

From: [REDACTED]
To: [Local Plan](#)
Subject: Objection to revised local plan
Date: 10 November 2021 10:28:21

Dear Sir

Re: Objections to Warrington Borough Council's revised Local Plan

I am writing to raise my objections to the revised Local Plan as part of the consultation process. In my opinion, despite the changes made since the PSV Local Plan, the revised plan is still unsound, unjustifiable and undeliverable. I believe that there are widespread flaws and weaknesses throughout the Plan. In my view this is not the right plan for Warrington as it fails to meet the needs of local residents and communities.

I believe that the revised Local Plan still remains unjustified, unsound and undeliverable for the reasons I detail below:

Housing & Economic Growth

I believe there is no justification for the economic growth levels stated in the revised Local Plan. The growth projections are based on unrealistic economic forecasts and population projections. The housing numbers, which underpin the Plan are, in my opinion, unrealistic and undeliverable. Growth predictions seem to be driven by the assumption that new housing will create economic benefit, instead of the other way.

Most of the new housing delivered under the Plan will not be affordable for local people. Developers will only be required to build a maximum of 30% affordable homes, which is not enough to meet the demand. For example, this will mean that many workers at the proposed warehouses and distribution centres would not be able to afford to live locally and so would have to commute from outside the area, so adding to traffic congestion & pollution.

In my opinion, the proposed development of employment zones on Green Belt is not backed by any meaningful economic strategy for the town. For example, Warrington is very attractive for logistic and distribution companies due to its location and road links. However, by focusing on this sector the Local Plan does not encourage sustainable economic growth and high skilled employment, as these sectors are often very poorly paid and becoming increasingly automated. This sector also does little to help address the global climate emergency we now face. In effect, we will be destroying Green Belt for a highly polluting industry which brings little in the way of skilled employment for the future.

As such, I believe that there is no justification for the predicted growth levels given in the Local Plan and so no need for the volume of housing and mass employment land. In my opinion, by including overly ambitious economic growth forecasts in the Plan, it has overstated the need for housing to meet this growth. If economic growth targets were more realistic then the housing numbers required would be reduced.

For these reasons I believe that the plan is unjustified, unsound and undeliverable.

Infrastructure

I do not believe that the traffic infrastructure proposals in the revised Local Plan, and the linked Local Transport Plan, present a coherent and deliverable plan. In my opinion they are totally inadequate to alleviate the current problems of traffic congestion, noise and air pollution across Warrington and also fail to support the proposed new housing and commercial developments.

Details of the plans for roads in the revised Plan remain vague. Some indicative plans are provided but these do not form part of the Local Plan. These details need to form the foundation of the Plan. The true effects of the planned development cannot be judged properly without these details. There needs to be a clear commitment to associated funding and a coherent plan for timely and effective delivery of infrastructure improvements.

The most likely outcome, if this Local Plan is approved, is that huge numbers of houses will be built across Warrington but the necessary supporting infrastructure will not be delivered. The Infrastructure Delivery Plan is dependent on roads and bridges that are already overstretched.

The development proposed does nothing to ease existing problems of traffic congestion and air quality and can only make things worse. For example, there is no explanation of how the already poor transport infrastructure of south Warrington can cope with increased levels of traffic. Increasing reliance on road traffic is also wholly inconsistent with the UK's Climate Change aspirations.

Wider Social Infrastructure

I believe that the revised Local Plan does not properly consider the impact that increased population growth will have on the wider social infrastructure and services of the town such as GPs, hospitals, social care and schools. While developers may be required to make a contribution to the 'bricks and mortar' that house some of these services, there seems to be little thought given to how the actual staff and resources required will be secured.

We are currently seeing a nationwide shortage of GPs, care workers, dentists and teachers, a situation which will only get worse. There is no detail in the Plan to show that this has been identified as a real risk to delivery, nor information provided about how Warrington Borough Council will secure the additional professionals required to provide these essential services to a fast-growing population.

For the above reasons I believe that the Local Plan is unjustified, undeliverable and unsound.

Green Belt

Government policy protects the Green Belt and any release needs to be fully justified. In my opinion the revised Local Plan does not present 'special circumstances' to justify the destruction of Green Belt in Warrington.

I do not believe that the plan adequately meets four of the five criteria for Green Belt release:

- To check the unrestricted sprawl of large built-up areas
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of villages

- To assist in urban regeneration by encouraging the recycling of derelict and other urban land

Again, in my opinion the question needs to be asked as to who is driving the Local plan – is it based on the needs of residents or is it driven by the developers looking to build profitable houses on Green Belt and green field land that is much cheaper to develop than brown field sites with the houses sold at a premium.

The Local Plan looks to reduce Warrington's Green Belt by 5% overall, with most of this earmarked for the 'Urban Extension' in South Warrington. I believe that the Council should re-visit the use of more brownfield sites in the town rather than target Green Belt.

I believe that the environmental and ecological impact of the loss of Green Belt has not been properly assessed in the revised Plan.

The importance of Green Belt had been highlighted further by the global climate emergency we face and the Government's plan to cut emissions to net zero by 2050. The Government's proposals mean that emissions from homes, transport, farming and industry will have to be avoided where possible or offset. The revised Local Plan appears to fly in the face of this aspiration and will lead to a huge increase in pollution across the town. This pollution will come from the massive increase in traffic from huge logistic businesses, house building and population growth, while destroying the very areas where trees thrive or could be planted to offset some of the pollution.

For these reasons I believe that the plan is unjustified, undeliverable and unsound

In conclusion, I believe that the revised Local Plan is still based on flawed assumptions and over-inflated economic growth targets which do not meet the needs of the people of Warrington.

I do not believe that the Plan is fully developed, as little realistic consideration is given to the costings and sources of funding for key elements, such as infrastructure. I believe the lack of detail over huge multi-million-pound infrastructure projects demonstrates that this plan is undeliverable. There is also little explanation for where the funding for the staff or resources to run additional social infrastructure will come from and no mention of how applicants to these posts will be secured, given the ever-increasing shortage of GPs, teachers and social care workers across the UK.

While I do not oppose sensible, proportionate development across Warrington, it is important that effective mitigation of the impacts of traffic congestion, noise, air quality, education and health facilities, local amenities and the environment are properly planned and implemented. Unfortunately it is my opinion the revised Local Plan still does not achieve this.

For all the reasons given above I do not believe this Local Plan is justified nor deliverable and is therefore unsound.

Yours faithfully

Jo Dimes



