

## Warrington (PSV) Plan 2021 Response

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In my view the Warrington Town Plan PSV 2021 (PSV 2021) is not sound, and is largely a rework of the 2019 Plan albeit now recognising the potential of the Fiddlers Ferry site. It has not adequately addressed some of the issues that myself and others have raised under the consultation exercise related to the 2019 Plan document. There is inadequate justification for the growth targets for house building and for economic development. The proposed sites for both new housing and for new economic growth are oversized and unsuitable given the lack of infrastructure. In particular the supporting Transport Plan is lacking in detail and does not ensure that adequate infrastructure for traffic is put in place alongside the proposed house building.

I consider that the PSV 2021 is unrealistic and over-ambitious in terms of its growth assumptions, undeliverable when compared to recent historical levels of house building achievements, proposes excessive release of Greenbelt release without justifying 'exceptional circumstances' for either additional housing or economic development, and is lacking in consideration of key issues such as Climate Change, town centre regeneration and Warrington's existing high levels of air pollution.

### 1. Comparison Between PSV 2021 and 2019 Plan

1.1 I was one of those who submitted responses to the 2019 Plan and although WBC claims to have taken account of all of these responses it is my opinion that the PSV 2021 fails to address adequately many of the shortcomings or weaknesses previously set out in responses and appear still to be evident. One of the biggest flaws in the 2019 Plan was its commitment to release a very large area of Greenbelt mainly in South Warrington and all at the beginning of the Plan period. There was no provision for phased release of Greenbelt land during the period up to 2038 and no concept of protected land which could only be available for building on once certain criteria were met (whether triggered by infrastructure delivery or perhaps future scheduled review points).

1.2 In my view it is clear that if WBC's 2019 Plan had been approved as originally set out it would have resulted in the excessive release of Greenbelt far greater than could have been justified in later years as UK Government guidance inevitably undergoes further changes. The PSV 2021 has indeed proposed that significantly less Greenbelt is required for release than was the case for the 2019 Plan, Whilst the reduction may seem something to be celebrated by those keen to preserve Greenbelt, the scale of the difference is alarming and does not raise confidence in the methodology to calculate Greenbelt release and raises serious questions concerning an approach which recommends releasing all Greenbelt requirements in one go. And once Greenbelt is released it is gone for ever.

1.3 Given the latest situation that so many of the models, assumptions and forecasts in WBC's 2019 Plan have turned out to be wrong and have been amended or have been removed completely in the subsequent PSV 2021 issued only 2 years later, it is valid to ask what confidence can now be placed in the assumptions in the 2021 Plan? The implications of Brexit are still developing and being understood and with mitigations so difficult to plan (for example Warrington IBF was hurriedly built and opened in January 2021 with a capacity more than 10 times its actual usage in the first 9 months of 2021), and also the ongoing impacts of Covid 19 on the economy, on lifestyles, on shopping habits, on office working and home working and commuting to work are still being assessed by both Government and by individual families. It is therefore equally valid to ask how much confidence can be placed on existing planning policies and assumptions in the PSV 2021 and whether current trends are being recognised. For example there are many office blocks in Warrington town centre which, if people do not return to full-time office working, may become

empty and redundant, and similarly car show rooms within town centres may be judged to be inappropriately located compared to future usage of such sites. These sites may quickly become new Brown field opportunities for new town centre housing.

## 2. Commentary On The PSV 2021

2.1 Warrington is constrained by three waterway barriers affecting transport north to south and surrounded in close proximity by 3 motorways. These constraints majorly impact on traffic route choices for residents and result in undesirable concentrations at key times with consequential adverse impacts on air pollution in areas which funnel traffic towards the bridges which cross the waterways on routes through Stockton Heath and Latchford.

2.2 These constraints are very significant when assessing the viability of any future development for transport routes, for additional housing and the location of new economic development areas. It is my understanding that when Warrington was expanded (as a New Town) in the 1970s, which coincided with the previous major release of Greenbelt land, the Inquiry into the Outline Plan which took place in 1972 received statements from the Highways Authority (Cheshire County Council) that further additional house build south of the Ship canal should be limited to no more than 1000 houses unless an additional north-south transport route (over the waterways) was built. Indeed the plans showed the indicative path for this transport route from Junction 10 of the M56 at Stretton to bypass Warrington town centre and eventually to join the M62.

2.3 In the event the limit of 1000 extra houses south of the Ship Canal was achieved by the early 1980s and further housing developments have been approved (including the David Wilson and Barrats developments currently under construction at Blackcap/Dipping Brook yet there has been no progress on constructing a new north-south transport route. It is therefore difficult to understand the logic of a plan which would result in building a further 4200 houses in South Warrington without committing to the construction of a new north-south transport route. I am not convinced that the potential Western Bypass would significantly address this issue as related to the routes through Stockton Heath and Latchford.

2.4 In light of the above it is my view that the PSV 2021 and in particular the proposed South East Warrington Urban Extension (SEWUE) does not meet the test of soundness as set out in the National Policy Planning Policy Framework (NPPF) 2021. In particular the SEWUE does not meet the requirements of paragraphs 35(b) and 35(d) in that the PSV 2021 SEWUE current plan does not amount to an appropriate strategy, does not meaningfully take account of reasonable alternatives and is not based on proportionate evidence. I justify these assertions in more detail in the paragraphs below.

2.5 The area of land included in the SEWUE is adjacent to or incorporates substantial areas of ancient woodland. In particular the Lumb Brook Valley (which includes the Dingle and Fords Rough) is recognised ancient woodland and is managed by the Woodland Trust. Grappenhall Heys also contains key woodland at Parrs Wood and Beech Wood managed by the Woodland Trust. It should be noted that UK Government advice to local planning authorities is that ‘You should refuse planning permission if developments will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless:

- i) there are wholly exceptional reasons;
- ii) there is a suitable compensation strategy in place’.

2.6 Ancient woodlands are unique habitats established over hundreds of years and as such are ‘irreplaceable’. Any plan which proposes mass development adjacent to ancient woodland or

surrounding ancient woodland must be seen as a retrograde step. Attention should be paid to the views of the Woodland Trust on the PSV 2021.

2.7 The Woodland Trust has addressed the issue of housing developments adjacent to ancient woodland or its supporting habitat and has recommended ensuring that a buffer zone of at least 50m is put in place. Furthermore recent amendments to the Environment Bill considered and passed by the House of Lords has included recommendations of a minimum 50m buffer zone.

2.8 Reviewing the proposals for the SEWUE it is clear that the planned housing developments impact severely on the Lumb Brook Valley ancient woodland. The proposed housing would block in the existing ancient woodland on all sides and cut it off from the remaining supporting habitat. In general the potential impact on ancient woodland is not addressed in the PSV 2021. It is particularly surprising that the Mersey Valley Timberland Trail, which is a walking route from Runcorn to Lymm passing through ancient woodland in South Warrington is not mentioned at all in the PSV 2021.

2.9 The calculation of housing need in the PSV 2021 remains based on 2014 data. There have been significant impacts on the UK population growth and on the UK economy since 2014 not least because of the impact of Brexit and Covid 19. It is surely time to update the 2014 data or at least recognise the growing uncertainty attached to it. The annual house build target of 945/year proposed in the 2019 Plan has been reduced to 816/year in the PSV 2021 (a reduction of 14%) but is still without adequate explanation of how the revised lower figure is accurate for Warrington. In particular the amendments made to these models in 2020 and used by WBC in preparing the PSV 2021 cannot yet have taken account of the impact of Brexit on the level of immigration and UK population forecasts or the impacts of Covid on the economy and also the convenience of regular travel between UK and Europe. Both the short and longer term impact of these factors is likely to be negative on population growth and demand for housing.

2.10 The PSV 2021 includes calculations of the additional housing requirements but contains no reality checks on either the demand or supply sides of the equation. It fails to identify where the demand for the houses will come from (where are the people relocating from and why to Warrington) and also how such numbers can realistically be delivered. Firstly, the forecast of economic growth is vaguely justified and seems to be driven by new housing creating economic growth rather than the other way round (as would normally be expected). Secondly, house building at 816/year is well in excess of the rates that have been achieved in the 5 year period 2013-2018 prior to Brexit and Covid 19 impacts. There is little evidence that the resources available locally in the UK can support these levels of house building in the next 5 years.

2.11 The 2014 data will surely be updated in the near future as the impacts of Brexit and Covid 19 become progressively apparent. It would therefore surely make good sense to incorporate review points into the PSV 2021 and most importantly to consider possible mechanisms for setting limits on the short term release of Greenbelt rather than releasing it all at once (for example by setting a low limit of release for the first 5 years of the PSV 2021 period).

2.12 The PSV2021 makes certain assumptions about usage of Brown field land and then calculates the amount of Greenbelt which it considers to be required to meet the requirement for further house building. Surprisingly and with little justification the PSV 2021 includes a proposal to uplift the requirement for Greenbelt by an additional 5% to address WBC's expectation of potential 'slow progress' by developers in delivering houses on the plots of land they purchase. Such an allowance was not included by WBC in the 2019 Plan and is both an unjustifiable accommodation towards developers but also gives an impression of 'putting the cart before the horse'. Developers can be expected to be commercially driven and led by customer demand. If there is not sufficient overall

demand resulting in below target house build then there can be no justification for releasing yet more Greenbelt land at the initial stage in order to encourage certain developers to 'cherry pick' the most desirable plots within the excess of Greenbelt released. Again once Greenbelt is released it is gone forever and there can be little doubt that the extra 5% allowance will also be built on (thereby effectively reinstating the 5% uplift (in housing numbers) which WBC included in the 2019 Plan and has removed in response to adverse public comments).

2.13 It is my view that Greenbelt should be protected as far as practical. This principle is embodied at a national level in the NPPF. There should therefore be clear priorities put in place in any town plan to use brown field land first before building on Greenbelt. WBC should have strong policies and controls in place in order to promote and incentivise the prioritisation of brown field sites and optimising the number and types of homes built on Brown field land.

2.14 The above three points all justify an approach under which the release of Greenbelt is controlled by the Council with the interests of the residents in mind rather than led by developer aspirations and short term profits. In particular it implies that WBC should adopt an approach related to the PSV 2021 stretching out to 2038 which sets out a phased release of Greenbelt land with carefully scheduled review points and further consultations with residents to ensure that all current and future factors are taken into account.

2.15 in my view there are factors of great significance to residents in Warrington which appear to have received minimal attention by WBC in the PSV2021. Air pollution and the Climate Change emergency have achieved greater scientific recognition and consensus over the past few years and have also gained greater public attention with demand for planning to take these issues into account with clearly set out policies aimed at not making the situation worse.

2.16 In particular Warrington is one of the worst towns in England for air pollution levels, especially PM2.5. Some of the reasons for these current statistics are understandable because of the concentration of traffic flows at peak times due to the constraints imposed by the waterways and motorways. It is important the PSV 2021 addresses these problems in a positive way and whilst it cannot alter the major constraints it can seek to avoid making the problems worse. In practice this could mean planning new housing such that the demand for car transport is minimised, the ability to service by public transport is maximised and HGV traffic is kept well away from the existing and new housing. I am therefore opposed to the building a dual carriageway from Junction 10 on the M56 to Junction 20 on the M6 at Lymm which travels through existing and new housing in the SEWUE without appropriate weight restrictions as it could provide a thoroughfare for HGVs.

2.17 Climate Change is now recognised as a world wide threat and is therefore clearly an important issue to be considered in both plans and policies. New policies are emerging (electric cars and their supporting charging infrastructure, phasing out gas boilers and introducing heat pumps, new standards of insulation, new initiatives for building energy efficient houses etc.) as well as new threats (e.g. flooding and environmental pollution whether air pollution or plastics in the environment). The full implications have yet to be understood but flexibility related the potential impact of Climate Change needs to be built into the PSV 2021. Some UK Councils are already taking important steps. For example Suffolk County Council has recently announced that it will commit to spend £12.8m into reducing the carbon emissions at more than 130 of its buildings. There are other examples of local plans committing to minimise the amount of concrete being laid, the amount of cement being used in buildings and prioritisation being given to approaches such as promoting timber frame dwellings and/or low energy buildings.

2.18 The proposal for the Economic Development Area located close to M56/M6 junction does not appear to be based on carefully studied demand for economic activity of various types (i.e. a bottom

up analysis) but is rather based on simple projections from history (i.e. a top down calculation of demand) which are unsurprisingly distorted by the very large developments at the Omega Site in North Warrington over recent years. In my view WBC is being unrealistic in its forecasts.

2.19 WBC appear to be assuming that the Economic Development Area aspirations can be achieved almost exclusively by Warehousing and Distribution activities. However this seems commercially driven rather than reflecting a strategic approach by WBC with an emphasis on creating job opportunities for local residents. Creating yet another Warehouse and Distribution centre close to a motorway is likely to be a retrograde step. New warehouses are likely to involve high levels of automation and continued innovation will mean that warehouse jobs can expect to be relatively easily replaced by further automation. It is unlikely to be a source of sustainable future employment and it will not future-proof Warrington's economy. It is therefore difficult to see how such a proposal to create an Economic Development Area on Greenbelt land could possibly satisfy the criteria of 'exceptional circumstances'. Rather I would suggest that WBC should be looking into emerging technologies and exploring the opportunity for a science park or technology park in the corridor between Manchester and Liverpool.

2.20 The PSV 2021 should demonstrate an intention to achieve a high level of integration between economic growth areas and nearby housing developments. Additional housing and new economic activity areas should be mutually supportive. This does not appear to be the case between the current SEWUE proposals and the proposal to release Greenbelt land for this specific Economic Development Area. The cost of new housing in the SEWUE is unlikely to be affordable for warehouse and distribution jobs holders. A further observation is that distribution centres are best placed close to railways and therefore Fiddler's Ferry is likely to be a better location.

2.21 The PSV 2021 is supported by a Transport Plan document. The current Transport Plan document lacks detail and there is no clarity on the means of funding or delivery. It appears to be more of a wish list than a credible plan hand in hand with the PSV 2021. As it currently stands the infrastructure delivery plan is dependent on roads which are already overstretched. There is no confidence that the infrastructure needed to support an additional 4200 houses can or will be delivered in the main settlements of South Warrington.

### 3. Summary

In summary it is my view that the PSV is not sound because:

- there is inadequate justification for the levels of predicted growth
- there is no justification for the scale of release of Greenbelt land and no mechanism for minimising Greenbelt release as the plan progresses over a 17 year period
- there is inadequate justification for focusing economic growth on warehousing and distribution
- there is considerable uncertainty regarding the calculation of the required number of new houses
- there is inadequate consideration given to avoiding making worse the levels of air pollution
- there is inadequate consideration of the means of addressing issues related to Climate Change
- there is no clarity on the means of delivery
- there is no explanation of how the current transport routes will cope with the increased traffic
- there is no need to commit to the SEWUE which will threaten the landscape and character of the villages in South Warrington.

Yours Sincerely

Heather Fensom

