

# Response 224

## 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: Edward Brennan

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)	[REDACTED]
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.

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.

A paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list:  
Para 3.4.5 Para 3.4.7; Para 3.4.8;

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.

Para 3.4.5 This paragraph is incoherent; how can minimum density requirements for the town center lead to minimum requirements for green belt release?

Para 3.4.7; affordability of housing is weakly, if at all, linked to green belt land release. It is obvious that the vast majority of houses built on green belt land will not be "affordable", or low cost, because of the highly desirable locations, better suited to commuting to neighbouring cities. This is particularly true of the garden suburb.

Para 3.4.8; the plan does not have any commitment to infrastructure so how can the benefit of infrastructure be a justification for green belt release?

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.

I believe WBC need to review objectively the rationale for green belt land release as I think they have based the current plan on unstated reasoning, such as the desire to increase rates income, rather than the needs of Warrington town and its people.

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 2

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.

Both of the above

If a paragraph or policy sub-number then please use the box below to list:  
Policy DEV 1 Para 4.1.6

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	

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.

The council's assessment of housing need is based on its 2019 assessment. Firstly this cannot be relied upon to be sound in these uncertain times. The outcome of the BREXIT issue, and the length of time it takes to reach a conclusion, will have significant effects on the economic climate of our country and on the numbers of people coming to Britain to live. These effects cannot be known with any certainty at present. Any estimate of housing requirement made at this time is subject to a wide range of uncertainty. We cannot make irrevocable decisions, such as destruction of green belt land, based on this uncertainty. This applies equally to the Council's estimate for the requirement for employment land.

In para 4.1.6, I note that the housing requirement estimate is based on the "Council's economic growth aspirations". How is this representative of what the people of Warrington want? I would say, from my experience, that the people of Warrington do not want their green belt damaged in pursuit of growth. The council really needs to review its priorities and take more account of what people in this town want.

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.

Test the views of the people of Warrington concerning economic growth, in particular how willing they are to sacrifice any of their green belt, and take this into account in planning for the future.

Suspend this plan until the outcome of Brexit is better understood; if this cannot be done then present a range of growth options based on a possible range of economic effects. At the very least the council should state what assumptions it has made concerning the effect of Brexit on economic development and population growth.

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 3

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

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list:

DEV 2 4.1.34

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.

Your policy is to require 30% affordable housing in new green field developments; para 4.1.34 says the majority should be rented. This is commendable in principle but I don't believe you have thought through the practicality of it.

New housing built in in greenfield areas will attract premium prices because the location is attractive and, being on the edge of town they will be very suitable for those who commute to other places in the North West for work. I believe developers will find ways to avoid putting affordable housing in these locations.

They will be unattractive to people on low incomes or elderly or with special needs because they are remote from the town center and services they rely on. You make much in the plan elsewhere about development of infrastructure but unless you can create the equivalent of the town center itself in the suburbs, which is clearly not desirable, the people for whom the low cost housing is intended will be deprived of support.

I note in the transport plans that you are not proposing to improve roads between the south of Warrington and the town center; the congestion on these roads is considerable now and the development of housing and employment land you propose will make the isolation of the proposed housing on greenfield sites worse.

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.

Review the policy target for putting affordable housing in green field locations. Make policy on location of affordable housing take account of proximity to support services such as schools, hospitals, medical centers, council services.. Make a suitable reduction in the target for housing in greenfield 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.

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 the rest of the survey (Part C)