

## Winwick Parish Council response to WBC Local Plan Proposed Submission Version

‘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 **Winwick Parish Council** 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 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 invite the Borough Council to develop a shared vision with us.

## 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 allocation of Peel Hall for housing and major releases of Green Belt land for low density housing and motorway-dependent employment land supported by new roads. The 'Vision – Warrington 2037' relegates quality of life considerations to the bottom of the list. There is apparently no objective to reduce climate change gas emissions.

The current plan remains wasteful of land, would cause untold misery for residents around the proposed Peel Hall development, destroy the integrity of the Green Belt, 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. **This is not a legacy to leave for future generations<sup>1</sup>**.

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.

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<sup>1</sup> See draft Salford Local plan for good practice in how to deal with inter-generational and other equalities.

**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.
- We propose an alternative, sustainable future for Peel Hall

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

**It is agreed that at least 13,726 urban capacity has been identified although we think the true figure is higher – the collapse of retail continues**

**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.

**We object to the use of the phrase 'Garden Suburb'** in the plan on the basis that this allocation does not follow Garden City principles and is misleading. It 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.

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 need<sup>2</sup>, 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.
- The prediction of the number of jobs created uses assumptions fed in by the Council 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.

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<sup>2</sup> 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.

- It does not address the NPPF para 60 requirement to consider ‘*current and future demographic trends and market signals.*’ There is no 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 years<sup>3</sup> 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 surrender to developers from a nervous Council. **The ‘flexibility’ allowance’ should be 5%.**

### 3.3 Dealing 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 ‘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.

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<sup>3</sup> Warrington was designated as a New Town on 26 April 1968.

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 (not that we use fashion advice)
- 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?

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*'.

The simplest solution would be to rebase the plan from 1 April 2019 to exclude the historic two years 17/18 and 18/19. 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. New homes are under 10% of annual sales, 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 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 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. Building more homes does not 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 Responding to Representations Report suggested ‘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 plan is biased towards landowners and developers.

#### We believe that:

- The **plan period should be reduced to 18 years** by rebasing to April 2019,
- **Housing target should be 15 years, with specific allocations** only for the **1st 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 will 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 easy option to meet housing targets.

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 not benefited 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?** If they have changed so much in so short a time, then it demonstrates why a shorter plan is needed.

MD4 (Peel Hall) is not currently green belt and we deal with this site in section 5

### 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 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.

### 4.2 Objection to Policy OS9 – Land to the north of Winwick

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 -130 in the case of the small settlement of Winwick Village and some larger ones apparently need no additional housing at all to remain viable.

Winwick is thriving as a 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 community, 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. Policy OS9 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 Winwick. Policy OS9 will encourage the products provided by national volume builders, to the detriment of genuine local need.

Our objections to the actual site allocated in OS9 is as follows:

- Winwick is a small but well defined and self-contained community, the village itself cut off from the wider area of Warrington by the huge physical and psychological severance effect of the M62 and the need to cross Junction 9.
- It has a reasonable bus service but the precipitous decline in patronage (40% in 6 years) suggests it would be unwise to base future development patterns on availability of bus services.
- The site is about 5km from the Warrington Rail stations, although difficult access means that for journeys towards Liverpool or Manchester Newton-le-Willows station (about 3km away) which has recently been improved would be the natural choice. Slow and inconvenient bus links and the general hostility of the area to walking and cycling 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.

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 Winwick from a national volume house builder **would either increase housing choice or 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. It is possible that land adjacent to the settlement boundary, or some of the land at Winwick Playing fields, in the heart of the community could be suitable to meet this need and might **constitute the 'very exceptional circumstances' needed to approve an application. In any case the Green Belt boundary should be left in the current position.**

**This should not be taken as an indication that the Parish Council would support any such allocation or planning application, more that this issue requires serious examination.**

Should OS9 be approved against our wishes, we would wish to see strict conditions ensuring that **all the units should be to meet local need, including homes for younger and older people, and should be genuinely affordable in perpetuity.**

### 4.3 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 such as substantial new road building.

The potential to reduce the need to allocate land by shortening the plan period and reducing the flexibility allowance, together with the likely availability of large areas of additional retail and brownfield land means that 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.**

### 4.4 ‘Garden’ Suburbs and Garden City principles

‘Garden’ Cities and Suburbs should meet certain characteristics to merit the term. The Town and Country Planning Association define these to 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 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.**

The ‘Garden City Suburb’ still envisages a very low density representing 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.). The landowner and developer maximise profit, so the development will inevitably be unaffordable large houses with multiple cars. The low density makes it difficult to support local services, public transport, walking and cycling routes or indeed any sense of community as residents drive out of the borough rather than spending their money locally.

**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 provide higher-density housing around fixed public transport nodes.**

## 5 Peel Hall – Policy MD4

### 5.1 Summary

That so many attempts over many years to develop Peel Hall have failed suggests that not only is the form of development envisaged by both the developer and the Local Plan Proposed Submission Version **not deliverable** (able to be built now or in the near future), **but it is also not developable** (able to be developed for housing in the form envisaged at all).

. We think that allocation is wrong for three reasons:

1. Low-density car-based development will always create a level of **traffic, parking and other problems such as road danger, noise and pollution** that will overwhelm existing and new communities. **Convenient access cannot be created** without extensive new roads.
2. The site is near a **major motorway** which brings permanent problems of noise and air pollution. The form of development envisaged by both the developer and the Local Plan cannot deal with these issues and still create tolerable living conditions for new residents
3. The **constraints and burdens** placed on the site from proposed Policy MD4 and previous appeal decisions suggest the site is **not developable** (able to be developed for housing in the form envisaged) as well as not currently deliverable.

We further think that the form of low-density development proposed is wasteful of land, and ensures a car-based development that creates unsustainable climate change gas emissions, deters walking, cycling and public transport use (active travel) in a way that **increases obesity and other health problems in direct contravention of other parts of the local plan and other Council policies**. The proposed allocation would prolong the **climate change, obesity and environmental crises**.

Peel Hall is an important green lung for the north of Warrington. To waste it with low-density housing would ensure it would never be a green space again. Warrington faces an unprecedented period of change, including the potential need for a new hospital close to the urban area. Alternative uses we would like to see explored include:

- Country park (with associated leisure) that would allow residents new and old to connect with green spaces and the countryside and to improve their health.
- New hospital – the existing site is cramped and very close to the town centre. It would be ideal for redevelopment as a higher-density urban quarter which would really solidify the regeneration of Warrington Town Centre. Wasting Peel Hall for low-density housing, would force any new Hospital onto the Green Belt and itself be road-dependent and unsustainable.
- Higher density housing (12ha @100 dph) on the western part of the site could be served by a rail-based rapid transit system on the A49 leaving 4/5 of Peel Hall as a country park.

We do not specifically endorse any of these options, but all are more sustainable and a better use of land than the current proposal. We feel the Borough should exploring the best use of the site with the local community. This is what good town planning looks like – not a top-down imposition.

We are not against development at any cost; we understand that areas need to and do change. But the type and form of development would devastate the local community with little benefit to existing residents and will entrench an unsustainable form of development for a generation.

## 5.2 Peel Hall, LTP4 and transport

Many attempts have been made to develop Peel Hall over several decades. While the general standard of application has been poor, there is a golden thread that most of these attempts have failed on transport issues including congestion, pollution, danger from vehicles, air quality and noise. Transport is key to what, if any development is possible (independent of whether it is desirable).

Warrington has a transport problem. Census 2011 shows car ownership is above the national average; 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) and increasing. This has implications for air quality, road safety and health both in the Peel Hall and wider Winwick areas.

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 and **there is a real possibility that the Warrington bus network could disintegrate in the next five years unless transport and land-use planning is integrated**. Warrington BC cycle and walk data suggests a slightly less gloomy picture, but the overall evidence suggests a sustainable travel crisis.

Land use and transport planning are closely linked but while the council are carrying out Local Transport Plan 4 (LTP4) consultation at the same time as the Local Plan, both plans are only loosely connected. Land-use and transport planning must be considered together if we want to create of quality places. Neither draft LTP4 or the draft local plan give any detail on what arrangements should or could be put in place at the Peel Hall site to allow this integration. Following the recent appeal, we note that the developer was either unwilling or unable to agree any bus proposals, and it is probably impossible to serve the proposed sprawl with an effective bus service.

While the LTP4 strategy tries to suggest a balance which includes walking, cycling and public transport, previous Warrington LTPs have delivered almost exclusively new roads and extra highway capacity. Limited bus 'improvements' have resulted in a 40% drop in patronage in the last six years. Very limited improvements have been made to rail. Spend on walking and cycling has been minimal.

The LTP4 strategy does not attempt to identify which issues are most important 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.

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.

Mass transit corridors are suggested for investigation including the A49 which is close to, but not into the Peel Hall site, 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. The focus on highway capacity would attract people from, and damage existing sustainable travel modes and would make other transport interventions (such as a rapid transit scheme for the A49) impossible to fund.

The legacy of low-density, largely car-based New Town development patterns has fuelled a high degree of car dependence in existing communities 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 largely due to the lack of active travel in everyday journeys. **Peel Hall must not be developed as 'more of the same'.**

The draft plan recognises some of these issues (apart from climate change which is ignored), and then proposes a pattern of development with low-density suburbs (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 quality<sup>4</sup> public transport, cycling or walking links to Warrington centre proposed.

The lessons for Peel Hall are clear. **Any attempt to develop the site on the currently proposed low-density car-based model will exacerbate existing and create new transport issues. These will create poor conditions of noise, congestion, road danger and air quality issues for new residents, and make the problems for existing residents worse. This is not a sustainable development proposal. Peel Hall must not be developed as 'more of the same'.**

### 5.3 Is the site developable under MD4?

Policy MD4 is long (comparable site policies within GMSF are half the length). While on the surface the site appears to be easily developable, the list of constraints from both the site and appeal decisions are formidable:

- Very substantial road infrastructure, probably including a bridge over the M62
- Significant capacity increases at the M62/A49 junction
- 30% affordable homes, custom and self-build plots and residential care home
- Bus priority, bus services, walking and cycling infrastructure
- SUDs, healthcare, education, sports pitches and changing, open spaces, major new park, play areas, green infrastructure, etc., etc., etc.

The Viability assessment produced by consultants for the Council appears to suggest that the site could be developed, including a contribution to affordable housing. But this is generic, and they have used a standard cost list. We think that the constraints, particularly road infrastructure have not been properly costed and that the real costs of development would be far higher. Any requirement for a bridge over the M62 could sink the scheme on its own.

The consequences of site being unviable with all these constraints are severe. Either the site would be developed without features considered essential (such as no affordable housing, or no

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<sup>4</sup> Defined as tram or segregated busway; most northern European cities would not consider a busway to be 'high quality'.

greenspace, or no public transport?), leaving a community that had a poor quality of life and ready to become a slum of the future<sup>5</sup>. Or perhaps no development at all. In this case, failure would allow developers to build on unsustainable estates almost at random in the Green Belt<sup>6</sup>. We think the Borough should be very careful about pretending that MD4 can ever lead to a viable development that provides a good living environment.

In summary, we think the **constraints and burdens** placed on the site from proposed Policy MD4 and previous appeal decisions suggest the site is **not developable** (able to be developed for housing in the form envisaged at all). The site either needs to be developed in a different way, or an alternative form of sustainable development proposed for Warrington. **Peel Hall must not be developed as 'more of the same'**.

#### 5.4 We can do better than this

There is a clear alternative to the standard UK low-density volume house builder suburb. In the most recent Peel Hall appeal, the Inspector referred approvingly to evidence on development at Cambridge North. This is based on the dominant form of urban development in northern Europe: the 'compact city' model. This produces much higher densities (typically 60 to 100 dph), usually in homes with a larger floorspace than typical UK dwellings. This allows viable concentrations local services with the potential to provide both fixed public transport links and high quality, attractive and convenient walking and cycling links. These communities have much lower car use and 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.

The plan should both reserve space for and encourage provision of fixed-link public transport along the A49 and require high quality cycle routes to at least the standard of [GM Cycle Design Guidance](#) (TfGM, 2014) before any substantial new sites are developed.

In their response<sup>7</sup> to this suggestion the Borough suggested '*be careful what we wish for*'. The clear message was that '*as an unprotected site in the existing urban area*' that if Compact City was adopted '*it would be inevitable that Peel Hall would be developed and developed at a higher density*'.

**This is a simple, unworthy threat to scare the community** into accepting an unacceptable development by claiming the alternative is worse. It is also a complete misunderstanding of both the Compact City model and the process of planning for several reasons:

- Compact City development only takes place in areas with good transport accessibility<sup>8</sup>. Most of Peel Hall has poor accessibility and would therefore not be suitable for development.
- Other areas in Warrington could be better suited to Compact City development. This would need to be part of a proper borough-wide planning study. A development based on a light rapid transit route to the south of Warrington could accommodate most of the green field housing required, with substantially less land required, even in the south of the borough.

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<sup>5</sup> Bradley Stoke is a good example, but there are many others.

<sup>6</sup> Under the Government imposed 'presumption for sustainable development' which is probably the most misleading name for a planning policy anywhere in the developed world.

<sup>7</sup> Email from Leader/Chief Planner – May 2019

<sup>8</sup> In northern Europe the minimum is a tram line, often several routes. Cambridge North it is supported by a new railway station and a segregated, high quality busway.

- Because densities are higher, then if the Peel Hall area in general was considered suitable, only part of the site would need to be developed.
- Currently 1,200 houses are proposed across 60 hectares in a low-density sprawl. Compact City could cluster the same number of homes around a public transport hub (probably near the A49) on around 12 ha, leaving 50 ha for a permanent country park or other use.
- So, the Compact City approach would neither inevitably lead to all of Peel Hall being developed or even developed for housing at all. **The Council's threat is an empty one.**

**The Council has never looked at what a Compact City approach means for Warrington overall.** Other areas in England are exploring the possibilities. **We think Warrington should too.**

The legal advice that the Council has sought but has kept secret from residents apparently suggests that if Peel Hall is not allocated the plan would be found 'unsound'. Legal advice depends entirely on which question is asked (the Council have also kept this secret) and who is asking it. This advice is bound to become public at some stage, and **to keep it secret goes against the concept of democracy, openness and partnership and reflects badly on those who took that decision.** Local communities do not have the resources to seek their own QCs advice.

We suspect that the advice took the proposed continued low-density expansion of the built-up area of Warrington as a given. But this is not the only development model available. **If Compact City was given serious consideration, then legal advice could look very different.**

## 5.5 Peel Hall - alternative uses

Peel Hall is an important green lung for the north of Warrington. To waste it with low-density housing would ensure it would never be a green space again. Warrington faces an unprecedented period of change, including the potential need for a new hospital close to the urban area. Alternative uses we would like to see explored include:

- Country park (with associated leisure) that would allow residents new and old to connect with green spaces and the countryside and to improve their health.
- New hospital – the existing site is cramped and very close to the town centre. It would be ideal for redevelopment as a higher-density urban quarter which would regenerate Warrington Town Centre. Wasting Peel Hall for low-density housing, forces any new Hospital onto the Green Belt and would itself be road-dependent and unsustainable.
- Higher density housing (12ha @100 dph) on the western part of the site that could be served by a quality rapid transit system on the A49. 80% of Peel Hall could be a country park.

We do not endorse any of these options, but all are more sustainable and a better use of land than the current proposal. We feel the Borough should join with the local community in exploring the best use of the site – this is what town planning should be – not a top-down imposition.

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.

## 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 provided and a much higher standard of public transport supported with lower subsidy and cheaper fares. Car dependency, noise and severance is reduced and air quality improved. Space that would have been occupied by roads and parked cars is reduced and more land available for people.

The town centre and surrounding area meets these criteria. We understand that the Council have reviewed urban capacity in the town centre. We still believe that the allocations for commercial uses and retail are too optimistic. Since the PDO, the retail sector has collapsed further and there are more retail voids. Although there have been some housing 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.

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 an 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. To 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.

The Western Link and other highway capacity improvements take a high proportion of the potential transport funding for Warrington. 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 quality<sup>9</sup> 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 References, abbreviations and acronyms

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

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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

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<sup>9</sup> Defined as tram or segregated busway; most northern European cities would not consider a busway to be ‘high quality’. Some would not consider a street-running tram ‘high quality’ either.