

November 2021

WARRINGTON LOCAL PLAN 2021

Please find our comments on the WBC Local Plan, 2021. Our respective families have lived in the Borough for over 30 and 26 years. We are not affiliated to any political party. We are not planning experts, but we have many years of experience of developing strategy and investment planning.

In general, we are supportive of economic growth and affordable and good housing developments for the community. We support the concept of the Northern Powerhouse and Levelling Up. We disagree with the “not in my back yard” philosophy.

However, we believe that developments should provide overall benefits to the whole community, and they need to be achievable and sustainable. The benefits and negative consequences should be wider than financial benefits, they should cover a wide range of areas such as community needs, social mobility, the environment, economic growth, etc. In short, there must be a need to develop and economic and social benefits in doing so.

Our comments in summary are:

- We have several significant issues with the Local Plan, and we oppose its’ approval in the current form. It is flawed and therefore “unsound”; insufficient consultation has occurred; and WBC has not followed the revised planning approach released in August 2020 or considered the “Planning for the Future” white paper released at the same time
- We are not legal experts, and we are not sure if WBC has followed the legal process or not. However, we question legality of the actions taken by WBC to develop and destroy of greenbelt without reasonably justifying the need to do so or ensuring public support
- A more rigorous strategy for the long-term sustainability and development of all of Warrington should be developed, with meaningful public consultation, and with meaningful account of the ‘Climate Emergency’ which WBC has declared, before the Local Plan is further revised and approved
- No evidence has been provided that there is any justifiable need to develop any more of the green belt within the next 15 years
- WBC should not be able to approve any further green belt developments until the need has been clearly demonstrated and all options for brownfield development fully investigated and land utilised
- In addition, we would like to see the Executive and those Councillors responsible for the recent green belt developments be brought to account for the implementation of a flawed and unnecessary policy that has irreversibly damaged the local environment for this and future generations

We have spent significant time reviewing the Plan documents and other publicly available information from which we have prepared the following commentary. We have tried to take a logical, evidential approach, without emotion or bias. We have added in some screenshots of WBC and other publicly available documents to justify my statements. We believe that the evidence to reject WBC’s Plan is compelling.

OVERALL WBC APPROACH

WBC's strategy is based on the following logic:

1. Develop a strategy for the New City based on the assumption of achieving significant economic growth and revenue for the Council
2. Develop the Local Plan to support the New City, and setting housing and economic targets to meet the requirements for the New City
3. Accelerate housing and economic developments to attract businesses and migration before surrounding areas do so
4. Prioritise and approve green belt developments to ensure accelerated growth to enable the New City to progress quickly
5. To take the easy, traditional, approach of building on the green belt rather than a more creative and beneficial approach to a more sustainable future for the Borough

The following sections will demonstrate that WBC's approach is fundamentally flawed in several ways. These are summarised in the following sections.

I THE NEW CITY STRATEGY

WBC's stated mission is to develop Warrington into New City by 2040. To achieve this, it is necessary to develop economic sites and build a significant number of houses with some of these on the green belt.

This begs some fundamental questions. Is the New City the right thing to do? Is Warrington the right place? And is it worth building on the green belt?

I.1 THERE ARE SIGNIFICANT DEVELOPMENT ISSUES

The Council accepts that there are issues with the strategy for the New City.

Warrington is fundamentally not suited for development. The Mersey, Manchester Ship Canal, Bridgewater Canal are all major barriers to travel North-South across the town.

The Mersey flood plain is a significant part of the town's land and is not ideally suited to development.

Warrington is bounded by a strong motorway network. This is generally beneficial and supports economic development and transport links. However, when the motorway networks experience problems, then the consequences often result in major congestion throughout the town. The road network is both an asset and a liability to Warrington.

To improve the travel arrangements for the additional population and for economic growth this requires significant and costly infrastructure improvements. When compared to other areas for development in the North West, Warrington must be one of the most expensive areas to make transport improvements. WBC's business model gives a value of over £1bn.

But – Approaching Capacity

- New Town infrastructure not completed – highly congested
- Air quality issues
- Ship Canal swing bridges - poor network resilience
- Running out of land rapidly – both housing and employment
- New Town Infrastructure – expensive to maintain and needs renewing

**Key Northern Powerhouse & national growth engine
– at risk of stalling**



1.2 NO BUSINESS CASE FOR DEVELOPMENT

WBC's financial analysis shows that the New City programme is not financially cost beneficial. There is also no mention of the other community benefits or the social costs and dis-benefits, which would make the scheme even more uneconomic.

WBC is currently over £1.7bn in debt, and yet is planning large scale investments in the New City. The strategy that is being adopted is not financially sustainable, especially if the New City is known not to be financially cost beneficial.


WBC has got a poor track record for investing in developments. The Golden Gate and Time Square re-developments have many empty shops, the larger key brands have left, and the town centre is struggling.

These investments have suffered due to a combination of Covid-19, Brexit and online shopping as many other towns have as well. WBC's approach has been traditional, flawed, and wishful thinking. The investments have been significant, and the envisaged benefits have not materialised. The New City and the Local Plan are following the same route.

WARRINGTON NEW CITY BUSINESS MODEL – THE MONEY		
Summary Business Case:		
Life of Programme – to 2037 (20 years)	Capital (£)	Revenue (£)
Investment Programme Cost (incl. interest and risk allowances)	1,049,637,609	
Capital Income (New Homes Bonus, CIL/Sec106, public sector land value uplift, DfT funding, private sector Development Levy)	775,763,386	
Net Capital Surplus	-273,874,223	
Gross Additional Local Taxes (Council Tax & Business Rates)		842,059,540 (42m/annum)
Additional Services - Revenue Expenditure (to support new residents and businesses)		375,385,409 (18.7m/annum)
Net Additional Local Taxes (net additional income derived from growth)		192,799,908 (11.24m/annum)

Basis of Business Model:

- Aligning Government & Council owned land & assets
- Capturing the uplift in value of Govt & Council owned land & reinvest in infrastructure to enable growth
- Forward fund / cash flow infrastructure through aligning Govt programmes and Council Capital programme
- Council reinvests income generated from growth into community infrastructure & services that support growth

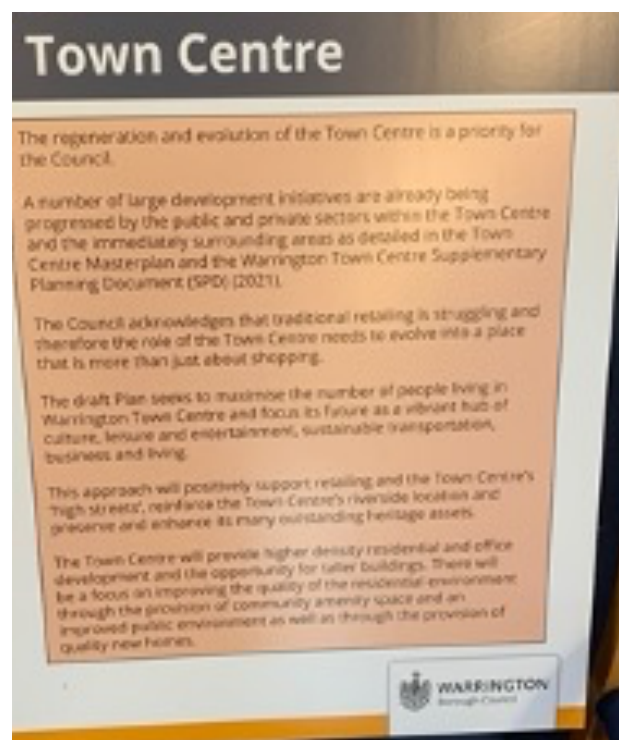


The UK Government uses the HMRC's Treasury's Green Book methodology to develop, test and justify strategic investments by government bodies. This shows best practice in how to develop business cases, through a structured appraisal and evaluation approach. The Green Book assesses the strategy through several different lenses: it evaluates different options; it uses cost benefit analysis; it is strong on public and stakeholder consultation; risk assessment; implementation planning; etc. It is an ideal framework to use to develop such a large development strategy.

WBC has not used this approach, nor many of the good practices within. The development of the New City Strategy is insufficiently rigorous to be valid when compared to the expectations of the Green Book.

1.3 LACK OF APPROPRIATE CONSULTATION

There has not been appropriate public consultation to see if the residents of Warrington support the New City strategy or not. No alternative options have been presented for discussion. It is a 'done-deal' by the Council. The community should have been asked if they are prepared to fund the New City strategy and face the potential consequences to Council services, congestion, loss of green belt etc. should it fail, particularly considering the existing borrowing commitments.



I.4 THE STRATEGY DOES NOT ADDRESS THE CLIMATE EMERGENCY

WBC declared a 'Climate Emergency' on 18th June 2019. The Local Plan is diametrically opposed to such an 'emergency'. A two-up, two-down house uses some 80 tonnes of CO² to construct (14/10/2000 Guardian article by Mike Berners-Lee).

The annual CO² impact will therefore be over 65,000 tonnes of additional CO² per annum. The reality is probably much greater due to the sizes of houses being proposed. House building should be minimised rather than maximised in a bid to gain City status.

In response to the Climate Emergency WBC has set out a 'Green Energy Strategy' paper, with one of the six goals of 'reducing greenhouse gas emissions'. Nowhere in this strategy document is there any reference to the impact of housebuilding, yet this is a major contributor to greenhouse gas emissions. The physical construction of the house is, however, only one element of greenhouse gas emissions. The on-going greenhouse gas impact is felt via energy use and inefficiencies within the dwelling. WBC, through its wide-ranging activities, should have a joined-up strategy which should result in minimising housebuilding, and where this cannot be achieved, dwellings should be built in the most environmentally conscious way. Neither the Local Plan nor the Green Energy Strategy achieve this joined up approach.

I.5 ALTERNATIVE STRATEGIES SHOULD BE CONSIDERED

Warrington town centre, as are so many others in the UK, is struggling. WBC acknowledges that a priority should be to focus on sustaining the town centre over the long-term. Town centre re-generation is a difficult enough and challenging task and requires a new approach and Council focus.

Many Councils are starting, with success, to do things differently. The ratio of shops to housing needs to change substantially in the town centre. Essentially the town centre has to become self-sustainable, with fewer shops, more restaurants, bars and cafes and more affordable housing.

There is land available to do this, but more innovative and urban developers rather than traditional house builders would need incentives to encourage them. WBC understands the challenge and is starting to develop a new strategy for re-generation, but this is not creative nor focussed enough to ensure success.

Should town centre sustainability be a higher priority than trying to grow and expand the surrounding area? WBC intends to invest £1bn on the New City with most on infrastructure for growth and out of town developments. It might be more cost effective to spend less with a significant proportion being invested within the town centre. These are key questions, and they are not being discussed.

The New City is not necessarily the answer, there are clearly other options, priorities, and issues to be addressed. These should be considered as options rather than bolted on to the New City strategy. A considered best use of the available funding should be determined and agreed with the public.

THE NEW CITY STRATEGY IS FLAWED AND “UN SOUND”

- The case for the New City is poor; it is not cost beneficial; it will destroy green belt; and it will increase the financial pressures on the already debt-laden Council and taxpayers
- There are alternative strategies that may be more attractive, viable and better suited to the meeting the needs of the communities across Warrington and the declared climate emergency that have not been considered in sufficient detail. A more rigorous long-term strategy for Warrington should be developed before the Local Plan is approved

- It has not been shown that the community supports the strategy or understands the consequences
- WBC's track record of investing in developments has been poor in some areas, which questions their ability to deliver the benefits from the New City strategy
- There is sufficient uncertainty to question that the New City will fully go ahead, and that any substantial benefits will materialise. It is possible that significant investments are made, the Council struggles financially, and the Borough ends up in a much worse place

2 THE LOCAL PLAN 2021

2.1 THE STRATEGY HAS BEEN SET FROM THE OUTSET

The Local Plan target is to build 816 dwellings per annum. This has not been set based on meeting an inherent need for the town, but rather for the desire to develop the New City.

When reviewing the Local Plan, it is very clear that the answer was pre-determined before the Plan was developed. The answer was for WBC to significantly increase the number of houses. The Plan was then developed to support this decision. If the decision to develop the New City is flawed, then the Local Plan is also, de facto, flawed.

2.2 THE STRATEGY IS TOO LONG-TERM AND INFLEXIBLE

It is possible to reduce or stop developments to adjust to economic and population growth. It is also possible to increase developments, albeit there could be a lag between the need and delivery.

It is logical, to plan over the long-term, and then also have flexibility over the shorter-term, where the developments are slightly leading the need by a few years. It also makes sense to prioritise the economic and housing developments and their implementation. On this basis, WBC agrees that the priority would be to utilise the brownfield sites first and leave the green belt sites until the needs showing signs of being materialised.

The Government's *Planning for the Future* white paper states that the planning process is not working. Notwithstanding, that the rationale for the paper, was because the Government wanted more houses to be delivered, it shows that the process needs to change.

One stated reason for this is because the needs assessments are uncertain and debateable, particularly because the planning horizons are so long. There is also mistrust of Councils, particularly with their intentions and looking after the interest of the wider community. Both of these reasons apply to WBC's Plan.

• Assessments of housing need, viability and environmental impacts are too complex and opaque: land supply decisions are based on projections of household and business 'need' typically over 15- or 20-year periods. These figures are highly contested and do not provide a clear basis for the scale of development to be planned for. Assessments of environmental impacts and viability add complexity and bureaucracy but do not necessarily lead to environmental improvements nor ensure sites are brought forward and delivered.

• It has lost public trust with, for example, a recent poll finding that only seven per cent trusted their local council to make decisions about large scale development that will be good for their local area (49 per cent and 36 per cent said they distrusted developers and local authorities respectively).⁴ And consultation is dominated by the few willing and able to navigate the process – the voice of those who stand to gain from development is not heard loudly enough, such as young people. The importance of local participation in planning is now the focus of a campaign by the Local Government Association but this involvement must be accessible to all people.⁵

It is clear that the Standard Method and the current approach is not really working and there must be a better way to develop the right number of houses in the right places. The changes to the Standard Method in August 2020, has been driven because as the Housing Secretary, Robert Jenrick, said *'the Government had "heard clearly" that the building of homes should not be at the expense of "precious green spaces" and could better be done in urban areas.'*

WBC did not taken the opportunity, when developing the new version of the Plan, to change its approach in changes to the Standard Model, use the latest ONS data, or in light of the areas for improvement discussed in the white paper, i.e., shorter planning horizons, more community engagement, and shorter and more readable planning documents etc.

2.3 THERE IS NO NEED TO BUILD ON THE GREEN BELT

The need to build on the green belt must be “exceptional” to justify the environmental loss to the community and future community. WBC has not demonstrated that there is a real need for this scale of development.

It is wishful thinking, of a Council that has developed a fixed agenda for a New City, rather than a logical, evidence-based, determination of a realistic need and an achievable strategy to deliver the need.

The need to build 816 dwellings per year has not been shown to represent a realistic forecast to meet the needs of the Borough. It is based on the Standard Method, with some questionable adjustments.

In essence it is about setting a target, and then justifying that there will be sufficient economic growth and migration to the Borough to support the housing developments.

The approach is logically flawed in that it does not establish the real “need” to build, it just sets a target (albeit, ironically, called the Objectively Assessed Need), and then tries to justify that the target will be met, i.e., if we build the houses, the people will come. There is no guarantee that this will happen or any consideration as to what happens if they don’t.


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|------|---|
| 1.22 | Taking account of changes to the economically active population, commuting patterns, double jobbing and unemployment, it has been estimated that between 696 and 765 new homes each year are required to support a jobs growth of 14,855. |
| 1.23 | Given current commuting patterns and estimates about double jobbing, it is estimated that just over 18,300 additional jobs could be supported by growth in the housing supply in line with the standard method-based HNF of 816dpa. This falls to 16,100 if commuting is assumed to be on a 1:1 ratio for new jobs. |
| 1.24 | Given that robust forecasts of employment growth are within the level of increase that would be supported by the delivery of 816dpa there is no justification to increase the housing requirement to support employment growth in Warrington over the Plan Period. |

It is worse than wishful thinking in that the WBC acknowledges that their housing target of 816 dpa will be able to support the need (696 to 765 dpa) from their economic growth projections. In other words, the target has been set too high in the first place.

It will be demonstrated later, that the economic forecasts used are questionable and probably significantly over-optimistic. This implies that WBC’s housing targets are grossly over-optimistic.

WBC has shown that it can provide around 15,000 new households without the need to build on the green belt. This is more than the 13,872 households forecasted as needed by WBC themselves.

WBC’s own numbers show there is no need to build on the green belt. When the uncertainties and optimistic estimates are considered in the calculation, there is clearly no need for any use of the green belt at this time.

WARRINGTON
Borough Council 

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Our Ref: MB/GB/17
Date: 26th March 2017

Dear Mr Fisher

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Warrington Borough Council Local Plan Review-Duty to Co-operate

Warrington Borough Council Housing Provision

Demand for housing land in the Borough of Warrington is high, as is developer interest in bringing sites forward. Although we continue to monitor land supply and the latest household projections, evidence is suggesting that we cannot accommodate our development needs of a minimum 20,000 new homes up to 2037 within the existing urban areas or Greenfield sites outside of the Green Belt.

Further on-going work has confirmed that the existing urban areas and Greenfield sites outside of the Green Belt can accommodate approximately 15,000 new dwellings. If Warrington is to meet its development needs in full it will therefore require the release of Green Belt land for development.

In line with the NPPF, a way of potentially reducing the need to release Green Belt land for development purposes is to explore the possibility of some of the housing need arising in the Borough of Warrington being accommodated in a neighbouring Local Authority area.

My reason for contacting you in this regard is that there is a degree of migration and day to day commuting between our Local Authority areas which suggests that some of the demand for housing in the Borough of Warrington may be capable of being met in your Borough.

I would be grateful for your view on whether there is a possibility that some of the housing need arising in the Borough of Warrington to 2037 can be accommodated in your area, so that we can take account of this during our Local Plan Review.

Since the 2018 plan was developed, the Fiddlers Ferry site has been made available for economic and housing development. This has the potential to increase the 15,000 available households by a further 1,800 households.

Even allowing for uncertainties, it is clear that use of the green belt is not required for at least 10 to 15 years, if not at all.

WBC has already released green belt for development and hundreds of houses have been built and are currently being developed. When factored in this increases the overall development capability of the Borough well beyond any realistic need.

It also raises the question of negligence of releasing green belt, when closer inspection of the numbers does not support the release any of the green belt at this stage.

In fact, Boris Johnson recently intimated that green belt developments will no longer be necessary to support population growth, presumably because of the 2018 ONS population projections and more recently because of the impact of Brexit and the new economic strategy post-Covid-19.

2.3 THE VALIDITY OF THE HOUSING NEED CALCULATION IS QUESTIONABLE

We understand that the Standard Method must be used to calculate the housing need. However, there seems to be some flexibility to adjust the forecasts. We have a fundamental problem with the approach as it should be constrained by the practicalities of making sure that the houses are actually required.

For example, there is no point in building houses if the population growth, age and working profile, and net migration are not sufficient to support the additional houses. The same applies if the economic development does not materialise, or if surrounding areas have more affordable or available housing stocks.

WBC's consultants have used the Standard Method to set the housing need for Warrington. This was set at 816 dpa for the period 2021 to 2038, equalling 13,872 additional houses. This implies a population increase of 22,300 or 11% increase. We have three fundamental problems with this calculation.

It is not clear as to how the value of 816 has been determined as the detailed approach has not been published. The Short Local Housing Needs Assessment Report suggests that an initial value of 715 has been used, which has been based on WBC's current development plans. This implies that the new target has been set on the existing rate of development, which WBC set by releasing green belt developments. Our first issue is that the value of 715 does not seem to reflect the actual need for housing, it is more a number that WBC has decided is required.

The 715 value has been increased by 14.2% because Warrington's median house prices are 7.27 times the median earnings as per the Standard Method. Increasing the value because of affordability might not be valid. It does not necessarily follow that if more houses are built then the residents will be able to afford them or necessarily move to them, they may move to more affordable areas in other Councils. Our second problems, is that even though the Standard Method prescribes this adjustment, it should be challenged to check that it is realistic and meaningful.

The consultants' assessment has used the higher 2014 ONS population forecasts rather than the newer, and lower, 2018 ONS data which was readily available in time for the development of the new Plan. In fact, the 2018 data was recommended for use by the Government in the August 2020 revision of the Standard Method. Our third concern is that the higher population forecast values were intentionally used to justify a higher housing need, rather than the newer, and probably more accurate, values, which was against Government advice.

The issues with the housing need calculation supports the observation, that WBC had decided the answer they wanted and then selected the evidence to support their strategy, rather than developing an unbiased assessment of the housing need.

2.4 THE HOUSING NEED IS VERY UNCERTAIN

There are significant uncertainties in the economic and population forecasts, particularly over the full-term of the Plan. The economic forecasts are very variable, which results in a wide-range in the housing need to support economic growth. The forecasts are highly uncertain, and therefore the Plan and the need for 816 dpa is also highly uncertain.

The Oxford Economics and Cambridge Econometrics reports have significantly lower forecasts than that used by WBC. WBC have not adopted these, although the forecasts have been proven to be historically accurate, and are acknowledged as being realistic, accounting for the impacts of Covid-19 and Brexit.

Labour Demand

- xiv) The second method looks at jobs growth, as identified in Oxford Economics and Cambridge Econometrics forecast modelling, an updated (2021) model which allows for macro-economic changes since 2019. As can be seen in Table ES1, the resulting jobs based forecast model suggests the Borough has much smaller land shortfalls.
- xv) 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, as they were understood in early 2021. However, to also consider some more optimistic scenarios for jobs growth, this study has also undertaken Sensitivity Testing relating to the SEP although this strategy is now of reduced significance in the present economic and policy climate (see Table ES1).
- xvi) In terms of jobs projections, the baseline Forecasts remain the more accurate as they are most up to date and allow for contemporary economic issues such as Brexit and the Covid-19 Pandemic. These forecasts give net needs of 15.04-27.49 ha and 42.48-44.60 ha on a growth only scenario. Taking a midpoint between the two would give needs of 21-43.50 ha.
- xvii) However, the market assessment, the impacts of the Covid-19 Pandemic on jobs densities and a review of the historic trends in employment change and land take up (see Section 7.0 of the Main Report) suggest that these forecasts underestimate land needs significantly. **The preferred forecasting method is therefore a projection forward of past take-up rates that considers both strategic and local needs.**

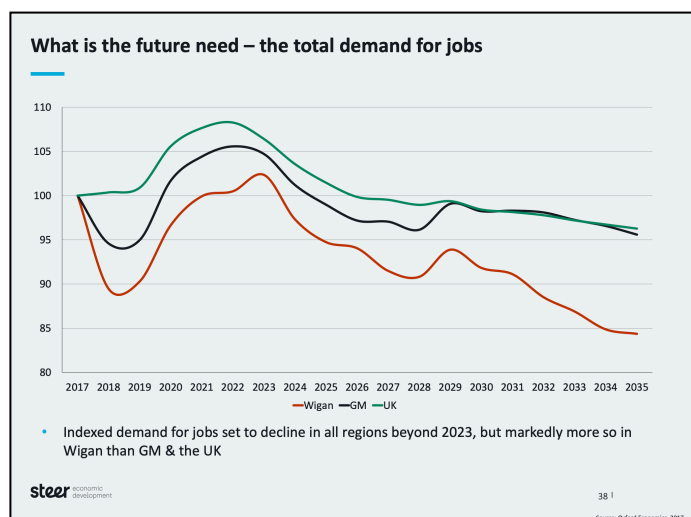
Instead, WBC has adopted an average value between the independent estimates in the reports and a forecast based on some historic information, which do not account for recent events.

How this estimate was developed is unclear. The selection of the economic forecast seems arbitrary, simplistic and has a significant level of uncertainty.

To demonstrate the level of uncertainty, WBC’s forecast for the land required for economic development is 277 ha, which is over 7 times the Oxford and Cambridge value, which ranges between 30 and 36 ha.

Some work by Wigan Council actually predicts an overall decline in the number of jobs in the region and the UK as a whole.

The Plan gives no indication of the employment numbers or the employment type and remuneration that the different zones will be expected to house the net migration. We suspect that there is a mismatch between the types and location of the new jobs and the housing types being developed, i.e. the jobs are in North Warrington and the new houses are in South Warrington; the new jobs are relatively few and unskilled, and the new houses may not be affordable to the workers.



The population and household forecasts are also uncertain. The latest, 2018, ONS estimates vary significantly from those assumed by WBC. The previous ONS forecasts also showed significant variations from the WBC values. In fact, the 816 dpa target has been used to back-calculate the forecast number of households and hence the required population growth.

The housing strategy should be flexible and adapt as the uncertainties unfold. At the time of writing, the impact of Covid and Brexit are very uncertain on the economy, and population growth, two key factors that will drive the housing need and specifically whether the green belt is required or not.

2.5 THE PEOPLE MIGHT NOT COME

WBC assumes that there must be net migration from surrounding areas, other parts of the UK and/or overseas. The migration needs to be significant. WBC's strategy requires that if they build the houses the people will come, but not exactly knowing as where they will come from, and with no evidence to suggest that the people will actually exist or be attracted to the new jobs in the Borough.

It will be shown later that the net migration is unlikely to materialise as most other Councils in the country have also planned for net migration and the overall net overseas migration is actually forecast to decline. Historic migration levels to the Borough have not been at the necessary level to meet the housing developments.

2.6 WBC IS COMPETING WITH SURROUNDING COUNCILS

Because WBC has developed its Local Plan based on a) achieving the New City, and b) a need to attract large scale economic growth and net migration, it has to race and compete against the surrounding Councils to attract businesses and workers.

WBC is intentionally competing with surrounding Councils to attract businesses and people. To achieve this, WBC's strategy has been to accelerate developments, and the easiest way to achieve this is to develop on the green belt. The green belt sites are quicker and easier to develop on a larger scale. Whereas the Council claims that it will protect the green belt first, its actions have been exactly the opposite with several green belt developments having been approved already and green belt areas under currently development.

Mr Patel, who has responsibility for the Plan, said *'no-one wants to build on green belt land, and we will do everything we can to minimise this, but we are hampered by government housing targets.'* This statement is not true, for three reasons, because a) the surrounding Councils are planning to over deliver the government housing targets for the region; b) WBC could minimise the impact on the green belt by delaying the green belt developments; and c) WBC acknowledges that there is no need to use the green belt to achieve its target of 13,872 additional households.

Whilst this is not necessarily a bad thing for WBC to compete and endeavour to develop the Borough, is it worth losing the green belt, which will be lost for ever? The residents have not been given the opportunity to give their views on this strategy, and WBC are saying one thing and doing the opposite.

2.7 POOR ALIGNMENT WITH SURROUNDING COUNCILS' PLANS

We have undertaken analysis of the Council plans that border with Warrington. St. Helens, Halton and Wigan work closely with Merseyside to develop an aligned strategy for the sub-region. Similarly, Trafford and Salford work with Manchester. Cheshire East and West work together. Warrington is not formally part of any of the surrounding Local Plans. It is effectively working alone.

However, WBC has and does, to some extent, consult with these Councils, but this is piecemeal. This has not resulted in either much cooperation, or a joined-up strategy. WBC's main consultation on the Local Plan with the surrounding Councils is to ask if they can support any of Warrington's housing need.

The analysis shows that most of the Councils are planning their own extensive economic and housing developments and hence, predictably, respond that they cannot support WBC. Some have not even bothered to respond.

The lack of coordination across the region is clear, as each Council has set dwelling targets that are above the population growth in their areas. They almost all assume that there will be a net migration from surrounding areas to their area.

The pattern is the same for other Councils in the North West region. They cannot all be successful in attracting the additional population they predict.

In essence, the Councils are actually competing to attract people to live in their areas. The actions of WBC are more competitive rather than coordinated as required by the Localisation Act of 2011. This is demonstrated by the fact that there are all approving green-belt developments to race to build more houses. The fundamental question, is how many of these green belt sites are actually required for the population growth across the wider region?

2.8 WBC HAS HISTORY OF DEVELOPING MORE HOUSES THAN PLANNED

Since 2009, WBC has historically developed more houses than planned. On average 15% more dwellings have been built per annum. It is not clear as to the reasons why there is over-development. Has this been intentional, or uncontrolled?

The historic rate of housing development is also seen to be significantly less than the new, step change, increased target.

Year	Projected	Actual	%	Additional
2009/10	306	388	27%	82
2010/11	435	527	21%	92
2011/12	563	600	7%	37
2012/13	643	647	1%	4
2013/14	578	693	20%	115
2014/15	612	687	12%	75
2015/16	458	595	30%	137
2016/17	366	513	40%	147
2017/18	318	359	13%	41
2018/19	404	503	25%	99
2019/20	587	541	-8%	-46
	5270	6053	15%	783

Additionally, any trendline through this data shows at best a stable trend in the actual built properties and possibly a declining trend based on an average of 550 dpa. This is substantially lower than the proposals in the Local Plan.

2.9 THE POPULATION FORECASTS ARE NOT REALISTIC

The 2018 ONS forecast is for the UK population to increase by 9.2% between 2021 to 2038. England is forecast to grow by 6.6% and the North West by 5.5%. Warrington is only forecast to grow by 2.4% over this period equating to 5,150 people. The Councils that directly neighbour Warrington range between 4.4% and 9.6%, averaging 6.0%.

The WBC plan forecasts a population increase over the same period of 22,302 (10.6%), which is based on the 816 extra dwellings/yr. This implies an average household size of 1.6 people for the new houses. The ONS statistics for population and households gives an average household size of 2.4 people in 2017 decreasing to 2.3 in 2038 for England. For the North West the numbers range between 2.35 to 2.26. For Warrington and the surrounding Councils, the numbers are 2.3 decreasing to 2.2. WBC's Plan equates to only 1.95 people across the whole Borough. This means that the Local Plan is likely to underestimate the population required to support the new houses.

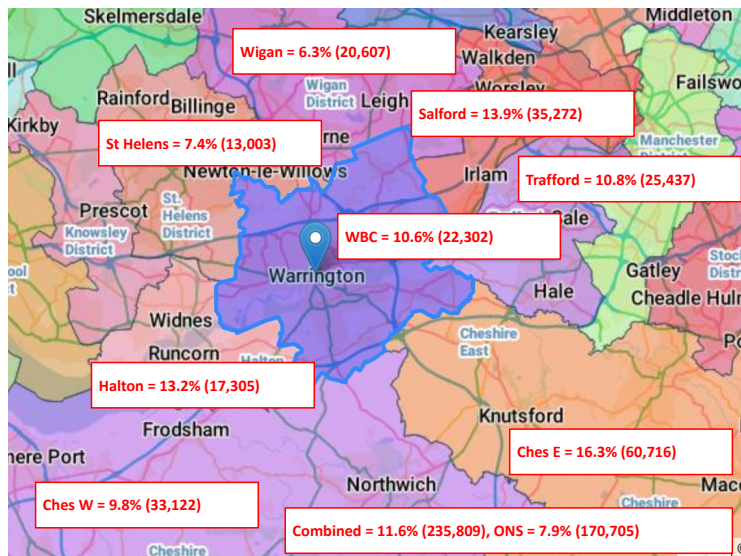
Or to put it another way, more people must migrate to the Borough to fill the houses being built. For Warrington, the ONS gives a forecast for the average household size of 2.2. Using this WBC population forecast would increase to over 30,600, which is almost 6 times ONS value and an increase of 14.5%, which is higher than ONS's extreme "High" population forecast for the UK as a whole. The population growth in the Borough is extremely unlikely to materialise to meet the housing developments. More likely, the housing developments will be significantly decreased in a few years' time, by which time green belt will have been unnecessarily destroyed.

There is a significant discrepancy between the latest ONS population forecasts and WBC's expectations. The ONS population forecast equates to circa 137 dwellings/yr, presumably with the WBC relying on changes in household sizes, population profiles and net migration to fill the additional 679 dwellings/yr (25,000 people). The majority of this would need to come from economic development and net migration from the surrounding Councils, the UK and overseas.

The Localism Act 2011 requires Councils to work with neighbouring councils when developing their plans. It is clear that Councils have not sufficiently aligned their plans to develop an over-arching, achievable plan.

Instead, their actions seem to be to compete for attracting people to live in their areas. Unfortunately, this is at the expense of the green belt and not for the good of the community as a whole.

The WBC forecasted population increase is extremely unlikely to materialise as all surrounding Councils also intend to build housing for higher populations than those forecast by the ONS. In most cases, the Councils also forecast significantly higher than the ONS values. Warrington and the surrounding Councils forecast a population increase of 179,000 between 2021 and 2038 compared to the ONS forecast of only 125,000.



The population over-estimates are also found when the area is expanded further to cover Merseyside, Greater Manchester and the North West as a whole. We suspect that this applies to most of the UK.

However, you look at it, overall, there are clearly large uncertainties in the population growth forecasts and most of the nearby Councils are all forecasting positive net migration into their areas. It is not possible for all of the Council plans to succeed.

A report by Turley in May 2020 looked at the Council plans for the North West as a whole. Collectively, the Councils are planning around 34,000 dwellings per year. This exceeds the Government target for 300,000 additional dwellings per year, when scaled (by population), which is 22,800 per year for the North West. This is 50% over the government target.

Because WBC has one of the most optimistic plans; with them working in isolation; and requiring very high infrastructure investments; it is the Council mostly likely to fail in its strategic objectives.

2.10 THE HOUSEHOLD FORECASTS ARE UNREALISTIC

The ONS also forecasts the number of households. These show similar discrepancies with the Councils' forecasts, basically, because most of the Councils are planning to build significantly more houses than required by the natural, local, population growth.

The ONS forecast that England will increase the number of households by 13.6% between 2017 and 2037, and the North West region by 10.9%.

Warrington is forecast to grow by 9.3% over this period equating to 8,339 households or 417 dwellings/year on average. The Councils that directly neighbour Warrington range from 10.6% to 16.2%, averaging 12.6% equating to 84,971 new dwellings.

WBC is planning to have 107,000 households by 2037, which equates to 18.2% increase from 2017 values, which is twice the ONS forecast. Planned developments in the surrounding Councils show the same trend with higher than ONS household forecasts. Again, the same pattern is seen across the North West region.

2.11 PUBLIC CONSULTATION HAS BEEN POOR

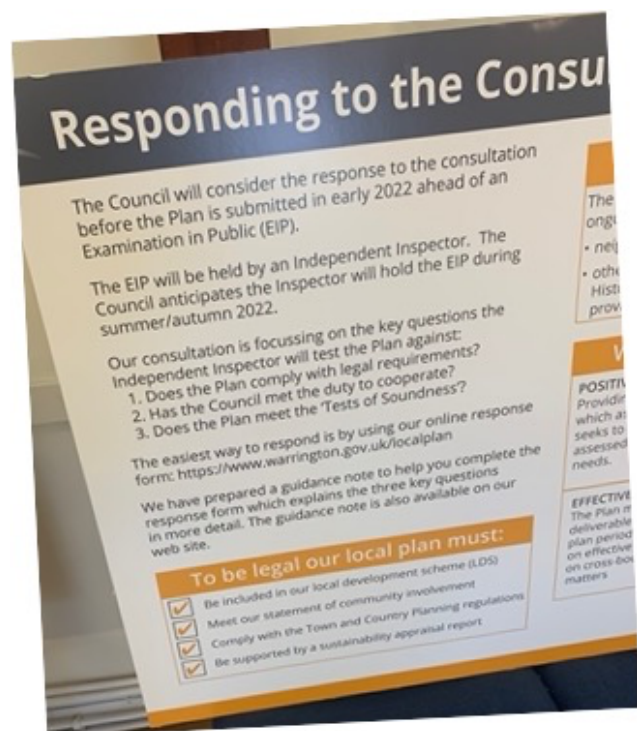
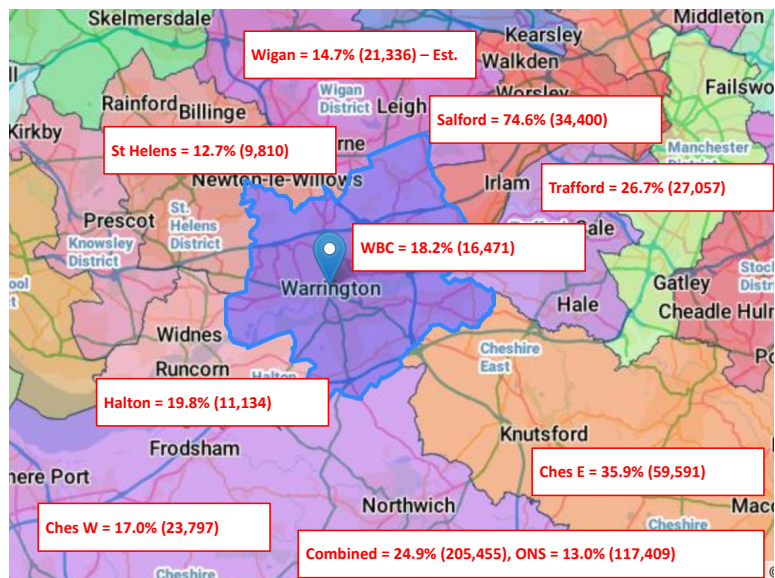
The public consultation on both the 2017 Plan and now the 2021 Plan has been limited and designed to ensure that the WBC's Plan goes ahead. The consultation activities are limited and have not been widely publicised. The process is designed for consultees to show that WBC has legally complied rather than genuinely solicit views and preferences. There has been no consultation during the development of the Plan, only at the end with a view to minimise damage from the consultation process.

The development of the Plan has not been based on public consultation; it has been based on delivering the New City. Choices and options have not been sought, nor objections and issues encouraged.

Consultation responses from the 2017 Plan were reviewed and responded to in the 2021 Plan. In general, the responses show intent to address the issues, e.g., lack of infrastructure, use of green belt, congestion etc., but no concrete commitment or action has been provided. For example, WBC has stated that brownfield developments are prioritised over green belt. However, their actions so far have been to do the opposite.

The Local Plan is 708 pages long and difficult to read and digest. It is technical and difficult to understand. The housing need and economic development need documents are 300 and 234 pages long respectively, and there are many other documents to review to fully understand the full extent and consequences of the proposals. The key calculations on the housing need are not included in the publicly available documents, and it is difficult to determine as how these have been calculated.

A summary document has been produced, but this fails to discuss the key points that could lead to meaningful challenge to the Plan. Presentation Boards have been developed for the consultation sessions and again they explain what will happen rather than why, the implications, or to ask for views on choices.



Overall, the consultation is presented as a “done deal”, and that any issues will be sorted out. The Plan documentation has not been designed to support transparency or meaningful consultation. This may or may not be intentional. As such, it is not clear that the community fully understands or supports the strategy or not.

2.12 CONCERNS FROM LOCAL ORGANISATIONS

The NHS responses to the plan show that most of the current NHS facilities are not capable of servicing the forecast population levels. The Highways Agency also has concerns regarding the additional traffic on the motorway network. There are plans to improve the junctions if funding is made available. Overall, several parties have concerns with regard to the ability of the local infrastructure and resources to service the proposed economic and housing developments. It has already been shown that the infrastructure costs are high to provide what is needed.

WBC plans to resolve some of these concerns, but many of these are dependent on securing funding and may not materialise or may be late in implementation. Even so, not all of these needs are being addressed. Overall, it is uncertain that the infrastructure and services required to support the Plan will actually materialise.

2.13 THE BUSINESS CASE FOR THE LOCAL PLAN IS WEAK

As with the business case for the New City, the Local Plan is also weak as a business case for investment. Again, few of the principles of the Green Book have been adopted. No options have been developed, there has been no cost benefit analysis, sensitivity studies, etc. It is not clear as to what the social objectives are. The public consultation has not been meaningful.

WBC'S LOCAL PLAN STRATEGY IS FLAWED

- The need to build significant housing stock and utilise the green belt is based on WBC's strategy for the New City, which is in itself seriously flawed
- The calculation of the need for 816 dpa is very questionable and is very likely to be too high and will lead to the unnecessary destruction of the green belt
- WBC's own numbers show that the 816 dpa target can be met by NOT developing the green belt especially with the use of the Fiddlers Ferry site and accounting for the green belt developments already approved by the Council
- WBC's economic forecast is questionable and shows significant uncertainty. The forecast looks to be optimistic, when compared to other recent and reputable forecasts
- There is significant uncertainty with the inherent economic and migration forecasts that are part of the target of 816 dpa. When compared to ONS and other meaningful forecasts, WBC's values look too high
- When aligned and put into the context of the surrounding Councils and regional Plans, Warrington's housing target is clearly too high. Therefore, there is no valid case for claiming exceptional circumstances to utilise the green belt
- WBC's coordination of planning strategy has been poor, with no evidence of an aligned strategy to deliver the Government's housing target
- Public consultation on the Local Plan has been poor and has not intended to solicit meaningful dialogue with residents and has not demonstrated support from the community
- It is uncertain if the infrastructure and additional community services will actually be provided to support the proposed developments, particularly if WBC is in significant debt

- The need for developing the green belt has not been adequately demonstrated. Therefore, the strategy should be to hold all green belt developments until such time as there is a clear need
- The premature release of green belt for development, without a realistic need is criminal destruction of a natural and valuable resources for future generations. Those responsible should be brought to account for their actions