

# Response 845

## 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: Jeffrey Pratt

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 plan is not sound because it is based upon population and housing requirement figures that are inconsistent by up to a factor of 2x (100%) – for example, the plan is proposing 24,000 homes for a population growth of 24,700 in a town where the average number of people per household is above 2.0 (2.3 in 2011) – these number simply do not agree and the plan should be cut back to a number that matches the figures – something in region of 50% fewer planned houses. The plan is not based on realistically achievable targets if previous local housing delivery rates are considered. The plan is also unsound due to being based on 20-year population growth projections that are not consistent with previous growth rates (error factor of 2x (100%) and it is not possible to have any reasonably accurate population projection that far into the future. The plan is also based upon vague and unsubstantiated economic growth projections. The plan does not explicitly state that greenbelt land will only be used after brownfield/urban land is exhausted and instead has a distinct vagueness that lends itself to making it easy for the council to work with developers to do the opposite – the plan does not satisfy the 5 requisite criteria for release of land from greenbelt. (to check the unrestricted sprawl of large built-up areas, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns, to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, to prevent neighbouring towns merging into one another) The term “garden neighbourhood” is used to disguise a plan to build 1000s of houses – this is not a neighbourhood, but a village/town in its own right, which will encroach upon Appleton Thorn and Stretton, regardless of the tiny green circle around them. The plan does not explain how the proposed new public facilities and infrastructure will be funded. The plan contains no solid proposals for removing existing traffic problems, let alone dealing with the increased number of journeys if the plan is fully implemented. The road proposals are listed as “not agreed, approved and not fixed in design or location” – in other words, absolutely no evidence there is any idea how to cope. The plan is not based on solid employment or economic statements and the growth targets are set by organisations with a vested interest in the figures being used and are in conflict with other official figures. All of this points to an incomplete, ill-considered and unsound policy that is not deliverable

The plan has not met duty to co-operate by virtue of being built upon numerous statements saying, “this is still to be investigate” and “that has not been decided” and often “we don’t know.” These are the answers I received to every question I asked about plan details when attending information session at the stadium. This is not fulfilling duty to inform and discuss – they went through the motions but didn’t deliver anything of substance when details questioned

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.

I cannot comment on whether it is legally compliant or not, only that it does have an mention in the LDS

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.

In 2011, the average household was 2.3 people, yet the plan is essentially stating a goal to build 1 house per person when compared to projected population growth. Even if assuming an increase in % single occupant households, the target number of houses should be reduced to 12,000 range. This is FULLY covered by brownfield/urban projections as provided by the council.

There are highly inconsistent population growth figures, which vary by a very large margin. The figures indicate , the population growth expectations for 2012-2037 are 31, 900 and 2015-2037 are 24,700. This indicates a population growth of 7,200 for 2012-2015, yet on page 15 the populations stated for 2011 and 2015 show a growth of only 5472. Assuming a reasonably uniform distribution of growth across the differing number of years, population estimates and census would indicate actual growth of only 4100 for 2011-2015. Your overall figures therefore have an overestimation of 75% growth for historical figures. This indicates any projections are likely to also be subject to a high margin of error and should not be used to guide any policy until discrepancies are investigated and the policy should not be for 20 years, but only 10, after which a re-evaluation should take place.

Remove all mentions of undefined roads until such time these can be defined in enough detail to actually provide evidence for the proposal. The lack of any detail negates their use as evidence.

Give details on solutions to the M56 and M6 junction traffic problems before suggesting any new traffic from housing or employment areas.

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:**  
There needs to be a direct challenge to the inconsistency of the figures used.

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 another Representation Form (Part B)

## PART B - Representation Form 2

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Exceptional Circumstances for Green Belt release

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 plan to release greenbelt land is based upon a number of new houses equivalent to 1 house per person in terms of projects population growth. This is simply unsound and if the number of houses is modified to more accurately reflect the local household density, all housing needs could be satisfied with brownfield/urban development. The plan is also based on unrealistic population and economic growth figures

The plan has not met duty to co-operate by virtue of being built upon numerous statements saying, "this is still to be investigate" and "that has not been decided" and often "we don't know." These are the answers I received to every question I asked about plan details when attending information session at the stadium. This is not fulfilling duty to inform and discuss – they went through the motions but didn't deliver anything of substance when details questioned

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.

It shows in the local plans, but otherwise I cannot comment on legal compliance

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 should be adjusted to reflect local household density and reduce number of houses to circa 12000

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 Exceptional Circumstances for Green Belt release. What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)