

OBJECTIONS TO PREFERRED DEVELOPMENT OPTION SPECIFICALLY THE GARDEN CITY SUBURB

BY [REDACTED]

No.	TOPIC	OBJECTION RESPONSE
1	Vehicle increase and pollution	<p>The increase in the number of private cars servicing approximately 7000 new homes in the Garden City Suburb (GCS) will probably result in up to 14000 new cars on our local roads, albeit not on the roads at the same time but peak commuter periods will be problematic. This is based on two cars per household which is a conservative figure. Warrington already has the second highest poor air pollution figure in the North West and the GCS proposal will significantly increase pollution levels for local residents. Furthermore, the potential that a major distributor road running through the centre of the proposed GCS will no doubt attract heavy goods and commercial vehicles likely to be taking a short cut between M56 J10 and the Barley Castle Trading Estate. This will also greatly increase pollution levels from diesel powered vehicles. Note that one of the existing policies in the current Local Core Strategy Plan 2015, MPI, is to reduce private cars usage. These observations and facts do not justify the 'Exceptional Circumstance' required to build on green belt land.</p>
2	Population growth	<p>It is recognised publically that Warrington population growth is below the national average. As such the PDO calculation method used for the number of new houses required to be built per annum would appear flawed and not sustainable. Proposed increase in houses is clearly stated in the PDO as being based on assumptions, projections and aspirations of economic and population growth. These metrics would appear to be based on consultant information from national statistics and not based on specific Warrington based assessments. The overestimate of housing is not credible and needs to be revisited with the aim of not having to take up green belt to satisfy a revised housing forecast. These observations and facts do not justify the 'Exceptional circumstance' required to build on green belt land.</p>

3	Brownfield sites	<p>There is no confirmation in the PDO that <u>ALL</u> brownfield sites throughout the Warrington area have been identified and incorporated into the housing plan prior to deciding to use green belt land. There appears to be no specific register available for public scrutiny to confirm that WBC have indeed used all available brown filed sites which are currently available and which are likely to become available during the next 20 years. The NPPF and government white papers state that priority be given to use of brown field sites before considering uncroachment into the green belt. The PDO therefore does not demonstrate this requirement and therefore is not credible in its approach to claiming 'exceptional circumstance' for the use of green belt land. Furthermore, there are areas of north Warrington which have been ignored in favour of wholly creating a Garden City Suburb in South Warrington. This is not a balanced solution and unjustly targets green belt land in an area of local outstanding beauty.</p>
4	Option 5	<p>The PDO is clear that of 5 further sub options from the Stage 4 location option evaluation, Option 2 has been chosen resulting in the location of the Garden City suburb. The fact that Option 5, which does not require the wholesale uptake of green belt land, has been dismissed cannot be grounds to claim exceptional circumstance. This decision making cannot be viewed as justification and is considered to be contrary to NPPF and White paper guidelines.</p>
5	Fiddlers Ferry	<p>PDO clause 4.61 states that other potentially developable urban sites in the north and east of Warrington are included in the call for sites exercise but have not been considered for inclusion in the preferred option. If other urban land is available for housing development, but has not been included in the land bank calculation, how can exceptional justification be claimed for the use green belt land in South Warrington. It is understood from documents issued by SSE, the operators of Fiddlers Ferry power station , that it is highly likely that the station will only continue to operate up to 2020, 2 years hence due to increasing and unsustainable financial losses. Furthermore the Government is committed to phasing out coal fired power stations by 2025. It seems clear that the uncertainty expressed within the preferred option clause 3.6 is flawed and that post 2025 this site, at the latest, will become available for development, the earliest date possibly being 2020. WBC should factor in their plans for the potential gain in land bank now, at this planning stage, such that the uptake of green belt land is negated.</p>

6	City Status	<p>Further to the missive and response by Andy Farrall regarding his clarity and view in his Warrington Growth document entitled 'Garden City / New Town / New City and all that Stuff' as to the use and understanding of the term of City. It is understood that the aspiration is no longer to become an official city. However, it has been very misleading to the general populous. The effect of defining that Warrington as moving from a town to a city, as defined in policy W1 is still erroneous. Why, therefore, is Warrington still continuing to pursue the misuse of the term of city status? It is stated in the PDO that objective W1 is that the prime need is to change Warrington from a town to a city. This is now a flawed concept. This misguided aspiration and vision of a city which attracts financial advantage appears to be firmly driving unrealistically high economic and population growth over the next 20 years. These unrealistic projections for disproportionate population growth therefore would appear to be driving this need for additional housing, which WBC maintain can only be provided by the uptake of green belt land. This aspiration does not warrant or justify the need for WBC to claim 'Exceptional Circumstance' in the use of green belt land.</p>
7	Green Belt Assessment and review	<p>It is considered that the recent Green Belt Review conducted by WBC consultants Ove Arup and partners, which has graded the whole of the Warrington area into 3 categories, to be subjective and biased to targeting South Warrington Area 10 as a weak area and therefore erroneous. Albeit that arbitrary rules for grading were established it is considered that 3rd party consultant decisions as to the relevancy of the degree as to what constitutes contribution to the restriction of urban sprawl as being strong, intermediate or weak green belt is highly subjective and to classify them in this manner is wrong and is contrary to the original concept of a green belt. Green belt is green belt, it would not appear to ever been sub classified and there appears to be no government ruling in the application of such a sub classification. To this point all areas should be treated equally. Therefore Area 10, which covers the proposed garden city suburb should not be regarded as having a weak contribution to the green belt. This classification has been applied to justify the use of Area 10 for development. Therefore this is a flawed concept and should not be used to target and destroy some of the most beautiful countryside and villages surrounding Warrington by the WBC aspiration for Warrington to become a city. Green belts are to prevent urban sprawl. The preferred option actually promotes urban sprawl by joining together the parishes of Hatton, Stretton, Appleton, Grappenhall and Lymm such that they will lose parish identity. This is entirely contrary to the ethos of green belts and should not be used as a basis for exceptional circumstance.</p>

8	Exceptional circumstance	<p>The PDO claims that WBC can justify invoking the clause of 'Exceptional Circumstance' as the reason to use green belt land for housing development. This is unjustifiable on many counts as defined below:</p> <ol style="list-style-type: none"> 1). calculation of target dwelling numbers are not robust and over estimated. 2) Not all brownfield sites have been allocated for housing before looking to use green belt land. 3) Over estimation of forecasted population and economic growth is driving high dwelling targets 4) Green belt review unfairly designates Area 10 as a weak contributor to urban sprawl 5) Loss of agricultural land is detrimental to local farming. 6) PDO promotes urban sprawl whereby NPPF and Government white papers promote green belt retention to prevent this happening. 7) Location Option 5 can achieve housing targets without taking green belt land
9	Distributor Road	<p>The PDO Garden City Suburb map shows the route of a new distributor road from the A49 just north of M56 J10 across to the Grappenhall Heys area. If the PDO is adopted then this proposed route is not a viable route as currently indicated. The indicated intersection with the A49 will cause traffic chaos even more than the Cat and Lion traffic lights do currently. The route should start at the M56 J10 by utilising an existing road which solely feeds the Stretton Fox Pub. This new distributor road should be a single carriageway, with some form of traffic calming. It should not allow HV's along this domestic housing development area access as the road will become a commercial short cut between J10 and Barley Castle Trading estate.</p>
10	Loss of Agricultural Land	<p>Many fields within the proposed green belt are used for grazing or crop production. The removal of agricultural land is detrimental to the local farming community and removes precious land resources for food production. Green belt agricultural land to be used for housing development is not environmentally sustainable. WBC cannot claim 'exceptional circumstance' to justify green belt use when other developable areas of Warrington have not been utilised before green belt uptake.</p>

11	Housing Target	<p>Clause 4.7 of the PDO is based on an assumption of 1,113 new homes per annum over the next 20 years, equating to around 22,260 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, Brexit and the revised Government housing calculation method. Furthermore, The revised figure of 914 homes per annum, as issued by WBC planning department, a difference of 199 dwellings per annum reduces the target by 3980 dwellings per annum. Adopting the lower calculation figure of new homes per annum will negate the need to use Green Belt Land.</p> <p>Furthermore, the PDO document is very technical and contradictory document and references certain key numbers as given “fact” without direct links to the source material or considering alternative calculations.</p> <p>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. However 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.</p> <p>Under these circumstances it cannot be viewed as justifiable by WBC to claim 'exceptional circumstance' to justify use of the green belt.</p>
12	housing density	<p>The PDO states that an average of 30 dwellings per hectare has been used as a basis for the calculation of the housing target. The use of an average figure is considered inappropriate when attempting to justify 'exceptional circumstance' to the use of green belt land. The uptake of green belt land is flawed when potentially higher dwelling densities can be employed in urban and brown field areas to reduce or negate green belt encroachment. The PDO should be based on specific plot areas chosen for development and apply the appropriate dwelling density for those plots. Greater use of higher dwelling densities should be used in urban areas such that the resultant overall dwelling density figures can be credible and sustainable.</p>

13	Urban Sprawl - villages	<p>The proposal of a Garden City Suburb in South Warrington using a large amount of green belt land is contrary to the ethos and guidelines of the NPPF and the Government housing white paper. The prime objective of these documents aim to protect the countryside from urban sprawl and to keep rural communities separate ensuring their individuality. The smaller villages of Stretton, Appleton Thorn, Grappenhall and Thelwall and Walton, which are currently separated from one another by green belt fields will be completely integrated within an urban sprawl which will remove the individuality of the village communities. This will completely change the character of the whole of South warrington and remove one of the reasons why many people chose to live in this area in the first place. The prompting of urban sprawl, contrary to government guidelines is not a justifiable reason for claiming 'exceptional circumstance' to use green belt land.</p>
14	Stockton Heath and A49	<p>The A49 from M56 J10 all the way through Stockton Heath and into warrington town centre is already at capacity and many parts of this route frequently suffer from vehicle grid lock. This also includes contributor side roads along its route. Stockton Heath, as the main district centre already suffers from grid lock and high exhaust emission pollution levels. Development of the GCS will be to the environmental detriment of Stockon Heath. This village centre currently has inadequate provision for car parking. The PDO does not include for any improvement for access or facilities within or around this district centre.</p>
15	Healthcare and provision for the elderly	<p>Healthcare in Warrington is currently at breaking point with the declared need to provide a new hospital, somewhere yet to be announced. The proposal of a Garden City Suburb in South Warrington will greatly add to the already over worked and insufficient capacity of the current facilities. Furthermore, the GP, dental care and general healthcare provision in South Warrington is woefully inadequate. Ambulance services are stretched and waiting times at hospitals are high. The PDO makes very little reference to providing improved facilities, other than a glib reference to some form of additional facility. Any new development on the scale of the GCS needs serious thought as to what and where new facilities need to be provided. There is no mention of the provision of intermediate Care facilities to release hospital bed space and no mention of retirement homes for our aging population. The residents of the South warrington additional housing will need access to healthcare facilities. The PDO clearly does not address these problems.</p>

16	Environment	<p>The effects on the environment are notably missing from any proposed development in the PDO. Environmental Impact Assessments, albeit generally only conducted further into development can be very obstructive. The Wildlife and Countryside Act 1981 is the primary legislation which protects animals, plants and habitats in the UK and a wide variety of animals and birds live in the greenbelt areas including many endangered species.</p> <p>Game birds are covered by the Game Acts, which fully protect them during the close season.</p> <p>Woodland, meadows, verges, ponds, streams, hedgerows and trees provide vital resources for mammals, fish, birds, and insect species. The development of green belt land destroys entire habitats for our native wildlife and puts some species at further risk of extinction.</p>
17	Inadequacy of Consultation Process	<p>The manner and timing with which this Reg 18 Consultation has been undertaken has been specifically poor and inadequate for a such a major proposal affecting all the residents of south warrington. The radical reversal of the commitment to the protection of the green belt in the current Local Core Strategy Plan to that which now openly advocated in the PDO calling for the destruction of green belt to provide sufficient dwellings for an over estimated population and housing need is beyond belief. As clearly admitted in the original Regulation 18 notification that the public and parishes have not been given enough time to evaluate the proposals, especially when the consultation has been over the height of the summer holiday period.</p> <p>There has been a tsunami of opposition, exhibited at the various public events. Many comments have been regarding the poor communication by WBC with the general public. The public have not been consulted upon the choice of the original options defined within the PDO.</p> <p>It would appear that since the High Court judgement requiring the original housing target to be revised upwards that the easy way out for a solution has been to artificially classify the green belt assessment for Area 10 as weak so that a single solution can be achieved. This is highly suspicious in its motive.</p> <p>The PDO should be reviewed again using more specific and accurate data than the averages and national statistics used to support a poorly produced PDO.</p> <p>The plan's 'evidence base' justification is by commercial/business consultancies and by using globalist oriented Oxford Economics and credit rating Experian thus indicating that the plan is a business venture without a substantiated social and environmental basis.</p>

18	Disclosure of Interests	This type of proposal and major revision of the Local Core Strategy Plan, which has been the result of the high court judgement brought to bear by a property developer, raises the questions of integrity and conflicts of interest. WBC needs to demonstrate the transparency and accountability in the production of this proposal. It would be of benefit if WBC disclosed the identity of property speculators, land and property owners, corporate bodies and other vested interests who would, and are most likely to benefit financially from the proposals of the PDO. This should include councillors, corporate and non-corporate functionaries and decision makers. Councillors and officers should disclose any positions and relationships, both informal and formal, which they have with any person or organisations likely to benefit in any way from the proposals in the PLDP.
19	Traffic and Transportation:	It would appear that there has been no detailed transport or traffic surveys conducted for inclusion in the PDO nor any evidence of any computer modelling and analysis of the environmental or social impact that the Garden City Suburb will impose. This is wholly inadequate when proposing such a major development. Traffic modelling for South Warrington should be undertaken as its basis to ensure the correct solution for development of any major infrastructure distributor roads. This result should be analysed and assessed by independent consultant.
20	Duty to Cooperate	It is clear from the PDO that WBC has, for some lengthy time, undertaken consultation with other neighbouring authorities regarding the development of the PDO. It is also clearly evident however in the timing and manner of the issuance of the Reg 18 consultancy period with the proposed option to the general public that no consultation with the general public has been undertaken in any shape or form prior to this. For such a major proposal affecting thousands of people of South Warrington this is considered to be a gross dereliction of duty to cooperate with the community. There has been no open or transparent communication with the general populous or indeed local parish councils other than during the restricted consultation period which the proposal had been open for review. Under these circumstances the PDO proposal is an unbalanced solution that has not been fully thought out regarding the reaction and major objections being raised by the wider community. The failure of the duty to cooperate should require the preferred option to be suspended pending further detailed assessment of the metrics and housing needs to which WBC has subscribed. This failure cannot contribute to the claim that WBC can justify 'exceptional circumstance' to use green belt land.