



11th November, 2021

Please find my response to the Updated Proposed Submission Version Draft Local Plan.

The housing target of 816 units per year is undeliverable, based on the previous performance. Michael Gove has stated that targets obtained using the algorithm can be challenged, especially where there is insufficient infrastructure to support such a number. Part 2 of the Brownfield Register needs to be completed before any further work is done on the Local Plan, to inform the forward supply. The policy DEV1 is unsound as it is not deliverable and there is currently insufficient evidence to arrive at a valid target figure.

Given the current economic climate it is not justified to release Green Belt for the South East Warrington Employment Area (SEWEA). The amount of land required uses the assumption that a similar amount of land to that released for Omega will be utilised again. There is no evidence to support this assumption. Furthermore, the Fiddlers Ferry site will provide employment in the short and longer term. The policy DEV4 is unsound as there is no justifiable evidence for the overly ambitious economic growth.

The regeneration of the town centre must be a priority, to prevent even more people moving away from Warrington. A detailed plan, showing how many units of housing can be created by regeneration needs to be drawn up. Housing densities of 250/Ha need to be used wherever possible to take the pressure off the Green Belt. With sustainable transport and higher population densities in and around the town centre, a greater proportion of the community will be less car dependent. This is an improvement over the current trend to build large housing estates on Green Belt which are totally car dependent. Policy DEV5 is unsound as it does not meet the needs of the area and alternatives have not been considered.

There is no justification for removing land from the Green Belt as the evidence on which the housing targets and economic land requirements are not sound. The land proposed for the SEWUE, the SEWEA and the residential site at Pool Lane are on land classed as very good by DEFRA. This land must not be built on. The policy is unsound as it is based on erroneous housing and economic growth projections. Consequently policies GB1,MD2,MD5,MD6,OS1,OS2,OS4,OS5,OS6 are unsound as they require the removal of land from the Green Belt.

Due to the serious congestion issues on the roads, infrastructure needs to be updated to remedy past failings before more development takes place. Over the last twenty years there has been a massive increase in housing in Lymm: Cherry Fields, Bucklow Gardens, Chase Meadow, Rushes Meadow, Hollytree Gardens, Wellcroft Gardens, Sandstone Brook, Lane End development. There has been no visible infrastructure (other than the necessary roads within the estates) or community facilities put in place for this enormous increase in the 'village' population. The road which links all these houses to the motorway is the B5148 with no lights or pavements and no traffic control measures on the dumbbell roundabouts. The strategic location of Lymm fire station will be further compromised by the increased traffic from SEWUE and SEWEA. The mass transit system required to make the SEWUE sustainable is at an extremely early stage of development, with no funding/costing in place. One cannot exist without the other. It is interesting that the plans for Peel Port have been withdrawn now the future of the Western Link looks uncertain - this was another dual project where it was claimed one cannot exist without the other. There is insufficient detail in the infrastructure funding document to have any confidence, given the past failings, that the required infrastructure will be delivered.

The policies INF1 and INV5 are not sound as they do not meet need and there is no evidence that they are deliverable.

Overall the Updated Draft Submission Version Local Plan 2021 is unsound as the principles of growth and destruction of green spaces are contrary to the declared Climate and Environmental Emergency.

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