

Warrington Conservatives

Caring & Campaigning for our Community

Conservative House
1 Stafford Road
Warrington
WA4 6RP

Stephen Broomhead,
Chief Executive
Warrington Borough Council

Letter sent via email to: [REDACTED]

17 June 2019

Dear Stephen

Warrington Proposed Submission Version Local Plan 2017 to 2037

I wish to raise the following points as part of the consultation into the above document.

Town Centre Regeneration

I welcome elements of the plan, in particular the intention to regenerate areas of the town centre however you will be familiar with the vast differences between inner and outer areas of the Borough and there must be a renewed focus on improving the housing, services, leisure and retail mix to deliver a centre which is renewed and able to offer the cater for future generations.

Unique Character of the Area

I recognise that some development will be needed to accommodate future population growth within the Borough however, I do not believe that scale and nature of what is being put forwarded is necessary or supported by residents from across the wider Borough. Despite assurances that the plan will preserve the character and distinctiveness of unique settlements, these proposals will in effect have the opposite impact, dramatically changing the nature of the villages which form a more rural setting in the Borough, south of the ship canal.

Community Support

Of particular concern is that, despite significant opposition from residents to the Preferred Development Option consultation, little appears to have changed in the PSV. The overwhelming rejection by local residents of the proposed 'garden suburb and logistics site' appears to have been ignored. The plan does not appear to carry the support of residents living locally. As a resident, elected representative and Prospective Parliamentary Candidate I have attended numerous public meetings where I have spoken to people who live in the villages which will be impacted by these proposals. I understand that some decisions will not carry favour with everyone however these plans do not appear to be supported by anyone other than developers and Council Officers.

Infrastructure

I note the plan indicates that the Council intends to prioritise 'brownfield' land and bring forward development of affordable housing to support jobs growth in Warrington but this is set against significant release of green belt in an area which is highly sought after and has higher housing prices than much of the North West of England because it is popular as commuter area for people working in Manchester and Liverpool rather than Warrington. Additionally, there is insufficient investment proposed into the wider motorway and trunk roads network to accommodate a logistics and distribution park of the scale proposed.

I understand from feedback received from neighbouring authorities that this view is shared more widely. Congestion is a major problem in Warrington with the town intersected by the Bridgewater Canal, Manchester Ship Canal and River Mersey. The likely increase to the frequency of opening of the swing bridges will add to the problems and whilst I welcome initiatives to support cycling and walking the reality of our location mid-way between Manchester and Liverpool is that cars will continue to be the preferred method of transport through this plan period.

Having supported the Council's bid for government investment into the Warrington Western Link, I am very aware of the need to ensure sufficient further infrastructure is in place to support the level of development proposed within the plan and I am concerned that the plan does not contain sufficient action and safeguards to ensure that this will happen. Having raised questions with officers, there is no clear plan to improve local roads to cope with the anticipated increase in vehicle movement.

Economic Growth

It is not unfair to say that there is perhaps a greater degree of general economic uncertainty at present because of BREXIT. This uncertainty adds to the level of difficulty around forecasting ahead. The minimum period for a Local Plan period is fifteen years and I would urge the Council to revise the plan period which would reduce the number of houses required and in particular the level of green belt development needed.

Since 2010 Warrington has seen a significant increase in the levels of employment, supported by strong economic growth within the wider region. The predicted growth for the Borough during the plan period remains ambitious however there is little justification for such level of optimism. I would suggest that there needs to be careful scrutiny of the basis of such predictions particularly as the level of economic activity proposed has not been experienced before.

Housing Numbers

As you will be aware, in March 2019 I wrote to the Secretary of State for Housing, Communities and Local Government for his guidance following comments made publicly by the Leader of the Council relating to proposed housing numbers. In his response he clarifies that 'local authorities should make a realistic assessment of the number of homes their communities need using the standard method as the starting point in the process'. In his letter, James Brokenshire MP clarifies that these numbers are not targets and 'once established, planning to meet the need will require consideration of land availability, relevant constraints, and whether this is more appropriately met in neighbouring areas'. I can see little evidence within the plan that there has been sufficient reflection on the 'relevant constraints' and only limited dialogue with neighbouring authorities with regards to the option for collaboration in achieving housing development numbers.

When looking at recent build rates for 2018/19 of 359 per year, the peak year for development within the plan of 1656 seems to be impractical and is highly likely not to be delivered because of 'relevant constraints' such as available labour force to build new homes, which will not change sufficiently during the period of the plan.

Brownfield V Green Belt

There is an overwhelming need to build on brownfield land first however the Council have themselves published detailed documents which appear to highlight their intent to build on green belt as a priority early in the plan period, without seriously attempting to clarify the availability of large areas of brownfield land which are likely to become available for re-development, such as Fiddlers Ferry.

At the start of June, I wrote to the CEO of SSE, the company which owns the Fiddlers Ferry Site to ask for them to clarify their plans for the future of the Coal Fired plant. Without themselves speaking to SSE the Council responded in the press, repeating their comments within the proposed submission saying 'there is not sufficient certainty for the site to be included within the council's developable employment land supply, but given the scale of the site it would be kept under review.' Just a few days later, SSE announced that the plant will close in March 2020.

This news significantly changes the level of brownfield land available within the plan period and gives the certainty that the Council suggested wasn't available. There is a presumption within NPPF that brownfield should be prioritised, indeed the letter from James Brokenshire MP asserts that the 'Green Belt should only be altered where exceptional circumstances are 'fully evidenced and justified' and where all other reasonable options for meeting identified development needs have been examined'. Given that the land at Fiddlers Ferry has not been

included within the Council's considerations and therefore not included as a potential for meeting the identified development needs the Council must now revise this plan prior to submission and re-consult. The scale of opportunity presented is significant and the Council has a duty to ensure this area is supported and regenerated to encourage future economic development in an area which has existing rail infrastructure.

Air Quality & Environment

In May 2016, Warrington was named by the WHO as one of the worst places in Britain for breaching air safety limits. Air quality is a material consideration in planning terms. The plan does nothing to address this issue, Stockton Heath in particular has serious problems because of the location of crossing points over the Ship Canal. I do not see any suggestions in the plan which will help to improve air quality, indeed the plans will likely add to the problems by increasing the number of cars using the route into the town centre as no new crossing points are detailed within the plan other than the Western link.

Deliverability

I welcome an aspirational approach to planning but these proposals do not appear to be deliverable. Too much infrastructure is reliant on developer contributions with no guarantee that this will be provided at the right time or allocated in the right places. As has happened elsewhere, developers will often seek to mitigate their obligations by arguing against agreements because of falling returns when compared to initial projections and the real prospect of a 'garden suburb' without the necessary infrastructure would be totally unacceptable. Whilst I note there is an intention to provide new schools and health services there is little information supplied that there has been consideration to the supply of sufficient doctors, teacher and other necessary key skills to meet the needs of the projected population.

Conclusion

Because of the concerns I have raised above, in particular in relation to predicted population growth and the level of housing proposed, which does not appear to be realistic and achievable this plan must be amended. During the consultation, material changes have been identified to the supply of brownfield land because of the decision to close Fiddlers Ferry Power Station. Recent changes to the NNPF strengthened requirement to protect the green belt and I cannot see evidence that very special circumstances have been identified to justify the changes proposed. Overall this plan is not sound and as such should be revised prior to submission to the Independent Inspector.

I also endorse the submission by South Warrington Parishes Working Group and Rethinking South Warrington's Future, which have detailed observations on the Local Transport Plan.

Yours sincerely

Andy Carter

**Andy Carter
Parliamentary Candidate
Warrington South**