

WMBC Local Plan Review - Preferred Development Option Consultation

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1 Introduction

This response has been developed and agreed by a consortium of Parish Councils: **Culcheth and Glazebury, Croft, Winwick and Poulton with Fearnhead** as their response to Local Plan Review - Preferred Development Option Consultation.

The consortium wants Warrington and the surrounding communities to grow and thrive as places with a good quality of life. We would welcome detailed discussions and collaboration on Green Belt, housing targets, type of development and to develop a shared vision.

2 Summary

The Preferred Development Option recommends major releases of Green Belt land to provide for low density housing and motorway-dependent employment land supported by new road building. This will directly prejudice the development of Warrington from a New Town to New City. It is wasteful of land, would destroy the integrity of the Green Belt, would entrench car dependency both in Warrington and the wider area, increase inequality, increase climate change gas emissions and ultimately be unsustainable and incompatible with a high quality of life either for existing or new residents who will live on estates with few facilities and be dependent on congested roads for work, education, shopping and leisure trips.

There is an alternative that would lead both to Warrington becoming an exemplar, sustainable town or city with a high quality of life. We would like to see the following specific changes:

- **Reduction in the plan period to 15 years** with an early review after five years to ensure that Warrington is genuinely moving towards a 'New City' and is not just extending low-density suburbs on currently open land. This will also allow accelerating retail trends, the effects of Brexit and potential availability of the Fiddlers Ferry site to be assessed. The latter would change the whole balance of planning in Warrington. It is essential that irreversible changes to Green Belt boundaries do not prejudice this. Housing figures¹ would be as follows. Either:
 - Use the new Government centrally calculated figure for **Objectively Assessed Need (OAN) of 914 houses per year**. A 15 years plan (including 5% 'flexibility' allowance) would require **14,395 new houses**, which is less than the identified urban capacity. In this case **no Green Belt release is needed. This is our preferred option.**
 - If the Council retains the **accelerated growth assumptions**, then the 1,113 target is reduced by the ratio of old and new OAN figures to 1,065. A 15 years plan (including 5% 'flexibility' allowance) would require **16,773 new houses**, which is slightly below the theoretical urban capacity but within the margin of error for calculation of this sort. If housing densities were increased as outlined below and flexibility was maintained with central land-use allocations **no Green Belt release is needed.**
- **Increase proposed gross housing densities: Warrington should adopt a minimum housing density standard of 80 and 100 dph within 800 m of the centre and in the centre respectively, and in all other areas 50 dph for houses and 70 dph for apartments.** The

¹ See 'Housing targets section for calculations and an explanation of methodology.

current proposed density is 20² dwellings per ha (dph) in the 'garden suburb', and 30 dph elsewhere. PDO figures assume only 75% of land would be used, so the actual densities are 15 and 23 dph. These densities waste land and are far too low to encourage development of local facilities, use of public transport or encourage walking or cycling. New housing estates with low densities become car-dependent and do not develop either a good sense of community, quality of life or sustainability. Higher densities avoid the need to use Green Belt, improve the quality of life for new residents and would allow Warrington to develop as a 'New City'.

- **Retain the current Green Belt boundaries for the 15 years plan period.** Reduction of the plan period, denser and higher quality development in central Warrington and other urban areas, plus the potential availability of the Fiddlers Ferry site means that no changes to the Green Belt boundaries are required. Warrington has had a huge outward expansion as part of the New Town programme. A more measured growth will allow Warrington to grow sustainably. This will also allow time to see if the accelerated growth estimates submitted as part of the devolution bid are realistic. We think the Green Belt assessment is defective as it does not address the strategic reasons for Green Belt designation. We believe the case has not been made for the 'exceptional circumstances' required by national guidance for Green Belt boundary alterations.
- **Delete references to 'Garden City Suburb'.** There is a consensus in the town planning profession that 'Garden' Cities and Suburbs have characteristics such as land value capture for the benefit of the community, community ownership of land and long-term stewardship of assets, mixed-tenure homes, genuinely affordable housing and integrated and accessible transport systems. (TCPA, 2017). These characteristics are not mentioned in the Preferred Development Option, which seems to be a low-density housing estate. The label 'Garden City Suburb' is seriously misleading and should not be used for this proposal.
- **Review the 'Western Link' road.** Current development proposals outside the town centre area are dependent on car and lorry transport. This new road could be environmentally destructive, lead to a large increase in car commuting, and journeys seeking to avoid tolls on the Runcorn bridges, and increase noise, severance, air pollution and climate change gas emissions. The consultation lacked a detailed argument about the benefits of the overall scheme and further work is needed to assess benefits from the six options.
- **Review the Interim Sustainability Appraisal.** It is uncritically biased towards the economic development and growth agenda and appears to simply justify the option that the Council has already chosen. It ignores the effects of increased climate change gas emissions, the destructive effect of major new road building, increased car dependency and the waste of land and resources resulting from development of low-density suburbs.

² PDO quotes 20 dph, but at an assumed 75% developable area, this equates to 15 dph. Redevelopment in the urban area require less new infrastructure, so developable area will be higher.

While we have reservations about the accelerated growth scenario included in the LEP devolution bid, these proposed changes would allow resultant housing growth to be accommodated within the town centre and existing urban areas without the need for release of Green Belt land for housing.

3 New Town to New City

Warrington has been a proud, independent town for much of its history, set between Manchester and Liverpool, but not dominated by either. Good north-south communications also mean strong links with Cheshire and Lancashire and their peoples. Now that New Town development is complete, it makes sense for Warrington to consolidate its position and seek to provide more central housing, facilities and attractions to reduce the need for residents to travel outside the borough. The Parish Councils are supportive of the principles behind the concept of Warrington transitioning.

The most successful European cities with the best quality of life combine higher densities of employment and housing towards the centre with easy access to good quality countryside close to the city. They rely less on cars, and more on well-developed public transport and cycling networks.

3.1 'Garden' Cities and Suburbs

There is a consensus in the town planning profession that 'Garden' Cities and Suburbs should have certain characteristics to merit the term. The Town and Country Planning Association has carried out a significant amount of research to define what characteristics have led to the high quality of life and success of garden suburbs (TCPA, 2017). These include land value capture for the benefit of the community, community ownership of land and long-term stewardship of assets, mixed-tenure homes and housing types that are genuinely affordable and integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport, etc. These characteristics are not mentioned in the Preferred Development Option or master planning document, which seem to imply a low-density housing estate that would be constructed for maximum profit by volume house builders. To use the label 'Garden City Suburb' for the development proposed in the plan is seriously misleading.

The most successful English 'garden' developments (Letchworth and Welwyn) are outer London suburbs, very different to Warrington and with substantial outbound commuting. Some 'garden suburb' developments have not been successful. Wythenshawe Garden Suburb still struggles despite proximity to Manchester Airport, the greatest growth generator in northern England. The reasons are complex, but probably too many of the 'garden suburb' characteristics outlined above are missing. This appears to be the case with the Warrington 'garden' suburb too.

4 Green Belt policies

4.1 What has the Green Belt ever done for us?

Paragraphs 79 and 80 of the NPPF sets out the role and purpose of the Green Belt in England, as follows: *'79. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence'*.

NPPF para 80 states that Green Belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;

- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and specialist character of historic towns; and
- Assist in urban regeneration by encouraging the recycling of derelict and other urban land.

NPPF endorses the permanence of Green Belts as an essential characteristic (paragraph 79) and says that: *'Once established, Green Belt boundaries should only be altered in exceptional circumstances ...'* (paragraph 83).

Crucially NPPF para 84 states that *'when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable development.'*

The Local Plan Core Strategy was adopted in July 2014. This emphasised a regeneration first strategy, and recognised that Warrington was both nearing its natural limits to expansion and that New Town development had had few benefits for the established urban areas of Warrington.

Core Strategy Strategic Objective W2 was *'To maintain the permanence of the Green Belt and the character of the countryside in the borough and protect them from inappropriate development.'*

This plan was submitted to public consultation, examination in public and was adopted just three years ago. **What could have changed so much in the last three years to require the very large-scale building and urban sprawl now proposed for existing Green Belt?**

R (IM Properties) v Lichfield DC and others (2014), established that Plan-making and decision-taking should consider the consequences for sustainable development of any review of Green Belt boundaries. Patterns of development, resource use (including agricultural land) and additional travel are clearly relevant. The current proposals do not include an assessment of the consequences for sustainable development e.g. additional travel although it is clear that the increase in car traffic and car dependency will be large, necessitating substantial new road building. The effect on urban regeneration is not assessed.

4.2 Green Belt assessment methodology

The key weakness of the methodology adopted is that it takes a pragmatic, small-scale approach to assessing small individual parcels of land to identify which are of the 'least value'. It almost completely ignores strategic issues such as the need to reduce urban sprawl. The original north west Green Belts were very different to those elsewhere in the country and were the first to be designated primarily to encourage urban regeneration.

Purpose 1: To check the unrestricted sprawl of large built up areas

The methodology assumes that if the parcel is separate from the built-up area then it has a lesser role in preventing sprawl. In fact, if isolated parcels are developed, then additional pressure will bear on the parcels of land nearer Warrington, which, developers and landowners will argue should be developed to 'round off' the urban area.

Purpose 2: Prevent neighbouring towns merging into one another

This uses an arbitrary definition to include Culcheth and Lymm, but NOT Burtonwood, Winwick and Croft. It is not obvious why the methodology assumes that it is acceptable for Burtonwood to merge with Warrington, but not Culcheth? Actually, none should merge.

Purpose 3: To assist in safeguarding the countryside from encroachment

The methodology relies on the flawed concept of the visible openness of the Green Belt 'in terms of the absence of built development, a topography which supports long line views and low levels of substantial vegetation'.

This has the effect that if there is a wood between a proposed new development and existing settlement, then 'openness' and Purpose 3 would not be compromised. What, for instance would happen if the wood was removed? Would the new development be demolished and the land returned to Green Belt?

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The methodology does not address this purpose. The intent is to restrict green field site availability so that investment is directed to derelict and other urban land. Therefore, the contribution of every parcel of Green Belt land that could be developed is strong.

In summary, the methodology is concerned only with suggesting the least worst land to take out of the Green Belt and does not consider the overall strategic benefits of an intact Green Belt. If there is large scale release, then Purpose 5, which was the main reason for designation of Green Belts in the northwest fails completely. The consultants who produced the Green Belt assessment concede that *'it is important to emphasise that this is a theoretical exercise'* (para 136).

The Parish Councils strongly oppose proposed policy W2 to release Green Belt land for housing and employment.

5 Plan period

5.1 Government Policy

WBC propose a 20 years plan period. National Planning Policy Framework para 157 states: *'Crucially, Local Plans should: '... be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date ...'*.

This establishes a clear presumption that the plan period should be 15 years unless there are other compelling reasons, and the onus is on the local authority to show that 15 years is not appropriate. WBC have given no reasons as to why a 20 years period has been preferred over the clear NPPF presumption of 15 years. Developers and landowners prefer longer plans as they can then argue for release of Green Belt land. This allows them to cherry-pick the most profitable sites.

The Greater Manchester Strategic Framework (GMSF) is intended to run to 2035. Assuming WBC LP is adopted by 2020, a 15 years plan period would fit both with Government guidance and GM plans.

5.2 Hover skateboards

One good way to determine if a plan period is reasonable is to look back a similar period and see if changes could reasonably have been anticipated. In 'Back to the Future' (1985) Marty McFly rides a levitating hoverboard in 2015 to escape Griff Tannen and his gang. Come 2015, levitating hoverboards were still not available. Prediction is more difficult further into the future you go.

20 years ago (1997) Tony Blair became Prime Minister, the average house cost £71,248, Princess Diana died and Hong Kong returned to Chinese rule. Warrington Town were relegated back to Division One of the NW Counties League, while now they stand on the verge of National League North.

Many trends may be accelerating: on-line shopping, technological innovation, home working, and the move to city living in Manchester and Liverpool. Brexit adds a layer of uncertainty that may reduce or expand the economy, but will certainly change patterns of trade and employment and create completely new trends that cannot be anticipated now.

A 20 years local plan carries a high risk of sub-optimal for the first few years and irrelevant towards the end.

5.3 Fiddlers Ferry

The PDO notes three times that Fiddlers Ferry power station may come forward for development during the proposed plan period, and would represent a major brown field opportunity. The PDO suggests that the site might continue to be used for electricity generation. It is understood that Northern Powerhouse Rail (HS3) could use the route of the mineral railway past the site, although since basic electrification of even one TransPennine line is uncertain, prospects for HS3 probably require the services of Mystic Meg.

Fiddlers Ferry uses coal, which is being phased out. Although it can be co-fired with biomass, this is in short supply. In 2015 the Department of Energy and Climate Change proposed that the UK's remaining coal-fired power stations will be shut by 2025 with their use restricted by 2023. Owners Scottish and Southern Energy intended to close three of the four generator units by April 2016. Short-term contracts were secured, but the plant will shut soon. The high site value for residential or mixed development suggests it will become available for development. This has advantages:

- The site is over 100 ha. Some of it has high wildlife value, parts may be prone to flooding or difficult to remediate. But it is realistic to expect 50 ha would be available for a genuine sustainable urban extension. At 50 dph, this gives at least 2,500 dwellings.
- It is served by a railway (including internal tracks). If not needed for HS3, it could be isolated from the national rail network and converted comparatively easily and cheaply to a light rapid transit system (tram) that would serve Warrington Centre (Bank Quay low level), Sankey Bridges/Penketh, Widnes Centre, Bridgefoot and Latchford. The scheme would be extendable and development profits would be enough to fund the scheme.
- If the railway corridor is needed for HS3, development is still possible.
- Site is brownfield and would require no Green Belt release

A compact city-style truly sustainable development here would provide an exemplar for other towns and is the approach that has led to sustainable new communities in many northern European cities. It would need consideration now, in this local plan.

5.4 Economic growth assumptions

The high level of housing development proposed in the PDO result from the choice of a higher economic growth assumption. The economy of Warrington is relatively strong, and stronger than most of its neighbours. There is a risk that adopting high growth targets will relocate employment from poorer areas rather than creating new jobs.

Similarly, there is a risk that building additional houses could simply relocate residents from areas with a poorer environment or fewer jobs. This will not only harm urban regeneration, but actively create new areas of dereliction in these areas. It will harm their economies and mean that they do not meet their housing targets, leading to pressure from developers to build on their open spaces and Green Belt.

This is a particularly high risk given that Greater Manchester has also selected a high-growth option in their draft Strategic Framework (GMSF). The Campaign to Protect Rural England response to GMSF (CPRE, 2017) contained a detailed demographic analysis from an independent expert demographer. It concluded that *'there is a real evidence gap to address in terms of what is the source of all the new people to fill the jobs and homes'*.

A similar independent demographic analysis is needed for the Warrington growth forecasts.

5.5 Plan Period - how long?

The uneven development of Warrington transitioning from New Town era, the pace of change of technology, policy and world events, changes to the economy that cannot be anticipated and the likely but not certain availability of a very large brown field site all point to the fact that the proposed 20 years plan period is far too long. It would be sensible for the period to be ten years.

However, the cumbersome nature of plan preparation combined with the strong steer from Government policy, suggest the plan period should be 15 years unless in the absence of compelling reasons why not. It is therefore proposed that:

- The plan period should be 15 years with an early review after five years
- The Fiddlers Ferry site should be included and positively planned for in this local plan.

6 Housing allocations

6.1 Town centre and Riverside

We have reviewed the nature of allocations in the town centre and riverside and believe that the allocations for commercial uses (including retail and employment) are too optimistic. Currently there are many retail voids, few offices and the area around Warrington Central remains largely vacant.

A key issue is the uncertainty whether jobs will follow residential development (or the other way around) and at what point a critical mass will be reached (as exists in Manchester and Liverpool city centres) where the availability of both skilled workers and concentrations of employers builds a virtuous circle with quality housing growth in the centre.

We consider that flexibility should be built into the allocations so that plots can be developed tactically. This would mean a change in the split so that there is more residential/mixed development and less pure commercial or retail. Flexibility would be built in so that buildings were designed with conversion in mind - this is common in Germany. If 5 ha of town centre or riverside land was re-designated for housing, then at 100 dph, additional 500 dwellings could be provided.

6.2 Housing densities

Housing densities are important. They are a key factor in increasing sustainability and reducing energy use. The evidence is summarised in (Hall, 2014). If more people can be housed, in particularly

mixed-use areas then good shopping educational and leisure facilities become much more viable. The need for travel is reduced and high-quality walking and cycling routes can be provided and a much higher standard of public transport can be supported with lower subsidy and cheaper fares. Car dependency, noise and severance can be reduced and air quality improved. Space that would have been occupied by roads and parked cars can be reduced and more land is available for people.

High densities are sometimes associated with overdevelopment or a poor environment. However the good practice outlined below and in (Hall, 2014) shows that this would not be the case here.

Densities can be measured in different ways. The PDO uses a standard measure of dwellings per hectare (dph) as a net figure (so the gross, or actual amount of land needed will be much larger when roads, public open space and other facilities are included). The PDO suggests 30 dph, which is average for standard volume-built suburban development, but suggests a very low figure of 20 dph for the 'Garden City Suburb'. This represents an extra-ordinary low density of development with just 15 dwellings for each hectare taken out of the Green Belt (as 25% of land is used for roads, etc.) Given the landowner and developer understandable imperative to maximise profit, it is easy to see that these will be large houses with multiple cars, unaffordable to most people. The low density makes it difficult to house enough people within easy reach to support local services, public transport, walking and cycling routes or indeed any sense of community as many of these people choose to drive out of the borough rather than spending their money in Warrington and its centre. This will be a fatal blow to Warrington's ambitions to move towards a city.

The London plan (Mayor of London, 2015) shows another way forward. It uses both dph and habitable rooms per hectare, which is often more appropriate as it takes account of the type of dwellings. London's target densities for suburban areas reach a maximum of 130 dph. The absolute lowest density requirement set out in the London Plan is 35 dph for areas with the poorest public transport access. In Warrington, there is no need to build houses in areas with poor public transport.

Transport for Greater Manchester helpfully produced an 'Evidence Paper on Site Optimisation for Housing Policy – Critical Friend Review' (GMCA, 2016) which looked at housing density policy and what could be achieved. It recommended within Tier 1 centre boundary the minimum housing density should be 70-100 dph, and areas with good public transport accessibility 50 for houses and 70 dph for apartments. TfGM prepared a note detailing 12 examples of high density development in Greater Manchester where these densities have already been achieved. These did not of course include Warrington, but many of the examples were comparable to areas in Warrington.

Entries for the Wolfson Economic Prize 2014 showed that high housing densities were compatible with a garden city atmosphere. The Shelter entry for the Hoo Peninsula (Shelter, 2014) provided 15,000 dwellings at 30 – 90 dph, with an average of 60 dph. This included 40% open space and 37.5% affordable housing.

6.3 Good European practice³ – Freiburg, Germany

Freiburg is a small city of 230,000 people (comparable to Warrington) which builds around 1,000 houses a year. Although Germany doesn't have formal Green Belt, outward expansion of Freiburg is

³ Personal experience – the author visited Freiburg in 2017 and has extensive experience of other European developments.

constrained by strict landscape designations. Housing growth has been concentrated in redevelopment areas 1-2 miles from the town centre. A typical suburb is Vauban, on a former military base 3km from the centre. Built 2000-10 it houses 5,000 people in 2,000 new dwellings with 600 jobs at a net density of 95 dph, mainly in human-scale 4 and 5 storey buildings with no high-rise blocks. Public transport and cycle use are both high and car use low. There are some local shops and a cafe, but as it takes 10 minutes either to cycle or take public transport to the centre, most people use central facilities. Despite the high density for a suburb, the quality of life is high, energy use and costs are low, and Freiburg is often cited as 'Germany's happiest city'. Warrington has former military sites, and could choose this type of development too.

Freiburg is a good example of what is called a 'compact city'. There are numerous examples particularly in the Netherlands (Randstaat) and Germany where compact city development has created popular, high quality living which makes best use of land.

In Britain examples are limited. Cambridge has shown what can be achieved by a local authority and other stakeholders with a shared vision and is building high quality housing at high density.

6.4 What is the right density for Warrington?

As an aspiring 'City', Warrington needs to concentrate housing where it can take advantage of good public transport and other facilities. These new residents will provide customers that in turn will make these facilities more viable. New residents will create activity, and will cycle, walk and use public transport for more of their journeys meaning less space is required for driving and parking cars. This is a virtuous circle that will lead to further improvements to the quality of life in the centre and make Warrington more attractive. The increased density will make it unnecessary to build on green field and Green Belt locations where access to facilities are poor and the only realistic method of transport is private car.

Developers and land-owners will suggest that these sites are unviable. But the housing market in Warrington is buoyant, and the move to city status will make Warrington increasingly attractive to people seeking a high quality of metropolitan life within good train services to Manchester, Liverpool and London. Requirement for higher density development will accelerate transition to a New City and will create a whole new property market.

Warrington should adopt a minimum housing density standard of 80 and 100 dph within 800 m of the centre and in the centre respectively, and in all other areas 50 dph for houses and 70 dph for apartments.

7 Housing targets

7.1 Housing targets retaining existing assumed densities

The new Government centrally calculated figure for Objectively Assessed Need (OAN) in Warrington is 914, which is comparable to but about 5% lower than the previous OAN of 955.

The Warrington local plan PDO uses the growth assumptions in the LEP devolution bid to arrive at a figure of 1,113. Reducing this by the ratio of old and new OAN figures leaves 1,065.

If the plan period is reduced to 15 years then it is reasonable to assume that the 15,429 dwellings urban capacity would remain the same as the restricted availability of greenfield sites and

Warrington's transition to a New City would lead developers and investors to accelerate urban redevelopment.

The PDO adds 847 as a 'backlog from 2015 against OAN'. Given the new Government OAN is a calculation based on current figures as a future projection, there is no logic to retain this element.

For a 15 year plan the new OAN is 13,710, plus a 5% flexibility allowance⁴ = 14,395 which could all be built on brownfield and urban land.

If the plan is reduced to 15 years but the Council decides to retain the uncertain accelerated growth assumptions, the housing requirement is $1,065 \times 15 = 15,975$, which is slightly below the theoretical urban capacity but within the margin of error for calculations of this sort.

If delivery fell short, the key could be Fiddlers Ferry which is discussed above and is almost certain to become available during a 15 years plan period. This would provide the shortfall in the latter years of the plan (say years 10 to 15).

7.2 Housing targets with assumed higher densities

With higher density requirements, it becomes even easier to accommodate predicted housing growth, even with ambitious growth. The increased densities make much better use of land, facilities and infrastructure and make it possible for growth to be accommodated without change to Green Belt boundaries will into the next plan period. We may even have hover skateboards by then.

8 Transport

Warrington has a recognised transport problem. Census 2011 figures show car ownership is above the national average and the reliance on the car for the journey to work is higher than the national average (75% of journeys to work are by car with single occupant). This has implications for air quality, road safety and health both in the town centre and the Parish areas represented by this response.

The location near major Motorways and the legacy of low-density, car-based New Town development patterns has fuelled a high degree of car dependence with associated problems of congestion, poor health (both from lack of exercise and air pollution) noise, increasing climate change gas emissions from transport, severance and reduction in sense of community. Significantly fewer people than the national average achieves recommended daily exercise levels; this is partly due to the lack of active travel in everyday journeys. Census 2011 suggests Warrington has significantly more inward and outward car commuting (49,172 journeys in, 34,737 journeys out compared with 50,422 within the borough).

Between 2000 and 2015, car traffic increased by about 8%, but cycling dropped as a proportion of travel to work from 3.5 to 2.8% - about 20%, and in absolute terms by 12%. Fewer people walk compared to either the northwest or national averages, and the trend is towards less walking. Bus use shows a dramatic decline of 40% in the five years to 2016. Warrington BC cycle and walk data suggests a slightly less gloomy picture, but the overall evidence suggests a sustainable travel crisis.

⁴ Government requirement. Warrington has a good record of delivery, so the figure is restricted to 5%.

The draft plan recognises some of these issues (with the notable exception of climate change which appears to be ignored), and then proposes a pattern of development with very low-density suburbs (20-30 dph) that would reinforce car dependence and make transport problems worse:

- Very low-density suburbs that are difficult to serve with effective public transport.
- Very low-density suburbs also unnecessarily lengthen walking and cycling distances both to the town/city centre and make new local facilities much less viable.
- Substantial new road building which will entrench car-dependency for the next generation- this also makes active lifestyles less likely and poorer health overall more likely.
- Central area congestion relief from the Western Link may be short-lived as traffic generation uses up spare capacity, and congestion becomes a problem again.
- The Western Link will encourage peripheral traffic movements and make journeys into Warrington centre relatively less convenient or attractive. This will further decentralise journeys, and encourage development that is not connected to the town centre.
- The Western Link consultation lacked a detailed argument about the benefits of the overall scheme and further work is needed to assess the benefits that might be realised by the six options.
- The plan proposes no high quality⁵ public transport, cycling or walking links to Warrington centre.

There is a clear alternative. The dominant form of urban development in northern Europe is the 'compact city' model. This produces much higher densities (typically 60 to 100 dph), usually in dwellings with a larger floorspace than typical UK dwellings. This allows viable concentrations of both city and local services with the potential to provide both fixed public transport links and high quality, attractive and convenient walking and cycling links. In this way, communities have much lower car use, accessibility is improved for the whole population, not just individuals with access to a car, and as a result, compact cities enjoy a much higher quality of life than the low-density suburban development proposed in the PDO.

We think that the Preferred Development Option should be altered to:

- Concentrate development with high densities (minimum 50 dph, rising to 80-100 dph in Warrington centre) of both housing and employment in areas of high public transport accessibility.
- Provide fixed-link public transport and high quality cycle routes to at least the standard of [GM Cycle Design Guidance](#) (TfGM, 2014) before any substantial new sites are developed.
- The Western Link should be reviewed, and a fixed-track public transport network with a complementary network of quality cycle and walking routes investigated. This will bring Warrington in line with better European practice and best UK practice (e.g. Cambridge).

⁵ Defined as tram or segregated busway; most northern European cities would not consider a busway to be 'high quality'.

9 Sustainability Appraisal and Climate change

Sustainability Appraisals (SA) are difficult. Supposedly independent, they are commissioned, managed and paid for by the organisation promoting the development. The SA acknowledges that Climate Change and resource use are issues, but downplays or ignores:

- Land use, particularly permanent loss of the best and most versatile agricultural land
- Climate change gas emissions – transport and new housing estates
- Car dependency, health and lifestyle issues

The SA sets objectives relating to climate change, energy efficiency, and production of renewable energy but only evaluates them superficially. More work is needed.

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11.1 Abbreviations and acronyms

DPH	dwellings per ha
GMSF	Greater Manchester Strategic Framework
LEP	Local Economic Partnership
NPPF	National Policy Planning Framework
OAN	Objectively Assessed Need (for housing)
PDO	Preferred Development Option

End of document