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PART A - About You Advice (https://www.warrington.gov.uk/consultation-guidance) on completing this representation form. 1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number. Name of person completing the form: Peter Lewenz Email address: 2. What type of respondent are you? Please select one option only. If you are an agent please select the type of client you are representing. A local resident who lives in Warrington A group or organisation A person who works in Warrington Visitor to Warrington Local Borough, Town or Parish Councillor A Developer / Landowner Local Business owner/Manager Other (please specify): 3. Please provide your contact details: Contact details Organisation name (if applicable) Agent name (if applicable) Address 1 Address 2 Postal Town Postcode Telephone number

Local Plan, Planning Policy and Programmes Warrington Borough Council East Annexe Town Hall Sankey Street WA 1 1HU



11th Nov 2021

Dear Sirs

Response to the Warrington Local Plan

This is a response to the overall plan but, since I am an Appleton resident, it applies particularly to the developments in the South/South East of Warrington.

This plan is clearly focused on the housing needs assessment for the Borough, driven by the criteria set out in the National Planning Guidance.

National planning policy changed between the last Draft Local Plan and this current one, particularly with respect to the assessed housing needs which has now been reduced. Planning policy is likely to continue to evolve. The most recent change has been a re focus on the north of England and an emphasis on the priority development of brownfield sites as opposed to Green Belt.

Given this flux, it is important that to be sound, the plan should reflect the real and local needs of Warrington rather than the changing broad brush perspective of the national plans which may be unduly influenced by political expediency.

The national and local policy agendas are changing rapidly. The implications of the Cop 26 conference will not be clear for some time, but the demands for carbon neutrality and protection of nature will become increasingly important priorities. The Local Development Plan needs to better reflect this even if that is simply to be more circumspect about the projection of plans into the future.

Housing need

- The plan identifies a housing need to be met by new builds of 816/year over the planned period (slightly fewer in the first 5 years). Is this realistic? The plan states that the new housing build last year was 541, much less than this, and the number historically has not matched anything like this figure. Are the timescales robust?
- The planning document comments that to meet need 433 of the 816 build target should be affordable homes, which is more than 50%. And yet the requirement for affordable housing in new development areas is 20% for town centre sites and 30% for sites away from the centre. Clearly there is a mismatch between the estimated need and the development plans.
- Furthermore, despite the assertion that standards for affordable housing must be maintained, the suggestion is that affordable housing should sustain a 40% discount on normal market value. It is very hard to understand how housing developers will be able to achieve these kinds of discounts on up to 30% of affordable homes without an external source of funding. There will inevitably be an impact on general house prices which will in effect subsidise the affordable stock. Of critical importance will be that the quality standards of all new housing should be high, particularly with regard to energy conservation.
- The need for affordable housing for rent or purchase is evidently high. Is there a case in the development plan to additionally consider appropriate renewal of existing housing stock

- across Warrington to make it better fit for need? There is little consideration in the plan for this and it may be better value for money, even if it does not meet the new build targets set by the Government.
- Given the agreement in the national plans for brownfield development to be considered as
 priority before any plans for Green belt, it would be appropriate for the brownfield sites to
 be developed first. There is very little in the plan on the timescales or order of development
 by location.

Transport Infrastructure

- As stated in the plan on numerous occasions, Warrington has become wedded to the private car as a means of transport. This has implications for congestion, air pollution, parking needs, physical activity and numerous others. Encouragement and facilitation of walking and cycling are clearly desirable and are prominent in the Local Development Plan. Removing vehicles from our thoroughfares will make walking and cycling more attractive. To make this a reality requires a major development of public transport, particularly buses and especially if they are zero carbon. To wean the public off private vehicles and on to buses will need a significant upgrade in the service and for this to be sustainable over a long period and supported by vigorous promotion of the services. The development plan currently lacks a strategy to do this, including the likelihood that it will initially at least require very significant subsidy.
- The suggestion of a mass transport system to support travel from South Warrington is very
 attractive but will be regarded as a pipe dream without more detail. It needs to be built-in to
 the planning process at an early stage not at the end of the process which it is at present.
 Such a plan might reduce the need for parking facilities or the capacity of new road
 development potentially freeing land for homes.
- There is mention of rail services in the plan only in respect of HS2 and the Northern Rail link, both of which are regional developments. The plan should have some reference to further development of rail links for local commuter services. Although there is limited scope for this with the existing rail lines, new rail routes such as those above might offer some options.
- The canals, particularly the Manchester Ship Canal/River Mersey have long created a significant barrier between the north and south of Warrington. This has created an imbalance of development and services. The original New Towns development plans included strategic transport routes to address access between the north and south of the Borough and greater intergration of the town. This Local Development Plan fails to effectively address the transport structure to do this and is unsound for that reason. This plan offers a unique opportunity to address the fragmented nature of Warrington.
- Road links from the proposed 4200 new dwellings in the S E Urban extension will primarily
 provide access to the M56 via the A49 intersection (for car access out of Warrington) or
 access to the A49 through Stockton Heath and the canal bridge for those who wish to access
 sites in Warrington.

Schools, Retail and Medical Facilities

- The Development Plan for the South East Urban extension has limited detail of the concepts or timescales for the development of schools, local centres and hubs.
- There is a large, secondary school in the Appleton area, Bridgewater High, which is currently expanding its intake to address the needs of the 3 current new housing developments in the area. This school is housed on a split site and has buildings which

would benefit considerably from renovation. The plan proposes a new secondary school in the area. There would need to be early discussion of how the new provision would interface with the existing school and the implications for post 16 education in the area

Employment/industrial area

- The proposed area of industrial development between the M6 and M56 would take up a large section of Green Belt. Understandably, its location next to the motorway network will be very attractive to developers for the logistics industry. This type of industry, which is typified by the businesses in the current Appleton Thorne business park, employs relatively few people on site, many of whom have relatively low skills. These sites, given the type of activity are not generally visually attractive and will do little for the impression of Warrington as an attractive place to live and work.
- Businesses eg Tesco are now looking to shift their supply services from road to rail. There is
 little reflection of this in the Development Plan. Given the likely improvements in rail
 infrastructure in the vicinity of Warrington, there should be further consideration of the
 potential role of rail freight services, perhaps considering the development of land adjacent
 to Bank Quay station for a rail freight distribution centre.

Use of productive agricultural land

The Green Belt land in the proposals for the S E Urban Extension and adjacent land for
industrial development is currently high quality agricultural land, suitable for arable crops.
The loss of this land will be irreversible once development has taken place and it should take
place only as a last resort. The phasing of the developments in these plans is important, with
brownfield use taking chronological precedence over Green Belt starts.

Peter Lewenz 11.11.2021