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Dear Sir/Madam,

I am writing in response to the Preferred Development Option consultation.

Having carefully reviewed all the information provided by Warrington Borough Council, I hereby register my *objection* to this scheme and call for a *complete re-evaluation* to be carried out.

Certainly none of the residents of South Warrington want the PDO and in concert with them, I object to the scheme on the following grounds, the detailed background for which follows:

- a) It will destroy huge swathes of green space.
- b) Cause long term planning blight; the probable inability to sell ones property and strong potential for negative equity.
- c) Vastly increased traffic volumes, leading to increased local congestion.
- d) Increased pollution from the traffic and the new road schemes.
- e) No integrated transport scheme; the PDO does not meet its own aims (to "reduce congestion and promote sustainable transport options, whilst reducing the need to travel") set out in W4 of the consultation document.
- f) Decreased wellbeing due to stress, noise pollution and environmental damage.
- g) Decreased health due to increased pollution levels.
- h) Decrease in wellbeing, which would be caused by nearby construction, with the associated noise, dust, dirt and heavy traffic.
- i) Destruction of Moore Nature Reserve, which contains a large number of rare and endangered species, as well as ancient woodland. Converting Arpley Landfill into a country park does not and never could constitute a mitigation strategy, due to its inability to replicate or even partially replace what is a

complex habitat and species mix, which is completely unique in the entire UK.

- j) The plan is predicated on rather large assumptions in terms of economic growth. The estimates are shaky at best, particularly in view of our impending exit from the EU; the basis for negotiations and exit settlements have not even been finalised.

According to it's own aims and objectives, WBC should be increasing the health and wellbeing of its residents, reducing pollution, reducing car journeys made, listening to its residents and indeed (Council Strategy 2015) "putting residents at the heart of everything we do". The PDO breaks all of these objectives.

To you, the Executive Officers of the council; put your people at the centre of what you do rather than your egos, listen to your constituents and scrap this ludicrous plan.

Yours faithfully,



## Background Detail to PDO Response

### 1). **Insufficient window of objection:**

Whilst WBC may protest its innocence, it is abundantly clear that this consultation process was utterly, completely and **deliberately** poorly publicised. The council chose to use the poorest media streams possible. The following outlets were used by WBC as it's primary method of message delivery:

Wire FM (audience figure <28,000) - a 6.30am slot further reducing listenership.

Warrington Guardian – circulation of only 15,300.

Warrington Worldwide.

*Westmorland Gazette* – utterly irrelevant.

It is easy to see from the selection above that getting the message out to the populace of Warrington (nearly 210,000) cannot truly have been a priority. Bearing in mind that there will inevitably be some audience overlap, the overall reach would be around **19%** of the population. Also, as far as I am aware Warrington isn't in Westmorland!

The consultation period itself fell entirely within the summer holiday period, again decreasing the likelihood of receiving a large number of responses and therefore objections. Whilst this period was grudgingly extended by two weeks, this was merely a sop. The consultation process is for these reasons virtually invalid.

### 2). **Greenbelt assessment and release:**

There was an initial Greenbelt analysis by Ove Arup completed in 2016. In relation to this work was flawed in a number of areas. Whilst it quite rightly acknowledged the Walton Village Conservation area, it still ignored the historic setting of Moore village conservation area, upon which any development would have a far greater impact. There are also a number of significant, historic buildings in Walton, which would be adversely affected by the proposals – including the Old School, Porch House Farm and Cockfight Cottages, which face onto Runcorn Road (listed as historic assets in WBC Core Strategy, February, 2014)

The subsequent re-evaluation of green belt in 2017 by WBC simply served to weaken the GB status of proposed development areas; there has been no change within those areas during the 12-month period between the two assessments. There can be no justification for the downgrading in categories 1 and 4 in their assessments of R18/125

Perhaps WBC could provide some factual analysis to support the changes from *Moderate* in both cases to *Weak* in category 1 and *No Contribution* in category 4? Other than a vested interest in such a weakening of the status, due to the drive to allow Peel Holdings a free hand in developing the land, there is no logical reason whatever for this.

Similarly, the re-analysis of R18/133 is equally if not even more flawed. The classification of a locale as "open countryside" is not a function of how restricted or unrestricted the views might be due to "dense vegetation", as seen in the work by Arup. WBC re-parceled the area, which in the 2016 the review had been more sensibly divided the area into three plots; WR70-72.

Irrespective of adjacent warehousing, the Moore Nature Reserve is a 200acre area of countryside with a level of flora and fauna diversity and rarity, which is of SSSI ranking. This has an extremely strong role in preserving the countryside and preventing encroachment. It is crystal clear that the 2017 analysis, the re-parceling of the plot was done simply in order to weaken the contribution to section 3 and thus allow a downgrading of the greenbelt from Strong to Moderate. Once again, nothing has changed during the intervening year and there can be no justification for such a downgrading; this is once again WBC giving the Peel Group help rather than doing their duty and protecting the environment and the residents of the borough.

In call for sites submission R18/133, when describing the land adjacent to the existing warehousing, Peel refer to it as some vacant and greenfield land. In the same section of the form it mentions a "nature park to the North"; it is not completely clear as to whether this refers to Birch Wood and the adjacent lake, or Moore Nature Reserve itself. This is disingenuous at the very least.

What is glaringly obvious is that Moore Nature Reserve is not mentioned by name or exact location and is not even marked on the submission map, unlike Moss Wood. The destruction of the Moore Nature Reserve runs completely counter to statements made within section 8 of the Peel Ports Masterplan, in which its stated aim is to maintain or enhance biodiversity on land within its ownership.

It should be noted that planning permission for Port Warrington Phase 2 (granted in 2010) was for a 24acre linear extension to site, running parallel to the ship canal. The submission for the now 200acre site extension falls under the Warrington Waterfront area and now forms part of the PDO.

The vast majority of the greenbelt land under consideration is currently agricultural. In a Post-Brexit environment, the UK should be safeguarding its food growing capacity and indeed enhancing it, to maximise food security and reduce our debt due to imports.

### **3). Emergency access to South Warrington:**

Birchwood Lane, which links Eastford Road with Moore Lane, provides the only emergency fast access to Walton and Moore should the Stag and Stockton Heath swing bridges were out of action for any reason. During the construction of the Western Link, Birchwood Lane would become inaccessible for a considerable time.

#### **4). Proposed Housing Density:**

It is clear from the proposed housing density targets for the Garden City, and Southwest Extension plans, that the aim is to produce areas which generate higher council revenues; clearly more widely spaced, larger houses fall into the high council tax bands, thus providing more income in the longer term. There is a very strong likelihood that the higher earners who would own such homes would work outside of Warrington. This means more commuting, more road use and greater pollution, which runs completely counter to the WBC stated aim of "sustainable transport" solutions.

Additionally, since this housing is not primarily low cost/affordable and will inevitably cause population influx, the proposed use of greenbelt for housing stock cannot be viewed as an "exceptional circumstance". It is only so if the council wishes to generate exceptionally high council tax revenues.

WBC has not maximised the potential increase to housing stock within the minimum area, due to the chosen (30d/ha) housing density. Adopting a 40d/ha density in the brown field areas would allow the council to reduce its requirement for greenbelt release by between 56% (at 30d/ha) and 67% (at 40d/ha).

Part of the purpose of greenbelt land is to prevent "urban sprawl" and to stop towns and villages merging into one another. By the very nature of the proposals for South Warrington, this part of the NPF is being breached: Appleton Thorn, Grappenhall and Stretton will all effectively be swallowed up into the "greater Warrington". Once again, there is no exceptional circumstance, since there is no requirement in the NPF to create a New City. This bid for city status, whilst being denied by Mr. Farrall, is in fact the avowed aim of WBC, as repeatedly stated within the PDO consultation document of July 2017. Any such denial is clearly a blatant lie in view of the SEP developed by the Cheshire and Warrington LEP. It is even referenced (section 2.20) on page 7 of the consultation document!

#### **5). Infrastructure Weakness:**

There is no mention anywhere in the plan for any increase in police, fire brigade or ambulance/paramedic numbers. As more people are attracted to living in the area from outside, how will our emergency services be expected to cope? Warrington Hospital cannot deal with the current numbers, let alone those from the 24,000 new homes.

Whilst there are a number of new road schemes planned, they all end up feeding what will be increased traffic into the existing overburdened road system, but in the North of the town instead. Thus simply moves the problem.

Specifically, it is acknowledged by the planners that the Western Link will draw in at least 5% extra traffic volume due Mersey toll avoidance alone. However, no account has been taken of the extra flow of HGV traffic destined for Port Warrington via the Western Link if PW Phase 2 is goes ahead. At present, there is no forecast available, however, even then most conservative estimate for 200 acre, 24hr warehousing and logistics complex would produce a volume of several hundred lorries per day.

## **6). Pollution and Health Effects:**

Aside from just the noise issues for the residents of Moss Lane in Moore, for anyone living along the route of the new road, together with the rise in traffic volume, there will produce a concomitant increase in particulate emissions, most especially due to HGV traffic. This will be a potent mixture of diesel, brake, tyre and tarmac particulates. As is known, the primary health concerns come from the PM<sub>10</sub> and PM<sub>2.5</sub> particles. It has been demonstrated (WHO report on health risks associated with particulate matter) that there is a 6% increase in all-cause mortality for only a 10µg/m<sup>3</sup> increase in PM<sub>2.5</sub> particles. The ultra-fine particles have been shown to cross the blood-brain barrier and are now regarded as a causal factor in Alzheimer's disease.

Although factoring in the coarser fractions further increases the morbidity figure, their greatest role is in causing and exacerbating bronchitis, asthma and other chronic pulmonary conditions. It is crystal clear from research cited in this comprehensive report that particles from PM<sub>10</sub> downwards can travel significant distances. Thus the Western Link would pose a clear and present danger to the health of not only those living in close proximity, but also the populations of Stockton Heath, Walton and Moore.

It is of note that those most vulnerable to the effects of fine particulate pollution are infants and (in the case of PM<sub>2.5</sub>) even foetus', since they can cross the placental barrier.

## **7). Over-optimistic Economic Forecasts.**

Considering the OECD growth figure for the UK for the next twenty years stands only 2%, Warrington would exceed the national GDP figure by a considerable margin to warrant the proposed increase in housing stock. Whilst WBC and the LEP use an increase in GVA as a justification, it should be borne in mind that GVA tends to overestimate true growth figures since it includes financial intermediation services indirectly measured (FISIM). The FISIM figures are not directly comparable across different sectors and their inclusion tends to skew or distort figures for productivity and labour costs. This area of the PDO needs a serious re-think.

## **In Conclusion:**

The main driver of this planned expansion of Warrington is the SEP produced by the LEP, of which WBC is a core member. Warrington New City forms a key part of the SEP. We acknowledge that the push for housing for all and increased local employment are both laudable aims. However, it is evident from the structure of both the SEP and the WBC PDO that primary motivation is to increase council revenues. In terms of the PDO, this would be achieved to a large extent through council tax revenue: since the affordable housing target is only 20%, the PDO would generate over £35m in council tax. Even more would be generated through the business rates on any new employment developments.