



Appleton Parish Council

Appleton Parish Hall, Dudlow Green Road, Appleton, Warrington,
Cheshire WA4 5EQ

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12th June 2019

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

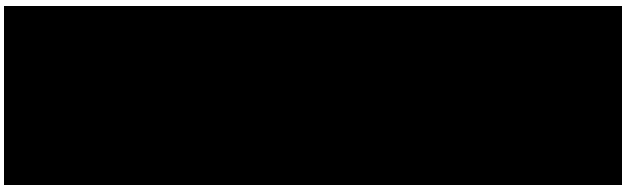
Dear Sir

Appleton Parish Council's response to the PSV Local Plan 2019

Please find attached our comments in respect of the Local Plan. We would be grateful if you would kindly acknowledge receipt by return.

We would also like you to note that Appleton Parish Council requests the right to speak when the Plan is put before the Secretary of State. Please acknowledge this request.

Yours faithfully



Sharon Harris
Chair, Appleton Parish Council



Appleton Parish Council

Response to the LDP

June 2019

Appleton Parish Council
Appleton Parish Hall
Dudlow Green Road
Appleton
Cheshire
WA4 5EQ



Introduction

Appleton Parish Council was formed in 1894, it represents approximately 10, 200 residents and extends over 1331 hectares. Our residents constitute 5% of the Borough's population. The Parish Council consists of thirteen members.

Warrington was designated as a New Town in 1968. The Warrington and Runcorn New Town Development Corporation set aside land in South Warrington for future development. This development was never completed and has remained largely unspoiled and in agricultural use. Over time the land came under the control of English Partnerships, the Homes and Communities Agency and now to Homes England. Historic consents for building have been passed down and Appleton Parish Council contest whether there should still be any extant permission to enable further development. The demise of the New Town concept has meant that many of the problems residents currently experience relate to a chronic lack of infrastructure (health, education and highways).

Appleton Parish Council have read the LDP in detail. We have attended WBC's information sessions held recently and we have asked extensive questions to understand the ramifications of the LDP. Along with many of our residents, we have found the planning system to be difficult to navigate, hence we may have been unable to find some of the documents required for a more detailed response.

Overall though, we feel we have read and researched enough to comment from a position of knowledge and confidence on the LDP. We have multiple concerns. Our main ones are described within this document.

Green Belt

The Plan does not meet the criteria for 'special circumstances' to release Green Belt as set out in the NPPF. The Plan does not make a sound case to justify the loss of 11% of Warrington's Green Belt land, the vast majority of which is in the southern part of the town.

The Green Belt serves five purposes:

- 1) to check the unrestricted sprawl of large built-up areas;
- 2) to prevent neighbouring towns merging into one another;
- 3) to assist in safeguarding the countryside from encroachment;
- 4) to preserve the setting and specialist character of historic towns;
- 5) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The Plan seeks to inappropriately use Green Belt land. The economic justifications and projections lack credibility and are based on an over optimistic economic view put forward by the LEP and Warrington Borough Council. Even though Warrington continues to be

economically attractive for companies we would suggest that those projections are several years out of date and not sustainable in the current climate of uncertainty. Any perceived economic benefits do NOT outweigh the harm to the Green Belt and surrounding communities.

These 'bullish' projections are used to justify an exceptional number of new houses which, judging by Warrington's previous history in not being able to fulfil its housing targets mean that the LDP is undeliverable. The housing figures required to achieve Warrington's target of 945 per year over a 20-year period are over-ambitious. In recent years Warrington has only ever been able to build around 500 homes a year. The Plan is developer lead and will encourage land banking. James Brokenshire, Secretary of State for Housing, Communities and Local Government categorically stated the following in a letter to Lymm Parish Councillor, Andy Carter in April this year:

"I would emphasise that a housing need figure is not a target...planning to meet that need will require consideration of land availability, relevant constraints, and whether the need is more appropriately met in neighbouring areas."

So why it is that Warrington Borough Council is doggedly pursuing an unrealistic and undeliverable Plan?

Much of the Green Belt land at risk was re-categorised from strong to weak or moderate in terms of its contribution to Warrington's Green Belt. This report was commissioned by Warrington Borough Council and produced by Ove Arup. The report facilitates, and is used as a justification for, an aggressive onslaught on a precious commodity that has an enormous beneficial impact on the health and well-being of all residents in Warrington. We question the soundness of this report. Once green, open spaces and recreational spaces are lost, they are lost forever.

Most of the Green Belt being lost is in the south of the town and will result in Appleton Thorn being subsumed into Appleton and Grappenhall with the potential for three new villages on the horizon. The distinctive village feel will change from a rural to urban. It has already been subject to recent development both in the village and around it with the potential of large major employment areas on its doorstep. The criteria to demonstrate 'special circumstances' to release Green Belt land is NOT met here as this does NOT "safeguard the countryside from encroachment" but enables it to happen.

The 2014 Adopted Core Plan Strategy states that "The continued protection of the Green Belt has ensured that settlements ... have not encroached onto open countryside."

Stretton Village is also under threat as new developments are already bringing it closer to Appleton Thorn and the new Appleton Cross development. This encroachment will destroy the unique feel and heritage of these villages and the Plan is, in effect, enabling it to happen and encouraging "an unrestricted sprawl of large built up areas" Indeed the Green Belt does need to be used then there needs to be a more equitable spread across the town, both north and south of the River Mersey.

Appleton Thorn Village produced its own Neighbourhood Development Plan in 2017 and this currently sits within and carries legal weight in the current 2014 LDP. Appleton Parish Council asserts that the Appleton Thorn NDP has not been adequately reflected in the Proposed Submission Version (PSV) of the LDP.

The PSV of the LDP 2017-2037 and the Vision – Warrington 2037 (pp 17-18) makes no mention of preserving the Green Belt and states:

“The character of Warrington’s places will be maintained and enhanced ...surrounded by attractive countryside and district settlements. The unique elements of the historic, built and natural environment that Warrington possesses will be looked after, well managed, well used and enjoyed.”

Appleton Parish Council does not agree with this statement. The scale of the development will destroy the historic landscape, remaining agricultural land use, open countryside and semi-rural location forever.

Green Belt boundaries were confirmed five years ago and were intended to last for twenty years. They should not be prematurely changed. NPPF planning policy and guidance clearly states that permanence of Green Belt is of imperative importance, as its legacy will last beyond the planned period.

The "special circumstances" to "preserve the setting and special character of historic towns" are NOT met in respect of Appleton Thorn, Stretton and Grappenhall villages. Any remaining Green Belt will have lost its function - see criteria above. The loss of these particular areas of Green Belt will not only affect local residents, but all residents in Warrington.

Garden Suburb

Our first concern with the Garden Suburb is its scale. We strongly object to the fact that it takes the entire Green Belt surrounding Appleton and Appleton Thorn. The scale of the Garden Suburb (circa 7400 houses) creates more houses than currently exist in Appleton, Stretton and Hatton. Moreover, even though the plan is presented as detailed and thorough, we have been informed by WBC that the plan is merely “illustrative”, it has no planning status, and is not approved by WBC. It will be further refined by Supplementary Planning Documentation. Yet the LDP is the only opportunity for us to make comment and object, otherwise we fail to see the point of engaging in this consultation process. We believe the Council are presenting the plan as illustrative during consultation but will quickly firm it up with little change once they have been seen to have gathered views.

Appleton Parish Council believes the LDP is not sound because we have no detailed plans of what the Garden Suburb will look like and to approve anything so conceptual is morally wrong and a dereliction of our duties to our Parishioners.

The scale of the proposed changes will mean that our villages and small hamlets will become one gigantic conurbation with no buffer between any of the existing villages, destroying their character and distinctiveness.

The LDP shows a 40-metre wide dual carriageway/mass transit route cutting straight through a Garden Suburb. What a terrible irony. WBC could not confirm that this route would not be accessible to HGV's en route to the employment zone which is almost exclusively a logistics/transportation hub. The idea that a 40-metre road would be necessary for light commuter traffic coming to and from a Garden Suburb is farcical. If it is what we suspect, an alternative route for HGV's accessing the logistics site, we are totally opposed to it. We already know there are significant capacity issues with Junctions 9 and 10 of the M56 and the impact of the scale of this road, our health and wellbeing would be devastating. (Please refer to our comments on air pollution.)

The Localism Act 2011 provided communities with the ability to make a contribution to their community with Neighbourhood Plans. The Appleton Thorn NDP was the first to be written and adopted by WBC. It took over three years to write and took hundreds of hours of residents' time, care and patience. The NDP that WBC signed up to was about the special character, heritage and its Green Belt. The LDP tears up the very essence of the NDP. Moreover, the NDP should be an integral part of the LDP. Much trust has been lost over this issue and the Council have lost credibility that any future NDPs will be treated with the same contempt as this one.

Heritage assessment and impact

South Warrington's identity is characterised by a number of small villages: Appleton Thorn, Walton, Stockton Heath, Grappenhall, Thelwall and Lymm. This a strong historic identity and each has unique historic assets, which is characteristic of South Warrington. Each benefit from being located within open countryside and the Green Belt.

Warrington Borough Council's adopted Local Development Plan 2014 stated the Vision in 2027 (p136).

"There is a secure long-term Green Belt and the countryside is sustainable and attractive with a thriving rural economy and communities. Farm diversification is supported by a positive approach to development management. Improved access, amenities and visitor attractions area encouraging more people to enjoy the countryside but not at the expense of character, tranquillity ad biodiversity.

The continuous protection of the Green Belt has ensured that settlements ... have not encroached into open countryside."

And on p138

"Support needs to be afforded to maintaining and where possible, growing the rural economy particularly through appropriate diversification. Additional pressures on the countryside need to be carefully managed if its character, appearance and the many functions it performs are to be protected and enhanced."

Yet only five years later we find the proposed LDP states:

“The total amount of development, and the broad locations proposed could mean that there are limited areas that are completely free from built development between each of the proposed new villages and the existing settlements of Grappenhall, Grappenhall Heys and Appleton Thorn.”

Overall, the potential impacts on landscape could be significant and negative.

Although the amount of land at each area and the parcels proposed for removal do not make a strong contribution to the Green Belt, this is still substantial and would adversely affect landscape character and extend the built form. In this regard, a negative effect is predicted.

Parcels of land that are currently performing strongly (as Green Belt) will be surrounded by built development, and so this value will be diminished. Furthermore, the character of existing settlements in Appleton (Thorn) are likely to be significantly affected.

The proposed development will have a moderate impact on a number of heritage assets as listed in the Heritage Assets supporting documentation

- Beehive Farmhouse Barleycastle Lane, Appleton
- Shippon at Booth's Farm Barleycastle Lane, Appleton
- Booth's Farm Farmhouse Barleycastle Lane, Appleton
- Barleycastle Farmhouse Barleycastle Lane, Appleton
- Tanyard Farm Building Tan House Cottage, Appleton
- Tan House Barn & Hunters Moon Barleycastle Lane, Appleton
- Bradley Hall moated site South of Grappenhall Lane/Cliffe Lane junction, Appleton

- Yew Tree Farmhouse
- Church of St Cross
- School Farmhouse
- Laurel Cottage (Pepper Street)
- Cross Cottages
- Wright's Green Cottage
- Wright's Green House
- Lumb Brook Bridge - Two sections of Roman road between Appleton and Stretton lies mainly in their archaeological and historic interest.

Appleton Parish Council believes that there is more than a moderate impact on a significant number of buildings which shape the character of the area and the mitigation measures proposed will be insufficient and acceptable.

Appleton Parish Council would like to know:

1. Why is Green Belt land being re-categorized to accommodate a such a plan when James Brokenshire emphasised that the Housing Need figure should not be a target?
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2. If the criteria to demonstrate 'special circumstances' to release Green Belt land is NOT met, is WBC aggressively pursuing an unrelenting attack on the Green Belt in South Warrington?
 3. If the Garden Suburb documentation changes after the LDP has been adopted, where has our democratic right to consultation gone? If it does not change then it was not "illustrative".
 4. Why have WBC chosen not to honour the NDP for Appleton Thorn that they adopted less than two years ago?
 5. Is the argument for taking Green Belt land for commercial use justified?
 6. Are Warrington Borough Council's tenuous arguments for aggressive and unrealistic economic growth enough to justify taking Green Belt land with strong agricultural value, when Warrington Borough Council is basing its plan on unsustainable growth and delivery?
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Housing need

The baseline figure for Warrington based on 2014 household growth figures established a figure line of 792 houses per annum. The Council's adopted fifteen-year 2014 LDP predicted there was sufficient land for housing: 10, 500 dwellings between 2006 and 2027 without need to touch the Green Belt. However just a few years later, the proposed LDP is for a minimum of 19,080 new homes (equating to 945 per year) between 2017 and 2037.

Appleton Parish Council along with other South Warrington Parish Councils finds the methodology for calculating housing need confusing and contradictory. We believe that plan figure of 945 is based on a speculative and over ambitious (given the current economic climate and the ongoing uncertainty over Brexit) figure from Cheshire & Warrington's Local Enterprise Partnership's Strategic Economic Plan. It seeks to justify this position based on a high level of economic growth stimulating demand for new housing.

We find the only justification for predicted levels of growth which are central to the proposed the spatial expression of the plan is the development of logistics warehousing at the M6:M56 junction.

There is a complete mismatch between the number of houses proposed and the estimated number of jobs. Moreover, there is no evidence to show that those taking up the jobs in the logistics/warehousing sector will want or are able to purchase property within the Garden Suburb development. South Warrington, especially Appleton has some of the most expensive housing in the Borough. No developer will build more than their requisite 30% affordable quota. The first of the three Homes England developments at Pewterspear Green at Stretton, on the outskirts of Appleton is marketing its cheapest property at c£230,000.

While we welcome the mix of housing types proposed for South Warrington, there will have to be radical changes on the rules for affordability so they are based on a percentage of income rather than an arbitrary proportion of market price otherwise we risk all future house building in South Warrington continuing to be only affordable to those with a high disposable income and ability to fund a large mortgage.

Building of new housing in south Warrington will not be able to deliver the scale of affordable housing which would change this unsustainable pattern of development.

Warrington's history of housing delivery is poor, and we believe the Plan will not be able to deliver. There are phasing requirements that could delay housing delivery and are reliant on substantial improvements to infrastructure. Moreover, with nine proposed build sites over a twenty year period - including the three sites (c1000 houses) which will already be in development) operation, the whole of South Warrington will be a permanent building site.

Appleton Parish Council would like to know:

1. What justification is there to extend the life of the Plan from 15 years in 2014 to 20 years in the PSV Local Plan 2019 i.e. 2017-2019?
2. What assurances can WBC offer to guarantee the safeguarding of Green Belt until all brown field options have been exhausted?
3. What justification is there to release Green Belt land when there is no clarity over the housing supply actually needed?
4. How can the untested, inspirational expectations for household and employment growth can be measured against historic deliverability trends?

Transport

The Proposed Submission Version of the LDP (Policy INF1) Sustainable Travel and Transport sets out the following aim:

“To deliver the Council objectives of improving the safety and efficiency of the transport network, tackling congestion and improving air quality, promoting sustainable transport options, reducing the need to travel by private car and encouraging healthy lifestyles...”

Whilst Appleton Parish Council would agree with the laudable aims set out in the Plan, it is clear on close examination that this Plan is based on inspirational hopes for the town and many of the transport aspects of the Plan are unrealistic. The Plan does not present a holistic overview but attempts to address the mistakes of the past by compounding them by continuing to use a 'sticking plaster approach' to solve the traffic and transport issues

that currently consistently bring Warrington and the surrounding motorway network to a gridlock state on a daily basis. The LDP will be detrimental to the town as a whole and will profoundly affect the health and wellbeing of the population of Warrington as a whole. We question the soundness and deliverability of the Plan.

Our objections and observations are in respect of Warrington as a whole and the impact on South Warrington and Appleton/Appleton Thorn in particular, and are as follows:

- Increased domestic and commercial traffic on the current highway infrastructure will be significantly increased i.e. A49 (in particular the Cat and Lion Junction and Stockton Heath Village), the B5356 through Appleton Thorn, A56 (through Walton), A50, Stretton Village, Grappenhall Road, London Road, Lumb Brook Bridge, Wilderspool Causeway and Latchford Village. This will add to the already high levels of pollution, noise and congestion. This is not sustainable.
- Warrington is surrounded by motorways which are currently overstretched and currently affect the local infrastructure. Mitigation to improve this by introducing more SMART motorways will not solve the problem. The whole town currently is affected when there is an accident on the A56, and it brings the town to gridlock on an almost daily basis. High winds on the Thelwall Viaduct can also close the M6. To add a further 7,000 houses and ensuing vehicles together with large new employment areas with hundreds of extra HGV's on the local infrastructure means that this plan is not sustainable.
- The Garden Suburb Southern Strategic Link is described by the PSV documentation as an illustrative link, so its proposed route and connection location at the A49 seems illogical. There is a proposed dual carriageway in certain parts. A dual carriageway is not justifiable from a traffic density need. Only a single carriageway serving domestic residential infrastructure is all that is required and not HGV's going through residential areas to serve employment areas as the LDP seems to imply. This is not sustainable.

In addition, this Link road would undoubtedly attract HGV usage unless strict weight restrictions are applied. This roadway has the potential to be a regular 'Rat Run' from J10 M56 to the potential logistics development at Barleycastle Trading Estate and running straight through the proposed garden suburb. This is not sustainable.

Warrington Borough Council's 'Infrastructure Delivery Plan 2019' shows an estimated cost for this Garden Suburb Southern Strategic Link is £93M, but currently no source of funding has been identified. Is this deliverable?

- The Western link would appear to be grossly underfunded at an estimated cost of £220M, as stated in the 'Councils Infrastructure Delivery Plan 2019'. Is this deliverable?

The Western Link will be heavily used by LGV and HGV's (over 1000 movements per day) servicing Port Warrington with resultant noise and air pollution. It will serve the

commercial activities of Port Warrington but will be a single carriageway road connecting two existing dual carriageways. This is not sustainable.

- The future increase in LGV and HGV traffic movements within the Warrington Network will dramatically increase. The proposed Port Warrington will be adding over a thousand additional HGV vehicle movements daily via the Western Link north to the M62 and south to the M56. The proposed Six/56 Logistics Development and Stobart's potential development in south Warrington will flood Warrington with LGV and HGVs. This will have a severe impact on the local roadway infrastructure, and it will introduce increased levels of vehicle emission pollution, noise and congestion. This is not sustainable.
- The evidence base which underpins Multi-modal Transport Model in LTP4 is not sound.

Appleton Parish Council notes that all of the above points are further compounded by the fact that much of our town's current traffic problems is caused by the Government's broken promises in respect of the tolling the Mersey Bridges in Runcorn. Our traffic and air pollution problems are made significantly worse as HGV's and cars come through Warrington to avoid paying these tolls.

Appleton Parish Council would like to know:

1. What guarantees can WBC offer that no HGV's will be allowed to use the Mass Transit Route cutting through a residential garden suburb?
 2. If the Cat and Lion junction is at capacity, how does the Council expect the junction to cope with vastly increased traffic?
 3. We would like to know how the Borough Council intend to fund the apparent shortfalls in their castings for the Mass Transit Route, the Cantilever replacement route and the Western Link.
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Air Quality

Air quality is a material consideration in planning terms. The NPPF says the planning system should "contribute to enhance the natural and local environment by preventing new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, unacceptable air pollution."

However, the consequences of the LDP will undoubtedly drive air quality down even further for the entire population of Warrington. Today, the quality of the air Warrington residents breathe is at an unacceptable level and implementing the plan will make it worse.

Warrington Borough Council is aware of the poor air quality in Warrington. One reason for the Peel Hall application being rejected by the Inspector was air quality.

The most dangerous air pollutant to human health is PM 2.5. Since they are so small and light, fine particles tend to stay longer in the air than heavier particles. This increases the chances of humans and animals inhaling them into the bodies. Owing to their minute size, particles smaller than 2.5 micrometers can bypass the nose and throat and penetrate deep into the lungs and some may even enter the circulatory system.

Studies have found a close link between exposure to fine particles and premature death from heart and lung disease. Fine particles are also known to trigger or worsen chronic disease such as asthma, heart attack, bronchitis and other respiratory problems.

A highly credible study carried out by researchers from Utrecht University in the Netherlands and various other European institutions and funded by the European Community's Seventh Framework Programme concluded that 'air pollution may be damaging every organ in the body and virtually every cell in the human body'. The study carried out in 22 countries on a population of 376, 521 people, was published in the peer-reviewed medical journal The Lancet.

The study found no strong association between mortality and average annual concentrations of PM10, NO2 and Knox BUT they did find a 7% increase in mortality with each 5 micrograms per cubic metre increase in PM2.5 (particulate matter with a diameter of 2.5 micro-metres) concentration. This link remained even after taking into account various socioeconomic, health and lifestyle factors. The findings are reported to be similar to those of a recent pooling of studies looking at the effect of PM2.5 on death from any cause.

Warrington had the worst rate of small particulate pollution in the UK for the small particulate PM2.5 in 2018.

See the table below:

City or Town	Average Annual PM2.5
Warrington	14µg/m ³
Bristol	13µg/m ³
Stanford-Le-Hope	13µg/m ³
Storrington	13µg/m ³
Swansea	13µg/m ³

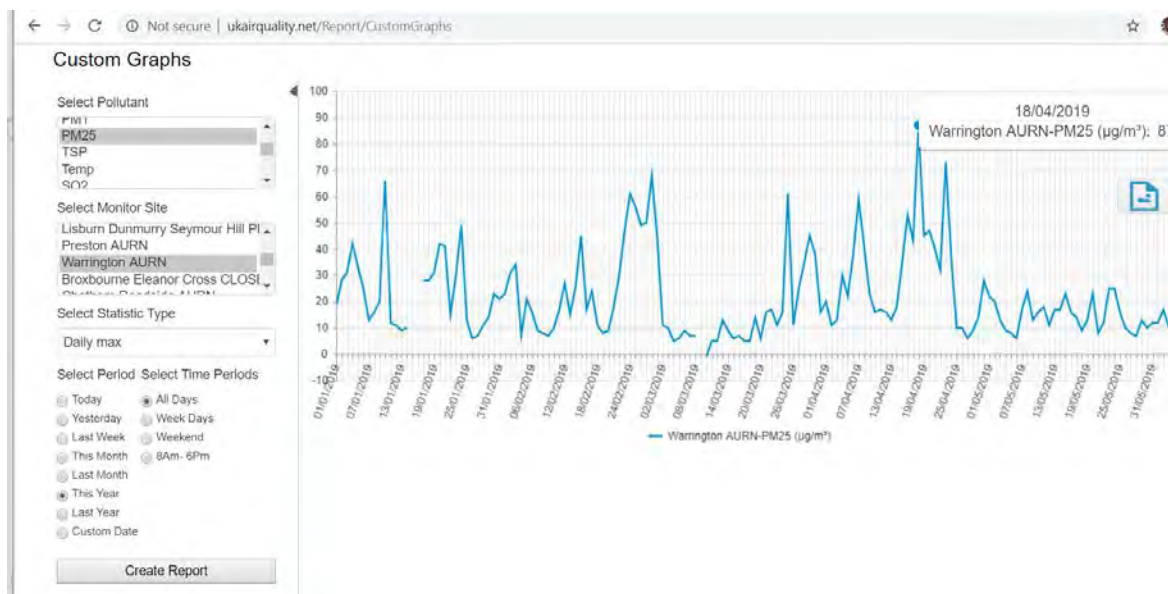
Data taken from WHO Ambient Air Quality Database v11 published on 29th May 2018. British towns and cities drawing or exceeding the WHO limit of 10µg/m³ of pollutant PM2.5. Source: <https://www.comparemymove.com/blog/your-move/worst-air-pollution-cities>

With reference to the Air Quality Action Plan (AQAP) 5.3.2, WBC state:

“Whilst the focus of the AQAP is to reduce NO₂ concentrations within AQMAs, there is strong evidence of the health impacts from PM_{2.5}. Currently there is one urban background monitoring site measuring PM_{2.5} within Warrington. There have been no assessments of any ‘hotspots’ where concentrations could be raised.”.

WBC were aware of the data. In 2016 WBC were named and shamed by the World Health Organisation for breaching safe levels of PM_{2.5}. Since then, nothing has been done, even though PM_{2.5} has been continually monitored.

Looking at recent live data from the Selby Street monitor it is easy to see daily hotspots (between 30 and 85 ug/m³) which are well over the acceptable limits. Using US EPA / WHO Standards, the current limits within the town are regularly at a dangerous level, at times only just below those of the developing world where unrestricted fossil fuels use is prevalent. This graph shows daily maximum readings for 2019, the highest being 87ug/m³.



The network of sampling sites is not comprehensive, and It is noticeable that there are no monitoring sites south of the Manchester Ship Canal. This means that no data has been collected on one of the main arterial routes into Warrington which passes through both residential and commercial areas. The omission, and lack of will, to gather data in and around the M6, A49 and Stockton Heath means that the air quality data provided by Warrington Borough Council is only a 'partial' picture and, therefore, cannot be relied upon to provide a clear overview of the real scale of air pollution in Warrington.

The LDP is predicated upon bringing a further 7,400 houses and associated vehicles, as well as developing large employment areas which by their very nature will bring a significant number additional of HGV's into the town.

The plan for the Western link will mean that there will be more than 1,000 HGV vehicular movements in a 24-hour period. Just as an illustration, the planned Six:56 development has 2, 400 car park spaces. It is estimated that the employment development area, being almost exclusively based on logistics and warehousing, will generate an additional 2,000 vehicular movements *per hour* onto surrounding roads and junctions in what is to become the designated residential Garden Suburb.

The mortality figures quoted in plan relate to 2013 and 2015. Why is it that the plan is using old data when there is up to date evidence giving a more accurate picture? If particulates increase there is a comparable rise in mortality rate which indicates that these two facts cannot be separated. The LDP states that in 2013 4.8% of all mortality in the town was attributable to man-made particulate pollution and is equivalent to 95 premature deaths. One premature death from air pollution is not acceptable. By pushing this economically driven/developer-led plan, is WBC condoning these deaths and saying that 95 premature deaths is acceptable? These deaths were in 2013 before Warrington was named and shamed by the World Health Organisation. Up to date 2019 data shows that WBC is the worst offender in the UK. Air pollution is invisible so often goes unchallenged. WBC has a duty of care to its all of its residents and needs to ask itself if this is too high a price to pay for economic 'progress'. This is an issue for the whole town; a curtain cannot be drawn along the ship canal, the pollution will kill people in north and south Warrington.

Warrington as we know is unique in the fact that it is surrounded by an extensive network of motorways. The 17-point Air Quality Action Plan in no way mitigates the extent of the pollution that will be generated over the next two decades if this plan is passed.

In conclusion, our overriding position on air quality is this: we oppose, in the strongest and possible terms, to an LDP which will massively increase the levels of traffic and HGV's. Our town has already been identified as the worst in the country for small particulate pollution (PM2.5). The overall effect for our residents will be to expose them to a further increase in dangerously high levels of NO2 and PM2.5 with all the ensuing health risks. We will never support an LDP that condemns the residents of Warrington to a future guaranteed to drive up long term morbidity and premature mortality for the price of a few jobs, levels of which are highly contested.

For these reasons, Appleton Parish Council believes the air quality data in the LDP to be unsound.

Appleton Parish Council would like to know:

1. Why the network of sampling sites is not comprehensive?

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2. Why do they not extend south of the Manchester Ship Canal?
 3. Why are levels of the small and very dangerous particulate PM2.5 not being reported, even though it is being monitored?
 4. Why are we building our economy on a logistics industry which directly results in air pollution?
 5. Which health professionals are involved in building a meaningful air quality plan that focuses on protecting our residents? Are they being listened to?
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Infrastructure Delivery

The National Planning Policy Framework (NPPF, 2019) clearly sets out at Paragraph 8 that the delivery of infrastructure is key to the creation of sustainable communities. Paragraph 20 requires that delivery of infrastructure is key to the identification of strategic policies within an LDP

Warrington Borough Council's Infrastructure Delivery Plan states that "For the Garden Suburb, the Council is proposing to facilitate the forward funding of key infrastructure requirements. For the purposes of the LDP Viability Assessment, the Strategic infrastructure cost for residential development has been set at £18,500 per dwelling in the first year of the development."

This figure has been assessed using current estimates for the delivery of infrastructure in accordance with the Infrastructure Delivery Plan, assumed S106 contributions and the cost of advanced funding. Against this, the Council has set an external public sector funding requirement. It should be noted that the funding to meet this requirement has not been confirmed at this stage. The financing to support this enabling infrastructure is the subject of ongoing discussions. The example of primary health provision is just one example of a clear lack of detail and we believe this makes the LDP unsound.

The Infrastructure Delivery Plan states there is to be a new health facility. The cost is yet to be confirmed. Warrington Estates Strategic Plan 2015-2020 published by Warrington Clinical Commissioning Group on behalf of its partners including Warrington Borough Council, NHS England, Warrington and Halton Hospitals NHS Trust provides information on primary health care provision in Warrington.

<https://www.warringtonccg.nhs.uk/Policies%20and%20Strategies%20including%20plans/Warrington%20Strategic%20Estates%20Plan%20-%202008.03.16%20Final.pdf>

Information from the NHS Workforce Survey has been used to obtain average GP list sizes for England and for Warrington as a whole, and provide an indication of the increased likely need for GP services resulting from these potential developments.

Warrington, both overall and at GP cluster level, has substantially fewer GPs per head of population than England. Warrington would need an extra 26 WTE GPs to have comparable list size to the average.

South Cluster

The majority (82%) of patients registered with South Practices live in South Neighbourhood Co-ordination Area (NCA). Most of South Cluster patients live in Lymm (27%), Appleton (18%), Grappenhall & Thelwall (15%), Stockton Heath (11%) and Latchford East (9%). Approximately 7% of South Cluster patients live outside Warrington (mainly in Cheshire East and Cheshire West & Chester local authorities).

The capacity analysis shows that the practices within the South cluster collectively have a surplus of two but in 2030 the practices are likely to be in a deficit of three rooms. The planned HCA sites in the South will comprise of over 1,000 units and considerations will need to be made as to how the capacity deficit will be addressed

South Cluster Analysis	Current	2030
List Size	48,715	53,347
Estimated annual activity	292,290	320,082
Number of clinic rooms required	44	49
Surplus/Deficit clinic rooms	2 surplus rooms	In deficit by 3 rooms

The planned HCA sites in the South will comprise of over 1,000 units and considerations will need to be made as to how the capacity deficit will be addressed.

This has been addressed as the planning application for the Appleton Cross site includes provision for a new health facility and has been costed at £1m with £789, 504 confirmed and with a shortfall of £210, 496 with the provider yet to be confirmed.

However, for the Garden Suburb, the Infrastructure Delivery Plan states that there is to be an (additional) new health facility. Again, the cost has yet to be confirmed. How can this be a sound and plan when funding is not confirmed, and financing is the subject of ongoing discussions?

Warrington's record on infrastructure primary health care provision associated with new development has been unsuccessful. The only example is the proposed Chapelford Health Centre. A proposed new health facility was in the 1997 Masterplan.

Warrington Estates Strategic Plan 2015-2020 states:

Chapelford Primary Care Development

Potential development size: 560m²

Nearest GP: Chapelford Health Centre, Burtonwood Road and Hood Manor, Great Sankey

The provision of primary care in the Chapelford area is already under intense pressure. It has seen an expansion of local housing at a fast pace and the creation of a new urban village which has resulted in many of the surrounding practices becoming full.

Primary Care Services have been provided in Chapelford from temporary portacabin premises for more than 13 years which is of inadequate size for the needs of the surgery and their patients. The premises do not comply with current health and safety or Disability Discrimination Act requirements and there are problems with privacy and confidentiality in the building. It is not possible to extend the premises on the current site and no land is available adjacent. There is no scope for improvement by internal redesigns.

The preferred option is to develop a new primary care building with pharmacy, within the new urban village to enable the delivery of primary medical care services to a registered population up to 6,000 patients by a multidisciplinary team of primary care clinicians and managers.

It is now mid-2019 and there is still no new GP surgery in Chapelford so how can there be any confidence that new health facilities will be built to serve this scale of development in South Warrington.

Appleton Parish Council would like to know:

1. APC would like to know what guarantees the Council will provide to ensure that key infrastructure requirements are in place in the first phase of the life of the Plan.
 2. APC would like guarantees that the funding for providing primary healthcare services will be in place at the beginning of the Plan.
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Economics

Appleton Parish Council is concerned that the approach taken to economic growth is unrealistic. The type of economy we seem to be headed for (logistics and transport) is particularly unsympathetic to the type of community we are. They appear to be led by business interests with direct involvement in land released for development on back of the Needs Assessment.

We are concerned that there have been three different assessments with three different conclusions as to levels of growth produced. Before a development of this scale and nature,

where so much is at stake, we would have expected a clear and easily demonstrable economic plan, predicated on sound economic footings.

Even if such phenomenal growth were possible, it would be reassuring to hear those reasons so we could understand and challenge them in a constructive way. No such opportunity has been offered and we seem to be wading our way through a lot of desk top extrapolations, the starting point of which should be open to challenge.

Growth levels are unrealistic and based on the unsubstantiated ambitions of the Strategic Economic Plan of the LEP and Warrington Means Business. The ambitions are dated and fail to recognise later economic trends. Growth levels are unrealistic and undeliverable based largely on an unpredictable sector of the economy which becomes more digital, mechanised and less dependent on humans every day. It stretches credibility that a highly automated industry is going to employ 4,500 people. In the current economic climate and with uncertainty over Brexit, we think these 'estimates' are over-optimistic and therefore not credible.

We have already seen Stobart's own data that demonstrates that their own workforce is largely based outside the Borough (60% of the workforce). This necessitates extra car journeys to and from site every single shift, even for office-based staff. Given the 24-hour nature of the business, we find it a little far-fetched to believe that these members of staff will either cycle or walk, or even drive to a central location on Warrington to get a shuttle bus to work, especially finishing/starting a night shift.

We believe that the economic argument for the mass destruction of the Green Belt has not been met.

Appleton Parish Council would like to know:

1. Given that the scale of house-building is predicated on the economic growth of the borough, where are the up-to-date, credible plans for economic development that would warrant this type of housing growth?
 2. Given the already overloaded and poorly-performing transport links (M56, Northern Rail), what evidence is there that people will choose to live in south Warrington if there is no major growth in local employment? Which sectors of industry, beyond logistics, are being targeted for local growth?
 3. How credible is it to extrapolate desk-top data and arrive at a highly optimistic employment figure?
 4. How strong is the data in light of a no deal Brexit and a very politically fragile time for the whole of the UK, let alone a town in the North West of England?
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Ecology, loss of habitat and the environment

There is no content anywhere in the LDP that describes how WBC plan to preserve the ecology of, and benefits from, the 1,715 hectares of Green Belt land in and immediately surrounding the Parish of Appleton which will be completely destroyed in the event that the Plan is adopted.

The entirety of ecological assessment in the evidence base section of the LDP amounts to one document, entitled Habitat Regulations Assessment. This single document purports to cover the lifetime of the LDP, i.e. up to 2037. Literally the whole document pertains solely to 7 SSSI's in most of which are not even in the Borough of Warrington, and certainly none near South Warrington.

The following is an excerpt from Policy DC4 - Ecological Network 1.

“The Council will work with partners to protect and where possible secure a net gain for biodiversity across the Plan area. These efforts will be guided by the principles set out in the National Planning Policy Framework and those which underpin the strategic approach to the care and management of the Borough's Green Infrastructure in its widest sense contained in Policy DC3.”

Appleton Parish Council would like to know how a “net gain for biodiversity” will be achieved when virtually ALL of the Green Belt, with all its vast resources and benefits, will be taken for housing and economic activity. Policy DC4 of the LDP states that the only requirement is:

“a site survey carried out by suitably qualified or experienced person to establish the presence, extent and density of these species and identify features of nature and geological conservation importance.”

We feel it is utterly disrespectful to rely on individual site surveys, undertaken by builders with their own agendas, to determine the fate of our Green Belt field by field with no overall plan for the bigger picture.

Appleton Parish Council, being in a semi-rural area, are acutely aware of how important the Green Belt is not just for the local area, but for the whole of Warrington. The Green Belt with its abundance of trees, ancient woodland and farmland provides a vital role in cleaning the air of Warrington.

The Woodland Trust states that *Lumb Brook Valley is a delightful site with several distinctive woodland areas including Fords Rough an area of Ancient Semi Natural Woodland, The Dingle with a mix of conifers, broadleaves and a stand of mature beech trees and Julia's Wood which is a young woodland of native broadleaves. There are good displays of bluebells, wild garlic and other wildflowers in the springtime particularly in Fords Rough*

The Parish Council questions why there is no mention of the Dingle and Fords Rough in the LDP.

It is also of great concern that once the destruction of Green Belt begins at pace, we fear that flooding will be a big issue for the whole town. South Warrington is much further above sea level than the rest of the town. Currently, the vast swathes of Green Belt soak up rainfall

water which drains into the water table and in a sustainable way, moves naturally towards the sea. Once South Warrington is urbanised, there will be no natural way for rainwater to be absorbed. Areas such as Latchford and Moore which are already flood-prone will be even further at risk.

For these reasons, Appleton Parish Council believes what little reference to ecology there is in the LDP to be irrelevant and meaningless.

Appleton Parish Council would like to know:

1. What analysis has been done to assess the environmental impact of the loss of 1,715 hectares of Green Belt in such concentrations?
2. Given that most of the 1,715 hectares are in current agricultural production, what will be the impact on our local economy financially and from a food security point of view?
3. Why has no area-wide Ecological Impact study been and where is the evidence that Natural England has been consulted?
4. What specific studies have been done to ascertain mass loss of habitat for hundreds of protected species: bats, badgers, birds of prey, amphibians, water voles etc?
5. If no other studies have been undertaken due to the scale of the ecological impact, why not?
6. What measures have been taken to mitigate flood risk in the lowest parts of the town?
7. How the “net gain for biodiversity” will be achieved for the Borough if it is not integral to the LDP which takes us up to 2037?
8. How will WBC conserve and enhance the natural environment by halting the decline in biodiversity and helping species adapt to climate change by providing opportunities for movement through ecological networks, as per NPPG guidance, when our entire Green Belt will be taken?

Political Issues

Appleton Parish Council are very concerned about the whole approach to the LDP, its scale and its devastating impact on South Warrington. We have heard unconvincing arguments as to why virtually no development is happening in North Warrington. We read with dismay at the recent WBC consultation event that the development scheduled for Burtonwood had been significantly scaled back to 160 homes, as it was felt the impact on the community was

too great. This is the ward held by the former Council Leader and now a new Deputy Council Leader. There is no comparison in terms of scale to the losses that South Warrington will face: 10, 475 homes in total if we include the 945 already in the system at Appleton Cross, Pewterspear and Grappenhall Heys. It is hard to conclude anything other than the adoption of the LDP by Warrington Councillors was politically motivated. Councillors in the North of the Borough voted overwhelmingly for an LDP in which their own wards would be unaffected. Every Councillor who voted in favour of the LDP was from Warrington North Labour Wards. Every single abstention was a Councillor from a Warrington North Labour Ward where there is a small and contained amount of planned house building. We feel the LDP itself is vindictive.

North Warrington		South Warrington	
Burtonwood	160	Lymm	530
Croft	75	South West Ext.	1600
Culcheth	200	Garden Suburb	7400
Hollins Green	90	Already approved	945
Peel Hall	1200		
Winwick	130		
Total	1855	Total	10, 475

Peel Hall has already been the subject of a Planning Inquiry for development and is a green field not Green Belt site.

Conclusion

Appleton Parish Council strongly objects to the LDP on several issues. We feel that it will disproportionately affect South Warrington residents and will affect our quality of life, health and wellbeing forever. Its effects, if the LDP is adopted, will be irreversible and irredeemable. We are a population of approximately 11,000 people, living in approximately 4,200 dwellings. The proposed scale of building will double Appleton and Appleton Thorn's housing stock. It will take away virtually every piece of Green Belt in our vicinity. It will transform our area into a vast conurbation on a scale never seen before in the Borough.

Having studied the LDP forensically, we surmise that the lives of residents in South Warrington will be transformed negatively and permanently. It is unnecessarily focussed on the destruction of the Green Belt and, given the unsound, flawed and incomplete plans, glosses over the inevitable infrastructure deficit, health issues and misery for South Warrington residents. It is not fit for purpose.
