

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: Christopher John Marshall

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	-
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		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.

See attached document.

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.

See attached document.

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: UPSV 2021 Response.docx - [REDACTED]

Comments/file description

Comments detailing all my concerns and comments on the Draft Local Plan 2021.

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 Updated Proposed Submission Version Local Plan November 2021

Introduction

I wish to register my concerns with the updated local plan but am finding it too difficult to fit them into the structure provided by the official representation form so I've put together this document that details them. Hopefully this is acceptable. In the broadest terms my concerns relate to the soundness of the plan and (to a small degree) the duty to cooperate. I'll start by discussing my concerns with the plan at an overall level before going on to discuss some specific concerns regarding Lymm [REDACTED]. Some of the latter points may generalize to the other outlying settlements so please consider that when reading them.

Comments on overall aims and objectives

Ever since the PDO consultation I've been very concerned about the amount of Green Belt land which will be lost under the proposals. I recognize and welcome the changes to the plan since 2019 which reduce the amount of land to be removed from Green Belt from 11% to 5% of the total. Even the reduced amount is still a substantial amount of lost green space though and the long term effect concerns me. I continue to urge the Council to try to find ways to reduce this further if at all possible.

I welcome the reduction to the housing target since the 2019 proposals and I can see that the proposals are much closer to the minimum that the government's housing needs methodology seems to allow. Whilst I understand that central government seems to require them, I'm concerned about the fact that the target is based on 2014 projections for housing demand. In 2019 it was clear that 2016 projections would suggest a lower target and in the post Brexit, post Covid UK of 2021 the 2014 figures seem to be out of date and unrealistically high. From what I can gather from the news (particularly recent speeches from the Prime Minister) ministers seem to be becoming increasingly keen to avoid building on Green Belt land. In front of the Housing, Communities and Local Government Committee last Monday (8th November) Housing Secretary Michael Gove also recognized the problem of out of date projections and made it clear that Councils could push back against central government targets. Given this I'd urge you to at least discuss the possibility of using a target based on more recent projections with central government.

As far as employment land is concerned I recognize and welcome your recent efforts to develop your own projections for economic growth rather than simply using (inevitably optimistic) figures from local business groups. I'm still concerned however by the elements of the plan that focus on land for logistics and distribution businesses. These require large amounts of land, place heavy demand on the road system and generate relatively few jobs most of which are quite low paid. Now that Warrington has reached the point where it is having to release land from Green Belt to accommodate economic growth I'm very sceptical that the benefits of having any more such businesses here outweigh the costs. Given the availability of sites for logistics and distribution in Runcorn and St Helens and the ongoing construction of many more in Carrington I'm also unconvinced there would be sufficient demand in the longer term.

Comments on large scale aspects of the plan

Firstly I recognize and welcome the inclusion of the Fiddler's Ferry site in the Plan and the reduction in scale of development from replacing the previous Garden Suburb plan with the South East Warrington Urban Extension. This balances things out a bit between the West and East of Warrington though the plans still skew too heavily to the South of the borough in my opinion.

Following on from my comments above I'm disappointed that the South East Warrington Employment area plans remain largely unchanged. I've already expressed my reservations regarding sacrificing Green Belt for logistics and distribution. I'd urge you to look at this again and consider whether a smaller development focussed on different types of businesses – a science park maybe – would deliver greater benefits for Warrington with less costs.

Comments on proposals for Lymm

I welcome the reduction in number of houses to be built on (released) Green Belt land in Lymm resulting from the removal of the Massey Brook Lane site from the plan though I'm disappointed that given the ability to reduce the amount of Green Belt release over Warrington as a whole there was no general reduction in the allocations to the outlying settlements. At the very least please hold firm against any pressure to increase the number of houses in Lymm again.

I remain extremely concerned about the proposed timescales for development in Lymm. Concentrating all the development at the start of the plan period will considerably exacerbate the difficulties of accommodating the infrastructure requirements of the new developments.

The PDO settlement profiles document showed that Lymm's GP surgeries are at capacity, primary schools are near capacity, the secondary school is at capacity and there are also likely capacity issues with the Leisure Centre and Dentists. Since then the situation with GP surgeries in Lymm has worsened considerably. I know from personal experience that Brookfield Surgery has been struggling for some time. From recent discussions on local social media groups it sounds like the situation at Lakeside is even worse. Both surgeries have been resorting to a variety of desperate 'tricks' to try to force people onto other NHS services to try to reduce their workload. Whilst I don't have numbers, given there has been continued housebuilding in Lymm over the last few years I would expect the other services to also have even less capacity than they did in 2016.

In my previous consultation responses I mentioned that I'm concerned that concentrating the new house building in Lymm into the first part of the plan period could cause unnecessary pressure on local schools. In my experience a very common reason for people moving to Lymm is because they have young children and consider it a good place to bring them up. From what I heard at one of the previous consultation events I believe a standard figure was used to estimate primary school demand which does not take this in to account. I fear that the new houses will result in a bulge in demand for primary school places in the short term for which there will not be enough time to make accommodations. This would then be followed by a bulge in demand for high school places a few years later. The overall effect of this is that the schools will need to provide greater capacity than if the same number of new houses was spread out evenly over the plan period.

In my opinion, due to the current GP situation, the plan needs to make provision for getting the proposed new Medical Centre in Lymm up and running before any of the new houses proposed are occupied. I also ask that you give serious thought to measures to spread the proposed development

more evenly over the plan period to reduce pressure on schools and allow more time to identify and resolve any other infrastructure issues before they become critical. A smoother flow of new houses into the local housing market would also reduce any risk to deliverability from short term oversupply. To my mind the simplest way to do this would be to delay allowing development of the Pool Lane/Warrington Road site until the second half of the plan period.

I also want to repeat my concerns from previous consultation responses regarding affordable homes in Lymm. It's clear that there is a need for affordable homes in Lymm and I support the requirement for 30% affordable homes proposed – indeed I can see a case for an even higher proportion. I don't however think the 2/3 to 1/3 ratio of rental to ownership is right for Lymm. I have some personal/family experience of the housing market in Lymm. Relative to other areas house prices here are high but this is much less the case for rents. In my opinion a better mix would be for 2/3 to 1/3 of the affordable homes in Lymm to be for ownership. Perhaps the best option would be to delegate the decision on the affordable rental to ownership ratio to Lymm Neighbourhood Plan. This seems like the sort of decision that a Neighbourhood Plan would be well placed to address.

Comments on travel and transport proposals

I'm concerned at some elements of policy INF1 (particularly principles 1d and 1e) that appear to be aimed at reducing car use in Warrington. In Lymm (and I assume the other outlying settlements) public transport provision is completely inadequate for most journeys especially commuting to workplaces outside Lymm (the norm). Cars are therefore much more of a necessity here than may be the case in other parts of Warrington. I think that policy INF1 therefore should include a commitment not to disadvantage the residents in the outlying settlements and other areas where car use is the only viable transport option.

Conclusion

To summarize then I welcome the changes made to the plan since the 2019 consultation though I remain unhappy about what is still a large loss of Warrington's Green Belt land. I urge the council to continue to try to reduce this by looking again at the housing target and by reconsidering whether allocating such a large amount of land to logistics and distribution is really in Warrington's best interests.

For Lymm I remain very concerned about the size and compressed timetable for development and its impact on local infrastructure, particularly GP services and schools. I request that the timetable is spread out to ease infrastructure pressure and also that some changes are made to the proposals for affordable housing to better suit Lymm's specific case.

I also have some minor concerns regarding policies around car use.

In terms of the review process I consider these concerns to fall under the soundness of the plan and (in a few cases) with compliance with the duty to cooperate.