



**Re: Consultation on Preferred Development Option**

Dear Sir/Madam

We are writing to lodge our concerns regarding the Preferred Development Option for Warrington published on the council's website. These are as follows:

**1. Inadequate consultation with stakeholders**

Although the council appears to have consulted with landowners and developers, it has not made any attempt to contact local residents that might be affected. Given the scale and potential impact of such a large development, particularly across South Warrington, it is reasonable to expect the council to have involved local councillors (who, we understand, have been excluded from involvement) and inform residents directly of its plan, for example, by a leaflet accompanying the council tax bill. Instead, the council appears to have launched a stealthy consultation during the summer months, providing very limited linked supporting information on its website (and those links provided do not work), and imposed a limited timescale for responses. Residents have only learnt of the council's plans by word of mouth, social media and active local councillors. As such, there are likely to be many affected residents who are unaware of the proposals or unable to respond within the timeframe. Hence, we request that:

- a. **The council contact all affected residents directly to make them aware of its plans**
- b. **Upload all supporting information to its website, with functional links from the consultation web page**
- c. **Extend the consultation period for at least 6 months from when all residents have been contacted and all information is made available (whichever is later) to allow adequate consultation**

**2. Ill-conceived prime objective**

The stated prime objective of the plan is to 'aspire' to become a new city. From this one objective, much hinges, including the overall justification for substantial increases in housing to the use of green belt land. We categorically do not support this objective. This

will by its nature change fundamentally the character of the town for the worse, leading to a step-increase in congestion and pollution, removal of green spaces, and the swallowing of outlying village communities. This is an objective that is fuelled by ambition and greed under the veiled umbrella of economic growth, which is misplaced and outmoded in 2017, where the key to success is sustainability and regeneration. As such, we request that the council:

- a. **Withdraw this objective from their plan, and remove all plans that rely on it for justification**

3. **Flawed housing needs analysis**

The plan refers to the Mid Mersey Strategic Housing Market Assessment as its evidence for future housing needs. However, the projections calculated in this assessment are fundamentally based on an extrapolation of past housing growth, which is of no direct relevance. In a demand-led housing market, future housing growth is simply a function of future development. In other words, in a buoyant housing market, using past housing growth as a justification for building new houses is a self-fulfilling prophecy and cannot be considered as evidence for a housing need. Evidence that appears to be lacking includes specifically researched and applicable data relating to factors that directly influence Warrington housing needs, such as:

- a. Homelessness
- b. Overcrowding
- c. Adult children still living at home
- d. Vacant housing
- e. Major businesses looking to move to or leave the area
- f. Expansion or contraction plans of major employers in the area

By extension, there is no evidence-based demographic demand for housing presented by type and cost. In summary, as it stands, **there is no robust derivation presented of Warrington's housing needs.**

4. **Inadequate grounds for using green belt land**

The National Planning Policy Framework states that green belt boundaries should only be altered in exceptional circumstances. This is clearly not the case since it is based on:

- a. The 'aspiration' to become a new city (see point 2 above)
- b. A flawed housing needs assessment (see point 3 above)

The Feb 2017 White Paper entitled *Facing Our Housing Market* reinforces the need for 'maintaining existing strong protections for the Green Belt', and clarifies that 'Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements'. This has not been accomplished. There is, for

example, no comprehensive identification of existing and future brownfield sites, nor any supporting demonstration that brown field sites will be used in preference to green field land, including land that will be released within the period of the plan such as at Fiddlers Ferry and Warrington Hospital (to name but two that we are aware of). The council has a duty to regenerate this land or return it to green field before developing on green belt land.

Moreover, there is:

- c. No supporting study on the impact on the environment and ecology that such a development would have, noting that the land in question is a haven for wildlife (including bats, owls and breeding birds), with established woodland areas, ponds and hedgerows.
- d. No consideration of the impact on affected agriculture.
- e. No consideration of the lack of access to the countryside, currently enjoyed by the local communities.

**In summary, the plan does not demonstrate exceptional circumstances for developing on green belt land nor does it consider its impact.**

#### 5. Inadequate traffic planning evidence presented

As all residents and commuters to Warrington know, congestion in the town and on the routes into and out of town is already a problem during peak times, and is often aggravated by movement of swing bridges along the Manchester Ship Canal or accidents on the M56, M6 or M62 motorways. The plan proposes road developments ahead of new housing. It is less clear on proposed motorway junction improvements (which do not appear on the Highways England website). It tacitly assumes the feasibility of road developments that will not make congestion any worse. However, none of this appears to be supported by a comprehensive and robust traffic analysis underpinned by representative traffic surveys. **Until this is completed, the plan should not be assumed to be viable.**

Specific questions unanswered include:

- a. To what extent will re-engineering motorway junctions relieve congestion, given the increase in traffic?
- b. Are motorway junction improvements even feasible, given the potential disruption to traffic?
- c. Who will pay for motorway junction improvements?
- d. How will the new junction proposed between Stretton and the M56 affect traffic on the A49, which is already congested?
- e. How will the proposed Eastern Link be affected when motorway accidents occur and commuters use it to cross from the M56 to the M6 and vice versa.
- f. What improvements are planned/necessary to existing roads, given the increase in traffic?

- g. How will increased congestion in the town centre be eased?
- h. How will the new Mersey Gateway Bridge affect traffic through Warrington, given that many will try to avoid the toll?
- i. What is the predicted increase in air pollution? Is this acceptable, noting the WHO Global Urban Ambient Air Pollution Database (update 2016) identifies Warrington as already having excessive air pollution (40% higher than recommended PM<sub>2.5</sub> levels)?

**6. Insufficient consideration of the local healthcare economy**

Another 55,000 or so individuals will add greatly to the demand on local healthcare services, including GPs, dental and hospital services, which are already stretched beyond capacity (as any patient knows first hand). There is no assessment presented of the current demand, the projected demand and the options available for bridging the supply gap across the healthcare sector. A new healthcare hub is proposed, but this will relocate existing services away from the local community in Appleton, many of who are infirm and rely on its proximity.

We would be grateful if you would acknowledge receipt of this letter and respond to our concerns in writing.

Yours faithfully

