



15th June 2019

Warrington Borough Council,
New Town House,
Buttermarket Street,
Warrington,
Cheshire, WA1 2NH

Re: The Warrington PSV Local Plan

Dear Sir/Madam,

I am writing in response to the PSV Local Plan consultation.

After a careful review of all documentation provided by Warrington Borough Council, I wish to register my objection to the PSV Local Plan.

I object to PSV LP, which is wholly unsound on a number of grounds. The grounds for objection are detailed below.

The PSV LP is not fit for purpose and should be withdrawn for the following reasons:

It is **unsound** in its employment growth predictions, which are vastly overoptimistic and do not accord with local or national long term trends.

It is **unsound** in its housing need predictions, which are approximately double that arrived at by central government and based on vastly overoptimistic economic and population growth predictions.

It is **unsound** in terms of the sustainable transport element and comes nowhere near meeting the requirements of the National Planning Framework

It is **unsound** environmentally, driving up car and HGV traffic volumes with the concomitant decrease in air quality and increase in carbon footprint.

It is **unsound** because it would lead to an increase in negative health outcomes for a large proportion of its residents.

It is **unsound** because it is completely ignoring the views and wishes of it's own residents.

It is **unsound** because (particularly in the case of the PWP2), it flouts its duty to *protect* the local environment and *enhance* biodiversity.

In detail, the reasons for my objection are as follows:

Overview

In the Local Plan documents, it is WBCs stated aim to minimise the boroughs contribution to global warming and climate change. None of the provisions of the LP achieve this goal. Building thousands of (large high priced) homes over Green Belt land merely increases environmental impact, both in the short term during the construction phase and in the long term.

The growth figures used to support the LP are very much higher than those of the government and the ONS. Although the term "Warrington New City" has largely disappeared, it is clear that this is still the end goal for many in WBC. As a driver of expansion it bears no relation to reality in terms of population growth or employment growth. It takes no account of the uncertainty created by Brexit.

With most homes having two cars, the South Warrington part of the LP would bring another 20,000 vehicles onto Warrington's roads. The resulting rise in emissions and Oslo effect particulate pollution flies in the face of WBCs very own stated Core Principles since it would be damaging to the environment, damaging to the Green Belt and damaging to the health and wellbeing of its own residents.

This would result in huge increases in vehicle derived pollution, which WBC publicly admits, causes health issues for a large number of its residents and in some cases early death. Indeed, air quality levels in some areas are so low that WBC has been publicly admonished by the World Health Organisation. Neither the LP nor the LTP4 do anything to properly address this issue.

Employment and Housing

The majority of job growth would come from the Warehouse/Distribution sector. The number of these jobs is limited due to increased automation and over time the some of these new jobs would be lost as a result. Warehouse based jobs bring in around £16,600pa so even a married with a married warehouse operative with a combined income of £40,000 could only raise a £190,000 mortgage. This would put South Warrington (Greenbelt) housing beyond the pocket of most of the new workers.

So, who would purchase these properties? Where would the higher income residents come from and where will they work? They would obviously have to commute, most likely by car, thus generating a yet greater carbon footprint.

Brown Field Sites

In its submission material, WBC claims to have looked thoroughly at all brown field sites and rules some out on the grounds of cost - how much is too much and as defined by whom? The Government has declared a climate emergency and therefore the council should view the slightly raised development costs through the lens of the huge costs due to unchecked climate change. In the spirit of transparency, WBC should provide a comprehensive list of all the brown field sites together with its analysis of each one.

Fiddler's Ferry

The power station site gets a brief mention in the LP documentation and is effectively dismissed since at the time there was no set date for site availability. It also stated that it would be considered for commercial development and housing was not mentioned. However, there was a hard end point of 2025, so WBC could easily have factored this land into the equation.

SSE have now committed to a closure date of March 31st 2020 which means that this large and important site should be included in the plan. Whilst WBC may regard this land as unsuitable for residential purposes, it should follow the example of Cannock Chase and Lichfield District

Councils. They are forward looking and bold enough to redevelop the site of Rugeley Power Station for both housing and commercial use including the provision of a school and local amenities.

Like Fiddlers Ferry, this was a coal fired power station with all the same potential issues and yet it has been found to be viable. To ensure a green and safe future for the next generations, the use of Fiddlers Ferry is essential. The precedent has now been set.

Port Warrington

Whilst on the subject of employment and transport plans, we must closely scrutinise the Port Warrington expansion plans, key to which is the construction of the Western Link. The reason is simple and hinges upon the (quite deliberately chosen) crossing position and route proposed - it allows for a new feeder road to run between what is currently Moore Nature Reserve and the A56. Whilst the reason for the new crossing is ostensibly to provide congestion relief for Bridgefoot, the main driver is Peel Ports, since their grand plan for PW Phase 2 rests almost entirely on the ability of WBC to deliver a suitable HGV access route.

Port Warrington Phase 2 would cover the 200 acre Nature Reserve site. Warehousing and distribution on a site of this size would require around 1000 HGV movements per day. With it comes a massive increase in particulate pollution, some from emissions and a large quantity from road surface and tyre wear, known as the Olso Effect. All HGV traffic is to be routed south over the new bridge, thus bringing the added pollution to Walton and Stockton Heath residents.

This venture would entail a large increase the ships sailing along the Manchester Ship Canal. PWP2 would need a large number of container ships berthing at Port Warrington to service it. When in port, these ships burn about 65 gallons per hour of heavy fuel oil. This type of fuel, produces very large quantities of SO₂ and NO_x when burned. The most dangerous component of emissions is PM_{2.5} average and these boats pump out 1.2kg a day just sitting at the dock.

These are the emissions from the auxiliary engines, but once the main engines are started and those figures rise by about 15 times, meaning 100g PM_{2.5} every 8 minutes. Whilst 100g of PM_{2.5} may not sound much, one must bear in mind that lung tissue is damaged by exposures as small as 50ng, which is 0.00000005g. Ultra-fine particles are a causal factor in Alzheimer's disease and cancer. Now add this to the HGV derived particulate pollution and we have a sizeable problem, bringing with numerous health problems ranging from asthma and cancer to dementia.

The WHO report on health risks associated with particulate matter found that there is a 6% increase in mortality for only a 10µg/m³ increase in PM_{2.5} particles. That's a lot of ill health and unnecessary deaths for a few warehouse jobs...

Growth Forecasts

WBC estimate an extra 20,000 people will be employed within the borough over the plan period. These numbers are way in excess of the national average and also way above the preceding trends for the area.

The forecast for housing is also vastly inflated, with WBC estimating over 900 houses per year, whilst central government predicts around 500 houses per year. Even the ONS population growth figures have been revised down by 24%.

Warrington has a habit of over-estimation: the Department for Business, Energy and Industrial Strategy estimates that the Cheshire and Warrington LEP Local Growth Fund should generate 12,000 new jobs, 5,000 new homes and £280 million in private leverage. The LEP, led by the WBC contingent, on the other hand believes that it can deliver 24,000 new jobs and 12,000 new homes. I have no idea how this can be justified.

Environment

The government is committed to reach zero emissions by 2050 and yet the LP coupled with the exceptionally weak transport policy, positively encourages car use. The plan drives huge increases in HGVs using the area and permanently destroys thousands of acres CO₂ absorbing land, replacing it with CO₂ emitting housing. So much for a zero carbon future!

Warrington Waterfront has a massive carbon footprint and destroys one of the best nature reserves in the UK. Moore Nature Reserve has the most diverse range of rare and endangered species in the North West, including the Great Crested Newt, many species of bat, red and amber listed birds and a wide variety of rare and endangered invertebrates. There is the offer of a mitigation scheme involving the creation of a country park and an "equivalent" nature area. This is a sop since it would be utterly impossible to re-create this habitat, which is dune slack plus ancient woodland. It would be impossible for the developers to round up all the threatened wildlife, thus all of the plants, birds, mammals and invertebrates would be lost for good - those creatures not mobile enough to escape (ie. the majority) would be killed by the buckets of the diggers.

Peel Ports can't even keep their promise to maintain the swing bridges, so what are the chances of them holding up a promise of mitigation regarding the Moore Nature Reserve? Peel have a very long history of making and then breaking promises and WBC have no leverage. So much for increasing biodiversity.....

In the core planning documents, WBC trumpets its green credentials and its involvement in maintaining and enhancing the Mersey Nature Corridor. The Port Warrington development flies in the face of all of the councils stated environmental goals and should be shelved immediately.

In summary.

WBC needs to start thinking differently. Build up not out and provide an example for others to follow. Renewable power and green space can work vertically as well as horizontally. Why is WBC still wedded to the construction of thousands of new, standard build houses all over green fields? This just adds to our carbon footprint rather than helping to reduce it. WBC should withdraw the current LP and only come back when it has produced some sensible, environmentally positive plans.

I hereby submit that for all the reasons detailed above, I find the Warrington PSV Local Plan to be unsound and call for it's withdrawal.

Yours sincerely,

Sharon Saberi