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I object to Warrington's town plans with the utmost strength.

Warrington has created an unsuitable development plan that suggests a very large area of land is required for business to provide jobs for a growing population. Who in turn need housing, thus justifying the release of an equally massive amount of land for homes in the Greenbelt. The people living in those properties then need jobs, which justifies the rapid rise in need for business properties. It is essentially circular reasoning. It is disguised in a series of highly biased or mistake laden documents that are supposed to justify this massively greedy land grab from the Greenbelt. There are no special circumstances presented to release Greenbelt, especially for business. On the contrary the supporting documents indicate that the demand for business land is opportunistic, ambitious and not based on need for Warrington or the surrounding area. The plans serve business and not the residents or the environment. The plans will add to the town's existing problems of travel, congestion and pollution and don't identify actual solutions or where money is going to come from to pay for any schemes.

The Business Case

Warehousing and Transport

The need for business land is set out in the Economics Development Needs Assessment Update (EDNA) carried out by the BE Group in conjunction with Mickledore. This long document repeats a small amount of information and conclusions in multiple ways but essentially it's an opinion piece by motivated parties. It uses historic take up of land as a starting point. This seems reasonable except the figures include hyper warehousing that super sized the figures. While there was and is a demand for such massive developments a) there is ultimately a finite demand, b) the companies seeking this type of development are opportunist – in other words **if councils will allow companies to build what they want on green field sites at prime locations near motorways, they will** c) there are other neighbouring areas that are making and have made provision for that same demand. The document even lists areas such as St Helens, Middlewich, Manchester and Liverpool but doesn't tally all the areas up to see if there is a genuine shortfall. Strangely the EDNA cites interest from agents and potential occupants as evidence that the land is needed. Wanted maybe but not necessarily needed. We already know that several companies want to build at the Barley Castle Estate but Eddie Stobart have suggested that they have other sites in mind if Warrington doesn't co-operate.

In 2016 the council invited two expert companies to submit business growth models for the town, Oxford Economics and Cambridge Econometrics. The latter giving the lower figure.

Table 35 – Jobs Growth Projections, Forecast Period

	2016-2037
Oxford Economics	19,700
Cambridge Econometrics	18,300

Source: Oxford Economics, Cambridge Econometrics, 2015 and 2016

The updated EDNA did not return to Cambridge Econometrics (because it was lower?) but asked for a second model from Oxford Economics in light of Brexit, Warrington not getting an HS2 station and other influencing factors.

Table 28 – Jobs Growth Projections, Forecast Period

	2017-2037
Oxford Economics 2016 forecast	18,400
Oxford Economics 2018 forecast	12,700

Source: Oxford Economics, 2016 and 2018

The growth rate is over a slightly different timeframe but the average yearly value dropped for the 2016 and 2017 start points, suggesting **growth was already slower for 2016/17 than Oxford Economics predicted in 2016, by 380 jobs.**

Most noticeably it dropped its adjusted 2016 estimate from **18,400 to 12,700 jobs.** A massive contraction and one there seems to be no concern about. It's a **fall of between 30% or 35% of jobs growth** depending upon which 2016 starting point is used. That should be a red flag!

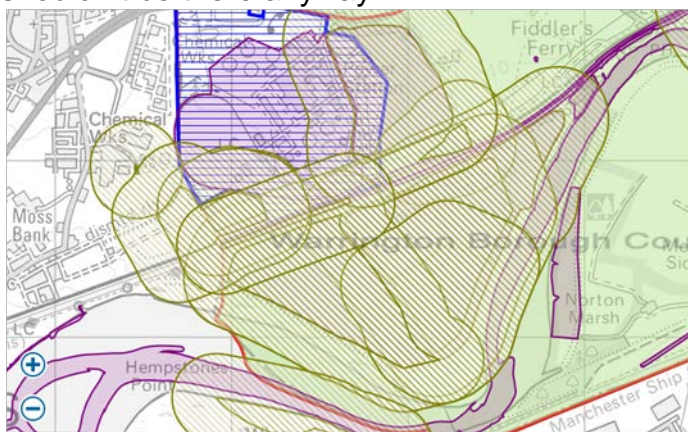
However these figures were rejected as not being 'Policy On', which means they didn't assess plans for the area like the Liverpool Super Port and Parkside in St Helens which would increase demand for warehousing and transport hubs. There's no evidence offered that Oxford Economics didn't consider local developments. The EDNA document not only **admits that those Policy On areas can address their own need for warehousing** (page 99 "In principle, there is **enough brownfield land within the [Liverpool Port] City Region to meet these requirements**" and page 104 "The 144 ha Parkside development is a joint venture proposal from Langtree and St Helens Council on land mostly west of the M6, south east of Newton-Le-Willows. It is by far the largest logistics led proposal in the City Region") but that there are other towns/cities that are eagerly making land available for similar developments. Several of the areas have land on Brownfield sites, including St Helens which boasts a strategic freight rail interchange. **Much more suitable than Greenbelt, greenfield land at the south of Warrington with no rail links.** The EDNA repeatedly talks about competing for the warehousing demand with Warrington's neighbours. Eg page 99 "to capture some of this strategic growth potential" page 104 "will likely be the most significant competitor to future logistics schemes." Page 106 "Cheshire East, Ma6nitide (formerly Midpoint 18) has some potential to compete with Omega." If Warrington was still in need of redevelopment it would justify competing for any job opportunities but the town should be concentrating on attracting high end employment that would suit its housing and population mix, especially that planned for the south of the town. Potentially Warrington might see some Policy On driver of jobs of its own but apart from Port Warrington which is already catered for

warehouse wise, the EDNA doesn't mention any major new Warrington venture that will drive a need for large tracts of land. So in conclusion, 'Policy On' is just ambition to capture market share from other councils, not a measured plan to develop the town sustainably or co-operate with neighbouring councils.

The Policy On doesn't make any provision for economic upsets like Brexit or a recession, let alone some major change like Peel Ports scaling back. Port Warrington doesn't seem to be the primary plan on Peel Ports books and might be the first to be shelved in a downturn. The EDNA reads more like a sales brochure than an unbiased assessment. While there are possibilities where Brexit might boost British ports, there are other warnings that indicate the opposite. Warrington must guard against partially started developments that then languish as building sites or empty units, waiting for an occupier. It must not encourage land banking, either as farmland or developed properties. The EDNA warns on page 134 "Will the decline in jobs lead to the release of land? As noted previously, experience suggests that even where businesses are contracting, they will continue to hold onto sites in anticipation of future improvement and change." This needs to be strongly discouraged and may be exacerbated by too rapid release of land from the Greenbelt as developers will want to put the land beyond return to farming. It stops those wanting land of their own offering a higher price. Why bid for old land if there is undeveloped land available? Warrington actively targets unoccupied domestic properties, it must do the same for business developments.

The EDNA notes that companies are clamouring for freehold sites page 54 "Any freehold units that become available are regarded like 'gold dust'". Most people and businesses prefer freehold if they can get it but it makes it easier for companies to sit on land, without using it if there is a downturn. The scarcity doesn't mean that companies don't have less favourable choices available. Warrington even damages its own rental market by releasing land that is likely to go to owner occupiers.

The EDNA doesn't identify that Warrington has large Brownfield sites that are in the Greenbelt. It mentions Fiddlers Ferry but doesn't suggest that the polluted lands to the south and east be proactively removed from Greenbelt, especially as they shouldn't be there anyway.



Despite there being many indicators, the EDNA report didn't identify that the site will close March 2020, sooner than 2025 when it had to shut under current legislation anyway. The owners SSE have already shut one of the four units and wanted to shut the rest 2 years ago. It was persuaded to continue generating by the issuing of

pretends? Or is there a plan to release those areas later as being unsuitable Greenbelt? A case of having your cake and eating it.

The EDNA makes repeated comments about the demand for sites at the south of Warrington for business development and treats those demands as a need instead of companies shopping around for the best sites or deals they can achieve. The whole planning system was devised to stop developers building wherever they wanted to. **Warrington's plan turns that on its head and is actively courting developers with the choicest areas to build. It turns those demands into evidence that Warrington has to release the land.** There is a strong hint in the EDNA that once released from Greenbelt for housing, the business demand may override the housing plan and development will creep along the M56 to the Stretton junction and north along the M6. The submission of planning applications from Eddie Stobart and Langtree indicate that even Greenbelt designation hasn't curbed predatory behaviour by interested parties. **Without protection, the land will be very vulnerable but the report even argues that business land should be protected from house building!** (Page 21, 27 **protecting key Employment Areas from further losses to housing**) The EDNA does recognise on page 140 that **The revised NPPF amends national planning policy in several ways, notably introducing a 'presumption in favour of sustainable development' for both plan making and decision making. For employment however, a core aspect of NPPF policy remains fundamentally unchanged, the need to avoid long term protection of sites/properties not deliverable for B-Class use whilst, conversely, strengthening protection of key employment sites/areas.** But then ignores it because once out of the Greenbelt, sites can be portioned off for warehousing as and when it's needed. Other, less useful sites, can then be handed over for domestic or retail, as a sop to the town's other needs. In other words **Big business gets the prime sites, smaller businesses next, then retail, housing and finally wildlife and farming.** That's not a dispassionate assessment of the balance between people, business and the environment. **It certainly has nothing to do with sustainability.**

The EDNA claims that business land has already been diverted for home building and retail although those areas are not suitable for the kind of development the report recommends. It suggests that this **reassignment has created a shortage that must be made up by new provision and so adds an extra 14.71 ha** to the inflated figures. Not satisfied with that, the BE Group recommends that the **plan adds a 5 year 'buffer' to the 20 year plan.** It also admits that it made similar recommendations to other councils or that they already had the same policy eg St Helens. **So not only can those 'Policy On' areas fulfil their own needs for the next 20 years, they have a 5 year buffer** and may also be intending to compete for development from other areas, thus **any, as yet unannounced Policy On needs for more business land, may already be accounted for over the next 25 years, even without new Brownfield sites like Fiddler's Ferry coming available.**

This all comes to a grand total that leaves a shortfall once the existing development land is subtracted (I assume that figure is accurate but given the rest of these calculations, perhaps that's not wise). **Of course the highest figure is recommended,** leaving a 'need' for 277.8ha. A large chunk of that, about 163ha (total area of the site, including Six:56) will be at the Barleycastle Estate. And yes there are already developers keen to carve the area up and build, especially as some of those

companies own the land or have first refusal – a preference over rented properties that the EDNA identified. This leaves existing properties empty around Warrington. There are 17.15 ha on the first ten entries on Rightmove's business letting section for Warrington alone (sorted by size on 31st May 2019). **On the first two pages of entries for a 10 mile radius round Warrington there are 168ha of empty warehousing, light industrial and distribution space. That doesn't extend as far as M6 or the far sides of Manchester or Liverpool.**

One of the arguments for the approval of the huge tranche of business land is that Warrington needs new employment opportunities. Not in itself unreasonable but the jobs offered will be relatively small in number (eg proposed 480 staff at the Eddie Stobart development and 4100 (early estimate) for Six:56) in relation to the area of land released from greenbelt. Including a small amount of landscaping (not comparable with natural features) the total area for Stobart's is about **157,748m²** which works out at **328.6 m² per person**. Six:56 is **813,733m²** which works out at **198.5m² per person**. Possibly not an unusual figures for logistics businesses but a lot of land for any single job. The usual figure quoted is 70m² but that only includes the building floor space and not the roadways, parking and other structures. The operation won't even benefit the neighbourhood in a secondary way because there isn't a close shopping area where staff might frequent.

The EDNA waves away the argument that many of these jobs in logistics that Warrington has recently pursued are likely to be replaced by automation in the near future. It observes on page 152 **'Where jobs are being lost to automation, those new automated processes will still require land on which to operate and can lead to higher productivity and growth'**. In other words, many of these jobs may not exist by the time the plan has run its course but the land will be changed forever and people will be seeking other employment. Page 129 **Warrington is planning to put 21.2% of all employment into distribution, transport and storage**. A serious potential for unemployment in a number of outcomes. Excluding the massive developments at Omega the last 5 years have only seen an average of 1.26 ha of new warehousing take up and the last 3 years saw less than 0.5ha per year. This suggests a low diversity of jobs. **Another 7.2% will be in construction which might suffer a simultaneous downturn.**

Offices and Other Businesses

The 2016 EDNA and the 2018 update have estimated growth figures for different employment sectors. Below the two report tables linked together with the 2018 Oxford Economics figures on the right. The bulk of the change from the two reports is of less growth although manufacturing is expected to contract.

Table 36 – Employment Change by Employee Numbers 2016-2037

Sector	Oxford Economics	Cambridge Econometrics	Oxford Economics*
Agriculture, etc.	(100)	(100)	(100)
Mining and quarrying	0	0	-
Manufacturing	(1,900)	(2,900)	(2,200)
Electricity, gas and water	(500)	300	(500)
Construction	3,300	700	2,200
Distribution	2,000	1,700	1,000
Transport and storage	600	800	(100)
Accommodation and food services	1,200	3,500	900
Information and communications	1,200	700	500
Financial and business services	11,100	10,400	9,300
Government services	800	2,600	600
Other services	2,000	800	1,100
			12,700

Source: Oxford Economics, Cambridge Econometrics, 2015 and 2016
 *Figures in brackets are negative, i.e. jobs/property/land losses.

Most significant is the flattening of growth in the services sectors. These estimates may be in response to the impact of Brexit or a recession but might also reflect that services may be impacted by automation.

Table 36 – Proportions of Warrington Employment – Oxford Economics Forecast 2037

Sector	Percent
Agriculture, etc.	0.2
Mining and quarrying	0.0
Manufacturing	3.7
Electricity, gas and water	1.4
Construction	7.2
Distribution	14.0
Transport and storage	7.2
Accommodation and food services	6.6
Information and communications	4.1
Financial and business services	33.3
Government services	17.4
Other services	4.9

Source: Oxford Economics, 2018

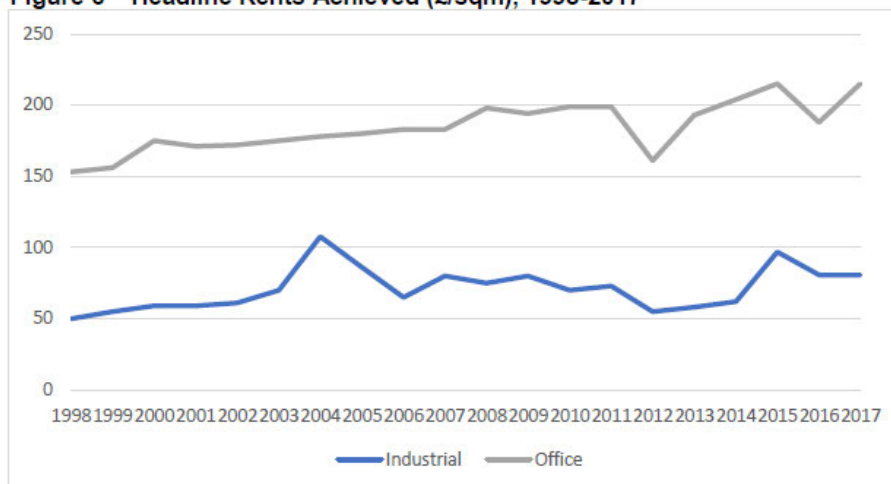
If the services sector is significantly impacted by economic events such as Brexit it would have serious implications for Warrington but automation could also be an important issue. A recent Price Waterhouse Cooper report considered the banking services sector vulnerable to a 30% risk to jobs by automation. To be overtaken by Transport which could be reduced 50% by 2035. Warrington is at risk from its lack of diversity. Something the plans do little to resolve.

The nature of Warrington’s Office demand reflects the town’s flat structure. Unlike a normal city, Warrington is very low rise. It has spread outward rather than gone up, as if there was no limit to supply. The EDNA notes on page 2 “There is healthy local office market demand in Birchwood and Gemini, and, more modestly, for Town Centre stock, particularly at Centre Park.” In other words, those seeking offices can pick and choose the choicest locations with leafy surrounds, car parks and easy access to motorways and employees who travel by car rather than public transport. A quick look at Rightmove Commercial offers a significant number of 2 storey offices to let in the town. This demonstrates a total lack of sustainability. If Warrington needs a lot of business land for offices it’s because it has wasted large tracts of land already and seems to have no intention of rectifying this behaviour. Also on Page 2

“The strongest competition in the office market is from Manchester (and Salford) and this is **inhibiting demand** for larger office premises at present.” Warrington is clearly not as attractive as it pretends. It doesn’t have the mix of business and entertainment that real cities combine. **Warrington should be making more of the town centre – building up for both flats and offices. Alternatively it should be building flats to make use of the rail network for those who commute to Manchester, Liverpool, Chester or beyond.** However the EDNA isn’t positive towards this idea, pushing Birchwood instead Page 22 “Stakeholders supported further growth here [Birchwood] and wished to discourage provision of a major new office centre elsewhere in the Borough that would compete with and dilute Birchwood’s offer” Again suggesting that Warrington doesn’t have that much demand. Likewise “there is a strong ongoing demand for industrial/warehouse space, including strategic options, along with more modest office needs.” Suggests that demand for services (that need offices not warehousing) is currently weak.

The EDNA gives a summary of rents achieved for both industrial and office. The report suggests on page 41 there has been steady growth for office rents (“Across the whole 20-year period the average annual growth rate was **2.0 percent**”), which on the face of it, is true, but **when inflation average of 2.7% (according to the Bank of England) is factored in there is a decline in rent in real terms.** The picture is slightly better for industrial properties “The average annual growth rate over this period, for industrial headline rents, was **3.1 percent**” but this probably reflects the prized nature of the massive warehouses and the low value of other units.

Figure 6 – Headline Rents Achieved (£/sqm), 1998-2017



Source: BE Group, 2018

So overall, **Warrington’s business property situation isn’t one that is soaring away and any boom is driven by being extremely generous to businesses, offering them perfect sites, modest rents, good parking, access to the motorways and a willingness to allow unsustainably massive premises. The EDNA spins that as a positive.**

Warrington has followed a policy of large boulevards, verges, bushes and car parks around low rise business developments. While attractive, this has resulted in very poor land use. **Warrington must stop developing as if there was no shortage of land.** Office blocks need to start going up, not out. Car parks need to be smaller and/or multi storey. Shared car parks should also be considered. Where land is owned,

planning permission must include sharing with other businesses if the owner cannot guarantee full occupancy and efficient use of the space.

Warrington the City

Warrington's ambitions to be a city are doomed to failure under the current prospectus. Many businesses and properties on the outskirts do not turn a town into a city, no matter how many people arrive. Warrington has little to recommend it. It came dead last out of 325 places in the Royal Society of Arts' 2016 Heritage Index. The top 10 attractions are the town hall gates, the town hall, the Alice in Wonderland Tea Party statue and the River of Light. That's not 10 items but that's all that were listed.

It has a satellite campus for the University of Chester but the subjects offered there aren't top tier like STEM subjects but are instead arts, media, sports, nursing and policing based. Very useful but not the subjects for another Silicon Valley, Oxford or Cambridge. The campus isn't even part of the town centre so students won't automatically use the facilities or consider moving there after qualifying. The town centre library teeters on the edge of closure on a regular basis. The media quarter is forgettable. The new attractions are ok but not must see. There are bigger, better versions on the outskirts of the town and in the surrounding cities.

Warrington should be concentrating on the city centre and high value business development. It should be creating spaces for the qualified young to buy their first flat and spend their time in town. Instead the plans seem to be turning Warrington into a glorified lorry park.

Warrington's town centre has a mixed level of success for retail within the centre. The original Time Square development was only built in the 1980s but was the poor relation to the Golden Square. It remains to be seen if the new Time Square draws in more people or just shifts the focus from Golden Square. However the real competition comes from the many out of town retail developments as illustrated by M&S deciding to close its central shop. **The NPPF, stresses that development shouldn't marginalize the original town centre. A new suburb in the south will be yet another lure away from the town proper. The town centre will be a periphery to those who live there.**

Warrington does not operate like the city its councillors want it to be. The town has very little evening business. Its shops shut because nobody is there to use them. Those that might attract business are dotted about and unattractive because of the lack of people around, particularly for women. For a period of time Warrington became a student drinking venue. Success for all the wrong reasons and the drunken crowds acted to drive away other custom. Poor layout means that areas like Hatters Row are starved of customers and subsequently rental income. Busy roads cut through areas of accommodation and commerce. The outer town is laid out for the car and the centre isn't good enough to change how people behave.

Key locations – such as the land opposite Central station are low level car parks and are waiting development. These areas should have been redeveloped into flats and/or offices ages ago. That They haven't been, suggests a lack of demand.

Housing

The Adopted 2014 Warrington Town Plan was well reasoned and passed through the Planning Inspectorate which thought that the NPPF was being adhered to. It suggested a building rate for properties of 607dpa. While this was successfully appealed in the courts, there was **a likelihood that it might have passed a second round if the amount of properties was fully justified**. Warrington subsequently threw that figure out of the window and supersized every aspect of the plan such that it plans 1039 properties. **I've already demonstrated that the business growth potential is based on bad planning practice but the population growth is equally distorted**. There has been a subsequent drive by the government to build more than historical demand (driven by price, salaries and interest by the public), especially to improve affordability. 'Affordable' being a figure of the median property price being 4 times the median salary. The median house price September 2018 was £180,000 and the median salary was £28,497 giving an affordability index value of 6.32 – high but within the third to a quarter most affordable towns/cities in the UK. **To be affordable Warrington needs the median property price to be £113,988**. Warrington's plans are not about delivering affordability because there will be **very few, if any properties at or below £113,988 in the out of town developments** it wants. The properties planned for **the Garden Suburb will in fact increase Warrington's affordability problem. Thus justifying building more and more!**

Warrington's plans cynically use the shortage of properties for the young, the NPPF and the Government's drive for more housing – to build luxury houses. It rightfully indicates that the Government calculation asks for more than the number of houses historically built but then goes **well beyond what is being asked**. The government White Paper outlining how councils should calculate housing based on affordability. Under that calculation Warrington would be required to produce 870 dpa but since the 2014 plan was fully adopted there was opportunity to add a cap bringing the figure down to 850 dpa. Over subsequent years that figure might fall further. The council claimed that the original plan was not adopted, despite the plan front page stating **"Adopted July 2014"** This caused the government to require Warrington to deliver 909 dpa. **One of the demands of the planning rules indicate that plans should be deliverable**. Warrington has never delivered more than 500 homes per year, let alone the higher figure the plan demands and when developers can't get the price they want, they stop building. This was exactly what happened after the 2009 crash. While Warrington's house prices have continued to rise, according to **Plumplot the rate has steadily fallen below that of the national average and adjusted for inflation, the average price has been falling since 2007. This is another indicator that Warrington isn't as attractive as the Council are claiming**. Only rises in price on the south of the town have bucked the trend but the Garden Suburb and business parks may put an end to that. It's possible that prices will stagnate and developers will stop building. Defeating the whole reason for the plan.

Another reason why Warrington's house building might suddenly slow is that **currently 91.4% of all the town's new builds are part financed by 'Help to buy' but this**

ends in 2023 but starting in 2021 it will be available only to first-time buyers and a cap on properties over £224,400 for the town.

Warrington argues that its plans for business will encourage many more workers to the town, setting aside the flaws in that plan, **the salaries of those workers are not in keeping with the homes it is planning in the same locations**. The town's average detached property sells for £388,000 and even semis sell for £205,000. Flats average £162,000 and terraced properties at £145,000. The south of the town is consistently more expensive than the north. The average salary suggested for Six:56 employees is £28,000, almost £500 lower than the town median. This suggests that few workers at the new business zone will live in the direct area. **Already Warrington has a mismatch of homes and workers, causing significant movements in and out of the town every working day. The plans will exacerbate this – contrary to the requirements of the NPPF and plans to reduce pollution and CO2 emissions.**

Transport, Traffic and Pollution.

While Warrington has created a **transport plan (LPT4) it is so lacking in detail that it is essentially worthless**. It vaguely lists things Warrington might do and cites other places that have those schemes but it doesn't identify what it will do and why. It accepts that Warrington has a traffic problem which is **exacerbated by the mismatch between where workers live and where they work** but none of the plans are sufficient to solve this. Indeed, they will almost certainly make them worse. There are numerous pinch points around and through the town, mostly impacted by geographical obstacles like the river Mersey, the Manchester Ship Canal, the Bridgewater Canal, existing railway lines and haphazard previous development. At rush hour there are additional obstructions caused by traffic, including the M6, M56 and M62 plus a number of road junctions eg Bridgefoot. Accidents and high winds on the Thelwall viaduct risk gridlock now. Both the Croft and Lymm interchange experience significant jams in the morning and evening.

The **LPT4 doesn't consider the effects of the Policy On plans including the likelihood that the 3 swing bridges on the MSC are expected to be opened far more often than they are now**. At the moment the town traffic filters over a weight limited high level bridge and the plans vaguely suggest another to run along side but with no idea where it will start from or go to. Access to the existing bridge causes hold ups at rush hour, even without HGVs using the route.

The plans do suggest link roads (all the way from the M56 Stretton junction to the A50) through the proposed Garden Suburb but **mostly seem to be intended to ease the flow of a much increased logistics traffic to and from the Barley Castle estate and not help inhabitants get into town more easily**. The scale of this suggests high speeds and heavy use. **Totally unsuitable close to an area intended for housing and schools. It increases both pollution and accident risk.**

On the 2017 proposed plan, there was an idea to create a link road into the centre using the route of the TPT but this has been excluded, not because there are no plans but because there is a possibility that the same route could be used for HS3 or NPR. In every other town, councillors are demanding a tunnel for high speed rail but

Warrington is happy to allow a high level train devastate its residents. **Keeping these plans secret is clearly an attempt to reduce objections from the many areas affected and is contrary to true consultation. It would impact those on both sides of the river and on the west side of town where the route would have to emerge from Warrington Bank Quay.** While the plans require decisions from Network Rail and the government, it indicates that the plans are totally premature. Alternative routes north, south and through the town are equally intrusive and deserve proper consultation.

As an adjunct to the rail line that the plan doesn't speak of, the plan talks about possible bus or tram routes with terminuses at many of the potential sites for a new Warrington station. The LPT4 doesn't identify if the existing bus companies would comply with these plans or where additional monies would come from to pay them. Indeed a lot of the plans **require co-operation from commercial bodies, who may have no incentive to do so.** The Garden Suburb is likely to be inhabited by those who will commute to Manchester, Liverpool and Chester, using private vehicles. The workers at the Barley Castle estate are likely to travel from the north of the town and other towns on the other side of the river by car. All adding to the traffic on the Thelwall viaduct or the town's roads. Bus travel would tend to involve a change at some location and be subject to the traffic congestion the south already experiences leading to long commute times. People will prefer to use private transport and the plans all reflect that, while at the same time issuing the right noises about green policies. **The sprawling nature of Warrington is not conducive to mass transit and the Garden Suburb design is no different.**

There are the obligatory ideas about **cycling routes but no assessment of whether the residents would use them in any serious fashion.** Other suggested ideas about **congestion charging or a Work Place Parking Levy are totally lacking in detail** on how they might be implemented or what the issues might be. Regardless, these plans will have no reduction impact on the amount of traffic and pollution caused by the motorways. **On the contrary they will add to it significantly with more HGVs and commuters. It also puts more families and three schools in locations to be exposed with some of the most polluted air in the country.** The new roads will also **put children at risk from rapidly moving traffic,** including dividing them from schools and shops.

There is much more that could be written about the LPT4 but **I'll just endorse the Rethinking South Warrington Forum response.** For such a massive plan to build homes and businesses the **plans produced by the town are disturbingly vague.** It smacks of either amateurism or motivated intent to obscure.