

WBC Local Plan Proposed Submission Version

'We are in a Climate and Environmental Emergency'

'Right now, we are facing a man-made disaster of global scale, ... the collapse of our civilisations and the extinction of much of our world is on the horizon. The world's people have spoken, their message is clear, time is running out ... They want you to act now. Leaders ... you must lead.' - David Attenborough

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1 Introduction

This response has been developed and agreed by **Culcheth and Glazebury** and **Croft Parish Councils** as their response to Local Plan Review - Proposed Submission Version.

We want Warrington and the surrounding communities to grow and thrive as places with a good quality of life. We welcome some of the detailed changes to increase development in the town centre, reduce housing numbers and Green Belt development and provide more affordable homes.

But the world has moved on. Since the PDO was issued we know more about **climate change and the environmental crisis**. We are also in an **obesity crisis** largely fed by car-dependency and lack of active travel that is set to overwhelm our communities. Yet the Proposed Submission Version of the plan still proposes major releases of Green Belt land to provide for car-dependent low-density housing and motorway-dependent employment land supported by new road building.

The choice is clear. We are in climate change, environmental and obesity crises. **We cannot just repeat the same old pattern of development that has created these crises**. We understand the constraints of Government policy and we understand the pressure from developers. But the time is right for Warrington to lead the field. We can use best practice to develop a pattern of development that stops urban sprawl, reconnects people to their communities, provides a fairer society and shows the way for others. We would like to help the Borough Council to develop that shared vision.

2 Summary – could do better

While the Proposed Submission Version contains several welcome changes to increase development in the town centre, reduce housing numbers and Green Belt development and provide more affordable homes it still recommends major releases of Green Belt land to provide for low density housing and motorway-dependent employment land supported by new road building. The ‘Vision – Warrington 2037’ relegates climate change and environmental considerations to the bottom of the list. There is apparently no objective to reduce climate change gas emissions, even though the Government wants to cut greenhouse gases to zero by 2050.

The current plan remains 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.

We are sympathetic to the fate of the Core Strategy where an aggressive developer used a High Court Challenge to delete the housing target. But this judgement and the potential for future legal action was negated by subsequent adoption by central Government of the Objectively Assessed Need (OAN) methodology. We believe there is no justification for:

- A plan period of 20 years - there is too much uncertainty and over 15 years is not required.
- For choosing a housing figure higher than the Government centrally calculated OAN
- Including a 10% flexibility allowance rather than 5%.
- Retaining two ‘historical’ years within the proposed plan anyway.

There is a better way. There is an alternative that would lead both to Warrington becoming an exemplar, sustainable town or city with a high quality of life:

- We propose a reduction in the housing allocations in the plan to 15 years.
- We propose to use the Government OAN of 909 houses per year.
- We propose the normal 5% 'flexibility' allowance.
- We propose an early review after five years – earlier if necessary.

15 years x 909 x 5% 'flexibility' means sites for 14,317 homes are needed

It is agreed that at least 13,726 urban capacity has been identified

Even without identifying further urban capacity – for instance from the hospital site, Fiddlers Ferry or further retail decline, no Green Belt release is necessary.

On **Green Belt policy** we welcome rejection of most of the sites put forward by developers. We believe the changes suggested above would allow **retention of the current Green Belt boundaries with minor modifications for the plan period.** The case has simply not been made for the 'exceptional circumstances' required by national guidance for Green Belt boundary alterations.

For the HS2 Phase 2b route the assessment of the contribution to the Green Belt of some parcels of land has been downgraded. There is a danger that if land is allocated for development because its protection has been downgraded for a specific HS2b route but that the route is changed or maybe HS2b is not built at all then the land will have been developed on a false premise. **We suggest that where two assessments of contribution to Green Belt exist, then the stronger assessment should be used for the purposes of this plan.**

We object to the use of the phrase 'Garden Suburb' in the plan on the basis that this demonstrably does not follow Garden City principles and is misleading. This allocation is simply a very low-density car-based suburban housing estate no different to hundreds of others. On this basis, the proposed development is wasteful of Green Belt and agricultural land, disperses population and creates a whole new generation of car dependency. **The allocation should be deleted.**

We welcome adoption of higher densities in the centre of Warrington. But without consideration of habitable rooms per hectare and type (flat or house), this could result in small, inflexible flats that provide poor living conditions and slums for the future. Densities outside the town centre are still too low, waste land and will not 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 sustain better facilities. **The town 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.** Additional densities based on habitable rooms per hectare would also be appropriate.

Fiddlers Ferry is a large site that will become available within the plan period. Yet this is excluded from the plan, a negation of planning. The Statement of Common Ground (March 2019) is silent on the issue. **The future use of the Fiddlers Ferry site should be considered within the plan.**

Land use and transport planning are intrinsically linked but while the council are carrying out LTP4 consultation at the same time as the Local Plan, they appear only loosely connected. Land-use and transport planning must be considered together if we want to create of quality places. Neither the draft LTP4 or the draft local plan give any detail on what arrangements should or could be put in place to allow this integration. The only firm schemes in LTP4 are car-based. This does not suggest that public transport, walking or cycling will be encouraged or thrive during the LTP4 period.

3 Housing numbers and plan period

Housing numbers are important. Too low, and there will not be enough homes to meet genuine need. But too many and substantial areas of productive farmland and Green Belt land will be eaten up in an unsustainable sprawl. Urban regeneration will stall as developers inevitably favour sites that are easier to develop. There is no evidence that over-delivery on the scale envisaged by the draft plan would make homes more affordable: new house prices are always related to existing prices in the area. The plan envisages a minimum of 18,900 new homes (average 945 per year) between April 2017 and April 2037.

Our submission in this area relates to:

- ‘Objectively’ Assessed Need (OAN) - should Warrington adopt a higher target?
- What is the right ‘flexibility’ allowance?
- Is a plan of 20 years rather than Government suggested 15-year plan period correct?
- When should a forward plan start? Is 2017 correct?
- Does additional building make housing more affordable?
- How do you deal with uncertainty?

3.1 Government ‘Objectively’ Assessed Need (OAN)

Central Government requires use of a standard national formula called Objectively Assessed Need (OAN) which takes account of need¹, affordability and past under or over-delivery. The calculated figure for Warrington is **909 dwellings per annum (dpa)**. Warrington has chosen to increase this arbitrarily to **945 dpa** due to an assumptions about employment growth and affordability.

NPPF para 60 requires the local planning authority to use the OAN figure unless *‘unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.’*

The Responding to Representations Report suggests that the increase from 909 to 945 (about 4%) is needed to *‘support the number of jobs that will be created from Warrington’s future economic growth and to address current issues of affordability.’* However, this is flawed for three reasons:

- OAN already considers affordability – no additional allowance should be made for this.

¹ Despite the use of the word ‘objective’ in the title, the original formula used 2014 based household projections. Government has chosen to ignore an updated lower rate of household formation as this did not fit a political pledge to reach an arbitrary target for new homes nationally.

- The prediction of the number of jobs created uses assumptions fed in by Warrington creating circular and subjective arguments. Future predictions of employment are purely speculative in a region where retail is imploding, and where the effect of Brexit (what form it will take or even whether it will happen) on the job market is uncertain.
- It does not address the NPPF para 60 requirement to consider '*current and future demographic trends and market signals.*' There is no real demographic analysis to show how Warrington might develop under different scenarios.

A speculative employment growth forecast and an incorrect (double – because it is already part of the OAN calculation) application of an element for affordability (considered further below) do not make the '*exceptional circumstances*' that would justify an alternative approach' The correct approach would be to **use the OAN as required by Government and to use the first five-year local plan review to see if growth has indeed led to problems with cross-border commuting.**

3.2 What is the right 'flexibility' allowance to add?

The standard allowance is 5% but in the face of developer demands for a 20% buffer, the Council has arbitrarily increased housing figure 'flexibility' to 10%. They claim have reviewed recent Local Plan examinations in confirming this figure although they give no examples. It looks very much like the 10% was a tactical decision to give developers at least part of what they wanted and reduce opposition and the potential for judicial review rather than an objective decision.

Warrington can hardly be objectively accused of under-delivery. Despite recent slowing of growth, in just 50 years² New Town development has almost doubled the population and extent of the town and recent developments include building out the large area of the former Burtonwood Air Base.

There is no evidence of long-term under-delivery, and a 10% allowance is a gesture to developers from a nervous Council. **The 'flexibility' allowance' should be 5%.**

3.3 How do you deal with uncertainty? – 15- or 20-years plan?

There is no set period for a local plan. Traditionally local plans and UDPs covered a 10-year period as even a decade could see three different national Governments with different land-use policy and practice, significant changes in the national and world economy and demands such as European legislation and local governance changes that simply couldn't be anticipated further ahead. Even then, ten-year plans quickly became out of date.

NPPF 22 suggests '*Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.*' Para 21 suggests that not all policies will be strategic. For housing allocation, the guidance is the site should allocate:

- Years one to five specific: deliverable sites
- Years 6-10: specific, developable sites or broad locations for growth,
- Years 11-15 specific, developable sites or broad locations for growth where possible

This makes it clear that while strategic policies should be for 15 years or longer, that site allocations only need to be for ten years, and only broad locations for years 10-15, and even this should be

² Warrington was designated as a New Town on 26 April 1968.

‘where possible’ for years 10-15. Taking this Government recommended approach would allow development to be directed to urban regeneration for years 10-15, with potential that a range of sites including Warrington Hospital, vacated retail sites and even Fiddlers Ferry could be available.

As the burden and cumbersome nature of plan making has increased for various reasons, the temptation is to extend plan periods, even where this makes no sense due to uncertainty. WBC propose a 20 years plan period. The futility of this approach is illustrated by looking back a similar period and see if changes that happened could have been reasonably anticipated. In ‘Back to the Future’ (1985) Marty McFly rides a levitating hoverboard in 2015 to escape Griff Tannen and his gang. Levitating hover boards are still not available.

20 years ago (1999) Tony Blair was Prime Minister, the average house cost £72,000. Things that were totally normal in 1999 included:

- Rewinding VHS tapes after watching a movie.
- Getting all your fashion advice from a magazine
- Playing Snake on a green-screened Nokia phone.
- Saving all your files on a floppy disk.

Many trends are 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 migration, trade and employment and create completely new trends that cannot be anticipated now.

Politically there will be four or five more general elections within the plan period. The only way to deal with this level of uncertainty is to plan for the shortest practical period, with the flexibility to review parts of the plan more often than the suggested five-year cycle.

A 20 years local plan will be sub-optimal for the first few years and irrelevant towards the end. What is the point? This is not planning.

3.4 When should a forward plan start? Is April 2017 correct?

A local plan is a forward plan. While recording the past is important in identifying needs and trends, years that have already past have no place in the forward planning part of a plan.

PPG says ‘*authorities will need to calculate their local housing need figure at the start of the plan-making process*’, but the next sentence also says ‘*This number should be kept under review and revised where appropriate.*’, a clear indication that the number and baseline can be changed.

For a forward-looking plan, it is non-sensical to include two years where housing has already been completed as part of the planning process. These can’t be planned as they have already happened. 17/18 and 18/19 saw 359 and 402 completions, which means with an annual target of 945, it forces the rest of the plan period to provide 1,129 more houses than are needed according to the OAN methodology. PPG states that ‘*it is not a requirement to specifically address under-delivery*’ in previous years.

The simplest solution would be to rebase the plan from 1 April 2019 to exclude the two years 17/18 and 18/19 that have already happened. This leaves an 18-year plan. Which is what it is anyway as

17/18 and 18/19 can't be planned. Limited adjustment would be needed to some draft plan documents.

3.5 Does additional building make housing more affordable?

Are affordability issues about both the failure of new construction to keep up with the projected increase in the number of households, and to the lack of homes forcing up prices? Para 3.4.14 suggests that *'A lack of housing supply over the longer term is likely to increase house prices, making housing less affordable for Warrington's residents, young people looking to get on the housing ladder. It will also reduce the supply of affordable housing to meet Warrington's needs.'*

The suggestion that additional building will make housing more affordable is an urban myth without true evidence. New homes are less than 10% of the annual volume of housing choices, and house prices are set by the 90% market volume of other sales. The average price of new homes is therefore very similar to that for all houses and is very insensitive to the number of new homes built.

Supplying more homes does not reduce the overall price of homes as (almost uniquely in northern Europe) homes in Britain are seen by individuals and commercial interests as investments as much as places to live. Prices follow the strength of the national economy, the availability of domestic and non-UK finance, various property taxes and investor confidence. This means that building more homes does not change prices in predictable ways or make homes more affordable.

3.6 Crisis, what crisis?

Even in 2017 when the last version of the plan was issued, the extent of the climate change, environmental and obesity/active travel crises were less well appreciated. Since then, we now know that bold steps are needed to make our development patterns more sustainable. We are facing:

- Major, irreversible climate change if we do not make significant changes now
- Major degradation of habitats we depend on and extinction of species
- Huge public health challenge and costs from car dependency and lack of active travel

The current version of the plan and accompanying 'sustainability appraisal' are oblivious to these well-documented threats. Land-use planning has a significant influence and it is our duty to use this influence to avert these crises which are more important than arcane housing number disputes.

3.7 Summary.

The Council reported in the Responding to Representations Report that *'Developers are generally supportive of the housing target'* and that *'Developers and Agents have expressed general support for the Council's assessment of Urban Capacity and the conclusion that Green Belt land will need to be released.'* This high level of support suggests that the balance of the plan is too far in the direction of landowners and developers and that they can't believe their luck.

We believe that:

- **The plan period should be reduced to 18 years** by rebasing it to April 2019,
- **The housing target should be 15 years**
- **Specific housing allocations** should only be made for the **first ten years**

- The presumption should be that **development in years 11-15 would be concentrated in the urban area and on previously used sites** as this will be essential to avert the climate change, environmental and obesity crises.

Table 1 Summary of WBC proposed and alternative plan period and housing requirements

	WBC	Suggested modification
Annual target	945	909
Plan period target	18,900 (2017 to 2037 – 20 years)	13,635 (15 years)
Flexibility allowance	1,890 (10%)	682 (5%)
Total Requirement	20,790	14,317
Current urban Capacity	13,726	13,726
Green Belt Requirement	7,064	Negligible

Adoption of these simple changes would allow Green Belt boundaries to stay intact for the whole plan period, as indeed was envisaged by the previous Core Strategy.

4 Green Belt policies and allocations

Green Belt is the only British planning policy that is even understood let alone supported by a significant part of the population. And there is good reason for this. Single-handedly Green Belt has checked the unrestricted sprawl of large built-up areas, safeguarded the countryside from encroachment, prevented neighbouring towns from merging, protected productive agricultural land and helped urban regeneration. It is logical that landowners and developers attack Green Belt as it prevents them from realising huge windfall profits. Sadly, it has also become fashionable for professional planners to attack Green Belt as an option to meet housing targets that is easier than tackling the messy business of urban regeneration.

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. This plan was submitted to public consultation, examination in public and was adopted just a five years ago. **What could have changed so much in these few years to require the very large-scale building and urban sprawl still proposed for current Green Belt?**

Our submission in this area relates to:

- Support that most Green Belt development proposed by developers has been rejected
- Objection to allocations OS2 and OS3
- HS2 phase 2b
- Protection of valuable agricultural land, including to ensure UK food security
- Sustainability of Green Belt development

4.1 Rejection of most proposed Green Belt development

It is a curious feature of the British planning system that the starting point of local plans is the 'Call for Sites'. This raises an expectation in landowners that they might suddenly become very rich. An enormous and inefficient use of resources then tries to prove that sites that would never be considered suitable for housing are in fact the perfect site for suburbia. A less-well resourced effort

is then required by local people seeking to defend their communities. We welcome that most of the various green field sites put forward by owners have been rejected. This is not sustainable development and goes against the purposes of the Green Belt.

We are grateful that most of the suggested sites to the north of Warrington have been rejected and support the assessment that these rejected sites contribute to the Green Belt. We are however alarmed by proposals such as

4.2 Objection to allocations OS2 (Croft) and OS3 (Culcheth)

It is claimed by the Council that *'Green Belt release in the outlying Settlements will increase housing choice and support the vitality and viability of local services.'* (3.4.10) No evidence is provided that 1,100 houses are needed in outlying communities - this seems to be a random figure. Indeed, some communities are deemed substantial allocations, some to need no additional housing at all.

Culcheth, Glazebury and Croft are thriving as communities and there is plenty of market housing currently available including 3 and 4-bed and larger houses. While much of this is 'unaffordable', there is no evidence that additional supply of market houses makes homes more affordable. See section 3.5 in this submission for evidence. We do accept that there is a need to provide particularly for older and younger people who wish to remain within our communities, and that there is a case for truly affordable housing (note – not the definition currently adopted by central Government). But none of these needs are served well by a simple allocation of a chunk of land for housing. Policies OS2/3 paragraph 2 suggests the sites should contribute to the Borough's *'general ... housing needs, including family homes with gardens'*. These are exactly the sort which attract car commuters, and which are in current plentiful supply in Croft and Culcheth. Policies OS2/3 will encourage the products provided by national volume builders, to the detriment of genuine local need.

Our objections to the actual sites allocated are as follows:

OS2 (Croft) 'minimum of 75 homes' – part of parcel CR4

Croft is a small community with limited facilities. It has a scanty and declining bus service. The site is 5km from Birchwood Station (Padgate is a similar distance but has a service that is almost unusable) which suggests that any rail travel would still involve local traffic generation. Local roads are busy and in practice almost all trips from or to the site would inevitably be car-based.

The Green Belt assessment suggests that parcel CR4 makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to one, and no contribution to two giving a Moderate contribution overall. This is the same assessment as parcel CR5, which comes out with a 'Strong Contribution'. Only subjectivity could explain why CR4 has not been given a 'Strong Contribution' too, and we think the assessment should be reviewed and updated.

Documents submitted by the applicant suggests that the developer would be Bellway Homes, a national volume builder that specialises in market housing and standard designs across Great Britain with little variation or concession to local styles. It is highly likely that a Bellway or another national volume builder will seek to provide as much standard 3 or 4 bed houses as possible and use the viability assessment method to challenge affordable housing provision. We **oppose this allocation** on the basis that the **site makes a major contribution to Green Belt purposes and that no evidence**

has been provided to suggest that further houses in Croft from a national volume house builder **would neither increase housing choice nor support the vitality and viability of local services.**

OS3 (Culcheth) 'minimum of 200 homes' – parcel CH9

The document produced by the promoter is the usual self-justifying nonsense. Apparently *'Story Homes are very supportive of the release of sustainably located Green Belt sites'*. They suggest they want *'to provide the sites the market wants, especially in areas such as Culcheth'* and *'sites the market wants'*. Like the Croft site (OS2), these would attract additional car commuters that would add little to the village and certainly not increase housing choice or support the vitality and viability of local services. Story Homes consider that the Site performs a *'moderate contribution to safeguarding the Story Homes consider that the Site performs a moderate contribution to safeguarding the countryside from encroachment.'* This is a bizarre assessment as the site is no more than a simple encroachment into the countryside itself.

Story Homes also note that development *'could be extended further east to accommodate a significantly larger site than proposed, approximately 400-500 dwellings.'* This shows that the intention is that this development would enable further encroachment into the countryside.

The parcel is judged to make a moderate contribution to two Green Belt purposes, a weak contribution to one purpose, and no contribution to two purposes and therefore overall weak. The methodology is of course subjective, and it is hard to see how an area that is very open and constitutes an essential gap between settlements can be judged weak.

This site is about 8 ha, which at the 30 dph minimum housing density proposed would yield 240 houses rather than the 200 suggested in OS3. If the site is released from Green Belt, then the area should be reduced to under 7 ha to reflect the requirement for 30 dph. A denser form of development would allow less land to be released.

Like Croft, Culcheth has poor public transport links. Two daytime buses per hour and a limited and declining evening and weekend service means the area is not a sustainable one to expand. Culcheth is not near a rail station and using Birchwood inevitably means additional car journeys.

We oppose this allocation on the basis that the **site makes a major contribution to Green Belt purposes** and that **no evidence has been provided** to suggest that further houses in Culcheth from a national volume house builder **would neither increase housing choice nor support the vitality and viability of local services.**

Alternative methodology of providing for local need

There may well be a local need for housing other than market housing in the plan period. This could be for older or younger people who want to stay in the area, or genuinely affordable housing (such as that directly owned by a social housing provided, or a Community Land Trust) that is available in perpetuity. While no such assessment at a Parish level has been carried out, it is possible that such a need could arise.

This need could constitute the 'very exceptional circumstances' needed to approve an application in the Green Belt in which case the Green Belt boundary should be left in the current position.

Should OS2 or OS3 be approved against our wishes, we would wish to see strict conditions ensuring that **all the units should be homes for younger and older people, and genuinely affordable homes to meet local need that are available in perpetuity.**

4.3 HS2 Phase 2b (Crewe to Manchester including Golborne spur)

The assessment of the contribution of parcels of land to the Green Belt has been reviewed following refinement of the HS2 Phase 2b including downgrading some of the assessments. We think this is wrong as HS2b, whatever the overall sustainability credentials will have a significant urbanising impact on the landscape and make parcels more important in ensuring the openness of the countryside. For instance, The HS2 route makes site R18/041 between the village and the linear park important in retaining the openness of the Green Belt.

HS2b is a complex and expensive project which is deeply political. There is plenty of opportunity for delay, route changes (including deletion of the opposed Golborne spur) and even cancellation. A Hybrid Bill is expected to be deposited in 'early 2020'. Royal Assent and start of construction could theoretically be in 2023 and the first passengers could travel on full HS2 services in 2033³.

It would be wrong to downgrade protection of Green Belt land because of a project that may never happen – at least in the currently proposed form. There is a danger that land is allocated for development because its protection is downgraded for a specific, HS2b route but that the route is changed or maybe is not built at all. This would then have resulted in land that makes a major contribution to the Green Belt being developed without good reason. **We suggest that where two assessments of contribution to Green Belt exist, then the stronger assessment should be used for the purposes of this plan.**

As well as significant disruption for the extended construction period, we are also concerned that HS2b will cut off the route between Croft and Culcheth (Wigshaw Lane) resulting in reduced access to education, shops and other services. HS2b brings a high degree of uncertainty into planning for the area overall and this is not reflected in plan policies meaning that they will become out of date.

4.4 Protection of valuable agricultural land

Almost all the land proposed for removal from the Green Belt for housing and employment use also results in a loss of the best and most versatile agricultural land which will become more important following Brexit with the need for the UK to produce more of its own food. Based on the farm-gate value of unprocessed food in 2017, the UK supplied just under half (50%) of the food consumed in the UK. The leading foreign supplier of UK food were countries from the EU (30%)⁴.

The plan claims that the '*value of agricultural land was a consideration in the options assessment and sustainability appraisal process*'. However, it is not clear how this affected or changed any of the assessments, if at all. The loss of a significant amount of the best and most versatile agricultural land should be set against the 'exceptional circumstances' that the Council claims for its release.

We are also concerned about farms size as holdings are split into smaller units. This will reduce farming income and viability and increase pressure for development of the remainder.

³ <https://www.hs2.org.uk/timeline-2b/> accessed 20/5/19

⁴ <https://www.gov.uk/government/publications/food-statistics-pocketbook-2017> accessed 14/6/19

4.5 Exceptional Circumstances?

Does the assumed need for housing land constitute the ‘exceptional circumstances’ required to remove land from the 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 the increase in car traffic and car dependency will be large, necessitating substantial new road building. The effect on urban regeneration is not assessed.

Overall the potential to reduce the need to allocate land by shortening the plan period and reducing the flexibility allowance to a normal level, together with the likely availability of large areas of additional brownfield land means that apart from minor changes, there is no need to make wholesale changes to Green Belt boundaries at all. **The ‘exceptional circumstances’ to remove land from the Green Belt simply don’t exist.**

5 ‘Garden’ Suburbs and Garden City principles

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 major research to define what characteristics have led to the high quality of life and success of garden suburbs. 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 draft local plan or master planning document, which seem to imply a car-dependent low-density housing estate that would be constructed for maximum profit by volume house builders and laid out along a spine road. There has been a suggestion that true ‘Garden City’ principles could be incorporated in supplementary planning guidance at a later stage once the local plan is approved.

This suggestion is fanciful. It is hard to see how any true ‘Garden City’ principles will emerge if they are not incorporated now.

The ‘Garden City Suburb’ still envisages a very low density. This represents an extra-ordinary low density of development with around 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.

We object to the use of the phrase ‘Garden Suburb’ in the plan on the basis that this demonstrably does not follow Garden City principles and is misleading. This allocation is simply a very low-density

suburban housing estate. On this basis, the proposed development is wasteful of Green Belt and agricultural land, disperses population and creates a whole new generation of car dependency. **The allocation should be deleted.**

6 Housing allocations and densities

Sustainability means building in locations that are well-placed for high quality public transport and good local facilities and have a genuine potential for high levels of walk and cycling are essential.

- High quality public transport – frequent rail-based or other quality mass transit, not just a couple of buses an hour.
- Developments that are built around walking and cycling, not around a road with car parking.
- Local facilities mean the full range of shopping, leisure and education, not an estate with a supermarket, petrol station and the odd primary school.
- Developments are dense enough to make it viable to provide the walking and cycling routes, public transport and local facilities that are required.

As we explained in our response to the PDO, housing densities are critical. 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 the same area, 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.

6.1 Town centre

The town centre and surrounding area meets the criteria above. We understand that the Council have reviewed urban capacity in the town centre. We still believe that the allocations for commercial uses (particularly retail) are too optimistic. Since the PDO, the retail sector has collapsed further and there are more retail voids. Although there have been some completions, planning consents and proposals, progress remains slow and the area around Warrington Central remains largely vacant.

We consider that flexibility should be built into town centre allocations so that plots can be developed tactically. This would mean a change in the split so that there is more residential or 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.

There are detailed issues with the town centre allocations. For instance, Parcel C3 (Cockhedge ASDA) has been shown as being retained in commercial use rather than mixed use, apparently after representations. This site is very close to the centre and unsuited to long term use as a conventional supermarket with expansive surface car parking, particularly as residential and education uses are becoming more common in the area. Retention as purely commercial site risks wasting an area with high public transport (and potentially walking and cycling) accessibility. There is an opportunity for a high-quality mixed-use, residential led development perhaps including education and co-working on this site.

6.2 Housing densities

Section 3.4.5 suggests that following the Preferred Development Option consultation the Council has reviewed its density assumptions for the Town Centre and inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development in these locations. The Council is proposing minimum density requirements for the Town Centre, together with minimum requirements for all site allocations to minimise the amount of Green Belt release.

While we welcome these changes, they do not go far or fast enough. We are facing climate change, environmental and obesity crises in Warrington.

High densities are sometimes associated with overdevelopment or a poor environment. However, (Hall, 2014) shows that this does not have to be the case here.

Densities can be measured in different ways. The local plan confusingly uses 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 local plan suggests 30 dph, which is average for the standard volume-built suburban development which is so wasteful of land and energy. This density was achieved for most of the New Town era. **We can do better than this.**

In our last submission we requested that the local plan used both dph and habitable rooms per hectare, which is often more appropriate as it takes account of the type of dwellings. This approach was used in The London plan (Mayor of London, 2015). 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.

We again point the Council towards the Transport for Greater Manchester '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.

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.

What is the right density for Warrington? We welcome the review of housing density, and those proposed for the town centre are now more appropriate. But the mass of suburban housing still constitutes wasteful, unsustainable low-density sprawl.

We welcome adoption of higher densities in the centre of Warrington. The town 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 Fiddlers Ferry – the elephant in the room

Government want coal power generation to cease by 2025. Therefore, the site will come forward for development within the plan period. It is a major future brownfield redevelopment opportunity.

Since our PDO submission, the Council have issued further justification for excluding the site from local plan considerations by stating *'The owner and operator of Fiddlers Ferry Power Station have indicated that the site will be vacant within the Plan period for potential employment uses. However, this is likely to be near the end or beyond the Plan period and will require decommissioning and could remediation before it is brought back into active employment use.'*

Let's get this straight. A 100-ha site that will become available during the plan period has been excluded from consideration on the basis that it is big, complicated and the owners are not currently interested in alternative uses. **This is a shameful abdication of planning.**

- Some the site has high wildlife value, parts are prone to flooding or need remediation. But it is realistic to expect 50 ha would be available for a genuine sustainable urban extension (or other major use such as a hospital). At 50 dph, this gives at least 2,500 dwellings.
- It is served by a railway (including internal tracks). If not needed for Northern Powerhouse Rail, 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, Sankey Bridges/Penketh, Widnes Centre, Bridgefoot and Latchford. The scheme would be extendable and development profits would fund the scheme.
- 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.

The Fiddlers Ferry site is close to the boundary with Halton, and redevelopment could serve some of that boroughs housing and employment land needs as well as potentially providing a light rail line to Widnes and beyond. Tn place over the potential.

The future use of the Fiddlers Ferry site should be considered within the plan.

8 Transport and Local Transport Plan 4 (LTP4)

Land use and transport planning are closely linked but while the council are carrying out LTP4 consultation at the same time as the Local Plan, they are only loosely connected. Land-use and transport planning must be considered together if we want to create of quality places. Neither the draft LTP4 or the draft local plan give any detail on what arrangements should or could be put in place to allow this integration.

While the strategy tries to suggest a balance which includes walking, cycling and public transport, in the past, Warrington LTPs have delivered almost exclusively new roads and extra highway capacity with limited bus 'improvements' which have not even retained existing patronage. Very limited improvements have been made to rail (Warrington West), and even this has been at the expense of effective closure of Sankey station which only retains a couple of daily trains. Warrington has allowed most of the TPE trains to be diverted away from the town. There has been a low level of

spend on walking and cycling within the area, and the New Town legacy of walking and cycling routes has been wasted.

The LTP4 strategy does not attempt to identify which issues are most important in Warrington and surrounding communities for social and environmental development. The emphasis is on roads as a way of moving cars around and ignores the role of development and place-making. This is at odds with best practice in other areas - even Greater Manchester is well ahead.

A thorough approach to the District Centres as shopping and service centres should be taken and their 'health' examined carefully. Public realm should be high quality and traffic must not dominate communities. This could come through short term placemaking and people friendly schemes for which are good value for money, ease congestion, encourage walking and cycling and improve people's physical and mental health.

Despite a lack of adequate evidence, the plan focusses on major highway schemes which would increase car dependence, increase congestion elsewhere and increase pressure for unsustainable land-use patterns. They will also make air quality worse and increase climate change gas emissions.

Major schemes such as the Western Link and other highway capacity improvements take a high proportion of the potential transport funding for the area. This would make other transport interventions impossible to fund and would also attract people from and damage existing sustainable travel modes.

Cycling remains the mode with the greatest potential to reduce local congestion, improve health and boost the economy. There is some recognition of this, and the routes identified are good places to start, but there is no detail and the conclusion is that development of cycling would be patchy.

Mass transit corridors are suggested for investigation, but the local plan makes no provision for safeguarding land or securing developer contributions. The corridors will probably end up as half-hearted bus schemes with slightly better bus stops.

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.

The location near major Motorways and the legacy of low-density, largely 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.

The draft plan recognises some of these issues (with the notable exception of climate change which is 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.
- No high quality⁵ public transport, cycling or walking links to Warrington centre proposed.

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. As a result, compact cities enjoy a much higher quality of life.

We think that the plan should both reserve space for and encourage provision of 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.

9 Sustainability Appraisal and Climate change

We criticised the Sustainability Appraisals (SA) presented with the PDO. Little has changed. Supposedly independent, SAs 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:

- Climate change crisis – which the draft plan would make worse
- Environmental Crisis – degradation and loss of habitats
- Obesity/Active Travel Crisis – Car dependency, health and lifestyle issues
- Permanent loss of the best and most versatile agricultural land

It is now Government policy to cut greenhouse gases to zero by 2050. The plan – which is intended to last until 2037 – most of the way to 2050 takes no account of this new initiative which will clearly need much stronger local plan policies. To proceed on the basis on inadequate policies will run the risk that the plan is found unsound.

⁵ Defined as tram or segregated busway; most northern European communities would not consider buses or any form of busway to be 'high quality'.

The SA sets objectives relating to climate change, energy efficiency, and production of renewable energy but only evaluates them superficially. We repeat our comments on the PDO version of the plan that more work is needed to tackle the three crises above.

We feel the treatment of Manchester Mosses SAC (Risley and Holcroft Mosses) has been superficial, and the large-scale urbanisation proposed in the plan would have a significant and unpredictable impact on the plan that has simply been ignored. The environmental assessment on the mosses has been superficial and does not include the significant effects from increased traffic and associated emissions that would result from the plan.

We further think that the plan should consider restoration and re-wetting of existing mosses, former moss land and re-creation elsewhere. There have been large-scale and effective re-creation of moss land elsewhere in England. The [Great Fen Project](#) will create a huge wetland area for the benefit both of wildlife and of people. We would like Warrington to show similar ambition.

11 References, abbreviations and acronyms

GMCA. (2016). *Evidence Paper on Site Optimisation for Housing Policy – Critical Friend Review*.

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Shelter. (2014). *Shelter's entry to the Wolfson Economics Prize MMXIV*.

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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