

# 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:** Alison Freeman

**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 Developer / Landowner

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	Emery Planning
<b>Agent name (if applicable)</b>	Alison Freeman
<b>Address 1</b>	[REDACTED]
<b>Address 2</b>	[REDACTED]
<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.

MD2 South East Warrington Urban Extension

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

Both of the above

**If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).**

Please see attached representations

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

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

Please see attached representations

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.

Please see attached representations

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.

Please see attached representations

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:**

We wish to attend the hearings to make oral submission, respond to the Inspector's questions and respond to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.

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: 19-202 Letter of representation on behalf of M. Osborne - Land at Lumb Brook Road, Wrights Green.pdf - [REDACTED]

You have just completed a Representation Form for MD2 South East Warrington Urban Extension.

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)**

Local Plan  
Planning Policy & Programmes  
Growth Directorate  
Warrington Borough Council  
East Annexe  
Town Hall  
Sankey Street  
Warrington  
WA1 1HU



Macclesfield: [REDACTED]  
Chester: [REDACTED]

[REDACTED]  
[www.emeryplanning.com](http://www.emeryplanning.com)

15 November 2021

EP ref: 19-202

Alison Freeman

T: [REDACTED]



Dear . Sir / Madam

Re: Warrington Updated Proposed Submission Version Local Plan consultation –  
Representations on behalf of Mr M. Osborne in relation to land at Lumb Brook  
Road, Wright's Green.

Emery Planning are instructed by our client, Mr M. Osborne, to prepare and submit representations to the Warrington Updated Proposed Submission Version Local Plan consultation. Our representations relate to our client's interests in the Wright Green area, with specific regard to the emerging policy MD2: South East Warrington Urban Extension (SEWUE).

Our client broadly supports Policy MD2 and agrees that there is a significant need for additional high-quality housing in the Borough. This strategic allocation would go a considerable way to addressing future housing needs.

Within the draft proposal map, there are numerous "islands" shown within the SEWUE area. As these islands would no longer perform any Green Belt function, this would appear to logically suggest that these areas of existing development, currently within the SEWUE boundary, will be removed from the Green Belt and fall within the urban area of Warrington. It is also assumed that these areas will be excluded from the policy requirements to be imposed via Policy MD2. For example, development proposals within any of these islands will not be expected to incur development contribution costs to fund the significant infrastructure requirements needed as part of the SEWUE.

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity, please visit [www.keatonemeryfoundation.com](http://www.keatonemeryfoundation.com)



For ease of reference and for the avoidance of confusion we illustrate a number of these islands in the Wright's Green area in image 1 below.

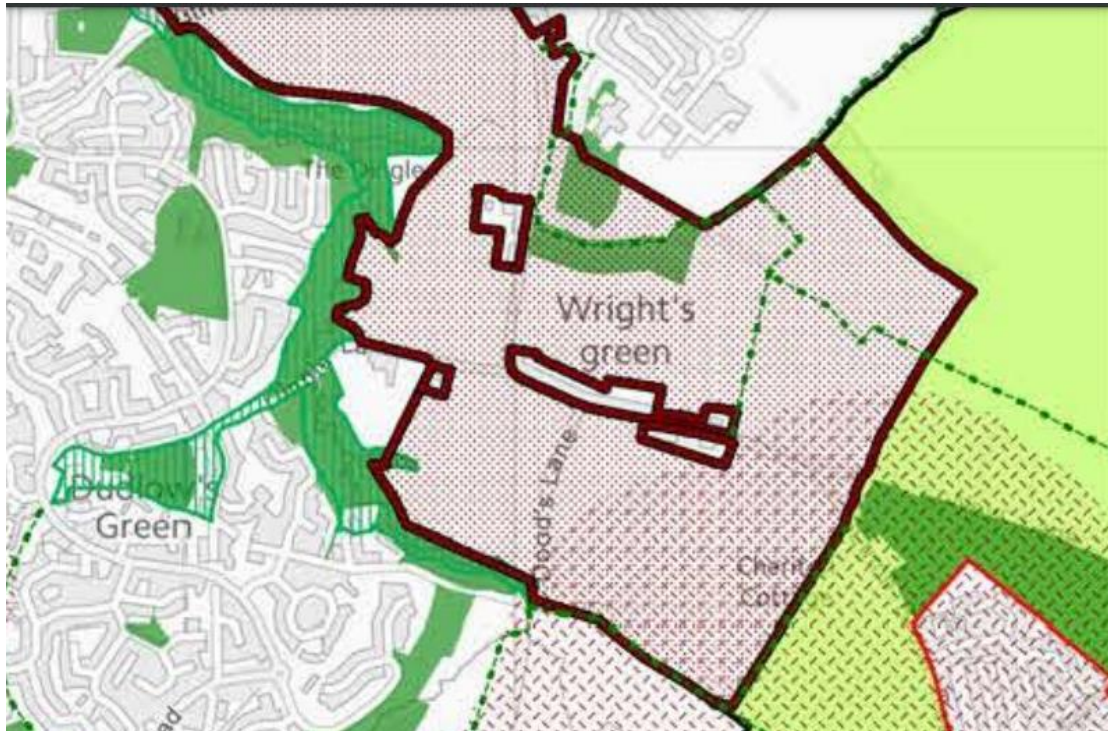


Image 1 – Wright's Green Insert taken from Warrington Updated Proposed Submission Version Local Plan Proposals Map – November 2021

Whilst this logical position is assumed from our reading of the policy and proposals map, greater clarity on these "island" areas would be appreciated to avoid any ambiguity. We suggest that this clarification could be provided either within Policy MD2 or the supporting text.

Confirmation is respectfully requested that these areas will be removed from the Green Belt; that they will not be subject to the stipulations set out within Policy MD2; and that within these areas, there will be a general presumption in favour of sustainable development given they will fall within the urban area of Warrington.

We trust that the above observations regarding Policy MD2 will be considered carefully by Warrington Borough Council as work on the plan progresses and that the additional clarity requested can be incorporated within the plan text.

Should you have any further questions regarding the points made in this letter of representation, please do not hesitate to contact this office at any time.

Yours sincerely

Emery Planning

*Alison Freeman*

**Alison Freeman BA (Hons), MRTPI  
Director**