

## **NOTICE OF PROCEDURAL RISK AND STRATEGIC NON-**

**COMPLIANCE Subject:** Governance review request regarding the proposed closure of Woolston Neighbourhood Hub **Date:** 9 March 2026 **To:** The Monitoring Officer and Chief Executive, Warrington Borough Council

**FORMAL NOTICE:** We request a formal governance review of the current proposal to close Woolston Neighbourhood Hub prior to the publication of any final Cabinet report. An assessment of the consultation framework indicates significant procedural risks, including materially incomplete equality data, potential Gunning Principal breaches, and direct contradictions with 20 adopted corporate and statutory policies.

### **1. BEST VALUE AND ASSET MANAGEMENT GOVERNANCE**

- **Government Intervention (LGA 1999):** The Council is currently under statutory Government intervention specifically regarding its failure to manage property and commercial decisions. Rushing to permanently close and abandon a community asset while under active Government scrutiny for property mismanagement presents a severe procedural and reputational risk.
- **Capital Maintenance Records:** Section 6.13 of the Capital Strategy 2025-26 acknowledges a reactive approach to capital maintenance. The £3m repair estimate must be contextualised against the cessation of planned preventative maintenance, particularly since the facility's operations returned fully in-house in spring 2024.
- **Alternative Funding Pathways:** Best Value duties require the exhaustion of external funding. There is no documented evidence of applications for Section 106 contributions or the Government's £63m Swimming Pool Support Fund (announced 2023) to mitigate energy and maintenance pressures.
- **Consultation Integrity (Gunning Principles):** The 2 March budget allocated £0 capital to the Hub. Withdrawing operational capital prior to the conclusion and review of a statutory public consultation risks being challenged as procedural pre-determination.

## 2. MATERIAL OMISSIONS IN STATUTORY IMPACT ASSESSMENTS

- **Demographic Exclusion:** The Council's Needs Assessment identifies that 75.6% of Hub users reside outside the Rixton/Woolston ward. However, the draft Equality Impact Assessments (EIAs) restrict their baseline demographic data solely to the Rixton/Woolston ward. Consulting the public using an EIA that materially excludes three-quarters of the user base risks breaching Gunning Principle 2 (providing sufficient, accurate reasons to allow intelligent consideration).
- **Neurodivergent Impact:** The Leisure EIA defines the impact on Disabled users primarily around physical mobility (e.g., pool hoists), omitting the impact on neurodivergent users. This contradicts the inclusion commitments outlined in the Council's newly adopted EDI Strategy 2025-2028.

**3. CROSS-PORTFOLIO STRATEGIC NON-COMPLIANCE** The proposal to remove this community asset operates in direct contradiction to the objectives of the following 20 adopted statutory and corporate frameworks:

- **Planning, Assets & Finance:** 1. Local Government Act 1999 (Statutory Directions - Property Management) | 2. Warrington Local Plan 2023 (Policy INF4) | 3. Capital Strategy 2025-26 | 4. The Gunning Principles of Consultation
- **Equalities & Inclusion:** 5. The Equality Act 2010 | 6. Equality, Diversity and Inclusion (EDI) Strategy 2025-2028 | 7. Warrington Strategy for Autistic People 2024 | 8. Disability Partnership (WDP) Planning Protocols
- **SEND & Children's Services:** 9. Warrington SEND Sufficiency Strategy 2025 | 10. SEND Strategy 2023 | 11. Strategy for Early Help
- **Health, Wellbeing & Adult Social Care:** 12. Joint Strategic Needs Assessment (JSNA) 2024 | 13. Living Well: Health & Wellbeing Strategy 2024-2028 | 14. Adult Social Care Commissioning Strategy 2023-2033 | 15. Carers Strategy 2025-2028 | 16. Warrington Dementia Guidance | 17. 'Happy OK Sad' Public Health Mandates (WANDS)
- **Leisure, Culture & Climate:** 18. Active Warrington Strategy 2024-2027 | 19. Library Strategy 2023-2026 | 20. Indoor & Built Sport Facilities Needs Assessment (NPPF Paragraph 98)

\*\*\* Submitted on behalf of the Save Woolston Hub Committee.