

Response 939

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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 ID number for future reference (pdf attachment).

Name of person completing the form: Peter Lovell

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

Other (please specify):
This response was prepared jointly with my wife, Valerie Lovell, and so represents the views of two people

3. Please complete the following:

Contact details	
Organisation name (if applicable)	-
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	[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.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list:
There are too many inter-related matters for comment that bridge between and across various paragraphs and policies that make it impossible to comment on individual sections of the Local Plan Proposal independently. Hence, my selection of "Draft Local Plan (as a whole)". Thus my comments under point 4 of the form below are integrated and, where they relate to specific paragraphs and/or policies, their numbers are given in my comments.

3. Do you consider the Draft Local Plan is: 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 "Yes/No" answers required in relation to the legal questions in point 3 of the form are unfair to ask of citizens who are not qualified in all the legalities.

The reasons for our answers are set out in the attached document entitled "Lovell Response to Form Question 4"

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.

The "Yes/No" answers required in relation to the legal questions in point 3 of the form are unfair to ask of citizen's who not qualified in all the legalities. Based on the brief information provided in the "Consultation Guidance Note", the answer I am obliged to give in relation to legal compliance is "Yes".

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.

Our proposals are set out in the attached document entitled "Lovell Response to Form Question 6"

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 (I understand details from Part A will be used for contact purposes)

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
I believe it is important for the inspector to hear my responses.

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: Lovell Response to Form Question 4.pdf - [REDACTED]
- File: Lovell Response to Form Questions 5.pdf [REDACTED]

Comments/file description

The two documents give our answers to Questions 4 and 6

You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)

**Response to the Proposed Submission Version Local Plan (LP4)
by Peter Lovell & Valerie Lovell**

Comments on Duty to Co-operate and Soundness (Question B4)

Duty to Co-operate

1. Based on the "Consultation Guidance Note, we have answered "No" to Question 3 on this topic because there is insufficient evidence in the LP4 documentation that WBC has fulfilled its obligation to "engage constructively" given that our feedback in the previous consultation does not appear to have received full recognition with appropriate responses.
2. In particular, there is no comment in the LP4 documentation about the high level of objections raised by South Warrington residents in relation to the current state of north/south traffic flow between south of the Bridgewater Canal and the north-side of Warrington Town Centre.

There also is no substantive proposal in LP4 to address the additional massive burden that would be imposed on these already heavily contested road routes by the proposed Garden Suburb development.
3. In addition, the villages of Grappenhall and Appleton Thorn would lose forever their character of being adjacent to a substantial expanse of green belt land, contradicting part of the reasons for assigning these green belt areas as green belt.
4. Insufficient attention appears to have been given to use of non green belt land to accommodate the proposed need for expansion of Warrington housing, facilities and employment.

Soundness

5. Based on the "Consultation Guidance Note, we have answered "No" to Question 3 on this topic because we do not consider LP4 to be "Justified" (i.e., "it is not an appropriate strategy"):
 - 5.1. Policy INF2 is inadequate in relation to Policy MD2. There will be a massive adverse impact on the existing local community (as well as for people in the new homes of MD2) in terms of traffic flow to/from the north side of Warrington Town Centre, in direct contradiction with the expectation stated in Policy INF1 sub-number 1g.
 - 5.2. Insufficient attention has been given to non green belt land in relation to MD2 and its extent, for which "exceptional" reasons must be given, especially for use of such a large contiguous swathe of green belt land, not just for the period of LP4, but beyond the period as well.
6. As made clear in Points 1-3 above, in Policy INF2, WBC have not made any serious attempt at providing proportionate additional traffic flow capacity from/to the Garden Suburb development to/from the north side of Warrington Town Centre.
 - 6.1. The new vision for South Warrington set out in MD2 will generate traffic flow from 5,100 new homes (rising to 7,400 beyond the period of LP4). The retail areas of Warrington Town Centre and the Riverside, Junction 9 and Gemini retail parks are more than sufficient in size and variety to satisfy the needs for Warrington Borough residents across the whole borough (i.e., there is no need for additional capacity). Thus, existing residents make good use of them and the same would be true for new residents associated with MD2. However, access to all these retail sites requires traffic flow from/to South Warrington to/from the north side of the River Mersey or the north side of Warrington Town Centre. It is extremely unlikely that this will be anything other than by car in order to collect goods not easily transported by public transport.
 - 6.2. Traffic flow from/to South Warrington to/from Warrington Town Centre requires passages across the Bridgewater Canal, the Manchester Ship Canal and the River Mersey, which already are congested at many times during the day and often gridlocked at the Manchester Ship Canal crossing pinch points in Stockton Heath, Latchford and the Cantilever Bridge. There frequently are long traffic queues in both directions at each of these locations. The proposals in Policy INF2 do nothing to alleviate these restrictions in traffic flow and Policy MD2 will add massively to the existing problems.
 - 6.3. In addition, north/south traffic flow around the east of Warrington Town Centre is often highly congested with long queues. This congestion will become worse with the additional traffic from MD2 to the Junction 9 and Gemini retail parks. Policy INF2 contains nothing to address these traffic flow issues.

- 6.4. The Bridgefoot Link (Policy INF2 sub-number 2a) and the Western Link (Policy INF2 sub-number 2d) will ease traffic flow around the west of Warrington Town Centre, but they will have no significant impact on easing the traffic flow from the main areas of South Warrington, particularly in relation to traffic associated with the MD2 development to/from the north side of Warrington Town Centre.
- 6.5. The proposed new/replacement for the Cantilever Bridge across the Manchester Ship Canal will have no effect on traffic flow because the connecting roads (Ackers Road and Station Road) are narrow and incapable of taking more traffic. Even now, these roads often have long queues (as stated in Point 6.2 above).
- 6.6. The Inspector would be well advised to instruct an independent survey of traffic flow at each of the current locations for passage across the Bridgewater Canal and the Manchester Ship Canal to inform his/her assessment of the Local Plan.
7. The extent of the proposed MD2 development is linked in LP4 to new, local employment developments in LP4. Assuming, for example, an average of 1.5 persons requiring employment per new home, the proposed 5,100 new homes (rising to 7,400 beyond the period of LP4) will generate demand for 7,650 jobs (11,100 beyond the period of LP4). It is very unlikely that this number of jobs will be delivered by the proposed new employment developments in LP4. Hence, a high proportion of the new jobs required to satisfy the demand from the new homes in MD2 will come from outside the borough and a high proportion of those will require commuting by car, which is in contradiction with many of principles set out in Policy ENV8 and the national drive for reducing environmental impacts.

**Response to the Proposed Submission Version Local Plan (LP4)
by Peter Lovell & Valerie Lovell**

Modifications to the Local Plan (Question B6)

Alternatives to Development of South Warrington Green Belt

1. LP4 makes mention of the Fiddler's Ferry Power Station (e.g., Paragraphs 2.1.44, 2.1.49, 3.3.23, 3.4.4 and 4.2.24), but dismisses any development at that location as being too far into the future (e.g., Paragraphs 3.3.23, 4.2.24 and 5.1.16). We now know that the power station will close in 2020. This is far from being well into the future, given the LP4 period extends to 2037.
 - 1.1. The power station has been a blot on the borough landscape for a long time and its closure coupled with the period covered by LP4 provides a golden opportunity to redevelop the site and eliminate this blot.
 - 1.2. WBC recognises the development opportunity provided by the site of the power station, but references employment development only (Paragraph 4.2.24). We believe this vision is too narrow and should be broadened to include housing. Adjacent green belt land on the north side of the A562 that is not listed for development should be taken into consideration when reviewing how best to develop the area because it has no impact on existing housing in the area. Policy MD1.3 sub-number 38 argues against such development because it would eliminate separation of Warrington borough from Widnes borough. We do not agree that this separation should bar development if it is appropriate and use of a brownfield site with adjacent areas should be a priority. The nearby location of Widnes Town Centre and its retail parks would be easily accessible and take some traffic flow away from Warrington Town Centre, which can only be good overall.
2. There is a strong argument for replacing the volume of MD2 development by greater development around each of the existing Inset Settlements. This would require loss of green belt space adjacent to these settlements than already planned in LP4, but would have the benefits of: (i) distributing the loss of green belt land so that the impact is not so visible; (ii) distributing across the borough the additional traffic flow from new homes to retail parks and Warrington Town Centre; and (iii) eliminating the need and cost (financial, land use and environmental) of building and operating new schools, local centres and retail hubs. Small developments into green belt land around Appleton Thorn and Grappenhall could be included as part of this overall plan (constrained by traffic flow considerations).
3. HS2 receives a few mentions in LP4, but the plan makes no attempt to address the areas in the borough that would receive most direct benefit from HS2, i.e. the east side of the borough, despite the likelihood of HS2 being in place within the period of LP4. More serious consideration of the implications of HS2 for the borough needs to be given and plans made for developments that will take most advantage of the opportunities.

Traffic Flow from/to South Warrington to/from the North Side of Warrington Town Centre

4. If the Inspector accepts the MD2 development with the proviso that it is viable only if the road infrastructure for traffic flow from/to South Warrington to/from Warrington Town Centre is substantially improved and appropriate for the new size of South Warrington housing, then a major road infrastructure development is necessary to make Policy MD2 viable.
 - 4.1. This road should be a dual carriageway that feeds centrally out of proposed Garden Suburb (maybe from the proposed Neighbour Centre for easy access from any of the three proposed Garden Villages) across the Bridgewater Canal and the Manchester Ship Canal and links directly onto the Knutsford Road north of its junction with Wash Lane. The Knutsford Road from Wash Lane to its junction with the Bridgefoot traffic island intersection with the A49 should be made dual carriageway with double yellow lines on both carriageways to eliminate restrictions to traffic flow. A link on/off the new road via a roundabout link to Witherwin Avenue would ensure that people currently living in existing homes in South Warrington would make use of the road, thereby relieving much of the existing congestion at the three current crossing points over the Manchester Ship Canal, as well as pinch points for crossing the Bridgewater Canal. It would also provide for movement of goods by lorry to the retail centres and schools proposed in MD2.
 - 4.2. This proposal would inevitably require some compulsory purchasing of properties, but the impact would be justified by elimination of traffic flow issues. It is, however, justified if the Inspector concludes what is set out in Point 4.