

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: Alistair Briggs

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)	Alistair Briggs
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.

The Plan is not legally compliant because it:

- does not demonstrate sufficient planning for the sustainability appraisal (including consultation with the statutory environment consultation bodies)
- does not identify significant cross boundary and inter-authority issues
- does not ensure that the plan rests on a credible evidence base

The Plan is not sound because:

- It is not positively prepared – it does not provide an acceptable strategy because the area's objectively assessed needs are incorrect
- It is not justified – it is not an appropriate strategy, does not take into account the reasonable alternatives, and is not based on proportionate evidence
- It is not effective – there is no evidence to support the notion that it is deliverable over the plan period

The Plan is not compliant with the duty to Co-operate because:

- It does not demonstrate that social, environmental and economic issues have been addressed effectively by working with other local planning authorities beyond the Warrington administrative boundaries.

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.

Modifications I consider necessary to make the Plan legally compliant and sound:

- Address the issues I have noted regarding legal non-compliance and soundness
- Listen and act on the points that are continually being raised as critical by local residents
- Understand and incorporate in a realistic manner issues associated with national / international climate targets, pollution and protecting the flora and fauna so important to maintaining our diverse habitat.

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

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: 14.11.21 Document supporting Response to Local Plan.docx - [REDACTED]

Comments/file description

This file titled Document supporting response to Local Plan contains additional relevant comments where the Plan is deficient.

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)**

Document supporting my representation form

I believe the Updated Proposed Submission Version of the Local Plan is not sound. The Plan fails to meet the soundness tests against which it is judged, namely:

- It is not positively prepared – it does not provide an acceptable strategy because the area’s objectively assessed needs are incorrect
- It is not justified – it is not an appropriate strategy, does not take into account the reasonable alternatives, and is not based on proportionate evidence
- It is not effective – there is no evidence to support the notion that it is deliverable over the plan period

Furthermore,

1. There is no justification for the predicted growth in the Plan, and no evidence presented to support the figures.
2. There is no evidence or justification for the proposed volume of housing, no detail as to how the proposed housing figures for the identified regions have been arrived at. Nor is there any programme that shows when the discreet areas identified will be developed which could be used to show that green belt land would only be used as a last resort towards the end of the Plan if absolutely necessary. Instead recent developments show the opposite is happening ie using green belt first because it is an easy and attractive option for developers.
3. There is no justification for the mass of employment land. Nearby Parkhurst Colliery development has been granted a £38M transport link, there is no evidence that developments such as this close to Warrington have been considered in arriving at employment growth figures.
4. There is no justification for the scale of green belt release. Recent developments have been approved on green belt land at Grappenhall Heys and Appleton Cross in advance of approval or otherwise of this Local Plan. Green belt lost for these developments is in addition to the 5% mentioned in the Plan. Using figures from the Plan, release of 580 hectares of green belt with a minimum housing density of 30 dph equates to 17400 homes. Or alternatively, 4372 homes in 580 hectares equates to less than 8dph.
5. Areas of Green Belt in the Plan have been classed as “weak”, “moderate” etc with no evidence to support the classification. These have then been used to justify taking those areas for development.
6. Recent ad hoc approvals at Grappenhall Heys and Appleton Cross now appear to be used by planners to justify “filling in the gaps”.
7. The Plan continually refers to items being “sustainable”. This does not extend to Green Belt land, which until now has been quite capable of self sustaining for thousands of years and will now be destroyed.
8. There is no need to create the harm to our air quality and local ecology. There is no realistic assessment of the number of car journeys and associated pollution that the Plan will create, nor details of how the flora and fauna in areas of green belt identified for development will be affected and supported ie maintained in a “sustainable” manner.

9. There is no need to destroy the landscape and character of our villages and settlements. What were once discreet settlements are now shown as being swallowed up by new housing areas in the proposed Plan, in direct contravention of some of the noted key objectives.
10. There is no clarity on the means of delivery. There is no clear programme, and no evidence that vital infrastructure and services will be provided in advance of housing and employment development. To date the exact opposite has been the case.
11. There is no explanation of how the already strained infrastructure can cope with the proposed levels of development. There appears clear evidence that the increased use of cycling as a form of commuter transport during the last year or so of lockdown etc has not proved "sustainable" once bad weather and darkness arrived. Increasing reliance on road traffic is inconsistent with UK Climate Change aspirations.