

# Response 681

## 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: Judith Thomas

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.

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.

#### Release of Greenbelt Number of Houses

The currently NPPF states under Section 5 (Delivering a sufficient supply of homes) Point 60 as follows:-

'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'

The Local Plan target of 18.9k houses equates to a build rate of c945 houses pa. Warrington historically has only ever grown at a maximum of c550 homes pa in its best year, therefore the number of houses proposed represents a huge departure from historic maximum numbers. Further, the Council has failed to take adequate account of latest population figures and building rates in arriving at its target number of houses or to evidence a sound economic plan which justifies the need for the significant amounts of Greenbelt land to be given over to commercial use. The Council has failed to demonstrate that sufficient 'exceptional circumstances' exist to justify the release of Greenbelt land on the scale proposed. In fact, there may be 'exceptional circumstances' which justify the Council considering an alternative approach to that of using strategic policies when calculating the number of homes required - including Warrington's unique situation in terms of road, rail and waterways intersections and the cost of significantly upgrading these networks to achieve sustainable development.

The plan is for an ambitious 20 years - 15 years would make more sense and limit the need for Green Belt release. This shorter plan period would allow the chance for future significant local changes to be incorporated - the key one of these being the future of the Fiddlers Ferry power site which has been completely ignored in the plan, yet is a significant potential source of brownfield land for commercial or (admittedly less likely) residential use.

Further, in terms of release of Greenbelt land, there is substantial dispute as to the accuracy of the Council's assessment of the performance of Warrington's Greenbelt land - in particular with reference to the South Warrington areas and the proposed 'Garden City Suburb'

The Council has placed an over-reliance on the October 2016 Arup report in assessing this area of land - the report's accuracy and conclusions have been called into question by industry professionals employed by local residents who have raised significant concerns regarding the report in the following areas (1) status and accountability (2) the insensitive methodology used, (3) inconsistent results reported (4) an incomplete assessment process.

The Council's plan contravenes the recently agreed Neighbourhood Development Plan for Appleton Thorn and would utterly destroy the character and environment of South Warrington Villages such as Grappenhall and Appleton Thorn which would be subsumed by development. The Arup report and the Council have also failed to recognise the protection offered by greenbelt land to the 'greenbelt over-washed' settlements of Grappenhall Village (a Conservation Area) and Stretton.

#### Infrastructure Transport

The latest National Planning framework (NPPF) published in February 2019 sets out the criteria within which the Local Plan must be prepared. Under Section 3 of the NPPF entitled Plan Making Point 16 states that Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable

Sustainable development is annotated in the report as 'a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).'

The objective of sustainable development is summarised in the current NPPF as development which meets the needs of the present without compromising the ability of future generations to meet their own needs.

Again from current NPPF (Examining Plans, Point 35):-

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound.

One of the points which confirms Plans are 'sound' (point c) states that Plans must be 'Effective' as follows:-

- c) Effective—deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;

Further, to quote from the previous version of the NPPF:-

'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.'

Both the previous and current versions of the NPPF make it clear that it is for the Council to demonstrate the deliverability of the Local Plan.

Whilst the Council has (belatedly) now started to do some work on Multi Modal Transport Assessments etc and many of its plans are, on the face of it, attractive, it is crystal clear that hugely significant amounts of infrastructure (the like of which have not been seen in the town for decades, if ever) are required to make the Local Plan deliverable (in particular in South Warrington).

The Council itself has repeatedly stated on its slides at Local Plan consultation events and in accompanying documentation that large portions of the Local Plan are only deliverable if the accompanying transport infrastructure improvements are in place (this is particularly relevant in South Warrington). However, the hugely significant transport infrastructure requirements have not been properly tested or costed and cannot in any way at this stage be viewed as deliverable. Huge swathes of the plans in the Local Transport Plan (LTP4) are untested, uncosted and only proposed towards the end of the plan - yet the Council itself acknowledged in all its presentations that the Plan is not deliverable without these improvements. Even as a lay person, it is apparent to me that the cost of the required transport infrastructure improvements required would run into the hundreds of millions of pounds. Only one of the proposed road infrastructure projects is costed (and these costings have been repeatedly challenged by industry professionals) and only one has any evidence of government funding being forthcoming.

Further, the Council has acknowledged in LTP4 that traditional funding sources (predominantly from Government and Developers) cannot come close to achieving the funds required to make the Local Transport Plan work (in particular in South Warrington). The only suggested alternative funding source brought forward by the Council is a Workplace Parking Levy for central Warrington (they have discounted congestion charging as too unpopular).

Again, even as a lay person, it is abundantly clear that a Workplace Parking Levy cannot possibly ever deliver the likely shortfall which would occur once conventional funding sources such as Government and developer funding have been exhausted.

Add into the mix that the Council has limited control over the current river crossings serving the South of the town (owned by Peel) all of which are in a state of disrepair and the scale of the challenge is immense.

Funding and deliverability of the proposed significant transport infrastructure improvements required must be proven before this plan can be considered in any way sustainable.

#### Other infrastructure

Whilst proposals are in place for delivery of other associated infrastructure such as schools, shops and GP surgeries and some developer contributions to these have been identified again the deliverability for these improvements is called into question. The promised 2 GP surgeries for the Garden City suburb, for example. The GP surgery promised for Chapelford Urban Village has still not been delivered despite planning permission for the same having been in place for over 20 years. Even if these surgeries eventually get built, can they be staffed? Warrington has a very high rate of long term GP vacancies.

All of the above issues contribute to the community's concerns about the deliverability of this plan and whether it can be considered as 'sustainable development'. There has been a significant upsurge of grass roots community action groups in Warrington coming together to challenge the Council's plan on the above grounds. As a community, we're not anti development per se - but sustainable development can only be delivered with the accompanying infrastructure (of all types) and the Council has failed to convince the community of the deliverability of its plans.

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.

Further assessment of suitability of land and a further and more comprehensive assessment of the categorisation of Greenbelt land.

A consideration should be made as to whether Warrington's location challenges and under-invested transport infrastructure, plus historic growth rates achieved constitute the 'exceptional circumstances' necessary to justify deviation from strategic policy under NPPF

Further consultation should be given regarding the suitability of Fiddlers Ferry site for inclusion within the plan

Most critically, significant further work on the multi modal transport model is required to undertake detailed costings and demonstrate availability of funding to achieve deliverability of this utterly essential element of the plan. Without it, the plan can in no way be considered sustainable

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)