



11th November, 2021

Please find my response to the Updated Proposed Submission Version Draft Local Plan.

1. Policy DEV 1 Housing Delivery - 14688 units (816 per year)

1.1 The number of homes proposed is not deliverable: in the first 5 years the number of units to be built annually is set at 678 dwellings; for the remaining 13 years it is set at 870 dwellings.

The number of houses Warrington has delivered over the last few years are as follows:

2017/18 359 (792); 2018/19 503(887); 2019/20 541(786) - the number in brackets is the required number.

1.2 In the 3 years where there has been a developer 'free for all' where development is less likely to be turned down because of not demonstrating a five year supply, Warrington failed to deliver the required number of units.

1.3 With Brexit and the pandemic resulting in even more labour and material shortages it is unrealistic to propose that 678 units a year will be possible when prior to all the issues the most that was built was 541. The figure of 870 a year for 13 years is even more unrealistic and there is no evidence at all to suggest this would be possible. This unrealistic figure of 14688 units must be challenged. Continuing with a housing figure of around 550, which is deliverable and equates with the housing figure which passed inspection in 2014, would remove the need for any loss of Green Belt (see 1.12). It is noted that beyond the plan period over 3000 units could be built on brownfield. Perhaps these are the units that have been land banked and not recorded in the brownfield register so that developers can use the Green Belt for more profitable development (see 1.6).

An undeliverable housing target makes the plan unsound.

1.4 It is also claimed that building 816 dwellings per annum will see an 11% increase in population between 2021 and 2038 (22300 people).

The figures from 2018 SNPP show growth is only 3%, lower than national levels. This is despite having a supply of 267 hectares of Economic land at Omega and Lingley Mere. Therefore the argument that increasing economic land increases the population does not stand. There has been a 'developer free for all' due to the failure to demonstrate a five year supply of land since 2015. Even with unrestrained housing development population growth is lower than national levels. The unrealistic population growth proposed by an undeliverable annual housing figure makes the plan unsound.

1.5 As the data used in the plan also uses census data from 2011 it would be more prudent to wait until the 2021 data is available, especially given the significant changes that have already had to be made in the space of two years.

1.6 Even more worrying is the fact that Warrington Council are not correctly maintaining the Brownfield Land Register. They have no record of how much land has been approved for housing, but not yet built - 'Part 2 identifies brownfield sites that have been granted planning permission- in- principle for residential development. We've not started work on Part 2 of this register at the current time.' This has been a requirement since 2017, so should have been completed.

Before allowing the release of even more land for housing, the required register must be completed to give a full picture of the housing situation.

1.7 There also needs to be a way of ensuring planning applications for housing which are approved after the housing assessment work was completed are counted towards the forward supply.

1.8 There is an annual need for 433 affordable homes each year over the plan, not large numbers of commuter dormitories which are more profitable for developers/ Homes England. The plan does not meet the needs of the community so it is unsound. Warrington has not come anywhere close to building 433 affordable units a year as instead the supply has been predominantly expensive commuter homes, with

developers claiming including affordable homes makes a development unviable. There is an unspent balance of S106 payments for affordable homes listed in the infrastructure budget.

1.9 There is a current application (2017/31394) for an 8 storey, 362 unit apartment block, which also has a 9 storey car park. Town centre living should not be promoting car use, more apartments could be built instead of a car park. The housing density proposed for the town centre is too low. If Warrington wants to be a city it should be aiming for greater housing density of 250 units per hectare not 130.

1.10 Warrington has an adopted plan from 2014 which lasts until 2027. The housing figures within that plan were challenged by the developer, Satnam. This left Warrington without an agreed housing target, which has been the situation since 2015.

1.12 During this period of ‘sustainable development’ Warrington has not been able to build above the original, challenged annual figure of around 570 units.

The requirements 2006-2012.	3000
Completions to 2012.	5075
Carried forward to 5 year supply	2075
Up to 2022 supply 0-5 years.	2765
Supply years 6-10.	1558
Total	6398
Up to 2027 supply years 11-15.	1562
Total.	7960 yearly average 569 units

1.13 There have been recent developments in which Michael Gove has stated that the housing figure algorithm is outdated and also Boris Johnson’s has claimed to want to defend the Greenbelt from housing.

1.14 Satnam have now won the appeal to build on Peel Hall meaning 1200 houses can be built immediately.

1.15 The current situation:

- The absence of Part 2 of the Brownfield Register which would inform how many houses have been given permission but not yet built.
- The proposed changes by central government to the housing algorithm and protection for the Greenbelt.
- The lack of infrastructure to support a larger housing target.
- The availability of a housing supply (1200) at Peel Hall
- The permissions given for housing since the cut off date for the plan which can be added to the forward supply : 300 at Omega on economic land, 250 proposed at Burtonwood together with the following applications since April 2020:

2021/38524	228 units phase 2 Grappenhall Heys
2020/37849	30 apartments WA1 3BE
2020/38271	14 units Penketh
2020/37959	39 apartments 122m2 commercial WA1 1E2
2020/37982	4 units Poplars
2020/37910	9 units Lymm Rushgreen Works
2020/36525	6 apartments WA1 3NX
2020/36311	31 units WA4 4BZ
2020/36579	69 units Affordable (Foxwood School) Council owned***
2020/36798	92 units Affordable (Sycamore School) Council owned ***

- The current Local Plan lasts until 2027, so a plan is already in place for the December 2023 deadline.
- The failure to build more than a maximum of 541 houses a year (only 359 houses in one of the assessed years)
- The pandemic and Brexit which are causing labour and materials shortages

In light of the above, the Council should be:

- vigorously challenging the imposed, impossible housing target
- updating as a matter of urgency Part 2 of the Brownfield Register
- using the number of houses given permission, but not yet built to show a forward supply of housing to be deducted from the target
- challenge the 40% uplift imposed for failing to meet an impossible target over the assessed period
- OR
- delay the plan until a new algorithm is produced
- continue to count any houses built in the interim period to offset the future target ie carry forward for future demand.

The policy is unsound; it does not meet the needs of the area as the infrastructure cannot cope with the proposals. It is not positively prepared. The evidence used to arrive at the housing figure is flawed and the figure is not deliverable. No Green Belt should be released for housing as this plan is provably unsound.

2. Policy DEV 4 Economic Growth and Development -316 hectares of land

2.1 Warrington's Economic Development Needs Assessment (EDNA) 2021 concludes there is insufficient employment land. This is only because it has used the unprecedented release of land for employment at Omega to skew the figures. This has resulted in the figure of 316.26 Ha over the plan period, 17.57 Ha annually . If the job growth method had been used the shortfall over the plan period is only 21-43Ha land. Taking Omega out of the economic land use 1996 to 2020 gives an annual take up of around 8Ha, less than half the figure being proposed.

2.2 Prior to this, an assessment of employment land was completed for the 2014 local plan. This showed the annual need was 11 Ha per year, an uplift of 20% was added to give the total requirement until 2027 (277 Ha). Again, the average figure was obviously affected by the take up of land at Omega, without which the average would have been around 9.5 Ha. Identified sites, completions, sites under construction and Omega phases 1 & 2 provided 268.36 Ha. Therefore only 8.64 Ha was needed until 2027. The remaining land at Omega, (105.86 Ha) provided an excess of 97.22 Ha - a forward supply of 8.8 years beyond 2027 to 2035.

2.3 It is totally unrealistic and not justified to use the unprecedented supply of land at Omega to predict future economic land requirement. The policy MD6 is unsound and there is no justification for releasing 136.92 Ha from the Greenbelt for the South East Warrington Employment Area(Six56) (SEWEA).

2.4 Furthermore, an internet search (www.really.co.uk) shows just how much vacant office and warehouse space already exists. Below is just a few examples from one real estate website.

Howley 80 78621 sq ft

Quay Business Centre 426-3056 sq ft

Genesis Centre 467-3604 sq ft

Phoenix House 3815-19288 sq ft

Ibis House 1422 sq ft

Units 15-31 Grosvenor Gran 5317sq ft

251-256 Europa Blvd 6376 sq ft

Units 8-16 Ridley Rd Galsworthy Court 18644 sq ft

Units 241-246 Europa Blvd 3741 sq ft

***Tungsten Park 244 000 sq ft

Renaissance House 6319-13186 sq ft

Unit 7 Eagle Park Dr 11650 sq ft

Units A&B Leacroft Road 10257-12526 sq ft
27-31 Sankey Street 9208 sq ft
Europa House 5684-8978 sq ft
***Units 1-8 Times Square 3496-4084 sq ft
***Omega Office 10000-50000sq ft
Units 1-4 Howley Lane 8800 - 45000 sq ft
Unit F New Hall Lane, Taylor Business Park 19022 sq ft
Unit B Cedar Court, Taylor Business Park 25443 sq ft
***K2 Birchwood Science Park North 23491-50549 sq ft
Units 10-15 Coalville Court Winwick Quay 11906-24301 sq ft
The Enza Building 32467 sq ft
Warehouse 2 Birchwood Lane 137100sq ft

2.5 A further search of one estate agent dealing in office space had 12 listings for small office space and 7 listings over 1000m². Two sites, Daresbury and Birchwood Park, each had vacant space in excess of 9000 m².

2.6 There is vacant warehouse space at Barleycastle, the former JTF store at Woolston, and empty retail units in Golden Square, Junction Nine Retail Park and Riverside Retail Park.

2.7 The empty employment sites need to be used for housing where possible, taking pressure off the Greenbelt. It is also far better, in terms of the carbon impact, to reuse buildings instead of building on green spaces.

The policy is unsound as it does not meet the needs of the area and the evidence used to justify the release of land for economic use is flawed.

3. Policy DEV5 Retail and Leisure Needs / Policy TC1 Town Centre

3.1 There are no specific plans to regenerate the town centre, which is in a dire situation. Golden Square has expensive parking fees and little to offer as many shops have closed. Outside Golden Square it is even worse and is a mix of bargain stores, betting shops and fast food outlets.

3.2 If a complete overhaul is needed this should be contained within the Local Plan so that the number of housing units that can be created by regeneration are also included.

3.3 With the tendency to knock down public houses and restaurants for even more housing eg The Springbrook, residents are being deprived of leisure facilities. Lymm used to have gym facilities, fast food outlets and dog training at Tanyard Farm. This has been knocked down for housing leaving Lymm with even more houses and even less facilities. The Lymm Hotel, which had historic and cultural value has also been knocked down for housing.

3.4 Lymm has no bank and you have to drive out to Agden, where there is very little parking, to get a full postal service as there is no longer a full service in Lymm.

3.5 Because of the greed of all those concerned in the planning process, Lymm has the population of a town and not even the facilities of village.

The policy does not meet the needs of the area, it is unsound.

4. Policy GB 1 - Green Belt.

4.1 As shown above in sections 1 and 2 there is no justification for removing land from the Green Belt. The evidence is flawed.

4.2 DEFRA ALC shows the land proposed for the South East Warrington Urban Extension (SEWUE), South East Warrington Economic Area and the residential Pool Lane site in Lymm to be Very Good agricultural land. It should not be taken out of the agricultural land supply and Green Belt - doing so does not comply with the declared Climate and Environmental Emergency.

4.3 Removing land from the Green Belt will have a devastating impact on the environment and will only serve to make the air quality even worse, particularly near the motorway AQMA.

The policy is unsound, it does not meet the needs of the area, the evidence used is flawed and an alternative was to use the predicted jobs supply needs which would have resulted in a need for only around 40 hectares of land - met by Fiddlers Ferry.

5 Policy INF1 Sustainable Travel and Transport

5.1 There is insufficient infrastructure to cope with the housing target. Various residential groups are making the claim that further development cannot go ahead in their area as they already know how overstretched the roads are. For example, one group want the housing in the SEWUE moved next to the A50 as the roads nearer to Grappenhall are at capacity- so is the A50 as it is the link road from the motorway interchange. The stretch of the M6 between Junctions 19 and 21 is an accident black spot, so the surrounding roads, including the A50, are frequently at a standstill. It would also mean houses being built nearer to the motorway Air Quality Management Area (AQMA). However no one wants more housing in their area due to the failure to provide and maintain sufficient infrastructure in the past.

5.2 The proposed traffic management at the Lymm interchange roundabouts need to be installed to cope with the current traffic situation.

5.3 The SEWEA would make the congestion at this roundabout even worse which will adversely affect Lymm Fire Station.

5.6 If the SEWEA goes ahead, it cannot be safely reached from Lymm, as Cherry Lane is unsafe for pedestrians and cyclists- there are no pavements and no street lights. Also it is too dangerous for pedestrians to cross the roads at the roundabouts.

The policy is undeliverable and does not meet the needs of the area - it is unsound.

6 Policy INF 3 Utilities, Telecommunications and Broadband

6.1 It is little comfort to know that new houses will get decent services when where I live I am guaranteed only 1MB/ sec broadband speed. We have to pay extra to get a 4G router on top of paying what some people pay for fibre for our broadband speed. The very low speed makes working from home near to impossible. Warrington should be sorting out services for existing residents instead of building even more houses.

6.2 Instead of building more houses, ensure the ones already built will not flood.

The policy does not meet the needs of the area - it is unsound.

7 Policy INF 4 Community Facilities

7.1 There is no detail for the provision of medical facilities

7.2 The hospital cannot cope with the current population. There is nowhere to park as it is predominantly staff parking and there is no bus service from Lymm.

7.3 Again, the promise of a new hospital is little comfort when the current population do not have an accessible service.

The policy does not meet the needs of the area- it is unsound.

8 Policy IN5 Delivering Infrastructure

The data showing how future infrastructure will be funded is full of gaps, which is probably why the roads are currently so bad as development has been planned without securing funding for the necessary infrastructure.

In particular, creating the SEWUE residential area and the sites in Lymm will create even more car dependent residents. The mass transit system is no more than a 'pipe dream', but would be needed to allow the residents at the SEWUE to reduce car dependency.

The policy does not meet the needs of the area and is not deliverable- it is unsound.

9. Policy DC1 Warrington's Places

9.1 Current planning policy is destroying the character of Warrington's suburbs.

In particular, allowing housing that looks like it is from a 'zombie apocalypse' - Homes England's Urban Splash development - is not in keeping with the desire to create places where people want to live.

9.2 It is also not justified to say that new development will not have an impact on health and air quality, as air quality studies are based on unpredictable assumptions of electrification and use of sustainable travel in the future. There is no date for electrification of HGVs and without a mass transit system and a greatly improved and cheaper bus service, car use will continue to dominate.

Car use is higher in Warrington than the national figure.

9.3 The examples of culture for Warrington show how poorly the area is supplied, and was starkly apparent in the current city status bid.

The policy does not meet the needs of the area or look at alternative evidence- it is unsound.

10 Policy DC3 and DC4 Green Infrastructure/Ecological Network

10.1 The infrastructure budget shows money has not been spent on some the ecological mitigation requirements of previous planning applications, demonstrating a lack of commitment to green infrastructure.

10.2 No action is taken when developers breach ecological mitigation or remove trees shown as retained on planning - for example Lymm Truckwash.

10.3 Criminal proceedings should be imposed on any developer falsifying environmental reports or breaching environmental mitigation and this must be written into policy in such a way as it is not open to interpretation. This would be in line with the declaration of a Climate and Environmental Emergency.

10.4 Developers try to impose 'variation of conditions' agreements so they do not have to make the promised S106 payments. It must be written into policy that this is no longer tolerated.

The policy does not meet the needs of the area, it does not provide enough protection for the environment as it is worded in such a way as to be open to interpretation so developers can pay lip service to the content. Mitigation and net gain need to be defined and fines imposed for developers who fail to meet the requirements. It is unsound.

11 Policy DC6 Quality of place

11.1 This is covered in section 9.

11.2 Massive housing estates with generic housing do nothing to enhance the character.

Policy MD2 is unsound; big housing developments also remove amenity for existing residents contravening ENV8, **it does not meet the needs of the area.**

12 Policy ENV 8 Environmental and Amenity Protection

12.1 It is claimed that new development will not have an unacceptable negative impact on air quality and will not further exacerbate air quality in the Council's designated Air Quality Management Areas (AQMAs). Building the SEWEA just off the M6/M56 interchange at Lymm is in direct contravention of this policy. There are houses less than 90 m from the dumbbell roundabouts where the traffic will leave the motorway, further increasing levels of air and noise pollution for residents. Policy MD6 is unsound and it does not comply with ENV8.

The case outlined above shows that the plan does not meet the needs of the area- it is unsound.

13 Policies MD2,MD5,MD6,OS1,OS2,OS4,OS5,OS6

If it is somehow decided that Green Belt needs to be released it must not be built on until all brownfield options are used. Before any Green Belt is released Part 2 of the Brownfield Register must be completed.

The above policies are unsound as there is no justification for release of Green Belt land. The evidence used to try to justify the housing numbers and amount of economic land is seriously flawed. The policies do not meet the needs of the area.

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