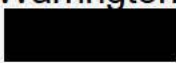


Warrington



7th June 2019

Dear Sir

As a resident of Warrington, I wish to submit my fears and concerns in respect of the PSV Local Plan 2019.

There is no justification for the predicted growth in housing need as the planned number of 945 per year over a 20 year period is over-ambitious and in excess of government housing targets. James Brokenshire, Secretary of State for Housing, Communities and Local Government categorically stated the following in a letter to Cllr 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."

The Council has never been able to fulfil much smaller housing targets and, if this is not a target set by the government as Warrington Borough Council states, why is the Council determined to push through with a completely unnecessary and undeliverable Local Plan which is not sound?

The PSV Local Plan 4.1.5 states that the Garden Suburb will have a 'minimum capacity of 6,490 homes of which a minimum of 4,201 homes will be delivered in the Plan period'....the South West Extension will have a 'minimum capacity of 1,631 homes. House prices in the south of Warrington are above the national average and the types of houses that will be built are unlikely to provide the 'affordable housing' needed.

Warrington Borough Council are required to demonstrate a five year land supply for houses. The Warrington Local Plan Core Strategy 2014 is still in place and this was a 15 year plan. The PSV is now a 20 year plan taking us to 2037 and during this time frame we are likely to see major changes such a Brexit, the phasing out of diesel and petrol engines, changes to transportation policies, changes in power sources

and revised forecasts for population growth. All of these factors are likely to have an impact on Warrington and tying the town to a twenty year plan gives the Borough Council less flexibility to react and adapt to these changes. This puts in doubt the economic justification for such a large scale expansion of the town.

The use of employment land in South Warrington is not backed up by any meaningful economic strategy. It is based mostly on warehousing operations and it is unlikely that they will provide significant employment to local residents in South Warrington as many employees will travel from other parts of Warrington and other North West towns. In fact the current 6/56 planning application has provision for 2,400 car parking spaces. This number of additional cars will be another burden on the road infrastructure and that is without the considerable number of HGV movements in every 24 hour period. This employment land will be located next to motorways but away from rail connections. The site at Fiddlers Ferry (a brown field site) which is likely to become available in 5 years time would fulfil this need and reduce the need to take employment land from the Green Belt. Fiddler's Ferry has the potential to help Warrington fulfil some of its economic and housing aims; this not even mentioned in the Plan.

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

Much of the Green Belt land at risk was re-categorised in 2016 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. Developers prefer to build on Green Belt land rather than Brownfield. Once green, open spaces and recreational

spaces are lost, they are lost forever. This report is based on evidence which appears to have been manipulated to facilitate overly ambitious and undeliverable targets.

Appleton Thorn will lose its rural setting and distinctive, historical village character as it will be encroached on by three new villages, effectively joining Appleton and Grappenhall with Appleton Thorn. The combined impact on Appleton Thorn of this together with major employment areas of Stobarts and the Six Fifty Six will change the area from rural to urban.

Appleton Thorn has already been significantly impacted by new developments both in the village and around it. Appleton Thorn's NDP (adopted in June 2017) which currently carries weight in the Warrington Local Plan Core Strategy 2014 does not appear to be adequately reflected in this proposed Plan. 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.

In the 2014 Adopted Core Plan Strategy it is stated that "The continued protection of the Green Belt has ensured that settlements .. have not encroached onto open countryside." and "Walton Hall Estate is a quality local and sub-regional visitor destination making the most of its countryside location and value as a heritage asset." It valued the cultural and historic contribution Walton Village makes to life in Warrington. The introduction of 1,600 new houses on Green Belt, with additional cars and air pollution will significantly affect this unique village. The "special circumstances" to "preserve the setting and special character of historic towns" are NOT met in respect of Appleton Thorn and Walton village and the Plan is enabling the destruction of the character of these two unique villages.

The loss of these particular areas of Green Belt will not only affect local residents but all residents in Warrington. . If, indeed, Green Belt does need to be used then there needs to be a more equitable spread across the town.

The following criteria to protect Green Belt are are being completely ignored in this Plan in respect of Walton and Moore:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another
- c) to assist in safeguarding the countryside from encroachment

The boundary between Walton and Moore will, on the Runcorn Road, only be a few hundred yards. This, together with a similar impact on Appleton Thorn village, demonstrates that the Plan does not meet the criteria for 'special circumstances'. Instead it encourages "an unrestricted sprawl of large built up areas", encourages "neighbouring towns (Warrington and Runcorn) to merge into one another and it does not assist in safeguarding the countryside from encroachment"

The criteria to demonstrate 'special circumstances' to release Green Belt land is NOT met here and the PSV positively encourages urbanisation. It does NOT "safeguard the countryside from encroachment"

Air Quality is a material consideration in planning policy and 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.

Warrington is named as one of the top 5 cities/towns with the worst pollution in the country. 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>

Warrington Borough Council is aware of the poor air quality and yet seems to be in a state of denial insisting that building more roads and encouraging greater numbers of HGVs into and around the town will be solved by encouraging residents to 'leave the car at home once a week' and walk or cycle. There are ambitious plans in LTP4 but again are they deliverable or sustainable?

It should be noted that one reason for the Peel Hall application being rejected by the Inspector was air quality. In 2017 Cllr Judith Guthrie (Executive Board Member for Environment and Public Protection) was asked whether or not air quality in Warrington was a particular cause for concern and her reply was that most areas of Warrington did meet standards.

She said: "The vast majority of the town complies with the current air quality standards – we are not complacent and we know that, in common with most other towns and cities, air pollution levels can be high within a few metres of busy roads."

Health and Wellbeing is a common theme running through all Warrington Borough Council's policies. Cllr Maureen McLaughlin, (Executive Board member for Public Health and Wellbeing) has stated that "**Warrington Borough Council** takes its responsibility for the health and wellbeing of its residents extremely seriously and "We remain determined to tackle the causes of ill health in the borough and that includes air pollution – to this end we have a comprehensive network of sampling sites which form part of a national monitoring programme."

However, to counter-balance their assertion that Warrington complies with 'the current air quality standards', I would argue that the data Warrington Borough Council is working from is partial, incomplete and not sound. It is contradicted by the evidence in the WHO Ambient Air Quality Database v11 published on 29th May 2018 (see the table above)

The network of sampling sites is not comprehensive. It is selective. The Air Quality Action Plan 5.3.2 states that there is currently one urban background monitoring site in Warrington and there have been no assessments

The Air Quality Action Plan 5.3.2 states that there has been 'no assessment of any hot spots where concentrations could be raised'. '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.'

Stockton Heath is a case in point. It is one of the most heavily congested areas in the town with the A49 running through it and it also has the Swing Bridge which when closed means that cars are idling for

some time. To make up for this lack of assessment Stockton Heath Parish Council is now in the process of buying its own air quality monitor. There are no air quality monitoring sites south of the Manchester Ship Canal which clearly demonstrates a lack of will by Warrington Borough Council to take this issue as seriously as it should.

According to the PSV in 2013 ,4.8% of all mortality in the town could be attributed to man-made particulate pollution. That equated to 95 premature deaths. More up to date surveys carried out by the World Health Organisation in 2018 show that air pollution in Warrington is higher than most towns in the country. One premature death from air pollution is not acceptable and ,yet by implementing a Local Plan that is economically driven/developer lead plan. Is WBC condoning these deaths? Air pollution is invisible so we cannot see what it is doing to the population. WBC needs to ask itself if this is too high a price to pay for economic 'progress'. This is not Warrington Borough Council taking 'its responsibility for the health and residents extremely seriously.

Another point of some significance which has gone very much under the radar is that according to an article by Mark Piesing dated 4th January 2018 on inews.co.uk, cargo ships are also the world's biggest polluters. Admittedly the cargo ships passing along the Manchester Ship Canal are moving at low speeds so their emissions will be less than when oceangoing but the planned expansion of Peel Port, with increased shipping movements will undoubtedly add to the pollution of Warrington's air.

A major contribution towards Warrington's economic success are the motorways which encircle it. Accidents and gridlock occur on them every day, contributing to the traffic congestion in the town. But , apparently, we must forget the unseen effect of this congestion. It seems clear to me that the Borough Council has not grappled with the potential long-term effects of invisible air pollution on our residents. I would caution the Borough Council to be mindful of the recent case where the little girl in London, Ella Kissi-Debrah appears to have died from causes relating to air pollution and a new inquest is looking into recording her death as 'death by air pollution'. Do we want this for our residents?

The 17 points of the Air Quality Action Plan will in no way mitigate the extent of the pollution that will be generated over the next two decades if this plan is passed in its current form; the Plan is, inherently, unsound.

The National Planning Policy Framework (NPPF, 2019), Paragraphs 8 and 20, states that the delivery of infrastructure is key to the creation of sustainable communities and that delivery of infrastructure is key to the identification of strategic policies within a local plan. The Plan is vague in so far as it doesn't show how the infrastructure for its aims and ambitions are to be funded.

A case in point is the Appleton Cross site which includes provision for a new health facility. This has been costed at £1m with £789,504 confirmed. There is a shortfall of £210,496 and the provider has yet to be confirmed. It is a similar scenario with the Garden Suburb Infrastructure Deliver Plan where costs are still unknown.

In the past Warrington has had a poor record in delivering primary health care for new developments. Another case in point is Chapelford where primary care services have been provided in a portacabin for 13 years. Years after the commencement of this development there is still no new GP service and the service is under strain.

How confident can the people of South Warrington feel that this Plan will deliver the health facilities necessary to service such a huge increase in population in South Warrington? There is no mention in the Plan of a new hospital which will be necessary to look after this vastly increased population.

From what history tells us Warrington Borough Council will not be able to deliver the health infrastructure needed in the beginning phases of the Plan and the increased population compounding an already over-stretched health service in South Warrington.

I have the same concerns for educational provision within the south of Warrington. To build a plan around ongoing discussions and vague costings demonstrate that this Plan is inherently unsound.

Is it realistic to build houses without the infrastructure being in place?

I acknowledge that an attempt has been made to have a more holistic view of Warrington by consulting on LTP4 at the same time as the Local Plan. However, whilst attempting to link with the Local Plan it is only a conceptual and aspirational plan which lacks detail in terms of costing and also has some serious fundamental flaws. It heavily relies on a modal shift from the car to walking and cycling. There are still 'indicative' lines drawn on maps which show no clear connectivity and go through

residential areas i.e. The Garden Suburb Strategic Link which is referred to as an 'enhanced contingency'. It appears to run from the A49 through the Garden Suburb, linking up at the B5356 (by the Langtree 6/56 employment area) and through to the A50. This 'indicative' line appears to show a 40m wide dual carriageway. HGV's through residential areas?

The Plan's housing strategy places a major emphasis upon creating two major residential settlements - the Garden Suburb and Walton which are both South of the three waterways. In complete contrast the LPT4 openly admits that the preponderance of workplaces, such as Lingley Mere, Omega, Town Centre, Railway Stations, Gemini/Winwick Road Retail Park, Woolston Grange and Birchwood Science Park are North of the Three Waterways. This mismatch is wholly illogical, and is a recipe for growing and increasing intractable highway congestion.

The Western Link would appear to be grossly underfunded so it is deliverable?

The Western Link will be heavily used by HGV's (over 1000 movements per day) servicing Port Warrington resulting significantly increased noise, air pollution and traffic congestion. It is proposed that the Western Link is a single carriageway road connecting two existing dual carriageway. The increase in HGV traffic from the M56 along the A56 Chester Road would significantly impact on Walton Village and would also result in severe bottle necks at both ends of the carriageway.

An allowance of £55m has been set aside for the replacement high level cantilever bridge [which is assumed to be based upon a similar weight restricted bridge]. The Western link high level crossing of the Manchester Ship Canal is much more substantial and will be carrying HGVs is only costed at £24.4m. Does this make sense?

The Borough Council's asset management in respect of maintaining the current roads in Warrington is already under strain. Will it be able to deliver and sustain all this infrastructure?

To conclude, there is no sound justification for predicted levels of growth. As a result, there is no justifiable need for the number of houses or the growth in employment areas that this Plan puts forward for the south of Warrington. Consequently, there is no need for the scale of Green Belt release. Furthermore, there is no need for development which will result in an unacceptable level of harm to the air quality and

the environment. It will adversely affect the health and well-being of our residents. The development put forward in the Plan will destroy the character and distinctiveness of Warrington. In addition, there is no certainty of the means of delivery and this, in itself, makes the Plan undeliverable and unsound. I accept that a Local Plan is necessary to effectively manage growth but this growth must be realistic and achievable. We need the right number of houses, in the right places simultaneously with the right infrastructure. The proposals put forward are not sustainable or in line with national policy.

I reserve the right to speak when the PSV Local Plan is heard by the Secretary of State.

Yours faithfully

Cllr Sharon Harris


Chair, Appleton Parish Council
Borough Councillor for Appleton, Hatton, Stretton and Higher Walton