

# Response 217

## Respondent Details

Information	
[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: Carol Furneaux

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.

Vision

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant		
Sound		X
Compliant with the Duty to Co-operate		

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 do not believe the plan has been positively prepared as there is no provision for an additional crematorium or burial facilities. With so many new homes there will be a huge increase in the number of deaths in the borough.

The crematorium in South Warrington is already at full capacity, with a waiting time of around 3 weeks, sometimes longer. A cortege from North Warrington has to travel through the town centre with all the inherent problems of increased traffic congestion and air pollution, not to mention potential delays caused by unpredictable traffic conditions and the possibility of swing bridge closures over the ship canal.

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.

A new crematorium in North Warrington will be necessary to meet the needs of an increased population.

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 Vision. 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.

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		
Sound		X
Compliant with the Duty to Co-operate		

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.

20 year plan is projecting too far into the future when government requires 15 year plan. Since 2017 there has been new National Policy guidelines and no doubt these will change again several times between now and 2037. Brexit is also causing economic slowdown that will prove this plan to be over ambitious. It is possible that this plan will be totally inappropriate by 2037 and so it is not justified to project further into the future than required.

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 another Representation Form (Part B)

## PART B - Representation Form 3

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

Policy DEV4 Economic Growth and Development

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		
Sound		X
Compliant with the Duty to Co-operate		

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.

Projected economic growth relies too heavily on logistics facilities that have not yet been built. Heavy reliance on warehousing and distribution for employment is an unsound strategy. These types of job are usually low paid, insecure and are most at risk of being replaced by robots. Instead,

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.

Warrington should be trying to attract knowledge based jobs (eg financial, legal and marketing services) that will attract skilled workers be more adaptable to changing trends and technology.

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 Policy DEV4 Economic Growth and Development. What would you like to do now? Please select one option.

Complete another Representation Form (Part B)

## PART B - Representation Form 4

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

Policy DEV1 Housing Delivery

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		
Sound		X
Compliant with the Duty to Co-operate		

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.

UK Committee on Climate Change's latest 'Net Zero' report has been published recently. It states that the only way to stabilize the climate is to reduce the UK's net greenhouse emissions to zero by 2050. To achieve this goal, it says that all homes built after 2025 need to be carbon neutral and no new homes should be connected to the gas grid after 2025. It seems that Warrington's Local Plan aims to build as many houses as possible before 2025 thus avoiding compliance with the recommendations of the Committee on Climate Change and exacerbating the problems of an increasingly unstable climate.

'New Civil Engineer' dated 20 May 2019:

Speaking to New Civil Engineer, Committee on Climate Change chair Lord Deben said that the UK should focus on ensuring all new homes are as efficient as possible with current housing failing to meet standards.

"We should enact tighter building regulations [for new homes] immediately," he said. "New homes must meet standards that will deliver energy efficiency.

"Another important thing is that existing houses are retrofitted because they simply aren't up to standard."

At a time when thousands of schoolchildren are walking out of lessons, protestors are shutting down capital cities and tens of thousands of UK citizens are emailing their MPs demanding action on climate change, it is reckless to instigate a programme of house building on this scale before new building regulations are introduced to ensure that all new homes meet the standards necessary to mitigate climate change.

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 Policy DEV1 Housing Delivery What would you like to do now? Please select one option.

Complete another Representation Form (Part B)

## PART B - Representation Form 5

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

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant		
Sound		X
Compliant with the Duty to Co-operate		

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.

English MPs have approved a motion to declare an environment and climate emergency. Welsh and Scottish governments have already declared a climate emergency, along with dozens of towns and cities, including Manchester and London. In the light of the above, Warrington's Draft Local Plan does not appear to be deliverable in its present form.

The CCC also believes that 20% of farmland (15% of today's open land) needs to be converted to tree planting and bio crops. To build on Green Belt is flies in the face of what needs to be done to stabilize the climate.

Forward thinking cities, like Barcelona, are creating green spaces, not destroying them as Warrington plans to do!

WBC proposes to release Green Belt land for housing even though they admit that sufficient brownfield land will become available. These green spaces will be lost forever, along with the air quality, wildlife and bio diversity that they sustain. Furthermore, the environmental and ecological impact of this loss of Green Belt has not been properly assessed.

Release of Green Belt under these circumstances is not justifiable and is not consistent with national policy that states that Green Belt should only be released in exceptional circumstances when it is absolutely necessary.

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 another Representation Form (Part B)

## PART B - Representation Form 6

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

Policy DEV2 Meeting Warrington's Housing Needs

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant		
Sound		X
Compliant with the Duty to Co-operate		

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.

How will you prevent affordable houses from being purchased by landlords with a portfolio of properties that they then rent out to people who cannot afford to buy their own homes? Affordable housing should be available for purchase only be people who intend to live in it themselves, enabling them to get a foot on the housing ladder in an area where they want to live.

How will you ensure that bungalows and other smaller properties suitable for the elderly and/or disabled remain a manageable size? There is a tendency for people to buy bungalows and smaller properties and then extend them as it is cheaper than moving or buying a larger property. This will be particularly problematic now that planning permission is no longer required for extensions to private property.

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.

Measures should be put in place to ensure that homes can only be purchased by those who intend to live in them.

Measures should be put in place to ensure that bungalows remain bungalows and smaller properties are not extended beyond an affordable size.

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 Policy DEV2 Meeting Warrington's Housing Needs. What would you like to do now? Please select one option.

Complete another Representation Form (Part B)

## PART B - Representation Form 7

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

Policy M1 Monitoring and Review Policy

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		
Sound		X
Compliant with the Duty to Co-operate		

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.

Much of the plan is described as a 'concept', the details of which are to be worked out during the first 5 years of its implementation. How can we be sure that what is decided further down the line will be sound and deliverable?

You have just completed a Representation Form for Policy M1 Monitoring and Review Policy. What would you like to do now? Please select one option.

Complete another Representation Form (Part B)

## PART B - Representation Form 8

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		
Sound		X
Compliant with the Duty to Co-operate		

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 proposals understate the high ecological value of the environment in South Warrington. The plan does not describe how these areas will be maintained and protected from disturbance during and after construction work.

The plan reduces Warrington's Green Belt by 11% and almost all of the land targeted is in South Warrington. WBC proposes to release Green Belt land for housing even though they admit that sufficient brownfield land will become available. These green spaces will be lost forever, along with the air quality, wildlife and biodiversity and geodiversity that they sustain.

Release of Green Belt under these circumstances is not justifiable and is not consistent with national policy that states that Green Belt should only be released in exceptional circumstances when it is absolutely necessary. The rate of building should be slowed down to a sustainable level that keeps pace with the availability of brownfield sites.

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 rate of building should be slowed down to a sustainable level that keeps pace with the availability of brownfield sites.

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 another Representation Form (Part B)

## PART B - Representation Form 9

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

Policy MD2 Garden Suburb

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		
Sound		X
Compliant with the Duty to Co-operate		

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 proposed Garden Suburb will result in a huge loss of Green Belt, some of which was only confirmed 5 years ago in a plan that was supposed to last 20 years. How can we be certain that the proposed new Green Belt boundaries will be adhered to?

One important purpose of Green Belt is to separate settlements and so maintain individual historic and cultural characteristics of each. The proposals for a South West Extension and Garden Suburb will result in a massive urban sprawl and the character of south Warrington and the integrity of its villages will be totally and permanently destroyed. Such a destruction of Green Belt has not been properly justified.

The proposals for a Garden Suburb include the building of 7200 houses without any clear plan to ease problems of traffic congestion and air quality in Stockton Heath. Routes into town from the Garden Suburb would still rely on the three Victorian swing bridges. When Port Warrington comes onstream and there is increased container ship traffic on the Manchester Ship Canal, delays and air pollution will become even worse than it is already. This plan is unsound and not fit for purpose.

The plan proposes that for the next 20 years or more, Warrington, and particularly South Warrington, will become a massive noisy, dusty construction site. The character of South Warrington and the quality of life there will be destroyed, not just for the lengthy construction period, but forever. There is no guarantee that plans on this scale are deliverable to the quality required.

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 Policy MD2 Garden Suburb. What would you like to do now? Please select one option.

Complete another Representation Form (Part B)

## PART B - Representation Form 10

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

Policy MD3 South West Urban Extension

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		
Sound		X
Compliant with the Duty to Co-operate		

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 for a South West Extension proposes to remove part of Moore Nature Reserve. This is an area of mature woodland, meadows, lakes and ponds and is home to a rich biodiversity of plants, animals and birds. Its destruction would be particularly disastrous for wildlife and the local ecology and it is not justified.

There is no guarantee that plans on this scale are deliverable to the quality required.

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 Policy MD3 South West Urban Extension What would you like to do now? Please select one option.

Complete another Representation Form (Part B)

## PART B - Representation Form 11

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		
Sound		X
Compliant with the Duty to Co-operate		

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.

This is an over ambitious plan that is unrealistic in relation to what Warrington has achieved in the past. There is no detail of how the plan will result in regeneration of the town centre or preserve the identity and distinctive character of the area, both of which are WBC objectives.

I believe that the most likely outcome is that many houses will be built on Green Belt but the supporting infrastructure will not be delivered.

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)