



Andy Carter MP

Prof S Broomhead
Chief Executive
Warrington Borough Council
Town Hall
Sankey Street
WA1

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Dear Stephen

I wish to make the following observations about the Warrington Local Plan Proposed Submission Version 2021, but before I deal with the specifics of the Plan, I wish to register my concern in relation to the consultation process.

Failure to Consult

I note with interest that the Council decided to hold consultation events in one location, at the Halliwell Jones Stadium rather than within the communities that will be most impacted by the proposals included within the draft submission version, in particular Penketh where development is planned on the former Fiddlers Ferry Site and in South Warrington where more than 4,200 homes are planned for Green Belt sites. I consider this decision to be at odds with the democratic process and prejudicial to those residents who live in this part of the Borough.

Indeed, the only events held in the neighbourhoods most impacted were organised by opposition Councillors, no Officers attended to provide an explanation as to how the plan could be delivered to local residents. Given the significant interest in this local plan I very much hope you will recognise the need to provide timely and useful engagement with those communities in the months to come.

Assumed Economic Growth

Turning to the Plan itself, I question its soundness and the premise upon which many of its policies are based. I am concerned that the assumed economic growth is over-estimated and there has been no reassessment of the situation following the Pandemic, despite evidence suggesting that there have been significant shifts in the working practices of companies and individuals.

It also is interesting to note that the employment land allocations outside the Town Centre are anticipating a growth in warehouse premises, which historically have been quite labour intensive. However, there is a significant shift in how these businesses operate with a far greater level of automation with a commensurate reduction in the staff required. I noted in comments during the recent Warrington Business Conference that there is a need to secure jobs locally which are highly skilled,



commanding higher salaries in addition to roles in the logistics sector which have lower levels of remuneration.

This potential reduction in the number of jobs generated on any of these sites will in turn reduce the demand for new homes. Therefore, the level housing need generated by the new out-of-town employment sites within the Plan are likely to be much lower than that anticipated by earlier iterations of the Plan.

Making incorrect assumptions about the growth of Warrington's economy will have a direct impact upon any housing figures.

New Homes Build Out Rates

I am concerned that recent build-out rates within the Borough of only 458 units per annum, well below that previously estimated, yet the Local Plan is proposing a figure which is almost double that currently being achieved. I am concerned that by adopting an unrealistic level of housing provision, the plan will have a built-in flaw causing a knock-on impact on its objectives.

If the Plan is looking to provide more homes than the market can accommodate, this will put a disproportionate pressure on the allocated sites within the Green Belt, whilst at the same time not securing the housing-lead redevelopment it is looking to achieve on brownfield site' especially those in Town Centre locations.

Future changes to Housing Needs Assessment

I understand from my recent meeting with The Housing Minister that there is likely to be a review of how housing needs targets are calculated going forward. I would urge that these changes are carefully considered and incorporated into the plan before the submission version is made available to the Inspector for consideration.

Brownfield First Approach

The current proposals are prejudicial to a 'brownfield-first approach, Therefore, I would urge the Council to specify time-tabled policies which will prioritise the development of brownfield sites over sites in the Green Belt to overcome the potential problems associated with an over-provision of housing sites.

In addition to the overall housing land supply situation there is also a problem with the location of so many housing sites on the edge of the existing settlement area, with a disproportionate number in the south. These sites are not sustainable and present several environmental issues which are at odds with the Climate-crisis agenda being perused at local and national levels.

Proposing houses in areas which are too far from facilities to enable ready access by foot or cycle, will either require a comprehensive public transport system or result in an over-reliance on the private car. The policies in the Plan are not specifically requiring the provision of a public transport network to serve the housing development to the south.



A lack of public transport will mean residents in these out-of-Town locations will have to travel by car, overloading an already congested road network. This situation will be further exacerbated by a lack of additional vehicular crossings over the Canal.

Failure to address Poor Air Quality

This additional vehicular traffic will also present a problem with air pollution, especially at the bridge crossings in Walton, Stockton Heath and Latchford where the air-quality is already at dangerous levels. Also, given recent legal proceedings elsewhere in the country it is important that the Council considers the environmental implications of its decisions especially those which could add to toxins in the air.

I also note with concern the level of new housing development proposed close to the M56 another receptor of pollution which will be detrimental to the air quality for those living in this location in addition to the significant harm caused by the persistent noise from the motorway.

While I appreciate that the Plan does include some improvements to the road network these will barely address the problems that south Warrington residents face today, let alone mitigate against the problems associated with the traffic generated by a further 4, 000 homes. Even taking account of the push towards more electric vehicles, the increased congestion will still include a significant proportion of non-electric vehicles adding to existing pollution levels.

Infrastructure Timing & Public Transport

If the residents of these new homes are going to be encouraged towards using more sustainable transport, especially walking and cycling, then the developments will need to include a range of facilities, including to serve residents health, educational and leisure needs. It is not clear from the policies within the plan that the developer will be required to provide these on site, in addition to any monies required through CIL or Section 106 contributions.

There is already an issue with the monies associated with these developer contributions either not coming forward in a timely manner, often well after the properties are occupied and even then, they do not often translate into the services that are required. I am mindful that this is an issues out with the Council's control and will be making separate representations via Michael Gove and other Ministerial colleagues.

If the Local Plan is going to meet its overall objectives of creating a more sustainable place to live and work and to address the problems associated with the Climate Emergency, then in the absence of any major expansion of the public transport network to the south of the Borough then it will be necessary to ensure that new development is concentrated around existing transport hubs. This is another reason why the Plan should propose that more new residential development should be on sites in the Town Centre.



Town Centre Living

This plan still does little to drive forward the economic prosperity of the town centre. While the provision of some higher density development in an around train and bus stations will afford an opportunity not only to provide local employees to live and work in the Town Centre but also provides an opportunity for Warrington residents looking to work or study further afield. The pandemic has drastically changed the face of retail and the plan fails to set out a clear strategic advantage that could be taken by taking a more ambitious approach to housing growth in this key zone.

Fiddlers Ferry

I also consider that the plan has missed an opportunity to secure the longer-term redevelopment of Fidler's Ferry site. This site is a large brownfield area, which enjoys existing transport links and as such would not only present a first-class opportunity for redevelopment but would reduce the need to release more Green Belt land. The site can accommodate additional development on brownfield, without the need to use Green Belt land.

Affordable Housing

The provision of more affordable homes will be a major challenge going forward and I am concerned that the proportion of affordable homes being proposed is insufficient. Only seeking 20% affordable new homes on Town Centre sites, where there is greater access to a wide range of facilities as well as good transport links while seeking 30% on the Green Belt sites looks to be somewhat perverse.

Unless the out-of-town development sites are going to provide the transport links and facilities to support the residents living in these homes, the people living in these locations will either spend an increasing proportion of their limited income on transport or become increasingly isolated.

Finally

This plan must be reframed in response to recent changes brought about by the Pandemic and shifts in Government thinking it will fail to provide the new development needed to meet its overall objectives and it will be a disaster for the whole Town.

There is no justification for the predicated growth in population and as a result the need for the volume of housing land and employment zones are not justified. Rather than focusing on brownfield development, the plan supports requests from developers by releasing significant areas of Green Belt without demonstrating that special circumstances exist. Of greatest concern is the complete lack of any plan to ease congestion on major routes through South Warrington, in fact this plan will make air quality worse and add to queues which already exist on roads which cross the Manchester Ship Canal and Bridgewater Canal.



I do not believe the plan is sound as it stands. To help you with this issue, I have written to both the Secretary of State and the Housing Minister to request that the

Government follows through with its public commitments to protect our precious Green Belt, by allowing Councils like Warrington more time to re-visit their Local Plans, taking account of the changes needed and recognising the need to better regenerate our town centre.

Yours sincerely

Andy Carter MP
Member of Parliament for Warrington South