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13 November 2021

Local Plan  
Planning Policy and Programmes  
Growth Directorate  
Warrington Borough Council  
East Annexe  
Town Hall  
Sankey Street  
Warrington WA1 1HU

**Re: Warrington Local Plan 2021 to 2038**

Dear Warrington Borough Council,

I am writing to object to the Warrington Local Plan which I believe to be neither sound nor deliverable. Details of my objection are as follows:

**Revision in numbers**

The revised Local Plan includes a reduction in the number of new homes from 945 per year over a twenty-year period to 816 over 18 years. This not only seems arbitrary, but when factoring in the 10% “flexibility uplift” and including those developments recently completed, currently under construction, or with plans already agreed, any real reduction is questionable.

**Need for new homes**

Simply building more homes will not solve the housing crisis. The real issue is one of affordability rather than shortage, with many homes being financially out of reach of home seekers in terms of both property prices and private rental prices – which are currently uncontrolled.

Furthermore, across the country many houses lie empty for long periods of time, particularly in the private rental sector. According to the Government's own figures, England has in excess of 500,000 empty homes. In Warrington alone there are some 1000+ empty residential properties, of which more than 800 have been empty for six months or longer.

Whilst simply releasing these properties for occupation will not solve the local housing crisis, the eighteen-year plan to build an additional 15,000 (*approx.*) new homes is questionable both in terms of need and sustainability. Based on Warrington’s population statistics, and the UK’s as a whole, the Local Plan appears to use an arbitrary forecast for the number of new properties actually needed, with no evidence of

consideration to an ageing population – those residents most likely to be seeking smaller homes, assisted living, or social care, rather than 3-, 4- and 5- bedroom executive homes.

**It is important that we learn lessons from the past and the Local Plan should include a clause that allows for reducing the number of homes needed, changing the types of homes needed, or repurposing land should requirements change during the Plan period.**

If the growth of Warrington's population is in part due to population shifting from one area to another, for example an influx of people from neighbouring cities such as Liverpool, then it is important to address why people are moving. We are not a lone disparate nation here in Warrington, but an integral part of the North-West region, and as such our Local Plan should take account of those of our neighbouring regions, rather than serve to compete.

**The goal to "level-up" the UK, if it can be achieved, can only succeed if "joined-up Government" is in operation, otherwise there are serious questions over ethics, feasibility and sustainability. There appears to be no evidence of this in the Local Plan.**

### **Affordability of housing**

While the number of new homes actually needed is questionable, there is undoubtedly a need for "affordable" housing as well as for smaller homes for first time buyers, older people looking to downsize, and single or newly separated/divorced home seekers. Yet, despite their initial pledges, it is all too common for developers to find reasons for revising their plans partway through a building project, resulting in fewer smaller affordable homes and greater provision of larger expensive ones.

Examples of this are the recent housing developments at Saviours Place in Stretton consisting of 3-, 4-, and 5- bedroom executive homes with a starting price of £259,995, and Orchard Meadows in Appleton where prices start at £355,000. With the average price of a Warrington home being £230,125 (Land Registry November 2021), these new homes are already beyond the reach of the average homebuyer.

A sound development strategy should factor in any potential risk factors governing a developer's failure to deliver agreed quotas of affordable homes. It should also ensure that any retrospective adverse viability assessment that would result in a developer's failure to meet the original housing requirement is released for public scrutiny.

In addition, it is vital that the Local Plan ensures that all new homes meet both national minimum space and build quality requirements so that developers are unable to exploit planning loopholes – a situation currently affecting a nearby northwest region.

**Warrington Borough Council should make every effort to restrict developers to adhere to agreed plans to build those homes actually needed rather than those that serve to maximise profits, while ensuring that all national standards for new build are met.**

### **Planning laws**

This issue of availability of affordable homes is further exacerbated by lax planning laws which allow for over-extension of homes as a more affordable option to moving. This is already having a far-reaching impact by changing the local environment, pricing future home seekers out of their family communities, and creating a need to build yet more small affordable homes in the future.

Similarly, the availability of bungalows favoured by older members of the community has been impacted by the current trend of adding a second floor, thus reducing the number of one-storey properties, increasing prices and, again, resulting in a need to build more one-storey properties in the future to replace those that have been lost.

**The Local Plan needs to factor in stricter planning laws to escape a perpetual vicious cycle of build, extend, build to replace ... build, extend, build to replace ...**

### **Roads, congestion and transport**

We already suffer intolerable road congestion in the area. Existing access routes are not fit for purpose and congestion is set to get worse, with the recently completed housing developments already resulting in increased traffic flow. Adding to the burden is an increase in private hire vehicles and large commercial logistics vehicles. We need real and workable solutions to these problems now.

Furthermore, increased road traffic will cause even more damage to local roads, many of which are already in a poor state. Warrington Borough Council already struggles to meet demands for repairing damaged sections of road and the extra traffic will put even more pressure on local authority budgets.

It is extremely disappointing to see that by 2041 the aim is to reduce car travel by just 14% from 2011 levels. The number of additional cars on the road resulting from 15,000 additional homes by 2038 will render Warrington's roads completely unusable unless there is a drastic overhaul of the public transport system – one which provides a realistic and viable incentive for residents to abandon their cars for most local trips.

Evidence of road widening and building of new roads across the North-West and the country as a whole does little to convince any of us of a national commitment to a future with less car usage.

The Warrington Transport Plan includes some good ideas, but it is still little more than a vague concept, failing to give specific details on precisely how and when local travel improvements will be achieved. When will there be more bus routes and stops? How many and where? When will the Manchester Metro link extend to Warrington? How can this be achieved – is the land already earmarked? Exactly how will Warrington connect with neighbouring villages, towns and cities in a way that residents can even begin to consider a car-free existence? How can local transport be made truly affordable?

**Warrington Borough Council needs to resolve current transport and highways issues and agree a clear and detailed Transport Plan before new homes are built.**

Retrospective works will cause mayhem for the new larger community and increase the overall project costs, especially considering the likelihood of repeated excavation for utilities that should be synchronised with construction.

Furthermore, new public transport services cannot be planned once building has started as the necessary land needed for new initiatives, such as extension of the Metro Link into Warrington, will be gone forever.

### **Green transport initiatives**

We live in an area, and at a time, where consideration for our environment is more important than ever, yet the development proposals do little to deter use of cars. The new electric buses are certainly a positive step forward in terms of our region's environmental effort, but this green initiative does not, in itself, deter the use of cars.

By way of example, the large residential area along Longwood Road Appleton was built almost 40 years ago, yet still some residents have to walk for ten minutes to the nearest bus stop to travel into Warrington centre. This may seem trivial, but for those needing to commute daily for work, and at regular times, trying to juggle journey times and frequencies can be a real issue. Often driving is the only practical alternative.

Whilst the inclusion of a plan for new cycling and walking routes is also laudable, it does not provide any real incentive for people to resist the temptation of driving. Furthermore, for many people it is simply not practicable to travel on a daily basis by bicycle or on foot. For those who work outside the local area, for those who need to carry briefcases and other work materials, for those who need to wear a suit and arrive at work looking presentable, bicycle travel is not an option.

It would be interesting to know what proportion of Warrington Borough Council employees currently cycle to work or have plans to abandon their cars based on the current Transport Plan – particularly given the British climate.

A desire by residents to “go green” is not sufficient when the means to achieve this are lacking. A recent journey between Warrington and Northwich took in excess of two hours using public transport. This is completely unacceptable, especially as it is possible to reach London in a shorter time! It really is no wonder that people feel there is no alternative to driving.

**Warrington needs a complete revamp of its existing road transport infrastructure, with a focus on both greener public transport and on improving connections throughout the town and with other villages, towns and cities in the region, as a viable and affordable alternative to car travel.**

Warrington is unique in its location between Liverpool, Chester and Manchester, but it falls short in terms of connectivity and transport infrastructure. This is a detriment to businesses considering a move to the area and a will deter commercial use of the town centre and job creation.

### **Pollution and the environment**

The road infrastructure in South Warrington, including Stockton Heath, adjacent villages and connections to central Warrington, is poor and deteriorating. There is motor traffic congestion throughout the working day, but this is particularly bad during rush hours and school-run times. Attempts to alleviate congestion, for example, the construction of the Centre Park Link, have simply created new bottlenecks around the town centre.

The proposed new housing and industrial zones will lead to increased pollution through increased emissions, risking higher mortality and an increasing spectrum of illnesses now known to be caused by the ingestion of even low levels of toxic materials. This will be particularly dangerous to children and vulnerable residents and will be seen as a direct and measurable correlation to increased traffic congestion on Warrington’s already gridlocked roads.

In the Centre for Cities pollution survey 2020, Warrington is shown to have some of the highest CO2 emission rates per capita, and in the matter of toxic NO and particulate production (PM2.5) Warrington has the highest emissions per 10,000 inhabitants. These figures exceed those found in the major cities of Liverpool, Manchester and London, which is extremely disturbing.

COP 26 includes a key principle of decarbonizing and reducing atmospheric pollution, which the Local Plan fails to support; thus, it is not delivering on the commitment made by the UK Government.

The building of new homes and the introduction of new vehicles into the area can only worsen Warrington’s toxic gas figures and there is a growing belief that in the future mass action, such as that already taken by the organisation ClientEarth, may be taken against councils that do nothing to abate the problem – particularly when it is within their control.

**There is an opportunity here within the Local Plan for Warrington to become a leader in re-planning infrastructure with a deliberate emphasis on the reduction of vehicle traffic and motor generated pollution.**

### **Employment opportunities**

Employment opportunities created by both the housing and the industrial developments will be aimed predominantly at low wage workers. The new homes will not be affordable to most of them as the affordability calculation takes no account of real local wages. Consequently, the majority of workers will be forced to travel from outside regions. This will offer no contribution to the local economy and will further increase the burden of traffic on our roads, in particular, increasing the throughput of heavy vehicles. In addition, during the building phase many of the jobs will be temporary, with workers laid off once building has finished. Moreover, the industrial zone strongly aligned to warehousing and logistics is a prime candidate for automation, with the inevitable resultant decline in numbers of human employees.

### **Greenbelt**

The loss of our Green Belt is irreversible. Warrington Borough Council's proposal to build on Green Belt land is wholly unacceptable and is not a viable solution to the housing crisis.

In 2016, Sajid Javid, Secretary of State for Communities and Local Government, stated in Parliament that the Green Belt is "*absolutely sacrosanct*".

Green Belt is there to benefit us all. The need for open green spaces is extremely important in helping us dealing with the daily stresses of modern life, providing us with recreational and educational opportunities, walking routes, nature trails and fresh clean air to breathe. Without Green Belt, we will all suffer from a lower quality of life and an impoverished environment.

Much Green Belt land is agricultural or has agricultural potential and provides a vital economic resource for food security and soil protection. We should be looking at ways to improve the livelihoods of farmers instead of allowing the closure of farms in the interest of expanding urban sprawl, which is the biggest threat to climate change. It is understandable that any farmer would accept a sale price of ten times the value of their land from a developer who knows they can get planning permission because of an arbitrary, poorly researched Government directive.

Land use and urban design on brownfield sites are regarded as sustainable when land use functions match regional socio-economic demands and needs. The integration of the reuse of brownfield sites into a regional land management and into the urban development are seen as sustainability objectives as well.

Even before Covid-19, there was an overprovision of office accommodation in Warrington. Now, even more office buildings are under-utilised or lie empty. Redevelopment of these sites to provide residential accommodation or a mix of residential and business should be given serious consideration.

**Warrington Borough Council's priority should be to source suitable brownfield sites and focus on community-led schemes of genuinely affordable housing, including a higher provision of social housing.**

### **Flora, fauna and biodiversity**

The Green Belt within the Warrington area is home to a huge variety of local wildlife, including rare and protected species. These green spaces provide local habitats and corridors for the safe movement of our wildlife.

Whilst the Local Plan gives some consideration to biodiversity, the proposals to build on Green Belt will ultimately result in wiping out many species, not only destroying local biodiversity but decimating species which are vital to food production. We are already feeling the impact of dwindling numbers of bees and insects through destruction of flora.

Large numbers of species are being forced into extinction because of our continual destruction of their habitats. For us there is always an option – we can find alternative solutions for dealing with the current housing “crisis”; for them there are no alternatives when their habitats are destroyed.

Whilst the Local Plan highlights “designated sites of nature conservation value” in and around Warrington, wildlife does not simply exist in the areas we choose to designate as wildlife habitats out of a misplaced and naive sense of morality. Every small piece of woodland, every field, tree, hedgerow, pond, is home to multiple species and it is our duty to consider and respect and protect them.

**The following quotes are pertinent to not only the Local Plan but to the future of all of us:**

*The Natural History Museum has recently stated that: “Centuries of farming, building and industry have made the UK one of the most nature-depleted countries in Europe. Extensive road networks, in combination with other factors, have reduced the wildlife in the UK to a point hardly seen elsewhere. While the UK has made some gains, natural landscapes have been so heavily degraded over decades and centuries that we are simply not doing enough to turn back the tide.”*

*Further research shows that: “The world’s overall biodiversity intactness is estimated at 75%, which is significantly lower than the 90% average considered to be a safe limit for ensuring the planet does not tip into an ecological recession that could result in widespread starvation. On this scale, the UK’s index reading was 53%. Not surprisingly this has left dozens of species hovering on the brink of extinction.”*

*In March 2021, The New Scientist reported: “Urban planners down the ages have taken inspiration from nature. And those of us living in the concrete and brick jungle have perhaps never appreciated scraps of green space more than during the Covid-19 pandemic. During lockdowns, city dwellers across the world have found parks and gardens – where they exist - an unexpected source of calm. That comes as no surprise to the growing number of psychologists and ecologists studying the effects of nature on people’s mental health and well-being. The links they are uncovering are complex, and not yet fully understood. But even as the pandemic has highlighted them, it has also exposed that, in an increasingly urbanised world, our access to nature is dwindling – and often the most socio-economically deprived people face the biggest barriers. Amid talk about building back better, there is an obvious win-win-win here. Understand how to green the world’s urban spaces the right way and it can boost human well-being; help redress social inequality and be a boon for the biodiversity we all depend on.”*

**Warrington has a unique opportunity to become a leader in this area in following the principles of COP 15 Convention on Biological Diversity that deals with the fair and equitable sharing of benefits from the use of nature.**

### **Flooding and water pollution**

Not only does Green Belt act as a carbon sink and protect our water supply by filtering nitrate from the soil, but it also provides drainage space for water to prevent flooding,

Building on green spaces with impermeable surfaces exacerbates surface water flooding. Properly managed green spaces can act as critical flood management systems by providing space for managed flooding, protecting built up areas.

Moreover, the recent creation of an Inland Border facility in South Warrington adjacent to the M56/M6 motorway and the increased area committed to logistics and warehousing development will further exacerbate the problem of water drainage and runoff, highway rubbish dumping, and the congestion and pollution of the urban road system. It goes without saying that these increased industrial facilities will in

turn lead to more accidents and as well as potential harm to residents in nearby conurbations due to toxic pollution.

As climate change brings an increased risk of flooding, Green Belt is now more important than ever.

The directives of a transient Government, particularly one that has made a U-turn on its vow for protecting Green Belt, are not sufficient reason for destroying our open spaces, cruelly destroying wildlife habitats and increasing the risk of creating housing zones so prone to flooding that they may one day no longer be habitable.

### **In Summary**

The Local Plan is a real opportunity for Warrington to lead the way in forward thinking and innovation, rather than just blindly following generalised arbitrary directives.

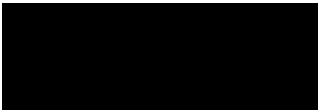
In the United Kingdom we are one people, but each hamlet, village, town, city and region has its own individual needs and we need to find a way of standing up and meeting these needs whilst continuing to consider and support the wider community.

Not only do we have a duty to our residents, but we carry a heavy responsibility for the survival of our society, our planet and every other creature that depends on it and us for survival, and in a way that creates the best quality of life for all.

Warrington needs a strategic plan that truly guarantees the viability of its landscape, the needs of its residents, and the welfare and safety of all future inhabitants of this Historic Borough.

I don't believe that the current Local Plan delivers on these objectives.

Yours sincerely,

A solid black rectangular box used to redact the signature of Tanya Henry-Dormer.

Tanya Henry-Dormer