

Proposed Submission Version Local Plan

PART A - About You

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: Stephen Kelham

Email address: [REDACTED]

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

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	-
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	-
Postal Town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

None of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant		X
Sound		X
Compliant with the Duty to Co-operate		X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Please see attached document

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Please see attached document

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Warrington Borough Council Local Plan Oct 2021 Version 2.doc - [REDACTED]

Comments/file description

Document with consultation issues addressed

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**

Warrington Borough Council Local Plan Consultation October 2021

I attended the consultation event recently, and had discussions with members of the consultation team who were very helpful. I have a number of specific concerns which I feel should be addressed regarding the proposals, primarily related to deliverability and the use of green belt land.

Notwithstanding these concerns, I understand that there is a necessity for a plan. Not having an up to date adopted plan is potentially worse than having what in my eyes, is a bad plan, but that does not mean that a bad plan should be accepted because it is better than nothing.

In comparison with the earlier versions of the plan, the current proposals do seem to be more realistic and take account of more recent developments regarding the availability of brownfield sites and consequentially a reduced demand for the destruction of the Green Belt. However priority seems to be given to this operation - probably because it is an easy hit, rather than a full evaluation of the alternatives. The NPPF guidelines para 140 states that Green Belt boundaries should only be altered when exceptional circumstances are evidenced fully and justified through the preparation or updating of plans. Although the bar is relatively low for “exceptional circumstances” the arguments against the proposed Green Belt developments are not adequately presented, and brownfield sites could be more widely used.

It is also disappointing to see that significant development of Green Belt sites has already taken place since the previous plans were withdrawn., without an agreed plan in place, and no recourse to overall planning policy.

There is a very high level of uncertainty around the likelihood of the involved parties being able to carry out the detailed actions proposed on the timescales given. The onus of carrying out the actions is with builders, contractors and organisations over whom the council has little or no control, and given the inevitability of curtailed budgets, and more onerous development criteria, it would seem the target timescales are over ambitious. The council record of delivery on previous promises is appalling, and this plan gives little credibility to the idea that things could be improved.

Some of the key unanswered questions which need to be resolved before adoption of any plan should be:

1 Ship Canal and transport links

What is the future of the Manchester Ship Canal in terms of boat traffic levels?. Any increase in shipping and movement of swing bridges creates traffic chaos, particularly if coincidental with issues on the M62/M6/M56 road network. The stated strategy should be to establish non interruptible traffic flows north/south across the Borough., The plan objectives can only be achieved by ensuring that the Western Link Road proposal is confirmed and that the new/replacement high level bridge to the east of the Centre is actually commissioned instead of merely being reserved land, as it has been for the last 35 years. Nothing in the plan suggests that there is any priority or even a chance of success in getting approval and funding for these activities

2 Infrastructure developments

The current planning appeals around the Peel Hall site continue, and the issues disputed are those which will delay and disrupt all the development proposals for green field, and to a lesser extent, brownfield sites across the Borough. If the developer wins the appeal, the site will be developed largely without regard to the criteria that the Council are endeavouring to impose on all the new development areas. If it loses, then the Council will require resubmissions for development planning permission, requiring the development criteria to be met, but these have been claimed to be non-viable by the current developer. It seems inevitable that the development criteria will have to be diluted. Other proposals will follow similar paths and infrastructure will suffer, and although the Plan proposals state that developers must provide adequate infrastructure investments to support the industry and housing objectives before major building starts and not afterwards, it is difficult to see how this will happen in practice to the levels required.

3 Housing Completions

The record of housing completions in the Borough has not been good over the last 10 years, and completion criteria have not been met, with between 50 and 75% of the target achieved. While there are inevitable peaks and troughs, there is nothing in the Plan that suggests that the situation will improve, and the Plan is at the mercy of the developers and their own agendas for progress. While it is suggested that the Plan will be reviewed every five years and targets may have to be adjusted, serious shortfalls would appear inevitable, and central government requirements are unlikely to be met. This could lead to developers applying for, and having to be given planning permission for developments which are deemed “reasonable” but are not part of the current proposals or priorities. It seems very likely that the planned SE Urban Extension, and other similar proposals could fall apart, through developers cherry picking lucrative activities and ignoring or circumventing the social and infrastructure issues.

4 Affordable Housing

The Plan seems to highlight the need for continuing consultations with developers, to define details and this is going to be essential given my previous comments. Some of these details such as the provision of affordable housing and disability provision are very important. In a high cost development, affordability is always going to be an issue, and a 20-30% discount on an expensive development still does not lead to affordability, without major reductions in standards. A level of realism is required which is not apparent in the proposals, and “affordable housing” should not be distinguishable from the “unaffordable housing” of the immediate surroundings. How is this to be achieved in practice?

5 Demographics

Demographics are available now for the population predictions for Warrington in 2038, and have no doubt been used in the preparation of this plan. Birth rates are falling so fewer primary schools will be needed, and not in the current areas, where the population will be ageing. People don't want to move out of their lifetime homes

unless absolutely necessary, so larger homes will end up with fewer occupants, while the younger generations will be seeking larger homes as families grow, which they can neither find nor afford. Statistical information in the Plan supposedly shows the changing demographics and household distributions, but does nothing to indicate how the whole housing population of the Borough needs to change over the planning period, and how these needs are to be accommodated. For instance, it would be easy to end up with an ageing retired population in relatively large houses adjacent to shops, schools and industry while the younger generation are having to travel to these locations from more affordable areas a long way away.

6 Transport Communications

Transport is a major issue which was addressed in previous plans, but to a lesser extent in this one. These issues are now becoming increasingly relevant. Little is said about the public transport infrastructures, and while it would be expected that criteria would have to be met, it will be at a possible significant cost to residents. Links to the town centre and central shopping areas are like spokes of a wheel, and while they get better the closer to the centre you are, cross spoke travel is virtually impossible without personal transportation. Restricted or non-availability of cars use will be unacceptable to most, so parking and good road networks must be maintained. Local centres may provide for basic needs, but being trapped within these would provide a poor quality of life. If car sharing or other options can be developed effectively some of these problems might be mitigated but to rely on unproven approaches will be ill advised in the early parts of a 15 year forward plan. Similarly, the cessation of the sale of new petrol and diesel cars planned within the plan timescales will necessitate infrastructure changes which are not mentioned and will apply not only to the new proposals, but also to current urban and industrial areas. Electric car charging points and on/off road charging capability must be included in plan proposals. Bicycle, walking paths and invalid car routes must be established, with secure storage locations at link points for public transport,

7 Sustainability and Climate Emergency

Energy use and carbon neutrality get little mention in the plan, but if targets are to be achieved, active development is essential. All new buildings should be required to be “Carbon Neutral” so planning requirements should necessitate district heating systems, heat pumps and effective insulation and construction. New developments should include sustainable drainage and water run off provision to minimise flooding locally and more widely.

Green belt loss is irretrievable, and the definition of green space and green belt requires clarification. Wildlife corridors must be established which are wide enough for both wildlife and people and actually join up in a meaningful way. Surface drainage is identified as an issue and must be part of the solution rather than the problem at times of climate change. Wetlands and ponds should form part of the environment even in urban areas, and ensuring environmental standards are established and implemented on the large scale must form part of the development strategy. Allotments as a green activity and for recreation should be fundamental part of any urban area, in addition to gardens and green spaces. The plan plays scant attention to these provisions particularly in the high density areas, and these needs

should be accommodated. Significant improvements to the Warrington Centre environment could be made by putting a weir downstream of the town to make the river non tidal in the centre, a parkland area with riverside walks, and a hydropower station on the discharge.

Conclusion

While I welcome many of the changes proposed in the new Plan, it can only be a starting point, and the devil is the detail, or lack of it. Unless there is a radical change in the approach to infrastructure development and a different funding approach (for instance, as in the historical New Towns policies) through local or central government, it seems unlikely that private industry will be able to fulfil needs on the proposed timescales. If the plan is overly ambitious regarding housing completions it will soon be deemed out of date. Given all the other uncertainties in these times, eg Brexit, Covid and recruitment of hauliers on which much of the Warrington industrial base relies, there is a strong rationale and clear justification to take a cautious approach to growth. The plan could be reviewed early in the plan period and additional sites allocated if completion numbers continually buck the historical long term trend. On this basis any significant release of Green Belt land at this time is premature and removes the focus from the existing urban areas which would benefit more from realistic growth proposals.