

**From:** [Local plan web form](#) on behalf of [Main modifications consultation](#)  
**To:** [Local Plan](#)  
**Subject:** Local plan main modifications consultation  
**Date:** 05 July 2023 13:51:08

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Submitted on Wed, 05/07/2023 - 11:21

Submitted values are:

## Your information

### Your name

Mark Jervis

### Organisation (if applicable)

Councillor, Appleton Ward, Warrington Borough Council

### Address

[REDACTED]

### Phone number

[REDACTED]

### Email address

[REDACTED]

## Modification response

### Which main modification or consultation are you responding on?

Main Modifications Further Consultation 24 May to 5 July 2023

### Is the main modification legally compliant?

No

### Why do you consider it is not compliant (max 2000 words)

Please refer to my detailed response below and the response dated 26 April 2023 submitted during the first Main Modifications consultation period.

### Is the main modification sound?

No

### Why do you consider it is not sound (max 2000 words)

Please refer to my detailed response below and the response dated 26 April 2023 submitted during the first Main Modifications consultation period.

## Detailed response and document upload

### Detailed response to main modification (A maximum of 5000 words, which equates to roughly 10 sides of A4 paper)

I write in relation to the Council's second consultation on the March 2023 Schedule of Proposed Main Modifications to the Updated Proposed Submission Version of the Local Plan 2021/22-2038/39 (hereinafter referred to as the Plan).

In so doing I have 3 hats:

1. Appleton Ward Borough Councillor since May 2021
2. Appleton Parish Councillor since May 2021
3. Resident of Appleton for the last 35 years.

This response is further to my response sent on 26 April 2023 as part of the initial six week Consultation Period on the Inspectors Main Modifications.

The proposed Main Modifications remain non legally compliant as the scope of Main Modifications proposed by the Council exceeds the delegated authority granted by the resolution of Full Council on 4 April 2022.

Given statements by other interested parties, I wish to reiterate that the 2021 PSVLP as modified by the proposed Main Modifications remains unsound.

I welcome and concur with the Inspectors' proposed deletion of the South East Warrington Employment Area (SEWEA) for the declared reasons that the employment land needs are over stated and that there is a significant adverse effect on the the character and appearance of the area.

In this regard, I welcome that the Council appear to accept this modification. After such a prolonged Local Plan process, there should be no early review of employment land needs (ie within 10 years of adoption of the final Plan).

Employment land demand results from the promotional activities of the Council and its partners together with Warrington's unquestioned strategic location on the national motorway network. This does not justify every major development proposal particularly proposals which would have a profound effect on character and appearance of existing rural hinterland and which result in harm to local residents/parishes.

The SEWEA is one such scheme. The benefits would not outweigh the harm. The planning system, including the NPPF, exists to ensure that

development does not just reflect market requirements but is managed to meet the social, economic and environment objectives of sustainable development. The SEWEA would not be a sustainable development and is outwith various requirements of Paragraph 35 of the NPPF.

The modification to remove the SEWEA should lead to a review of housing need and change in the South East Warrington Urban Extension (SEWUE). Current evidence is weak and further weakened by the proposed deletion of the SEWEA. Any reduction should be focussed on Appleton and Appleton Thorn which are unsustainably burdened with new housing and Green Belt loss in the current draft Plan.

I remain of the view that there are significant residual and unacceptable uncertainties in the draft Plan which make it unsound. The proposed Development Frameworks appear too weighted in favour of the developers. This is already evident in current developments in South East Warrington where extensive new housing completions (Appleton Cross, Stretton and Grappenhall Heys) are not being matched by provision of the necessary new local services.

The Main Modifications fail completely to demonstrate that there is a clear plan to deliver the significant new infrastructure essential to support the new Developments in the draft Local Plan. As such the Plan is unsound due to its failure to provide any guarantee of sustainable growth in the Borough.

One specific example of the unsound proposals is that the draft Plan and the Main Modifications provide no assurance of funding and timely provision of improved infrastructure to address the acknowledged significant shortcomings in the existing crossings of the River Mersey, the Manchester Ship Canal and the Bridgewater Canal in South in south Warrington.