



Councillor Ryan Bate

Prospective Parliamentary Candidate for Warrington South

Thursday 13th June 2019

Dear Sir/Madam,

Local Plan/LTP 4 Consultation Response

I write as the Borough Councillor for Grappenhall & Appleton Thorn, a Grappenhall & Thelwall Parish councillor and as a resident of Grappenhall. In addition, I am the Chair of Rethinking South Warrington's Future (RSWF), the members of which I am sure would support the contents of this response.

Through my role as Chair of RSWF and my membership of the South Warrington Parish Councils' Local Plan Working Group, I am aware of the range of detailed responses which have been made for these consultations. In particular, I would endorse the submissions from the South Warrington Parish Councils' Local Plan Working Group, that of Grappenhall & Thelwall Parish Council and also the transport and air quality papers submitted by RSWF. In knowledge of these responses, I do not intend to try and match their breadth and depth or repeat the range of incisive policy issues raised within them. Instead I wanted to offer what are, in my opinion, the key concerns and contradictions of the Local Plan and LTP4.

A 20-year plan invites more problems than it solves

NPPF guidance stipulates an authority must plan for a minimum of fifteen years. Any extension beyond this is arbitrary. I also note that Warrington's last Local Plan was for a fifteen-year period. In my opinion the decision to plan for a longer twenty-year period invites more problems than it solves, namely:

- The additional five years of housing and employment land can only be met through the release of Green Belt. So, by arbitrarily choosing to plan for a longer period, we are also choosing to release land from Green Belt.
- The longer into the future we seek to forecast, the less accurate those forecasts can be. So, the anticipated development, which is driving Green Belt release, could subsequently be found to be overestimated.
- Whilst forecasts are inaccurate, much of the recent population data already raises issues with the projections used in the plan which are based on older data. This supports my previous point regarding uncertainty.

Given such uncertainty around long-term forecasts I do not believe we should be opting for a longer-term plan period and therefore releasing Green Belt which may not actually need to be

released. By instead choosing the fifteen-year plan period, we can reduce Green Belt release. NPPF also stipulates a five-yearly review of the plan and whilst I accept the principle that Green Belt reviews should be long-standing, I also believe that we must protect Green Belt at all costs and if the price of that is a further Green Belt review five or ten years down the line should forecasts suggest one is needed, I think that is a far better option than releasing a swathe of Green Belt now on what is essentially a 'just in case' basis.

Contradicting priorities

A welcome element of the Local Plan is its focus on Town Centre regeneration and the repopulation of inner Warrington which is required to guarantee the regeneration's success. The fact that much of the housing is allocated for brownfield sites is broadly sustainable. This spatial option also reduces the need for the expensive infrastructure improvements involved in developing south of the borough's major waterways. The plan also tries to give some guarantees and safeguards to ensure that these brownfield sites are developed first. Unfortunately, I have concerns that those guarantees alone will not do enough to ensure the Town Centre regeneration and repopulation are successful.

From five years into the plan period, the larger sites released from Green Belt in south Warrington become available for development (some development will already have happened on greenfield sites within the first five years; not necessarily with any infrastructure improvements). That is assuming that developers are forced to keep to the infrastructure delivery plans outlined. As soon as greenfield sites become available, my fear is that developers, when presented with a choice between brownfield and greenfield, will opt to develop the more profitable greenfield sites in the outer borough. Nothing I have read gives me any confidence that local authorities have any powers to force developers to do otherwise; if the strategic infrastructure in south Warrington is complete, then those sites can be developed whilst brownfield sites remain undeveloped.

Furthermore, the Garden Suburb and Southwest Extension both have a distinct lack of connectivity with central Warrington. Current trends suggest that the existing population of south Warrington may work and spend their leisure time elsewhere, however the future success of Warrington's regeneration cannot solely rely on the repopulation of the Town Centre. We must ensure that an increasing proportion of residents from across the borough see the Town Centre as their first-choice destination for employment and leisure. This will not be achieved without better connectivity, which is one of the major reasons for the current trends of people working and shopping in Liverpool, Manchester or elsewhere. By predicating the entire population growth of south Warrington on increased public transport, walking and cycling, both the Local Plan and LTP4 are not only proving themselves unsound, but also undermining the stated aim of regeneration. With no new road capacity to take residents from south Warrington into the Town Centre, people will have little choice than to continue to spend their time and money outside the borough.

A sounder approach would surely be to limit the amount of land released from Green Belt thereby ensuring that developers have to take the brownfield sites which the Town Centre regeneration relies upon. Furthermore, by reducing development in the outer borough, especially south of the major waterways, the Local Plan and LTP 4 avoids adding to congestion or creating the need for additional crossings of the Manchester Ship Canal and River Mersey which would be inevitable if the proposed Garden Suburb and Southwest Extension were to go ahead.

Delivery

As a result of Warrington's unique geography and the history of development across the borough, both the Local Plan and LTP4 face major challenges in terms of delivery. Infrastructure has never kept pace with population growth. The borough's river and canals create special challenges for roads and bridges. The three motorways orbiting the borough add to congestion. Warrington Hospital has rightly been recognised as no longer meeting the needs of the town's current population; yet delays in delivering a new hospital mean this issue becomes more serious each year. The national policy pictures for healthcare and education make it difficult for new services to be delivered, even though provision may be made by planners (a lesson learnt in Chapelford).

Such is the complexity of the challenges facing Warrington, both the Local Plan and LTP4 have significant hurdles to clear. Whilst both plans are ambitious in this regard, the sheer scale of development – much of which has been opted for over and above requirements – means that the delivery of each plans will be incredibly difficult to achieve. Should, for example, the Western Link or the Southern Strategic Link not be delivered to time or to budget, this will completely undermine the delivery of the housing and economic activity at the centre of the plan. The subsequent impact on the Council's ability to pass the Housing Delivery Test could have future ramifications for planning powers. Why would the Council needlessly risk the viability of the plan by adding unnecessary complexities and hurdles?

A plan that works for Warrington

Taken together, the three concerns outlined above all point to the same conclusion: the plan is making itself unsound through poor choices which do not need to be made. By opting for a shorter planning period, not only can we protect Green Belt, but through protecting Green Belt we can further guarantee the development of the brownfield sites in turn supporting the repopulation and regeneration of the Town Centre. All this can be done whilst still using the Council's dubious figure of 945 houses per year. This figure is in part dubious as a result of the household projection data insisted upon by government. The Council then adopts an uplift based on uncertain economic forecasts; the uncertainty of these forecasts is only added to by the distance into the future which the forecasts try to predict (as outlined above). A letter from the Secretary of State for Housing, Communities and Local Government has insisted that the government methodology offers a starting point rather than setting a target. This all suggests that the Council is opting to overstretch development, thus inviting risk to the delivery and wilfully releasing Green Belt unnecessarily.

Warrington's economic growth forecasts, which drive both housing targets and the need for employment land, are also highly questionable. Unlike Crewe with HS2 or Chester with the Science Corridor, Warrington does not have a distinctive driver of economic growth. Much of the housing seems to be driven by its desirability as a commuter town. If one would argue that logistics is a driver of growth, I would suggest that the environmental impact of logistics, uncertainty over the long-term impact of automation on employment and questionable local economic benefits do not make it a desirable driver of growth. The differences between the various forecasts sought as part of the plan-making process only highlight the uncertainty around long-term economic growth. We still do not know the long-term impact of Brexit, some economists are warning of the next global recession and the changing patterns around retail, working practices and automation mean that we should not be engaging in the futile process of gazing into crystal balls, especially if the cherry-picked

gazings lead us to decisions which cannot be delivered and actually lead to priorities which undermine each other.

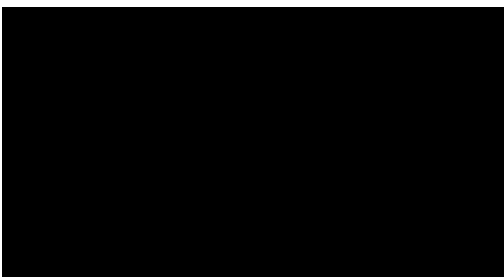
Further evidence of the uncertainty surrounding the twenty-year plan also arose with today's announcement on the closure of Fiddlers Ferry. Not only does this highlight the uncertain nature of job forecasts and economic trends, it also tells us that, like with the question marks around the new hospital, we don't have a firm handle either on potential brownfield sites which may become available in the plan period nor do we have a handle on future demands on greenfield sites, such as a new hospital, which are not accounted for in the plan. The plan also makes little reference to how HS2 or HS3 routes may impact future development of the borough. Again, trying to forecast so far in the future is unnecessary when such major changes to the area are still unknown.

Given Warrington's unique geographical and infrastructure challenges, the Council should be arguing follow a lower number which is deliverable and achieves what I believe should be the two key objectives of regenerating the Town Centre and protecting Green Belt. Having a shorter plan period helps us to achieve these key objectives, not least because it avoids too much futile forecasting. Arguing for a lower annual housing target would go further towards those objectives and with the option for five-yearly reviews, we can always revise upwards when and if necessary. Just today the government has rightly set out ambitious plans to make the UK carbon neutral by 2050. I believe that in seeking to regenerate the Town Centre and protect the Green Belt, Warrington can play its part in moving towards a carbon neutral future.

As both a resident and an elected representative, I have spoken to hundreds of residents and followed the correspondence of many more. I appreciate that a Local Plan must be firmly based in planning policy and that any proposals may attract some conflict. These proposals however have attracted widespread disapproval. This disapproval is not borne solely out of NIMBYism. Rather it is the valid concerns of residents of Warrington who care deeply about the borough's heritage, its character and its future. They want a future which makes Warrington a great place to live, work and raise a family. They want a future which is sustainable economically, socially and environmentally. The proposals in the Local Plan and LTP4 do not offer such a future.

We can and we must do better. The people of Warrington deserve and demand it.

Kind regards,



Councillor Ryan Bate

Representing Grappenhall & Appleton Thorn

Liberal Democrat Prospective Parliamentary Candidate for Warrington South

Chair of Rethinking South Warrington's Future