

Firstly, some comments on the consultation process. I was unable to attend one of the Council's consultation events due to having the "super" cold that has been doing the rounds this year. It was disappointing that these were only held between the 12<sup>th</sup> and 20<sup>th</sup> October ie just over a week of the 6 week consultation period, particularly in view of Covid where people need to self-isolate for longer than this, and the time of year when people were predicted to suffer more this year from colds and flu due to all the social distancing over the past 18 months. It is also disappointing that they were only held in the one venue at the Halliwell Jones Stadium with no events in South Warrington which is the area of Warrington which will be the most effected by the plan. This does however reflect the lack of facilities in South Warrington. These limits to the consultation mean that the consultation was inadequate.

It is good to see some of the changes from the 2019 Draft Local Plan (DLP), however, many of the same issues remain which render this version unsound including:-

- Lack of suitable infrastructure improvements, particularly from the proposed developments in the south east into the town centre.
- The plan does not address the existing congestion and poor air quality and the proposals will make them worse.
- Lack of justification for the predicted growth
- Unnecessary to remove so much land from the green belt.
- The policy to develop brown field sites first is not backed up by the phasing proposals

Paragraph 1.2.9 of the DLP states that "In October 2020 the Council took the decision to pause work on the Local Plan. This was due to the economic and wider impacts of Covid 19 and the Government's proposed amendments to the standard housing methodology." The Economic Development Needs Assessment (EDNA) Final Report - August 2021, in the 2021 evidence base documents, identifies that many companies will continue with some staff homeworking and also that there has already been some applications for change of use from offices to housing., however this has not been reflected in the requirement for land to meet the housing need or the employment need. There should have been an assessment of the likely freeing up of space due to reduced office working and a consequent reduction in the overall need and hence a further reduction in the need to take land from the green belt. This makes the plan unsound.

The EDNA in paragraph 9.4 states "The forecasts of industry sector activity (jobs), suggest much more modest land needs." But totally dismisses this forecast in favour of using past growth. This is clearly not sustainable, as required by the NPPF, as it would eventually result in no green belt left in Warrington. Therefore this makes the plan unsound.

WBC declared a climate emergency in June 2019, however they have still not written a climate emergency action plan. There is a published green energy strategy and a draft electric vehicle strategy, currently out for consultation. However, an overall plan is needed and should have been used to inform the DLP. This is an extremely important omission and is exacerbated by the lack of ambition in the proposals. WBC is aiming to be carbon neutral by 2030, however the only plan for reaching net zero rely on working with others and relying on them to reach net zero. This is clearly an inadequate response that makes the plan unsound.

I retired in 2015 but prior to this lived in Appleton Thorn and worked in Great Sankey, the shortest route was through town, however, as this route was considerably slower during peak times than using the motorways then I would use the M6 and M62. This was twice the distance and clearly the traffic situation is worse now than it was then. The plan does nothing to improve travelling from the south east of Warrington either to the town centre or to the north side of Warrington, in fact it does just the opposite by proposing so much more housing and employment areas but no new road crossing the canals and river. This makes the plan unsound.

The National Planning Policy Framework (NPPF) states that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”. As I believe that the growth is exaggerated then clearly exceptional circumstances do not exist. Also the council have a policy of using brownfield sites first as dictated by the NPPF however they contradict this by putting some of the greenbelt development into the first tranche. Surely the only greenbelt release at this stage should be that needed for the early stages of the plan, this would probably mean that little or no greenbelt was required. A new plan is needed in 5 years’ time and this would be reviewed then. Most of this greenbelt land is currently used for agriculture and is classified as grades 2 or 3 agricultural land i.e. the best and most versatile as described in the NPPF:-

Chapter 15. Conserving and enhancing the natural environment

170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the **economic and other benefits of the best and most versatile agricultural land**, and of trees and woodland;

This supports the statement “We want the planning system to contribute to our objective of no net loss of biodiversity; to encourage local authorities to promote multi-functional development so that we get the most from land; and **to protect our best and most versatile agricultural land.**” In the Governments publication [The Natural Choice](#)

The NPPF also states that:-

83. Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

The loss of 5% of the boroughs best and most valuable agricultural land over the plan period is irresponsible, damages the country’s food security and contributes towards climate change rather than mitigate against it.

Policy Dev 4 of the DLP point 15. states “When the genuine needs of local rural businesses cannot be accommodated within settlement boundaries, and development would be located within the Green Belt, proposals will need to demonstrate that ‘Very Special Circumstances’ exist to warrant the granting of planning permission.” This contradicts the NPPF paragraphs 149 and 150 where exceptions are defined and more importantly the need to demonstrate “Very Special Circumstances” is not included in point 12.

It is good to see that the proposals for Fiddlers Ferry include a mix of housing and employment facilities, I hope that the employment and housing type will be matched so that commuting can be limited. It would be good to consider giving grants towards the house purchase for people with jobs

within the site. It is a shame that other proposed developments aren't considered in the same way, for example the proposed employment facilities in Appleton Thorn. The existing employers already employ very few people from the local area so extending this development means considerably more commuting.

I trust that these constructive comments can be incorporated into a revised Local Plan prior to sending it to the Planning Inspectorate.

Regards

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