

Warrington (PSV) Plan 2021 Response

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In my view the Warrington Town Plan PSV 2021 (PSV 2021) is not sound, contains only limited changes from the 2019 Plan and only some of those changes can be considered to be significant improvements or reflect meaningful alterations to strategy.

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, unsupported by detailed plans for infrastructure improvements clearly necessary, proposes excessive release of Greenbelt release without justifying 'exceptional circumstances' for either additional housing or economic development, and is lacking in focus on 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

I was one of over 3,500 people 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. The table below summarises the main points I made in respect of the 2019 Plan and highlights where the issues and again relevant to the PSV 2021.

	2019 Plan Issue	PSV 2021 Situation
1	The economic growth forecasts appear to be over ambitious and without adequate justification. There is not a strategy to attract the right type of jobs to improve the economic 'health' of Warrington. Rather the economic growth strategy appears to rely too heavily on large numbers of low grade warehouse jobs (which are subject to automation).	No change to types of industry, types of jobs or level of economic growth ambition and still without a strategy.
2	Location of economic development is predominantly on a single site on Greenbelt land adjacent to junction of M6 and M56 without justification of 'exceptional circumstances'. It fails to demonstrate that priority has been given to utilisation of Brownfield land over Greenbelt land.	No change to size or location of this major site for economic development
3	The economic growth assumptions to 2038 appear to be driven by the forecasts of additional house building between 2017 and 2038 rather than the other way round.	No change other than start date of house building in Plan moved to 2021.
4	The house building targets were based on Govt. model using data from 2014 which resulted in target of 909 houses per year but backdated to a start date of 2017, so already some 1500 houses shortfall by time Plan approved (in 2020).	More up to date Govt. model has been used which generates lower target of 816 per year. Start date revised to 2021.
5	WBC increased annual target from 909 per year to 945 per year (5%) reflecting assumption that Warrington would grow at faster rate than Govt. model required but without justification of such additional 5% uplift over such a long period of time.	This 5% uplift has been removed. However WBC have adopted a different approach of proposing additional 5% Greenbelt release.
6	There was inadequate focus on regeneration of Warrington	Significant changes in this area

	town centre and use of existing and potential future brownfield sites.	with use of brown field sites and greater intensification of homes in town centre.
7	Fiddlers Ferry site not included despite impending closure.	Fiddlers Ferry included – with both housing and economic development options.
8	The proposed new ‘Garden Suburb’ to be located in South East Warrington was an outdated concept relying on high levels of car usage to access Warrington town centre and centres of employment for highly skilled workers.	Garden Suburb concept has been removed but replaced by South East Warrington Urban Extension of 2400 houses (increasing to 4200).
9	There was a proposal to release all forecast ‘requirements’ for Greenbelt land at the beginning of the Plan period and without any options for phased release despite uncertainties in validity of modelling.	No change to approach although revised model results in reduced release of Greenbelt land for housing.
10	There is no mention of additional north to south transport route to accommodate increased number of cars from the large number of homes to be built in the South of Warrington. The suggested Western Link appears to be driven by Port Warrington concept rather than to ease housing traffic issues. The Transport Plan is too conceptual and therefore not costed or funded and not integrated with the PSV.	No change.
11	Plan does not address need for a new hospital in Warrington during Plan period.	No change.
12	Plan fails to address existing high levels of air pollution in Warrington and how to minimise adding to the problem. Nor does it address the issue of Climate change as an integral component of the Plan (especially in respect of house building guidelines/requirements) despite UK Govt. ‘Net-Zero’ carbon targets by 2030 and 2050.	No change.

It is evident from the above high level comparison that a number of key concerns raised with the soundness of the 2019 Plan were valid and WBC have made beneficial improvements whilst others have not been adequately addressed in the PSV 2021 and therefore need to be revisited as I set out below. In particular, the approach in the previous 2019 Plan of having a 21 year plan with a retrospective start date of 2017 has been recognised as unacceptable, the use of UK Govt. models/assumptions which resulted in a target of 909 homes per year has been accepted as incorrect, the unjustified WBC decision to add a further 5% to the average annual housing target has been removed, the out dated Garden Suburb concept has been replaced and the availability of the Fiddler’s Ferry site has been recognised. These changes in response to public comments have not only reduced the total housing targets to 2038 by several thousand homes but have also increased the prioritised use of brownfield sites and significantly reduced the requirement to release Greenbelt for house building.

The clear conclusion is 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 Govt. guidance changed. And once Greenbelt is released it is gone for ever.

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? And with the implications of Brexit still developing and being understood (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 the ongoing impacts of Covid on the economy, on lifestyles, on shopping habits, on office working and home working and commuting to work still being assessed by both Government and by individual families, it is equally valid to ask how much confidence can be placed on existing planning policies and assumptions. For example Warrington town centre office blocks may become empty and redundant, and 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 'Gray' field opportunities for new town centre housing.

2. Commentary On The PSV 2021

2.1 Whilst it might be incorrect to claim that Warrington is unique, it is certainly true that Warrington is constrained in unique ways 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 at pinch points such as the 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. In particular it is worth noting that when Warrington was expanded (as a New Town) in the 1970s, which was the last time there was a release of Significant Greenbelt land, the Inquiry held in 1972 into the Outline Plan received statements by 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 to south to transport route (over the waterways) was built. Indeed the plans showed the outline plan for this transport route from Junction 10 of the M56 at Stretton to bypass Warrington town centre and join the M62.

2.3 The limit of 1000 additional houses had been reached by 1980, and construction of a few thousand more houses has continued and yet there has been no progress on constructing a new north-south transport route. It is therefore difficult to understand the logic of building a further 4200 houses without committing to the construction of a new transport route.

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. 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.

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 Parr's Wood and Beech Wood managed by the Woodland Trust. All of these woodlands already have housing developments directly alongside one side of them. Attention must be paid to the views expressed by the Woodland Trust regarding the PSV 2021. 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. The idea that it is good practice to plan housing development directly adjacent to ancient woodlands is an outdated concept that may have been acceptable in the 1980s, but it is now the 21st century with a recognised climate emergency and much more awareness of environmental impacts. 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 regressive step.

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. Previous housing developments approved by WBC in the 1980s (e.g. Dudlows Green) did not implement such buffer zones and such practices must be prevented in future.

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 supporting documents to the PSV 2021 make it clear that WBC considered 4 separate options for the SEWUE. It decided that Option 2 was preferable over the other three options because it offered good access to local green space, because the consequential increase in traffic would involve less additional congestion on existing local roads, required less new road building and because it could effectively link into existing local services. In my view this assessment is incorrect and potentially biased towards developer interests and the fact that most of the land incorporated by Option 2 is owned by a single entity Homes England. The WBC assessment claims that Option 4 is more isolated. And could have a greater negative impact upon landscape character compared to Options 1 and 2. I could not disagree more with these poorly justified arguments in favour of Option 2 or the weak criticisms of Option 4. I consider that Option 2 should not be allowed to latch onto already overburdened services in Stockton Heath and is in danger of creating an urban sprawl.

2.10 I would like to submit that Option 4, which is located on land adjacent to the A50 into Warrington from the south east should be preferred as it is the one which best protects the existing character, minimises the impact on local villages, requires the least Greenbelt release and is a better location for access nearby existing services in Grappenhall whilst minimising the need for car journeys. I would urge that Option 4 is re-examined in line with the responses received during this consultation exercise.

2.11 The calculation of housing need remains based on 2014 data. This data will surely be updated in the near future. 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 approximately 14%) without adequate explanation of how the revised lower figure is accurate for Warrington. The UK Govt. models used in the calculations of housing requirements have been updated compared to those used in the 2019

Plan but must still be subject to further adjustments almost certainly downwards as a result of the economic downturn in 2019 and 2020. In particular the amendments made to these models in 2020 cannot yet have taken account of the impact of Brexit (with non British residents from Europe leaving England) or the impacts of Covid on the economy and also affecting the convenience of what had, until recently, been unrestricted 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.

2.12 By whatever models the theoretical housing requirement numbers are generated there is a surprising lack of explanation of exactly where the demand for the houses will come from (where are the people relocating from and why to Warrington?) and also how such numbers of additional houses 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 impacts. There is little evidence that the resources available locally in the UK can support these planned levels of house building in the next 5 years.

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

2.14 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 potential 'slow progress' of developers in delivering houses on the plots of land they purchase. This 'Developers Allowance' was not included by WBC in the 2019 Plan and is both unjustifiable and gives an impression of 'putting the cart before the horse'. Developers will be commercially driven and customer demand led. If there is not sufficient overall demand then there can be no justification for releasing yet more Greenbelt land in order to encourage certain developers to 'cherry pick' the most desirable plots within the excess of Greenbelt released.

2.15 Greenbelt should be protected as far as practical. There should therefore be clear priorities incorporated in the PSV 2021 to use brown field land first before building on Greenbelt. Similarly priorities should be put in place to achieve town centre regeneration ahead of 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. Furthermore 'Grey' field sites should be identified and encourage to relocate to out of town locations in order to free up these grey field sites for house building. These and other focused approaches could ensure that the release of Greenbelt land is carefully controlled and kept to a minimum.

2.16 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 calls for WBC to 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.

2.17 As at today there are already important such factors of great significance to residents in Warrington which appear to have received minimal attention by WBC. 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. Air pollution is very local whilst Climate Change is global but these are both very relevant for a Town Plan covering the next 17 years.

2.18 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. This means not 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 which would provide a thoroughfare for HGVs.

2.19 Climate Change is clearly an important issue. WBC declared a Climate and Ecological Emergency in 2019 and issued a Green Strategy document in the same year. The strategy appears to be focussed on commercial businesses (e.g. solar panels on large commercial warehouses and buildings) and few if any objectives relate specifically to house construction or the impact of new house building on the surrounding environment. In the past two years issues have become more critical and mitigation thinking is moving rapidly. New UK level policies are emerging (electric cars and their supporting charging infrastructure, phasing out gas boilers and introducing heat pumps, new standards of insulation, energy efficient houses etc.) as well as new threats (flooding and plastic waste). The full implications have yet to be understood but flexibility directly related to house building needs to be built into the PSV 2021.

2.20 The Local Government Association (LGA) has stated that Local Councils are key to achieving the UK Governments targets related to Climate Change because they are closest to the concerns and views of local residents. Local Councils are expected to lead on the necessary key changes and not to continue with the 'status quo'. Some 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.

2.21 The proposal for the Economic Development Area located close to the junction of the M56 and M6 does not appear to be based on carefully studied demand for economic activity of various types but is rather based on simple projections from history which are unsurprisingly distorted by the developments at the Omega Site in North Warrington over recent years. In my view WBC is being unrealistic in its forecasts. Growth predictions are based on levels of activity which have never been achieved in South Warrington before.

2.22 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 the Council and 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 are 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 WBC should be looking into emerging technologies and exploring the opportunity for a science or technology park in the corridor between Manchester and Liverpool.

2.23 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 will not 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.

3. Warrington Transport Plan

3.1 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 either in the main settlements or in outlying ones such as Lymm.

3.2 The PSV 2021 housing requirement delivery strategy places a major emphasis upon creating the SEWUE residential settlements in South Warrington and south of the three waterways. In contrast the Transport Plan recognises that the current preponderance of workplaces such as Lingley Mere, Omega, the Town centre, Gemini/Winwick retail parks, Woolston Grange and the Birchwood Science Park are all north of the three waterways. This is a clear mismatch which will very likely result in a high proportion of the employed members of households in the SEWUE creating a large increase in peak traffic through the pinch points leading to the bridges over the waterways.

3.3 The Economic Development area proposed close to the junction of the M56 and M6 is likely to create similar problems. In their initial planning application for this site Langtree have proposed a new 'Six/56' development of warehousing and distribution facilities which they claim will generate over 4000 jobs and their outline plans show the provision of 2400 car parking spaces. The associated increased traffic flows will impact adversely on the already overloaded local highway network.

3.4 There is a further constraint not previously referred to. Peel Ports has ownership of all the swing bridges and the Cantilever Bridge within the Warrington network system. Peel Ports has full control over the operation and maintenance of these bridges. The failure of any of these bridges has the potential to gridlock traffic to and from South Warrington. There has been a long running campaign by local residents to have Peel Ports refurbish and paint the bridge at Stockton Heath. Peel Ports has adopted a stance that it would need to close the bridge for at least 6 weeks to undertake this work in the most effective (i.e. lowest cost to them) manner. This is a good example of the potential problem with relying on bridges not under Council control. The Transport Plan needs to include a commitment to build a new transport route over the waterways which is under the Council's control and integrated with the rest of the traffic network.

4. 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 no clear requirement for regeneration of the town centre and use of Brown field sites before Greenbelt is consumed in a manner very largely determined by developer cherry picking
- 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
- the impacts of Brexit and Covid 19 on the economy and housing requirements have not been taken into account nor the uncertainty they present recognised
- 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 in association with new house build
- there is no clarity on the means of delivery of the necessary infrastructure
- there is no explanation of how the current transport routes will cope with the increased traffic
- there is no need to commit to the the scale of the SEWUE (2400 homes rising to 4200 homes) which will threaten the landscape and character of the villages in South Warrington
- WBC has identified 4 distinct options for the SEWUE and chosen to prefer Option 2 over the other three options whereas I consider that it can be argued that Option 4 is the least damaging option for the villages of South Warrington and offers several other advantages

Thank you for giving attention to my submission.

Yours Sincerely
Steve Fensom

