W4 and Policy INF 3 – Utilities and Telecommunications

The Policy recognises many issues with piecemeal development, in ensuring consistency through a build period, and this will put duties on the applicants for development. This seems to be partly driven by Governmental requirements (e.g. NPPF(2015)). I am sceptical however, as to whether in a climate of “red-tape reduction” there will be effective monitoring and enforcement of these requirements

Objective W4 and Policy INF 4 – Community Facilities

This is another part of the plan that is full of ambition, but short on substance. “*For the purposes of the Local Plan, social and community uses are defined as public, private or community facilities including: community/meeting halls and rooms; health facilities; libraries; places of worship; bespoke premises for the voluntary sector; schools and other educational establishments; theatres and performance spaces, arts venues, museums, sport and leisure facilities; parks and other publicly accessible open spaces, public houses, allotments, cemeteries and youth facilities*”. It is a harsh judgement, but over the last 11 years, with cuts to Local Government budgets we have seen closure of many of the facilities listed above. No concrete plans are provided.

Even in the area of the Warrington Hospital, the policy recognises that “*the current hospital is outdated and is not able to meet the future needs of Warrington’s growing and aging population*”. It is waiting for a review to be completed, and options have not been identified. As a result the PSVLP refers to this to “*be confirmed through a future review of the Local Plan*”.

Objective W4 and Policy INF 5 – Delivering Infrastructure

As in the previous version of the Local Plan, the model is that “*the Council will seek planning obligations where development creates a requirement for additional or improved services and infrastructure and/or to address the off-site impact of development so as to satisfy other policy requirements*”. I remain deeply sceptical about whether this will work in the context of the Garden Suburb.

The matters to be funded are so important, not just to the new home owners, but to all the communities abutting them, and to the whole town, but unfortunately developers are notorious for finding ways around levies and targets. There have been many examples of developments with a target say for 20% affordable housing where the early starts are on the more saleable houses and developers have come back with market-based reasons for

changing the targets. Additionally, in large areas, it is not uncommon for schools, health facilities, even access roads to either happen very late in the site development or to need further funding or grants from local or national government before they happen.

As with some other areas of the plan, this is so vague as not to be fit for purpose, in my view.

Objective W5 and Policy DC 1 – Warrington’s places

Much of this section of the plan is non-controversial. I only pick out paragraph 20 of the policy: *“The Council will encourage the preparation of Neighbourhood Plans to set Local Policies and provide greater detail in relation to development priorities specific to particular areas and local communities?”*. In the case of Grappenhall [REDACTED] this does not recognise the Village Design Statement from 15-20 years ago, which the community was encouraged to produce to show what they value and to aid the development of local policies.

Objective W5 and Policy DC 2 – Historic Environment

As well as looking at this section of the PSVLP, I also looked at the supporting impact assessment on heritage sites in the Local Plan part of the WBC website. I found that to be a trivial assessment, which showed no evidence that the author had actually visited the area or the sites.

I welcome that the Council recognises that it has not given this enough attention in the past; *“its Local List of non-designated heritage assets is out of date”*, *“not all of the Borough’s Conversation Areas have Character Appraisals and Management Plans”*, and *“not all of the Borough’s Conversation Areas have Character Appraisals and Management Plans”* (¶8.2.7-8).

I also agree with the final paragraph *“Once lost or altered, features of the historic environment cannot be replaced. It is therefore important that decision making is based on a full understanding of the significance of heritage assets affected by development, the impacts arising from those proposals and the wider public benefit arising from the proposed development?”* (¶8.2.14).

Although this section has good ambitions, I feel the effect of the large-scale development proposed in South Warrington means that I don’t feel that the PSVLP meets the tests of this section.

Objective W5 and Policy DC 3 – Green Infrastructure

Objective W5 and Policy DC 4 – Ecological Network

Objective W5 and Policy DC 5 – Open Space, Outdoor Sport and Recreation Provision

Although there is much that I welcome in these sections, I feel that they do not recognise the value of the countryside in South Warrington that will be affected by the changes to the Green Belt, or the ecological benefits from the hedgerows, and woods that will be lost. I am strongly of the view the best way of protecting these is by not taking these out of the Green Belt.

Objective W5 and Policy DC 5 – Quality of Place

This policy is more about how new developments are designed. It is not relevant to the main thrust of my objections to the PSVLP.

Objective W6 and Policy ENV 1 – Waste Management

Objective W6 and Policy ENV 2 – Flood Risk and Water Management

Objective W6 and Policy ENV 3 – Safeguarding of Minerals Resources

Objective W6 and Policy ENV 4 – Primary Extraction of Minerals

Objective W6 and Policy ENV 5 – Energy Minerals

Objective W6 and Policy ENV 6 – Restoration and Aftercare of Mineral and Waste Sites

These policies appear to be mainly “boilerplate” reflecting the need to cover these areas in the PSVLP. However I do not believe that commenting on these will be relevant to my response to the PSVLP consultation.

Objective W6 and Policy ENV 7 - Renewable and Low Carbon Energy Development

I found this policy, although well-meaning, to be a curious mix of the timid and the overambitious. Given the current concerns over environmental threats, I would expect that the Council would look for new dwellings to be “zero-energy” “green” houses, rather than the timid target of “*at least 10% of their energy needs from renewable and/or other low carbon energy source(s)*” (ENV 7, bullet 4). Conversely, the PSVLP quotes a study carried out from the Council that says “*the long-term ambition is to deliver a strategic district heating network across the Borough*” (¶9.7.15-16). Whereas this may be an option for town-centre developments, it does not make sense for the proposed Garden Suburb developments.

Objective W6 and Policy ENV 8 - Environmental and Amenity Protection

Part of this Policy is related to air quality. I have looked up the current information on air quality on the Borough Website, and note that there are currently two air quality monitoring areas. One is the motorway network, the other is the central trunk roads in Warrington. The PSVLP does not mention that the AQMA for the trunk roads include Chester Road (A506), London Road (A49), and Knutsford Road (A50) as far as the Ship Canal. The proposed Green Belt developments will join these congested routes to the existing congestion at the motorways and extend the areas of concern.

Overall across all policies related to Objective W6 I conclude that these policies are an attempt to put a green gloss on the Local Plan, whereas in fact the main impact will be detrimental environmentally. I conclude that this is further evidence that the PSVLP is not fit for purpose.

Site Allocations / Policy MD2 - Warrington Garden Suburb

This Policy shows how the Local Plan would be implemented in South Warrington, should it be adopted. Many of my criticisms of this policy will just be repeating comments from earlier on in this letter. I will just pick up a few new points.

Under paragraph 14 of the Policy, the PSVLP says:

“14. No further residential development will be permitted until:

“a. The funding and programme for delivery of the Green Infrastructure Network including Country Park have been confirmed.

“b. The funding and the programme for the delivery of a strategic link to connect the Garden Suburb to the local and strategic road network have been confirmed.

“c. The funding and the programme for the delivery of community infrastructure within the Neighbourhood Centre have been confirmed.

“d. Where development is within one of the Garden Villages, the funding and the programme of the delivery of the community infrastructure within the relevant Garden Village have been confirmed.”

I should be reassured by this because I do not believe that the enablers will be funded to allow the development, but I think that there may be a significant risk that infrastructure such as roads would be funded, that industrial development be allowed and then developers sit on their land backs until commercial conditions change. We may have decades of piecemeal development and “roads to nowhere”. I don’t think that the level of development will be sufficient to need the freeing up of Green Belt land and we’ll end up with having lost the amenity and environmental benefits of the land and not had any of the other infrastructure benefits from the planned villages and community facilities.

I will be separately objecting to the details of the employment area (paragraph 27-28 of the Policy). The existing development causes congestion already at the M6 J20/M56 J9 intersection. The existing development is much better situated than the proposed one, as the warehousing and industrial units are on the old airfield and further up Barleycastle Lane. The proposed development brings industrial development right onto the B3536, and this is a natural horizon for much of the surrounding land.

I have chosen not to comment on the equivalent policies for the Warrington Waterfront, the South West Urban Extension, the land at Peel Hall, Burtonwood, Croft, Culcheth, Hollins Green, Lymm, or Winwick. My general comments would still apply.

Conclusion

I have spent a lot of time looking at the PSVLP and trying to reach a balanced view, as I did at the previous version in 2017. I have tried to be balanced in my view and give support to those parts of the plan which will help Warrington develop in the next few decades so it remains an attractive town to live in, and one that attracts well paid and high-value employment opportunities.

I think if the Plan was allowed to truly be a Local Plan, reflecting the wishes and desires for the town going forward, it would have general support. Instead, the high level of concern from local people is a result of external pressures (developers, and the effect of the 2016 High Court case) which has led to the very high level of provision for development and the perceived need to free up much of the Green Belt in South Warrington. I do not feel this is justified and the Proposed Submission Version of the Warrington Local Plan is in my view not fit for purpose.

I hope you find my contribution to the debate helpful.

Yours sincerely,

[REDACTED]

DG WILLIAMS (Mr)

[REDACTED]