

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Subject:** Warrington Local Plan Consultation  
**Date:** 21 October 2021 16:32:00

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FAO Local Plan, Planning Policy and Programmes

Please find below my comments on the revised Local Plan. Comments are submitted in accordance with the six weeks consultation period,

### **General Comments**

1/ Overall I find the plan simply not fit for purpose and, with a few exceptions, simply a rehashed version of the previous version that has failed to take into account the key issues and concerns raised with regard to the previous version of the Local Plan.

### **Specific Comments**

2/ **Infrastructure.** Delivery of the plan appears to rely on use of existing roads and bridges which are already struggling to cope with existing demand. Where are the plans for new infrastructure to support the forecast growth in employment and housing?

3/ **Delivery.** Linked to 2/, without plans for new infrastructure to support the forecast growth in employment and housing how can the plan be delivered? In simple terms how can the higher levels of the plan (houses and employment areas) be built and sustained without robust infrastructure foundations?

4/ **Green Belt.** The plan fails to demonstrate clearly what the 'exceptional circumstances' are for development in the Green Belt. What is the threshold test for such circumstances and how does the plan measure against them? Has the 'exceptional circumstances' for development in the Green Belt been independently assessed and verified? The Green Belt is there for a reason, it is to prevent urban sprawl and irreversible changes to the ecology and character of an area. Taking some 1400 acres out of the Warrington Green belt when there is a significant volume of brownfield sites available for housing and employment is simply unjustified.

5/ **Growth Predictions.** The growth predictions are simply unrealistic and appear predicated on levels of activity and development rates that have never been achieved. What assumptions underpins these predictions and what independent verification has been undertaken of the predictions? Furthermore, what impact assessment of changing employment and working patterns that are emerging post Covid19 have been taken into account?

6/ **Employment.** Why is so much warehouse and distribution centre capacity included in the plan? The development of West Warrington over the past 30 years promised a science park and high tech, high value jobs but instead delivered low skill, low wage Logistics jobs. Why does the Plan appear to repeat this? How much more warehouse and distribution centre capacity does one town require? Where in the plan is the delivery of high tech, high value jobs that will be required to enable those working in the new employment zones to be able to afford the proposed new housing? Instead the plan will result in even more commuter traffic in the area as those working in the warehouse and distribution centre roles will have to commute in from areas with lower cost housing.

7/ **Housing.** What underpins the requirement for 4,200 new homes? Has the number of homes in the plan been subject to independent verification? Is this number consistent with current National Government planning rules or is it simply WBC simply looking to generate as much Council Tax income?

8/ **Air quality and Ecology.** The Local Plan appears to contain no steps to mitigate the impact of such extensive urban expansion on local air quality and ecology. Air quality in certain parts of South Warrington is already is already poor (e.g. Stockton Heath) yet the Local Plan will result in significant increases in road traffic through those areas as a result of no new Infrastructure. In addition such increases in road traffic is totally inconsistent with UK Government plans to achieve zero carbon emissions and the UKs Climate Change aspirations.

9/ **Loss of Landscape and Village Identity.** The Plan in its present form will result in a significant loss of greenbelt in South Warrington (cirac 1,000 acres) but along with that irreversible loss the nature of the landscape and local village identities will also be totally transformed with previous distinct village communities becoming part of a single urban sprawl. How does this loss of landscape and local village identities reconcile with WBC stated objective of preserving that character of South Warrington?.

10/ **Town Centre Regeneration.** Regeneration of the Town Centre is a stated WBC objective but the Local Plan fails to detail how the regeneration of the town centre will be achieved and how the success of that regeneration will be measured.

I trust constructive. Please contact me on email below if you have any queries.

Ian Brunt

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