

Warrington Borough Council
Planning Policy and Programmes
New Town House
Buttermarket Street
Warrington
Cheshire
WA1 2NH



Online:
www.warrington.gov.uk/localplanreview

28th September 2017

Dear Sir,

Warrington Borough Council Local Plan. Preferred Development Option Regulation 18 Consultation

I wish to object to the Preferred Development Option (PDO) and have set out my response in two broad categories (as underlined): Immediate personal impact of the development; Issues relating to the quality of the consultation and reports.

Please may you distribute this letter to all Warrington Borough Council (henceforth WBC) Development Control Committee members?

Please may you provide a formal response to all comments and questions raised?

Immediate personal impact of the development

My home backs on to the Trans Pennine Trail. My family and I moved in November [REDACTED] and the primary reason for purchasing the property was the quiet, idyllic location and associated outlook.

The **stress** this PDO has caused my wife and I is matched only by that experienced by our neighbours and the mass of others affected in our community. My long working days have been proceeded by nights on the computer reading countless PDO related reports; leading to exhaustion, anxiety and eye strain. This all pails into insignificance compared to the impact of the plans if they were allowed to proceed.

Given my address on [REDACTED] I have the following concerns relating to the proposed strategic transport route on the line of the Trans Pennine Trail:

Noise – A primary motivating factor for moving from my previous home was the noise. I previously lived on [REDACTED], Thelwall, a cul-de-sac, with a single elderly neighbour adjoined. The low level noise through the party wall and from road traffic was sufficient for my wife and I to decide to move house. We moved to the quietest house we could afford, in the area we love; and what a find it was, behind the Trans Pennine Trail. The only noise I hear is the cacophony of birdsong. However, WBC wishes to build a strategic road behind my home. This would be positively unbearable.

Vibration – The vibration from the proposed road would be irritating during the daytime. During the night, it would affect my sleep. Further, though I expect the structural damage resulting from vibration from the proposed road would be unlikely, superficial cracking and crazing would be possible. This affect would have two causes: the initial construction of the route; the subsequent use of the route. To my knowledge, there is no mechanism for compensating for aesthetic damage incurred after a road has come in to use; I would therefore bear increased maintenance costs.

Light – Where there are roads, there are vehicles and streetlights. The only lights I see at night are the stars in the sky and the occasional passing of a cyclist's lights against the trees across the Trans Pennine Trail, which has a magical quality (think E.T.). Both static and roving lights would be irritating in different ways. They would affect my quality of sleep and would impact whatever limited wildlife is retained after its initial decimation.

Loss of view – I currently look out over a wall of greenery. There is an excellent mix of species of tree on the Trans Pennine Trail, which changes in its beauty throughout the seasons. This brings an enormous sense of wellbeing. According to Dr Alan Kellas, a psychiatrist who advises the Royal College of Psychiatry, nature can have a profound effect on our mental health (see “Isabel Hardman on nature and depression”, BBC Radio 4, 19th September, 09:30). All I have to do to treat a dip in mood or relieve stress after a day at work, is look out of the window or sit in the garden. Regardless, of how sympathetic the design, this effect would be lost and what would be left other than a sorrowful reminder of what once was?

Loss of privacy – All of my living rooms and my master bedroom look out onto the Trans Pennine Trail. Therefore, whether the Trans Pennine Trail is a road or railway, my home would be overlooked. It would be greatly upsetting to have passers-by peering into my home and garden. The footpath level, embankment crown and shroud of trees currently gives me complete privacy.

Loss of biodiversity – I've seen a greater array of wildlife in my garden in my ■ years at this property than I've seen throughout my entire life previously. I've seen voles, more colourful small birds than I thought existed, and even a Sparrowhawk. Other birds of prey can be seen flying above from time to time. On the Trans Pennine Trail, I've seen badgers, newts and foxes. I've also heard the occasional woodpecker and owls can be heard almost nightly. Bats fly over every evening and clearly roost on the Trans Pennine Trail. The trees themselves are diverse and mature and a healthy balance of native woodland flora can be seen. What is more remarkable about the Trans Pennine Trail than most open countryside is the way in which it creates a wildlife corridor across the country, relatively unbroken. I suppose all this would be flattened.

Air pollution – This is a particularly concerning aspect of the PDO. I expand on this below; however, here I must note the specific impact this would have on my quality of life. My asthma developed when I began commuting through Warrington town centre on my bicycle (something I no longer do). I believe it to be pollution related. Living next to a strategic road could only worsen the effects. Further, living adjacent to a busy road has been shown to increase the risk of developing more serious illnesses, such as dementia (www.nhs.uk, “People who live near busy roads have higher dementia rates”, 5th January 2017) and cardiovascular disease. As a result, proximity to main roads reduces life expectancy. Does WBC have it in mind to compensate neighbours of the proposed route so that we may increase our private medical coverage, have a contingency to cover non-insurance based expenses, and have the financial means off-set the pollution related brevity of life with a greater intensity of experience?

Loss of house value – The proximity to a strategic road will reduce my house value. On the assumption that my home will not be subject to a Compulsory Purchase Order, how does WBC intend to compensate me for the blight imposed by the PDO?

Loss of saleability – Not only would the presence of a road reduce the curb appeal and value of my home, it would also have a limiting effect on the target market, which means my home would take longer to sell. My estate agents have let it be known that sales have already fallen through for properties adjacent to the Trans Pennine Trail, due to the PDO. The saleability of my home is already diminished and will remain suppressed until WBC declares the route withdrawn and the Trans Pennine Trail protected forever more. I call on WBC to make a declaration that the Trans Pennine Trail will be protected as a cycleway, bridleway and footpath only.

Use of Trans Pennine Trail – The TPT is the foremost community asset in Warrington. I regularly use the trail for walking and cycling. In fact, this is the only safe, off-road location in the area for cycling with children. I have taught my five year old son to cycle on the TPT and my three year old son joins me on the child seat on my bike. This is the only location I believe is sufficiently safe for them to cycle and without nearby access, they simply would not partake in cycling. Losing the TPT would be detrimental to the health and well-being of young and old, and would also be detrimental to efforts to improve active travel. The TPT is a great walking route and connects well to other good routes such as the Bridgewater Canal.

The Grappenhall and Thelwall Royal British Legion is a well-supported and well-attended social club. The Trans Pennine Trail provides safe foot access to the club, whereas the alternative access across Stockport Road is positively dangerous, with poor site lines and fast flowing traffic. It is unclear whether the G&TRBL Club would be subject to CPO, which would be a great shame, given that it is central to the community cohesion and spirit of the parish. It is particularly positive for elderly members of the community, some of whom would otherwise be isolated from society. Regardless of CPO, the children's play area and outdoor seating would be ruined by a strategic road on the TPT.

Respectful proposal

A proposal that would be respectful of *existing* residents' health, homes and well-being would be an extension to the Trans Pennine Trail, as a cycleway and footpath. Continuing the trail across the disused bridge into the heart of Warrington would provide the following benefits:

- Simpler to retain the aesthetic of the high level bridge via sensitive, lighter and cheaper modification. The historic bridge over the MSC would be ruined by road or the return of rail.
- Direct access into Warrington without having to suffer the health effects and safety risks of accessing along heavily trafficked vehicular routes.
- Increase in active travel and active commuting
- Decrease in use of road network and decrease in congestion
- Associated limitation and possible reversal (as part of an integrated strategy) on the upward trend for deteriorating air pollution
- Increased spend in Warrington town centre, by locals who are currently put off by the traffic and parking congestion and parking charges
- Cultural improvement. Access on cycles would encourage access for reasons other than drink culture. Possible access into Warrington for leisure
- Extension of the Trans Pennine Trail wildlife corridor into Warrington and beyond
- Continuity of off-road, green, active commuting and travel between Warrington, Lymm, Altrincham and beyond

- Increased use of the Trans Pennine Trail to the west of Bradshaw Lane. The current requirement to enter the road network at Bradshaw Lane and cross the busy swing bridge in Grappenhall is off-putting to cyclists and walkers. As a consequence, the route along the north side of the Manchester Ship Canal is little used by comparison and its condition is inferior as a result. Cycle and foot access over the high level bridge and a potential TPT connection in Latchford would greatly improve the use of the TPT, thus contributing to the health and well-being of the local population.

Personally, I used to commute to Lingley Mere in North Warrington on a road bike. I stopped this after a year or so, due to a combination of safety (numerous near misses and being knocked off; fortunately, without harm) and pollution (development of asthma, wheezing and coughing, nostrils full of black soot). After becoming a parent, I felt continuing this would be wholly irresponsible. I also avoid trips into Warrington due to traffic and parking, but would gladly take my sons by bicycle if a suitable route was available.

Issues relating to the quality of the consultation and reports

Development of new Local Plan

The reasoning for writing a new Local Plan is set out in Section 2.33 of the PDO. WBC has decreed a mandate to write a new plan rather than revising the existing one, due to a mere 78 responses; many of which were discounted or required limited change. The case for an entirely new Local Plan is not justified.

Local Plan scope and timespan

The Urban Capacity Statement Update 2017 Section 2.3 identifies an urban area supply outside the green belt of 9,721 to 2032. If these sites were brought forward, there would be sufficient capacity to sustain circa 10 years development. The NPPF Paragraph 008 identifies that Local Plans must identify a minimum of 5 years housing land. There is no apparent driver identified within the PDO to plan for 20 years' worth of development. Would WBC consider reducing the scope/timespan of the Local Plan to perhaps 10 years and pick up subsequent housing need in the subsequent Local Plan cycles?

Quantity of documents

The PDO Consultation consists of 47 documents, 2,218 pages and approximately 733,873 words. To put this into context, this is about twice as long as Leo Tolstoy's notoriously protracted "War and Peace" by page count, and a third longer by word count. Is it reasonable to expect the public to process and make sense of this volume of information?

To produce such documents, which have inter-dependencies, is an iterative process. I expect at least 3 years and a minimum of £1m must have been spent developing this proposal. Please reply with actual numbers for time and money spent producing the 47 documents and associated unpublished work? What is WBC's intent other than to confuse, misdirect and steamroll these plans through?

Communication

Like most residents, it was a fellow parishioner who drew the plans to my attention, via receipt of a flyer on 28th August. Is it reasonable to expect the public to read the full content of this "consultation" in a little under 5 weeks, when we have work and other commitments?

Why have I had no form of contact from the Council, such as a letter?

Why was the public consultation advertised in the Westmorland Gazette (Notice ID MF0227615, 20th July 2017)? When I have placed public notices for my employer, I have done so in 1, if not 2 local newspapers. Please explain how this is not a dereliction of your legal and moral duties.

The original public notice stated the option to extend the consultation period. Does this not demonstrate that WBC knew the period to be too short? Further, this would suggest that WBC's strategy was to achieve a stealthy consultation with minimal opposition and only extend the consultation period if publicly caught. Does WBC refute this was their intent?

Version 2 of the public notice advertised the consultation event at the Park Royal on the 4th August instead of 4th September 2017. Readers may have assumed the event to have passed (along with the other dates advertised, which had already passed), which may have had a limiting effect on attendance.

Why was the consultation launched during the school summer holidays, when many residents are away on holiday and the parish councils are in recess?

Please explain why the parish most affected by these proposals, Grappenhall, has not had a public meeting? Venue size was used as an excuse by one planner; however, there are venues of equivalent size to those used in Appleton and Lymm i.e. this excuse does not wash.

I queued for 35 minutes to get into the Park Royal consultation event. WBC staff were conspicuous in their absence. Why was this meeting so woefully understaffed?

Section 2 of the PDO states there was a consultation on the proposed scope of the Local Plan review between October and December 2016. Why were Grappenhall and Thelwall residents not made aware of this? 78 responses, versus several hundred at the consultation event on 4th September 2017 demonstrates how many people are interested and concerned, when they are made aware. The PDO report states that of the 78 responses "the majority were from developers and landowners". Whether intentional or otherwise, WBC has disproportionately solicited the views of developers and landowners (some of whom will stand to profit from land sales); therefore, the feedback received and acted upon is unbalanced and biased in their favour. The Local Plan should be withdrawn and the process re-commenced from a position of fairness and balance, better representing the citizens of the borough, rather than pandering to the profit making desires of developers. Does WBC consider this request unreasonable?

Newspaper coverage and ethics

The Warrington Guardian has been typically shameful in its coverage of this consultation. They were extremely late to the party and the standard of journalism has been appalling. Though WBC cannot be held responsible for this, WBC does seem to have made efforts to engage journalist, Aran Dhillon. Unless the Warrington Guardian has misquoted Andy Farrell, he is surely guilty of misleading the public? How can the man leading this PDO deny the strategy and content of the PDO e.g. denial of fundamental aspects of the plan such as the desire for City Status? Is this man a fit and proper person to hold this position? Will WBC ethics committee launch an investigation into his conduct?

Delivering on commitments

WBC committed in its document named "Local Plan Review: Regulation 18 Consultation Scope and Contents Document" (October 2016) to follow the process set out in Appendix 2. However, a Landscape Character Assessment, Ecological Assessment, Multimodal Transport Model and

Infrastructure Impact Assessment were to be carried out prior to the PDO. Why have these documents not been completed and made publicly available?

Population growth ethics

If the government is driving every council to achieve growth and every council assumes new workplaces to be the sole source of growth, logically, councils cannot simply poach workers from other council areas, without there being an equalling effect (win some, lose some).

The only solution nationally is to increase immigration and / or increase population via the birth rate. The former is politically unpalatable in the face of BREXIT and the growth of isolationism and xenophobia among the voting populous. The latter (population growth), is repugnant to any civilly minded individual, as it is the leading cause of global warming, pollution and the depletion of natural resources. Is WBC aware of Population Matters (populationmatters.org) and does the Council have any policies in this area? The unrestricted growth of the urban sprawl is also the unrestrained growth of population. I believe WBC has a duty of care to its citizens to promote sustainability and improve family planning via a promotion of smaller families or childlessness. If WBC adopted such a stance, it might reduce the need for such enormous developments as desired by the PDO.

City ambitions

“4.5 As confirmed in Section 2 above, the Council has taken the decision to plan for a level of growth in accordance with the LEP’s Strategic Economic Plan, over and above the baseline economic jobs forecasts for Warrington. This reflects the Council’s ambitions for growth as set out in the Warrington Means Business regeneration programme, Warrington’s past track record of economic success and the scale of private sector interest wanting to invest in Warrington.”

“4.6 The Council believes planning for this level of growth provides a unique opportunity for Warrington to make the transition from a New Town into a New City.”

The level of development has been overinflated in order to meet an aspiration set out in the WMB Masterplan, as well as historic growth, which is not a suitable basis for forecasting for the reasons set out above. City Status is core to all aspects of the WMB Masterplan, including growth forecasts and the apparent justification of large single site developments. The desire for WBC planners to turn this town into a City is totally unjustified. What mandate does the council have to target City Status? To my knowledge, this was not the basis of election campaigns by any political party. Polls taken by the Warrington Guardian and the Grappenhall and Thelwall’s PDO opposition group show substantial opposition to City Status.

This concept pervades every aspect of the report, including the ruling out of settlement extensions in Lymm and Culceth due to a lack of alignment to the City concept. Given that city concept is fundamental to the strategy, should it not be endorsed by the citizens, prior to developing a 47 document consultation?

Failings of the Economic case

Failings of PDO’s economic activity forecasts:

- As section 2.5 of the PDO, take-up of jobs by those already in the borough has not been considered. To not consider the take-up of jobs by the unemployed, school leavers and transfer of those already in employment must lead to an overestimation of population growth and housing need. Is this WBC’s intention?

- The data is pre-BREXIT. BREXIT is completely unprecedented and not comparable to previous peaks and troughs as set out in PDO section 2.14; therefore, the methodology is flawed.
- Data is pre- downgrade of UK growth forecasts by the IMF, as 24th July 2017.
- Credit ratings agency, Moody's downgraded the UK credit rating on 22nd September 2017. WBC was singled out for a two notch downgrade on the basis of its "higher risk appetite relative to peers" and a "quadrupling of debt to revenues over the next three years". I am astounded that WBC believes this form of financial management is acceptable following the recession of 2008/09 and subsequent years. High debt public expenditure is unpalatable to the voting public and I expect this debt loading is unknown to the majority, as it was to me.
- Use of Experian data has resulted in an increase from 839 homes per annum to 955 pa. The case for using Experian data is not well made. What outcome would be gained from using the Office for Budget Responsibility forecasts? This should be stated in the PDO.
- Section 2.9 is not made plain. I infer that WBC has higher job growth aspirations than is forecast by the economic models. I challenge WBC to create the jobs, and only then, if the case is proven, provide the housing. It is perverse logic to build such a vast number of houses based on an aspiration for jobs.
- How is the additional 20% allowance per annum for employment land, as set out in section 2.15 "to provide for choice and slippage" justified? Developers will logically continue to reject the same parcels of land, which offer least profit, therefore, highly prized greenbelt will suffer in relation to brownfield, if choice is afforded. In well run programmes within highly regulated markets (such that I work in), it is not common practice to overcommit resources to account for planned slippage. This is conducive to acceptance of poor planning and execution. Proper Governance should be the mechanism for managing success, rather than planning for failure. As above, historic data cannot be relied upon and given the audience of the initial consultation (Developers), it is unsurprising that this has not been challenged to date. Further, where land take-up has been by Developers and buildings have been erected, what consideration has been given to the vast number of offices and retail premises which lay dormant/unoccupied?
- It is fitting that Developers would like to match historic growth forecasts, as stated in section 2.16. Residents fear that WBC is succumbing to Developers' negotiation strategy i.e. Developers protest for high growth, WBC accepts higher growth than its constituents deem acceptable.
- The basis for economic growth appears to have been entirely placed at the door of new workplaces. Economic growth can be generated by supporting existing businesses, rather than solely new-build. Further, it is not clear what role working from home including new sole traders features in WBC's plans for economic growth. New warehouses and offices do not a thriving economy make.
- It is a primary belief of the 4000+ member opposition group representing Grappenhall and Thelwall that growth proposed by the Council is too high and this is resulting in excessive land requirements, as laid out in PDO Section 2.19. This view was under-represented to WBC's previous "consultation", due to the quality of that consultation.
- The Government is revising its methodology for calculating housing need. According to placenorthwest.co.uk ("Changes to housing assessment could impact Northern growth", 26th September 2017), the new methodology could result in a 24% reduction on need as compared to current plans. Section 2.10 acknowledged the looming change in methodology; why was the decision taken to publish this highly controversial PDO and consult prior to this change?

- The SHMA report provides a population increase in the borough between 2015-2037 of 24,662 (+11.9%). This is a reduction of 3,000 on 2012 data. The High Court ruling requiring greater house building was based on old data. The latest data shows a lesser need for housing, not more. Also, the 2012 data provided a figure for population increase of 27,662, the 2014 figure was 24,662; whereas, the 2015 data provided a figure of 24,473 i.e. with every data set, the population growth is declining. In any case, dividing the 24k by the Warrington occupancy rate of 2.4 (based on SHMA 2015 population versus households), the housing demand would be 10.4k homes by 2037; far fewer than the 21-24k homes proposed by WBC. 24k homes would translate to an occupancy rate of 1 for every new home. It seems clear that WBC is heavily reliant on attracting internal migrants; however, based on the low skilled work, destruction of ecological and community assets, deterioration in traffic and air pollution and little proposed in the way of cultural enhancement, what does WBC think will attract people to the area? Is it realistic to expect the number of homeowners to be entering the market from beyond the borough to be greater than the number of homegrown buyers?
- There are references throughout the SHMA to the City Region (e.g. section 2.36). It is clear that the production of this report has been led by WBC's *aspiration* to become a city and that the outcome of inflated housing need is supportive of achieving city status (an aspiration not shared by the electorate).
- SHMA section 4.27 states that Warrington has over-delivered on housing supply by 79% between 2002-2015 i.e. 4,731 more houses built than planned. On this basis, it is not clear how the buffer of 5% referred to in section 4.33 would practically work. What is to prevent further over-delivery? The 5% buffer would need to be included within the OAN to avoid over-inflating housing need, which it is not. Furthermore, future housing need fails to take account of substantial over-delivery of housing in previous years.
- SHMA section 5.8 states that WBC have chosen a 25% threshold for affordability of market rented housing as a proportion of income. If market analysis and Government policy suggest 40% is a more suitable figure, WBC is inflating affordable housing need by selecting this lower figure of 25%.
- Section 6.26 of the SHMA states that a 14% increase on the previous assessment of housing need is "largely due to an improved economic outlook". With respect to the above comments, it is difficult to conceive how this assessment could be made. I along with the IMF, Moody's and the national press, would expect a rather drearier economic outlook.
- The Devolution Deal referred to in SHMA 6.27 was voted down by Labour in June 2016. It seems unlikely that devolution will proceed. As a result, inclusion of the Devolution Deal assessment (1,113dpa) should be removed from the analysis, as it creates a false perspective that the lower figure of 955 is moderate, as opposed to an over-inflated outlier.
- With reference to the 10th June 2016 Warrington Guardian article entitled "UPDATED: Labour votes against elected mayor devolution deal offering town 'very little'", it seems that Labour is standing against its own Council leader. Have the people of Warrington been consulted on the proposed devolution deal? In light of this stalled bid, does the Cheshire and Warrington Local Enterprise Partnership's (LEP) have a clear mandate? It seems great resources are being assigned to this partnership, in spite of a council merger (Cheshire and Warrington Combined Authority) being undesirable to voters such as myself and against the wishes of the party in power. On this basis, what weight does the Strategic Economic Plan (SEP) hold? Are the growth forecasts now in need of revision?
- The Oxford Economics forecast uses 2015 data. Due to a deterioration in economic circumstances since this report, and even since the Northern Powerhouse Report from June 2016, it would be appropriate to seek updated economic assessments.

- The Councils' "Employment Development Needs Assessment" (2016) is based on "historic land take-up" and future employment/population change. However, it doesn't consider the suitability of employment type to the demographic of the area. WBC's plans focus heavily on office and warehousing along the M56 and M6 in Grappenhall and Appleton. Warehousing is not suitable employment for the highly skilled population of the parish. Does WBC intend to encourage lower value house building in order to serve these low skilled employment generators? Have the impacts on current homeowners' house values been considered? In relation to my points about WBC's development figures necessitating an attraction of outside populations into Warrington, has WBC assessed how effective the type of (low skilled) employment encouraged via the PDO is at attracting migration from further afield (warehouse jobs are ten a penny up and down the country) i.e. is there a sufficient employment market supply by sector?

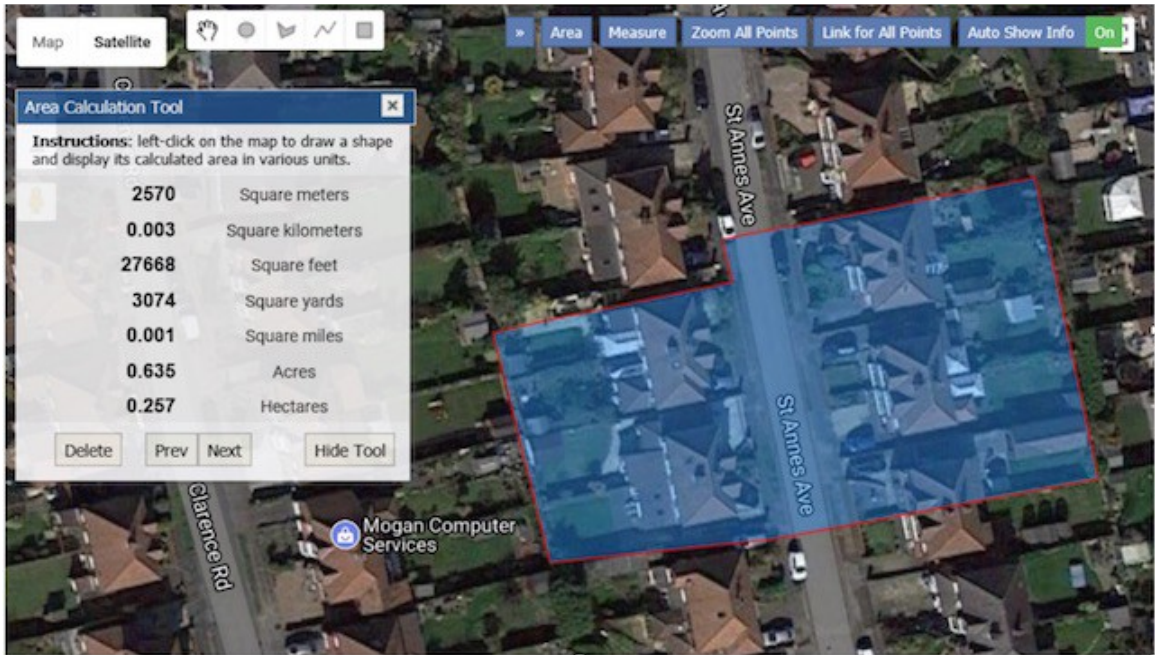
NPPF non-compliance

The PDO is non-compliant with the following NPPF paragraphs:

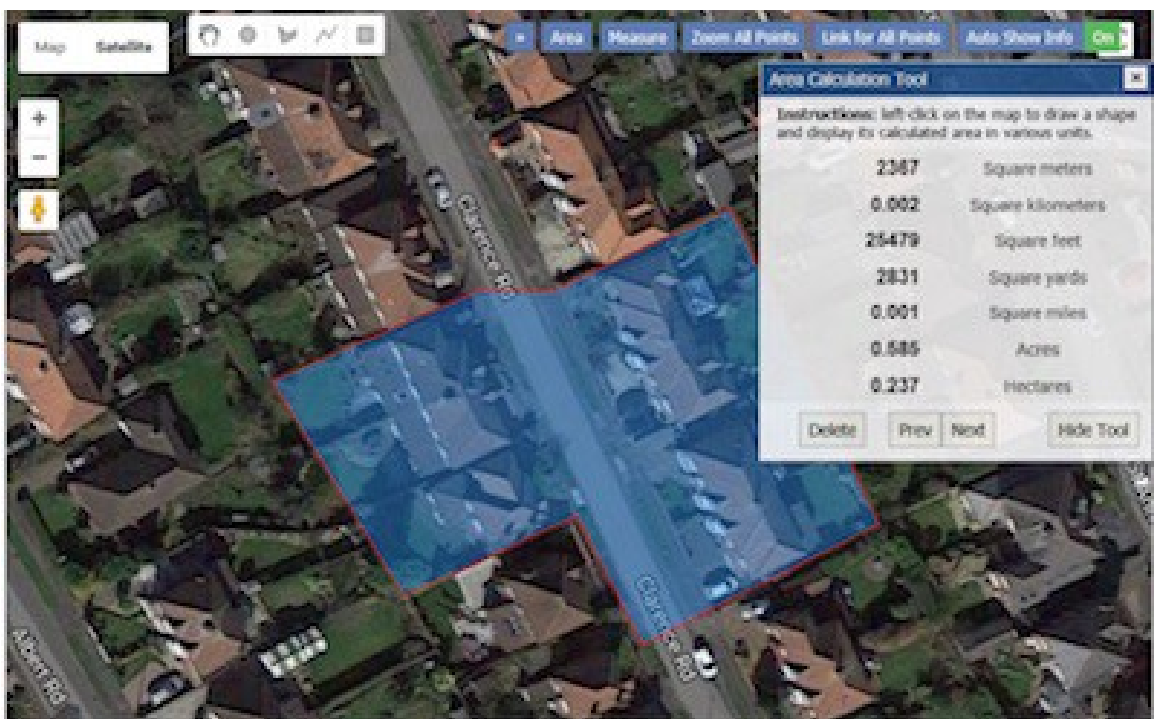
- Paragraph 001 - "safeguarding the environment, adapting to climate change".
- Paragraph 006 - recognising the need for different types of housing, including for the elderly, which is the largest growing demographic in the borough.
- Paragraph 003 - "effective discussion and [consultation](#) with local communities".
- Paragraph 010 - "concentrate on the critical issues facing the area - including its development needs - and the strategy and opportunities for addressing them". Air pollution is a critical issue unaddressed by the PDO.
- Paragraph 018 - the existing infrastructure in South Warrington is already stretched and without the Multi-Modal Transport Assessment promised, there is no data to confirm the extent of the existing problem. The PDO makes vague proposals to improve infrastructure, but certainly does not "make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it".

SHLAA

Contrary to NPPG Paragraph 1, the SHLAA has not assessed plots that would be capable of supporting 5 or more houses. A random selection of 5 archetypical plots in Grappenhall demonstrates that 5 dwellings cover an area of 0.178 ha. SHLAA Paragraph 2.11 does not justify the 0.25ha, as is claimed in the report. 0.25 ha can actually support 8-9 properties based on housing typical of the Grappenhall area (Screenshot 1), which is more generous than many estates in Warrington. A figure of 8+ houses remains appropriate even when using a combination of existing detached and semi-detached properties (Screenshot 2). This would give a housing density of 32 per hectare, which is a relatively low density as compared to recent developments as listed in Appendix 3. SHLAA Paragraph 2.51 states that a density of between 30 and 50 is appropriate. Based on these figures, WBC should be considering plots of between 0.1 and 0.17 ha, rather than 0.25ha. In part, the SHLAA serves to inform developers of land potential. By excluding sites below 0.25ha, WBC is likely to be suppressing small site development i.e. if the threshold for small sites were 5 dwellings, more small sites would be identified in the SHLAA to potential developers, potentially leading to greater development of small sites, beyond the number represented by the small sites allowance.



Screenshot 1



Screenshot 2

SHLAA 2.18 describes how sites were screened and discounted on the basis of national or local policies or designations and a reduced list of sites was subsequently taken forward for further assessment. The SHLAA doesn't state which sites were discounted and for which reasons. Why were some designations discounted, when others such as Green Belt were not? Who has determined the value of one designation over another?

In SHLAA Appendix 2, constraints are either not listed or not sufficiently explored, contrary to paragraph 2.47, “the specific constraint(s) and the action needed to overcome these” has not been documented. To discount all of these non-green belt parcels, only for subsequent documents (Green Belt Assessment) to open up development of green belt land, shows bias towards green belt development over other apparently constrained parcels. The following land parcels have been discounted, but the constraint is not detailed: 1518, 1521, 1535, 1543, 1544, 1553, 1573, 1576, 1594, 1602, 1610, 1621, 1638, 1645, 1706, 1707, 1831, 1861, 2125, 2147, 2180, 2181, 2192, 2246, 2273, 2450, 2455, 2458, 2461, 2482, 2588, 2591, 2592, 2602, 2657, 2689, 2694, 2695, 2699, 2721, 3142.

Urban Capacity

The Urban Capacity Statement Update 2017 Section 2.5 states “The urban capacity figure is a product of the updated SHLAA (2017) figure and the updated Master Planning work undertaken in partnership with Warrington & Co. This has confirmed a capacity for 15,429 new homes over the next 20 years.” Therefore, based on the OAN, there is approximately enough land to build on without developing green belt

Green Belt and the Green Belt Assessment

Section 2.30 - Document reference not provided. Which green belt assessments have changed as a result of December 2016 consultation feedback?

A proposal for 9000 houses in the Green Belt in one authority cannot be sustainable.

The land is not “spare” but supports existing farms and rural businesses. Following the Brexit vote, it would be ill-considered to dispose of land used for food production, given that we may become more reliant on home-grown produce as a nation.

With regards Purpose 2, the character of a settlement should not be solely determined by the distance to another settlement; but also based on the historical and community context in addition to the land between settlements. The Landscape Character Assessment previously planned by WBC (but not delivered), would be useful in this regard. Where have the unique characters of Appleton and Grappenhall settlements been considered, being that these will be merged by the PDO?

Contrary to Sustainability Assessment 4.3.4, which considers Winwick as a settlement, Grappenhall, Grappenhall Heys and Appleton do not appear to have been recognised as unique settlements. The GBA paragraph 43 states that land would be considered for development where it “would cause little harm to the qualities that contributed to the distinct identity of separate settlements”. The definition provided by GBA paragraph 85 assumes that the character of Warrington is homogenous, which is far from reality. The settlements of Grappenhall, Appleton and Lymm are distinct in their character and the sprawl from each area should be assessed on its unique merits.

Further to paragraph 47 of the GBA, what assessment has WBC undertaken of its current policies and their impact on restricting the use of existing brownfield sites? What incentives are provided to encourage development of brownfield sites?

GBA paragraph 49 demonstrates flawed logic and is inconsistent with NPPF/NPPG. Housing and employment need do not constitute exceptional circumstances.

As PDO sections 3.2 and 3.3, housing development is based on the locations requested by developers through the Call for Sites process. Unsurprisingly, the majority of locations selected are greenbelt. Greenbelt is the cheapest, quickest option, providing greatest profit for developers, due to a lack of existing services, structures and contaminated land. Just because Developers haven’t declared an

interest in more brownfield land, doesn't mean it would be sniffed at if Greenfield options were unavailable. This comes across as a "positioning" tactic, which has been bought into by WBC and as a result, has over-inflated land requirements.

Currently, I exit the M56/M6 motorways at Lymm Interchange and am greeted by Greenfields. This is my welcome home and reminds me daily of the green area in which I live and the immediate access I have to the countryside. This country gateway to Grappenhall is critical to the character of the area. It is a mistake to assume that only the built-up areas of Grappenhall contribute to its character. The PDO proposes that the new gateway into the parish is via an office and warehouse expanse, akin to the areas of Birchwood and Omega, which while not an issue for the people who have chosen to live in those areas, is frankly an awful prospect to those of us who have chosen and worked extremely hard to live in the Grappenhall and Thelwall area. By encapsulating the existing parish in an additional blanket of homes and businesses, you are effectively moving the parish towards the urban environment and making access to the countryside more distant. The proximity to the countryside of existing homes is fundamental to the character of the area.

The terminology used in the Greenbelt Assessment is biased towards development of the Greenbelt. On what basis is the green belt "under-performing"? Based on the 5 criteria provided in the documentation, taken from NPPF and NPPG, the green belt would only underperform if it was allowed to be developed. No justification has been provided for sweeping aside our greenbelt.

In the document "Green Belt Assessment – Additional Site Assessments", the site references do not correspond to the plan; therefore, the report is meaningless.

AECOM's South Warrington Urban Extension Framework Plan Document June 2017

The quality of this document is extremely poor. The lack of understanding of local interests and community assets, such as the green space and the TPT is overwhelming. Also, the plan to build houses before providing a transport network capable of accommodating them is poor planning i.e. create a problem, then solve it; as opposed to prevent a problem. It's incomprehensible that WBC would pay a consultant to propose a solution so profoundly unacceptable to local people as building a strategic road on the Trans Pennine Trail. Have you asked for your money back? Please can you return the fee to taxpayers?

Sustainability Assessment

This document lacks impartiality, having been produced by the same consultant, AECOM as produced the WMB Masterplan. The report is poor quality and appears to have been written as an endorsement of the Masterplan, rather than a critical analysis of the facts.

The strategic objectives of the PDO are set out in section 1.2.1. Objective W1, the primary objective, is to transition to a "New City". As previous, what license does WBC have to target this?

Objective W2 is to facilitate development of the green belt. For a sustainability assessment not to raise any issue with this as an objective is a travesty. By what measure is this sustainable?

On a positive note, objectives W3, W4, W5 and W6 are positive and are likely to be widely accepted.

Section 4.6 of the PDO states "...it can address the severe congestion which impacts on the town, unlock major brownfield development sites and improve the quality of life for existing residents through improved infrastructure as well as enabling the creation of new sustainable communities." The improved quality of life claim is unfounded and the air pollution and other

impacts of new infrastructure have not been considered. Quite what is meant by “new sustainable communities” is unclear. I would suggest this is a mis-use of the word sustainable.

Section 4.2.18 does not make a sound case for a larger development being more likely to improve health and wellbeing. This is not an obvious assumption based on the likely effects of increased traffic, air pollution, noise, loss of biodiversity, loss of access to open green belt, loss of amenity including the Trans Pennine Trail and loss of farming capacity.

SA Section 4.3.4 identifies Winwick as a settlement in its own right and has assessed the impact of the urban area merging with Winwick, impacting on the character of the settlement. This may be true, but where is the consistency? It is not apparent that the settlements of Grappenhall, Appleton and Grappenhall Heys have been considered on their own merits for their own unique character. The green belt is a part of these settlement’s character and the separation between settlements too.

Contrary to the sales pitch of SA Section 4.3.6 (namely, the desire to build more houses to justify more infrastructure), new infrastructure including high level crossings and strategic roads is a primary point of objection.

Transport

Warrington may have good access to motorways; however, these are heavily congested, and frequently suffer from accidents/incidents. Whenever incidents occur, the local road network through Warrington becomes gridlocked. A replication of Omega along the M6 and M56 in addition to expansion of Omega itself will only congest the network further. In addition, Warrington is likely to suffer from increased traffic due to the introduction of tolls on the Mersey bridges. What studies have been completed to date to assess the current efficacy of the road and motorway network and what assessment has been made of the impacts of the individual development options? This is absent from the PDO documentation, but should be fundamental to selecting development options. In this regard, refer to GBA paragraph 48, which infers that plans cannot be valid without a traffic impact assessment.

According to Warrington Transport Summary Overview:

- 74% of Warrington residents commute by car (single occupancy journey); far greater than Manchester (63%) and Merseyside (60%).
- 5.4% decline in car sharing, 12.2% decline in commute by bicycle.
- Compared to the country, region, adjacent metropolitans and comparable “New Towns”, Warrington has a smaller percentage commuting on foot or by bicycle, or for that matter, by public transport.
- While slightly different time frames, the report highlights traffic growth has outstripped population growth; possibly highlighting a declining function of public transport. 8% more car traffic and 52% increase in LGVs (2000-2015). The rise in LGV is symptomatic of growth in low skilled jobs, including warehousing. Omega was marketed by WBC as being a centre of job creation for high-tech, high-skilled work; however, this hasn’t materialised. The PDO shows further business areas in the south of Warrington towards the M6. Based on accessibility to the motorway and the experience of Omega, there is little trust from locals that high skilled jobs will be created. More to the point, the housing proposed by the PDO must be of equivalent value to the existing parish in order to maintain the character of the area and to prevent devaluation of existing homes. Therefore, it is hard to conceive where a sufficient supply of jobs for those purchasing in the PDO area and therefore, an increase in those commuting away from Warrington is likely. This will further congest the existing

motorway junctions in the south, which the report highlights are already slowing journey times. Further, this will add to the air pollution already inflicted upon the townspeople.

- The report highlights an opportunity for Park and Ride; however, this is not considered by the PDO. This could be a viable alternative to new roads.
- 19% of all CLC patronage is those leaving the town, only 11% is those arriving. Therefore, any enhancement to rail infrastructure is likely to increase the rate of exodus and therefore, reduce the wealth of the town (spending occurs in the destination towns).
- Grappenhall and Thelwall parishioners can't reach any major centre of employment by public transport in under an hour (see figures 10-12). This reflects my reality, I abandoned the bus service in less than 1 week of my start of employment in Sankey, due to the poor journey times, in favour of car.
- If walking and cycling are below the national average, it would hardly encourage take-up if we were to depart with Warrington's most treasured walking and cycling asset, the Trans Pennine Trail.
- The report does acknowledge physical barriers to active travel. I use the TPT regularly from Grappenhall towards Lymm, but due to the detour, high traffic and high pollution route over the Manchester Ship Canal, I never use the TPT in a westerly direction from Grappenhall. I drive this route regularly and note that it is noticeably lighter on foot and cycle traffic than other sections of the TPT. Therefore, an extension of the TPT along the former railway and over the high level MSC crossing would be highly desirable and would also provide a more attractive proposition for Active Travel into Warrington on both business and pleasure.

With regards to Transport, please can WBC planners read <http://www.ciwem.org/wp-content/uploads/2016/02/Active-Transport.pdf> and feedback how WBC intends to implement the report findings, if at all?

Health

PDO Section 4.3.8 demonstrates narrow-minded logic in trying to address problems rather than the causes of problems. Striving for a larger population in order to justify more health services does not equal a "positive effect on health". In fact, all PDO options will lead to more traffic, more air pollution, more pollution related health impacts and a greater demand on health resources. Furthermore, a reduction in green space for outdoor leisure, including the much used Trans Pennine Trail is likely to see a decline in health. WBC need to seriously consider health impacts of each option, rather than simply whitewashing the preferred options.

Being that "32% of the local population [are] living in areas which are ranked amongst the most health-deprived in the country", would it not be appropriate to provide genuine solutions to causes of poor health e.g. lack of mobility and reliance on cars?

The Royal College of GPs said in 2015 that Warrington was one of the top ten places in England that has a shortfall in the numbers of GPs for the size of our current population. They said we already need a 57% increase in our GP numbers (55). There is a national shortage of GPs. It is not clear in the PDO how the additional GPs the population will need will be found.

When the CQC last inspected Warrington and Halton Hospitals they said that it requires improvement. In a report published in June of this year Warrington hospitals were shown to have missed some of the care standards that they are expected to achieve. These included:

- A&E 4 hour waits – Warrington 91.55%, Target 95%
- Cancer patients having first treatment within 62 days Warrington 75%, Target 85%

- Patients with breast symptoms waiting for 2 weeks – Warrington 87%, Target 93%

Warrington Hospital is under significant pressure. An addition of 24,000 homes and potentially 56,000 people (based on 2.4 persons per household) would severely stretch the service, particularly in light of the ageing demographic.

Air Pollution

According to the World Health Organization (May 2016), Warrington is the 2nd worst place for breaching safe Air Quality limits in the northwest of England.

I refer WBC to a document published in March 2013 by the Chartered Institution of Water and Environmental Management (CIWEM) "Clearing the Air: Priorities for reducing air pollution in the UK". In it CIWEM state that "Local authorities outside London need to ensure that their Local Plans include robust air quality policies that enable them to legitimately reject applications on air quality grounds, or to reduce the negative impact of a proposed development by requiring better design, best practice measures and techniques, and, if necessary, appropriate mitigation." How does WBC perform against these criteria? There is little evidence of it throughout the PDO documentation.

Clearing the Air Appendix: Air Pollution Causes and Consequences helpfully points out the link between pollutants such as NO₂, NO_x, Ozone, Particulate Matter (PM_{0.1}, PM_{2.5}, PM₁₀) and Benzene from road transport, exposure to which increases the following health consequences: cardiovascular disease (stroke, heart attacks), cancer, premature birth, infant mortality, low birth weight, reduced cognitive development, potential impacts on the central nervous system (by UFPs), anaemia, leukaemia, increased susceptibility to allergens, coughing, asthma incidence, asthma severity, and lung function growth, coughing, wheezing and shortness of breath, headache, tiredness, nausea and dizziness.

In addition to the health impacts, the aforementioned pollutants as well as VOCs, SO₂, Ammonia, Carbon Monoxide, Heavy Metals (Arsenic, Lead, Mercury, Zinc, Cadmium), and Toxic organic micropollutants (TOMPs) are harmful to the environment, aquatic environment and contribute to global warming.

Further, www.nhs.uk identified in an article on 5th January 2017 that "people who live near busy roads have higher dementia rates". This could be particularly problematic given the ageing population in Warrington.

What is WBC doing to combat the above causes and effects e.g. have you considered establishing low emission zones? This is not apparent in reading the PDO documentation.

Why has the baseline air quality data not been provided with the PDO, in addition to forecasts based on the 5 options? This should form part of the option appraisal.

Hidden tax via water bills

More houses equals more water abstraction and treatment, requiring power and chemical consumption. It also means increased wastewater volumes, requiring power and chemicals to treat and ultimately emitting untreatable pollutants to watercourses. United Utilities' treatment capacity appear not to have been considered. Development of this scale would be highly likely to require significant capital investment at the treatment works to support the growth in population. This would be borne by bill payers as a hidden tax and should be considered in a cost-benefit analysis, which is also conspicuous in its absence.

Energy

With the planned closure of Fiddler's Ferry, how does WBC intend to maintain power to existing homes, let alone an additional 24,000 homes?

Alternatives not explored

Warrington Landfill could be housing instead of replacing brownfield with green space and green field with new housing. This option has not been explored. The council has imported vast quantities of waste from outside the borough and has earned money in the process. It would seem fair to release some of this money to reclaim the land WBC has contaminated. Is WBC applying the polluter pays principle?

Much is made throughout the PDO of a requirement for new high level bridges. This demonstrates a skipping of fundamental steps in the design process; namely, optioneering. I would like WBC to consider all of the options available for improving the current traffic congestion (and its contribution to air pollution), in addition to planning for the future. This should include the prospect of road tunnels beneath the Manchester Ship Canal and River Mersey, which would reduce the impact of swing bridges, reduce the need for traffic lights and reduce the aesthetic impact. Further, I would like WBC to consider the maximum possible use of existing A roads, thereby maintaining traffic impacts on existing properties and residents who have bought into the effects of traffic.

Yours faithfully,

[REDACTED]

[REDACTED]