



15/11/2021

## **Objections to Warrington Borough Proposed Submission Version of the Local Plan**

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 accept the town plan the government would impose a harsher target on us has been proved to be untrue. It appears that the current poor state of the council's investments and imminent repayments of borrowing are influencing a drive for quick and lucrative B2/B8 developments on Greenbelt green field land to bring in much needed money to the council coffers. Similarly the council has chosen green field, Green belt land for housing as that also offers a swifter delivery of Council tax income. Harder to develop, brown field land has been pushed back or ignored by the plan altogether. Or so it seems. The council's plans need forensic inspection by the Planning Inspectorate to get to the truth.

The council has a history of starting building even before the town plan has been approved, such that the land has been used up almost before the plan has been accepted. Requiring a new plan soon after. What is the point of the planning system?

### **The Business Case**

Refresh to the Economic Development Needs Assessment 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 demand to build as much as possible.

Notes on the Refresh to the Economic Development Needs Assessment.

Text in italics is a quote from the document.

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iii) This *growth in e-commerce has boosted an already strong logistics market*

If companies, logistics or otherwise were allowed to build on London's parks they would. It doesn't mean that they should. E-commerce cannot tear up rules for planning just because they are new and successful. Older businesses went

upwards when they needed more space and were penalised for doing so with higher taxes and running costs. E-commerce has benefited highly from lower taxes, cheaper land and fewer costly obstacles. But logistics is finite and much of the current activity is merely centralising activity in super sized sheds outside towns like Warrington while leaving smaller warehouses, distribution hubs and town centres dead with little drive to regenerate. The pandemic increased online shopping considerably but how much more expansion is likely in the near future? If town centre shopping is not to return the some of the council's recent investments are in big trouble.

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*iv) As in the 2016 and 2019, where growth locations are mentioned, South East Warrington is put forward to take advantage of the key M56/M6 links and provide strategic B2/B8 options.*

The council has been determined to build on this green field, green belt land, regardless of brown field sites around the town. In previous versions of the plan the planners ignored Fiddler's Ferry despite it being public knowledge of the date it was due to close. The argument has been that the site will take time to clear but since the plans have been for 18+ year periods it should have been included. The council has wanted to push ready to roll out sites. Why? Perhaps for a quick influx of money to town coffers?

*v) There is continued demand for strategic logistics units of 9,000- 35,000 sqm to compete in the regional/national market.*

There is demand but there is no demonstrable need. The employment justification is weak given that these land hogging businesses are ripe for automation which will see employment plummet. The businesses are not required to explore going down or reducing their footprint at all. A quick glance at any of Warrington's business and industrial estates demonstrates that they have built like we have land to spare. Even the town centre has single storey warehouse style businesses with large, mostly empty car parks.

*vi) in 2020/21, the Borough's office market saw some of its weakest recent performance.*

In relation to inflation the income from office rental has declined, demonstrating Warrington is not appealing to a mix of businesses and it is increasingly putting its economic eggs in B2/B8 warehousing.

The overall rent growth (all types of industrial and office) across the last 23-year period the average annual growth rate was 1.8 percent (page 39). The rate of inflation has been an average of 2.71% since 1998 which indicates that it's not growth at all. Industrial rents grew even slower, despite the high price commanded by B8 and rent per m<sup>2</sup> is worse than 2004.

*vii) with interest focused in Birchwood rather than Warrington Town Centre.*

Again, demonstrating that Warrington is not attractive to business and the town has done little to solve this while it can sell out of town, spacious locations.

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*viii) Of the strategic sites which may compete with Omega, and its successors, for B2/B8 requirements. Magnitude is the most significant existing site and Parkside is likely to be most significant in the future. Existing schemes in Cheshire and the Liverpool City Region, such as 3MG, Widnes, continue to grow. However, against the scale of potential needs from the growing Port of Liverpool, the programmed strategic supply in the Liverpool City Region remains modest, creating ongoing opportunities for sites in Warrington.*

The town is trying to compete for business from areas building on brown field sites and/or with rail freight connections. Given the prime motorway, Greenfield sites, it's highly possible that the town could lure businesses away from less convenient sites but they shouldn't. There is as yet no data on how the Port of Liverpool will expand and given current events, the expansion may be slow or short lived. The pandemic and Brexit will continue to affect trade in unpredictable ways. In the long term the massive amounts that this plan sets aside for B2/B8 may be necessary but the plan is premature and will just poach from other more sustainable areas. One area that might have been Warrington's own expansion of demand for jobs in a brown field location would have been Port Warrington. Now no longer any part of the plan for the next 18 years.

*ix) Sites in neighbouring local authority areas, even when of a strategic scale, will ultimately meet the OAN of those authorities rather than Warrington.*

Why does Warrington need this huge area of business land? The employment per m<sup>2</sup> of B2/B8 warehousing is very low and will be driven far lower by automation which is very much predicted. The only other reason is for rent and rates. This is I think key to Warrington council's eagerness to expand this sector. It has borrowed over a billion pounds in recent years and the return on investment ranges from modest to catastrophic. In the next 10 years alone, as far as I can work out, almost £400 million must be repaid, give or take new loans. I can't help thinking that these debts are influencing council decisions on planning and they are no longer a dispassionate body of people on the issues. The council has in turn loaned a significant amount of money to businesses in the area eg Warrington Borough Council loaned the billionaire owner of The Hut Group £151 million. It says that the arrangement is 'secured against assets'. Those assets might include The Hut Group's distribution centre in Warrington? Basically the council has become entangled too closely with those who want B2/B8. The Planning Inspectorate must consider if the plans are influenced by these things.

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*xi) and xiii) Since 2016, that supply has reduced by nearly two thirds, reflecting the extensive take up of land at Omega*

The council offered super prime sites and companies eagerly moved in. The planners allowed sprawling, inefficient use of land with easy access to the motorway. Just because businesses want those sorts of conditions, doesn't represent real need. It's astonishing how little attention has been given to maximising the use of our most scarce resource. Even the car parking for each

business is excessive with many empty spaces. There have been almost no attempts to share parking space between companies. Theoretically those parking spaces should be unnecessary as people use more public transport and cycle ways. Should future provision of land not even attempt to reduce this type of sprawl? Plans for 6:56 show the same style industrial estate model.

xiv) – xvii) These sections try to determine labour growth. They use years during which many B2/B8 businesses were built and occupied. This created a boom in jobs but only because the land was available and the council was amenable, very amenable. Such growth is unsustainable since there is a finite amount of land, especially land this convenient. If the land had been used for more, but smaller businesses as was intended in the 2014 plan then it would have taken the 10 years the plan was supposed to run for. In other words, exceptional land made available before is the excuse to offer even more exceptional quantities of land tomorrow. Is there an end point? When every cm of the area is built over? The government has expressed concern that Greenbelt is holding up development but at the rate we are going there will be buildings from Liverpool to Manchester and Warrington will be pointless. That's not levelling up, that's punishment.

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*xvii) However, the market assessment, the impacts of the Covid-19 Pandemic on jobs densities and a review of the historic trends in employment change and land take up (see Section 7.0 of the Main Report) suggest that these forecasts underestimate land needs significantly. The preferred forecasting method is therefore a projection forward of past take-up rates that considers both strategic and local needs.*

For the previous draft plans and this one, the council has ignored its expert assessments and chosen to super size the amount of land required for both business and homes, even while knowing that those expert assessments were already affected by excessive releases of land for B2/B8. This points to a different agenda to one that is supposed to supply Warrington's needs. The extra business is the excuse for more workers who will need more homes. Circular reasoning in the extreme.

## **Additional**

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 or optioned 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.

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 and employment benefit per m<sup>2</sup> released and not just the overall benefit**. Income to the council accounts must be separate from benefit to the people of Warrington.

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 m<sup>2</sup> 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 that 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**

Warrington'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.

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. Large areas of the town centre have been vacant for years, even decades and are only now being cleared and built upon. Other areas are replacing them where business has recently failed or moved to the outskirts. The real shortages are in first time properties, not executive homes.

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. 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. Plans for better access must precede massive house building.

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.**

### **Rail**

Unmentioned is the Northern Powerhouse Rail which the council has been lobbying for. If previous plans reflect the future then it is proposed as going over the heads of a large part of southern Warrington. That and HS2 will cut through what little real Greenbelt the town has.

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

### **Housing**

Warrington's new plan opens up a lot more land than could be justified as 'affordable housing'. The affordability values for Warrington upwards of 6. Higher than 4, but **within the lowest 25% of other English towns and cities.**

To bring down home values to what is 'affordable' homes would need to be under about £120,000. Few if any planned meet this criteria and all the homes proposed outside of the centre will be way above that figure, pushing affordability in the wrong direction.

## 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?

The proximity of the motorway to former 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.

## 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.
- 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. The Council's financial situation needs to be assessed in light of a need for quick return on building permission granted.
- 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 homes in the south east, the increase in population and the new business estates planned. Traffic improvements are not guaranteed and have historically been promised and then scrapped.
- 4) 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.

5) Investigate the town's trend of building before a plan is approved and how the time between plans has been eroded. **DO NOT START BUILDING TO THE NEW PLAN BEFORE IT IS ADOPTED.**

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