

Response 710

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: George Lovell

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.

Policy MD2 Garden Suburb

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:
10.2

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.

For the Draft Local Plan to be Sound, it must inter alia be:

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence, and
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.

The Garden Suburb is not justified because:

1. the proposed housing numbers exceed the number required by Government and predicted population growth,
2. the release of greenbelt is excessive - the Plan says that more than 10% of the borough's green belt will be released for development which requires exceptional considerations - potentially including a Judicial Review - rather than being included in a standard Local Plan process,
3. It has not taken into account reasonable alternatives, such as identifying development sites in other parts of the borough or phasing the development over a longer period. The plan goes too far, too quickly to be credibly deliverable,
4. the plan does not adequately deal with the increase in traffic and traffic related pollution that will be seen as a result of the development - Warrington's roads (particularly the river crossings) are already operating beyond capacity,
5. The plan says that Appleton Thorn will retain its identity as a separate village - this is grossly inaccurate and misleading.

The Plan is not effective because, while the housing development will clearly take place, the Council does not have an effective plan in place to deliver the other infrastructure that will be needed to support the development e.g. roads, schools, doctor/hospital facilities, leisure facilities and green spaces. These key factors have simply been deferred because the Council cannot deliver on them.

There is evidence for this in many parts of the Plan which state that resident and commercial development (beyond that which already has planning permission) is conditional upon various external factors and stakeholders relating to infrastructure. The Council has not put forward a credible plan for how these other factors will be delivered, which makes it highly likely that they will not in fact be delivered. This increases the risk that all that will happen is a very high volume of new residential development without any additional infrastructure to support it.

The Draft Plan is not legal because:

1. it is ultra vires the powers and authority conferred on the Council to permit development on over 10% of the borough's green belt within one round of planning,
2. the Government's funding of the new western river crossing is linked to or conditional upon the Council delivering an excessive scale of development. It is a classic strategy to have announced the "good news" of a new river crossing followed very shortly afterwards with the "bad news" of excessive and unsustainable green belt development. This is a clear sign that Warrington, and potentially some of its councillors, are being "bribed" into pushing through an excessive Local Plan in return for a new river crossing.

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.

Parts of the Plan relating to the Garden Suburb are sound, in that some development is required and has indeed been foreseen for a number of years since the Pewterspear/Appleton Cross developments were built. However, it is the extent of this Plan which makes it unjustified, ineffective and undeliverable.

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.

There is excessive and unnecessary development of residential and employment land on Green Belt land within the proposal for the Garden Suburb in the South East. Modifications that would make the Plan sound are:

1. Part of the development should be relocated to other areas, such as Croft/Culcheth/the North East of the borough, which offer equally good ability to meet the requirements of the Plan.
2. The Garden Suburb as a whole should be scaled back to a level that is justifiable and effective.
3. The Plan should only be put forward once the Council has put forward credible strategies for all related aspects, including school, health, leisure and road infrastructure, rather than deferring these critical aspects as requiring further review/policy/funding and agreement with other stakeholders.

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:
To make it clear to the authorities that the Draft Plan is not sound, and that with modifications it could be.

You have just completed a Representation Form for Policy MD2 Garden Suburb. What would you like to do now?
Please select one option.

Complete the rest of the survey (Part C)