

# Response 508

## 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: James Sullivan

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)	Not applicable
Agent name (if applicable)	Not 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.

Both of the above

If a paragraph or policy sub-number then please use the box below to list:  
Objective W1 4.1.9 3.4.7 3.4.8 1.2.5 10.4 10.4.2 10.4.6

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

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.

W1, 4.1.9:

A Local Plan should be forward-facing. This Plan focuses on the time period 2017 to 2037. By the time the Plan is adopted this will include a significant housing deficit for 2017, 2018 and 2019. It is clearly unsound to draft a plan which begins with such a deficit.

The housing need calculation takes account of additional jobs to be created by the planned logistics parks, which has been taken to increase the housing target. This is flawed for three reasons:

1. There is no evidence that the majority of these jobs will be held by Warrington residents. An estimate of the proportion of jobs held by Warrington residents should have been factored in to the calculation, but was not
2. If the jobs provided are below the local average, the impact on housing affordability will worsen, not improve
3. There is no imperative to create these jobs. The reasoning is circular: if we build on green belt land, we can create extra jobs. Those extra jobs will require additional homes. The Council could, simply, choose not to build 656 in the first place

These mitigations would reduce the housing need figure significantly. They have not been addressed in the Draft Local Plan.

3.4.7, 3.4.8:

The Plan includes a significant quantity of Green Belt land without demonstrating exceptional circumstances

1.2.5: The Plan references the large number of public representations but does not summarise these, nor does it explain how they are addressed through a local plan which is virtually identical to the Preferred Development Option which it succeeds. There is no evidence that the previous public consultation was acted upon.

10.4:

The land at Peel Hall has been the subject of numerous planning applications which are substantially identical to the Draft Local Plan. In each case they have been rejected. In 2018 the developer lodged an appeal with the Planning Inspectorate and failed to demonstrate the deliverability of the site. The developer was also shown to have misled the Council and the public in their claims for the sustainability of the site, when it was demonstrated at the appeal hearing that the agreement with the local bus company which had been claimed by the developer did not exist. This goes to the heart of 10.4.2 - the claim that the new community will be 'sustainable'. This was demonstrated, unequivocally, not to be the case as recently as December 2018 in the report by the Secretary of State.

10.4.6:

The suggested buffer zone of 50 metres is insufficient to protect health. The land at Peel Hall abuts two Air Quality Management Areas.

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 answered 'yes' to legal compliance as I am not qualified to assess this. There was not an option to record 'unqualified to answer'. Perhaps this should be considered as an option for future consultation formats.

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.

1. Reduce the time period to 15 years. Given that the current draft local plan involves the destruction of 11% of the borough's Green Belt land, coupled with the uncertainties regarding population dynamics following Brexit, it would appear reckless to have a local plan longer than the statutory minimum.
2. The local plan should commence April 2020, as this is the earliest date on which it could be activated. A local plan should be forward-facing, not retrospective.
3. The housing needs analysis should be revised to take account of 1 and 2 above
4. The housing needs analysis should be revised to reflect the proportion of created jobs which would be estimated to be held by Warrington residents
5. The housing needs analysis should be revised to take account of the actual salaries which would be paid in the proposed created jobs - specifically that cohort of jobs which are expected to be held by Warrington residents - and this information fed back into the affordability calculation
6. The proposed mitigations for Peel Hall are unsound. In particular, the 50 metre buffer zone is not accompanied by any scientific evidence relating to air quality. Given that families are intended to live so close to the M62, and that a care home is also proposed on the fringe of the M62, this is clearly unsound
7. There is no traffic analysis for the Peel Hall development. Given the nature of the site - landlocked - and the Inspector's comments at the 2018 Planning Appeal hearing, this lack of detail makes the Plan clearly unsound. The mitigations to enable traffic flow not to be adversely affected need to be clearly set out as a requirement for the developer

I would also note that several viable alternatives have not been considered. The two most obvious would be:

- Fiddlers Ferry, which is named in the draft local plan but not included in the plan
- the Cockhedge Centre and Newtown House. Newtown House is scheduled for demolition. This entire block is located next to Central Station and the Bus Hub, facilitating green transport options. A high density development here, with retail relocated to town centre, would increase footfall into town, support sustainable transport and protect the green belt

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:**  
If residents are not permitted to present evidence at the examination then the only parties contributing will have a vested interest - developers who seek to profit, and Warrington Borough Council, whose Plan is under examination. I would respectfully request that some residents are permitted to make representations.

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)