

# Response 708

## 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: Catherine Fitch

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A person who works in Warrington

Other (please specify):  
A person who lives in a village which adjoins 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.

Policy GB1 Warrington's Green Belt

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:  
5.1.12 and 5.1.13 in relation to green belt assessment and policies map in relation to the green belt gap between Warrington (Walton) and Moore (Halton)

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		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.

I believe policy GB1 is unsound because it cannot be justified as an appropriate strategy and it is not consistent with the national planning policy framework (NPPF) and in particular in that Warrington's proposals are at odds with the fundamental purposes of the greenbelt. NPPF states that any changes to green belt boundaries must have 'regard to their intended permanence in the long term' Whilst I accept that the term permanence does not ever mean no change, it is essential that any change does not undermine the purposes of the green belt and consequently the permanence of the designation as a whole. With regard to the gap between Warrington (Walton) and Halton (Moore) the proposed Port Warrington and SW Urban Extension will narrow the gap between the two authorities to a pitiful, and frankly already compromised level... currently full of machinery, plant and temporary roadways to access two adjacent railway lines.

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.

Whilst Halton Borough Council's submission Local Plan is awaiting its consultation stage it does reveal a proposed employment allocation (extension of Manor Park to the South of the Manchester Ship Canal) which would result in Warrington's Port Warrington allocation almost touching - effectively eliminating any meaningful gap between the two towns. This is contrary to the purpose of green belt in preventing neighbouring towns from merging. This clearly demonstrates that the two boroughs have not not co-operated with each other in regard to NPPF para 135 at this location.

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 suggest that a green belt gap is retained which is both effective and sustainable by reducing the extent of the Warrington waterfront Employment Allocation and reducing the extent of the South West Urban Extension

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

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each). If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'. If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: moorelane.jpg - [Download](#)

**Comments/file description**

Photograph attached shows 'compromised' green belt gap which will be left if current Warrington Local Plan proposals are implemented

You have just completed a Representation Form for Policy GB1 Warrington's Green Belt. 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 MD1 Waterfront (including Port Warrington)

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

A policy sub-number (s)

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

Policy sub numbers: 2. Removal of employment sites from the green belt 4-11 Delivery and phasing 17-36 Detailed site specific requirements 55 Amenity of residents in Promenade Park ( paragraphs 10.1.22 and 10.1.26)

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		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.

Policy MD1 is unsound because it is:

- i) Not justified as an appropriate strategy
  - ii) Not consistent with national policy protections for designated wildlife sites
  - iii) Not consistent with national policy in relation to the green belt
  - iv) Not effective in relation to transport links
  - v) Not effective in terms of cross boundary impacts and the protection of residents opposite the Port Warrington site
  - vi) Not consistent with national policy on protection from noise pollution
- It is doubtful whether the plan is compliant with the duty to cooperate

Employment allocations on wildlife and leisure sites are contrary to national policy and contradictory with other policies in the plan to protect green infrastructure, ecology and recreation (Policies DC3, CD4 and DC5 )  
It also impacts on the residential amenity at Moore and Promenade Park, making the plan ineffective in delivering the economic, social and environmental objectives required by national policy.

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 suggest that a the green belt gap gap is retained between Warrington and Halton by reducing the extent of the Warrington Waterfront Employment Allocation

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 MD1 Waterfront (including Port Warrington). What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)

