Helen Pearson

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16 June 2019

Local Plan
Planning Policy and Programmes
Warrington Borough Council, New Town House
Buttermarket Street
Warrington
WA1 2NH

Re: Proposed Submission Version Local Plan

Dear Sir/Madam

Thank you for the opportunity to comment on the Local Plan. Our observations are provided overleaf, from which we conclude that in its current form the Local Plan is **unsound**. In your subsequent deliberations, we would be grateful if you would take into account our comments in full.

Yours faithfully

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1. General

1.1. There is an unwarranted fixation on economic growth at the expense of the Green Belt. This is out of step with the current and future economic climate, where climate change mitigation can be expected to require a much greater emphasis on sustainable development; and greenfield development is inappropriate in the face of the well-documented impact on biodiversity[1].

1.2. Assessment of the demographic housing need and economically driven housing requirement both appear to overestimate the number of new dwellings required (see Sections 2 & 3). Conversely, the urban capacity is underestimated (see Section 4). Taken together, this suggests that there is sufficient existing urban/brownfield site capacity to support organic growth, the only potential issue being the rate of delivery, which could be overcome by innovative thinking and proactive policy/planning.

1.3. Although climate change is considered, it is based on an outdated assessment and the measures proposed are insufficiently wide-ranging and do not go far enough given the latest predictions of anthropogenic impact[2], government policy and advice from the government's independent advisor[3] (see Section 6).

1.4. Releasing Green Belt land requires a robust demonstration of exceptional circumstances, which is lacking and not supported by the evidence of housing need/requirements and land availability assessment (see Section 5). Similarly, the evidence presented for the allocating of employment areas on currently designated Green Belt land is founded on circular aspirational logic rather than robust economic assessment (see Section 7). When this is redressed, it appears that the apparent shortfall can be met by currently vacant floor space.

1.5. Transport modelling demonstrates that the planned development will significantly worsen congestion throughout Warrington (Section 8).

2. Local housing needs assessment[4]

2.1. Housing need is calculated from a starting year of 2017, rather than 2019, which should be used since 2014-based household projections from the ONS (Table 406) predict a steadily reducing rate of household increase – i.e. using a starting year of 2017 will overestimate the housing need.

2.2. The standard method calculates the average annual housing need using the 10-year projection of growth and dividing by 10. However, since the annual rate of Warrington household increase is predicted to halve from approximately 1% to 0.5% over the next 20 years (Table 406), using this average for the second 10 years is inappropriate. Instead, published ONS data should be relied upon for this period. This is a reasonable, evidence-based deviation from the standard method (which is not, in any case, mandated by government).

2.3. A period of 20 years is used to calculate the housing need, which although consistent with the plan length is not consistent with the SHLAA timescales, which are 15 years (see Section 4). Moreover, given the sensitivity of total household projections to the length of the plan, together with the uncertainties inherent in long-range projections, it is unclear why a plan length of more than 15 years (the minimum requirement of the NPPF 2019) is used. This is arbitrary and unjustified.

2.4. Using a start date of 2019, a plan length of 15 years, ONS household projections for 2019 to 2034, and the latest affordability factor yields a housing need of 12,145, which is within the

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[1] Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, 6 May 2019.

[2] IPCC, 2018: Summary for Policymakers. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty.

[3] Net Zero: The UK's contribution to stopping global warming, Committee on Climate Change, May 2019.

[4] Local Housing Needs Assessment, WBC, GL Hearn, March 2019.

urban capacity for the same period (13,519[5]). The corresponding figure for a plan period of 2019 to 2039 is 15,384 dwellings.

2.5. In the local plan, 30% of new homes will be affordable housing in greenfield areas, reducing to 20% for the town centre (Policy DEV2). This appears contrary to findings from the LHNA, which implies that affordable housing is most suited to central areas, given the lower house prices and rental costs.

2.6. Out of town, 20% of new housing is allocated for social housing (or 10% in the town centre)(Policy DEV2). This appears to come from an assumption made in the LHNA (para 6.20) rather than an evidence-based assessment. What is the basis for this? What evidence is there of the 20 year requirement; or that such a high percentage of social housing can be delivered and filled?

2.7. The LHNA identifies that over the period of the plan, Warrington's population growth is predicted to come from the elderly, amounting to an expected increase of 18,000 over the age of 65. To cater for this, the LHNA strongly recommends that all new homes are M4(2) compliant (i.e. housing for life). Why hasn't this recommendation been acted upon (Policy DEV2 is much weaker, requiring just 20% compliance)?

2.8. The LHNA also identifies a requirement for over 1,500 additional care beds over the period of the plan, but the specific provision identified in the main development areas of the Local Plan (Section 10) appear to be limited to 240 beds. Where is the balance of provision?

2.9. More generally, the Local Plan does not offer a vision or detailed plan of how the needs of the elderly will be realised. Will housing for life and care homes be located around community hubs, for example?

3. **Economic assessment of housing requirements**
   3.1. Overall, the method used in the LHNA to predict the economically-driven housing requirement is questionable.
   3.2. The use of recognised forecast data is reasonable, but the inherent uncertainty associated with trend-based predictions (as illustrated by their fluctuation over just a few years, which for OE forecasts amount to 921 – 635 = 286 jobs /yr) is not explicitly recognised in the analysis.
   3.3. Given the forecasting uncertainties, it is unclear why the CE forecast data is discarded, other than it is less optimistic. As it stands, this approach is akin to 'cherry picking'. CE forecast data should be included in the analysis unless or until full justification is provided for their exclusion.
   3.4. The approach taken to account for local factors lacks transparency and robustness, for example:
      • Why is it correct to adjust the OE baseline, when Warrington LA's employment rate has been in decline since 2015, steadily falling from a peak of 105,600 to 101,400 in 2018 (NOMIS May 2019) despite the new employment development in the area (e.g. Omega)[6]? In percentage growth terms, this is less than both the regional and national averages. As such, increases to the OE baseline appear unjustified.
      • Why is it correct to use the LEP's original aspirational target of 1,240 jobs /yr? This is poorly supported by a combination of claiming historical performance in growth years and taking credit for new development[7], much of which is the subject of this Local Development Plan and depends on Green Belt release. As such, use of the LEP target is at best circular and in the context of justifying redesignation of Green Belt boundaries inappropriate.
      • Why is it correct to adjust the new OE baseline by the absolute difference in jobs between the LEP target and the old OE baseline? Why isn't a proportional approach

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[5] Figures derived from Urban Capacity Statement: 13,519 = 13,729 – 210 (wider urban supply 2017-2937).

[6] Unemployment rate has stayed largely static, increasing by approximately 0.5% over the same period (i.e. accounting for about 500 of the reduction in the number of people in employment)

[7] Review of Warrington Employment Targets to 2040, A report to Cheshire and Warrington LEP, June 2017

used that reflects the overall economic climate (i.e. using the same percentage increase on baseline figures)?

- The claim that such an approach has been peer reviewed is specious, since the EDNA Update 2019 simply uses the same approach for illustrative purposes only. There is no critical consideration of the merits or otherwise of the method.

3.5. Extrapolating the annual housing requirement derived to cover 20 years is entirely inappropriate, given the large uncertainties in economic forecasting, not to mention the inevitable downward pressure on the global economy arising from climate change mitigation (i.e. as economic growth is slowly replaced by sustainable growth). As such, the economic housing requirement should be sensibly limited (e.g. to 10 years at most).

3.6. In summary, it would appear that both OE and CE forecasts should be used, together with realistic error bars, and limited to 10 years (say). No uplift for local factors is appropriate. On this basis, it would appear that a median value (when translated into housing requirements) will fall below the demographic housing need, both on an average annual basis and as a total over 10 years.

3.7. This gap may need further consideration to establish the extent to which it is consistent with predictions of future worker population and the elderly (an acknowledged growing demographic).

4. Urban capacity assessment

4.1. The Urban Capacity Statement derives a total requirement of 13,729 dwellings from a number of sources, each of which is considered in turn.

4.2. SHLAA

- The SHLAA dates back to April 2018. Why has this not been updated to provide the latest land availability figures? NPPF guidance requires an annual review of land availability. Given the implications for the extent of Green Belt land required and the exceptional circumstances necessary to prove this is the case, it seems imperative that the latest information is used.

- The period covered by the SHLAA (15 years) is inconsistent with the local development plan and more specifically, the 20 years assumed in calculating the total housing requirement. This mismatch exaggerates the shortfall, since in practice more brownfield sites would come forward over 20 years.

- NPPF guidance requires the basis for the land available assessment to be revisited if there is a housing shortfall, "for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements". Where is the evidence that this has been done?

- As one example of an unnecessary constraint, why haven't the large number of sites less than 0.25 ha in size been explicitly assessed? And another: 12% of large sites were identified as suitable, but not currently available, and appear to have been discounted. Surely, these should be followed up with landowners?

- Why hasn't year 2007/8 been taken into account when evaluating small sites windfall (Table 2.4)? This raises the average to 88/yr.

- Why haven't large windfall sites been taken into account, as allowed for in the NPPF, when there is ample historical evidence for them over a similar timeframe to the plan?

- The SHLAA admits throughout that it has taken a cautious approach, which under normal circumstances, would be applauded. However, when deciding the fate of existing Green Belt, a best estimate approach is more suitable. Table 3.8 quantifies the conservatism implicit in historical projections of completions. Its data suggest that on average the actual number of completions is 17% higher. For decisions concerning the need or size of Green Belt release, SHLAA predictions should therefore be grossed up by 17%.

- Given the exceptional circumstances needed to release Green Belt land, what pro-active steps have been taken to bridge the apparent shortfall in housing supply, for example:
  - o A further general call to developers and landowners
  - o Identification of land-banked brownfield sites, followed by targeted approaches to landowners and if necessary compulsory purchase (as required by para 119 of the NPPF 2019)
- Overall, mainly due to the pessimism of assessment, the restriction on timescales (15 years) and the potential for further sites to come forward, or to be pro-actively brought forward by policy, it is concluded that the SHLAA significantly underestimates the number of new dwellings potentially available from existing urban areas/brownfield sites. For example, grossing up the published total for 15 years by 17% and simply adding the current yearly completion average (from Table 3.8) for 5 years gives 13,578 homes. Alternatively, assuming housing becomes available at the same rate throughout the plan period gives 14,393 homes, noting that the identified forward land supply (Table 3.9) has appeared to be reasonably stable over the last 5 years (at between 9,000 to 10,000 homes).

4.3. TC Masterplan
- According to the latest TC Masterplan on the WBC website, 8,000 new homes will be developed. Where does the figure of 6,549 come from? What has happened to the other 1,500 homes? Is the reduction a result of the changes alluded to para in 3.12 et seq (or is it accounted for by housing beyond the plan?). Where is the supporting evidence for this? Appendices 1 and 2 are missing.
- Why can't the additional housing identified beyond the plan (1,816) be brought forward? Surely, this should be a priority, rather than sacrificing Green Belt land. There is no justification presented that rules this out.

4.4. Additional supply (wider urban area) to 2037
- This is identified as 210 dwellings, but there is no source reference provided. Assuming this covers 5 years from the end of the SHLAA, this equates to an average of 42 homes per annum, which seems very low. What does this figure cover and how was it derived, since it presumably excludes the small sites allowance, which is listed separately?

4.5. Small sites allowance to 2037
- This should be adjusted upwards to 440 using an annual average of 88 (see above).

4.6. Taking these factors into account suggests that the urban housing availability has been underestimated. For instance, using a best estimate for the SHLAA, a more realistic small housing allowance, and bringing forward housing in the TC masterplan, yields a total of 17,460 homes, which far exceeds the 20 year housing need (15,384, see Section 2).

4.7. Finally, from the evidence provided it is not obvious whether a review has been undertaken of the extensive land/plots that WBC own to identify suitable housing sites. Has this been completed and taken into account?

5. **Green Belt**
   5.1. Under the NPPF 2019, redrawing the boundaries of Green Belt land requires the demonstration of **exceptional circumstances, supported by full evidence and justification**. This must also include a demonstration that **all other reasonable options have been examined fully**; and that the development strategy makes **as much use as possible** of suitable brownfield sites and underutilised land.
   5.2. These criteria have not been met. More specifically:
   - The evidence presented does not support the claimed housing requirement (see Sections 2 & 3).
   - The urban capacity assessment is not comprehensive in scope or timespan and, as a consequence, underestimates the available housing capacity (see Section 4).

- There is no evidence that **all** brownfield sites and underutilised land have been identified or that WBC has been at all pro-active in approaching the owners of land-banked sites; or taken measures to unlock or compulsorily purchase land to meet requirements in accordance with para 119 of the NPPF 2019 (see Section 4).
- There is no demonstration that site assessment constraints have been revisited once it became apparent that urban capacity was insufficient (see Section 4).
- Options for developing land at Fiddlers Ferry have not been **examined fully**, but have been shelved due to 'uncertainty'. Now that it has been announced that the power station will close next March 2020, it is reasonable to expect WBC and SSE to work together closely to optimise the site's future for the good of the borough, and include planning assumptions and timescales in this plan.
- Similarly, the **absence** of a plan for Warrington General Hospital is a serious omission, given its importance for the region's healthcare and its potential impact if relocated – releasing further urban land for housing and possibly requiring Green Belt land for a new site.
- The local plan cites the requirement for more affordable housing as justification for releasing Green Belt land. However, the largest release is planned for South Warrington, where house prices are highest. The LHNA shows that the price of accommodation is cheapest in the town centre and implies this is the most realistic site for affordable homes.
- The majority of Green Belt land targeted for release is the furthest away from the town centre and will promote rather than reduce the use of cars for visiting and working in town, aggravating congestion and air pollution, which are already at unacceptable levels.

5.3. Other than for Moore nature reserve, there appears to be little acknowledgement or detailed assessment of the impact on the countryside of the major developments planned. Where are the specific assessments that identify the impact on wildlife, their natural habitats, endangered species, biodiversity in general, ancient woodland, hedgerows and agriculture. Where is the evidence that the conclusions from such assessment have been taken into account in decision-making?

5.4. Having identified the 'need' to release Green Belt land the local plan does not **prioritise** building on existing brownfield sites as it should during implementation of the plan. This principle is enshrined in the NPPF 2019 (paras 117 & 118).

6. Climate Change

6.1. With the continued lack of leadership on climate action from central government, distracted as it is by the protracted Brexit process, WBC has missed the opportunity to plan decisively for the borough's low carbon future. This is the hallmark of responsible and visionary leadership, displayed by cities such as Nottingham and Bristol, who are aiming to become carbon neutral by 2028 and 2030, respectively. Such commitment recognises the ultimate challenge of the UK becoming carbon neutral by 2050, as recently advised by the UK government's Committee on Climate Change in light of the IPCC's assessment of mankind's still increasing impact on global climate. In contrast, WBC's commitment appears to be limited to the provision of (unspecified in number) EV charging points in the town centre, a requirement for 10% of energy from new developments to derive from renewable sources, and more emphasis on walking, cycling and public transport as modes of transport.

6.2. Aspects that appear to be substantially lacking in the plan are:
- Encouraging micro-generation – why aren't all new developments (domestic and commercial) **required** to maximise their use of low carbon technologies such as PV solar and storage batteries, thermal solar, heat pumps, etc? This is a small fraction of the purchase cost. How can WBC incentivise existing households and businesses to do the same (e.g. discounts on council tax or business rates)?

- Home insulation – are building regulations sufficient or should further requirements be placed on new developments? What can be done to incentivise existing home owners and businesses to better insulate their buildings?
- EV take-up – Given the phasing out of new petrol and diesel fuelled cars and vans by 2040 (and the desire for this to occur sooner) how can WBC incentivise residents and visitors from the wider area to switch to EVs? Some examples: unrestricted use of bus lanes, free parking, free charging, free charging at park and rides.
- EV charging network – how will the growing requirement for public and domestic charging points be met?
- Electricity distribution – at least a doubling in capacity is predicted to support the switch to EVs and replacement of gas-fired heating. Is this taken into account in all new developments? How will the existing network be upgraded without causing major disruption? Can this be minimised by co-ordinating with planned development?
- Move away from natural gas – How will this be achieved (e.g. heat pumps, district heating, electric heating, hydrogen)? What does this imply for new developments and infrastructure? How will the recent announcement in the Spring Statement that new homes from 2025 will be highly efficient and will have low-carbon heating from the outset be implemented? What does this imply for Warrington as a whole over the period of the plan?
- Low carbon economy – how can WBC incentivise businesses linked to decarbonising? E.g. discounts in corporates rates for renewable businesses, use of renewable energy sources etc.
- Has biomass energy production and district heating been considered (e.g. using sustainable fuel, or municipal waste and carbon capture)?
- Isn't it time to reassess the viability of renewable energy development in the area?
- What scope is there to incentivise carbon capture and storage schemes in the area – as part of energy production (see above) or industrial processes?
- Afforestation – Has afforestation been considered, either as a carbon sink, or for sustainable uses?
- Agriculture – what can the borough do to encourage low carbon farming practices?
- Air quality – Air quality improvements predicted by the Local Plan Air Quality Modelling over the period of the plan take credit for assumed improvements in vehicle technology. However, this depends on consumer take-up, which is beyond WBC's control given its current policies.

6.3. As part of a joined up plan, delivered in part by the Local Plan, transformation to a low carbon borough can also have a positive economic benefit. For example, if Warrington became a leading developer and user of low carbon technology, associated Warrington businesses could help support the transformation of the North West, the UK, and overseas. Has WBC considered creating a centre of excellence for low carbon research and technology?

7. Economic Development Needs Assessment

7.1. The mainstay of evidence for employment area land is the revised EDNA, which largely uses historical evidence of take-up over the last 20 years. However, this completely neglects the most recent trends, which show a notable decline in demand/take-up, including:

- Council enquiries, Figure 1, which dropped by over a third from 2016/17 to 2017/18.
- Number of deals, Figure 3, which fell sharply for 3 out of 4 property types from 2015.
- Floor space transacted, Figure 4, which has reduced significantly over the last four years for 2 out of three property types.
- Value of investment deals, Figure 5, which has fallen sharply from 2014 when corrected for the sale of Birchwood Park to the council, which is not market-led.

- Vacant industrial floor space, which has risen from 82,000 to 179,000 sq m from 2016 to 2018 (Table 3). Taking into account office floor space, total vacant floor space amounts to approximately 250,000 sq m, up from 145,000 sq m in 2016.

7.2. The argument put forward that declining take-up is due a lack of availability is not supported by other evidence, such as declining council enquiries and increasing vacant floor space. No robust evidence is provided of genuine market demand (noting that anecdotal comments from property agents are an unreliable means of market assessment, given their vested interest).

7.3. The EDNA also admits that competition for logistics and warehousing business will be high given existing and future developments in the area (Omega, Omega extension, Ma6nitude (Middlewich), Parkside (St Helens), Port of Liverpool and several in greater Manchester) and describes the opportunities for Warrington as modest only. However, there is no assessment of this risk and its impact on the planned M6/M56 employment area or, indeed, the existing Omega complex (and its extension).

7.4. Moreover, employment rates for Warrington residents have declined over the last 5 years (see Section 3), which indicates that Omega has had little or no impact on direct employment. Given the ready access to surrounding areas, this is of little surprise. Similarly, any new, similarly located/connected logistics and warehousing facilities are unlikely to benefit Warrington directly, and certainly not on the South side, where house prices are the highest.

7.5. Noting the clear downward trend, the evidence presented is insufficient to support the level of employment area land recommended to be set aside, particularly since the majority is currently Green Belt land, which is protected anyway (and therefore does not need reserving as an employment area). The Strategic/Local Take-up model should therefore be discounted.

7.6. The employment based model takes into account the SEP target, which should also be discounted, since this is aspirational rather than evidence based.

7.7. The baseline employment model, which is based on OE forecast data, and appears to be reasonably rigorous in its derivation of employment land need, predicts a net requirement for 13.9 ha. The arguments put forward for discounting **all** sectors in decline are weak, and ignore the current local evidence, which is for increasing vacant floor space. Hence, the growth only requirement of 41.7 ha is not supported. Nor is the argument that the employment model should be ignored (in favour of the strategic/local take-up model) because it does not reflect historical growth (since clearly past performance cannot predict future growth). Overall, the evidence presented supports an employment area need of somewhere between 13.9 and 41.7 ha.

7.8. Taking into account other factors (i.e. 5 year buffer, displacement) in the same way as Table ES1 yields a shortfall of between 8.1 and 42.9 ha (which depends on how successful declining businesses are at repurposing). However, this does not take into account the extent of current vacant floor space, which from Tables 8 and 9 amounts to approximately 250,000 sq m, or 64.1 ha (at 3,900 sq m/ha). In other words, there is sufficient vacant floor space now to accommodate the shortfall. Where premises quality may be low, clearly it is a matter of principle to refurbish or redevelop existing sites rather than encroach on Green Belt land and exacerbate the number of empty premises.

8. Transport

8.1. Transport modelling (Warrington Local Plan Testing) appears to be very narrow in focus, assuming an average day in June, which may be optimistic. Why haven't sensitivity studies been undertaken to look at other days of the year, the impact of rain, or motorway congestion, for instance?

8.2. Nonetheless, transport modelling shows that in all scenarios traffic delays caused by the planned development are generally worse than 2016 levels. More specifically, it identifies that travel times are significantly higher on most routes (Tables 15 & 17) even with the road

infrastructure improvement proposed (but not yet funded) (Scenario 2), with worsening delays along the A57 (West), A49 (Stretton), A56 (Grappenhall), M56 (J10), M6 (J20).

8.3. This confirms what all residents already know anecdotally – that Warrington's road system is already at full capacity and further large-scale development will make matters worse.

8.4. It is noted that in the Port Warrington Development Framework, the planned rail connection does not feature in short term plans and does not appear to be committed to. Given that this is critical to reducing heavy vehicle traffic (as well as the special circumstances argument put forward for releasing Green Belt), why isn't a rail connection **required** as a pre-requisite for development.