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9th November 2021

Local Plan
Planning Policy and Programmes
Growth Directorate
Warrington Borough Council
East annexe
Town Hall
Sankey Street
Warrington WA1 1HU

By email: localplan@warrington.gov.uk

Re: Draft Local Plan 2021

Dear Sir/Madam

Thank you for the opportunity to comment on the Local Plan. Our observations are provided overleaf, from which we conclude that in its current form the Local Plan is **unsound**. In your subsequent deliberations, we would be grateful if you would take into account our comments in full.

Yours faithfully

Janet wells

Richie Wells

1. General

1.1. There remains an unwarranted fixation on economic growth at the expense of the Green Belt (even the postal address for making representations – the Growth Directorate – attests to this). This is out of step with the current and future economic climate, where climate change mitigation can be expected to require a much greater emphasis on sustainable development; and Greenfield development is inappropriate in the face of the well-documented impact on biodiversity[1] and the UK's diminishing level of food self-sufficiency and security. The former now stands at just 60% and has been steadily decreasing over the last 30 years when it was 78%[2].

1.2. Assessment of the housing need by the 'new' standard method overestimates the number of new dwellings actually required based on either population growth or jobs growth (see Section 2). Conversely, the urban capacity is underestimated (see Section 3). Taken together, this suggests that there is sufficient existing urban/brownfield site capacity to support organic growth, the only potential issue being the rate of delivery, which could be overcome by innovative thinking and proactive policy/planning.

1.3. Although climate change is considered, it is based on an outdated assessment and the measures proposed are insufficiently wide-ranging and do not go far enough given the latest predictions of anthropogenic impact[3], government policy and advice from the government's independent advisor[4] (see Section 5).

1.4. Releasing Green Belt land requires a robust demonstration of exceptional circumstances, which is lacking and not supported by the evidence of housing need/requirements and land availability assessment (see Section 4). Similarly, the evidence presented for the allocating of employment areas on currently designated Green Belt land is founded on circular aspirational logic rather than robust economic assessment (see Section 6). When this is redressed, it appears that the apparent shortfall can be met by currently vacant floor space.

2. Local housing needs assessment[5]

2.1. The 'new' standard method imposed by central government continues to use the 2014-based household projections, which are out of date and do not take into account the latest population projections. The latest 2018-based projections, which by definition take no account of post-Brexit or post-pandemic population reduction, demonstrate how inappropriate this method has become. The 2018-based data predicts 91,829 households in 2021, 95,843 households in 2031 and 98,856 households in 2039. This yields a yearly average increase of 401 households (compared to 715 using 2014-based data) over the first ten years or a total increase over the plan period (18 years) of 7,027 (compared to 11,774 using 2014-based data). Applying the affordability uplift (14.2%) produces a housing need of 458 per year over the first ten years[6], compared to 816, which is the figure used extensively in the development plan. In other words, there is no scientific (i.e. evidence-based) link between this 'stated housing requirement' and population growth. In no way does the stated housing need of 816 homes per year actually reflect Warrington's need for housing arising from population growth. Equally absent is any attempt to challenge the standard method.

2.2. The standard method calculates the average annual housing need using the 10-year projection of growth and dividing by 10. However, since the annual rate of Warrington

[1] Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, 6 May 2019.
[2] Agriculture in UK 2020, DEFRA, 2021.
[3] IPCC, 2021: Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.
[4] Independent Assessment: The UK's Net Zero Strategy, Climate Change Committee, October 2021.
[5] Local Housing Needs Assessment, WBC, GL Hearn, August 2021.
[6] Interestingly, this is similar to the average number of new completions over the last 5 years (487dpa), according to the LHNA Update, indicating that this is a realistic and achievable target.

household increase is steadily slowing, using this average for the second 8 years is inappropriate. Instead, published ONS data should be relied upon for this period.

2.3. Combining these two points implies a housing need of 458 per year for the first 10 years and 430 for subsequent years of the plan, or a total of 8,025. This is a reasonable, evidence-based deviation from the standard method (which is not, in any case, mandated by government); and can be justified on the grounds that the alternative is building on Green Belt land, which itself requires exceptional justification, and which an arbitrary housing target does not provide.

2.4. Such an approach necessarily puts greater emphasis on the economic assessment of jobs growth, which is based on an average of OE and CE forecasting, taking reasonable account of factors such as commuting, double-jobbing and unemployment (including the recent pandemic-related increase). This produces a baseline housing need of 696 new homes per year (or 12,528 over the period of the plan). However, although commuting uncertainty is addressed by sensitivity study, the underlying uncertainty associated with using economic projections is not explicitly identified. This can be addressed to some extent by calculating the housing need using OE and CE projections (rather than their average), which using the same methodology gives between 8,583 and 14,395 dwellings (i.e. 11,489 +/- 2,906 or 638 +/- 161 per year).

2.5. That economic forecasting is attempted over the plan period of 18 years is ambitious, given the large uncertainties, not to mention the inevitable downward pressure on the global economy arising from climate change mitigation (i.e. as economic growth is slowly replaced by sustainable growth). This should really be recognised explicitly by playing down the weighting given to long-term projections (e.g. beyond 10 years).

2.6. The evidence-based requirement to meet population growth of 8,025 dwellings (neglecting the effects of Brexit and the pandemic) is well within the stated urban capacity of 11,785 dwellings. Compared to the median estimate for housing required to support projected jobs growth calculated above (11,489), the stated urban capacity is similar (11,785) and might be cause for concern given the potential uncertainty, except that as Section 4 demonstrates, the urban capacity is significantly underestimated.

2.7. In the draft Local Plan, Table 1 applies an arbitrary increase of 10% to the identified housing need "to allow for market choice and in the event that specific sites do not come forward". This increase is not required by the standard methodology, which already includes an affordability adjustment (of 14.2%), and appears to be a mechanism for inflating the perceived Green Belt requirement, since the entire burden for meeting the additional allowance is met by the Green Belt (amounting to another 1500 houses). Moreover, as Section 4 identifies, the urban capacity assessment is conservative and does not take into account that year on year completions exceed projections by an average of 17%. Hence, no increase in housing need (or more correctly a reduction in urban capacity) is merited.

3. Urban capacity assessment

3.1. The draft Local Plan identifies an urban capacity of 11,785 dwellings derived from an updated Strategic Housing Land Availability Assessment (SHLAA). Notably, this document is absent from the index of evidence, although a 2020 report of the same name is available on the council's wider website. However, this report derives a total capacity of 10,430 dwellings over 15 years. Where does the figure used in the local plan come from? Is there a 2021 version of this report? What additional urban capacity is allowed for? Nonetheless, since no other evidence appears to be provided comments below refer to the 2020 version of the SHLAA.

3.2. SHLAA

- Although the SHLAA has been updated, para 2.11 makes clear that it still relies on the October 2016 call for sites. Why has this process still not been repeated recently to provide the latest land availability figures? NPPF guidance requires an annual review of land availability. Given the implications for the extent of Green Belt land required and

the exceptional circumstances necessary to prove this is the case, it seems imperative that the latest information is used.

- The period covered by the SHLAA (15 years) is inconsistent with the local development plan and more specifically, the 18 years assumed in calculating the total housing requirement. This mismatch exaggerates the shortfall, since in practice more brownfield sites would come forward over 18 years.
- NPPF guidance requires the basis for the land available assessment to be revisited if there is a housing shortfall, "for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements". Where is the evidence that this has been done?
- As one example of an unnecessary constraint, why haven't the large number of sites less than 0.25 ha in size been explicitly assessed? This threshold criterion is unchanged and is poorly justified (citing consistency with St Helens Council).
- As another example, why hasn't the constraint on employment areas been lifted, or at least considered on a case-by-case basis?
- A large number of sites are designated as constrained, but other than for Green Belt, there is very limited or no documented justification presented in Appendix 2 explaining why they have been discounted (as is required by the NPPF and stated in the Section 2.1 and para 2.44 of the SHLAA).
- Have all planning applications been taken into account? A simple search of the three towncentre sites listed as "in planning" in Appendix 4 reveals that only one out three appears to have been included in Appendix 1.
- From the evidence provided it is not obvious whether a review has been undertaken of the extensive land/plots that WBC own to identify suitable housing sites. Has this been completed and taken into account?
- Has land previously designated for the Port Warrington development been considered?
- The latest masterplan available on WBC's website claims a total of 8,000 new homes by 2040. Although this version of the SHLAA purports to have taken into the towncentre masterplan, it is not obvious that this is comprehensively and consistently the case. It would be helpful if this were made clear – for example by listing all planned residential developments and cross-referencing to the relevant entries in Appendix 1.
- The SHLAA admits throughout that it has taken a cautious approach, which under normal circumstances, would be applauded. However, when deciding the fate of existing Green Belt, a best estimate approach is more suitable. Table 3.8 quantifies the conservatism implicit in historical projections of completions. Its data suggest that on average the actual number of completions is 17% higher. For decisions concerning the need or size of Green Belt release, SHLAA predictions should therefore be grossed up by 17%.
- Given the exceptional circumstances needed to release Green Belt land, what pro-active steps have been taken to bridge the apparent shortfall in housing supply, for example:
    - A further general call to developers and landowners – there is no evidence of this occurring since the last Local Plan
    - Identification of land-banked brownfield sites, followed by targeted approaches to landowners and if necessary compulsory purchase (as required by para 121 of the NPPF 2021)
    - Considering the extent to which office-space could be repurposed, noting that several recent developments have done just that (as evidenced by Appendix 4).
    - Bringing forward longer range towncentre residential development currently outside the period of the plan
- Overall, mainly due to the pessimism of assessment, the restriction on timescales (15 years) and the potential for further sites to come forward, or to be pro-actively brought

forward by policy, it is concluded that the SHLAA significantly underestimates the number of new dwellings potentially available from existing urban areas/brownfield sites. For example, grossing up the SHLAA 2020 total for 15 years by 17% and simply adding the current yearly completion average of 550 (deduced from Table 3.8) for 3 years gives 13,854 homes. Alternatively, assuming housing becomes available at the same rate throughout the plan period gives 14,644 homes, noting that the identified forward land supply (Table 3.9) has appeared to be reasonably stable over the last 5 years (at between 9,000 to 10,000 homes). Using the figure of 11,785 dwellings cited in the draft Local Plan (assuming this is sound), grossing up by 17% and adding 3 years at the current yearly completion average yields 15,440 homes. Or alternatively, assuming the same rate of delivery throughout the plan period suggests 16,546 homes.

3.3. Wider Urban Capacity

- The draft Local Plan and supporting evidence does not identify what additional urban capacity might be available over and above the constraints of the SHLAA. Given the apparent housing shortfall and the impact on protected Green Belt land, why hasn't this been done (or if it has why isn't it reported together with robust evidence)?
- A 2019 freedom of information act request identified that 2,482 residential properties stood empty[7]. One might imagine that this figure is no better today, given the impact of Brexit and the pandemic. Why isn't this intrinsic existing housing capacity taken into account and why is WBC pro-actively unlocking such opportunities rather than seeking to build new homes on Green Belt land? Whether through refurbishment or redevelopment, every single unoccupied residential property should legitimately count towards the urban capacity.
- As noted above, given the current trend of converting office space into residential accommodation (as evidenced by recent planning applications and supported by the refreshed EDNA, which found a reducing demand for town centre offices and more generally an increasing supply of vacant industrial and office premises amounting to 248,000 and 70,000 sq m respectively), why hasn't considering been given to repurposing empty offices or developing underutilised employment areas to provide further urban housing capacity? For example, if just 10% of vacant industrial premises were redeveloped to provide housing, this would provide an estimated 620 new houses or 1,612 dwellings in the town centre[8] (or 1,116 is these estimates are averaged, say). Similarly, if just 10% of vacant office space were repurposed, this would potentially provide 77 two and three bedroom flats on a conservative basis.[9]

3.4. Summary

- The stated urban capacity of 11,785 dwellings is poorly supported by evidence and grossly underestimates the available housing. On a best estimate basis, the data provided in the SHLAA supports an 18-year delivery of at least 15,440 new homes. If this is supplemented by empty residential properties (using 2019 figures), this yields an urban capacity of 17,922. If 10% of surplus employment land is also repurposed or redeveloped this implies a total urban capacity of at least 19,115, assuming all of it could be brought forward in the plan period. This amounts to 30% more than the stated housing requirement of 14,688; 2.4 times the housing need of 8,025 calculated by household growth forecasting; and 1,5 times the housing need of 12,528 calculated by jobs growth forecasting (see Section 2).

[7] Warrington Guardian, 6 February 2019.

[8] This assumes a typical ratio of 2,000 sq m per hectare for industrial premises (based on WBC's Employment Land Position Statement 2014,) and 50 dph or 130 dph in the town centre.

[9] This assumes a one to one correspondence between existing and converted floor area using an average of 90.5 sq m per dwelling based on the national minimum space requirement for 2 story 2 and 3 bedroom flats (79 and 102 sq m from Table 1, Technical housing standards – nationally described space standard, March 2015, Department for Communities and Local Government).

4. Green Belt

4.1. Under the NPPF 2021, redrawing the boundaries of Green Belt land requires the demonstration of **exceptional circumstances, supported by full evidence and justification**. This must also include a demonstration that **all other reasonable options have been examined fully**; and that the development strategy makes **as much use as possible** of suitable brownfield sites and underutilised land.

4.2. These criteria have not been met. More specifically:

- The evidence presented does not support the claimed housing requirement (see Section 2).
- The urban capacity assessment is not comprehensive in scope or timespan and, as a consequence, underestimates the available housing capacity (see Section 3).
- There is no evidence that **all** brownfield sites and underutilised land have been identified or that WBC has been at all pro-active in approaching the owners of land-banked sites; or taken measures to unlock or compulsorily purchase land to meet requirements in accordance with para 121 of the NPPF 2021 (see Section 3).
- There is no demonstration that site assessment constraints have been revisited once it became apparent that urban capacity was insufficient (see Section 3).
- The **absence** of a plan for Warrington General Hospital is a serious omission, given its importance for the region's healthcare and its potential impact if relocated – releasing further urban land for housing and possibly requiring Green Belt land for a new site.
- The draft Local Plan cites (e.g. para 5.1.5) the requirement for more affordable housing as part of its justification for releasing Green Belt land. However, the largest release is planned for South Warrington, where house prices are highest. The LHNA shows that the price of accommodation is cheapest in the town centre and implies this is the most realistic site for affordable homes.
- The employment land need (which requires Green Belt release to be met) is based on extrapolating historical land take-up rather than an objective economic assessment, which has been positively excluded (see Section 6).
- The majority of Green Belt land targeted for release is the furthest away from the town centre and will promote rather than reduce the use of cars for visiting and working in town, aggravating congestion and air pollution, which are already at unacceptable levels.

4.3. Where are the specific assessments that identify the impact on wildlife, their natural habitats, endangered species, biodiversity in general, ancient woodland, hedgerows and agriculture. Where is the evidence that the conclusions from such assessment have been taken into account in decision-making?

4.4. Having identified the 'need' to release Green Belt land the local plan does not **prioritise** building on existing brownfield sites as it should during implementation of the plan. This principle is enshrined in the NPPF 2021. Instead, WBC relies on new building on Green Belt to accelerate housing delivery early in the 18-year plan.

5. Climate Change [NEEDS UPDATING]

5.1. With the continued lack of leadership on climate action from central government, distracted as it is by the protracted Brexit process, WBC has missed the opportunity to plan decisively for the borough's low carbon future. This is the hallmark of responsible and visionary leadership, displayed by cities such as Nottingham and Bristol, who are aiming to become carbon neutral by 2028 and 2030, respectively. Such commitment recognises the ultimate challenge of the UK becoming carbon neutral by 2050, as recently advised by the UK government's Committee on Climate Change in light of the IPCC's assessment of mankind's still increasing impact on global climate. In contrast, WBC's commitment appears to be limited to the provision of (unspecified in number) EV charging points in the town centre, a requirement for 10% of energy from new developments to derive from

renewable sources, and more emphasis on walking, cycling and public transport as modes of transport.

5.2. Aspects that appear to be substantially lacking in the plan are:

- Encouraging micro-generation – why aren't all new developments (domestic and commercial) **required** to maximise their use of low carbon technologies such as PV solar and storage batteries, thermal solar, heat pumps, etc? This is a small fraction of the purchase cost. How can WBC incentivise existing households and businesses to do the same (e.g. discounts on council tax or business rates)?
- Home insulation New Builds – are building regulations sufficient or should further requirements be placed on new developments? With the Government relaxing building regulations somewhat around Climate regulations new builds need to be built correctly and properly insulated (as shown on recent BBC News Item and Guardian) https://www.theguardian.com/commentisfree/2021/sep/28/britain-homes-energy-crisis-governments-insulation-low-carbon-heating
- Home Insulation Existing Housing - What can be done to incentivise existing home owners and businesses to better insulate their buildings? E.g Oxford Council Retro Fitting Insulation in Homes https://www.bbc.co.uk/news/uk-england-oxfordshire-56138017
- EV take-up – Given the phasing out of new petrol and diesel fuelled cars and vans by 2040 (and the desire for this to occur sooner) how can WBC incentivise residents and visitors from the wider area to switch to EVs? Some examples: unrestricted use of bus lanes, free parking, free charging, free charging at park and rides.
- EV charging network – how will the growing requirement for public and domestic charging points be met?
- Electricity distribution – at least a doubling in capacity is predicted to support the switch to EVs and replacement of gas-fired heating. Is this taken into account in all new developments? How will the existing network be upgraded without causing major disruption? Can this be minimised by co-ordinating with planned development?
- Move away from natural gas – How will this be achieved (e.g. heat pumps, district heating, electric heating, hydrogen)? What does this imply for new developments and infrastructure? How will the recent announcement in the Spring Statement that new homes from 2025 will be highly efficient and will have low-carbon heating from the outset be implemented? What does this imply for Warrington as a whole over the period of the plan?
- Low carbon economy – how can WBC incentivise businesses linked to decarbonising? E.g. discounts in corporates rates for renewable businesses, use of renewable energy sources etc.
- Has biomass energy production and district heating been considered (e.g. using sustainable fuel, or municipal waste and carbon capture)?
- Isn't it time to reassess the viability of renewable energy development in the area?
- What scope is there to incentivise carbon capture and storage schemes in the area – as part of energy production (see above) or industrial processes?
- Afforestation – Has afforestation been considered, either as a carbon sink, or for sustainable uses?
- Agriculture – what can the borough do to encourage low carbon farming practices?
- Air quality – Air quality improvements predicted by the Local Plan Air Quality Modelling over the period of the plan take credit for assumed improvements in vehicle technology. However, this depends on consumer take-up, which is beyond WBC's control given its current policies.

5.3. As part of a joined up plan, delivered in part by the Local Plan, transformation to a low carbon borough can also have a positive economic benefit. For example, if Warrington became a leading developer and user of low carbon technology, associated Warrington businesses could help support the transformation of the North West, the UK, and overseas.

Has WBC considered creating a centre of excellence for low carbon research and technology?

6. Economic Development Needs Assessment

6.1. The mainstay of evidence for employment area land need is the refreshed EDNA[10]. This considers both analytical forecasting from OE and CE (based on projected growth and employment change) and historical evidence of take-up over the last 20 years or so (as summarised in Table ES1). OE and CE backed estimates of the employment area land need are reasonably consistent and lead to calculated shortfalls ranging between 6.5 to 36 ha. In the words of the EDNA, "The Oxford and Cambridge Forecasts represent two realistic projections for how jobs might change in Warrington to 2037, reflecting factors such as the economic impacts of Covid-19 and the Christmas 2020 Brexit Deal…". It is therefore surprising that these forecasts have been entirely disregarded in favour of the most generous historical forecast (predicting a shortfall of 277 ha based on 24 years of growth), which uses the simplistic assumption that forward growth will mirror past growth. This assumption is invalid both nationally, considering factors such as Brexit, the ongoing pandemic and climate change, and locally as outlined subsequently. Also of note is that since the OE and CE forecasts are used elsewhere in the LHNA, to disregard them in the EDNA is to arrive at a plan which is inconsistent and not backed consistently by scientific evidence.

6.2. In reaching its conclusions, the EDNA pays lip service to the most recent trends, which show a notable decline in demand/take-up, including:

- Council enquiries, Figure 1, which dropped by almost two thirds from 2016/17 to 2020/21.
- Number of deals, Figure 3, which has fallen for 3 out of 4 property types from 2015.
- Floor space transacted, Figure 4, which has reduced over the last five years even taking into account the recent uptick from filling Omega, which skews the local trend considerably.
- Value of investment deals, Figure 5, which has fallen sharply from 2014 when corrected for the sale of Birchwood Park to the council, which is not market-led, and is now at its lowest for twenty years.
- Vacant industrial floor space, which has risen from 82,000 sq m (2016) to 173,000 sq m (2019 EDNA Update) to 248,000 sq m in February 2021(Table 3).
- Vacant office space, which has risen from 49,000 sq m in 2019 to 70,000 sq m in February 2021.

6.3. The argument put forward that declining take-up is due a lack of availability and choice is not supported by other evidence (as listed above), most poignantly a year-on-year increase in vacant floor space. Para 8.9 somehow concludes that 13% vacant industrial floorspace "points to a lack of availability and choice". To put this into context, this equates to approximately 125 ha, which is 3.5 times the shortfall predicted by the highest of the economic forecasts (36 ha).

6.4. No robust evidence is provided of genuine market demand (noting that anecdotal comments from property agents are an unreliable means of market assessment, given their vested interest).

6.5. The EDNA also admits that competition for logistics and warehousing business will be high given existing and future developments in the area (Omega, Omega extension, Ma6nitude (Middlewich), Parkside (St Helens), Port of Liverpool and several in greater Manchester) and describes the opportunities for Warrington as modest only. However, there is no assessment of this risk and its impact on the planned M6/M56 employment area or, indeed, the existing Omega complex (and its extension).

6.6. Moreover, in the three years following the opening of Omega North (2015), it is notable that Warrington LA's employment rate steadily fell from a peak of 105,600 to 101,400 in

[10] Warrington EDNA Refresh, WBC, August 2021.

2018[11] despite the new employment development in the area (e.g. Omega)), which suggests that Omega North had little or no impact on direct employment. Given the ready access to surrounding areas, this is of little surprise. Similarly, any new, similarly located/connected logistics and warehousing facilities **without adjacent affordable housing** are unlikely to benefit Warrington directly, and certainly not on the South side, where house prices are the highest.

6.7. Noting the clear downward trend and economic forecasts, the evidence presented is insufficient to support the level of employment area land recommended to be set aside, particularly since the majority is currently Green Belt land, which is protected anyway (and therefore does not need reserving as an employment area). The Strategic/Local Take-up model should therefore be discounted.

6.8. Overall, the economic forecasting evidence presented supports an employment area shortfall of somewhere between 6.5 and 36 ha. However, this does not take into account the extent of current vacant floor space, which is more than sufficient to accommodate the shortfall many times over. Where premises quality may be low, clearly it is a matter of principle to refurbish or redevelop existing sites rather than encroach on Green Belt land and exacerbate the number of empty premises.

[11] NOMIS, www.nomisweb.co.uk