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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 20 16

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1: Contact Details (Compulsory)

Title: Mr

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Organisation (if applicable): Local Resident

Address:



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2: Questions

Question 1

Do you have any comments to make about the Council's evidence base?

Question 2

Do you consider the assessment of Housing Needs to be appropriate?

Question 3

Do you consider the assessment of Employment Land Needs to be appropriate?

Question 4

Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

Question 5

Do you consider the assessment of Land Supply to be appropriate?

Question 6

Do you consider that Green Belt land will need to be released to deliver the identified growth?

Question 7

Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

Question 8

Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

Question 9

Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?

Question 10

Do you consider the Sustainability Appraisal Scoping Report to be appropriate?

Question 11

Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

Question 12

Do you agree with the assessment of Local Plan Policies at Appendix 1?

Question 13

Do you consider the proposed 20 year Local Plan period to be appropriate?

Question 14

Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

3: Responses

Question 1

Please note that all documents provided as part of the consultation process have been 'skim' read as there is limited time available for an individual to sit down and read in detail - please consider this when reading responses below. It is also noted that many of the documents are technical in detail and could be considered to be outside the sphere of a professional as well as a non-professional person's capacity to understand them. These aforementioned factors could be viewed as a weakness in the consultation process. In addition, although it is recognised that boundaries have to be set regarding consultation, 'fixed' questions set by WBC could be considered inappropriate.

Warrington Borough Council (WBC) evidence base appears to be robust when looking at housing and employment requirements. However, it appears weak when looking at the infrastructure needed to support housing and employment requirements, in particular a failure to acknowledge wider environmental concerns at the preliminary stage.

However, it is noted that further consultation at the detailed stage is a requirement so that stakeholders can input in an appropriate and timely manner - this is welcomed and I look forward to commenting on the updated draft Local Plan in 2017. Nevertheless, rather than just looking at what can be taken for development - potential amenity/biodiversity locations and green routes both within green belt and urbanised areas should be highlighted and safeguarded at this preliminary stage. These could include more formal areas such as Victoria Park and less formal green space such as areas adjacent to protected sites and disused railways.

Question 2

It is appreciated that housing is a key issue for WBC and for its residents. However, as already discussed in response to Q1, the key to making this all work is the retention of existing green space and appropriate provision of new quality green space for biodiversity and amenity. Appropriate supporting infrastructure would also be a prerequisite – this may include utilities, schools, doctors, hospitals, public transport, shops, care homes, nighttime economy...

Question 3

Ditto response to Q1 and Q2.

Question 4

Yes. However, the alignment of other key elements (as previously discussed) that would make the strategic housing and employment elements work should be considered at this preliminary stage rather than considered or worse overlooked later.

Question 5

Unclear which document/s Q5 relates to. Is it the Urban Capacity Statement or the Green Belt Assessment or both/neither - please clarify.

Question 6

It is irrelevant whether I think it appropriate or not to release Green Belt for development. Obviously WBC considers that Green Belt will need to be released to provide the identified growth, and I can sympathise with that view. The Government view however is that Green Belt should be protected from inappropriate development and urban sprawl.

Moreover, once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Clearly WBC have given due regard to the long term permanence of Green Belt boundaries, but how they arrived at the assessment requires further scrutiny, which I do not currently have the time to undertake.

Planning Practice Guidance advises that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. I'm not sure I agree with the idea of 'channelling' development towards urban areas – further exacerbating urbanization for those (humans and wildlife) that live on the fringes and currently, from a human perspective, enjoy a level of openness, a key objective and characteristic of the Green Belt.

As for wildlife, a more strategic approach taking in other factors, as discussed previously and not considered at this stage is required. As an example, it is noted that areas of Green Belt parcels WR25 and WR29 as shown on Arup plan WGB-ARP-SW-DR-PL-0002 appear to form part of the Woolston Eyes Site of Special Scientific Interest (SSSI) (MAGIC 2016), providing much needed protection for wildlife both within and without the SSSI. Adjacent Green Belt parcels WR26, WR27 and WR28 provide a buffer to the SSSI, therefore channeling development towards urban areas using criteria above by releasing these Green Belt areas for housing and employment would undoubtedly introduce negative elements within and around the boundary of the SSSI which in all likelihood would threaten its current favourable status. Better, for wildlife and ergo for WBC residents would be the retention of these Green Belt areas as a 'breathing space' for the coming increased urbanization elsewhere in the borough.

As mentioned at the start, I've not had time to review all the documents and use Green Belt parcels WR25 to WR29 as an example – it may be that there are others that require increased scrutiny.

Question 7

Can only see two identified strategic matters – housing and employment – what’s the third? Is it to ensure that the housing and employment growth is achieved in a sustainable manner? Other than the AECOM SA guidelines, there is no detail of what the ‘sustainable manner’ is - please advise and how it would be measured long term. The Community Infrastructure Levy – what’s this? funds to build new, managed, quality green infrastructure to replace the mature habitats/biodiversity that will be lost to development or to protect/manage existing? Or funds to be siphoned off elsewhere?

Question 8

No I do not wholly agree that Green Belt land should be removed and safeguarded for future development beyond the life of the Local Plan without compensation elsewhere – should that not say ‘sustainable’ development?

Anyway, don’t the Homes and Communities Agency already have a lot of ‘safeguarded’ development land in Green Belt to south of Warrington?

Further incursion of Green Belt could be more palatable if mature urban green space, in equal measure, such as Peel Hall and Latchford Redundant Railway where also safeguarded for non-development – fair?

A safeguarding measure such as designating appropriate locations as a Local Wildlife Site could be considered? And perhaps adequate sums from the Community Infrastructure Levy directed to manage them?

Question 9

Don't think WBC should be using the word 'Gypsy'.

Otherwise yes – consider it appropriate to consider Minerals & Waste and Traveller needs in scope of the Local Plan review. Think it more appropriate to consider biodiversity and amenity space as well as other infrastructure requirements such as schools, doctors, care homes, swimming pools and so on.

Question 10

Large document – skim read – 3.9.15 Plamyra?

Overall the report appears to cover key topics in a succinct and professional manner. It sets out the guidelines – let's see how it is interpreted by WBC – that's what really matters. As the SA summary advises '*...there are significant nature conservation and wider green infrastructure assets in the borough that need to be protected, enhanced and made more resilient*'...over to you WBC.

This document will be a useful reference point when scrutinizing the revised Draft Local Plan in 2017.

Question 11

Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate? Appendix 2 of what?...found it, The Local Plan Review.

Need to see the reviewed areas fleshed out with proper assessments to enable comments.

Question 12

Without cross referencing to existing Local Plan it appears vague – would have been better to as minimum added headers to policy numbering so the reader had some idea e.g. Policy QE5 Biodiversity and Geodiversity, Policy QE6 Environment & Amenity Protection.

These two policies in particular need to be adhered too in a much more stringent and robust manner as part of the implementation of the revised Local Plan and any development ensuing from it. Impacts need to be demonstrably measured long term and the results of that measurement communicated and discussed with interested parties. This will enable to see what works and what does not. For example, any bat mitigation for loss of a roost should be monitored over a minimum 10 year period and professionally reported.

Question 13

20 years seems a reasonable period for a Local Plan – though it could have step reviews at 5, 10 and 15 years – this would build in safety net and opportunity to review should things change radically.

Question 14

Environment and its long term monitoring would = real sustainability rather than it being whitewashed out at the ES and planning stage.