

Response 892

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: Christopher Ritchieson

Email address: [REDACTED]

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

A local resident who lives in Warrington

A person who works 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	-

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)

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.

I believe the draft plan is not sound because it fails to reflect the true needs of Warrington as a town in term of its development in the short or long term of the plan. It fails in the following regards;

- It incorrectly predicts future housing needs based on out of date figures and it has claimed it must use the previous figures despite confirmation from central government that this is not the case and that it is appropriate to use updated figures and that this should be for guidance only not strictly adhered to. Using the most up to date population growth figures would result in fewer homes being required.
- It fails to address the required infrastructure needs for such a large development in terms of the proposed garden suburb, given the well evidenced challenges the borough and town face with air pollution and high rates of respiratory illness. Similarly it offers no evidence of adequate transport infrastructure with no indication of a rail link and the nature of properties proposed suggesting a large increase in private motor vehicles when the existing infrastructure is inadequate to cope with current demands.
- It fails to provide adequate or reasonable justification for such largescale building on greenbelt land, especially as national guidance indicates this should occur only if exceptionality can be demonstrated. The plan indicates that the majority of new homes will be built on greenbelt land and indeed indicates that it is likely the greenbelt land may be built on first before brown field sites are developed. The plan suggests this is acceptable because only 10% of the overall towns greenbelt is being released but this is misleading as this figure includes the greenbelt allocations for all outlying villages and still fails to establish exceptionality in the reasons for doing so.
- The recent announcement of the closure of Fiddler's Ferry Power Station has not ben included in the plan and would provide extensive land for brownfield development within the early years of the plan. Other examples nationwide have shown that it is entirely commercially feasible to redevelop this and similar sites. This is only one example of where brownfield sites have been ignored or their potential underestimated.
- The plan proposes to release large areas of greenbelt land for industrial/commercial development. This is despite extensive local objection to similar developments at the present time and in the recent past on exactly the same areas proposed. There is no clear justification or reason for exceptionality in the case of this portion of greenbelt being released and it is not in keeping with the towns needs as the number of jobs predicted appears extremely high compared to those delivered in similar local developments such as distribution hubs and warehousing around Manchester Airport and in Runcon & Halton over the last decade.
- The plan fails to consider adequately the environmental impact of building on an extensive area of south Warrington's greenbelt and the way this will fundamentally change the character of the area, the wildlife in the area and the historic nature of areas such as Thelwall and Grappenhall.
- The plan disproportionately affects one area of the town which will result in almost complete destruction of south Warrington's greenbelt, especially as the plan fails to demonstrate adequate consideration of the impact of similar plans being developed by neighbouring boroughs such as Halton which will also develop areas along the M56 corridor resulting in the failure of the greenbelt to prevent urban sprawl and the complete loss of greenbelt land in multiple boroughs along the M56 corridor.
- The plan fails to make adequate accounting for the required provision of health services and school places in the newly developed areas. The local GP practices expect they will be unable to expand to accommodate the additional growth in population which will disproportionately impact on a small number of practices and thus risk overwhelming those practices in South Warrington. A more even distribution of development would reduce the risk of failure of those essential public services in one part of the town. Release of funds from developers to support infrastructure, education, health etc is unlikely to adequately mitigate this pressure due to the difficulties recruiting into particularly General Practice.

I believe the plan is not legally compliant for the following reasons:

- It has failed to address the requirement to justify the release of Greenbelt Land for development.
- The local authority have failed to adequately recognise and manage conflicts of interest, especially in regard to the disproportionate development of land which falls within the districts of non Labour councillors with a majority labour administrations.
- Most importantly the local authority have failed in their duty under the public consultation guidelines. Specifically they have failed to adequately consult with the public during the initial presentation of the plan - by providing inadequate notice, inadequate space at events and an overly complex plan in a form which was not access ble to those with disabilities or indeed to those who are well educated and with a high degree of literacy. They have subsequently failed to reflect the feedback during that first consultation in the current draft local plan which shows no meaningful changes to the proposal. This fails the principles of public consultation in that (a) the consultation has occurred on a predetermined decision where there is not a meaningful opportunity to influence the plan (b)the body undertaking the consultation has failed to listen to and reflect the concerns raised in that consultation in the revised plan (c) the authority has failed to adequately evidence why it has chosen not to take into account the public opinion offered during the consultation.

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.

Because of the failure to adhere to the principles and requirements for a fit and proper public consultation I believe to make the plan sound it requires the evidencing of a proper process of public consultation and that the information gathered during such a consultation has made a meaningful impact upon the proposals - that the LDP is open to genuine and substantial change in line with the consultation findings.

In order to make the local plan fit for purpose I propose the up to date growth figures should be used to identify a lower and more accurate housing need, this brown field sites including Fiddler Ferry should be incorporated into the plan and that a commitment to develop brownfield sites before releasing green belt land should be made, that the amount of green belt land used should be more equitably distributed across the town to minimise the impact on public services and transport. That a proper air quality impact and transport plan including full public transport connectivity should be approved prior to the LDP and finally that no release of greenbelt land for commercial purposes should be made as part of the plan given the lack of a compelling and legally justifiable argument to do so within the current plan.

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)