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27 Sept 2017

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FOR THE ATTENTION OF WARRINGTON BOROUGH COUNCIL

I am writing to strongly object to the current development proposal and the principal reasons for objecting to the PDO are:

1) **Lack of notice and consultation; totally inadequate information provided**
   a) The consultation process has been not only inadequate and badly communicated, but lacks up to date information on which assumptions are made on housing numbers.
2) **Lack of clarity of information to object to**
   a) Information is unclear as to which homes are affected. Conflicting information has been given by different WBC representatives for example on who and how many are affected by compulsory purchase. We are right next to the embankment and would be negatively impacted and have had no communication from WBC.
3) **No need for city status - it is a flawed vision and not wanted**
   a) There is no desire in Warrington to be a city. What is wanted is a sound town with decent transport infrastructure.
   b) The legal challenge to the previously adopted Local Development Plan was premised on the plan not properly reflecting the OAN and affordable housing requirement. However, the PDO is stated to be "Option 2" – this is based on the aspiration of the Council executive to create a "new city", it is not the independent, objective and expertly assessed need of the town. The data used by the officers to derive the housing need is highly sensitive to the interrelationship between employment, population demographics and dwelling occupancy. The assumptions used appear to have been selected to justify a higher housing requirement significantly above the OAN and do not appear logical, consistent or robust. Option 2 is based on an excess employment and economic growth outlook that is based on very hihigh-

levelssumptions and considerations completely outside the control or influence of WBC, and ignore the competing aspirations of adjacent and further afield boroughs and housing areas.

4) **Disputed housing assumptions and brownfield land needs to be used not green belt**
   a) WBC should have learned from earlier consultation stages and, rather than invite the easy building over the Green Belt, evolved a constrained development option driven solely by the innovative regeneration of brownfield sites to meet anticipated demographically required housing needs.
   b) The Green Belt satisfied the tests of durability when it was designated and WBC have presented no exceptional circumstances to justify a change.
   c) There is no evidence beyond an incorrect and inadequate financial model to support deliverability of even just the demographically required future housing needs.
   d) The PDO document is very technical and references certain key numbers as given "fact" without direct links to the source material or considering alternative calculations.
   e) The Objectively Assessed Needs (OAN) is cited on p.5 of the PDO as 839 new homes per annum - but this was based on 2012 surveys. Before publishing the PDO, WBC were in possession of an updated May 2017 report based on 2014 data which shows a comparable figure of just 738 homes per year (but could be as low as 679 homes pa), but this number has been ignored. As the 839 is taken as the base for the higher Economic Development Needs Assessment (EDNA), then if the 839 is a significant overstatement, so must be the EDNA. The lower number is more consistent with the 716 homes pa average until 2039 within the latest ONS live tables which could be used to underpin the Government's proposed formula for calculating OAN published in September 2017.
   f) The PDO should have been prepared based on the May 2017 addendum (or at very least stated at outset that it was based on out of date estimates that had subsequently been shown to be significant overstatements).
   g) There is no recognition of alternative assumptions and so the broad range of potential outcomes, particularly those with much lower housing requirements.
   h) The housing requirement should be based on a calculation of OAN that is consistent with the methodology and data underpinning the Government's September 2017 proposals for a nationally consistent approach. Any higher levels of development should be clearly and separately identified as excess to Needs and so subject to a much higher standard of justification and challenge.
   i) WBC should produce a ten-year plan, by which point we will be much clearer of the economic and migratory impacts of Brexit, the impact from any completed national infrastructure initiatives and what the consequences of technological change have been on work and home life (and balance). It would also allow for the decommissioning of Fiddlers Ferry and so the availability of an enormous brownfield site requiring regeneration.
   j) Paragraph 83 of The National Planning Policy Framework indicates that established Green Belt boundaries should only be altered in "exceptional circumstances". There is no definition of "exceptional circumstances". WBC indicated on page 15 that they believe that these are exceptional circumstances, but their reasoning is unclear. • This land is not 'spare' land, it is actively being used for agricultural purposes. In the current context of uncertainty following 'Brexit' and broader climate change, using no greenbelt land, or at least a smaller portion of it, should be considered. **Brownfield sites should be exhausted before any building is permitted on Green Belt Land.**

5) **Funding**
   a) Will property developers fund some of infrastructure? It is not clear how this will be funded.

6) **Traffic and transport**

7) This proposal doesn't solve traffic in fact drives more through Knutsford Road, Latchford.
8) Stockton Heath is already over capacity. Stockton Heath is not mentioned specifically in the PDO but the impact of the Garden City Suburb and the Warrington South West Extension on this village will be enormous. The traffic lights at the junction of the A49 and the A56 in Stockton Heath are already operating at capacity and the A49 flowing through the village is frequently at a standstill.
9) Traffic issues and geography • A high level traffic survey has not been included in the PDO. • Warrington is uniquely positioned close to the M6, M56 and M62 motorways. The growth of Warrington has often been attributed to its proximity to the transport network. But Warrington is affected detrimentally whenever there are problems on the motorway network
10) The PDO includes several routes which cause grave concern. These routes will result in the deterioration of the quality of life for current residents who will be subjected to increased noise, air pollution and vibration from the increased traffic flow: o The 'Eastern Link Road' from M56 Junction 10 to the north of the Manchester Ship Canal would cut right through the proposed new residential areas. On the downside, this would provide a new HGV access road to the Barleycastle Trading Estate (which, now, is only accessible from the M6 junction). It would also provide an alternative route for traffic caught up in problems on the M56 / M6 motorways.
11) The PDO also suggest the use of an old railway embankment and bridge to the west of Latchford Locks as a new strategic transport route. Again, this route would be detrimental to the people currently living in this area. The "Howshoots Link" from Grappenhall Heys to the M6 junction would effectively become an alternative HGV route for traffic coming to/from Warrington and Runcorn areas, leading to even more traffic flowing through the A49 and A56 in Stockton Heath. o Warrington residents have to pay the tolls to cross the new Mersey bridge crossing. There is concern that the Link new roads through South Warrington will attract traffic that would otherwise have used the Mersey crossings if there was no toll to pay. • In the 2011 Census, 81% of Warrington households had access to at least one car / van with 39% having access to two or more cars / vans. Nationally, just over a quarter (26%) of households had no access to a car / van which was considerably higher than in Warrington (19%) indicating higher levels of car ownership in Warrington. If a further 24,000 households are created in Warrington without substantial investment in sustainable transport options, the traffic situation will deteriorate further.
12) **Outlying areas of house building won't contribute to the town**
    a) Higher density in the town centre, lower density in outer areas should be explored • WBC have used a housing density of 30 dwellings per hectare throughout the PDO. • Achieving a higher housing density in the town centre (such as apartments) of up to 40 dwellings per hectare could mean that a lower density could be achieved elsewhere in the PDO. This would have the advantage of requiring less greenbelt land or enabling a different type of housing mix to be built (such as bungalows for elderly residents). Proposing a higher density in the town centre would match the desire of many new potential home buyers for housing without gardens, close to the town centre for social life and close to public transport hubs to avoid needing cars.
13) **Environmental impact**
    a) Apart from the poor communication and engagement with residents, the Council officers have failed to carry out the necessary ecological, transport and air quality surveys that would have informed a robust and sustainable plan. In making your response, you may wish to highlight some of the challenges below.
    b) A high level environmental impact survey has not been included in the PDO. A wide variety of animals and birds live in the greenbelt areas including badgers, water voles, great crested

newts and bats. In May 2016, the World Health Organisation reported that Warrington is the second worst town / city in the North West for breaching safe levels of air pollution (second behind Salford). According to the WHO, ambient air pollution is the greatest environmental risk to health and causes more than 3 million premature deaths worldwide each year. Although Warrington Borough Council claims to take air pollution seriously, recent council decisions suggest this is not the case (e.g. the new multi-storey car park in the town centre and the increasing bus fares / reduced bus services). Unless the Warrington transport infrastructure can be improved significantly through appropriate investment in sustainable transport, the level of air pollution will increase – this will affect all Warrington residents, not just those living closest to the new housing developments.

14) Misc.

a) With its investment in Redwood Bank there is a suspicion that WBC are going to subsidise developers and are not independent to the process.

b) Equality • South Warrington is disproportionately affected by the PDO. North and Eastern Warrington are barely touched by the proposals

c) Healthcare • Warrington and Halton hospitals are already operating at or near to capacity. Almost all of the GP / medical centre in Warrington are operating at or near to capacity. • Whilst the PDO makes mention of providing new health facilities in the Garden City Suburb and the South West Extension, there is notably no mention of increasing capacity at Warrington Hospital. The residents occupying the additional 24,000 dwellings will also need access to healthcare facilities.

Summary

15) The residents of the borough deserve a higher standard of disclosure and transparency than has been shown to date if WBC is to regain the support of the electorate. The council need to demonstrate how they have addressed the massive resistance to this plan across the town. It seems a fait accompli and the residents of the town will fight this bitterly.

Yours faithfully

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