

# 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:** Jon Middleton

**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>	-
<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

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
<b>Legally Compliant</b>		
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>		

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 should not be progressed given the government's latest announcements and Michael Gove's comments regarding the protection of the greenbelt and the ending of housing targets.
- The plan sacrifices the pleasant green spaces of South Warrington for no valid reasons, it is harmful to the environment, unsustainable in the context of the climate emergency, unjustified when looking at the 2018 ONS data, detrimental to the plans of developing the town centre, detrimental to the remediation and improvement of brown field land, contrary to the maintenance of distinctive and separate villages, woefully inadequate in terms of infrastructure to support in particular the greenbelt development, woefully inadequate in terms of concrete proposals for the funding of infrastructure and services. The plan appears to have one purpose which is the unjustified and premature release of greenbelt. A greenbelt that should be protected for the future generations of people living in Warrington able to enjoy the green spaces the people of Warrington enjoyed today.
- The Council have declared a climate emergency, the release of greenbelt is not sound in the face of the Council's own climate emergency, the governments own declaration of a climate emergency and the global desire to reduce greenhouse gas emissions.
- When Brownfield land is available for use there is no sustainable justification for the release of greenbelt land on the outskirts of the town. The release of greenbelt in the countryside surrounding the town and in particular the South East Urban Extension will create further car dependent suburbs, leading to further congestion, pollution and negatively impacting the climate change agenda of the Town and the Country.
- The release of greenbelt for the building of the South East Urban extension is not sound and unsustainable given the context of a climate emergency.
- The South East Urban Extension has no provision for any form of mass transport other than the motor-vehicle and vague promises of public transport systems. The topography of the area that is earmarked for the South East Urban Extension makes realistic alternative to the car almost impossible for journeys to and from the town or journeys to work.
- The residents of the South East Urban Extension because of the three water barriers to the town centre and the heavily congested road network leading to Warrington will be inclined to look for leisure and retail activities in, Manchester, Liverpool, Chester, Northwich and Cheshire Oaks all of which offer much more than the facilities in Warrington Town centre and are only a relatively short journey time away.
- The plan is not sound in that it fails to address the already chronically overloaded road system in South Warrington. The bottlenecks of Stockton Heath, Latchford, junction 10 of the M56, Junction 20 of the M6, and London Road between Stockton Heath and junction 10 of the M56.
- The limited contribution to the road network contained within the plan for the South East Urban Extension is a link road from Grappenhall Hayes to Dipping Brook Avenue with a connection to the existing road network near Grappenhall Lane and a connection of a link road from Stretton Road to the A49 somewhere opposite the Spire Hospital. These do not address any of the current issues of congestion rather it simply links areas within the already congested hinterland bounded by The Bridgewater Canal, the M6, the M56 and London Road.
- Specifically there are no concrete plans to address the junction at Lyons Lane and the A49, or the Owens corner roundabout on to the A49, both of which, if these plans were to go ahead, would see significant additional traffic flows and further congestion.
- The proposed new junction opposite the Spire Hospital has enormous potential drawbacks. If this is to be operated by traffic lights it would create a further worsening of the congestion that already sees vehicles backing up to the junction 10 of the M56. The implications of having traffic lights opposite the Spire and at the Cat and Lion will only increase the congestion on the A49 both northbound and southbound.
- The proposal that in the short term there is a potential to link the A49 opposite the Spire to Spark Hall close, is practically unworkable and creates significant congestion at the junction of Stretton Road and

Spark Hall close opposite Saint Matthews Church and Saint Matthews school.

- The separation of the South East Urban Extension from the town of Warrington is exacerbated by the lack of the creation of any new crossings over the Bridgewater Canal, The Manchester ship Canal and the Mersey in this area of Warrington.

- The Plan refers to an annual "target", may I remind you that, Christopher Pincher MP (Housing Minister) in parliament on the 2nd of March 2021 stated that, "the standard method for assessing local housing need is only the starting point in the process of planning for new homes it is not a housing target." Instead it is a starting point. The Council appear to have used this as a target and then increased the numbers via further uplift of 10% generating a total requirement of 16,157 homes over an 18 year period.

- Warrington has an urban capacity of approximately 11,800 homes that could be built on brownfield sites, the annual "target" pre the 10% uplift of 816 homes (which I considered to be un sound and excessive), Implies that there is sufficient Brownfield land to support a 14 1/2 year building program. On this basis there is no need to release any greenbelt until sometime well beyond the first decade of this plan.

- The priority of the Council should be renewal of the town centre and the development of Brownfield sites not release of the greenbelt. The councils priority should be that of regeneration of the town centre and the Brownfield sites around Warrington.

- In the early years of the plan an enhanced stepped approach to the building figures could be taken which would allow for only the available brownfield sites to be developed. Greenbelt release as an immediate consequence of this plan will have the affect of drawing development and developers to the released greenbelt rather than focusing attention and effort on the town centre and Brownfield developments and Work contrary to plans to regenerate the town centre.

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- The plan is building the wrong homes in the wrong places, Warrington needs affordable housing of mixed tenure but this affordable housing needs to be near to the town centre with the facilities of the town centre accessible to those living in affordable housing. The plan does not deliver this in fact its target for affordable housing is only 20% for inner Warrington developments and 30% elsewhere.

- The 2018 ONS data predicts significantly lower growth for the town, in fact a projected housing requirement of 458 homes per annum verses the plans 816 homes per annum. The Plan has not been adapted to take into account the latest data. Importantly the growth in housing numbers generated by the standard model are "not a target" but a starting point, this starting point should be amended to reflect the 2018 ONS data. Because of this failure to adapt the growth numbers driving the plans are not sound.

- The lack of sustainability of the plan is hi lighted by the development of more warehousing facilities on greenbelt land at the 656 employment area. The plan for 656 fails to understand the potential scale for automation of warehousing facilities, the predicted jobs growth is unlikely to happen as warehouse companies automate their processes. The South East Urban Extension creates a huge suburb with connectivity issues to the town centre. The South East Urban Extension is likley to be of residential interest for to people working in Liverpool, Manchester and Chester, creating commuter dormitory wholly car dependent and disconnected from the Town.

- The southern most developments in the South East Urban Extension will be adjacent to the M56 exposing residents of that area to air and noise pollution. It cannot be a sound or a sustainable policy to be locating people's homes in close proximity to the heavily used M56 at junction 10.

- The opportunity to develop Fiddlers Ferry which has rail transport links to the town centre has been sadly missed, this location should not become an employment location but rather a new village built on Brownfield land with sustainable links to the town centre and beyond. The plan as currently drafted fails to capitalise on the opportunities that present themselves to the council for Brownfield land residential use at Fiddlers Ferry.

- The South East Urban Extension creates a continuous suburb merging Stockton Heath, Grappenhall, Grappenhall Hayes, Appleton, Wrights Green, and Stretton. Appleton Thorn is one field away from becoming part of this huge suburb stretching from the M56 all the way to the Bridgewater Canal. It runs contrary to the councils own stated goal of preserving the distinctive villages that surround Warrington, instead it merges all the distinct areas referred to above into one enormous suburb.

- The plan will create material harm to the visual and residential amenity of those already living in Stretton, In particular it will destroy the current views afforded to those entering Warrington from junction 10 of the M56, a view currently across open fields towards Saint Matthews Church which gives the overall impression of entering a rural village environment. The proposed development of this greenbelt land will have the effect of creating a suburban feel the moment one leaves junction 10 of the M56. The release of this land is both unnecessary and damaging to the beauty of the current environment.

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)**