

# Proposed Submission Version Local Plan

## 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 reference number.

**Name of person completing the form:** Peter Lovell

**Email address:** [REDACTED]

2. What type of respondent are you? Please select one option only.  
If you are an agent please select the type of client you are representing.

A local resident who lives in Warrington

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	-
<b>Agent name (if applicable)</b>	-
<b>Address 1</b>	[REDACTED]
<b>Address 2</b>	[REDACTED]
<b>Postal Town</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone number</b>	[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.

Plan as a whole

2. What does your comment relate to? Please select one option.

Both of the above

**If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).**

There are too many inter-related matters for comment that bridge between and across various paragraphs and policies that make it impossible to comment on individual sections of the Local Plan Proposal independently. Hence, selection of "Plan as a whole". Thus the comments under question 4 of the form below are integrated and, where they relate to specific paragraphs and/or policies, their numbers are given in the comments.

3. Do you consider the Draft Local Plan to be: 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.

The reasons for our answers are set out in the attached document entitled "Lovell-Peter Response to 2021 Form Question 4"

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.

The "Yes/No" answer required in relation to legality in Question 3 of the form is unfair to ask of citizens who are not qualified in all the legalities. Based on the brief information provided in the "Consultation Guidance", the answer I am obliged to give in relation to legal compliance is "Yes", with the presumption that Warrington Borough Council would not entertain submitting a plan that is illegal.

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.

Proposals are set out in the attached document entitled "Lovell-Peter Response to 2021 Form Question 6"

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.

Yes, I 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 it is important for the inspector to hear my responses.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Lovell-Peter Response to 2021 Form Question 4.pdf - [REDACTED]
- File: Lovell-Peter Response to 2021 Form Question 6.pdf - [REDACTED]

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**Comments/file description**

See form questions 4 and 6 comments

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**

**Response to the Updated Proposed Submission Version Local Plan (September 2021)  
by Peter Lovell and Valerie Lovell**

**Statements concerning Form Question B4**

**Failure on Duty to Co-operate and on Soundness**

**Failure on Duty to Co-operate**

1. Based on the Consultation Guidance, we have answered “No” to Question 3 Duty to Co-operate because there is insufficient evidence in the Updated Local Plan documentation that WBC has fulfilled its obligation to “engage constructively” given that feedback in each of the two previous consultations does not appear to have received full recognition with appropriate responses.
2. There is no evidence of our specific comments on failure of the 2019 draft plan in relation to failure on soundness and suggested alternatives to the proposals being recorded in the Regulation 19 “Responding to Representations Report” on 2019 representations.
3. There is no evidence of serious consideration in the Updated Local Plan documentation about the high level of objections raised by South Warrington residents in relation to the current poor state of north/south traffic flow between south of the Bridgewater Canal and the north-side of Warrington Town Centre. In the 316 page proposal, there only is a throwaway comment, not backed up by any intention or plan, for “a possible further crossing of the Ship Canal” (as quoted from section 10.2.8).
4. The Updated Local Plan fails to justify fully, on a factual evidential basis, the massive extent of release of green belt land in South East Warrington despite the high level of requests for such justification by South Warrington residents.

**Failure on Soundness**

Based on the Consultation Guidance, we have answered “No” to Question 3 Soundness because we do not consider the Updated Local Plan to be “Justified” (i.e., “it is not an appropriate strategy”) for the following reasons.

***Failures in Relation to Green Belt Release***

1. The plan contains no factual evidential basis for release of large swathes of green belt land for residential development.
2. The justification for discounting larger scale extensions to one or more of the outlying settlements (section 3.3.16) applies equally to the proposed South East Warrington developments of green belt land. Hence, it also is a justification for excluding Policy MD2.
3. No consideration has been given to smaller developments around outlying settlements, despite the benefits of this in terms of distribution of local impacts on the green belt and of traffic loading for flow into and out of Warrington Town Centre and Retail Parks (all of which are north of the River Mersey).
4. The wording of the proposed plan for use of green belt is loose, specifying housing in minimum numbers, which by definition can be exceeded.

***Failures in Relation to Policy INF2***

1. Policy INF2 is inadequate in relation to Policy MD2 – in the current and previous proposed plans, WBC have not made any serious attempt at providing proportionate additional traffic flow capacity from/to the South East Warrington development to/from Warrington Town Centre and to/from the north side of Warrington Town Centre.
2. The new vision for South Warrington set out in Policy MD2 will generate traffic flow from 2,400 new homes (rising to 4,200 beyond the period of the plan). Traffic flow from/to South Warrington to/from Warrington Town Centre requires passages across the Bridgewater Canal, the Manchester Ship Canal and the River Mersey, which already are congested at many times during the day and often gridlocked at the Manchester Ship Canal crossing pinch points in Stockton Heath, Latchford and the Cantilever Bridge. There frequently are long traffic queues in both directions at each of these locations. The proposals in Policy INF2 do nothing to

alleviate these restrictions in traffic flow. Instead, Policy MD2 would add massively to the existing problems of traffic flow.

3. The retail areas of Warrington Town Centre and the Riverside, Junction 9 and Gemini retail parks are more than sufficient in size and variety to satisfy the needs for Warrington Borough residents across the whole borough (i.e., there is no need for additional capacity), as stated in the current proposed plan. Thus, existing residents make good use of them and the same would be true for new residents associated with MD2. However, access to all these retail sites requires traffic flow from/to South Warrington to/from the north side of the River Mersey or the north side of Warrington Town Centre. It is extremely unlikely that this will be anything other than by car in order to collect goods not easily transported by public transport. There are, however, no plans to enhance traffic flow from/to South Warrington to/from these retail areas.
4. Instead, in relation to Policy MD2, Policy INF2 focuses exclusively on internal road infrastructure, internal walking/cycling routes and access to the A49 and M56 Junction 10. It is clear that WBC are failing belligerently to address the major problem of traffic flow from/to the proposed South East Warrington development to/from the Town Centre and to/from the north side of Warrington Town Centre.
5. The proposed Bridgefoot Link and the Western Link will ease traffic flow around the west of Warrington Town Centre, but they will have no significant impact on easing the traffic flow from /to the main areas of South Warrington, particularly in relation to traffic associated with the MD2 development to/from the Town Centre and to/from the north side of Warrington Town Centre.
6. The proposed new/replacement for the Cantilever Bridge across the Manchester Ship Canal will have no effect on traffic flow because the connecting roads (Ackers Road and Station Road) are narrow and incapable of taking more traffic. Even now, these roads often have long queues.
7. The Transport Modelling referred to in the plan concludes that the existing road infrastructure is sufficient to absorb the extra demand arising from MD2, which comprises 2,400 new homes rising to 4,200 new homes beyond the period of the plan. The visible evidence now is that the routes from South Warrington to/from Warrington Town Centre already are heavily congested with long traffic queues in both directions at many times of the day. It is very apparent that the modelling was both inaccurate and inadequate.
8. It is irresponsible of WBC not to have instructed an independent survey of actual current traffic flow across a period of 1-2 weeks during daytime (i) at each of the current locations for bi-directional passage across the Bridgewater Canal, the Manchester Ship Canal and the River Mersey, and (ii) around and through the Town Centre in order to inform the infrastructure requirements associated with proposed residential and business developments.

### ***Failures in Relation to Policy MD2***

1. No factual evidential basis is given for release of the large swathes of green belt land needed to implement Policy MD2.
2. The combination of failures in Policy MD2 and Policy INF2 will unnecessarily and permanently destroy green belt land and would place an unrealistic burden on traffic flow from/to South Warrington to/from the Town Centre and to/from the north side of Warrington Town Centre, in direct contradiction with the objective of stated in Policy INF1 sub-number 1g.
3. The extent of the proposed MD2 development is linked in part to new, local employment developments, the only such development in South Warrington being Policy MD6. Assuming, for example, an average of 1.5 persons requiring employment per new home, the proposed 2,400 new homes (rising to 4,200 beyond the period of the proposed plan) will generate demand for 3,600 jobs (6,300 beyond the period of the plan). It is very unlikely that this number of jobs will be delivered by the proposed new employment developments in Policy MD6, which are likely to be for low-level employment, modern-style distribution centres. Hence, a high proportion of the new jobs required to satisfy the demand from the new homes in Policy MD2 will come from outside of South Warrington and a high proportion of those will require commuting by car, which is in contradiction with many of the principles set out in Policy ENV8 and the national drive for reducing environmental impacts.

# **Response to the Updated Proposed Submission Version Local Plan (September 2021)**

**by Peter Lovell and Valerie Lovell**

## **Statements concerning Form Question B6**

### **Suggestions for Modifications to the Plan**

#### **Alternatives to Development of South Warrington Green Belt**

1. In the 2019 version of Proposed Local Plan, WBC demonstrated incompetence in dismissing any development at the Fiddlers Ferry Power Station location as being too far into the future, despite it being a known fact (when the plan was prepared) that the power station would close in 2020. WBC have now accepted this mistake, but the Updated Local Plan is failing to make the most of that opportunity. Adjacent green belt land on the north side of the A562 between the Fiddlers Ferry development and the existing housing area to the east should be assigned for housing development because it has no significant impact on existing housing in the area and could be integrated within Policy MD3, for which the road link to/from Warrington Town Centre is good and could be enhanced by converting the A562 from single to dual carriageway up to Fiddlers Ferry (which would be easy to do). Furthermore, the nearby location of Widnes Town Centre and its retail parks would be easily accessible for people living in the new homes and would take some traffic flow away from Warrington Town Centre, which can only be good overall.
2. If WBC can provide full justification of the need to release green belt land, then there is a strong argument for greatly reducing the volume of MD2 development by housing development around each of the existing outlying settlements. This would require an overall greater loss of green belt space adjacent to these settlements than set out in the Updated Local Plan, but would have the benefits of: (i) distributing the loss of green belt land so that the impact is not so visible; (ii) distributing across the borough the additional traffic flow from new homes to/from retail parks and Warrington Town Centre; and (iii) reducing or eliminating the need and cost (financial, land use and environmental) of building and operating new schools and local centres.
3. Despite the likelihood of HS2 being in place within the period of the plan, HS2 receives relatively few mentions in the plan. The plan makes no attempt to address the areas in the borough that would receive most direct benefit from HS2, i.e., the east side of the borough, or for transport links from business parks around Warrington to/from HS2. More serious consideration of the implications of HS2 for the borough needs to be given and plans made for developments that will take most advantage of the opportunities.

#### **Traffic Flow from/to South Warrington to/from the North Side of Warrington Town Centre**

4. If the Inspector accepts the MD2 development with the proviso that it is viable only if the road infrastructure for traffic flow from/to South Warrington to/from Warrington Town Centre and to/from the north side of Warrington Town Centre is substantially improved and appropriate for the new size of South Warrington housing, then a major road infrastructure development is necessary to make Policy MD2 viable.
  - 4.1. This road should be a dual carriageway that feeds out of any proposed MD2 development across the Bridgewater Canal and the Manchester Ship Canal and links directly onto the Knutsford Road north of its junction with Wash Lane. The Knutsford Road from Wash Lane to its junction with the Bridgefoot traffic island intersection with the A49 should be made fully dual carriageway with double yellow lines on both carriageways to eliminate restrictions to traffic flow. A link on/off the new road via a roundabout link to Witherwin Avenue would ensure that people currently living in existing homes in South Warrington would make use of the road, thereby relieving much of the existing congestion at the three current crossing points over the Manchester Ship Canal, as well as pinch points for crossing the Bridgewater Canal. It would also provide for movement of goods by lorry to homes and any retail centres and schools proposed in Policy MD2.
  - 4.2. This proposal would inevitably require some compulsory purchasing of properties, but the impact would be justified by elimination of traffic flow issues. It is, however, justified only if the Inspector concludes what is set out in Point 4.