



Objections to Warrington Borough Council Preferred Development Options.

The justification for Warrington Borough Council's new plan is built upon two concepts. The first is that Warrington has seen a lot of business development, therefore it will need the same amount and more in the future. The second is that those businesses need employees, who will in turn need homes. The council has used the government's encouragement for development and affordable housing to justify an extraordinary departure from sensible planning. It is hard to know how its own financial ambitions and relationships with a number of interested businesses are affecting its decisions. Certainly the suggestion that if Warrington didn't choose one of these options the government would impose a harsher target on us has been proved to be untrue.

The Business Case

The Economic Needs Assessment, produced in conjunction with a business partner of WBC, The BE Group Ltd, (Warrington & Co (Regeneration) Ltd) is more of a sales document than a serious assessment of needs. It views Warrington's neighbours as competition and the use of land for business in the other towns as lost opportunities, not as an overall benefit to the region. The Duty To Co-operate has been turned into the Duty To Compete.

A key flaw in the document is its **failure to consider the impacts of certain foreseeable events, such as the EU Referendum vote and not getting an HS2 station**. These events must be assessed properly and major new decisions should be put on hold in the interim. The effects are not theoretical and can already be observed. The short and long term effects should be examined.

The document uses the statistics from the **OMEGA** business park as evidence of future demand, despite it being a **non-typical development**, both in the Warrington area historically and nationally. It includes what could be described as hyper warehousing, which needs very large plots. Obviously there are few areas in the right locations that can or will release this amount of land, especially for what amounts to low employment per m² and is essentially single storey development. Businesses that want/need such opportunities will jump at them where the opportunity becomes available. This is low value for investment with **Warrington's most scarce resource – land**.

In the case of the south Warrington's development proposed for the M6/M56 junction, the land is owned or under option by at least one large partnership between external businesses and **Langtree Property Partners Limited, itself in partnership with WBC (Warrington & Co (Regeneration) Ltd, Wire Regeneration Ltd)**. Several large Greenbelt sites are owned by Langtree and there would be significant benefit to all those concerned if the Greenbelt designation was removed. Does this represent a **conflict of interests**? The situation is not presented to the public with any clarity.

Warrington has signalled that it will not protect its Greenbelt, which has resulted in much of the available land being purchased by companies, speculating that they will get planning permission now or at some foreseeable point in the future. To freely give in to them, represents a substantial financial gain at the expense of residents. It is doubtful that Warrington will get much in return for such generosity. If there is a return in kind or of a monetary value, that needs to be spelled out.

The report states that Warrington should 'protect its employment sites from non-employment uses, such as housing or retail.' Which is unacceptable because that forces the area to prioritise business over housing. That then allows more justification for building property and local amenities on Greenbelt land. In other words business first, then people and the environment last. The opposite of providing affordable housing in a sustainable way and **only releasing Greenbelt in exceptional circumstances**. It also separates homes and jobs, forcing longer commuting.

Apart from OMEGA, the demand for business sites was much slower over the last 20 years and while there may be other businesses looking for hyper warehouses, Warrington shouldn't destroy its greenbelt simply because there are businesses lobbying WBC or if Warrington has a financial incentive in the decision.

The planners need to **assess the economic benefit per m² released and not just the overall benefit. Business taxation needs to reflect the rarity of very large plots of land and how valuable they are to large businesses.**

The development of automation might significantly affect the local economic situation, leading to job losses without releasing land back for alternative employment. **The employment capacity per m² should also be calculated including logical employment changes.**

Warrington, as a New Town has seen its early developments mature and even age. The report recognises that some of the business areas are no longer suitable or attractive. It also reports that businesses are reluctant to release properties or parts thereof they no longer use. WBC needs to review this and consider redeveloping what are now brown field sites, forcing businesses to vacate or move to other locations if necessary. **Warrington actively targets unoccupied domestic properties, it must do the same for business developments.**

Warrington has followed a policy of large boulevards, verges, bushes and car parks around business developments. While attractive, this has resulted in very poor land use. Much of the development has been low rise. **Warrington must stop developing as if there was no shortage of land.** Office blocks need to start going **up, not out**. Car parks need to be smaller and/or multi storey. Shared car parks should also be considered. Where land is owned, **planning permission must include sharing with other businesses if the owner cannot guarantee full occupancy and efficient use of the space.**

Warrington the City

WBC's ambitions to be a city are doomed to failure under the current prospectus. Many businesses and properties do not turn a town into a city, no matter how many people arrive. Warrington has little to recommend it. It came dead last out of 325 places in the

Royal Society of Arts' Heritage Index. The top 10 attractions are the town hall gates, the town hall, the Alice in Wonderland Tea Party statue and the River of Light. That's not 10 items but that's all that were listed. **Warrington's only real appeal is that it's not an urban and industrial hole like the towns round it. Does the council want to kill what little attraction Warrington has got?**

Warrington should be **concentrating on the city centre and high value business development**. It should be creating spaces for the qualified young to buy their first flat and spend their time in town. At the moment it only attracts students to come and drink themselves into oblivion. There is very little to attract grownups but much to put them off.

Warrington's town centre has a mixed level of success for retail within the centre. The original Time Square development was only built in the 1980s but was the poor relation to the Golden Square. It remains to be seen if the new Time Square draws in more people or just shifts the focus from Golden Square. However **the real competition comes from the many out of town retail developments** as illustrated by M&S deciding to close its central shop. **The NPPF, stresses that development shouldn't marginalize the original town centre. A new suburb in the south will be yet another lure away from the town proper. The town centre will be a periphery to those who live there.**

The Roads and Bridges

It is widely accepted that the routes into the centre from the south are congested and quite poor. The swing bridges are a pinch point and when in use by shipping, a barrier. It seems likely that Peel, are pushing the council to shut the bridges and replace all traffic on high level bridges. The western link seems inevitable but **a second bridge on the east should not have been tacked onto the current plan**. There is no paperwork to justify any such radical change or to explain the options. The proposed line cuts through the Trans Pennine Trail, many affordable houses and greenbelt. It severely blights the properties along the route and WBC hasn't even investigated what **would be involved removing the legacy rail infrastructure, how much it would cost or what effects it would have.**

In part, the new road route seems to be to quarter off more land from the countryside and thus destroy the greenbelt justification. It's noted that **Langtree Property Partners Limited** own or have an option on parts of the strategic route. **Building a road or housing along this line could be seen as a deliberate action to justify the enclosed areas being in-filled, because of the resulting poor Greenbelt contribution of the land.**

The network of roads joining motorway junctions and feeding into the town centre are highly flawed due to the routes chosen. They will undoubtedly act **as rat runs off the motorways at time of congestion**. Sat Navs and vehicle automation may even encourage traffic to cut off corners of the motorway network, bringing long distance traffic through urban roads unnecessarily. **The road will still converge with Warrington's worst area for congestion, the town centre itself and specifically Bridge Foot.**

The proposal of a new **high level route will not help in times of high winds**, a reason for the M6 to be shut to high sided vehicles. Presumably a new bridge would be subject to the same restrictions. **Warrington needs to press the highways agency to find a solution to the problems on the Thelwall viaduct.** New techniques in baffles and contra

flow management mean the two bridges could be open all the time, albeit with restrictions.

The creation of a new road, a new bridge and raised decks into town would **subject more people to pollution** and impact upon existing affordable housing. **Warrington is already very high on the list of polluted areas, 5th greatest CO2 per capita** (out of 63 as compiled by the Centre of Cities). It has one of the highest rates of car ownership per person in the country. It came 63rd out of 63 towns for people commuting by foot. 60th for commuting by public transport but 6th highest for commuting by car. **The car centric nature of Warrington and the morning and evening commute were recognised as problems in the 2014 plan. Nothing has been done to address that** and in the economic needs assessment it seemed to be viewed as a positive that people rush out of Warrington to Manchester and Liverpool, while other people rush into Warrington from places like Widnes and Runcorn.

New housing in the areas off the motorways and new road networks will make things even worse. **The greenbelt areas offer some buffer against pollution** from the motorways. Unlike some other cities, Warrington couldn't realistically reduce pollution with a congestion zone because **the motorways are such an integral part of the problem.**

There has been some suggestion that the strategic route along the old rail line might not be a public road but might be a bus route, a tram line or HS3. **The varied suggestions illustrate how poorly prepared this plan has been. The uncertainty has led the public to assume the worst.**

The planning process has been very poorly conducted and many people are still unaware about the plans, their scope and only the intervention of the public has allowed more people a chance to express their opinion.

Housing

The Adopted 2014 Plan was well reasoned and passed through the Planning Inspectorate which thought that the NPPF was being adhered to. It suggested a building rate for properties of 607dpa. It also approved a shared domestic/business programme that should have lasted 10 years but has been pushed through at high speed. **The speed reflects the hyper warehouse developments and not multiple businesses negotiating a large number of different developments. Some of the land designated for domestic property was absorbed into the business development land, leaving a housing shortfall.**

The 2014 plan recognised that **past rates of growth were due to the New Town designation and that the town was reaching maturity and that it couldn't sustain indefinite growth. What has changed?**

In the case of **Satnam Millennium Limited v Warrington Borough Council [2015] EWHC 370 (Admin)** the judge did **not** find wholly against the town plan. The challenge succeeded partly, because WBC didn't fully assess the need for affordable housing. Warrington's new plan goes well above and beyond that and **greatly exceeds the government White Paper outlining how councils should calculate housing based on affordability.** Under that calculation Warrington would be required to produce 870 dpa

but since the 2014 plan was fully adopted there was opportunity to add a cap bringing the figure down to **850 dpa**.

Warrington's new plan opens up a lot more land than could be justified as 'affordable housing'. The affordability values for Warrington are 6.06 and 5.89. Higher than 4, but **within the lowest 25% of other English towns and cities**. The high values 'needed' rely on projections of business growth that are based on the exceptional OMEGA development and some optimism on top of that.

Warrington was very slow to recover from the financial crash of 2009. New developments will be affected by Brexit uncertainty. This development plan alone will severely affect house prices in the area and given the substantial acquisition of land by developers, few areas will be free from taint. **If Warrington is prepared to build on a massive chunk of its remaining Greenbelt, it will build anywhere**. Who is going to invest in a more expensive property when it will be devalued in less than 10 years time by unconstrained development nearby? Warrington could easily see house prices fall.

The essential characteristics of Green Belts are their openness and their permanence. Warrington only designated lands as Greenbelt in 2006. Policy CS 5 - Overall Spatial Strategy - Green Belt - The Council will maintain the general extent of the Green Belt for as far as can be seen ahead and at least until 2032, in recognition of its purposes: Apparently not.

Infrastructure

The new plans outline that a lot of new infrastructure is essential. New schools, health centres, green spaces and roads. What seems to be **missing from the calculations are where the staff for these projects are going to come from?** Warrington already has infrastructure that it is having trouble being fully staffed and maintained. Health centres aren't short of doctor's rooms, they're short of doctors. There are plenty of green spaces and green corridors but a declining number of people to maintain them. Has the council costed the extra ancillary staff and resources for land that is currently maintained by farmers?

I'm assuming that that rent, council tax and even building development are part of WBC plans to bring in more money and that explains the desire to build heavily in places like Lymm, Grappenhall and Appleton, however the rate at which these areas are supposed to be developed might **damage existing council tax values for those areas**. As house prices will be affected by excessive development, so too will the justification for higher council taxes. The creation of 'executive' homes might be scuppered simply because those areas will **no longer have a cache, once they're sprawling estates with thousands of houses**. Those already driving long distances from Manchester and Liverpool in search of a 'nice area' might look elsewhere. I would. You would.

New schools will have no track record of excellence. Not necessarily a problem for those looking for affordable housing but a serious one for those Warrington hopes to attract as cash cows.

The proximity of the motorway to the proposed Garden Suburb will be a concern for many, especially those with children or respiratory problems. The addition of key roads through the developments would further weaken the attraction. **A-roads or those used as**

rat runs are often looked on less favourably than motorways. The ones WBC are proposing could be **busy night and day, especially with the proximity of the hyper warehouses** that are also part of the plan. They slice through walking routes to schools and shops. They will be at their busiest at rush hour, just as children are going to and from school and playing. In those periods where the Thelwall viaduct is closed, the areas will be **grid locked** as traffic looks for an alternative route. Just like existing routes are now.

Development in the 21st Century

As part of the massive building program, the council touches on new requirements for building but doesn't identify key areas that need new approaches. One of the main plans is the reduction of CO2. I doubt developers worry much if houses or even streets will need to be retrofitted in a decade or so but WBC needs to be guiding the future progress, especially if it intends to become a developer itself. The government, with the support of the opposition and other parties have signalled that they intend to cease the sale of new petrol and diesel cars from 2040 to meet the goals set under Climate Change Act 2008. What fewer people have noticed is that they expect to phase out gas boilers over the same period. These changes will require substantial upgrading to standard electricity networks both domestic and by area. **Ground source heating, under floor radiators, car chargers, commercial stations for rapid charging, etc need to be worked into the new estates. Developers won't supply these things unless WBC has a firm plan.**

Warrington council appears to be intending to borrow the money for a lot of this. It hopes to spend money to make money. If developers manage it, why not a town council? The problem is, developers walk away at the end. If there's a problem, they quickly shift money from one company to another, they change their name and they're gone. Alternatively they shrug off any problems or do the minimum to move on. A council can't do that. When the market's not right, the builders don't build. Does the WBC business plan allow them to do the same? What happens if Warrington goes bust?

It's important that the vast amounts of land banked for future development aren't left fallow, to go to seed. **They need to be maintained and where the land is farmed, that should continue. Hedges and paths need to be kept fit for their original use.** Already some of the areas that are under threat of these plans have been neglected. Some of these areas may not be developed for decades if at all, especially if there is a serious economic downturn.

Warrington needs to seriously review it's business plan in light of Brexit, HS2, a downgrading of financial rating (Moody's just downgraded Warrington by 2 points because of risk taking) and potential interest rate rises threatened.

Key studies into wildlife, pollution, traffic flow, bridge options, utilities and health delivery seem to be missing. There is a chicken and egg approach. Without the agreement that housing and business will be built, there's no point in doing the studies but without the studies the projects can't be judged for feasibility. Historical behaviour suggests that once land is scheduled as building land, there is very little/nothing that will change its destination. Since assessment must be done before building, it might as well be done before the land is reclassified.

If WBC isn't intending to jump to the developers tune it needs to scale back its plans in line with what its citizens are more comfortable with. It mustn't make Warrington the sacrifice for George Osborne's Garden suburb and Northern Power House plans. It's worth noting that he is no longer an MP, let alone a member of the cabinet. WBC needs to seriously consider taking the planning case back to the high court and appeal, rather than deciding to become a housing developer in its own right.

To Conclude

I reject all of the plan options as WBC has not fulfilled its obligations under the NPPF.

- 1) Source a more realistic Economic Needs Assessment from a truly independent organisation without business connections to WBC or interested parties. It needs to quantify the benefits and disadvantages of hyper warehouse style developments and other land hungry schemes. It needs to present possibilities arising from major economic events as outlined above. It needs to consider the effects of over development, especially in the south.
- 2) Explain in full the council's financial interests in the plan and justify their ability to remain impartial when considering planning policy. Justify economic risk taking.
- 3) Complete proper assessments of environmental impact on the areas they intend to take out of Greenbelt. Likewise they need to fully assess the traffic impacts, especially in respect of the new Garden Suburb, the increase in population and the new business estates planned. Either properly report on the options for an eastern bridge or remove it from the plan and the land set aside for it, including the section from the A50 to Waste Lane. Create a plan for known future needs in utilities and make them part of the conditional planning process. Calculate increased pressures on council costs with extended suburbs and population.
- 4) Justify the concept of a Garden Suburb at all, putting so much development in one area. Since it stretches from Appleton to the Trans Pennine Trail, it amounts to very much more development than the policy was meant to encourage.
- 5) Create a plan that looks further than 20 years. Work out when expansion outwards should stop or if the plan is to pave over every scrap of land that can support some form of development. Clearly greenbelt means nothing to the current plan. If Warrington wants to be a city, it needs to start acting like one. Look at London and decide which area we should be emulating. The most desirable or the least. Build upwards in the centre.
- 6) Properly inform the residents of major changes. This consultation is extremely poor and does not meet requirements.
- 7) Keep to the adopted 2014 plan until these problems are resolved. **DO NOT START THE NEW PLAN BEFORE IT IS ADOPTED.** At most, comply with the government white paper on housing provision based on the 2014 plan and create nothing longer than a 10 year plan to allow new data from recent events to be collected.

