

From: [REDACTED]
To: [Local Plan](#)
Subject: Warrington Local Plan
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Importance: High

I am writing in response to the Local Plan consultation having read through both the summary and the supporting documentation. There is clearly a very large amount of work that has gone into the development of the plan. There is also a clear desire to ensure that consultation responses are confined to the considerations of the extent to which the Local Plan meets the requirements of the Planning Inspectorate. I therefore focus on this aspect within my response.

Whilst I recognise the need to increase housing provision within the region, the strategy of focusing development on Green Belt and green space in South Warrington rather than extending development to the North of the town is poorly conceived. As far as I can see, it focuses on economy to the detriment of the other two pillars of sustainability (environmental and social). The Local Plan would undoubtedly provide a direct enhancement to the economy of the region, with an increased work force and increased employment opportunities. However, by focusing this development on South Warrington, this direct economic benefit will come at significant environmental and social cost.

The main South Warrington development area is at the boundary between the urbanised area and the large contiguous green space to the south of the town, which extends into North Cheshire. The extensive loss of green space within this area will significantly enhance the geographic isolation of the pockets of green space that exist further in towards the town centre, including important protected sites such as Woolston Eyes. There are weak statements in the sustainability appraisal about the potential for increasing biodiversity as a result of the proposed development, but no evidence is presented for this and it is acknowledged that the suggestion of net gains is 'uncertain'. To meet the test of 'soundness', the Local Plan needs to be appropriately justified (based on proportionate evidence). The analysis presented within documents such as the sustainability appraisal report is not fit-for-purpose based on this test of soundness. As with other development plans, consultants have been contracted to deliver reports to underpin the Local Plan. Unfortunately, although they present lengthy reports, the content is largely conjecture. A Local Plan of this magnitude, which proposes such extensive and irreversible destruction of green space needs to have a much stronger evidence base. Conjecture does not equate to proportionate evidence.

The minimalist approach to environmental considerations is true of other aspects of the Local Plan, such as consideration of natural capital. There also appears to be no meaningful analysis of the associated loss of ecosystem services or any attempt to value these. When considering the cost-benefit analysis of the Local Plan, this is a significant and unacceptable omission that is inconsistent with national and international recommendations. Whilst the plan may meet the soundness test of consistency in that it accords with national policy by delivering the required set of reports and assessments, the weak and often unsubstantiated content of the documentation does not meet with the spirit of this policy.

Turning to social considerations, the extensive urbanisation of the green space to the south of Warrington will irreversibly change the character of this area. The South Warrington villages will

be subsumed within the urban expansion and this will likely lead to a loss of community identity. There are also significant practical issues to be addressed, such as the implications for the transport infrastructure. The M6 viaduct and the M56/M6 junction are already major traffic problem areas, so creating a 116 ha employment area at the M56/M6 junction without a clear strategy for managing the increased traffic flows is inappropriate. Furthermore, many of the new residents to the proposed 'Garden Suburb' will likely end up working in Manchester and the major traffic congestion already experienced by commuters will be further enhanced. The consultation documentation states that the "Transport mitigation measures will be identified to offset the impact of traffic generated by the employment development". This approach of deferring evidence-based decision making on a key issue like transport, whilst attempting to proceed with getting the Local Plan approved is a further demonstration of a lack of proportionate evidence and hence another failure to meet the test of 'soundness'.

These are just some of the areas in which the Local Plan fails to meet the requirements of the Planning Inspectorate. The plan goes substantially beyond what is required by the Government in its level of ambition, with a firm focus on economic growth. Sadly, this disproportionate focus on the economic aspects, coupled with the weak environmental analysis, superficial considerations of social impact, an extremely poor evidence base and the deferment of key considerations (such as transport implications) until a future time, has resulted in a Local Plan that is not fit-for-purpose. Whilst it appears comprehensive (in terms of the volume of documentation presented), the fundamental flaws in the depth and extent of the analysis relative to the magnitude of the decision being taken have resulted in a Local Plan that is not based on firm foundations. Decision making of this nature, especially over a 20 year time horizon is always going to be 'messy' and based on incomplete evidence. It is truly a 'wicked' decision making context. However, uncertainty is no excuse for poor decision making and there is a fundamental expectation that the decision making will be based on the best available evidence. The Local Plan does not achieve this. A detailed independent review is required from specialists outside of the contracted consultancies along with a more honest and open discussion about the evidence (or lack thereof) on which statements are based. Without this level of transparency, proceeding with approval of the Local Plan would be inappropriate and a direct contravention of the requirements set out in paragraph 35 of the National Planning Policy Framework.

I would be grateful if you would confirm receipt of this email

Yours sincerely

Mike

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