



Please find my response to the modifications of the Updated Proposed Submission Version Draft Local Plan.

I very much welcome the removal of the South East Warrington Employment Area (SEWEA) from the plan. At a time of Climate and Environmental Emergency we must not build on undeveloped Green Belt. **The major impact on amenity for the residents living very close to the proposals and the strong contribution to the Green Belt function mean that this development should never go ahead.** The proposed site also included Bradley Hall Moated Site Ancient Monument. Additionally we are seeing a massive reduction in wildlife due to loss of habitats. We must not release Green Belt so developers can make a quick profit - we must utilise the abandoned buildings in Warrington for development and regeneration.

1 Houses to be built on Green Belt

1.1 Importantly, the removal of the SEWEA cannot be taken in isolation and brings into question the rationale for the South East Warrington Urban Expansion (SEWUE) as the houses were meant to be for jobs created in the employment area. In the Vision and Spatial Strategy Para 3.2.3 the number of houses to be built on Green Belt land has been modified from 4500 to 4400. I object to this modification as the modified figure should be 0 as there is sufficient brownfield to meet a realistic, achievable supply of house on brownfield sites so the 'exceptional circumstances' for changing Green Belt boundaries required by the NPPF is not met.

1.2 Housing Delivery - **14688 units (816 per year) - this has remained unchanged despite vastly reducing the amount of economic land.** The housing target of 816 units a year is undeliverable as evidenced by ONS data. Completions in Warrington from 09/10 to 21/22 were: 340,-,430,640,590,580,590,430,260,360,510,520,710

The average for the 13 years is 458 which is almost half the figure proposed showing how unrealistic and undeliverable a figure of 816 is.

As there is brownfield for 10700 houses with 3000 more beyond the plan, this together with land coming forward over the plan period from regeneration, is sufficient to provide deliverable housing for the length of the plan. There are no 'exceptional circumstances' for Green Belt release.

1.3 Given the current recession and gloomy outlook due to wars and Climate Change the OE prediction of even only 490 jobs created per year looks overly optimistic. Housing supply and jobs created were shown as being roughly equal, so proceeding with a housing figure of around 450, which is deliverable and would remove the need for any loss of Green Belt would meet the needs of the area.

1.4 The government have now said that Councils no longer need to maintain a five-year housing supply. The lack of 5 year supply was previously used to justify using Green Belt land when there is a supply of brownfield sites in Warrington, but the brownfield could not be developed within the five years because it is easier and cheaper for developers to destroy fields than demolish old buildings.

Councils no longer need to plan for a 20% housing buffer.

More importantly, National housing targets are now 'advisory' not 'mandatory'. Many other local authorities have paused local plans. Warrington must not have an unachievable, damaging housing target imposed which involves releasing land from Green Belt. **As Homes England owns the land for the SEWUE this should now be withdrawn in line with government and local MP promises to protect the Green Belt as the case for 'exceptional circumstances' is not met.**

1.5 The homes planned for the Waterfont are not being counted because of the uncertainty of funding for the necessary infrastructure ( Western Link). There are no planned improvements to the log-jammed roads in SE Warrington to cope with 4200 houses in the SEWUE. Contributions from the SEWEA were meant to go towards Junction 20 M6 improvements alongside contributions from the SEWUE - the developers of the latter will not want to meet the £18 000 000 cost on their own. As the infrastructure cannot cope currently and no improvements are planned, the houses in the SEWUE must not be built as there is a lack of funding for infrastructure. See also 1.5.

1.5 The document UPSVLP 0432 on the Warrington Council website lists responses from developers linked to the land bought by Homes England. As usual it appears that the developers are trying to minimise the amenities that such a large development requires - schools, recycling centres, etc which has happened time after time, creating car dependent neighbourhoods which worsen travel and access to facilities for existing residents. It also appears to be suggesting that houses are built before local infrastructure is delivered and demanding evidence for contributions to surrounding infrastructure. As such, this development must not go ahead as funding is not secured for necessary infrastructure improvements on the surrounding roads.

1.6 As the SEWUE was meant to be housing for jobs in the SEWEA, if the houses are still built, residents would have to commute to jobs therefore adding to the traffic problems and air and noise pollution.

**An undeliverable housing target based on unrealistic population growth - due to the impact of events over recent years, a recession and reduced life expectancy, accompanied by a flawed calculation for economic land/jobs makes the plan unsound.**

**The case for modifying the number of houses on Green Belt from 4500 to 4400 is unsound as, has been shown above, there is no need to build any houses on Green Belt - there is enough brownfield so no 'exceptional circumstances' exist to allow the Green Belt boundary to be changed.**

## 2. Supply of Economic Land

2.1 The original allocation of economic land was far in excess of that required, which fortunately the inspectors have concluded. Fiddlers Ferry is providing just over 100 ha of economic land. I object to the modified figure of 168ha in the Vision and Spatial Strategy Para 3.2.3 as there is no need for more economic land than that provided by Fiddlers Ferry.

2.2 Warrington's Economic Development Needs Assessment (EDNA) 2021 concludes there is insufficient employment land. This is only because it has used the unprecedented release of land for employment at Omega to skew the figures. This has resulted in the figure of 316.26 Ha over the plan period, 17.57 Ha annually . If the job growth method had been used the shortfall over the plan period is only 21-43Ha land. Taking Omega out of the economic land use 1996 to 2020 gives an annual take up of around 8Ha, less than half the figure proposed originally.

2.3 Prior to this, an assessment of employment land was completed for the 2014 local plan. This showed the annual need was 11 Ha per year, an uplift of 20% was added to give the total requirement until 2027 (277 Ha). Again, the average figure was obviously affected by the take up of land at Omega, without which the average would have been around 9.5 Ha. Identified sites, completions, sites under construction and Omega phases 1 & 2 provided 268.36 Ha. Therefore only 8.64 Ha was needed until 2027. **The remaining land at Omega, (105.86 Ha) provided an excess of 97.22 Ha - a forward supply of 8.8 years beyond 2027 to 2035. This together with over 100ha at Fiddlers Ferry justifies the exclusion of the SEWEA from the plan and that this development must never go ahead.**

2.4 Paragraph 4.2.13 in the modifications shows a 'simple' calculation showing how many 'new' jobs were created. This is over simplistic as the so-called new jobs are often relocations such as the relocation of the Post Office, or temporary construction jobs. With the loss of many retailers nationwide and the tendency to work at home there is much less need for economic land. This has not been factored into the calculations. The over-optimistic jobs forecast is used to back up an unrealistic housing figure. Land at Omega, meant for economic use, has been recently used for housing, demonstrating the lack of demand for economic land.

## 3. Removal of land from the Green Belt

3.1 In Para 1.2.12 the modified amount of Green Belt to be removed, 390 ha instead of 580 ha, is still more than necessary and is unjustified as the calculations and narrative are flawed. Not building the SEWUE would save 239ha of undeveloped Green Belt.

The other areas that are shown to be removed from the Green Belt are attached to existing Green Belt settlements and should not be removed to preserve the character of the area. Fiddlers Ferry is within the Green Belt and should remain within it, allowing building on the brownfield areas and preserving the wildlife area in the south.

If any Green Belt is to be released for housing, it should be around the Fiddlers Ferry site, to allow a small amount of housing around the economic area, whilst preserving wildlife.

3.2 DEFRA ALC shows the land proposed for the South East Warrington Urban Extension (SEWUE) and the residential Pool Lane site in Lymm to be Very Good agricultural land. It should not be taken out of the agricultural land supply and Green Belt - doing so does not comply with the declared Climate and Environmental Emergency.

3.3 Removing land from the Green Belt will have a devastating impact on the environment and will only serve to make the air quality even worse, particularly near the motorway AQMA.

#### 4. Policy INF 4 Community Facilities

4.1 The site of the new hospital needs to be decided now - not left indeterminately in the future.

Para 7.4.9

4.2 The new health centre at Lymm, recently given outline planning permission as the reason for VSC to build over 100 more houses on Green Belt, must be included in the plan to ensure it actually gets built as soon as the houses are sold, not years later as happened with the promised Chapelford health centre, which started construction after a delay of 16 years.

#### 5 Policy DC3 and DC4 Green Infrastructure/Ecological Network

5.1 1 The infrastructure budget shows money has not been spent on some of the ecological mitigation requirements of previous planning applications, demonstrating more needs to be done to commit to green infrastructure. Para 8.3.20, 8.4.17 - listing what should be done to mitigate or compensate will be ineffective unless Warrington Enforcement Officers take action. More detail is required of what action will be taken for a breach in delivering ecological mitigation.

Para 9.8.6 There must be more detail in what is to be done to mitigate for damage to Manchester Mosses and a minimum level of compensation must be determined in the Local Plan before any development goes ahead.

**The amendments to the policies are unsound as there is no justification for release of Green Belt land. There is no case for 'exceptional circumstances' required by the NPPF for release of Green Belt, as there is sufficient brownfield for an achievable number of houses to be built over the plan period and beyond. The evidence used to try to justify the housing numbers and amount of economic land/jobs created is seriously flawed. The policies do not meet the needs of the area.**

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As I am not a planning expert please check the accuracy of the contents above.