



Subject:

Local Plan consultation comments

Date:

15 May 2019 11:00:42

Attachments:

Warrington Borough Council Local Plan Consultation 2019.doc

I am attaching comments related to the local plan and the consultation process which I would be pleased if you would note and action.

Could you please acknowledge receipt of this note and the attachment

regards Stephen Kelham



Warrington Borough Council Local Plan Consultation 2019

General Comments

I have spent some time examining the written proposals for the 2017-37 Warrington Local Plan and the transport plan LTP4, and have visited your displays and talked to a number of your representatives at that event. While the FAQs provided appear comprehensive, they seem to be primarily a wish list, and an “all right on the night” approach provided the numerous problems which are still identified are resolved satisfactorily in time. I am therefore highlighting a number of significant concerns I still have and hope that you will take these into account when carrying out your further reviews. As an example, failure to bring HS2 through Warrington would leave the town sidelined and overall long term viability in question, which is glossed over in your proposals.

My understanding is that the Warrington Local Plan Core Strategy adopted plan of 2014 has only been partially revoked - the housing target of 500 homes per year between 2006 and 2027 was removed. Parts of policy W1 and CS2 have been quashed and some supporting text removed. This was because the claimant argued successfully that a full objective assessment had not been carried out to determine an affordable housing allocation that would meet the areas' need and that the plan did not comply with the Strategic Environmental Assessment Requirements. The result is that there is currently no housing policy currently in place, and the new plan's primary objective is to fulfil this legal requirement. A five year land supply for houses must be demonstrated, and while plans extending to 2037 may be desirable to look at long term problems, the key issue is to ensure that developments within the next 10 years can be sustained, and in that context, the greater part of the 2014 plan is still valid.

On a timescale to 2037 we are likely to see major decision making by central government. Issues such as Brexit, future transportation policies, phasing out of diesel and petrol engines, cessation of coal fired power generation and revised forecasts for population growth etc are likely to be made in the next 10 years. These will have the potential to disrupt the best laid plans and it seems unlikely that anything proposed for Warrington for the period 2027-37 will escape the need for major revision. The plans proposed are unlikely to be approved before the end of 2020, and in the case of the transport plan, much of the real thinking will be required in the immediate 5 year period, by which time there will be only about 12 years left for implementation. Representatives at the presentation showed plans for transportation links, cycle ways and infrastructure which would have to be in place before many of the Greenfield developments could start, so it is apparent that any Greenfield developments prior to about 2027 would run a serious risk of being disrupted by the more realistic development of the transportation strategy which is still to take place. It would seem much more reasonable that the 2014 adopted plan, which did not require the use of any Greenfield sites should be implemented to 2027 as originally proposed. Any developments post 2027 should be completely thought through between now and 2025 so as to form a cohesive plan for the following 10 years. Delaying starting implementation of any Greenfield proposals would avoid a lot of poor decision making and recycling of proposals, together with additional costs..

The 2014 plan appears to call for about 525 houses per year up to 2027 (a total of 10500 between 2006 and 2027 - policy CS2) and 381ha of employment land, all of which could be accommodated without intruding on the Green Belt, which was considered to be inviolable till beyond 2027. More recent proposals are based on edited and expanded versions of this plan have increased the number of housing to 18900, with the justification based on house building estimates made for 2017 of 792dpa. 2019 Hearn report (Para 2.6) These projections appear to be based on statistics for house build which are atypical, as housebuilding of 1 and 2 bed flats and apartments reached a peak around 2017, and has more than halved since then, with the currently achieved build rate of less than 400 per year. The basis for the build proposals need critical examination, as although it is reasonable to adopt national guidelines for growth predictions, the statistical foundations on which the predictions are made must be very sound, which in the case of the proposals, they are probably not.

Warrington Council has aspirations for growth, but is the growth of the town to be a result of the number of new dwellings erected or is it the result of demand for more employees from new or existing industry? Regional policies from Central Government come and go, but do the projections take into account the plans for expansion through the Northern Powerhouse, the aspirations of Manchester, Liverpool and adjacent boroughs such as St Helens and Halton? There is no "New Town" plan to benefit Warrington with a ready made infrastructure, so this side of the proposals must be largely developer funded. From looking at the schemes being proposed and the lack of substantiated costing data, many of the proposals appear to be unrealistic, unsustainable and unachievable, and are not likely to generate great enthusiasm for contractors to become involved, given the risks associated with implementation. More justification is required for the numbers proposed and the soundness of the proposals requires thorough examination in the context of the whole of the North West Region.

Monitoring of the plans is a key element which has been identified, but there is little in the 2017/2019 proposals which refer to progress to date, and lack of information reduces the credibility of the whole planning and implementation process. Can an average of 945 houses a year be delivered on the timescales proposed?. What is the track record of the 2014 plan to date? Where does the figure of 792 dwellings in 2017 quoted in Hearn report come from? As the planning process extends and eats into the 2037 deadline the build rate must have to increase to well above the average and the ability to build up to 1500 houses per year, together with all the infrastructure projects must be credible. Credibility, in that the new plan must not be seen as a major departure from previous proposals but is part of the same long term strategy must be maintained, and valid reasons need to be provided when there is a significant change of direction, which has not been provided.

The Hearn report Table 57 and elsewhere suggests an anticipated population increase of 28583 by 2037 and gives a useful breakdown of age groups, which appear to be the key to the decisions to be made on the numbers and types of housing developments required. However, it states that the table is based on a house build of 909dpa over the period and it is not clear whether the demographic model is really a projection of population growth or merely a justification of a target housing build.

It would seem that growth in the indigenous population is likely to account for at least half of the projected population growth, and that pressures for schools and accommodation for the elderly will be derived from various modelling techniques. The future elderly are already with us and additional primary and secondary schools should be located where the catchment is stable, not in mushroom areas where demand will peak and then fade away. The soundness of the plans will be shown by the convincing modelling of the needs for the young and elderly, including social service care, hospital provision and local transport arrangements.

The proposals suggest that the Fiddlers Ferry site is to be held in reserve as brownfield development land post 2037. This seems to be a deliberate policy to create more development within the Green Belt. The Government policy is that green belt land should only be used in exceptional situations, and having a very significant undeveloped brown field site within the Warrington area should be totally unacceptable to central Government assessors. Coal fired power generation is expected to cease completely at Fiddlers ferry in the very near future. Biomass combustion is not a viable option so it is unlikely that large scale power generation will continue, and the site owners will be seeking alternative uses. It is therefore unsound for this site to be excluded from the plans, and the reasons for not including it must be fully justified. Pressure from the Council on the owners to make the site available should encourage them, and the demolition of the power station buildings would make the Warrington and surrounding area much more attractive for all.

It seems very likely that a very significant part of the new employment areas will be taken up with warehousing operations. In the modern world, these are not large users of labour but generate very significant traffic movements and need excellent access to the motorway and rail networks. The location of most of the proposed warehousing on the Fiddlers Ferry site would give easy already established road and rail links throughout the NW, and significantly reduce the need to take employment land from the green belt, for the purpose of building sheds and employing a few dozen people.. Any reasons for not pursuing this approach need sound justification.

The plan depends heavily on the development of “Port Warrington” and the increased use of the ship canal. Peel Holdings are the key player, not Warrington BC. If the ship canal is not integral to the proposals, Port Warrington will just be another transfer and storage facility, which could be located anywhere, including the Fiddlers Ferry site. I have seen estimates of the numbers of vehicle movements projected for Port Warrington, and if even near the projections, will lead to major traffic noise and pollution issues on whatever roads they may be using. Traffic movement and pollution assessments needs to be incorporated into the plans and justified before they are ratified.

No mention is made of the impact of increased shipping traffic on the traffic flows within South Warrington and the disruption caused by closure of swing bridges. I understand that Peel holdings are planning substantial increases to canal based freight traffic, although the current plan does not seem to acknowledge this. The viability of the ship canal cannot be sustained by current traffic and unless it is to be shut down, there must be plans to increase its use in the future. The absence of firm plans in this area are a fundamental flaw, and if there is a likelihood of significant traffic

disruption within Warrington, the plans must provide for a variety of high level crossing points within the Borough.

I note that the plans do provide provision of reserved space for a new/duplicate/replacement for the Cantilever Bridge, but do not provide for any additional road infrastructure. The Garden Suburb has no access routes to the town centre apart from the existing overcrowded roads, and any North-South traffic will continue to have to use unsuitable roads, in conjunction with cycleways and other services. While the plan pays lip service to long term developments, these are required urgently, and their absence must be justified in the Plan, with the reasons for not making suitable new provisions made clear.

The development plan document does say, quite rightly, that the major developments of Port Warrington and the SW Suburb are dependent on the Western Link proposal going ahead. This seems to be moving forward, in that it is on "the list" for partial funding by central government, as part of a regional strategy. The Western Link is only a single carriageway road and for the traffic projections from Port Warrington and elsewhere, not making it a dual carriageway seems to be aimed at creating a long term bottlenecks. Your representatives indicated that it could be converted to a dual carriageway before the project is started, but this is likely to add about 50% to the already spiralling costs. It is assumed will be in competition for funding with many other equally deserving projects, and a cost escalation of this magnitude before sanction could easily lead to it being rejected. Should the Western Link not receive funding on the time scales required for the implementation of the plan, there appears to be no "plan B" and the assumption must be that all the proposals will be put on hold until the go ahead is given. Given a 3-5 year programme for building the Western Link, what is the timescale for the funding and how does this impact on the overall proposals?. It is still not clear to me how E-W traffic will join the new road where it leaves the A56 and how free flows can be maintained. The deliverability of the whole transport plan for South/West Warrington seems highly unsound and needs reconsideration.

Similarly, the Strategic link from the A50 to the A49 through the Garden Suburb is highlighted as being essential at the start of the this phase of development. The plans that I have seen comprise a multi carriage way link approx NE to SW and other links to put traffic on to the A49 and A50 but no way of accessing the town centre without using the currently traffic limiting swing bridges or the Cantilever. Proposing partial dual carriageway while the Western Link is only single suggests that the traffic volumes on the Strategic Link will be even higher, with noise and pollution levels totally unacceptable for an essentially residential area. It is implied that there will be dual carriage sections adjacent to key junctions – indicating that there will be bottlenecks at these points, and no suggestions are made for improving roads such as the A50 and A49 where the junctions occur. A49 traffic through Stockton Heath is bottlenecked at most times even now, and the South Warrington expansion proposals will make this far worse. There is no sensible route planned for east west traffic accessing the Western Link other than by using unsuitable suburban routes through Appleton and Stockton Heath and use of traffic limited listed bridges over the Bridgewater Canal. The Strategic Link junction with the A49 adjacent to the M56 junction 10 will further slow north south movement, and on the occasions that the Thelwall viaduct is closed Warrington will come to a standstill. Over all, while the

Garden Suburb and other proposals may have good internal access there is no joined up thinking related to the rest of Warrington. The plans are seriously flawed, unsound environmentally and technically, are unlikely to be delivered on the timescales required and cannot be justified because of their impacts on other areas of the town are not adequately considered..

The transport plans specifically encourages cycling and walking and the aspirations for a “dutch approach” are commendable. However, there appears to be little joined up thinking as many of the designated cycle and pedestrian ways are in conflict with increased uses of local highways eg the A49 through Stockton Heath. Further slowing down traffic on safety grounds is not an option, as stationary traffic is still incompatible with cycling and walking. These roads are just not big enough for separate cycle ways through these congested areas, eg Stockton Heath, and across the swing bridges. It was indicated that these plans are indicative only, but must still be implemented before major housing developments take place, and the practical implications must be resolved as a high priority.

The plan emphasises the primacy of the Town Centre as the focus for shopping and social activities in the next 20 years. Out of town shopping developments are now out of favour and while it is reasonable to try to attract a Cafe Culture to the Centre with large numbers of dwellings and shops within easy walking distance, this is unlikely to be of any benefit or use to those who would have to make a special journey. People don't go to town centres to do food shopping etc or where bulky items have to be carried and unless there is ample free parking, town centre shops will fail. The Baron's Quay development in Northwich is a good example of over ambitious expansion and empty stores, and it is easy to see the new and proposed developments in Warrington going the same way unless there is a major cultural and social shift in population preferences. These cannot be forced on people and must be a result of convenience and desirability. The plan does little to give confidence in this area and examples of successful implementations of such plans need to be used to justify the proposals.

The move to enhanced rapid transportation links, use of bicycles (and mobility scooters for the elderly?) is commendable, and there is no doubt that by 2037 these will be more widespread. Central car free zones will mean little or no use by those who cannot access public transport within a few tens of meters from their front doors. Whatever public transport is proposed must be convenient to all, frequent in service and free or at very low cost – and pricing out vehicles through limited parking and high charges will push shoppers out of town altogether. Examples of similar implementations and the cost benefits need to be given for justification of plans, and not including the Halton Busway operations as an example of good practice seem to suggest that this approach has largely been a failure.

A need to replace the Warrington NHS hospital has been highlighted in this and previous plans but does not appear to be within the proposed 20 year timescale. If Warrington is to become a location of choice, a major investment in a new hospital on a preferably brownfield site is essential, which would also release the existing inefficiently laid out site for near town centre development. The strategic issue of a site for this needs to be identified within the time frame for the new plan as its location will have a significant impact on transportation links in the town.

The need for Social and Affordable housing as a major part of the developments is highlighted, with up to 30% of new developments in this category. Much of the new housing is planned to cater for the increasing elderly population, with decreasing mobility and increasing needs for care provision. Most of the elderly who remain in Warrington do not wish to move out of family homes until forced to through medical or other needs, and even then want to remain near to friends and neighbours. New build accommodation for the elderly in new suburbs is unlikely to be popular, and proposals in these areas need careful examination of social issues which is not highlighted as part of the plan.

Very little is said about the funding for the proposals in the Plan. It seems that Central Government funding for infrastructure projects will be limited and most of the infrastructure will have to be provided from the developers themselves. Section 106 agreements for the provision of infrastructure in association with development rights will be very important and Community Infrastructure Levies (CIL) may be made to ensure funds are available for the proposals as a whole. The project viability studies by potential developers will trade these off against the value of the developments and the proportions of affordable housing in the schemes. In a scheme with high infrastructure costs, developers will request reductions in proportions of affordable housing or declare the schemes are non viable, and refuse to bid. Greenfield sites will be more attractive to developers than Brownfield. The opportunity of the Council to use Greenfield land, which is currently owned by them directly or indirectly as a result of historic New Town acquisitions, cannot be used as an excuse to generate infrastructure revenue through its development when other options are available. The Plan is unsound in its financial commitments and it needs to be very clear what the costs are likely to be and where the money is coming from. The financial implications for the revenues and expenditure for Warrington over the 20 year period and beyond, need too be explained and how the delivery will take place. If the Council is to attempt to become a major project manager of multi billion pound projects, the implications of this need to be made very clear and fully justified. The current record of delivery on major projects need to be used as examples of capability, and my view is that these will be found wanting..

Overall, although the Plan and the ancillary documents are very impressive in their bulk and presentation style, the content is largely aspirational and leaves many questions to be resolved. The practical considerations of much of the content is not resolved adequately, and the soundness of the thinking must be called into question. Justification of many of the proposals is superficial or non existent and any attempt to deliver of a plan of these proportions within a the timescale proposed will be on a par with Crossrail or HS2 – twice the cost and twice as long as a starter.

If Warrington can deliver on the proposals of the 2014 plan in the next 10 years it would be highly commendable, with maximum use of brownfield sites and no significant incursions into Greenbelt areas. By 2027, the nationwide decisions on Brexit, infrastructure, population growth projections, transportation, the NW powerhouse and energy policy will have been made and the generation of a new realistic 10 year plan to 2037, which can be financed, delivered and be socially and environmentally acceptable could then be developed.