

## Overarching comments on the Development Plan

- Authority of council – do they have the powers granted to undertake a development of this scale ie is there a limit to their authority which may be exceeded.
- Competence & experience – does the council have (and be able to demonstrate) the necessary skills and experience to assess, procure and undertake this scale of development. Without these, the wrong or insufficient questions are asked, the wrong reports and assessments are procured, resulting in the wrong answer. On the basis of the reports and development plans produced to date, I suggest this is exactly what is happening.
- Requirement for new housing is not clearly established – the report is based on assuming a set number of additional houses will be built, so where can we put them. Rather than looking at what volume of development areas can actually accommodate and what is actually needed. See point above – ask the right question.
- What is driving this desire for City status – what benefits if any does it bring? And to who?
- What does City status generate for the council?
- There is a complete lack of transparency in the requirements & reasoning behind them – a number of councillors were unaware of the development plans until issued for consultation. What is the big secret and why the rush?
- Public Inquiry – I have been involved in schemes far smaller and less intrusive than this which have required Public Inquiries. I would therefore expect this to be the case here.
- There is no programme for the development and implementation / construction of the plan that I have seen. Physical construction on this scale will itself have an immensely disruptive effect on the local communities. Where is this considered?
- Integration with other NW plans / Liverpool / Manchester. There is no evidence in the Plan as to how this has been assessed as part of the bigger NW picture. Without this, how do you justify the numbers in the first place.
- Where are envisaged employment areas for these new residents? Will this rely on additional businesses etc being built as well? Where is this covered in the Plan?
- Rail & Road links are at capacity – If additional commuting to work places in Manchester / Liverpool etc, the east/west and North / South motorway links are already operating beyond design capacity and there are already capacity issues on the trains at peak times. How has this been considered?
- HS2? Has the impact of this been considered, and if so where?
- Infrastructure to get in to town centre facilities. Currently, traffic on the main routes in/out of town results in unacceptable delays during weekend shopping periods (irrespective of gridlock during weekday commuting periods). (It took me an hour to cross through town last Saturday morning). There is very limited scope to amend these existing routes to cater for shoppers etc (as opposed to bypassing the centre for commuters). There is no evidence this has been considered in the Plan.
- Funding for necessary infrastructure in advance. Assuming that the council intends to get all the relevant infrastructure, improved roads etc etc in place in advance of building new housing, where does the funding for this come from? And please confirm that is the intention, rather than build houses first and then think about the improvements necessary to support them.
- Demographics – social care for older population. There is mention of new schools and medical facilities but nothing regarding sheltered accommodation etc. Some areas have well over 20% of the residents aged 65+, how will these be catered for?
- Affordable housing – most development areas appear to be in comparatively affluent areas – how will this fit with first time buyers / unskilled workers.
- Green belt – strong / moderate / weak classifications. Green belt is green belt, this would appear to try and justify using some of it if it can be “downgraded” by a subjective scoring

system. There appears little of no focus on the issue of using brownfield sites first with green belt as a last resort.

- Efficiency of existing housing stock and design life. Many properties built during the early phase of Warrington New Town will be 60+ years old by the time this Plan is completed – have the effective design life and green credentials of these properties been considered ie will these need to be redeveloped?
- Provision of power, water, sewerage & drainage – increased hardstanding generates more flash water runoff. Have these issues been considered to ensure flood risk is not raised.

#### Significant loss of Green Belt Land

- The PDO includes the release of greenbelt land to support 9,000 new homes over the next 20 years.
- 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.
- This issue affects the whole of Warrington.

#### Using 'Brown Field' sites first

- There are large Brown Field sites likely to be released within the 20 year period of the plan which have not been taken into account. Fiddlers Ferry is nearing its end and Warrington Hospital is planning to move to a new site. These areas could make a significant contribution to the town's housing needs so that Green Belt land could be spared unless essential.

#### A desire for “City” status is driving the growth

- The PDO is based on an assumption of 1,113 new homes per annum over the next 20 years, equating to around 24,000 new dwellings. Although the reasoning for this assumption is discussed in the PDO, the conclusion needs to be challenged in light of the current economic environment. Adopting a lower assumption of new homes per annum could have a significantly reduce the amount of Green Belt Land which would be needed.
- In various parts of the PDO, reference is made to Warrington ‘New City’. The aspirations of WBC to become a city are not necessarily shared by residents. Such aspirations appear to be driving a higher housing assumption and employment assumptions than may otherwise be necessary or realistic.

#### Sheer scale of the proposed Garden City Suburb

- The proposal of a Garden City Suburb in South Warrington has horrified many of the residents who currently live in this area. The smaller villages such as Appleton Thorn, Grappenhall and Stretton, which are currently separated from one another by fields, will be completely surrounded by the new residential developments. This will completely change the character of the area and remove one of the reasons why many people chose to live in this area in the first place (being on the edge of a town and also on the edge of the countryside).
- The ability to access and enjoy green space is an amenity in itself and the loss of such a significant amount of green space will be detrimental to current residents.

#### 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 should not be underestimated.
- 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.

#### 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. The extra traffic from so many houses will make gridlock more likely.
- The PDO includes an 'Eastern Link Road' from M56 Junction 10 to the north of the Manchester Ship Canal (pg 41). This route 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, at the moment, 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. As such, this will result in the deterioration of the quality of life for current residents who will be subjected to increased noise, pollution and vibration from the increased traffic flow.
- 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 (pg X). Again, this route would be detrimental to the people currently living in this area.

#### Environment

- A high level environmental impact survey has not been included in the PDO.
- Protecting wildlife matters. A wide variety of animals and birds live in the greenbelt areas including badgers, water voles, great crested newts and bats.

#### Higher density in the town centre, lower density in outer areas

- 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).

#### 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.