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To: [Local Plan](#)
Subject: Warrington Local Plan Consultation Feedback
Date: 17 June 2019 15:29:26

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I am providing the following consultation feedback to the Local Plan which I have tried to categorise although there are inevitable overlaps:

General:

The need for a Local Plan that facilitates and supports realistic, achievable economic and population projections for Warrington is clear. My feedback addresses the extent to which the Plan is realistic and achievable.

Housing

1. I have a specific interest in South Warrington where the housing target indicates 5000 new homes in a 'Garden Suburb' by 2037 with a possible further 2300 homes subsequently. The overall plan ambition for 945 dwellings per annum appears unrealistic given it is higher than anything that has been achieved in Warrington in the past.
2. Warrington Borough Council (WBC) has also chosen a 20 year plan period rather than the statutory minimum period of 15 years.
3. The combined result is a housing projection number considerably in excess of what is likely to be achievable.
4. A plan period of 15 years and a more realistic housing target would be appropriate to inform the Plan's assessment of Brownfield and Green Belt development scale.

Green Belt

1. The Plan needs to be challenged on whether it has maximised the development of Brownfield sites, both in extent and dwelling density, before assessing the extent and locations of Green Belt that is required.
2. The excessive housing projection is contributing to a higher release of new development land from the Green Belt than is likely to be needed. With that release largely in South Warrington that will result in a substantial transformation of the distinctive character of South Warrington from semi-rural to urban. Opportunistic and piece-meal development of land parcels across the extent of the released Green Belt land, coupled with actual delivery well below the Plan's ambitious target, will lead to an unsightly, poorly structured and poorly connected patch-work of housing developments across semi-rural land that no longer enhances the character and environment of South Warrington. There is a high risk of orphaned housing developments and 'roads to nowhere' being distributed across the landscape to the

south of Warrington.

3. It is not clear that the 'Very Special Circumstances' for Green Belt release has been clearly set-out and justified.
4. There is a risk that early designation and release of Green Belt will reduce Developer's interest in maximising exploitation of Brownfield sites at an early stage and this will be exacerbated by the designation of larger than necessary areas of Green Belt land as available for development during the Plan period.
5. It is not clear why the majority of Green Belt release is targeted in South Warrington.
6. A Green Belt release scaled to a more realistic housing target, with maximised Brownfield use, more equitably distributed across Warrington and over a 15 year plan period, should be applied setting out clearly the 'Very Special Circumstances' justifying the release.

Infrastructure

1. Substantial housing development is proposed for South Warrington and the Plan expects that this development will bring economic benefits to the town, including town centre regeneration. However there is little indication that this Plan is supported by infrastructure improvements that deal with even the current issues of travelling from South Warrington into the town centre and further northwards. These are: congested roads, just three Victorian swing bridges and a weight restricted high-level bridge relied upon for access across the Manchester Ship Canal. These will only be compounded with a substantially increased population in South Warrington over the Plan period. This appears to create several issues:
 - a. The South Warrington developments are remote from the existing railway stations serving the town. As a regular train user for many years in my last job, I am well aware that the road and public transport infrastructure from South Warrington, coupled with the limited parking capacity serving the stations, is not helpful to encouraging train use early in the morning or later in the evening.
 - b. New residents attracted to South Warrington will either add to the congestion by attempting to travel to the town centre, or choose to travel to other places for their leisure, shopping and work.
 - c. In both cases they will increase vehicle emissions and add to the issues of poor air quality either within Warrington itself, or more widely across the area.
 - d. New residents who choose to go elsewhere for their work, leisure and shopping will be placing an additional burden on WBC for Council funded Services but will not be contributing to an improvement in the Warrington economy and town centre regeneration.
2. The Plan needs to be supported by infrastructure proposals based on realistic, achievable housing growth figures distributed across Warrington in a way that better links to Warrington's work, leisure and shopping facilities.

Economy / Employment

1. The Green Belt land identified for release will largely be used for housing that will be beyond what local people can afford. As such it is likely to draw in new residents in higher paid jobs with straight-forward commutes that are found in Manchester and Liverpool. They are unlikely to find employment in the Warehousing / Logistics developments being proposed for South Warrington and are unlikely to be contributors to the local economy.
2. Warehousing and Logistics development is rife across the UK, is a large consumer of land, visually and environmentally very disruptive, and with very low employment density. It is predicated on assumptions that existing forms of haulage transport and product distribution will be maintained.
 - a. These assumptions appear to be questionable over the time-frame of this Plan given the carbon reduction and air quality improvement commitments and aspirations of the UK Government.
 - b. The designation of land adjacent to the M56 / M6 for this type of development appears to be highly speculative and is doing nothing to support the carbon and air quality agendas. It risks not being taken up, or being abandoned after a few years, both of which would leave South Warrington with blighted land and possibly large scale buildings and sites that will remain as future eye-sores.
 - c. The need for, and future sustainability of, Warehousing and Logistics developments needs to be tested.
 - d. Should the need for such developments be proven they must be designed and built in a way that minimises their visual impact, maximises their environmental sustainability, avoids creating additional burdens on the existing infrastructure and be readily 'de-constructable' in an environmentally sensitive way should they cease to be used. Ideally the owners of such sites should bear commitments to removal in the event they are no longer in use.

END