

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: Alan Parkinson

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
Organisation name (if applicable)	-
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	[REDACTED]
Postal Town	[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.

Plan as a whole

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

None of the above

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.

Has failed to adequately meet its statement of community involvement.

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The plan has been prepared using out of date information, identifies some issues but fails to state what those issues are and how they will be addressed, fails to adequately identify the impact on current infrastructure and how it will be improved to accommodate the increased number of houses, traffic and population. The plan suggests that further empirical assessments and investigations will need to be carried out. However, there is no indication that these have taken place or what the outcome of them are.

There is a lack of evidence to show that the Council has engaged constructively with neighbouring authorities and has used relevant information to inform and support its proposals and any subsequent impact on local areas and infrastructure.

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.

In The Statement of Community Involvement (SCI) the Pre-Production Stage - Evidence Gathering section states:

2.1 The council has to maintain up to date information from survey and evidence gathering in order to underpin the preparation of its planning policies and proposals. The monitoring of this information is one of the key indicators of a need to prepare or review a Local Plan document.

It is clear that in formulating the current revised plan Warrington Council has failed to maintain up to date information from survey and evidence gathering in order to underpin the preparation of its planning policies and proposals.

Regarding the Settlement Profiles for the Outlying Settlements published in July 2017 and the Site Assessment Proformas - Site Selection dated 27 November 2018. Some of the information in these documents are inaccurate and/or out of date. Some information provided is vague and there is some lack of consistency between these documents and the Revised Local Plan. There needs to be clear and up to date supporting evidence to underpin the proposals and and show how the impact of the proposals will be addressed and resolved.

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 am be prepared to participate in the oral part of the examination if the Independent Examiner wishes further clarification about the points raised.

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: Alan Parkinson - Response to Local Plan.docx - [REDACTED]

Comments/file description

This document provides full details, explanations and comments of my response to the Revised Local Plan.

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 Revised Local Plan in general and the proposed Winwick settlement development in particular.

The information provided in the 'Warrington Updated Proposed Submission Version Local Plan 2021-2038 dated, September 2021' does not provide the residents of Warrington with clear and precise information to enable them to be fairly consulted on the proposals and in particular on the impact of those proposals. Consequently, the plan, as presented, is not fit for purpose.

In any basic planning process, once a proposal has been made, for example the development of 130 house units to the North of Winwick, Planners must ask the question "So what?" and ask "What are the implications of delivering this proposal on the current infrastructure, access to primary and secondary schools, access to GP Services, access to other primary health care such as Dentists, availability of Public Transport, access to sport, leisure facilities, etc. Once these implications are identified Planners must address each one and show how they are to be resolved. They must then repeat the process asking "So what?" regarding how these implications are to be resolved. This process continues until there are no more "So whats?" to answer. Once this has been done a clear and transparent proposal can be submitted for consultation with clear supporting evidence to show how all implications will be addressed. This is not the case with the 'Warrington Updated Proposed Submission Version Local Plan 2021-2038 dated, September 2021'

The plan has been prepared using out of date information, identifies some issues but fails to state what those issues are and how they will be addressed, fails to adequately identify the impact on current infrastructure and how it will be improved to accommodate the increased number of houses, traffic and population. The plan suggests that further empirical assessments and investigations will need to be carried out. However, there is no indication that these have taken place or what the outcome of them are. How can the people of Warrington, and Winwick in particular, be expected to be fairly consulted on a plan and to give meaningful feedback with so many vague comments, inaccuracies and incomplete information? Consequently, this Plan does not meet the 'tests of soundness'.

In the following paragraphs I will raise issues and provide evidence to support my response.

With regard to the Winwick Settlement Proposals the above points were raised during the 2019 consultation but have not been addressed. In the updated Local Plan Submission Pages 72-73 of Development Options and Site Assessment Technical Report September 2021 uses the exact same wording taken from the 'Overall Site Conclusions based on Suitability, Availability, Achievability' and the 'Workshop Comments' from the Site Assessment Proformas – Site Selection dated 27 November 2018 Job No/Ref 259672-00 [1 SHLAA Ref: 2670 / Site Ref: R18/040] that was used in the 2019 Local Plan consultation.

When speaking with the Planning Officers during the face-to-face consultation at the Halliwell Jones Stadium on 12th October 2021 to ask why there were no revised Site Settlement Proformas with the Revised Local Plan I was informed that the Site Settlement Proformas had not been changed since the consultation in 2019.

During my conversation at the Halliwell Jones consultation event regarding the Updated PSVLP (2021) I asked the Planning Officer about the impact of the proposed Parkside development which is less than 1 mile north of Winwick and the potential impact on local

roads; access to Primary and Secondary Schools; and also about access to GP Services and other Health Care such as Dentists.

In response to the queries that I raised I received by email the following:

- A copy of the Parkside Link Road route is attached;
- In respect of school places, education colleagues consider that existing schools can accommodate the additional pupils that would be generated by the relatively small number of new dwellings proposed in each of the settlements. This is partly because the future birth rates are predicted to fall but also because there are currently children from outside of the borough occupying spaces in school in Warrington that could be prevented from doing so in the future if demand within Warrington increased. In the case of Winwick 130 homes would generate a pupil yield of 5/6 children per year group and there are at least that amount of students in each year group that could be pushed back to their own areas (mainly St Helens in this location). In addition, some children who live in Winwick attend primary school in Croft, which has two primary schools, one of which (St Lewis' Catholic Primary) has significant capacity.

However, there are currently residents in Winwick that have not been able to gain admission to Winwick Primary School for their children. Even though St Lewis' Croft has significant capacity the Admissions Policy for a Catholic School are different and not all parents would want their children to have a Catholic education.

Page 53 of the **Settlement Profiles for the Outlying Settlements published in July 2017** states:

Secondary school provision for Winwick is most likely accessed at Culcheth High School or Beamont Collegiate Academy. Culcheth High School has limited capacity. This is forecast to be used up early in the plan period although capacity may begin to emerge later on in the plan period. There is not any potential for expansion due to site constraints and HSE exclusion zones. Beamont Collegiate Academy currently has limited capacity but is predicted to be at or near capacity and the option to expand if required is limited. However, incremental growth of this scale is likely to be absorbed by the secondary schools without any significant impact. **COMMENT: With very little or no capacity it is not clear how access to secondary schools can be considered to be good with an additional 405 house units proposed of which 200 will be in Culcheth directly opposite Culcheth High School. It is extremely unlikely that the local secondary schools will have sufficient capacity particularly when, in addition, consideration must also be given to the 1200 homes that have been approved on Peel Hall Farm which is situated between Winwick and Beamont Collegiate Academy.**

However, Page 251 of the **Warrington Updated Proposed Submission Version Local Plan 2021 - 2038 September 2021** states:

Community Facilities 6. The development will be required to make a contribution towards the provision of additional primary and secondary school places to meet the need for school places that will be generated from the development. 7. Development will be expected to make a contribution towards the provision of additional primary

care capacity. **COMMENT:** There is no further information about where and when this will be provided particularly as stated above the two designated secondary schools, Culcheth High School and Beamont Collegiate Academy, have little or no capacity for expansion.

On Page 251 of the **Warrington Updated Proposed Submission Version Local Plan 2021 - 2038 September 2021** states:

Open Space and Recreation

8. The development will be required to provide a minimum level of open space in line with the Council's open space standards in accordance with Policy DC5.

9. Proposals will be required to make a contribution to expanding and enhancing existing or planned built leisure facilities and playing pitches that will serve residents of the development.

COMMENT: These statements are extremely vague and do not provide adequate detail with particular regard to built facilities based on the need identified below in the Settlement Profiles. There is no information about what existing provision will be enhanced or expanded or what the planned built facilities are.

Page 52 of the **Settlement Profiles for the Outlying Settlements published in July 2017** states:

Open Space, Sport and Recreation

POS: Winwick has surpluses of most types of open space with the exception of natural/semi-natural green space. In the case of informal open space the surplus is substantial. There is no provision of natural/semi-natural green space at all. In terms of equipped play there are 5 LAPs, 1 LEAP and 1 NEAP.

Sports Pitches: Winwick has a limited range of sports pitches that provide provision for local football teams. However, there are deficits of provision for some types of pitch (rugby league and football junior).

Built facilities: Winwick has a community centre and a recreation ground. Whilst, there is no conventional leisure centre at Winwick (in terms of sports and swimming provision), residents can access a swimming pool/gym etc at the Orford Jubilee Neighbourhood Hub. However, in terms of swimming pool provision this is operating at full capacity.

With Page 53 in the Incremental Growth section of the 2017 profile states:

Open Space, Sport and Recreation Incremental growth would place additional demands on existing open space provision but would not be of sufficient magnitude to require new provision over and above localised provision of open space and children's play areas. Incremental growth would also put pressure on existing sports pitches/facilities but would not be of sufficient magnitude to require new provision.

COMMENT: There is no reference to increased provision of 'Built Facilities' to provide access to swimming pool/gym which as stated above is operating at full capacity.

In addition, Warrington Borough Council has recently announced that the leisure services facilities at Culcheth High School's Community Campus will not re-open after closing at the start of the pandemic. This together with the longstanding work needed for Birchwood Leisure Centre and Library will reduce facilities available to the Winwick, Croft and Culcheth communities.

I did not receive any comment on access to GP Services and other Health Care such as Dentists and sent a further email stating:

You have not responded to my query about access to GP services or other primary health care such as Dentists. In the plan it states " There are some suitability issues due to the distance to GP services and local natural greenspace...." You have not explained what those issues are and how they will be addressed and resolved. The wording used is exactly the same as in the 'Site Selection Settlement Proforma dated 27 November 2018'. In this document it also states in response to the question "What is the overall distance to a GP service or health centre?": 3km - 5km with limited capacity and no potential to expand - 3.1km from Eric Moore Partnership (Orford Jubilee Park Branch) (Capacity is unknown).

The proposed housing development at Peel Hall Farm (1200 units), situated north of Orford and between Winwick and The Orford Jubilee Park Branch, will add further issues to providing adequate GP health care services for the people living in Winwick.

Since writing the above email on 21 October, on 9 November 2021 the go-ahead was given to proceed with the 1200 house units at Peel Hall Farm! This will add significantly to traffic flow on local roads in North Warrington. However, no detail is provided on the access to and from the site, the impact on the current infrastructure road network and how this will be addressed.

Following a telephone conversation with the Planning Officer we discussed the population of Winwick and I queried why the Winwick Park development was not included within the Winwick boundary on the maps provided and the issues about access to GP services and Health care. I was informed that the Winwick Park development, that has been there for many years, remains in Green Belt Land and is therefore outside of the Winwick Boundary. This suggests that Winwick has already 'lost' a significant amount of Green Belt Land for residential housing.

I requested a written emailed response and received the following comments by email:

Firstly, in terms of the population of Winwick that has been used in assessment of the impact of the proposed allocation site this is contained in **the Settlement Profiles for the Outlying Settlements published in July 2017**. Page 51 of the document indicates the estimated population of Winwick (including Winwick Park) as 1,954. The 2.35 is the average household size for Warrington and the 96% is the occupancy rate of properties (ie 4% are estimated to be vacant at any one time).

In terms of the issue of health care provision both of the Winwick (OS6) and Peel Hall (MD4) allocation policies require financial contributions towards the provision of additional primary care capacity based on advice from the CCG. The CCG have previously indicated that they are satisfied that provision can be accommodated in the

area. Please refer to the comments in respect of Health Facility Implications in the Incremental Growth scenario (Page 52 of the Settlement Profiles document referenced above).

It is not clear whether the advice from CCG has taken account of the 405 house units being proposed across the outlying settlements of Winwick, Croft and Culcheth and the 1200 house development at Peel Hall Farm that has recently been given planning approval.

Page 52 of the **Settlement Profiles for the Outlying Settlements published in July 2017** states:

There are currently no GP Surgeries in Winwick but incremental growth of this scale could be absorbed by existing facilities in the main urban area of Warrington. Depending on growth elsewhere in this part of the borough, this may cumulatively result in capacity issues which could require an expansion of existing facilities.

The '**Site Selection Settlement Proforma dated 27 November 2018**' states that the overall distance to a GP service or health centre is 3km - 5km with limited capacity and no potential to expand and the capacity of the Eric Moore Partnership at 3.1km away (Orford Jubilee Park Branch) is unknown.

The maps for the Croft and Culcheth Profiles on pages 11 and 19 respectively show two GP surgeries and two Dentists in Culcheth. **COMMENT: These maps are out of date. This information is misleading and/or inaccurate. There is now only one Medical Centre in Culcheth and that has no more capacity. Of the two Dentists only one is NHS which has no further capacity with the other being a Private Dental Practice. There are no GP surgeries or Dentists in Winwick or Croft.**

The information and comments in the consultation documents are vague and do not provide for clear and effective consultation.

The Infrastructure Delivery Plan (IDP) 2021 shows that for North Warrington covering Winwick, Croft and Culcheth:

Social – Health: No scheduled improvements for North Warrington. **COMMENT: How can this be the case when there are proposals to build 405 new homes and existing GP Services and Health Care are insufficient in the local areas?**

Although Warrington Council will have consulted with neighbouring Local Authorities there is no evidence to suggest that Planning Officers have taken into account the housing already being built to the North of Winwick in St Helens and Wigan Local Authorities. This includes 453 house units in Golborne, 481 in Lowton and 666 in Newton-le-Willows giving a total of 1400 house units. This will add significant increase in traffic along the A49, A573 (Golborne Road) and the A579 leading on to the A49 (Winwick Link Road).

In addition to the above, on 11 November the first phase of the regeneration of the former Parkside Colliery Site has been given the go-ahead by the Secretary of State Michael Gove.

This project in Newton-le-Willows, is less than one mile North of Winwick and is expected to bring almost 500 jobs during the construction phase and the potential of more than 1,300 new

jobs in the completed buildings. The announcement approving the Parkside development also saw approval of the Parkside Link Road which aims to keep traffic, specifically Heavy Goods Vehicles (HGV), clear of Winwick. However, the access and egress from Parkside Colliery will be on to the A573 which will allow vehicles to travel through Winwick village. HGV leaving the site will continue across the new junction with the A573 along the Parkside Link Road on to the A579. It is expected that these vehicles will turn South towards Junction 22 of the M6. However, HGV's travelling to Liverpool are more likely to continue across Junction 22 of the M6 on to the Winwick Link Road that will merge with the A49 at the southern boundary of Winwick and approximately 250 metres South of the junction of the where the A573 meets the A49. This will significantly increase the volume of traffic travelling through Winwick on the A49, A573 and Winwick Link Road.

Page 52 of the **Settlement Profiles for the Outlying Settlements published in July 2017** indicates that with regards to the Local Highways Network there is some peak hour congestion in centre of village and in vicinity of A49. No planned local highways improvements in village.

Page 53 on Incremental Growth states:

Local Road Network: Incremental housing growth would cause a marginal increase in traffic levels and delays on existing links and junctions from the current levels. Further empirical investigation would be required to confirm the exact nature of the traffic growth impacts. **COMMENT: There is no indication that this has taken place or what the outcome of the investigation is.**

Strategic Road Network: Incremental growth could lead to a marginal increase in traffic levels and delays at M62 J9 and M6 J22. This would require further empirical assessment by Highways England to gauge the exact level of the impact on the SRN. **COMMENT: There is no indication that this has taken place or what the outcome of the investigation is. This will also need to include the Parkside Link Road that has recently been given approval.**

Page 543 of the **Site Assessment Proformas – Site Selection dated 27 November 2018 Job No/Ref 259672-00 [1 SHLAA Ref: 2670 / Site Ref: R18/040]** states:

Is there a physical point of highway access into the site? Access can be created within the site – from A49 or Waterworks Lane. **COMMENT: This is incorrect! The road referred to should be the A573 not the A49**

The Infrastructure Delivery Plan (IDP) 2021 shows that for North Warrington covering Winwick, Croft and Culcheth:

Transport - Local Road Network - Warrington North Pinchpoints (A49 corridor) Inner Warrington/ North Warrington. However, this is identified as 'Concept Only' with LTP4 recommending 'study work required'. **COMMENT: The plan does not identify where these pinchpoints are or how they will be addressed.**

Page 52 of the **Settlement Profiles for the Outlying Settlements published in July 2017** states:

Public Transport: Winwick has the following main bus services No. 19 Service (Half Hourly) – Warrington to Leigh. **COMMENT: This is incorrect. The No. 19 service is Hourly NOT Half Hourly.**

Page 53 states that: Public Transport - Incremental growth would only create a marginal increase in the potential market for the local bus services serving this area. It is unlikely that a gradual increase in bus travel demand under this scenario would be sufficient to support a new service. However a strategy to encourage modal shift from car to bus will be in place and could be supported with appropriate bus priority measures and bus passenger facilities. **COMMENT: The No. 19 Service provides a very limited service to the people of Winwick. For example, the service from Winwick to Warrington operates hourly from Winwick between 07:04 and 19:20 Monday-Friday; between 09:04 and 17:04 on Saturday; and between 09:37 and 17:32 on Sunday. The hourly service from Warrington to Winwick arrives at Winwick between 09:25 and 18:44 Monday-Friday; between 08:16 and on 18:19 Saturday; and between 09:04 and 17:00 on Sunday. These timings make it difficult for some reasons to use public transport to an dfrom their place of work and gives no time for residents to travel to Warrington for the evening and return to Winwick.**

Page 544 of the **Site Assessment Proformas – Site Selection dated 27 November 2018** states:

How well served is the site by a bus service? Low frequency bus service within 200m
Regular bus service within 200m-400m – 276.3m from the nearest bus stop.
COMMENT: No further details are given.

Page 251 of the **Warrington Updated Proposed Submission Version Local Plan 2021 - 2038 September 2021** states:

10.11.1 Land to the north of Winwick between Golborne Road (A573) and Waterworks Lane will be allocated for residential development, providing a minimum of 130 new homes. The development will provide a high quality residential setting with ease of access to existing local services and facilities in Winwick and employment opportunities at Omega/Gemini/Winwick Quay. **COMMENT: There is no public transport service from Winwick to Omega and Gemini.**

Page 252: Transport and accessibility 14. A package of transport improvements will be required to support the development. Required improvements will include: a. Ensuring appropriate access arrangements for the site. b. Provision of cycling and walking routes within the site to connect into the wider existing footway network to the south and provide connectivity with the existing community. c. Other necessary network improvements as identified by an appropriate Transport Assessment. 15. Good accessibility to public transport services should be provided by ensuring that the bus routes and bus stops on Newton Road (A49) and Myddleton Lane are accessible by pedestrians. **COMMENT: It has already been stated that the current bus service is inadequate to meet the needs of residents.**

Page 544 and 545 of the **Site Assessment Proformas – Site Selection dated 27 November 2018** states for the proposed Winwick development site that:

Site is potentially contaminated but may be difficult to remediate

Site predominantly within flood zone 1 (>70%)

There are electricity pylons running across the site.

The site has good accessibility to formal play space, and primary and secondary schools.

There is a small section of potentially contaminated land in the north eastern corner and a section of historic landfill site 250m buffer zone in the south western corner of the site, and therefore, there are known abnormal development costs.

COMMENT: Evidence suggests that accessibility to primary and secondary is not good!

There is no information about how large the contamination and landfill buffer zone sections are. Although it has not been included in the Site Assessment Proformas 2018 or the Site Settlement Profile dated 2017 there are water supply pipes underground on the proposed site that connect to the Winwick Service Reservoir on Waterworks Lane.

In the **Statement of Community Involvement (SCI)** the Pre-Production Stage - Evidence Gathering section states:

2.1 The council has to maintain up to date information from survey and evidence gathering in order to underpin the preparation of its planning policies and proposals. The monitoring of this information is one of the key indicators of a need to prepare or review a Local Plan document.

COMMENT: It is clear that in formulating the current revised plan Warrington Council has failed to maintain up to date information from survey and evidence gathering in order to underpin the preparation of its planning policies and proposals.

Summary Statement

From the evidence I have cited above it is, in my opinion, clear that the 'Warrington Updated Proposed Submission Version Local Plan 2021-2038 dated, September 2021' does not meet the 'tests of soundness'.

For the residents of Winwick in particular, and Warrington in general, the consultation process does not provide an appropriate opportunity to give meaningful and effective feedback on the proposals. As demonstrated in this response, there are vague statements or comments, use of inaccurate and/or out of date information on the settlement profiles. There is a total lack of clear evidence and adequate information about the impact of the proposals on the current infrastructure and how these will be addressed and resolved.

Alan Parkinson



Submitted: 14 November 2021