

# WBC Local Plan Sep 2021 Updated Proposed Submission Version 2021–38

**‘We are at a unique stage in our history. Never have we had such an awareness of what we are doing to the planet, and never have we had the power to do something about that. The future of humanity and indeed, all life on earth, now depends on us.’**

**‘Young people: They care. They know that this is the world that they're going to grow up in, that they're going to spend the rest of their lives in. But I think it's more idealistic than that. They actually believe that humanity, human species, has no right to destroy and despoil regardless.’**

— David Attenborough

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## 1 Introduction to dinosaurs

This response has been developed and agreed by **Culcheth and Glazebury** and **Croft Parish Councils** as their response to the Local Plan Updated Proposed Submission Version issued in September 2021.

We are pleased and want to give credit to the Council for taking on board many of the concerns of the Parish Councils and others raised in response to the previous proposed submission version – changes Council officers at the time in 2019 insisted were impossible, including:

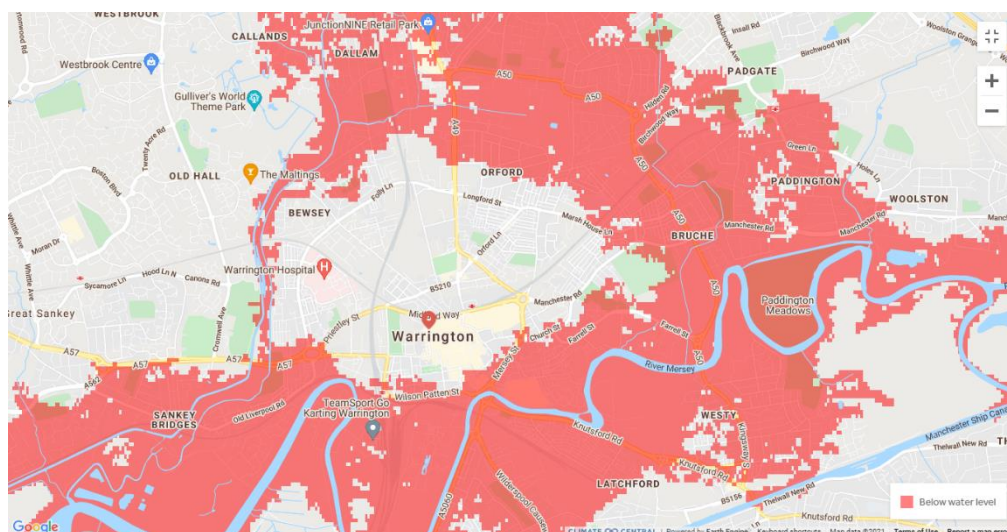
- Reduction in housing requirement.
- Allocation of Fiddlers Ferry site for employment and housing.
- Removal of some of the Green Belt allocation sites.

However, we think the Council could and should go further. The world has moved on since 2019. The **climate change and the environmental crises have deepened**. We are also in an **obesity crisis** largely fed by car-dependency and lack of active travel that is overwhelming our communities. Yet **the Local Plan increasingly resembles a dinosaur** – based almost solely on 1960s principles of car transport, still promoting largely dispersed, unsustainable, low-density housing. The Plan still proposes significant releases of Green Belt land supported by new road building of a sort common in the 1960s, but now widely recognised as unsustainable.

After our submission in June 2019, the Council declared a **Climate Change Emergency** and then declared an **ecological emergency** in 2020. The updated plan shows no evidence these ‘emergencies’ have influenced its preparation and it does not even define ‘**sustainable development**’ – an unforgivable omission.

But we are in climate change, environmental and obesity crises. **We cannot just repeat the same old pattern of development that created these crises**. This response was developed while world leaders gathered at COP26 in Glasgow – we must follow their lead and create a sustainable Warrington.

Warrington could lead the field. We could use best practice and develop 15-minute neighbourhoods to create a pattern of development that stops urban sprawl, reconnects people to their communities, provides a fairer society and shows the way for others to tackle climate change and biodiversity. We would like to help the Borough Council to develop that shared vision.



For these reasons, we believe the plan is not justified or effective and is currently unsound.

*1 Climate change may not be good for Warrington*

## 2 Summary – could do better

While the updated Proposed Submission Version contains welcome changes to reduce the plan period, housing numbers and Green Belt development it still recommends significant releases of Green Belt land for low density housing supported by new road building. Climate change, health and environmental considerations barely register. This response was compiled during COP26 in Glasgow – but where is the commitment to future generations or the Council’s own ‘climate emergency’?

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.

**Specific improvements we would like to see before the Plan can be considered ‘sound’ include:**

- Reduction in the housing allocations in the 2019 plan from 18 to 17 years; the plan should be adopted mid-2023, giving 2021/2 and 2022/23 before adoption and then a clear 15 year housing allocation after adoption as required by Government.
- A normal 5% ‘flexibility’ allowance should be used - 10% has not been justified by the plan.
- Reassessment of urban capacity should take account of post-Covid realities that more major sites will become available during the plan period.
- Reassessment of building density requirements in urban areas outside the town centre.
- Full and fully independent review of the climate change implications of the plan.

**17 years x 816 x 5% ‘flexibility’ would mean sites for 14,565 homes needed**

**The Council state that 11,745 urban capacity is currently identified.**

**Further urban capacity will become available during the 15-year plan period – we have assessed this as around 4,000 homes, for instance from the hospital site, Padgate Campus, Bank Quay, and further retail decline, meaning 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 not been made for the ‘exceptional circumstances’ required by national guidance for Green Belt boundary alterations. **Sites OS1 and OS2 should be deleted.**

We welcome higher required densities in the centre of Warrington. But apart from the town centre density (50 to 130dph) these are still too low (30dph) to create sustainable neighbourhoods, and best practice is to specify habitable rooms per hectare and type (flat or house), which is not done in this plan. The current proposal could result in small, inflexible flats that provide poor living conditions and slums for the future.

**Outside the town centre, the plan should adopt a minimum housing density standard of 50 dph for houses and 70 dph for apartments.** Additional standards based on habitable rooms per hectare should also be designated.

The **Unilever and other sites around Bank Quay** will become available within the plan period. Yet this is excluded from the plan, a negation of planning. This **should be considered within the plan**

We remain concerned at the lack of integration between land use and transport planning. Local Transport Plan 4 (LTP4) was adopted in 2019, but progress has only been made is on schemes that increase road capacity, which points to the unsustainable nature of the local plan. Progress on walking and cycling has been glacial, the ‘First and Last Mile Transport Masterplan’ is unambitious – certainly not a masterplan, and there has been no progress on a transit system that is desperately needed to replace the bus network where patronage is imploding.

### 3 Housing numbers and plan period

We welcome the abandonment of the unrealistic 2019 local plan housing targets and the reduction of plan period to 18 years, although we see no reason why it should not be 17. Contrary to the assertion in the plan, there is no evidence that new housing makes homes more affordable: new house prices are always related to existing prices in the area. The updated plan envisages an allocation of 16,157 new homes (average 816 per year, plus 10% contingency) for the 18 years from April 2021 with significant green field and Green Belt allocations. Allocated Green Belt or greenfield sites will inevitably be developed ahead of urban areas, so these should be minimised.

Our submission in this area relates to:

- Government policy and statements on Green Belt and green field development
- What is the right ‘flexibility’ allowance?
- Plan period and nature of allocations
- What is the correct ‘urban capacity figure?’
- Summary

#### 3.1 Government Policy

National Government policy suggests that Green Belt boundaries should only be altered in ‘exceptional circumstances’. This is a very high bar and requires an exceptional level of proof – not just that the Council has run out of easily developed green field, non-Green Belt sites.

At his party conference in October 2021, the Prime Minister both signalled a major change in planning policy when he stated: ***‘Not on green fields, ... but beautiful homes on brownfield sites in places where homes make sense’***. This statement from the Prime Minister must be taken seriously as a statement of intent on future policy.

Stockport MBC – an area with similar challenges and opportunities to Warrington stated that it will create a draft local plan with no further Green Belt encroachment. While this approach may have risks, it is a clear signal that some local authorities are prepared to ensure that Green Belt boundaries are permanent.

### 3.2 What is the right ‘flexibility’ allowance?

The standard allowance is 5% to allow for the possibility some sites may not come forward, but in the face of previous developer demands, the Council has unilaterally arbitrarily increased the allowance to 10%. As we have previously stated, Warrington can hardly be objectively accused of under-delivery. Despite recent slowing of growth, in just 50 years<sup>1</sup> New Town development has doubled the population and extent of the town.

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 Plan period and nature of allocations

We accept that the plan needs to cover 15 years and that it needs to allocate sites for the two years that it is under preparation (2021/22 and 2022/23). However this makes 17 years rather than the 18 years proposed by the borough. We see no reason why the plan should be 18 years, as the last year will be – well – in 18 years when uncertainty will be very high and the benefits of planning minimal. At this point it is highly likely that new large sites will become available in a way that could not be predicted in 2021. The world may even have tackled climate change.

NPPF Para 65 suggests planning policies should identify a supply of:

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

This makes it clear than day that specific 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.

This Government recommended approach has not been followed by the updated draft plan. Policy DEV1 only includes ‘deliverable’ houses as outlined in the SHLAA, not ‘developable’ sites that are likely to become available (as NPPF suggests for years 6-10), and not potentially developable sites as outlined in NPPF as acceptable for years 11-15,

It is obvious from significant sites that have become available and developed in the last five years (large parts of the town centre and Fiddlers Ferry) that there is the potential to for other sites to become available. These would include

- Warrington Hospital – it is likely that this will be relocated within the plan period, leaving a large site that could form part of an accessible 15-minute community with excellent access to the town centre.
- Unilever site and Bank Quay area. Some development is already happening around Bank Quay. Close to the town centre and with excellent rail links this would form an ideal higher density (100dph) urban community. It is understood that part of the Unilever is not currently available. However there is good reason to believe that at least a significant part or all of the site will become available. This is exactly the area where positive planning would identify the potential of the site to deliver homes and a sustainable community, and would make a broad allocation for years 11-15. The assumed attitude of a current owner

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<sup>1</sup> Warrington was designated as a New Town on 26 April 1968.

ten years from now should not dictate what is best for Warrington. This is an abdication of positive planning.

- Padgate Campus. We understand that this is likely to become available for redevelopment almost immediately as the college relocates to the town centre
- Further town centre retail contraction is inevitable. While Warrington Collegiate may take up some sites, this also offers the opportunity of mixed uses including student residences.

Two years ago (2019), the Council stated that *'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.'*

Now, in 2021 a masterplan (albeit flawed) has already been created for residential development. Apart from demonstrating how wrong the Council was in 2019 to abandon any pretence of positive planning for the site – indeed we called Fiddlers Ferry the 'the elephant in the room'. This is the reason why NPPG suggests that broad locations for growth, are needed for years 11-15 of the Local Plan. This is exactly the circumstances where Warrington can be certain that large, sustainable, town centre sites will become available and where it is appropriate to specify only the 'broad location' envisaged by national planning guidance.

In 2021 the Council are using the same words to justify excluding the Unilever site. They are likely to be wrong in the same way again.

Many demographic and other 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.

There is a further consideration. The October 2021 draft Greater Manchester 'Places for Everyone' (the successor to the draft GM Strategic Framework) focusses new homes within 800m of public transport hubs and aims for no net increase in private vehicle journeys.

We see no reason why, with similar demographics and the abundant land available in the town centre and near transport hubs that this local plan envisages ever increasing private vehicle mileage facilitated by major new roads and larger junction. It's as if the Climate Crisis didn't exist.

This plan is unsound, and should aim for no net

### 3.4 What is the correct 'urban capacity' figure??

In 2019 urban capacity was reported as 13,726. The current figure based on SHLAA is 11,785.

However SHLAA has criteria based on deliverability rather than theoretical developability and is not a good guide to what the real urban capacity is, particularly from sites that will be released by trends (such as the movement of heavy industry out of the town centre, or continued retail contraction) where exact site opportunities are hard to pinpoint. Our assessment is that these will release well-located land for at least 4,000 homes in sustainable locations, although the figure could be much higher. This is enough to remove the need to change Green Belt boundaries in this plan period.

### 3.5 Summary

We believe that:

- While we are pleased that the Council have accepted that it was wrong to have a plan period of 20 years, we think it is right and logical that it should **cover 17 years** – in other words 15 years from adoption as suggested by Government.
- A 5% contingency is justified.
- **Specific housing allocations** need only be made for the **first ten years** in line with NPPG
- **The council should allocate broad areas for development in years 11-15**
- The urban capacity assumptions should be **updated to represent almost certain availability of large, sustainable town centre sites**. Remember how wrong the Council was about Fiddlers Ferry – less than two years ago. Humility is needed.
- Adoption of these simple changes would allow Green Belt boundaries to stay intact for the whole plan period, as indeed was envisaged by the 2014 Core Strategy.

	WBC 2019	2019 Parish Council Suggested modification	WBC 2019	2021 Parish Council Suggested modification
Annual target	945	909	816	816
Plan period target	18,900 (2017 to 2037 – 20 years)	13,635 (15 years)	14,688 (18 years 2021-2038)	13,872 (17 years 2021-2037)
Flexibility allowance	1,890 (10%)	682 (5%)	10%	693 (5%) or 1,386 (10%)
Total Requirement	20,790	14,317	16,157	14,565 Or 15,259 (10%)
Stated urban Capacity	13,726	13,726	11,785	15,000 within plan period
Green Belt Requirement	7,064 (1,210 ha)	Negligible	4,372 (580 ha)	Negligible
Fiddlers Ferry	Not included	Should be included as major opportunity	Now included (1,310 in plan period)	1,310
Other major brownfield sites	Not included		0	c.4,000 (see text)

## 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. 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. Landowners and developers attack it as Green Belt development produces huge windfall profits.

The Local Plan Core Strategy July 2014 emphasised a regeneration first strategy and recognised that Warrington was both nearing its natural limits to expansion and that New Town development provided few benefits for the established urban areas. It saw no need to release Green Belt land.

Our submission in this area relates to:

- Support that most Green Belt development proposed by developers is rejected
- Objection to allocations OS1 and OS2
- Protection of valuable agricultural land, including to ensure UK food security
- Exceptional circumstances for Green Belt release

#### 4.1 Rejection of most proposed Green Belt development

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 object to Green Belt allocations OS1/2 at Croft and Culcheth, and have concerns about the allocation at Peel Hall.

#### 4.2 Objection to allocations OS1 (Croft) and OS2 (Culcheth)

The Council suggests that *'Green Belt release in the outlying Settlements will increase housing choice and support the vitality and viability of local services.'* No evidence is provided that 1,100 houses are needed in these communities - this is a random figure. Indeed, some communities are deemed substantial allocations, some no additional housing at all, and one allocation to the north of Warrington (Burtonwood) has been arbitrarily deleted since the 2019 version without justification.

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 more market housing makes homes generally more affordable. Older and younger people who wish to remain within our communities need housing, and there is a case for truly affordable housing (not the current central Government definition). But these needs are not served by the proposed allocations OS1 and OS2 which would be built as speculative housing and attract car commuters. Our objections to the allocated sites are as follows:

##### **OS1 (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 poor service) so even rail travel would generate traffic. Local roads are busy and almost all trips from or to OS1 would 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 understand the developer would be Bellway Homes, a national volume builder specialising in market housing and standard designs with little variation or concession to local styles. They would build as much standard 3 or 4 bed houses as possible to maximise profits and use the viability assessment method to challenge 'affordable' housing provision. **We think this allocation is unsound because the site makes a major contribution to Green Belt purposes.** The proposed allocation **would neither increase housing choice nor support the vitality and viability of local services.**

##### **OS2 (Culcheth) 'minimum of 200 homes' – parcel CH9**

This site is also promoted by a volume builder - Story Homes. Like the Croft site (OS1), this speculative development would attract additional car commuters that would add little to the village



and would not increase housing choice or support the vitality and viability of local services. The developer has previously said the development *'could be extended further east to accommodate a significantly larger site than proposed, approximately 400-500 dwellings.'* This shows that that this development would lead to further encroachment into the countryside, against Green Belt aims.

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. Denser development would mean less land released and would be more suited to the identified need for provision of homes for younger and older people.

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 think this allocation is unsound because the site makes a major contribution to Green Belt purposes and that no evidence has been provided to suggest that the proposed allocation would increase housing choice or support the vitality and viability of local services.**

In 2019 we suggested an alternative way of providing housing for genuine local need, for instance 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 provider, or a Community Land Trust) that is available in perpetuity. While no such assessment at Parish level has been carried out, such a need could arise – and would constitute the 'very exceptional circumstances' needed to approve an application in the Green Belt. This means it would be possible to retain the current Green Belt boundary.

Should OS1 or OS2 be approved as part of the plan, we wish to see the policy reworded to include:

- **Before OS1 or OS2 is developed, a local housing need assessment will be carried out in collaboration with the local community and Parish Council and any housing approved should directly meet the identified needs of the local community. Any 'affordable housing' should be affordable in perpetuity.**

#### 4.3 Protection of valuable agricultural land

Almost all the land proposed for removal from the Green Belt is the best and most versatile agricultural land which is crucial with the need for the UK to produce more of its own food. Based on the farm-gate value of unprocessed food in 2019, the UK supplied only just over half (55%) of the food consumed in the UK<sup>2</sup>.

The plan claims that the value of agricultural land was a consideration in the options assessment and sustainability appraisal process. However, there is no explanation how this affected or changed any

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<sup>2</sup> [Food Statistics in your pocket: Global and UK supply - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414242/food-statistics-in-your-pocket-global-and-uk-supply-2019.pdf)

of the assessments. 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.

#### 4.4 Exceptional Circumstances?

Does the assumed need for housing land constitute the ‘exceptional circumstances’ required to remove land from the Green Belt?

The current draft plan does not include an assessment of the consequences for sustainable development – indeed it does not even define sustainable development. The effect on urban regeneration of the availability of green field land for development is not assessed.

Overall the potential to reduce the need to allocate land by shortening the plan period further 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 Housing 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. Housing densities are the key factor in increasing sustainability and reducing energy use. If more people can be housed in the same area, then good shopping educational and leisure facilities become 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. The large-scale expenditure on new roads envisaged by the local plan would be unnecessary.

We acknowledge Warrington has made some progress since 2017, but more work is needed to define sustainable housing densities before the plan can be considered sound.

Densities can be measured in different ways. The local plan uses dwellings per hectare (dph) as a net figure so the gross, or actual amount of land needed is much larger when roads, public open space and other facilities are included. The Plan proposes minimum densities of 130dph in the central area, at least 50dph on sites that are within the wider Town Centre Masterplan area and sites adjacent to a district centre or in other locations that are well served by frequent bus or train services; elsewhere in the town centre masterplan area and 30dph for most other sites.

We welcome the minimum densities for the central area and the second tier at 50dph. However 30 dph is just the average for the standard volume-built suburban development which is so wasteful of land and energy and just continues ‘business as usual’ at a time when we need leadership to combat the climate emergency. 30dph was achieved for most of the New Town era – and led to the current widespread car dependency in Warrington that the revised draft plan claims to want to but fails woefully to tackle. We see no reason why this should not be higher to conserve land and create more sustainable communities.

In our 2019 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 is not new – it has been used successfully 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 such areas.

**The plan should retain the densities proposed for the town centre (130 dph) and masterplan area (50dph) but adopt a minimum housing density standard in all other areas 50 dph for houses and 70 dph for apartments.** Comparable standards for habitable rooms should be developed to avoid tiny flats.

## 6 Transport and Local Transport Plan 4 (LTP4)

The two Parish Council areas both suffer from too many vehicles. At normal times and especially during the frequent incidents on the Strategic Road Network, these communities suffer from congestion, noise, pollution, road danger and severance. Conditions for walking and cycling are hostile. Rail stations are remote and bus use has fallen off a cliff in the last five years with bus services essentially unviable as a form of public transport in this area.

Warrington has a recognised transport problem. Census 2011 figures show car ownership 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 Green Belt releases and Peel Hall development planned for north Warrington are all car-dependent and will lead to significant additional traffic problems.

The lack of integration between land-use and transport planning is the Achilles Heel of many local plans; most local UK transport planning is particularly weak in encouraging public transport, cycling, and walking or considering the crises in climate, biodiversity and poor health caused by lack of exercise. These faults are obvious in this plan too.

LTP4 was adopted in 2019 and promotes increased road capacity including four major road schemes safeguarded by Policy INF2 – but not a single firm, costed or safeguarded public transport or walking or cycling improvement. The use of the term ‘Multimodal Corridor’ for the Warrington East scheme is an abuse of English – this is simply another urban road. Policy INF2 is unsound and unsustainable.

Places for Everyone (the successor to the draft Greater Manchester Strategic Framework) focusses new homes within 800m of public transport hubs. Initiatives such as the [Rochdale \(Rail\) Corridor Strategy](#)<sup>3</sup> run by London Continental Railways (a Government property company) provide a viable implementation exemplar. We think Warrington could focus development on the Cheshire Lines rail corridor (Sankey, Warrington West and Central, Padgate and Birchwood) to unlock more housing in sustainable areas.

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<sup>3</sup> The Rochdale rail corridor strategy aims to unlock potential along the Calder Valley line. It has identified capacity for around 7,000 new homes within 800m of the five stations in Rochdale borough, 76 per cent of which will be on brownfield land. Around each station the intention is to invest in walking and cycling routes, park and ride, new public realm, and community spaces.

Cycling remains the mode with the greatest potential to reduce local congestion, improve health and boost the economy. There are some warm words, but neither local plan nor LTP4 provide detail or solid policy and there has been no progress on cycling schemes since LTP4 was adopted in 2019.

The wording of Policy INF1 – Sustainable Travel and Transport – is not sound – it will not lead end car dependency, and it will not encourage active travel modes. It contains the same policy wordings that have failed in the past. The plan should adopt the aspiration of Greater Manchester districts and aim for no net new journeys by private car.

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 in the UK. 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 before any substantial new sites are developed.

## 7 Peel Hall - Policy MD4

An appeal was allowed in November 2021 for 1,200 new homes on 69 hectares. It is ironic that this Decision Notice issued during COP26 will lead to 1,200 new gas boilers and 2,400 new car parking spaces. The site is not within the two Parish Council areas, but traffic generated and other demands on local infrastructure affect Croft, Culcheth and Glazebury. Given that a legal challenge could be launched, discharging conditions may take longer than the local plan approval process and the permission could lapse anyway, the local plan should continue to take a view on the form of development and to insist that the development is as sustainable as possible for a low-density spec-built suburban estate if built. The policy should insist:

- Public transport proposals should be linked to enforceable modal split targets – there has been a dramatic decline in bus use in Warrington, and conventional measures such as bus gates have failed to arrest this decline elsewhere in Warrington
- Production of a design guide; the development should encompass 15-minute community principles, be inclusive for older and young people (such as dementia-friendly) and encourage healthy lifestyles.
- It should be carbon neutral – we are running out of time to avoid catastrophic climate change.
- Walking and cycling routes should join up with and co-fund routes into Warrington centre.
- Any Travel Plan should include provision for monitoring, with targets that are backed up with a legally enforceable mechanism to ensure action is taken should targets not be met – particularly in car use and congestion.

Policy DEV5 would be a suitable point to examine the potential for 15-minute communities which would be based around these designated centres.

15-minute neighbourhoods are areas where people can meet their everyday needs within a short walk or cycle and do not need to travel more than 15 minutes to earn a living, buy food, see a doctor, or educate their children. They boost local economies, improve health and wellbeing, increase social connections, and tackle climate change. UK interest has grown since the COVID-19 pandemic.

## 8 Climate change and other crises

We criticised the Climate change policies and Sustainability Appraisals (SA) presented in 2017 and 2019, and with recent national developments and COP26 held in Glasgow, this submission draft looks increasingly like a dinosaur. Warrington seems oblivious to the crises that dispersed, low density housing development proposed in the plan would make worse:

- Climate change crisis – which the updated 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

Government policy has advanced since 2019. As well as the target to cut greenhouse gases to zero by 2050, There is a legal requirement to reduce emissions by 78% by 2035 compared to 1990 levels well within the proposed plan period. Much stronger local plan policies are required – for instance, Places for Everyone (strategic plan promoted by 9 GM districts) has a clear aim to **promote carbon neutrality of new development by 2028**. Warrington should adopt this aim. With a comparable demographic, to proceed with the currently weak policies will run the risk that the plan is found unsound.

End of document