

From: [REDACTED]
To: [Local Plan](#)
Subject: Representation on the Updated Plan
Date: 11 June 2023 16:02:47
Attachments: [REDACTED]

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Please find our representation on the Main Modifications to the Updated Plan 2021-2038.

Richard and Judith Chilton

Tim and Clair Fynn

June 2023

WARRINGTON LOCAL PLAN 2021-2038

Please find our comments on the Updated WBC Local Plan, 2021 - 2038. Our respective families have lived in the Borough for over 30 and 26 years. We are not affiliated to any political party. We are not planning experts, but we have many years of experience of developing strategy and investment planning.

In general, we are supportive of economic growth and the provision of affordable and good housing developments for the community. We support the concept of the Northern Powerhouse and Levelling Up. We disagree with the “not in my back yard” philosophy.

However, we believe that developments should provide overall benefits to the whole community, and they need to be achievable and sustainable. The benefits and negative consequences should be wider than financial benefits. They should cover a wide range of areas such as community needs, social mobility, the environment, economic growth, etc. In short, there must be a clear need to develop; there must be clear economic and social benefits in doing so; and the plan must be achievable.

Our comments on the updated Plan are:

- We previously submitted a detailed commentary as to why the existing Plan was unsound; that the housing forecasts were unreasonable and unachievable; and that WBC’s strategy was financially unsound. We maintain that the updated Plan still fails to address these issues
- WBC is determined to build on the green belt in the south east of Warrington and has continuously prioritised these areas for development. Very little development has proceeded on the brownfield sites in the Borough, whilst the many parts of green belt has already been lost forever. The greenfield sites, particularly in the south east of the Borough, have high environmental and biodiversity value and should arguably be the last sites selected for development. There are many brownfield sites and greenfield sites that have less environmental value within the Borough which should be developed first
- We believe that the development of the green belt in the south east of Warrington is politically motivated rather than a rational decision for the benefit of the Borough as a whole. In general, the south of Warrington is anti the current Council and by building more houses in the south east might be expected to change the political dynamics of the southern wards
- We understand and accept that the Council is required to use the Government’s methodology to determine the housing need. However, as with any target, this should be reviewed to check that this is a) achievable and b) that it aligns to the wider strategy and needs of society. In fact, HM Treasury’s Green Book approach defines that this should be done and how this should be done. WBC have failed to follow the Green Book approach whilst developing the Plan, and have failed to realistically challenge the target and hence develop a deliverable strategy that fully meets the requirements of society. The Council is more interested in meeting its own agenda to build houses on the green belt in the south east for its own political gain than serving the community it serves

- In the updated Plan, WBC state that the existing sites within the Borough can accommodate 10,700 new homes. This has been reduced from 11,800, without any reasonable justification, leading to 900 more homes being required in the green belt. WBC should be maximising the use of existing sites before building on the green belt
- We previously analysed the surrounding Councils' Plans and demonstrated that ALL Councils across the region had assumed net migration from their surrounding Councils. This clearly showed that the collective housing need forecasts were over optimistic and are very unlikely to be required in reality. Warrington is particularly vulnerable to not achieving its target, as Liverpool and Manchester both have more integrated plans with the surrounding Councils and are have better track records of being able to meet their targets
- WBC has historically failed to deliver it's housing targets and most of its strategic plans and major developments. There has been no significant changes in how WBC is organised and they continue to be very unlikely to deliver their Plan
- The updated Plan states a requirement for 14,688 new homes. This has been increased to 15,100 (10,700 + 4,400) in the commentary. Neither of these two targets are really required or are achievable
- On this basis, the focus for the new developments in the Borough should be in the following order:
 1. Use of existing brownfield sites (10,700 to 11,800 new homes)
 2. Development of and maximal use of the Fiddlers Ferry site (860 to 1,300 new homes)
 3. 'Incremental growth' across outlying settlements (800 new homes)
- This would provide between 12,360 and 13,900 new homes without the need for the developments on the south east green belt. The 13,900 target is highly likely to be the limit as to what is really required and what is achievable. Maximising the use of these sites first is therefore likely to be sufficient to meet the Borough's real needs. If it materialised that a higher target was actually required then the green belt in the south east should then be used, but it should not be developed first
- Fundamentally, WBC's strategy is unsound in that it is highly likely to unnecessarily destroy the environment in the south east forever, when a more practical and more environmentally friendly solution to prioritise other developments is available and achievable
- We recommend that the WBC's Plan be modified further to ensure that: a) the developments are phased to protect the environment across the Borough and remove unnecessary green belt developments at this time, and b) the housing target be further adjusted, in the shorter term, to something that is actually required and achievable. A target of 12,500 seems a much more sensible target