

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Subject:** Warrington Plan Representation  
**Date:** 14 November 2021 21:12:10

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Dear Sir,

I wish to make representation on the Warrington Local Plan. The local plan is crucial for sustainable development, and while the new plan is an improvement over the previous consultation version it is still not a good plan. After numerous years without a full plan (due to the quashing of the housing section) Warrington not only needs a plan but also a good one. We are in a Nature and Climate emergency. The agreement at COP26 in Glasgow and the long awaited passing of the Environment Act 2021 shows just how important both climate and nature are to society. The plan does not reflect this. It must be amended to deliver for nature and the environment.

The sewage infrastructure across the country is outdated and struggling to cope with increasing population and additional developments. In Warrington the River Mersey should be one of our greatest assets. It feeds the ship canal and is the source of our industrial heritage. Its bed and banks should provide a refuge for nature. It should be a source of enjoyment for those living and working in the area. It should not be an open sewer each time it rains and our overloaded combined sewer system cannot cope. There must be an area wide sewage strategy which sits alongside and is integrated with the sustainable drainage aspirations already contained within this plan. Furthermore, the proposal for a waterfront development on the banks of the Mersey has not considered this negative aspect of the River Mersey and should be revised. If this is not within the Council's remit, it must work with United Utilities to implement such a plan. The expense of acting now is far less than the expense of acting when the problem is worse still.

In relation to housing and other development in the Green Belt then local plan is currently unacceptable. Warrington has consistently undelivered on completions. Table 17 of the Local Housing Needs Assessment (August 2021) shows 2,465 homes were required but just 1,403 (57%) were built between 2016/17 and 2018/19. Under the NPPF, as delivery was less than 75% of the housing target, the borough is in the 'presumption' category and paragraph 11d applies. This declares the development plan out of date and increases the weighting given to the NPPF. As the overall Local Plan housing target has been quashed this most likely has little practical difference.

The pandemic and brexit have no doubt impacted housing completions over the last couple of years but, as shown in Table 18 of the Local Housing Needs Assessment (August 2021) completion over the last decade fluctuates around 580 per year. The 2021/22 completion rate, as shown on page 272 of the draft plan would more than double the previous record for housing completions in a year. With the information available, it is questionable how realistic that is.

The Updated draft Warrington Plan allocates an average of 816 homes per year for the plan period. Based on the long term trend, only around 71% of these would be built, placing the borough back into the 'presumption' category. This is not acceptable. It is also noted that the housing is divided unequally over plan period. For the first five years, when the target is 678, a far more acceptable proportion, around 86%, are likely to be completed based upon the historic data. The later part of the plan period however increases the housing numbers and, unless completion rates increased, there is a higher risk of again falling into the presumption category.

Planning cannot control housing completions. It can only provide targets. Nonetheless, if these are not met planning is penalised. The housing numbers in the Warrington plan are based on the standard method. Importantly, while use of this method is expected it is not mandated (see paragraph 2a-002/3-20190220 of the PPG). In Warrington, good reasons exist to deviate from the standard method. Strategic policy makers can take into account under delivery (see paragraph 2a-011-20190220 of the PPG). Given this, the number of houses over the plan period should be reduced to that proposed for the first five years – i.e. 678 per year. This potentially could be caveated with a requirement to review the numbers and allocate further sites in 5-10 years if completion continually exceeds the historic trend for several years.

The housing numbers are fundamental to the argument for the release of the Green Belt. As above, it is considered these numbers are unrealistic. On this basis, more Green Belt than necessary has been marked for release. Release of Green Belt through the plan is less stringent than release through very special circumstance. The plan should not be an excuse to circumvent the requirement to prevent urban sprawl by keeping land permanently open. In addition, Green Belt is special due to its openness and permanence. If any is lost, more should be added.

It is worth highlighting that four bedroom units will not be affordable to households on housing benefit in areas other than Inner Warrington and the Town Centre and one to three bedroom houses are also unaffordable in Lymn and South Warrington. Some of the Green Belt release sites are in these areas. As such the release of land from the Green Belt will not help equitable development of the town.

Finally, as our climate changes, the availability of water will be a more pressing concern. There needs to be planning at a supra-regional level to direct development to where this vital resource is easily sourced. There also needs to be strategic planning within Warrington for water storage infrastructure to meet the needs of the existing population. This element of infrastructure has been omitted from the local plan and must be addressed.

Yours faithfully,

Jane Kelham

