

Response 805

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: Joan Carr

Email address: [REDACTED]

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

A local resident who lives in Warrington

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.

None of the above

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 scale of development proposed is not supported by the evidence provided. The targeted provision of approx 20,000 homes appears to be a centrally imposed target with weak justification. The assessment was provided by planning and real estate consultants, not housing professionals. It does not appear to have been stress tested for the impact to Brexit, for example. There is no evidence of the availability of Homes England funding, or of consultation with Registered Housing Providers, but the Plan correctly identifies that inequality and housing quality is worse than the national average; so very precise targets are set for affordable and social housing, but there is no evidence of their deliverability. This makes the plan unsound

There appears no real sense of where these upto 50,000 new residents will work - the concern would be that many (if not most) would commute to Liverpool / Runcorn / Chester / Manchester, using a road network that is already overloaded. There is no evidence of cross referencing or correlation with adjacent local plans (except one reference to St Helens) or city region plans. This oversight makes the Plan unsound.

Linked to this, there is little evidence of real, detailed planning for sustainable transport to support existing and new settlements. Section 7.1 is a bland recital of worthy objectives, but it is not linked to any concrete proposals or measures, such as bus lanes, public provision of EV charging points, encouragement of travel by public transport, identified sites for bus priority measures, potential park and ride sites, residential area speed limits, resident only parking areas, parking provision at new commercial premises etc - or even a meaningful recognition that these will need to be considered in the early years of the plan's implementation. The transport section does not identify a single road, junction or settlement for investment or improvement. This means the Plan is not sound. What work has been undertaken to consider innovation such as new rail stations or guided busways to support the proposed expansion?

There is inadequate assessment of health, social care and education provision. All the major healthcare facilities are currently north of the Ship Canal and River Mersey; most of the expansion is to the south. Have the NHS and partners been involved in assessing future need and provision? Significant Primary Care facilities will be needed south of the Canal, and there are concerns about reliable access to and from facilities in the north of the borough, given the increased traffic forecast and the already congested situation in and around Stockton Heath centre.

This concern also applies to the Fire and Rescue Service provision and Police facilities - have the relevant authorities been consulted and committed to the necessary investment? The plan is therefore not sound. Specifically, the presentation of the BUPA Spire hospital at Stretton as a healthcare site on the (poorly presented) maps is misleading.

Warrington already struggles for post 18 education provision - the provision available compares very poorly to other towns of similar size and smaller across the UK - for example, Dumfries, pop 30,000, has 2 university campus and a large FE college - Warrington has only a small and remote Uni campus if the proposed expansion is to be sustained, this must be addressed. It is ignored in the Plan, but the proposed expansion would be an ideal opportunity to attract one of the north west's many Unis to establish a new Warrington campus with all the employment and education advantages that would bring.

The Warrington Green Belt was confirmed as recently as 2014. The Plan states that the release is required to support the development needs, thus meeting the exceptional needs requirement - but the development needs are not proven by the Plan, but appear to have been imposed from Whitehall. The Plan is therefore not legally compliant.

The use of terms such as Garden Suburb and new villages is disingenuous - all recent building around Warrington has been of a bland generic style of suburban housing, and there is no suggestion that this would change. Existing village centres such as Stretton would be overwhelmed by the demands imposed by new development around them. Sites are put forward for release from the green belt as they 'are being promoted by developers'. That is not a valid reason to release green belt or to prioritise a site. The Plan is therefore not legally compliant and not sound.

The scattering of the proposed development shown on map figure 6 weakens the green belt right around the borough, but the exceptional circumstances that have arisen since 2014 are not articulated. There is already a gap in the Green Belt on the west side - but the Plan virtually eliminates the Green Belt between Stockton Heath and the M56, which has the knock-on effect of making the remaining Green Belt south of Grappenhall and to the west of the M6 isolated from the remaining Green Belt and thus vulnerable to further development - the Plan therefore weakens the protection of the Green Belt that is not surrendered to development. It would no longer be a belt, but a patchwork. This makes the Plan unsound and not legally compliant.

Proposed commercial development is predominately close to the M6 / M56 interchange - an area which already suffers from almost constant congestion and poor air quality. It would also be dependent on road transport as there is no rail link in that area, which is shortsighted at a time when Govt policy is to encourage modal shift to rail and HS2 is in part designed and projected to increase capacity on the existing WCML for freight traffic. There is no reference to Northern Powerhouse Rail or the prospect of an HS2 station. This is not sound planning.

The protection of woodland areas, inc the Pewterspear woodland and other sites is not adequately demonstrated. This makes the Plan unsound.

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.

The Plan needs to:

present a reduced and better sourced target for growth
demonstrate how affordable and social housing will be provided / facilitated
demonstrate how education (esp post 18), health and transport provision to support that growth will be achieved, including protecting and improving air quality and reducing carbon emissions
reduce dependence on unspecified commercial activity around the M56 / M6, by facilitating other transport modes
resist destroying green belt to suit developers, and ensure the Green Belt remains a viable proposition
demonstrate how homeowners and private landlords will be encouraged to improve the standards of existing housing (in particular, energy efficiency), and to utilise housing stock to best effect to improve standards for current citizens and provide a partial alternative to new development

In summary, the Plan needs to set measurable goals for how expansion can drive improvement in education, health, housing and environmental standards. Currently, it does not address these issues but merely seeks to justify releasing Green Belt for unspecified but motorway based commercial activity and commuter housing

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

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)