

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: Stanley Henry-Dormer

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		
Sound		X
Compliant with the Duty to Co-operate		

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 plan fails to meet the requirements for: 1) Dealing with traffic, congestion, and toxic pollution, 2) Dealing with moving from motor vehicles to other forms of transport, 3) Dealing with the construction of new homes, 4) Dealing with the Greenbelt and its protection, 5) Dealing with Nature, Natural Diversity and Human Welfare.

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 needs significant revision to make it sound. I have provided full details of areas that are unsound and fail to deliver an adequate strategy within the Local Plan. As these are somewhat detailed, I have provided a separate document as an attachment to this submission.

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:

Because key elements of future strategy are missing or have been ignored in developing the plan.

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: Warrington Local Plan.pdf - [REDACTED]

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**)

To: **Warrington Borough Council**

From: **Stanley Henry-Dormer**

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Date: **14th November 2021**

The revised local plan is not sound or deliverable due to:

1: Traffic, congestion, and toxic pollution

The infrastructure in South Warrington including Stockton Heath and adjacent villages and connections to central Warrington is poor and deteriorating. There is motor traffic congestion throughout the working day but particularly appalling congestion at work times and school-run times.

This means that air pollution is high at those times, affecting the welfare of those living in and passing through the area including the health of vulnerable children that live in the Borough.

Cheshire Police in **October 2020** reported that within the Cheshire area that road deaths had doubled in a period of twelve months despite COVID and lockdowns. Increasing congestion caused by new home building is certain to be followed by increasing traffic flows that lead to further accidents, injuries, and deaths.

The Chester Rd to Wilson Patten St cross canal link has, as was predicted, increased congestion at the junction of Walton and Chester Rd at Stockton Heath. This has become a local shortcut for people who want to avoid Stockton Heath and now results in heavy traffic congestion at Slutcher's Lane and Wilson Patten Street blocking access to the town centre and Warrington Bank Quay railway station.

Over the last few years, the actions, whether intended or not, of Warrington Borough council have been to encourage out of town shopping and to encourage out of town employment and these things taken together with recent town centre development and the notorious difficulties of crossing the river at Bridgefoot have led to appalling congestion during most of the working day but particular the astonishing difficulty of traversing the river at the beginning and end of the working day.

COP 26 has a fundamental principle of decarbonizing and reducing atmospheric pollution, so the building of further homes and the permanent destruction of Greenbelt does nothing to support COP 26 but in contrast operates in the opposite direction of which COP 26 is pointing. Thus, the plan is not delivering on the commitment made by the UK Government.

In the Centre for Cities pollution survey of 2020 Warrington is shown as one of the Boroughs with the highest CO2 emissions per capita and in the matter of toxic NO and particulate production (PM2.5) Warrington has the highest emissions per 10,000 inhabitants. These figures exceed the values found in the major cities of Liverpool, Manchester and London.

There is clearly something already seriously wrong with the air quality, traffic flows and routing in Warrington. Children, the elderly, and those that suffer from respiratory diseases are at risk.

Warrington borough council should recognise that a coroner has made legal history by ruling that air pollution was a cause of the death of a nine-year-old girl. Philip Barlow, the inner-south London coroner, said: 'Ella Kissi-Debrah's death in February 2013 was caused by acute respiratory failure, severe asthma, and air pollution exposure. He said she was exposed to nitrogen dioxide and particulate matter (PM) pollution in excess of World Health Organization guidelines, the principal source of which were traffic emissions. The coroner said the failure to reduce pollution levels to legal limits possibly contributed to her death.'

The building of new homes and the introduction of new vehicles into the area can only further worsen Warrington's toxic gas figures and there is a growing belief that in the future mass action, such as that already taken by the organisation ClientEarth, may be taken against councils that do nothing to abate the problem, particularly when it is within their control.

There is an opportunity here within the local plan for Warrington to become a leader in re-planning infrastructure with deliberate emphasis on the reduction of vehicle traffic and motor generated pollution. However, the plan does not conform or comply with COP 26 principles of decarbonisation. Thus, the plan is not sound.

2: Moving from motor vehicles to other forms of transport.

The cycle lanes provision in and around Warrington, and particularly those in the southern part of Warrington are particularly poor, most lanes being narrow and some lanes being short and terminating in traffic build up areas. Vehicles are often seen stopped or even parked in cycle ways.

Multiple vehicle ownership in areas of traditional terraced housing has compounded the problem with vehicle owners parking on roads blocking cycleways and paths. Current housing density and out of town employment exacerbates this problem forcing homeowners to own multiple vehicles to allow them to commute to work and abandon any thought of walking or cycling to work.

There is nothing in the current development plan that gives rise to any hope for householders to be able to abandon their vehicles and transfer to other forms of transport. For example, bus schedules are so infrequent in many parts of the southern region of Warrington as to be almost laughable. The steepness of the terrain and the and the congestion on roads are huge deterrents to anybody of normal working age being able to cycle to work.

Many people who drive to work or attend higher education, and that live in Southern Warrington are driving in excess of 10 miles to their place of work or study, including commuting to the major cities of Manchester and Liverpool, and it would not be possible for the vast majority of these people to be able to transfer to other forms of transport, in particular because the bus services and the rail services that connect Warrington to adjacent towns and cities are not synchronised or affordable.

New build housing is designated in areas where public transport services are already poor and there is no provision in the plan for improving public services and assisting motorists to abandon vehicle journeys. The reality is that the current local plan will increase the number of people that take to vehicles to get to work.

Warrington should lead the way by saying 'no' to more building and 'yes' to more affordable, green transport that is synchronised to common destinations. The plan contains only a wish list, a proposal, that once population increases are factored in represents an increase in the amount of current vehicle travel, and no coherent strategy on achieving motor free access to employment, education, or the ability to use alternative forms of transport such as walking or cycling. Thus, the plan is not sound or deliverable.

3: Construction of new homes

Whilst the revised development plan awaits public reaction before it's considered by the Cabinet the local area is already being adversely impacted by new developments such as King's Quarter and St.

Saviours Place where 3- 4- and 5-bedroom Executive houses, hardly what the average long-term resident of the Borough would consider affordable, dominate the landscape with a few smaller homes thrown in as a token gesture to affordability.

Overall, the population is ageing and yet the number of new homes being constructed as bungalows or one- or two-bedroom homes are in the minority, as these homes offer less profit to the developer, and this works in the opposite direction of population age profile changes.

Warrington's plan should deter builders from building yet more executive homes or allowing builders to acquire smaller homes such as bungalows and rebuild them as massive 2000 to 4000 square foot executive homes. The current activity runs contrary to common sense and forces young buyers and those that retire out of the area and contributes to the building of structures which emit more carbon in violation of the direction endorsed by COP 26.

Warrington Borough should lead the development plan by requiring a lower housing density, greater distribution of homes geographically, and smaller home footprints, the building of a greater variety of homes including one- and two- bedroom homes and setting demanding standards for insulation and carbon reduction for each new structure built.

Additionally, the preservation of trees, greenspace and local species must be taken into account for the new homeowners and mandated on developers to avoid purchasers of homes being consigned to yet another concrete jungle as already exist in some parts of the Southern Borough.

The local plan as proposed contains no viable connections between economic growth and the requirements for housing. Housing planning and development takes no account of the requirement to move to a net-zero carbon future. Thus, the plan is not sound.

4: Greenbelt and its protection

It is of enormous concern and great sadness that Warrington Borough Council is proposing to destroy and remove green belt from the southern part of the borough. This action will be irreversible and detrimental to everyone that lives within the borough and is unforgivable.

Not only will the concreting over of Greenbelt lead to harm in the future with current climate change prediction models for the North-West showing increased flooding and damage to homes, the costs of remediating such damage will be borne by the householder and could have been avoided by spreading new build homes, in smaller groups, over a much wider area taking advantage of grey and brownfield sites and building with appropriate green protection on those sites to assist water drainage.

Moreover, the recent creation of a border facility in Southern Warrington adjacent to the M56/M6 motorway and the increased area committed to logistics and warehousing development will further exacerbate the problem of water drainage and runoff, highway rubbish dumping, and, even more seriously than that, the congestion and pollution of the urban road system. It goes without saying that these increased industrial facilities will in turn lead to more accidents and because of toxic pollution bring harm to any residents in nearby conurbations.

It is familiar to those that live and in the surrounding areas of Warrington that people who travel from South of the country to the Warrington area are pleasantly surprised by the amount of green belt that surrounds what they thought was an industrial town. It's therefore of critical importance to Warrington's future as a destination for investors, employers, and residents that the maximum amount of Greenbelt is conserved and the absolute minimum amount of land taken for house building or industrial estates is allowed to be drawn from Greenbelt irreplaceable resources.

On this basis alone, the Local Development plan should abandon any idea of destroying the unique Greenbelt that exists in this area. It will be to the overall detriment of the Borough. The plan fails to connect to current climate predictive models. Thus, the plan is not sound.

5: Nature, Natural Diversity and Human Welfare

The green belt that surrounds Warrington particularly the southern region of Warrington, is home to a surprising diversity of plants, animals, and other creatures such as insects.

The Natural History Museum, this year, has stated: 'Centuries of farming, building and industry have made the UK one of the most nature-depleted countries in Europe. Extensive road networks, in combination with other factors, have reduced the wildlife in the UK to a point hardly seen elsewhere.'

While the UK has made some gains, natural landscapes have been so heavily degraded over decades and centuries that we are simply not doing enough to turn back the tide.'

Further research shows that: 'The world's overall biodiversity intactness is estimated at 75%, which is significantly lower than the 90% average considered to be a safe limit for ensuring the planet does not tip into an ecological recession that could result in widespread starvation.'

On this scale, the UK's index reading was 53%. Not surprisingly this has left dozens of species hovering on the brink of extinction.'

It is about time that Warrington realised that the concreting over of large areas of Greenbelt due to new housing and industrial estates is not just about the loss of 'a nice green view' but is a direct contributor to diversity destruction that in turn will lead to harm for the population of this area.

The New Scientist in March 2021 reported: 'Urban planners down the ages have taken inspiration from nature. And those of us living in the concrete and brick jungle have perhaps never appreciated scraps of green space more than during the Covid-19 pandemic. During lockdowns, city dwellers across the world have found parks and gardens – where they exist - an unexpected source of calm.'

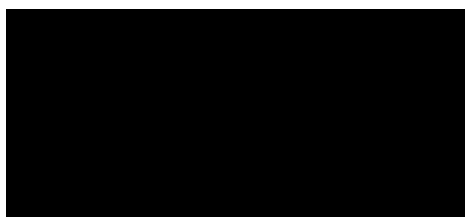
That comes as no surprise to the growing number of psychologists and ecologists studying the effects of nature on people's mental health and well-being. The links they are uncovering are complex, and not yet fully understood. But even as the pandemic has highlighted them, it has also exposed that, in an increasingly urbanised world, our access to nature is dwindling – and often the most socio-economically deprived people face the biggest barriers. Amid talk about building back better, there is an obvious win-win-win here. Understand how to green the world's urban spaces the right way and it can boost human well-being; help redress social inequality and be a boon for the biodiversity we all depend on.'

Warrington has a unique opportunity to become a leader in this area, and to follow the principles alluded to in the COP 15 October 2021 Convention on Biological Diversity that deal with the fair and equitable sharing of benefits from the use of nature.

The current plan will lead to the destruction of natural resources, not support and protect them in a fair and equitable manner as is demanded by COP 15.

The current plan provides limited protection to a short list of named species only and fails to protect biodiversity as a whole. Thus, the plan is not sound.

Yours sincerely



Stanley Henry-Dormer