

Response 936

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: James Mann

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

Contact details	
Organisation name (if applicable)	N/a
Agent name (if applicable)	N/a
Address 1	[REDACTED]
Address 2	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list:
multiple

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant	X	
Sound		X
Compliant with the Duty to Co-operate	X	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

This is our response in relation to the Warrington Borough Council Local Plan (LP) Pre-Submission Version (PSV) consultation.

We support the council in the need for a Local Plan. It is clear that a lot of time and money has been invested with consultancies. There is some good work, and some parts have good meaningful evidence which the community supports. We also support the principle that some development and growth is needed, in terms of additional housing and transport infrastructure. We have no concerns about the Local Plan for North Warrington, North of the River Mersey.

While there are solutions to the various needs, this LP PSV, amended from the Preferred Development option is not sound for four reasons:

- The Local plan should be more positively prepared after this much time and opportunities from consultation - providing a strategy which as a minimum seeks to meet our objectively assessed development needs

 - The development needs in terms of transport are inadequate and not objective. They appear to be produced to find a way to make the proposed Local Plan acceptable, not objectively based on current and future needs. The local plan is written as an aspirational document, not a plan.
 - The fundamental need for alternatives to the A49 North from M56, from South Warrington to centre of Warrington is not addressed. Ongoing reliance on 3 very old single lane swing bridges and a weight restricted high level bridge and not robust and the real world evidence from residents concludes that the supposed validated traffic model is deeply flawed, and clearly been conducted as a desktop study and using optimistic conditions.
 - Heavy vehicles/pollution are a clear concern, yet while the consultation documents together aim to move away from traditional transport, the intent is to allow more employment land using this type of vehicle.
 - Central government process – factor of population/household projects, future job growth, economic aspirations
 - It is stated that the Local plan should be shaped by local communities, i.e. the needs of the local communities. This plan has not been shaped to any significant level by the cohesive community groups of South Warrington, as witnessed by the level of continued opposition, and little change from PDO to PSV versions. The council is over reliant on the developers interests and consultancies with little or no knowledge of the reality for South Warrington
- The Local Plan should be more effective, key issues have not been completely or robustly assessed to make it deliverable over the plan period.

 - There is no meaningful detail for strategic routes across the ship canal, despite notional land held for a replacement bridge. The real world evidence clearly suggests further crossing of ship canal is needed, but with the high level needed, the obstructive railway embankment to the north side, the lack of connected route to the road network across the Bridgewater Canal to the south side, and the elevation to climb the hill to the North, this is not a deliverable solution.
 - Warrington Hospitals & health services are already struggling to cope, and there is ample evidence of this in the community. There is nothing in the plan to address this critical need. It is not a question of facilities, it is a question of staffing, skills and funding.
 - There is an inability of development to fund new infrastructure required, there are multi-million investments >£100m needed in infrastructure, but no coherent plan nor calculations to how this is deliverable.
 - To be deliverable the traffic issues need addressing before extra housing. There is no clear time sequenced plan, to demonstrate this, instead there is a drive to building houses before infrastructure, with a combination of more housing traffic and more construction traffic on an already saturated road network.
- The Local Plan PSV is not adequately justified with comprehensive credible evidence. The opportunity to consider and use reasonable alternatives in preparing the Plan have been passed over.

 - Considering the technical, financial challenges and excessive need for greenbelt release indicated, the plan should be limited to 15 years not 20 years, reducing the amount of uncertainty/assumptions made. The Local Plan is also dated retrospectively from 2017 (2017 to 2037). It would be sound in the circumstances to use 15 years 2019 – 2034), thus reducing the total numbers for housing and employment land significantly to preserve Greenbelt at all costs.
 - The housing target in the local plan at 18,900 is <15% reduction from the PDO consultation. PDO 22,260, 7000 Garden City Suburb, These numbers are still well beyond government guidance (and are not targets). Considering this is driving enormous amount of Greenbelt Land the uplift should not be applied, as the circumstances are not 'exceptional', they are the wish of Warrington Council.
 - The LP PSV gives ~945 for 20 years. The number should not exceed 909,(no SEP uplift, refer to Table 4.1) and the plan should only be for only be for 15 years (giving a need for ~14,000 homes, reducing the need for irreversible release of greenbelt land.
 - The call for employment 362 Hectares is a <5% reduction from 381 Hectares land in PDO, but this number is not set by government targets, but by WBC aspirations for growth. There is no rating of employment per Hectare, which would be more meaningful, and the consideration of existing vacant land is flawed and not supported by the amount of land and commercial premises currently for lease recorded from travel around 7 existing commercial areas of Warrington). The economic & growth is overstated and not realistically supported by evidence.

- The PSV cuts across WBCs own strategic objectives –
 - o W2 - use of green belt (check the unrestricted sprawl of large built up areas, assist in safeguarding the countryside from encroachment / to preserve setting and specialist character of historic towns, to assist in urban regeneration)
 - o W2 - destroys the character of the village, countryside & environment
 - o W4 – overloads local roads, schooling & amenities
 - o W5 - Re-enforces character of local distinctions
 - o W6 - Increase noise & air pollution levels
- Local plan economic development is driven through release of new land from greenbelt, not better enabling existing/vacant land.
- Section 3.4.10 Garden suburb capacity for growth beyond plan period. This does not constitute exceptional circumstances for release of the extent of greenbelt
- Section 1.1.7 Local plan states that it is developed with local community – however there is little evidence of this, beyond response to the 4,500 previous objections. WBC nor their consultants did not effectively consult South Warrington representative bodies.

4. The Local Plan is not consistent with National policy – including the National Planning Policy Framework and associated Planning Practice Guidance

- W2 - Warrington Green belt Permanence
- The principle is that Greenbelt should be released for exceptional circumstances.
- Council justifies exceptional circumstances for greenbelt release, however
 - o Greenbelt should be last to be released, not first
 - o Green belt is being released for economic growth, not minimum needs
 - o There is nothing suggesting that 'poorly performing' greenbelt can be released. The greenbelt assessment is weak, and was done without consultation of local community.
 - o A 10% contingency in land requirement, does not constitute exceptional
- The process used, and outcome suggests a desktop exercise producing conceptual maps have not looked closely at existing boundaries and green areas to preserve as many trees, wooded areas and hedgerows as possible..
- 5.1.4 Neighbourhood Dev Plans influence Greenbelt, however it appears the approved Appleton Thorn Neighbourhood Plan is being ignored.

We urge Warrington Borough Council to work with the ample number of representative bodies in South Warrington to come up with a different robust Local Plan that far more soundly addresses the various needed and commands much more support than currently.

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate. Please be as precise as possible.

As far as I understand, it appears legal, but I am not an expert. I believe WBC has consulted with statutory bodies.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan should be 15 years, not 20. The housing uplift should not be applied, the housing should be about 14,000 as a result, the employment land should be about half of that proposed. The Greenbelt release should be dramatically reduced as a consequence. The plan should credibly and effectively address transport issues. The plan needs a delivery plan including funding assessment.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
I believe there are enough collective representatives.

You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)