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26 September 2017

Dear Sirs

As a resident of [REDACTED] Grappenhall, the area most affected by WBC's poorly considered and ill-conceived Preferred Local Development Plan 2017 ("PLDP"), I strongly believe it should be scrapped in its entirety.

I believe that the catastrophic loss of Green Belt and consequent irreversible damage to the environment and the historic and semi rural character of the area which would be caused by the intended urban sprawl should outweigh the unsubstantiated purported requirement for new housing and associated development on such a huge and unsympathetic scale.

The resultant traffic congestion, lack of public transport and stress on public services in the area should also mean that the PLDP should not be given any further consideration.

It should also be considered that WBC do not have a mandate from the residents of the areas which will be impacted to impose this wholesale destruction of their communities and the landscape which was believed to be protected as Green Belt.

I would emphasise that people are not only deeply concerned about this PLDP, they are distraught and enraged at the presumption of WBC.

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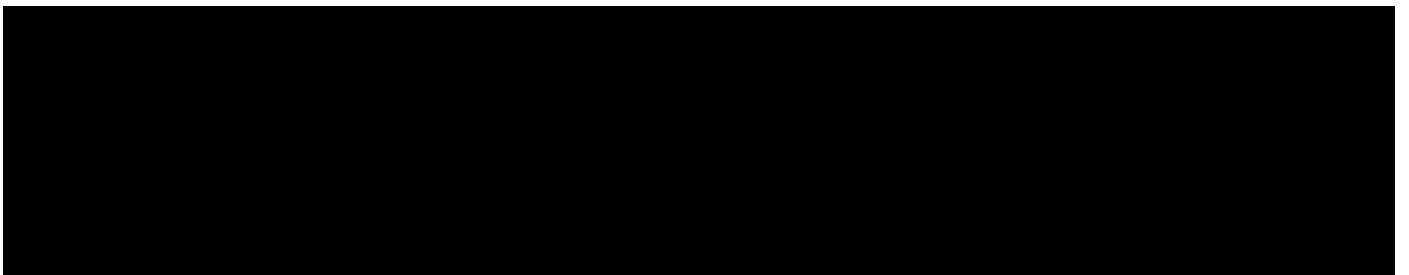
I would urge WBC to listen to its residents, being the people affected and who are absolutely opposed to this PLDP. If I were a member of WBC I would certainly not want to be presiding over this proposal, which will only be remembered as the disastrous sacrifice of one of the only remaining beauty spots in Warrington for yet more unsympathetic and sub-standard housing development for private profit.

### **Inadequacy of the consultation process**

- Timing over the summer holiday period was ill considered and duration is insufficient being only the minimum time required
- No evidence of a communication strategy. Communication has been inadequate with no engagement with residents and no links being forged with local groups or community representatives
- Poor quality of information provision about the PDLP on line and at meetings with illegible and incomplete maps and diagrams
- No advertising was undertaken, no letters to residents issued or street notices posted. Use of the WBC website alone is not sufficient
- Insufficient meetings at inadequate venues were scheduled. Incredibly, there has been no meeting in Grappenhall, the most impacted area
- WBC failed to respond to requests for an extension to the period
- This appears to be a breach of WBC's common law duty of fairness given that WA4 residents will be deprived and made worse off by the PDLP. As someone who lives in Grappenhall in the midst of the proposed housing and new 'garden city' I believe I should have been contacted by letter or telephone personally at the very least

### **Basis of the PDLP and miscalculation of housing needs**

- There is no evidence beyond an incorrect and inadequate financial model to support deliverability or even the demographically required future housing needs
- The assumptions are out of date (e.g. pre Brexit)
- The housing need assessment appears to be based on aspirational employment and commercial growth calculations rather than empirical facts
- There are significant errors and omissions in the PDLP (for instance, Stockton Heath does not appear on any of the maps), and no substantive feasibility studies have been undertaken



- The resultant huge and isolated housing estates which are intended can only become dysfunctional and under resourced and does not reflect how people actually want to live

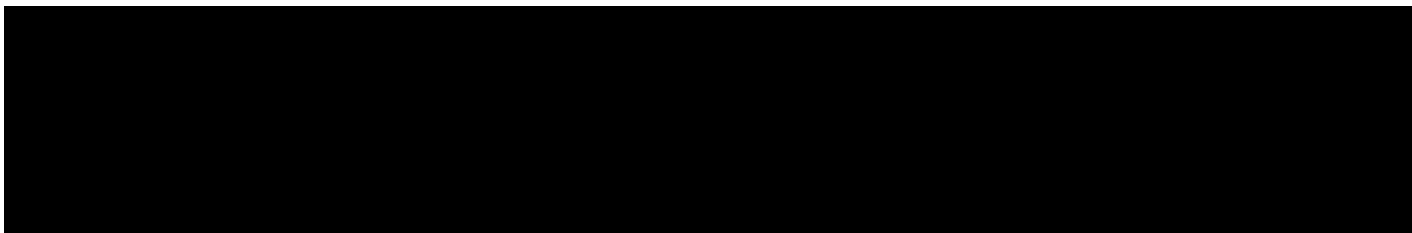
#### **Impact on services and infrastructure**

- There will be increased traffic congestion as a result of the proposed PDLP with potentially disastrous implications for existing traffic routes
- It is incredible that WBC did not commission any detailed assessments or modelling of the impact of the proposed development upon traffic, transport and infrastructure before identifying the preferred option
- This is an area which is poorly served by public transport and there appears to have been no consideration as to how the many thousands of extra residents would be serviced
- It is inevitable that further road building will be required
- I understood that consideration of the sustainability of development was a prerequisite but no consideration seems to have been given to this
- Local services are already under pressure, particularly social and health/ NHS and there will be little money to grow services to meet the needs of Warrington's existing population, let alone the growth envisaged by the PDLP
- Warrington is already in the top ten places in England with a shortfall in the numbers of GPs per capita. Warrington and Halton hospitals were rated as 'requires improvement' in the last CQC inspection and this situation can only worsen

#### **Absence of exceptional circumstances for reclassifying the Green Belt**

- The tests of durability of the Green Belt were satisfied when it was originally designated and there are no exceptional circumstances to justify a change
- The urbanisation proposed will cause irreversible and catastrophic loss of countryside and irrevocable damage will be done to the character and context of the villages in the area
- The proposed urban sprawl, which Green Belt was designed to prevent, is driven by property speculation rather than any genuine justification

#### **Lack of any environmental impact assessment**



- There is no evidence that ecological, transport and air quality surveys have been carried out
- The presence of protected wildlife species in the area should preclude the proposed development, together with the disturbance caused generally and total destruction of habitat
- There is no evidence that a flood risk assessment has been carried out in respect of the inevitable consequences of development on this scale
- The building of the proposed huge numbers of houses and the commercial centre as proposed by the PDLP will bring many thousands of extra cars to the area: to Warrington town centre, to Stockton Heath, to the motorway interchange and ancillary roads and of course to the WA4 green belt
- This will have a huge deleterious impact on traffic congestion (Warrington already has a high reliance on motor vehicles) and a consequent adverse impact on air pollution (Warrington is the second worst place in the north west for breaching air pollution safety levels) and therefore the quality of lives of all residents

#### **Lack of mandate of WBC and councilors, vested interests and lack of transparency**

- There is a fundamental flaw in the assumption that this PDLP can be foisted upon the residents of an area that do not want it and the council was not elected on this basis in 2016
- Warrington town centre is desperately in need of investment to make it fit for purpose and make it attractive to shoppers, employers, workers and users of leisure facilities – why not improve the existing centre rather than building a new one several miles away?
- There are fundamental flaws in the ‘call for sites’ process. This generates interest only from landowners looking to capitalise on their assets and huge corporate entities driven by the profit motive, none of whom have any regard for or involvement in the area, its community or residents
- The lack of disclosure and transparency has resulted in widespread suspicion of process and WBC itself, in particular its links to organisations such as Peel Holdings
- The identity of the parties responding to the ‘call for sites’ and all parties (corporate and individuals) who would benefit from the PDLP should be made public
- WBC has a poor track record in preserving the historic character of Warrington, or of promoting development which improves the town. If the newly

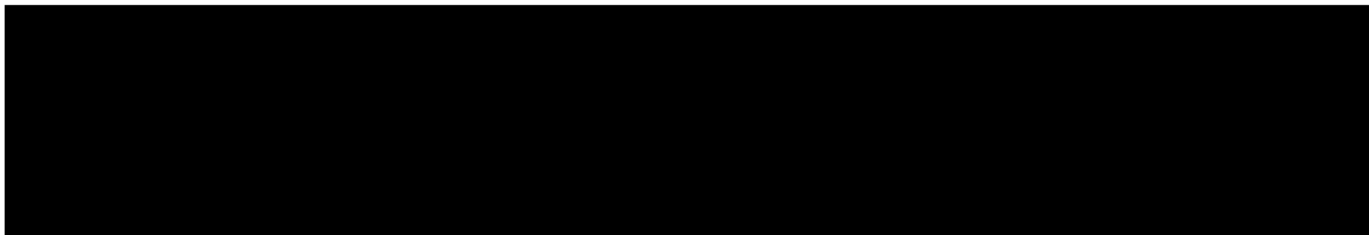
constructed town centre car park is an indication of the aesthetic sensibilities of the planning department then WA4 residents should be very concerned indeed

#### **Inadequate consideration of alternative options**

- The option 2 PDLP is based on the aspiration of WBC to create a 'new city' rather than an objective, independent and expertly assessed need of the town
- There is nothing in the PDLP about how Warrington centre or the north of the town will be improved. The town has experienced significant deterioration in recent years and addressing the quality and attractiveness of the town should be WBC's priority, not promoting urban sprawl
- The PDLP is driven by the desires of land speculators rather than any considered, coordinated strategy to improve the whole of Warrington.
- Nor has the PDLP been led by the communities it will blight with residents vehemently opposed
- There is no evidence that the PDLP is in any way 'joined up' with the needs and plans of the wider borough and surrounding areas in the north west
- Insufficient consideration has been given to other options (specifically the development of brownfield sites where it would be possible to build 15,000 houses and thus protect the Green Belt)
- The proposed so called commercial development will create very few jobs and does not fulfil any actual need for further warehousing in this area
- No independent, expert assessment of the PDLP and the alternatives has been done

#### **Loss of amenity**

- The area around Grappenhall is much loved and used by residents and people from the wider area as a rural amenity. This would be lost if the PDLP goes ahead
- There will be significant loss of greenbelt, landscape, ancient woodland and rural character
- The PDLP will result in the loss, destruction and/or alteration of heritage assets, local village character and context and architectural distinctiveness
- Traffic congestion and disruption to residents will be caused by intensive and destructive building and road works throughout the area and the whole of Warrington



- There is a threat to the Trans Pennine Trail and the potential destruction of a much loved asset to the wider community
- Likewise there is a threat to the margins of the Latchford and Bridgewater canal and the listed bridges which are likely to be lost or altered

Regards

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