

**From:** [REDACTED]  
**To:** [Local Plan](#)  
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I wish to object to the updated (2021) Local Plan to 2038. The following factors explain why the proposal cannot be deemed sound.

- 1. Forecast demand and projected population increases are unsound.** ONS population forecasts based on 2018 data imply the need for an additional number of houses annually that is significantly below the figure used in the Local Plan. The anticipated housing numbers are not based on an up-to-date or realistic assessment of likely future demand for housing land. The housing need figures on which the plan is based do not take account of significant changes since 2014 (notably EU withdrawal and COVID), which are likely to weaken demand by limiting future economic growth and reducing international migration. Moreover, the plan's timeframe (to 2038) is too long to allow a realistic assessment of future housing demand. This timeframe exceeds that in some comparable recent local plan reviews. There is extensive research evidence to show that population projections are subject to an increasing margin of error when applying over longer periods of time, to relatively small geographical areas such as an individual local authority, and/or in the context of substantial uncertainty linked to wider economic and political volatility. These factors mean that the proposed release of green belt land lacks a credible evidential basis.
- 2. Forecast supply of housing is unsound.** The assessment of existing housing land supply on which the plan is based does not take account of recent changes which further reinforce the need to promote the regeneration of Warrington town centre and the wider core of the borough. The decline of the physical retailing sector, and its quickening pace, means that existing sites in Warrington will become available for development as housing during the plan period. In addition, an increased proportion of brownfield sites already identified for future development may be viable only for housing rather than competing land-uses. The most recent SHLAA (2020) was agreed before the full impact of the COVID pandemic on physical retailing had become apparent. The subsequent contraction of retailing, and the reduced demand for future retail space, is very likely to intensify. This will yield additional potential for new housing development on land allocated for other uses, as well as the conversion and repurposing of existing retail space. Releasing additional housing land elsewhere on the scale proposed in the urban extension will undermine WBC's own strategy to promote new development in central Warrington and encourage the recovery of the town centre.
- 3. Infrastructure capacity and the absence of a coherent future plan to ensure the**

**plan is deliverable.** The proposed housing development would create additional strain on a transport network that is already operating close to or in excess of capacity. The resultant increase in the demand for transport is again acknowledged in the latest draft of the plan. However, there is as yet no coherent or convincing proposal in relation to the expansion of infrastructure capacity. The plan provides only a preliminary indication of potential future infrastructure development. There is no clear or detailed indication of the location or extent of new highways provision or junctions to link the proposed development to the motorway network. The one additional major crossing proposed for the Ship Canal is located west of Warrington and would do little to help in respect of north-south traffic to and from the area in which most of the proposed residential and industrial development would be located. The proposed link may not receive the necessary funding to proceed, calling into question the viability of the proposed future development of housing in south Warrington and the soundness of the plan.

4. **Loss of amenity, environmental impact, habitat loss and impact on nature conservation.** The loss of valuable greenbelt land will adversely affect the quality of life of Warrington residents. The proposed urban extension will mean a significant loss of green infrastructure. The release of land on such a scale is unwarranted in light of population increases that could conceivably be significantly below the forecasts on which the plan is based. The plan is rooted in WBC's wider development aspirations, and not on any objective measure of anticipated future demand for new housing land. Increased traffic linked to the proposed urban extension will have a significant impact on air quality. This is especially important given the failure to develop coherent proposals for enhanced public transport. The plans will result in further erosion of biodiversity.