



Dear Sirs

**Response to the Warrington Local Plan: Preferred Development Option Regulation 18 Consultation**

I write in response to the current Preferred Development Option (PDO) consultation as part of Warrington's Local Plan Review. I wish to register my comments in relation to the Council's preferred option, the proposals it comprises, and to some of the assumptions on which it is based as set out below. I have chosen not to complete the online questionnaire prepared by the Council as I feel the structure and wording is open to interpretation and a letter enables a more detailed and meaningful response.

**1) I STRONGLY OBJECT to the manner in which the consultation on this Local Plan review has been undertaken and am particularly concerned about the poor quality of information, lack of clarity, consistency and transparency, and the Council's failure to engage with residents as key stakeholders.**

I consider that the quality of the Council's consultation with the public has been completely unsatisfactory for a number of reasons.

- The consultation period was set for the minimum time and was run over the summer holiday period, when many people were away, groups such as parish councils were not scheduled to meet and it is difficult to contact local councillors or indeed council officers. Although an additional two weeks was allowed for Parish Councils, this was not originally the case for residents. After pressure from residents and the local Member of Parliament, the Council agreed to extend the deadline for all until 29<sup>th</sup> September.
- The Council made no direct contact regarding the consultation with local residents, even those whose homes are now blighted and are extremely concerned about their future as a result of the Council's plans. Public advertisement was very limited and obscure.
- The consultation meetings originally planned by the Council did not include any events in South Warrington, the communities most affected by the proposals within the document. A

large number of residents had to travel some distance to other events before the Council agreed to hold a single additional event after pressure from residents and the local MP.

- The quality of information provided has been very poor: plans have been poorly drawn; it is difficult to access and analyse the “evidence” base and assumptions of the PDO; the information contained within the PDO has been very difficult to cross reference with supporting information; information/policy appears to be contradictory both within the PDO and with supporting information; Council Officers appear to have been very contradictory, with information they have given at the consultation events conflicting with what has been in the documents, their press statements and their correspondence with concerned residents; and the PDO appears to have been drafted in a way designed to cause confusion over key, contentious issues.
- It appears that the consultation’s “evidence” base is justified by work from consultancy companies, some of which have undertaken significant work previously for the Council, whilst others are global business/commercial consultancies. Given that at least some of these consultancies have worked for those developers promoting large scale development as part of the PDO, it is difficult to see how this evidence base can be an independent consideration. Furthermore, there does not appear to be any justification for the PDO proposals on an environmental or social basis.
- The PDO has been based on information and evidence sourced in late 2016, mainly from land owners and developers through a “Call for Sites” exercise. I therefore consider that the PDO proposals are being led by speculative property development and a “top down” financial approach rather than by the needs of existing residents across the town and environmental quality. This view is supported by looking at the evidence base as a whole, which is dominated by economic and development related documents, with very limited consideration given to social or environmental issues. By the Council’s own admission, there has also been very little transport assessment work done, and yet it has still chosen to base their PDO on massive infrastructure requirements which will significantly blight affected residents for many years.

The result of all of this is that the PDO consultation document appears very much as a definitive plan, with draft proposals seemingly already determined and there being only limited opportunity to tweak. Existing residents have not been consulted in relation to the plan aims, principles, values or proposals for Warrington. I feel that the Council are reluctantly listening to the views of the people who elected them as they feel they have to rather than actually listening to what they want.

Residents need to be fully informed as to the precise and transparent procedures of public consultation, government guidance on this issue, WBC policies and as to how and by whom the consultations, comments and contributions will be independently assessed for the benefit of quality of life and environment for residents.

I also consider that local communities and residents need to be fully informed as to the identity of those who would / most likely benefit financially from the PDO, or who are actively promoting

it (including the property speculators, property developers, corporate interests, land and property owners and other vested interests, as well as Councillors, decision makers and others). It is understandable that there is some concern about the relationships, whether formal or informal, Council members and officers have with any person or persons likely to benefit from the proposals in any way. The Council could go some way to providing clarity on this issue if it were to provide transparent information.

**2) I STRONGLY OBJECT to the overall policy approach of Warrington becoming a “New City” and proposed Strategic Objective W1.**

I STRONGLY OBJECT to the Council’s desire to turn Warrington into a “New City”, and have found the information contained within the consultation documentation to be lacking in any meaningful justification for it.

Paragraph 4.6 of the Preferred Development Option consultation states that the Council has planned a level of growth over and above baseline forecasts which presents “a unique opportunity to make the transition from New Town to New City”. The consultation document however seems to fundamentally contradict this. It appears the Council has decided it wishes to make the transition to New City and has therefore proposed such a level of growth over and above baseline economic forecasts (Para. 4.5 Preferred Development Option consultation) which will enable it to do so.

The PDO does not answer the question as to why Warrington wishes to become a New City, but simply makes that assumption, which is reinforced by public statements from senior council officers, members of the Local Economic Partnership and others. I STRONGLY DISAGREE with that assumption. That assumption underlies most of the proposals contained within the consultation document and I therefore question the validity of it. Existing residents have not been consulted in relation to the plan aims, principles, values or proposals for Warrington. I consider that rather than be democratically involved in contributing to the future of my town I am forced into the very negative position of OBJECTOR to the Council’s proposals.

The fact is that Warrington is a large, well located town and is currently an attractive place to live providing both local jobs and easy commuter access to the nearby cities of Liverpool, Manchester and Chester. It is not however without issues and I consider the Council’s priority should be to address these and concentrate on ensuring Warrington can become a better, sustainable town for all, without any detriment to existing residents, their health and wellbeing, their employment, their facilities and their environment. I consider that planning for excessive growth of the scale and type proposed simply become a New City will be severely detrimental to all of these things and generate unnecessary urban sprawl.

The PDO also focuses on the proposed development of South Warrington. It makes almost no mention as to how it intends to improve the urban environment and quality of life for the residents of North Warrington or the Town Centre which has deteriorated massively over recent years. I consider that any local plan should focus on improving quality of life and environment for all, bringing the town’s communities together and not further dividing them or accommodating urban sprawl at significant social and environmental cost. I STRONGLY OBJECT to this North/South bias.

There are many documents and recent press articles (local and national) available which refer to Warrington's aim to achieve City status. I am aware of statements from Council Officers in the local press over recent weeks however, which have implied that the current proposals make no reference to Warrington becoming a New City in terms of status, rather the term is used as a "branding" to describe the proposed scale of development and hoped-for growth. The consultation document itself however makes numerous references to a new City status, as indeed do supporting documents, earlier press releases, press articles, Council Officers speaking at conferences etc. Regardless of what was actually meant by the use of the term New City, I believe that Warrington has twice applied for formal City Status in the past and on both occasions has failed. There are therefore clearly ambitions within the Council to achieve this at some stage and the lack of clarity within this consultation has been extremely unhelpful.

3) **I STRONGLY OBJECT to the basis on which the Council has calculated its perceived housing need over the plan period and the figures included in Strategic Objective W1 and throughout the consultation document.**

I STRONGLY OBJECT to the Council's assessed housing need of a minimum of 1,113 homes per annum and its inclusion in Strategic Objective W1 of the Preferred Development Option consultation document. This figure forms the basis of proposals throughout the document and I consider it to be too high for the following reasons.

- On 12th July 2016, the Department for Communities and Local Government (DCLG) released the *2014-based Household Projections: England, 2014-2039, Housing Statistical Release*. This document sets out projected data regarding household and population growth between 2012 and 2037, based on 2014 data. It projects a growth in the number of households within Warrington of between 440 and 840 per annum over the 25 year period from 2012. However, a figure of 839 is the starting point within the Consultation document which the Council has then inflated upwards considerably to 1,113.
- Paragraphs 2.9 and 4.5-4.7 of the Preferred Development Option consultation document state that the Council proposes an annual housing requirement of 1,113 to support the level of job growth proposed in the Cheshire & Warrington devolution bid. I consider this a premature and very speculative assumption to make given that no decision has been made about whether or not this bid will progress, nor has the initial consultation process taken place. Warrington is not currently part of a combined authority, and it may never be so. I therefore consider that the Council's perceived need for 1,113 new homes per annum is INCORRECT as it fails to take this into account.
- The 2014-based Household Projections: England, 2014-2039, Housing Statistical Release 12 July 2016 state that that net migration to the UK accounts for approximately 49% of anticipated population growth (equating to approximately 37% of new households). The document does not provide data by Local Authority area but taking this as an average figure and applying it to the Council's perceived need in Warrington, this equates to almost 400 homes per annum. It may be that the net inward migration figure for Warrington is lower than this, but at even half the national average it equates to around 200 homes (or approximately 18% of the Council's perceived need). These projections are based on data

from before the 2016 referendum vote for the UK to leave the European Union. This will have a major impact on the number of households as there is likely to be a significant reduction in the number of immigrants. I therefore consider that the Council's perceived need for 1,113 new homes per annum is INCORRECT as it fails to take this reduction into account.

- The Council's perceived need for 1,113 homes per annum does not appear to take account of the existing population within the town not currently in employment. It is to be hoped that new jobs created within Warrington would provide opportunities to existing unemployed residents and this would generate less demand for additional homes. The Council accepts this point in paragraph 2.4, but does not state how it intends to address this, nor does its assessment of housing need appear to be amended accordingly. I therefore consider that the Council's perceived need for 1,113 new homes per annum is INCORRECT as it fails to reflect this.
- Paragraph 4.37 of the Preferred Development Option consultation document states that the Local Plan aims to reflect the objectives of the current local plan and to reflect the Housing White Paper's objectives in relation to increasing and accelerating housing delivery. I STRONGLY DISAGREE with this statement as the PDO document does not reference other aspects or objectives of the Housing White Paper, including:
  - Ensuring local communities have more control over where development goes and what it looks like. As outlined earlier in this letter, I believe the PDO put forward by the Council, and the manner in which it has consulted on it, are contrary to this objective of the White Paper.
  - The reiteration of strong protection for the greenbelt and other environmental designations. Again I believe that the nature of the PDO put forward by the Council is completely contrary to this objective of the White Paper.
  - Implementation of measures to prevent the isolation of existing communities and residents and to ensure they are supportive, by building homes that people want to "live alongside as well as in" (Rt Hon Sajid Javid MP). I believe it should be clear from the obvious strength of feeling within the communities across South Warrington that the Council's PDO does not do this.
  - The possibility that Local Authorities delivering homes may be eligible for a further 20% increase in planning fees over and above the 20% already confirmed by DCLG in February 2017. This could be seen as another indication of the Council's PDO assuming a greatly inflated assessment of housing need being led by financial opportunity rather than community, social and environmental need.
- On 14th September 2017 the Department for Communities and Local Government published *Planning for the right homes in the right places: consultation proposals*. This document consults on specific issues emerging from the White Paper including a standard methodology for calculating the level of housing need. It appears that proposals are based on a demographic baseline of DCLG/Office for National Statistics projections of household growth,

adjusted to take account of market signals BUT subject to a capped level of increase to ensure deliverability.

The data tables supporting this consultation set out current housing need figures at local authority level against the likely housing need figures which would result from the new, consistent approach. Interestingly Warrington is one of the few authorities which has been unable to supply data. However, it should be noted that the adjacent Cheshire authorities would both see a significant REDUCTION in the assessment of housing need, as would nearby authorities such as Halton, Manchester or Salford. Given we have been told that Warrington has determined its housing need to support the level of job growth proposed in the Cheshire & Warrington LEP and devolution bid, it is difficult to see how Warrington's need has increased so much, whilst that of the authorities concerned would decrease – unless of course Warrington is simply intended to become an overspill for Chester? I therefore consider it premature for Warrington to be making assumptions which do not take account of this guidance and assessing housing need at what appears to be an excessively high level.

4) **I STRONGLY OBJECT to the loss of greenbelt land on the massive scale required to deliver the Council's Preferred Development Option and the lack of emphasis on the redevelopment of brownfield sites in relation to Strategic Objectives W2, W5 and W6.**

I STRONGLY OBJECT to the loss of valuable greenbelt land as proposed within the PDO consultation. I do not agree that the Council's PDO represents a sensitive release of greenbelt land, or ensures that it maintains its permanence as it suggests in Strategic Objective W2. Furthermore, although I am supportive of the aims of Strategic Objective W5 as written, I do not agree that the PDO proposals will deliver this. I believe that the Council's PDO will actually have the opposite effect, destroying character and local distinctiveness, the countryside and Warrington's unique pattern of green spaces whilst failing to protect, enhance or embrace natural assets. Likewise, the loss of such greenbelt land will be contrary to the aims of Strategic Objective W6 resulting in the opposite of that intended. I therefore STRONGLY OBJECT to loss of greenbelt on this scale for the following reasons.

- I STRONGLY DISAGREE with the methodology behind the Greenbelt Assessment provided as part of the Council's "Evidence" base. The environmental value of individual parcels of land is not the primary concern of greenbelt policy. As set out in Paragraphs 79 & 80 of the National Planning Policy Framework (NPPF) the fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open, to prevent settlements merging into one another, safeguard the countryside from encroachment, preserve the setting and character of towns and to encourage the recycling of brownfield land.

I consider that the Council's Greenbelt Assessment fails to assess the value of the greenbelt as a whole, but simply assesses individual parcels of land. I therefore believe that the cumulative effect will be catastrophic for Warrington in relation to the aims of the NPPF.

- Much of the greenbelt land included within the Council's assessment is currently within agricultural use. This is a vital economic resource for food security and soil protection. It makes a valuable contribution in terms of food production and the sense of well-being an agricultural landscape can provide. In the face of climate change, agricultural land also has an

increasingly important role in relation to carbon storage and flood prevention. I consider that the Council has failed to take these cumulative impacts into account in assessing the value of Warrington's greenbelt.

- Planning policy at a national level, as supported by the Government and Secretary of State in various statements and other documents, determines that the protection and retention of greenbelt is critical and proposals to release land should demonstrate "exceptional circumstances". It also shows that housing and economic needs do not generally override constraints on the use of Green Belt land. I consider that in the PDO document, the Council has clearly put the emphasis on housing and economic growth overriding all other factors including environmental concerns, quality of life and the health and well-being of existing residents etc. It has also failed to demonstrate exceptional circumstances for its proposed release of land from greenbelt. I STRONGLY DISAGREE with this approach.
- Loss of huge swathes of greenbelt land in South Warrington will do little to impact on the quality of life for residents in the north of the town and be detrimental to those in the south. I therefore STRONGLY DISAGREE with the south/north bias of the proposed PDO and its failure to improve quality of life for all residents whether in the north or south of the town.
- The proposed PDO states that it seeks to improve quality of life for existing residents. The existing greenbelt, open spaces, rural lanes, footpaths/cycle ways and woodlands are greatly valued by existing residents for the opportunities they provide. They provide opportunities for physical exercise, sustainable routes and easily accessible recreation, both of which contribute to overall health and well-being. The National Ecosystem Assessment supports the notion that simply seeing an agricultural landscape can contribute to health and well-being. That landscape also contributes to carbon storage, flood water retention and mitigation of poor air quality – something Warrington already scores comparatively very poorly on and which adversely impacts existing communities. I STRONGLY DISAGREE that the loss of greenbelt will make any positive contribution to this.
- The proposed PDO states that it seeks to protect, enhance and embrace natural assets, maintaining Warrington's countryside and unique pattern of green spaces. I STRONGLY DISAGREE that releasing large areas of greenbelt land for development will achieve this, rather it will do significant damage. The green environs around Warrington should be preserved and protected to maintain the unique rural, setting and characteristics of South Warrington and its distinct communities.
- For reasons outlined earlier in this letter in Section 3), I STRONGLY DISAGREE with the Council's assessment of housing need. Accepting that this assessment is significantly higher than it needs to be, the requirement for the release of greenbelt land will be significantly reduced. I therefore STRONGLY OBJECT to the proposed release of greenbelt land as set out in the Council's proposed PDO.
- I STRONGLY DISAGREE that the Council's proposed PDO will provide the right types of housing in the right places to address the needs of the existing residents of Warrington. It proposes that much greenbelt land will be lost to create a garden suburb. From the limited information and numbers provided, it is pretty obvious that this will be far removed from the original

Garden City ideals and significant greenbelt land will be lost to low density, car dependent, expensive housing where high profits can be generated by the "one size fits all" volume house builders. Given the level of infrastructure which would be needed to support their development, houses within this proposed Garden City suburb would need to be of significant value, beyond the means of local residents. There are numerous research sources which suggest that by releasing greenbelt land we are simply releasing more profitable land for developers. This is not what the existing residents of Warrington need.

The PDO consultation makes almost no mention of any improvements or redevelopments required in the existing suburbs, particularly in the north of the town where there are neighbourhoods and housing stock in need of much regeneration. Concentration of effort in these areas and on the significant supply of brownfield land would far better deliver some of the strategic objectives of the draft Local Plan. I **STRONGLY OBJECT** that the Council seeks to provide massive, unaffordable and unattractive housing growth on greenbelt land at this at excessive social and environmental cost.

- I **STRONGLY DISAGREE** with the choice of Arup for the preparation of the Council's Greenbelt assessment. It is obvious that Arup have a very strong working relationship with the Peel Group, one of the key promoters of sites the PDO seeks to bring forward for development in Warrington. Arup have worked with Peel in a range of capacities on many projects throughout the northwest of England, including massive development schemes such as Future Carrington, Liverpool Waters and Wirral Waters.

Peel's Ocean Gateway programme comprises 50 projects along the corridor between Liverpool and Manchester, which includes Warrington and other areas within the Warrington and Cheshire LEP. As well as specific projects such as Warrington Waterfront and Arpley Meadows, the Ocean Gateway website states that Peel has a large portfolio of agricultural and rural land and associated properties held as strategic investments or awaiting development or re-development. Given that this portfolio is even included as one of the 50 Ocean Gateway projects, it seems safe to assume that the intention is development rather than retention, especially when considered in light of Peel's response to Warrington's Call for sites in late 2016.

I therefore consider it is disingenuous for the assessment of value of greenbelt sites in Warrington to have been prepared by a consultancy with such close working relationship with an organisation actively seeking the release of greenbelt land for development.

In light of all the comments above, I **STRONGLY OBJECT** to the loss of greenbelt land as proposed in the PDO as I do not consider that the Council has demonstrated the required "exceptional circumstances" required by planning policy. I also draw comparison with the Local Plan review in Manchester, which has now been halted to allow for revisions to the excessive amount of land proposed for release from Greenbelt.

- 5) I **STRONGLY OBJECT** to the Council's Preferred Development Option on the grounds of traffic and transportation matters, in relation to Strategic Objectives W4 and W6 in particular.



Strategic Objective W4 of the proposed PDO states that the Council seeks to provide new infrastructure to support growth, reduce congestion and promote sustainable transport options, whilst reducing the need to travel. Although I am supportive of the aims of Strategic Objective W4 as written, I DO NOT AGREE that the PDO proposals will deliver this. Likewise, I DISAGREE that the Council's PDO will deliver the outcomes sought by Strategic Objective W6, especially in relation to air quality. My OBJECTIONS are based on the following points.

- The PDO consultation document omits details of the huge traffic and transportation issues and implications for the town. I understood from my conversation with Council Officers at the consultation event in Lymm, that although the exact routes and locations of new roads shown in the PDO document were yet to be determined, this level of new infrastructure would definitely be needed (including a new high-level crossing of the Manchester Ship Canal at Latchford) to support the growth being proposed. This seems to conflict with information given subsequently by the Council's Executive Director for Environment and Regeneration who has said that no detailed traffic/transportation modelling had been prepared thus far but would be commenced soon. It has been impossible to determine whether the Council intends to carry out this work for all of the development options, or just its preferred option. I STRONGLY OBJECT to this lack of consistency amongst Council Officers and am also concerned about the validity of the consultation as a result.

There is certainly no available evidence that any traffic modelling has taken place as yet and as such the implications of the proposed PDO are impossible to assess fully. The traffic implications of the proposed PDO are potentially disastrous for both South and North Warrington, particularly around Latchford and West Thelwall. I STRONGLY OBJECT to any plan for Warrington being progressed without full, unbiased and independent assessment of the traffic and transport implications which addresses issues such as residential amenity, air quality and environmental concerns as well as the economic growth issues so central to this consultation.

- I also STRONGLY OBJECT to Paragraph 5.32 of the Preferred Development Option consultation which refers to the need for a new network of distributor roads for significant additional infrastructure to support new housing development on such a scale as envisaged. As outlined in section 3) above, I consider the Council's assessment of housing need to be excessive and hence I also STRONGLY DISAGREE with the level of infrastructure the PDO states is required to support this.
- I STRONGLY OBJECT to the lack of detailed plans and incomplete or conflicting information contained within the consultation. The key which accompanies Figure 7 of the Preferred Development Option consultation makes no reference any potential high-level crossing over the Manchester Ship Canal or new strategic roads. There is however a blue dotted line which skirts around the south-eastern corner of the town, along part of the TransPennine Trail and crosses the Manchester Ship Canal at the currently disused high-level bridge near Latchford Locks. Paragraph 5.32 of the Preferred Option document states that a new high-level connection across the Manchester Ship Canal "*may*" be needed in order to achieve the "*full development potential*" of the area but I can find no further reference.

However, this same line is shown on Figure 3.6 of the *South Warrington Urban Extension Framework Plan*, which proposes use of part of the TransPennine Trail as a strategic bus route and a proposed strategic road route and includes a crossing over the Manchester Ship Canal. This diagram does not label this route as a “*Potential Link*” but identifies it as a “*Strategic Road*”. The Framework document has been made available as part of this consultation and I OBJECT to the fact that the detail it contains is omitted from the Preferred Development Option. At best, this is simply confusing for local residents and at worst, could be seen as a deliberate attempt by the Council to “hide bad news” and avoid negative consultation responses.

This is clearly contrary to the rhetoric from Council Officers over recent weeks, both at the consultation event I was able to attend and in the local press. BUT it is shown in Figure 10 of the PDO document as a Strategic Road route and paragraph 5.7 does state that the Council has longer term aspirations for a new ship canal crossing.

- I STRONGLY OBJECT to the fact that the Council’s PDO appears to concentrate supporting new growth rather than the need to improve the quality of life for existing residents. Strategic Objective W4 talks about new infrastructure to support growth and reduce congestion, but it is difficult to see how a massive increase in the number of houses in the town can significantly reduce congestion, especially when taken in the context of likely additional traffic generated by the opening of the new Runcorn Bridge and the introduction of the toll charge.
- I STRONGLY OBJECT to the lack of consultation with public transport providers or those who manage sustainable routes such as Sustrans. The input of these organisations should be critical to any development proposals and yet it seems that the Council is preparing development options without taking the practicalities of this into account. If the Council is seeking to create 7,000 new homes in a new Garden City Suburb with sustainable transport links to the town centre there are significant capacity issues for providers – assuming of course most of these new householders would not simply see South Warrington as handily located for the motorways and commute out of town.
- I STRONGLY OBJECT to the PDO’s failure to acknowledge that a significant proportion of people living in the proposed new homes in South Warrington are likely to commute out of town for work given the proximity of the major motorway junctions. There are already significant issues with approaching the motorway at peak hours, not necessarily as a result of the existing road network leading to it but simply because of the capacity of the motorways to receive additional traffic. This is especially true of the M6/M56 junction and is something outside the remit of Warrington Borough Council.
- I STRONGLY OBJECT to the Council presenting the alternative options to its PDO as being inferior in terms of road and infrastructure delivery. I would comment that even their preferred option appears to offer no solutions to the “Bridgefoot” problem in the centre of town. Even without the massive amounts of proposed residential development and the development of a huge distribution centre and other employment uses in the centre of town at Warrington Waterfront, traffic across the town centre fails to function appropriately.

The Council does not address the existing situation in any of its proposals and simply states that adding more development will bring more infrastructure. Surely those promoting new development can be obliged to contribute to the needs generated by their own scheme, but they will not want to be responsible for funding the inherent problems of the town and the years of underfunding. More development might create more infrastructure but the underlying problems still remain and the situation will continue to deteriorate. It leaves residents feeling the Council is trying to direct them into supporting the option with most new infrastructure or else nothing will change. There is actually no evidence to support that the Council's preferred option will go anyway to resolving the existing issues.

- I STRONGLY OBJECT to the principle underlying the whole of the PDO consultation document that not only will new roads be needed to support growth but that building new roads will "make things better" for everyone.

There has been significant research over the years which has demonstrated that more road capacity leads to more road traffic. The Transport for Quality of Life (TfQL) report *The Impact of Road Projects in England* researched the impacts of completed new road schemes and compiled a significant body of evidence to demonstrate that new road schemes:

- generate additional traffic, often far over and above background trends over the longer term;
- lead to significant and permanent landscape and environmental damage; and
- show little economic benefit to local economies.

There is no evidence within the Council's PDO to suggest these factors have even been considered and again the Council is not being driven by existing local needs. I am therefore concerned that Warrington faces a dead-end of increasing traffic, increasing congestion, unnecessary environmental damage, and increasing urban sprawl which is as bad for productivity as it is for quality of life.

- I STRONGLY OBJECT to the impact of an expanded road network and increased traffic on Warrington's air quality and to the lack of information within the consultation document. Local Plan proposed Strategic Objective W6 states that the PDO should make a positive contribution to improving Warrington's air quality.

According to information from the Council's website, in 2015, the Council's own air quality monitoring found that 60% of the 47 sites monitored for air quality had Nitrous Oxide pollution in excess of their target levels. This represented a significant increase from 17% of sites the previous year. In 2016 the World Health Organisation said that Warrington was the second worst place in the North West for breaching air pollution levels. This clearly indicates a reliance on road traffic throughout an area surrounded by three motorways, even with our greenbelt in place. Without this greenbelt and with an increased level of traffic and congestion, it is likely that air quality will worsen across the town as a result of the PDO proposals.

Air pollution is recognised as having harmful effects on human health, the economy and the environment. It can impact on everyday life, affects everyone and can significantly increase pressure on local NHS services. In 2013 it is estimated that 4.8% of all deaths in Warrington were caused by manmade particulate pollution. This is above the regional average. If this number of deaths were caused in some other way, there would be outcry and the Council would be doing everything it could to reduce this number, not adding to the problem as appears to be the case here.

- I **STRONGLY OBJECT** to the lack of consideration given to the environmental, ecological and heritage implications of new road infrastructure and the need for new crossings over the Bridgewater and Manchester Ship Canals this would require. The Bridgewater and Manchester Ship Canals are both of important heritage assets which generate physical, environmental, economic and social benefits, contributing to the health and well-being of local communities and local character and distinctiveness.
- I **STRONGLY OBJECT** to the impact of proposed road schemes and/or bridge crossings on existing residents whose properties will be adjacent to these proposed strategic links. There will be harmful health effects as a result of increased air, light and noise pollution, as well as significant impact on quality of life. There will also be a significant economic impact on individual households as a result of this. Indeed, many are already seeing their properties blighted by the uncertainty, this in itself can be a key contributor to health and well-being issues and the Council needs to be fully responsible for this.

**6) I **STRONGLY OBJECT** to any proposals which would have a negative impact on the TransPennine Trail, which is a unique and valuable environmental and community asset.**

- The TransPennine Trail (TPT) is a unique and valuable environmental and community asset which should be protected and retained. The section through Warrington is a crucial part of this unique coast to coast link and offers opportunities for informal recreation, sustainable linkages, exercise and education regarding the natural environment. It offers these opportunities free of charge to all. It is mainly traffic free and level so is safely accessible for everyone, whether on foot, cycle or horse. The TPT therefore makes a huge contribution to the health and well-being of the local population. On this basis, I **STRONGLY OBJECT** to any proposals which would limit access to this unique resource.
- The TPT also has a crucial role to play in protecting and enhancing local biodiversity and ecology, providing habitat for many different species of plant and animal life including bats and owls which can often be seen or heard on the trail in the Thelwall area. I therefore **STRONGLY OBJECT** to any proposals which would have a negative impact on this crucial role.
- The TPT is an amazing resource and is a key contributor to the character of the South Warrington area. Indeed, it is one of the reasons I chose to live here. It is what makes it different to living in the endless suburbs of the city, with the token man-made and poorly maintained open space. I am deeply concerned that the Council is proposing the potential use of the route for traffic and that the loss of such a resource seems not to be a contributing

factor to their plans. Furthermore, when one considers all the other local authorities that benefit from the TPT across the country and those individuals who benefit from supporting it, what signals are the Council sending by happily destroying it. I therefore STRONGLY OBJECT to any proposals which seek to alter the nature, character or use of this route.

- The information provided as part of the consultation about proposals for use of the current TPT line as a strategic transport route is at best confusing and at worst deliberately misleading (as set out in sections 1) and 5) above). Based on the scant information which is provided though it appears that a strategic route is proposed along this section of the TPT through Thelwall and Latchford, crossing the Ship Canal at the currently redundant high level bridge. There is no publicly available modelling work or further detail about this which I can find, and therefore residents have no option but to draw a number of conclusions as follows:
  - The TPT is only a footpath wide along the top of the embankment through Thelwall and Latchford. For this to be used as a strategic route, whether for all vehicles or a bus only route, it will need to be significantly widened which will make it extremely expensive, both financially and environmentally. I consider that any cost of this significantly outweighs the benefit and there is nothing to be gained, only lost.
  - Any widening will require compulsory purchase of a large number of existing homes. I STRONGLY OBJECT to this as being against the objectives of the draft local plan to improve housing and quality of life for residents, sustainability, green routes etc etc.
  - Any route will need to be at high level to enable it to cross the Ship Canal without the delays caused by the need to swing the existing bridges. Residents whose homes remained adjacent to or close to any new route would find themselves below the level of the road with significant issues of noise, air and light pollution and a huge reduction in the quality of their life. There would need to be means of access and egress from any new route, each with land take requirements and potentially making the town centre even more difficult to access than it is currently, especially by bicycle or bus. Strong communities are likely to find themselves divided and segregated by large scale road development making access to local facilities difficult. The Council should be in no doubt as to the strength of the communities it says it is so keen to protect and encourage given the reaction they have faced to these proposals which would destroy them.
  - I would be impossible to deliver such a route without such economic, social and environmental damage to the TPT. I therefore STRONGLY OBJECT to its use as a strategic route for buses or cars.
  - I would be FULLY SUPPORTIVE of plans to reinstate a link over the Ship Canal for pedestrians and cyclists, providing a traffic free, sustainable route for existing residents into the town centre, linking in to the current TPT and removing cyclists from the existing swing bridges. I suspect however, that this is not something which feature within the Council's thought process in determining the options presented.

- I STRONGLY OBJECT to the response of the Council to concerns about the TPT and a high level bridge crossing as part of the consultation and consider it unreasonable for Council Officers to accuse some local residents of “scaremongering”. Given the void of information, inconsistent documents, conflicting comments from Officers and all the other factors outlined in Section 1) of this letter, it is only reasonable for residents to make these assumptions and to raise their concerns. This should surely be part of the democratic process of inclusive planning.
- Despite Warrington Borough Council having a named contact officer on the TPT website, I understand from conversations with TPT Head Office that they were completely unaware of any proposals to redevelop the section of the trail through Thelwall and over the Ship Canal to Latchford as a Strategic Link Road until they were notified by residents contacting them. I STRONGLY OBJECT to this lack of consultation with directly involved organisations.

**7) I STRONGLY OBJECT to the failure of the Council’s PDO consultation to give due consideration to the environmental impacts of development on the scale proposed.**

- I STRONGLY OBJECT to the lack of information within the consultation document regarding the impact of an expanded road network and increased traffic on Warrington’s air quality. Local Plan proposed Strategic Objective W6 states that the PDO should make a positive contribution to improving Warrington’s air quality. As detailed under section 5) above, Warrington has a poor record for air quality which has worsened over time and performs badly when compared to other areas in the NorthWest. This situation is likely to be worsened by the extensive growth envisaged by the Council’s proposed PDO.

Air pollution is not only recognised as being harmful to human health, but as having an adverse impact on local ecology too. It can be directly harmful to the health of other species and cause significant damage to their habitats and food supplies. It can also be detrimental to the human food chain. I therefore STRONGLY OBJECT to any proposals which will make Warrington’s position regarding air pollution either worse or maintain the current situation. This is unfair to all existing residents.

- I STRONGLY OBJECT to the lack of consideration the PDO has given to issues of light pollution and the detrimental impact excessive urban growth will have on this.

Light pollution refers to artificial light where it is neither wanted nor needed. Research by the Council for the Protection of Rural England (CPRE) has found that light pollution can cause significant distress to humans, including disruption to sleep patterns and production of melatonin. There is also increasing awareness of the impact that light pollution can have on wildlife, including migration, reproduction and feeding patterns and those species we think of as being nocturnal.

The CPRE’s Nightblight maps show the level of radiance shining up into the night sky and categorises this in to broad colour bands on a scale of “darkest” to “brightest”. The map for Warrington shows that there are no areas in the darkest three categories, whilst the

proportion of sky in the three brightest categories is over double the average for Cheshire and even higher when compared to regional and national figures.

Warrington already therefore performs poorly in terms of light pollution. It is clearly visible from the maps that the darker areas of the town are around the southern and eastern boundaries. Excessive urban expansion into these areas will significantly increase light pollution in these areas (as well as additional light pollution from vehicles) and I am DEEPLY CONCERNED about the negative effect this will have on residents and wildlife.

- I STRONGLY OBJECT to the lack of consideration the PDO has given to issue of noise pollution and the detrimental impact of excessive urban growth and development of new strategic road links, bridge crossings etc will have on this. Noise pollution can cause significant distress to humans, their sleep patterns and their health and well-being, as well as having a detrimental effect on wildlife.
- I STRONGLY OBJECT to the lack of consideration the PDO has given to the implications of the loss of agricultural land and greenbelt for soil carbon storage, soil quality and the negative impact on ecosystems and food security and productivity. These issues are not given any consideration in the options presented within the consultation document, nor the Council's Preferred Option.
- I STRONGLY OBJECT to the lack of consideration given to the flooding and drainage implications of each of the options within the consultation document and the detrimental impact this will have on existing communities.
  - Development on the scale envisaged by the consultation options will have significant impact on surface water drainage across the town. Heavy rain showers already lead to flooded roads in South Warrington and as a resident I often have to find an alternative route around them. Drainage and sewer capacity would obviously be fundamental to new residential development, but developers will be seeking to provide new to enable their own schemes to the required level, not resolving the existing issues across the town. I therefore question the capacity of the existing system.
  - I am DEEPLY CONCERNED as to where surface water drainage from new large scale development would go. Perhaps this is another commercial opportunity to charge for drainage into the Bridgewater and Manchester Ship Canals? The Council has not presented any capacity information or analysis as part of the consultation. There are two small brooks running through Thelwall which are shown on the Environment Agency Flood Maps as "main rivers" and I STRONGLY OBJECT to any proposals which would increase run off into these watercourses.
  - I STRONGLY OBJECT to the implications of removing such a significant amount of land from green belt for development, in terms of water storage and flooding and the creation of additional run off. Many of the fields in the greenbelt to the south of the town remain water logged for days after normal periods of rain, without the additions of massive areas of hard surfaced development and infrastructure. As outlined in

Section 3) above, I consider the cumulative effect of the development of so much open land will cumulatively have a catastrophic impact on flooding and drainage.

- I further STRONGLY OBJECT on the basis that the Environment Agency have recently completed millions of pounds worth of flood defence works to protect Warrington from river flooding. These works will not have considered the effect of thousands of new homes and the loss of many hectares of open land. Although many of the sites identified within the Council PDO proposals are not situated themselves within an area of high flood risk, it is difficult to see how the run off from them cannot cause issues for flooding and drainage elsewhere.
- I STRONGLY OBJECT to the massive damage the Council's PDO proposals would inflict on local flora and fauna, through the significant loss of, and damage to, habitat and the stifling of biodiversity. Warrington has unique assets, both within the urban area such as the TPT or the Bridgewater Canals as well as in the semi-rural and rural areas around it. The town should embrace these and use them as its unique selling point – not seek to destroy them so it can accommodate sprawl and look like everywhere else. It is impossible to provide genuine alternatives and replacements through the Council's PDO.

Although the Council's PDO proposals talk about the provision of new green spaces and linkages within the key development areas, especially within the proposed Garden Suburb, huge swathes of open or agricultural land, mature trees, ancient woodland, hedgerows, mature road verges etc will disappear as a result of development. Man-made, "value engineered" alternatives will go no way to replacing these and our ecosystems and sustainability will suffer as a result.

8) I STRONGLY OBJECT to the failure of the Council's Preferred Development Option to acknowledge the contribution Warrington's waterways make to the town's physical, social and economic health and well-being.

The Bridgewater Canal links Warrington to a national network of inland waterways which is enjoying visitor numbers as never before. As well as providing health and leisure opportunities for local residents and the environmental and ecological benefits it delivers it is crucial to the local character and distinctiveness of the communities in South Warrington through which it passes.

The PDO makes almost no reference to it. It certainly fails to acknowledge the opportunities the Canal could bring to local communities through provision of services to visitors/boaters, nor does it acknowledge the opportunities for the "added value" (ie not just financial) that high quality, sensitive waterside design and uses can generate in the context of a vibrant, sustainable and attractive waterway environment. Clearly the former needs the latter but the PDO actually seems to be missing the opportunities this presents by proposing additional bridge crossings and traffic which will harm the waterway corridor environment and promoting alternative uses on sites currently used for waterway related business.



I therefore STRONGLY OBJECT to the fact that the Council does not consider this unique asset, or other waterways in the borough as worthy of protection through promoting a PDO which will only cause harm to it.

**9) I STRONGLY OBJECT to the potential effects of the Council's Preferred Development Option on the health and well-being of the existing population of the town of such huge development, additional traffic and loss of greenbelt on such a scale.**

Other sections of this letter express concern about the negative impact of the Council's proposed PDO on the health and well-being of Warrington's population. Although I wish to note my key concerns here, I will not repeat my justification/explanation but ask that this is read in conjunction with my comments elsewhere.

Decline of the physical and social environment; removal of community or environmental assets; ecological damage; increased pollution; poor quality public realm; and, the closure of needed and/or life enriching facilities across the town will lead to a further decline in the health and well-being of the resident population. As I have stated repeatedly above, all of these factors will have a detrimental effect on the health and well-being of the existing population, contrary to the aims of the wider public policy environment and I therefore STRONGLY OBJECT to the Council's proposed PDO and alternatives on this basis.

In South Warrington at least, I would further comment that the health and well-being of many residents has already been detrimentally affected by the manner in which this consultation has taken place to date. The scale of the proposals, and the uncertainty around them has resulted in a considerable amount of stress with many concerned about the future of their homes, neighbourhoods and quality of life. An attractive area isn't quite so attractive when you take away the things that make it attractive in the first place and replace them with unnecessary things many people do not want! I am DISAPPOINTED that the Council feels it appropriate to create such stress and worry for people before it has a justified preferred option and alternatives. I also query what it will do to compensate those which will be so badly affected by the proposals ultimately, let alone by the impact of the consultation process.

**10) I STRONGLY OBJECT to the Council's Preferred Development Option on the basis of deliverability and viability, in particular in relation to the scope and scale of new community and transport infrastructure required to deliver it and the Council's lack of ability to deliver the ongoing maintenance of it.**

- To deliver the Council's proposed Preferred Development Option would require a massive amount of new infrastructure including major new roads; new bridges across the river, canals and the railway; increased maintenance requirements; improved motorway junctions; massive drainage and flood resilience works; creation and/or maintenance of new open spaces and public realm; creation of new foot paths and cycleway; land reclamation; mitigation for loss of natural habitat; creation and ongoing maintenance of new schools; medical facilities; increased and improved hospital capacity; and other community facilities.

- I do not believe that the level of capital expenditure required to deliver this is achievable and nor will the level of funding required be met from the proposed development, even if it were all to go ahead. This view is supported by this week's announcement from Moody's Public Sector Europe that Warrington is the only local authority subject to its rating being downgraded by two notches and is one of only 2 authorities to retain a "negative outlook" reflecting increasing contingent liabilities linked to capital and treasury investment programmes.
- Even if it were possible to secure the required capital funding, I fail to see how an authority already so short of funds to look after and maintain existing infrastructure and facilities, will be able to maintain additional new ones. I appreciate that the Council will be in receipt of additional funds reflecting the higher population and greater rate earning potential, but those will be used to cover the cost of the provision of the additional facilities in new communities. It will do little to deal with the backlog of neglect elsewhere in the town and potentially make things worse as spending is reprioritised to deliver the Council's desire for growth.
- I am also aware that the delivery of new homes could open up opportunities for additional Council income through increased planning fees, or Government Programmes such as the Housing Infrastructure Fund. The former will simply reduce the viability of schemes when it comes to negotiating CIL or s106 contributions with developers, whilst the latter is a limited pot for which there will be much competition across the country.
- I therefore STRONGLY OBJECT to the Council's proposed PDO on the grounds of realistic viability and delivery of all the upfront infrastructure required to enable what I consider to be unnecessary levels of development the Council is seeking.

**11) I STRONGLY OBJECT to the proposal to create a Warrington Garden City Suburb and the implications this would have for existing communities and settlements, existing natural /community assets, the local and wider environment and sustainability.**

Paragraph 5.31 refers to a more detailed Development Concept for the area. Although it is unclear from the information available to me, I assume that this is the South Warrington Urban Extension Framework Plan Document, Final (June 2017) prepared on behalf of the Council by AECOM. This document states that it has been prepared as a framework plan and conceptual masterplan for the South Warrington Urban Extension Area (SWUEA) to help the Council confirm the SWUEA as part of its Preferred Option.

- This Framework Plan fails to address whether or not the SWUEA is the most appropriate option for the future of Warrington and its residents, rather it address how the SWUEA could potentially be delivered. The general concept of the SWUEA is therefore presented throughout as a "done deal". I STRONGLY OBJECT to this assumption that the creation of the SWUEA or the Warrington Garden City Suburb is the only way of delivering Warrington's needs.
- I STRONGLY OBJECT to the selection of AECOM as the Council's consultant for preparation of this framework for the Garden City Suburb. AECOM have undertaken other pieces of work for Warrington Council and whilst I accept that there may be cost efficiencies for the Council

in this, I am concerned that the PDO proposals currently being consulted upon have been prepared by a commercial consultancy and are not based on local need. This concern is heightened by: the number of publicly available reports, press articles etc in which AECOM has repeatedly sought the release of greenbelt land for development nationally; and, the relation AECOM has with the Peel Group, one of the key promoters of sites the PDO seeks to bring forward for development in Warrington.

- I STRONGLY OBJECT to the Council's preferred option for the creation of a Warrington Garden City Suburb as set out in Paragraphs 5.28 to 5.39 of the consultation document for the reasons set out below. Details as to the nature of my objections in each of these areas are set out earlier in this letter in the relevant topic section.
  - Housing Numbers - Paragraph 5.28 refers to the development of approximately 7,000 new homes in the area. I STRONGLY DISAGREE with this figure within the context of overall housing need and the assumptions it is based on for reasons set out earlier in this letter in Section 3).
  - Loss of Greenbelt – Paragraph 5.28 also proposes that 950 of the 7,000 new homes proposed in the garden suburb are built on land outside of the greenbelt – ie 6,050 homes are proposed on greenbelt land. I STRONGLY OBJECT to the loss of greenbelt land on such a scale as set out in Section 4) of this letter.
  - I note that all of the photographs in the SWUEA Framework document used to illustrate the strengths and benefits of South Warrington are of lovely rural views and landscapes – which will completely disappear if development occurs as the Framework suggests. I consider this to be somewhat misleading.
  - I DO NOT AGREE that the Council's proposed PDO will deliver the right houses in the right places, and certainly in the proposed Garden City Suburb Area this will not be done in a manner consistent with local plan strategic objectives.
  - I STRONGLY OBJECT to the effect the massive increase in traffic will have on the area and the impact on residents' health and well-being as well as the physical environment.
  - I STRONGLY OBJECT to the detrimental impact of the proposed development options on the natural environment through loss of habitat and increase levels of pollution.
  - I STRONGLY OBJECT to the scale of development within this proposed Garden City Suburb. The results of development on this scale will be contrary to the Strategic Objectives of the draft Local Plan, leading to urban sprawl and loss of local distinctiveness, loss of community and loss of character and identity of existing areas which will simply be swallowed by faceless mass house building.

## CONCLUSION

Having regard to all of my comments above, I consider that none of the options presented by the Council are fully considered or evidenced to enable a deliverable, sustainable plan centred on the needs of the town's existing community and environment. I therefore register my STRONG

**OBJECTION** to all of the presented options as I believe they are fundamentally flawed, presumptuous and are being driven by private sector property speculators and developers.

I trust that you will nonetheless give my comments due consideration and look forward to hearing from you in due course.

Yours faithfully

