Warrington (PSV) Plan 2021 Response

Submission By Dr Indi Tranter

I feel that the Warrington Town Plan PSV 2021 (PSV 2021) is not sound, contains few amendments from the 2019 Plan and few of those changes can be considered to be significant improvements or show meaningful alterations to strategy.

I believe 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 these responses I believe 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.

It is clear that if WBC's 2019 Plan had been approved as originally set out it would have resulted in the release of Greenbelt far greater than could have been justified in later years as Govt guidance inevitably undergoes further changes; 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 there are many office blocks in Warrington town centre which 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 Brown field opportunities for new town centre housing.

2. Commentary On The PSV 202:

a. Clearly several thousand houses have been built south of the Ship Canal since the early 1980s and yet there has been no progress on constructing a new north to south transport route. It is therefore difficult to understand the logic of a plan which would result in building a further 4200 houses without committing to the construction of a new transport route.

b. Whilst it might be incorrect to claim that Warrington is unique, it is certainly true that Warrington is constrained uniquely by three waterway barriers affecting transport north to

south and surrounded by 3 motorways. These constraints majorly impact on traffic route choices for residents and result in high level of air pollution at pinch points such as the routes through Stockton Heath and Latchford.

c. 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 quantities of Greenbelt land, the long term planning guidance stated 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. The plans showed the indicate path for this transport route from Junction 10 of the M56 at Stretton to bypass Warrington town centre and join the M62.

d. 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.

e. 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) and Grappenhall Heys are recognised areas of ancient woodland. 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.

f. 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.

g. 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 50mis 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.

h. In reviewing the proposals for the SEWUE 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 though ancient woodland in South Warrington is not mentioned at all in the PSV 2021.

i. The calculation of housing need in the PSV 2021 remains based on 2014 data. 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.

j. By whatever models the 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 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. When average house building was below 500'year. There is little evidence that the resources available locally in the UK can support these levels of house building in the next 5 years.

k. 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.

l. The 2014 data will surely be updated soon as the impacts of Brexit and Covid 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 for the first 5 years of the PSV 2021 period).

m. 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 achieving the 5% uplift WBC chose to include in the 2019 Plan and came under pressure to remove by public comments).

n. It is UK government guidance that Greenbelt should be protected as far as practical. And this has been reinforced by recent public comments by the Prime Minister. There should therefore be clear priorities put in place 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.

o. 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.

p. 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.

q. Climate Change is clearly an important issue. 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 needs to be built into the PSV 2021. 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.

r. 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.

s. 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. 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’. The PSV 2021 should demonstrate an intention to achieve a high level of integration between economic growth areas and nearby housing developments. 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.

t. 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. 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

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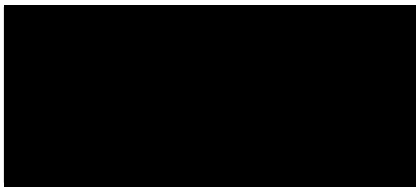

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