

Local Plan, Planning Policy and Programmes,  
Growth Directorate,  
Warrington Borough Council,  
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Town Hall,  
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Warrington WA1 1HU

Patron  
Her Majesty The Queen  
President  
Emma Bridgewater CBE  
Branch Chair  
Peter Raynes

By email: [REDACTED]

21<sup>st</sup> of April 2023

Dear Planning Policy Team

### **Warrington Local Plan Main Modifications CPRE comments**

#### **CPRE**

We are CPRE, the Countryside Charity. We work with communities, businesses, and government to ensure that our countryside and green spaces can thrive.

We're working for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency. As the local CPRE group for Cheshire, we're part of a national movement advocating the kind of countryside we all aspire to: one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before.

We stand for a countryside that enriches all of our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate. We've worked for almost a century to support and promote the countryside, and we'll be doing this for generations to come. That's why we call ourselves 'the countryside charity'.

champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

#### **Warrington Local Plan**

##### **Housing Requirement**

MM 003 DEV1 Part 1 - CPRE believes the Housing Requirement identified is too high, so CPRE welcomes the reduced figures in the Local Plan. However, CPRE believes the figure should be much reduced to 550 dwellings per annum. It is recognised that this is as a consequence of the Government's requirement for the Standard Method to be used for calculating the housing need with mandated use of, now, out of date ONS 2014 data. The ONS 2014 data is predicated on flawed assumptions of growth that has not been realised. The Census 2021 data proves it. When Councils adopt a requirement that is too high it leads to problems. Inevitably it will fail the Housing Delivery Test, and in that event more land will be allocated for development, and this is almost always greenfield land, in the Green Belt, never intended for development. CPRE thinks this is wrong. It is leading to loss of farmland at an alarming rate, as evidenced in CPRE's report *Building on our food security July 2022*. Even the Government has awoken to the problem of the National Planning Policy Framework and has

consulted on changes, suggesting a revision to the rules to only require a 4 year housing land supply rather than the current 5 years + buffer. It will be a shame if Warrington needlessly loses its land in the countryside.

CPRE welcomes the MM 005 DEV4, which appropriately reduces the employment land requirement over the 18 year Plan period from 2021/22 to 2038/39 from 316.26 to 168 hectares of employment land to support both local and wider strategic employment needs based on the evidence put forward at the Examination. This will save countryside land at South East Warrington Employment Area – 136.92 hectares. We are highly supportive of this modification.

MM 016 ENV5 Part 77. The Borough's peat resources will be protected. In line with national policy planning permission for new or extended sites for peat extraction will not be approved and peat deposits will be protected from harmful development.

MM 021 MD3 Para 10.3.6 will help to restore ecological resources is supported.

We hope the improved Local Plan is adopted without delay to best protect Warrington's countryside, importantly concerning climate emergency, food security, biodiversity, landscape, Green Belt, and other important matters such as heritage and health and well-being. We recognise the hard work of the Local Plan Team to progress to this point. Everyone will be happier when the local plan can support good town and countryside planning decisions in the future.

Yours sincerely

Jackie Copley  
Planning Director

