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12<sup>th</sup> November 2021

RE: Warrington Local Plan

To Whom it may concern,

Please find below my comments on the aforementioned;

The concept changes in the latest version of the Warrington Local Plan are relatively small and many of the arguments against the original PDO version of 2017 stand. I have therefore attached my original submission which is still valid even though there has been a small decrease in Housing numbers and sites like 'Fiddler's Ferry being brought forward. The basic premise/concept of the plan remains Unsound and Undeliverable.

In addition, I would like to add the following;

### **Volume of Housing**

Warrington's Local Plan ('the Plan') is based upon a premise of huge growth. This growth derived from local trade bodies (eg 'Warrington & Co' and the Local Enterprise Partnership) who have vested financial interests in over inflating such predictions. In addition, despite the government guidance setting a 15 year plan period (it can be less), the plan is projected for the next 18 years. The figures used in respect of housing numbers are from the housing requirements given by the ONS in 2014. This is despite ONS publishing revised and much lower figures in 2016 and beyond. In each case the housing forecasts have been revised downwards ... and this was prior to Covid and Brexit which have both had further negative effects on the housing requirements. Whilst previously the government has advised that the 2014 figures are the current baseline it has also advised that the **housing need is NOT a target**, more of a starting point. Why have Warrington Borough Council chosen to use the maximum figures they can to calculate the housing need and why an 18 year plan? In the current climate, surely lower timescales can and should be considered whilst the country, as a whole, settles from turbulence the like of which has not been witness since WWII. Either way, using an 18 year target for the plan is not justifiable and renders it unsustainable.

More recently, noises from government ministers and especially Michael Gove, make it clear that the Housing Numbers are hopelessly outdated and will most likely be revised downward. It could therefore be argued that the plan is being brought forward prematurely and, indeed, many councils have stalled their plans whilst they await further guidance from central Government. I urge Warrington Borough Council (WBC) to follow a similar more considered route.

If WBC were to take pragmatic approach with reduced plan length and more regular reviews, WBC could easily reduce the pressure on Greenbelt release. Since the previous incarnation of the plan (PSV), only 18 months ago, a huge brownfield site has emerged at the former Fiddler's Ferry Power Station site. This demonstrates that brownfield sites come available all the time, and certainly many will emerge in 18 years so why set a Greenbelt target at the start of the plan when careful management would mean it is not required at all?

As WBC have not taken such an approach, it would appear that they have a different motive and it could be argued that they are being 'developer led', especially as the majority of the land is owned by Central Government (Home Office). This view is further supported by the plan calling for ALL the greenbelt to be released immediately the plan is adopted. This is not a 'brownbelt first' policy and goes directly against NPPF, government and political guidelines and of course public opinion.

In terms of housing supply, WBC has a housing delivery record of circa 350 houses PA, with a peak of approx. 550PA. This is for a number of reasons but it is not one of land supply. Developers will only build houses that they know they can sell for the maximum profit. Hence, developers will only want to build in the areas and at a rate of their choosing. In effect they will land bank as it is in their interest to do so. During the Plan period the housing supply varies but peaks well over twice the current record. It cannot be sustainable that WBC could control the building of houses at TWO or THREE times their previous average and peak build rates. It is also not sustainable to expect that developers will build the number of houses or in locations as dictated by WBC as this will not be profitable.

In short, WBC's projected growth, plan period and build projections are unjustified, UNSOUND and UNDELIVERABLE.

Why have WBC not put more emphasis on town centre development? It is clear that the town centre is dying. Retail has been hit hard over recent years and this is very evident if you visit Warrington. Yet for some reason WBC seem hell bent on building needless warehouse type shops along the A49. Instead a more rational approach would be to redevelop the town centre with a mixture of retail AND residential to ensure the footfall and of course this is here the two train stations are enabling commuter links to the neighbouring cities. By building housing out of town they move more people away from the town centre, strangling it in terms of people wanting to visit and clogging it with traffic. This is even more the case in Warrington where these outlying settlements (both proposed and existing) have a **total reliance on the car** and very little other infrastructure in place or viable in the Plan.

### Infrastructure & Air Quality

The proposed developments on the South of Warrington are huge in scale and will change the character of the settlements beyond all recognition. Many of the infrastructure issues have been present for decades and what is installed is already at, or over, capacity. For such developments to be approved it would require significant initial investment to develop the right kind of infrastructure to service the area. Without this the Plan is undeliverable. The Plan and the Local Transport Plan (LPT4) should give detail on how this will be designed, funded and implemented. Unfortunately this detail is missing from both documents and what remains is a wish-list of ideas from which it is impossible to determine the viability of any proposed development. Trying to gain further information on both the Plan (and LPT4) is difficult. Officers could only answer with 'it's only a concept', 'purely illustrative' or 'we will be firming that up over the next five years'. It is totally unacceptable that WBC would instigate a plan without a clear and robust framework for the proposed development. It is also not acceptable to deliver such a framework years after the Plan has been implemented when it is clear that infrastructure is required in advance of development.

A typical example of the 'wish list' is the idea of a Mass transit system for the south of the town. The idea is floated in LPT4 and added as a 'future proposal' with an indicative route in the Plan. It is circa 2km long, ends at Stockton Lane and does not go over the waterways – presumably because of cost and complexity - it would mean knocking down existing housing to gain access to the Cantilever Bridge and the town centre beyond. Therefore, it does not solve any transportation issue and is totally unfunded.

The proposed employment development areas in the South form part of the plan yet the developers are already applying for planning permission for these areas (eg Stobarts and Six:56). It is clear from their plans they are not willing or able to fund any significant infrastructure improvements for the estimated additional 24000 vehicle movements per day. Add that to 23k cars from the Plan's proposed 15k houses, gridlock and yet further deterioration in air pollution are the obvious outcomes. As LPT4 offers nothing more than a wish-list of ideas and therefore is UNDELIVERABLE, it seems that the policy of the plan can only be based around use of the motor vehicle. This is not sustainable for a town with already the **WORST pollution in the country**, where the local MP and Parish Councils have called a 'climate emergency' and for a country aiming for zero net carbon emissions by 2050. Putting more vehicles on overcrowded roads and removing much of Warrington's 'Green Lung' does not sit well with the aims of the area, the country or the accord being struck at COP26.

### **Greenbelt Release**

By releasing Greenbelt at the start of the plan, WBC and the people of Warrington will lose total control of development within the area. I assume that WBC consider this a good idea as they may get 'section 106' money earlier, allowing WBC to retrospectively install infrastructure. This is a VERY risky strategy. As mentioned earlier, developers will control what gives them maximum profit and deliberately hold back monies until the last moment. WBC, as do all local authorities, have a very poor record of recovering moneys as developers have a very good record of not delivering as expected. The experience of WBC at Chapelford gives us a recent example of poor infrastructure delivery and developer delays. It should also be pointed out that retrospectively installing infrastructure would put incredible and unjust strain on the whole of Warrington's roads, motorways, doctors, schools etc and blight communities.

As mentioned in Stockton Lane's submission for the PDO. There are serious doubts about the quality of the greenbelt assessment completed by ARUP which was still relied upon for the PSV and this latest Plan. Although updated in 2017, the report appears to have been written with an end result in mind in an attempt to weaken the greenbelt's case. The issues with the report are, (a) The status and accountability of the report (b) The insensitivity of the Arup methodology (c) Inconsistent results within the Arup reports (d) An incomplete process of greenbelt assessment. I urge WBC to read again the attached report and conduct a much more thorough and accurate assessment.

### **In Summary;**

The plan is based upon unrealistic projections of future growth and therefore is **UNSOUND and UNDELIVERABLE**.

NPPF and government policy on the Greenbelt is not being followed and therefore is **UNSOUND and UNDELIVERABLE**.

The number of houses proposed is without precedent and WBC will not be able to manage developers or developments of such scale and therefore is **UNSOUND and UNDELIVERABLE**.

The infrastructure required for developments of this scale is not included, costed or funded and therefore is **UNSOUND and UNDELIVERABLE**.

The greenbelt assessment used to support the Plan is **UNSOUND**.

The already crippling Air Pollution will be exacerbated by the plan and therefore is **UNSOUND and UNDELIVERABLE**.

Yours Faithfully,

Chris Gould

(address above)