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**Dr & Mrs R J Blackwell**



10 November 2021

**Warrington Borough Council**  
Planning Policy and Programmes  
New Town House  
Buttermarket Street  
Warrington  
Cheshire  
WA1 2NH

Dear Sirs,

**Local Plan - Updated Proposed Submission Version Consultation**

We are residents of Warrington and this letter is our representation on the Local Plan in accordance with Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012. While we welcome some of the changes made since the previous version of the plan, we still have serious concerns with the Updated Proposed Submission Local Plan. In our view the plan is not sound.

Our concerns relate to the level of growth, the release of Green Belt land and the proposed South East Warrington Urban Extension. We also note that the majority of consultation responses to proposed development version were “in particular relating to the release of Green Belt land”<sup>1</sup>.

We note that the Council’s primary reason for updating the plan was not the concerns over Green Belt release but “to provide a greater understanding of the infrastructure required to support the development proposed in the Plan”<sup>2</sup>. This is evidence that the Council’s primary motivation in producing the plan is to develop Warrington into a city<sup>3</sup> and to ignore both:

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<sup>1</sup> UPSVLP paragraph 1.2.6

<sup>2</sup> UPSVLP paragraph 1.2.8

<sup>3</sup> Note also the Council’s recent bid for city status despite reference to the “city masterplan” being removed from the local plan documents due to consultation feedback  
([www.warrington.gov.uk/news/city-status-bid-huge-opportunity-next-generation](http://www.warrington.gov.uk/news/city-status-bid-huge-opportunity-next-generation))

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1. the clearly expressed views of the residents, and
  2. the duty under the NPPF to not release green belt unless there are exceptional circumstances.

While the amount of land proposed to be removed from the Green Belt, 580 hectares, is reduced from previous versions of the plan, this is still not justified. The updated plan fails to adequately take into account representations made on the local plan under Regulation 18.

### **Housing Growth**

We doubt the housing growth forecasts are deliverable, but even if we take them at face value there is no need to release Green Belt until near the end of the planning period.

Updated housing growth requirements are calculated by the Council to be 816 homes per annum.

The green belt requirement is then calculated to be 4,372 homes. Of these 1,469 homes are a flexibility allowance above the need identified in the housing need assessment. The underlying shortfall is therefore 2,903 homes. This is approximately 3 ½ years at the end of the 17 year planning horizon. Plans should be reviewed at least every 5 years so there are at least two more Local Plan reviews before Green Belt needs to be released for housing growth.

When more realistic housing completion rates are used the need for any Green Belt release moves beyond the planning horizon. The Council's estimates are based on a housing need of 816 homes per annum which is significantly above the historic completion rate of 573 homes per annum<sup>4</sup>. The Council estimates that the Urban Capacity is 11,875. This can therefore accommodate over 20 years of housing growth at the historic rate.

It is very common for the actual rate of housing completion to be lower than that allowed for in Local Plans. It can be therefore concluded that it is exceptionally unlikely that the land proposed to be released for Green Belt will actually be needed for housing growth in the 17 year plan period.

### **Other options to accommodate housing growth**

The council could consider a number of options to accommodate this in the plan without requiring release of substantial parts of the Green Belt and a significant change to the landscape character. Options include:

- Increasing the density of proposed development within the SHLAA, Waterfront and wider Town Centre Masterplan areas above the proposed 50dph. For example in the proposed plan the Waterfront has 993 dwellings at 50 dph. Doubling the density in this one area

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<sup>4</sup> See Table 116 of the Local Housing Needs Assessment - Update August 2021

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alone to 100 dph would defer any need for Green Belt release for over one year. There are many variations that could be explored and 100 dph can be an attractive form of development in urban areas e.g. traditional terrace housing or more modern alternatives (for example the Borneo and Sporenburg waterfront development in the Netherlands).

- Limited release of Green Belt in the 2030's for 'incremental growth' across the outlying settlements

## **Employment Land**

The EDNA estimates for the Objectively Assessed Need range from 52 to 278 ha (Table ES1). The plan is based on an allowance of 316 ha which is far in excess of the OAN.

The South East Warrington Employment Area is proposed in the plan, requiring the release of 137 ha of Green Belt. The remaining 179 ha of the plan allowance is proposed to come from other sites.

Given the wide range of OAN estimates, all of which are less than the plan allowance, a mid range forecast would be more suitable for use. The mid-point of the OAN forecasts is 169 ha. This could be accommodated without needing to release Green Belt for the South East Warrington Employment Area.

The average employment land take-up over the past 10 years is 4.19 ha per annum<sup>5</sup>. If this rate were sustained over the plan period then the total requirement would only be 71.3 ha. Therefore, even using the mid-range estimate as suggested would allow for significant growth above the historic level.

The impact of COVID also reduces the need for employment land going forwards. This is not factored into the Council's assessment of need.

The pandemic response resulted in significant changes to working and shopping patterns. Significant numbers of people now work from home or in a hybrid pattern. This means that significantly less office space will be needed in the future. Furthermore the pandemic has accelerated the shift to online retailing. A number of major retailers in the town have already closed, e.g. Marks and Spencer and Debenhams. This trend is likely to continue. Vacated retail space can be repurposed for other employment uses.

It can therefore be concluded that there is no case to release Green Belt for employment land.

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<sup>5</sup> Ref. Table 20 of the EDNA, excluding Omega.

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### **Inadequate preservation of the landscape character**

The Borough of Warrington sits between two city regions: Liverpool and Manchester. The council's own Landscape Character Assessment (2007) states that the town of Warrington "is located centrally within the Borough and is surrounded by small village settlements and open countryside." It also states that "Warrington sits in an agricultural landscape of great variety". This landscape character, i.e. town, villages and open countryside, is of the utmost importance to us as residents and, we are sure, of many others. It is evident that the proposed local plan dominated by a growth aspiration is inconsistent with preservation of this landscape character. For instance, release of significant green belt will destroy the village, open countryside and agricultural character of South Warrington.

The National Planning Policy Framework (NPPF) 2019, paragraph 20(d) makes clear that conservation and enhancement of landscapes should be a strategic policy. This has clearly not been adequately addressed in the local plan. While the NPPF makes clear that plans should support growth, growth beyond "sufficient provision" for housing, employment etc. is not included in the list of strategic priorities for development plans in paragraph 20. The United Kingdom is also signatory to the European Landscape Convention which requires policy instruments aimed at protecting, managing and/or planning the landscape. It is clear that the UK's policy framework places a higher priority on landscape protection than aspirational growth and that this has not been reflected in the proposed local plan.

Furthermore The Landscape Character Assessment should form part of the evidence base for the preparation of Development Plan Documents. However in the Local Plan there is insufficient consideration to the impact that the adoption of policy W1 would have on the preservation of this landscape character. W1 implies a significant change of landscape character of South Warrington from town, villages and open countryside to an urban city landscape.

### **Failure to adequately consider lower growth alternatives in the Environmental Appraisal**

A sustainability appraisal has been prepared to demonstrate compliance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. Under Regulation 12(2b) the report shall identify, describe and evaluate the likely significant effects on the environment of reasonable alternatives.

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Overall the sustainability appraisal shows that there are likely significant adverse effects on Natural Resources and Landscape, as well as negative effects on Health & Wellbeing, Accessibility, Historic Environment, Biodiversity and Geodiversity, Climate change and Resource use (section 9.14 of the sustainability appraisal report). The appraisal does not show the likely significant effects of a range of lower growth scenarios equivalent to any of those outlined above. All scenarios considered involve release of Green Belt.

In the Updated Proposed Submission Version Local Plan there appears to be no discussion of the Sustainability Appraisal of a lower growth scenario when proposing policies relating to the growth target. This is contrary to the purpose of a Strategic Environmental Assessment. European Commission Guidance<sup>6</sup> states that: “The obligation to identify, describe and evaluate reasonable alternatives must be read in the context of the objective of the Directive which is to ensure that the effects of implementing plans and programmes are taken into account during their preparation and before their adoption.” The assessment of alternatives is a critical aspect of SEA and a frequent basis of legal challenge. It appears that Warrington’s local plan does not meet the requirements for this.

### **Recommendations for change**

The proposed plan is not fit for purpose and not sound. We recommend that the plan is changed in at least the following ways:

1. Reduce the employment land need in policy W1 and remove all release of Green Belt for employment land
2. Increase the density of housing development in the waterfront and town centre masterplan areas to 100 dph
3. Use an adaptive planning approach to defer Green Belt release until the 2030’s. The need to release Green Belt can be confirmed in future Local Plans if it proves necessary.
4. Any Green Belt release needed in the long term could be confined to incremental growth of the outlying settlements.

Limited release of Green belt later in the planning horizon would bring benefits. Firstly the need could be confirmed in a review of the Local Plan before the land is released. Secondly the release could be targeted in ways most likely to retain the landscape character of Warrington as town, villages and open countryside.

If Green Belt release is confirmed in this plan, developers would favour the green-field, Green Belt development of the South East Urban Extension. This would lead to rapid loss of the environmental benefits of this

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<sup>6</sup>See paragraph 5.11 of [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf)

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landscape and an unnecessary permanent permanent loss of the landscape character.

### **Poor Consultation Process**

Our ability to provide an effective response to this consultation has been hampered by the short consultation window for this updated plan. The 6 week period of consultation is generally taken to be the minimum acceptable period by the Government. This updated version does make significant changes to the previous version. It is almost impossible for the ordinary working families who are affected by the plans to review the 1,000s of pages of evidence in such a short time. Therefore this response is less comprehensive than we would have wished.

### **Summary**

We would also refer you to the work of the South Warrington Parish Council's Local Plan Working Group. We agree with their conclusions that:

- The plan is not deliverable
- The growth forecasts which underpin the plan are not realistic
- The plan does not demonstrate that there are exceptional circumstances for Green Belt release
- The most likely outcome of the plan is unsustainable development in the Green Belt
- There is no need to harm the local ecology
- There is no need to destroy the landscape character of South Warrington
- The plan is not sound

We are sure that the Planning Inspector will wish to consider these matters in some detail during the Examination in Public.

Sincerely,



**Dr & Mrs R J Blackwell**