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Dear Sir / Madam

## **OBJECTION TO THE PREFERRED WARRINGTON LOCAL DEVELOPMENT PLAN**

Please find detailed below my objections to the proposed Warrington Local Development plan. I strongly object to the proposals and cannot understand how decisions can be made that will completely and utterly change the face of South Warrington and only for the worse. I have detailed my major concerns, but really there are so, so many more.

### **1. Traffic**

- A high level traffic survey has not been included in the PDO. There is no detailed traffic computer models/desk study or indeed "live" data or evidence demonstrating the implications for the road network. The implications for South Warrington are potentially horrific. Existing roads and routes will experience extensive traffic congestion and pollution. This is a crucial component of the LDP that has not been fully assessed.
- 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. For example the recent closure of the Thelwall Viaduct for emergency repairs. Many local residents abandoned their cars because they just could not get home.
- South Warrington is uniquely positioned in the fact that you need to cross 3 bodies of water to travel; River Mersey, Manchester Ship Canal and Bridgewater Canal. There are not enough bridges to take the increased flow of traffic that will consume our roads. Added to this the Atlantic Gateway with additional traffic down the canal increasing from 800 containers per year to 1000, therefore the swing bridges will be turning on an even more regular basis, which causes utter chaos at peak times of the day.
- The PDO includes a number of routes which cause serious concern. These routes will result in the deterioration of the quality of life for current residents who will be subjected to increased noise, air pollution and vibration from the increased traffic flow:
  - ❖ *The "Howshoots Link" from Grappenhall Heys to the M6 junction - will become an alternative HGV route for traffic coming to/from Warrington and Runcorn areas that will increase traffic flowing through the A49 and A56 in Stockton Heath.*

- ❖ The 'Eastern Link Road' from M56 Junction 10 to the north of the Manchester Ship Canal 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.
  - ❖ 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. This route would be detrimental to the people currently living in this area.
  - ❖ Warrington residents have to pay the tolls to cross the new Mersey bridge crossing. There is concern that the Link new roads through South Warrington will attract traffic that would otherwise have used the Mersey crossings if there was no toll to pay.
  - ❖ The CPO of properties that will be required to put the new roads in.... where will the money come from for this?
  - ❖ What about the properties that will not have a CPO but will have the new roads built right in front of them? You are reducing their house value and creating a hardship for those families who would never have dreamt of buying a house next to a main road/dual carriageway! Families who chose to live there because of friends, families and schools. A house is not just bricks and mortar – this is home.
- How is the infrastructure of these essential roads going to be financed? Will Section 106 Agreements provide sufficient funds to cover ALL the necessary infrastructure? Will there be the funds there from the Government to fund the high level bridge? It is imperative for the infrastructure to be in place before any houses are built as the current roads will not suffice and most definitely are not connected to existing public transportation.
  - The finances are a huge concern as Warrington Borough Council cannot even look after the town as it is – we have a huge litter problem that will just be out of control, our current roads are in disrepair and the landscaping works are not regular enough. Why on earth would you be attracted to Warrington to come and live?
  - Terry O'Neill promised in the Warrington Guardian on the 12<sup>th</sup> July no houses would be built until new infrastructure was in place. "We need to get rid of congestion – Council Leader promises no homes will be built until infrastructure in place. He further added "before one single house is built we will put the infrastructure in before – that is a promise I say to everyone involved".
  - In the 2011 Census, 81% of Warrington households had access to at least one car / van with 39% having access to two or more cars / vans. Nationally, just over a quarter (26%) of households had no access to a car / van which was considerably higher than in Warrington (19%) indicating higher levels of car ownership in Warrington. If a further 24,000 households are created in Warrington without substantial investment in sustainable transport options, the traffic situation will deteriorate further. **THIS IS APPROX. 48,000 MORE CARS ON OUR ALREADY INADEQUATE ROADS** and doesn't even take into account children aged 17 who still live at home who also have cars.
  - How do you propose emergency vehicles will cope with the congested roads in arriving at emergencies? This could be a case of life and death. Have you consulted the Police, Ambulance or Fire Service?
  - Please see attached photographs demonstrating traffic congestion as Appendix 1.

## 2. Lack of Environmental / Air Pollution Study

- No high level environmental impact survey has been included in the PDO.

- There are a great variety of animals and birds that live in the greenbelt areas including badgers, water voles, great crested newts and bats. Where will they be relocated to if the green belt is to be used? The loss of green belt / field land will be catastrophic for the wildlife.
- No pollution study has been included in the PDO.
- According to the World Health Organisation, ambient air pollution is the greatest environmental risk to health and causes more than 3 million premature deaths worldwide each year. In May 2016 Warrington was voted **the second worst town / city in the North West for breaching safe levels of air pollution** (second behind Salford). In addition, Warrington's 2016 Air Quality Annual Status reports claims "Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally air pollution, particularly affects the most vulnerable in society; children and older people and those with heart and lung conditions". In 2013 nearly 5% of deaths in Warrington were due to man-made particular pollution. The report adds that in Warrington there are many areas close to major roads where nitrogen dioxide levels are high and exceed national standards. Warrington Borough Council has measured these levels in 50 places and in 2015 nearly 60% of these exceeded the Council's objective of 40 micrograms of nitrogen dioxide per m cubed. What will be the increase with 48,000 more cars on the roads? Unfortunately we also now live in a world of "if there's blame, there's a claim". Is Warrington Borough Council prepared for legal claims coming through for medical bills and deaths? We are already aware of new fines being levied.
- Our green fields and green belt are our natural drainage. If they are built upon you are taking this away and more flooding will occur.

### 3. Significant loss of Green Belt Land

- The PDO indicates the release of greenbelt land to support 9,000 new homes over the next 20 years, however, 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". In addition to this the Government White Paper strongly supports the avoidance of using green belt land.
- Accordingly the reasoning behind the scale of green belt release in South Warrington is based on the Arup report's assessment that states our Green Belt as being of low value. I do believe through a planning consultant that the Arup report is fundamentally flawed in its assessment of our Green Belt therefore as such should be reviewed. There are plenty of other areas which could take their share of housing to reduce the impact in South Warrington.
- This land in question 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 green belt land, or at least a smaller portion of it, should be considered.
- Brownfield sites should be exhausted before any building is permitted on Green Belt Land. Fiddlers Ferry should be considered and added to the numbers. The Government's White Paper states:

*"Also taking action to radically increase brownfield development and to bring life back to abandoned sites. That means high quality housing for families in town centres, breathing new life back into our high streets, turning abandoned shopping centres into new communities and increasing density of housing around transport hubs to build homes that people want to live in".*

- The regeneration of Warrington Town Centre with accommodation therein should be considered before green belt. Young adults want to live where most convenient and not in the “suburbs”. Proposing a higher density in the town centre would match the desire of many new potential home buyers for housing without gardens, close to the town centre for social life and close to public transport hubs to avoid needing cars. But the town needs cleaning up first!
- House builders will purchase green belt land and even the green field land at a premium and therefore will need to sell the properties at a premium – they are favoured due to the lower costs of development and the value of the homes they produce. Despite the provision for affordable housing, the properties will still be out of reach for first time buyers and young families as the properties will only be approx. 20 – 25% lower in price. An example of this is the current Grappenhall Heys development off Astor Drive. The original plan that was given planning permission was for 4 and 5 bedroom detached properties. The builder could not sell them so changed the plans to townhouses and apartments, which has created the major problems in parking in Bourchier Drive and Tresham Drive. The apartments are frequently empty as they cannot be rented out to young people as they don’t want to live so far away from the local facilities i.e. Stockton Heath or Warrington. I am convinced this would happen again.
- The purpose of green belt is to prevent urban sprawl... by utilising the green belt land between Halton and St Helens means we will effectively be **St Warringcorn!** By joining together the parishes of Hatton, Stretton, Appleton, Appleton Thorn, Grappenhall, Grappenhall Heys and Lymm means their identity will be lost. A village is a village and should stay a village and that is why residents choose to live there. Irrespective of “progress” and the need for housing, you are taking away the very “home” we all live in and completely changing the shape of South Warrington for ever.
- In the proposed local plan 93% of the houses to be built on green belt are south of the Ship Canal, where a fifth of the population live with only 7% to be built north of the Ship Canal, where four fifths of the population live. Call me cynical but you cannot ignore the North / South Warrington divide. In addition at the recent HCA Planning Application, Counsellor Peter Carey’s comments were undemocratic, insulting and unprofessional, which is extremely worrying in relation to decisions on future planning and development in the area. He clearly had a negatively biased view of the South Warrington area following his analogy to the Omega developments he referenced at the meeting and this further compounds the North/South Warrington divide.

#### 4. Amenities

- Warrington Town Centre needs to be developed before any properties are further built in South Warrington. There are shops closing down and it is not at all good for shopping. It is far nicer to venture to Cheshire Oaks or the Trafford Centre than to shop in our own town. Even with the new Junction 9 Retail Park, the traffic to get to the other side of town is so bad it is just not worth the journey so many residents shop away from their own home town. Surely it is better to see if the locals start to shop again in Warrington once it has been regenerated before bringing “new” residents in.
- There is no mention of hospital capacity at Warrington or Halton. The NHS stated they need £250m to see this winter through.... How would Warrington and Halton hospitals cope with the vast increase in people?

#### 5. Appleton Thorn Trading Estate

- It is understood that more logistic and warehouse firms will be relocating to Appleton Thorn Trading Estate and it is the employees from these companies that will be purchasing the new homes in South Warrington. With no disrespect to them the salaries that they will achieve will not suffice for the house prices and most definitely not the new builds.

## 6. Stockton Heath

- Is not specifically mentioned in the PDO and yet is the nearest village for all of South Warrington. Stockton Heath is already over capacity as far as traffic and parking is concerned. The traffic through this village is regularly at a standstill due to the sheer number of cars on the roads and the swing bridges turning.
- The traffic lights at the junction of the A49 and the A56 in Stockton Heath are already operating at capacity.

## 7. Miscalculation of Housing Requirements

- 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, Warrington Borough Council should have utilised the May 2017 addendum that was possession of. The updated May 2017 report is based on 2014 data showing a comparable figure of just 738 homes per year (but could be as low as 679 homes pa), but this number has been ignored.
- The projections used are based on data periods prior to the Brexit referendum. The Plan should be based on an updated Strategic Housing Market Assessment that takes account of latest economic, demographic and migratory expectations.
- In addition, the housing requirement should be based on a calculation of OAN that is consistent with the methodology and data underpinning the Government's September 2017 proposals for a nationally consistent approach.
- There is no Government requirement to produce a twenty-year plan even if long-term ONS statistics exist.
- I challenge the Council with regards to how they have calculated the housing requirement figures!

## 8. Inadequacy of the Consultation Period

- The sheer deviousness of the Council by having the consultation period during the summer holidays. Consultation should provide adequate time for a response to allow the public meaningful participation.
- There should have been more street notices, press releases and letters sent to Warrington residents who this would affect the most. The website is not sufficient.
- Communication has been very poor.
- I refer you to Appendix 2.

To summarise, no logical thinking has gone into this plan whatsoever. You have simply reviewed a map, seen lots of green fields and chosen that as the preferred option. Any additional growth in South Warrington without significant investment in infrastructure will place unacceptable pressure on the local highways network, health facilities, schools, and may have significant impacts on secondary provision in south and central Warrington. Incremental growth would not positively contribute to the Council's New City Aspiration. City – pffffff!

Yours faithfully



Encs: Appendix 1 – photographs of traffic  
Appendix 2 – Extract from a Supreme Court case regarding Local Authority Consultation

Grappenhall Heys

Astor Drive by Site Access A



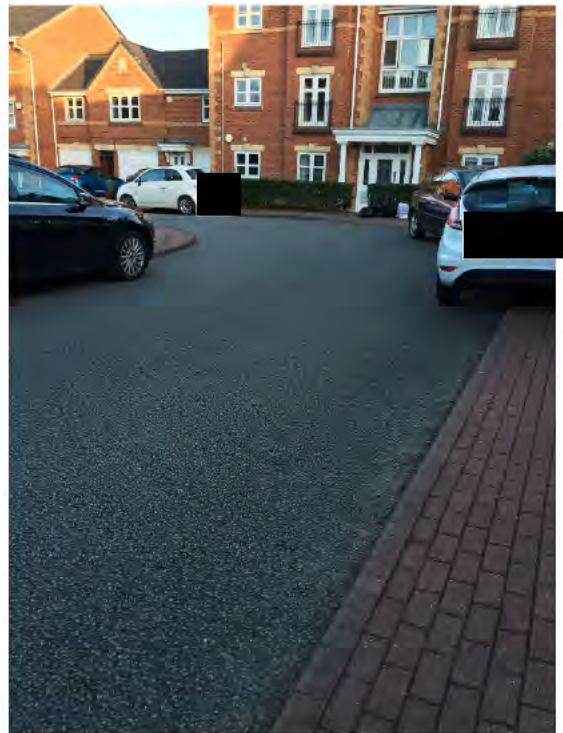
Astor Drive Approaching Site Access A



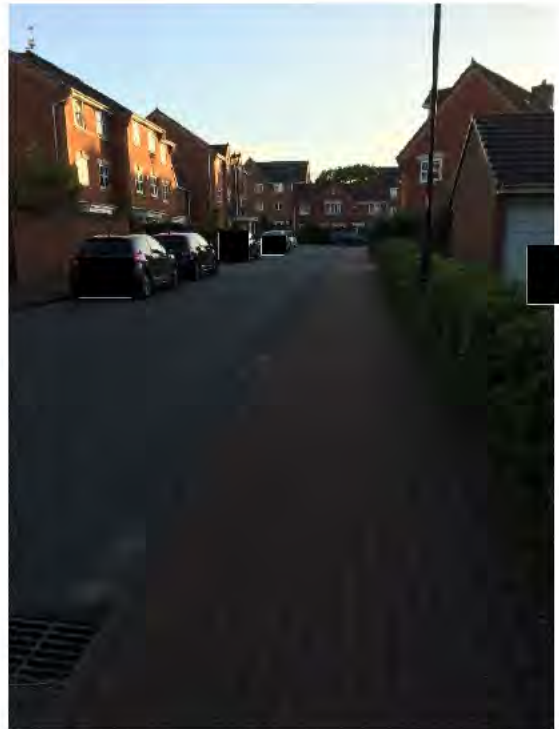
Tresham Drive at the Junction with Bouchier Way



One Corner of Bouchier Way



**Bourchier Way (example of where cars park – usually more than this and on both sides!) This WILL be used as a route to the Emergency Access at Tresham Drive – preposterous!**



**Tresham Drive – parked cars on narrow road and grass verge showing where children always play – again completely inadequate for an emergency access.**

**The above photographs of Tresham Drive and Bourchier Way are where the Emergency Access is proposed – as you can see extremely inappropriate due to all the traffic, which has already caused an ambulance to abandon a call.**

**Astor Drive at a weekend**



**Roundabout and Witherwin at a weekend**



**Witherwin Avenue at a weekend visiting the Walled Garden – how can all these cars drive down Stansfield Drive to the car park?**





Parked Cars on Curzon Drive at a weekend as a result of visitors to the Walled Garden



Top end of Witherwin Avenue



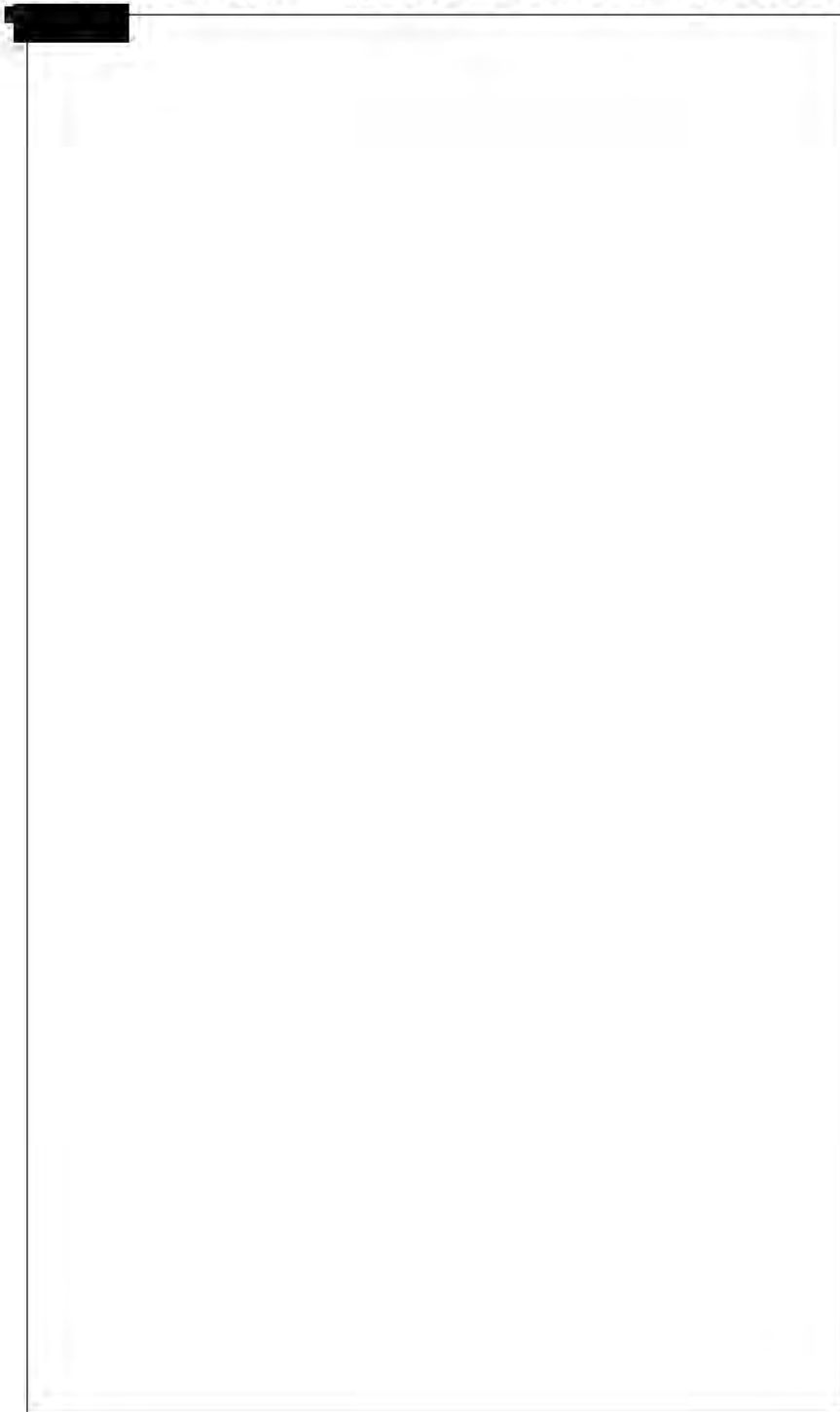
**Double Parked Cars on Witherwin Avenue !**



**Witherwin Avenue by Broomfields Junior School showing traffic up to roundabout**



**Grappenhall Heys Primary School – Stansfield Drive/Keepers Road**









**Broad Lane and Church Lane (Grappenhall) Queueing Traffic  
(accident on motorway)**







**Lumb Brook Road / Bridge**



**As you can see there are stationary cars under the bridge, which inevitably remain there after the traffic lights have turned to red thereby obstructing any cars from coming off Grappenhall Road.**



**Lumb Brook looking up towards Grappenhall Heys**

**Lumb Brook traffic travelling away from Grappenhall Heys to Lumb Brook Bridge**



**Traffic on Bridge Lane /Dale Lane Trying to Access Lumb Brook Road**



**Whilst taking these photographs this car was so frustrated with the queue of traffic they did a 6 point turn to go the other way!**



**Bridge Lane by the Cobbs School (catchment area for Grappenhall Heys/Appleton Cross children)**



**Bridge Lane by Broomfields Junior School (catchment area for Grappenhall Hall Heys and Appleton Cross)**



**Broomfields Road (Bridgewater Upper / St Monica's Primary School) (catchment area for Grappenhall Hall Heys and Appleton Cross)**



**Cat and Lion Junction A49 London Road (traffic queueing beyond the mini roundabout at Owens Corner)**



**The traffic below is by the mini roundabout at Owens Corner**



## Junction 10 M56 Traffic





Traffic approaching/leaving Cantilever Bridge in Rush Hour



## Notes regarding Warrington Borough Council's flawed consultation process

A Supreme Court case against Haringey Borough Council in 2014 set the benchmark for the standards of local authority consultation. The case made it clear that while there is no general legal duty to consult people affected by a decision, a duty to consult may arise out of the Council's **common law duty of fairness** (R(BAPIO Action Limited) v Secretary of State for the Home department [2007] EWCA Civ 1139).

The key message from the Haringey case is that consultations must be carried out fairly. Looking at issues of who, when, how and evidence based analysis.

1. Who should they consult- the demands of fairness are higher where the authority contemplates depriving someone of something;
2. How should they consult – if someone is likely to be worse off they should be specifically identified and consulted;
3. When to consult- it should be done with sufficient time to allow people to know what you are thinking of doing, telling them the options and giving time for them to reflect on it:
  - a. Consultation should be at a time when the proposals are still at a formative stage to allow for "intelligent consideration and response";
  - b. Adequate time must be given;
  - c. It must allow the public meaningful participation in the process;
4. Analysis- The data collected from the consultation must be handled and objectively managed – there must be sound data collection, processing and analysis.

Warrington Borough Council has failed in several respects.

The highest court in the land requires that if a person is to be worse off as a result of the proposals they should be contacted directly by hand delivered letters and by telephone if necessary. This should have been reinforced by street notices and press releases. None of which have been done by the council. The courts have determined that use of the Council's website alone is not sufficient. People affected should have been identified and targeted with communications. Most of Grappenhall will consider themselves to be worse off as a result of these proposals but a number will definitely lose businesses and property. Communication has therefore been ineffective and compromised the consultation process.

There appears to be no evidence of a scoping exercise around the consultation and no steering group. The greater the involvement with the community the better. No links have been forged with local groups, community representatives, bodies and forums to ensure understanding of the proposals and also the process.

It is not clear how the council has determined the necessary period of consultation. It has given the minimum time possible for people to be consulted. Consultations of this size and nature could last for 3 months. It has consulted over the holiday period meaning a large proportion of those affected will not have been made aware of the consultation being carried out or have been unable to access the information.

There is no evidence of a communications strategy. The communication has been very inadequate. The information is poor and the plans are illegible. Information from the planning officers at the public meetings has been conflicting and unclear. In addition, the data and documents provided in the consultation are not digestible during the period allowed for the consultation.

There has been no proper access given to the consultation documentation. The information has been placed online and at libraries only as far as we are aware. Only a limited amount of paper forms have been made available and then only on request and by collection from the council offices. The Council have relied too heavily on online forms and information. The council should not assume that people have access to technology.

There has been no proper data collection at the consultation meetings. A note of the number and name and address of attendees was not taken. Feedback forms were not provided to the attendees to allow the council or any other relevant body to determine the usefulness and appropriateness of these meetings. Attendees at the meetings did not see the council's planners taken any notes of comments made to them.

The consultation timetable does not even seem to include the requirement for a report to be produced summarising the results of the consultation that is currently being carried out.

The council have failed to provide a proper consultation plan including a communications plan. This should have been drafted, tested and then implemented. People have not been enabled to take part in this extensive plan consultation. The council must give active consideration of the data collected.

Even in times of local government austerity this is not just best practice it is a requirement.