Local Plan Planning Policies and Programmes Warrington borough Council New Town House, Buttermarket Street, WARRINGTON WA1 2NH

11th November 2021.

Dear Sirs

Warrington Local Plan - Objection Letter

I am writing to lodge a formal objection to the latest version of the Warrington Plan 2021. It is very clear that following the withdrawal of the previous version published in 2021 very little thought has gone into the production of this latest plan and very little notice has been taken of the amendments suggested by the various groups which have raised well researched Alternatives.

The emphasis of this latest suggested plan like the last one has clearly been prepared on the presumption that the majority of the development will be carried out on land released from the Green Belt rather than prioritising the use of Brown Field sites, clearly in contravention of the NPPF!

All previous development plans since the 1980's have accepted that the Green belt in Warrington serves the purposes and functions of a Green Belt.

Now Warrington BC are proposing a massive encroachment into the Green Belt. I am familiar with the NPPF and I can see no evidence that there are exceptional circumstances as required by para 137 of the NPPFto justify these huge areas being removed from the Green Belt.

WBC's 2020 SHLAA shows that from 2003 until 2020 only 7,006 houses were completed, that is an average of 412 houses per annum, less than 50% of the average annual delivery anticipated within the Submission Draft.

Reflecting house builders average completion rates of 35 to 40 dwellings per annum the average anticipated delivery is unachievable, there are not enough house builders in the region to achieve that figure!

Reference is made to Affordable Homes but there is no incentive for Housebuilders to build these when the price of land in South Warrington is so high!

The plan has allocated a huge acreage of land for Employment purposes which is important for Growth, however because of Warringtons location close to the Junction of the M6 with the M56 the only interest will come from the Logistics Industry and it is accepted that in employment numbers the jobs created will be 50% of jobs created by normal B1 and B2 users!

Logistic Companies also require vast areas of parking for Trucks and Trailers, which are not used all year round but only at Peak times. How can that be classed as exceptional Circumstances as required by the NPPF Para 137?

The type of jobs will mainly be lower paid jobs which means that because South Warrington land is so expensive the lower paid workers will not be able to afford the houses which will be built near by! This will mean a lot more car journeys which will have a serious effect on pollution and particularly Air Quality.

As Warrington is already above the WHO threshold, with measurements taken during lockdown, the hotspots of Stockton Heath and Latchford will become even more polluted! No provision has been made in the Plan to provide additional crossings of the Manchester Ship canal, whether at high level or low level so the Air Quality will get much worse and will cause serious respiratory health problems.

My other major concern is that the Plan suggests that not all the required Infra Structure will be deliverable during the Plan Period? It is therefor perfectly possible that major roads and road improvements will not be carried out even though all the development will go ahead! That means therefore that the development as proposed is not deliverable during the plan period.

In conclusion therefore I believe that the Plan as proposed is undeliverable and furthermore is generally not Sound and I ask that the Inspector throws out the whole Plan as proposed.

Yours Sincerely

Robin Brocklehurst

Former Chartered Surveyor now retired.