

# Response 456

## Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

## PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: Andrew Saunders

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

Contact details	
Organisation name (if applicable)	[REDACTED]
Agent name (if applicable)	[REDACTED]
Address 1	[REDACTED]
Address 2	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

None of the above

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant		X
Sound		X
Compliant with the Duty to Co-operate		X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

I've attached details. An example would be that the Statement of Community Involvement states that Stockton Heath Library is a deposit location to view material. It is closed until after the consultation period ends. I also don't think the method of assessments e.g. for air quality and green belt are correct and again I've provided details in the attached. The mapping within the Plan is particularly poor with no locations provided on any of the mapping so the reader cannot work out what the land use policies relate to

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Review of Green Belt Method and Assessment is needed.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each). If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'. If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Warrington Local and Transport Plans Objection.docx - [Download](#)

**Comments/file description**

Local and Transport Plan objection letter

You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)

## LOCAL PLAN / TRANSPORT PLAN OBJECTIONS

I would like to object to the draft Local Plan and Transport Plan presented by Warrington Borough Council for the following reasons:

- Legality – lack of evidence that the local plan has achieved legal compliance including not meeting a Statement of Community Involvement undertakings
- Impact on Green Belt including the robustness of the method and assessment
- Timing and Cumulative Effects – as applications for very large developments are being submitted prior to the outcome of the respective plans being determined and if the cumulation of effects has been properly assessed
- Lack of details on infrastructure required e.g. links to the proposed high-level overbridge across Fairfield Road
- Air Quality and Traffic Impacts affecting the worst polluted “city” in the UK
- Biodiversity – ability to meet Government biodiversity targets
- Adequacy of Consultation – including poorly presented / inaccessible material and lack of information
- Housing Predictions and Phasing

My main objection relates to the loss of the Green Belt and valuable open space to the south east of Warrington. It is a vital green lung for those who live in Warrington. Walking in the area, visiting Grappenhall and Appleton Thorn historic villages and associated pubs, enjoying the network of paths, lanes and towpaths away from major settlements and the motorway network. All these quality of life indicators would be severely eroded with the proposed developments in this area. I believe the consultation has not been legal, there are weaknesses in the assessments and Green Belt should be taken as a last resort.

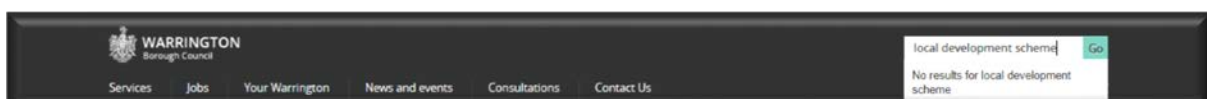
### Legality

At the Halliwell Jones Stadium exhibition for the Local and Transport Plans the Council stated that for the Local Plan to be legal the following must apply:



For a consultee to test the legality of the plan and provide a representation the sources of information would be expected to be on the website or at the exhibitions.

- **Local plan must be included in our local development scheme** – a search for local development scheme on Warrington Borough Council’s website revealed no results (see extract)



- **Meet our statement of community involvement** – again, a search for statement of community involvement revealed no results (see extract).



Notwithstanding, I have managed to get hold of a copy of the SCI and the first thing I did was to check where I could view hard copies of the material. The SCI stated that Stockton Heath Library was a deposit location.

## Appendix B - Deposit Venues - Addresses and Opening Times

Library	Opening Times
Stockton Heath library	Monday: 9.30am - 1.00pm & 2.00pm - 5.00pm
Alexandra Park	Tuesday: 9.30am - 1.00pm & 2.00pm - 7.00pm
Stockton Heath	Wednesday: Closed
Warrington	Thursday: 9.30am - 1.00pm & 2.00pm - 7.00pm Friday: 9.30am - 1.00pm & 2.00pm - 5.00pm Saturday: 9.30am - 1.00pm

On Thursday 6<sup>th</sup> June I therefore left work early and went to Stockton Heath Library. It was closed and will not reopen until after the consultation has closed. **The Statement of Community Involvement requirements have not been met.**





- **Comply with the Town and Country Planning Regulations** – the Town and Country Planning Regulations include the requirement to make documents available for inspection – as set out above there were no hard copies available at events such as at the Halliwell Jones stadium and the venue I visited above listed in the Statement of Community Involvement is closed until after the consultation ends so documents could not be inspected at the venues or readily found on the website. How can those being consulted be assured that legal compliance has therefore been achieved? I've raised other points about adequacy of consultation and compliance with the Regulations below.
- **Be supported by a sustainability appraisal report** – this is provided but within the document each policy is not set out in full rather only the title of the policy is provided. The reader doesn't know what the sustainability credentials are being tested against e.g. the extracts below provide the title but not the actual wording of the policy. Is this acceptable?

9.11.31 **DC5 Open space, Outdoor Sport and Recreational facilities:** Whilst open space and recreational facilities can provide areas of open space within townscapes, the focus is upon recreation, and this might not necessarily contribute positively to the character of the built environment.

9.11.32 **DC6 Quality of Place:** this policy is likely to have a positive effect on the historic environment. The standards outlined in the policy should encourage high quality design that is considerate of local character and distinctiveness. Requirements for the use of materials that respect the local context and the established character of the locality should ensure new developments complement the townscape, are in-keeping with the character of conservation areas (in particular those in outer settlements due to their distinctiveness such as Lyme and Walton), and heritage assets and their settings.

In addition, some of the findings of the assessment appear dubious – this extract for example scores the policy in relation to Green Belt positively when the Plan has a significant adverse effect on Green Belt. But we don't know what the policy wording is?

Green Belt Policy

Policies	GB1	Overall Significance
Broad Implications	↑	+

9.2.9 This policy will prevent housing development in the Green Belt. However, this should not prevent the achievement of housing targets. Not least because the policy also allows for land to be removed from Green Belt to meet the housing needs of the population of Warrington. For example, on Warrington Waterfront, the Garden Suburb and smaller inset settlements. Consequently, on balance, **minor positive effects** are predicted overall.

I would therefore suggest that the Council's box ticking exercise was premature and that an Inspector should satisfy themselves that legal compliance has been achieved. Given the difficulty in obtaining a copy of the Statement of Community Involvement and the fact that the first requirement I tested (i.e. to view it at a stated deposit location) was not met I would request that compliance with the Statement is carefully scrutinised and tested by the Inspector. If the Statement committed to providing unclear messages, disingenuous plans / mapping, ill-reasoned land allocations based on dubious methods of assessment (e.g. for assessing Green Belt value) then they will have complied, but I suspect this is not the case.

In summary it has been very difficult to work out the effects that the proposals would have on areas due to the availability and poor quality of material presented. The Planning Inspectorate provides

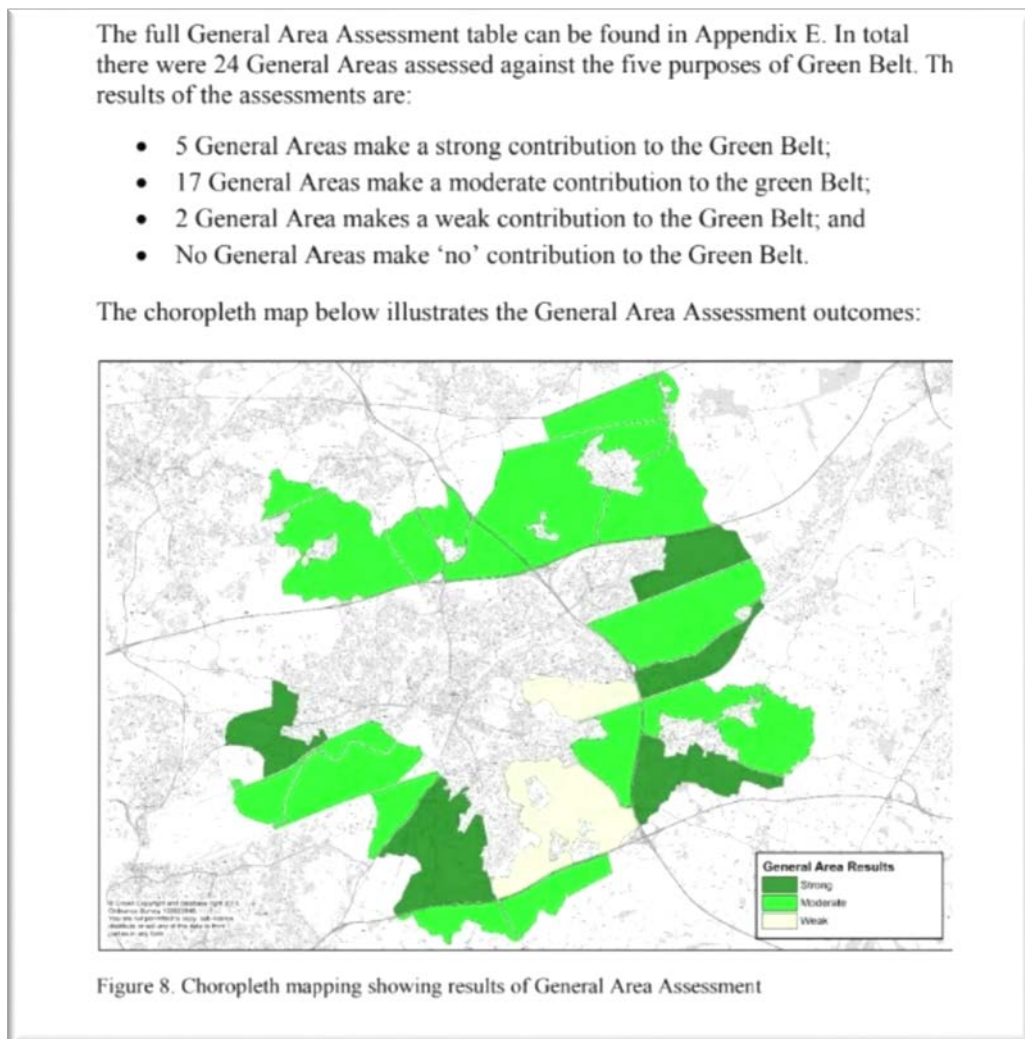
advice on how to present material – I suggest the Council adhere to these guidelines for future applications- <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/05/Advice-note-6-version-71.pdf>

## Green Belt

The Plan for taking 600 acres of Green Belt is not justified. Very Special circumstances do not exist. These are required for Green Belt to be released.

There is no recognised method for testing Green Belt. The method selected seems to have taken leaps of faith at certain points to arrive at the conclusion that Green Belt in south east Warrington performs poorly compared with other areas. I would like the method to be carefully scrutinised by an Inspector. Full confidence is required that the assessment is robust and fit for purpose.

The conclusions resulting from the assessment have a significant impact on a large amount of people and the highly valued recreational resources that support those living both north and south of the Manchester Ship Canal. Irrespective of the method selected the following extract visually presents how important the areas identified by the Council as supposedly making a weak contribution to the Green Belt are in terms of separating settlements and maintaining openness.



Effectively the proposals deprive a large population of access to the countryside which is within walking or cycling distance. Instead development leads to the loss of all countryside up to the A50 and M56 – I would liken it to kettling a population. All openness is lost.

Has the Green Belt assessment been undertaken correctly and is it correct that the two areas identified as performing poorly are indeed the most poorly performing? I would ask the Inspector to revisit the assessment method and outcomes and consider that it fails to:

- Check unrestricted sprawl
- Safeguard the countryside
- Preserve the setting and special characteristics of historic settlements
- Assist urban regeneration.

It feels extremely unfair that one area of Warrington suffers most of the impact based on a weak method of assessing Green Belt.

### **Timing of Applications and Cumulative Effects**

Is it correct / fair that planning applications for major developments (Stobart and Six 56) have been submitted before the local plan is ratified? In addition, have the cumulative effects of these developments been taken into account for all proposals including the local / transport plans (e.g. traffic from all developments, air and noise pollution, loss of biodiversity, loss of landscape features, flood risk, impacts on cultural heritage features)?

As stated at the outset the Council has to comply with the Town and Country Planning Regulations. This includes the Environmental Impact Assessment Regulations 2017 where projects must include an assessment of alternatives studied, the main reasons for discounting them including environmental effects and cumulative effects within Environmental Statements. Have the applications made to date fully considered the implications of the Council's Local Plans. In other words, are they legally compliant?

With so many planned developments people are suffering consultation fatigue and confusion not understanding how huge developments can be in for planning before the local plan is being determined but I am also sure that with major applications and the Local Plan and Transport Plan all out for consultation most people would object to all of them if they could but would find it difficult to do so given different dates, different information to understand and the effort it takes to object to even a single development.

### **Infrastructure**

There is significant uncertainty about how the additional traffic will be accommodated given that the current road infrastructure is inadequate (including swing bridges which break down and will be used more often as ship canal traffic increases) and the plans presented do not give detail of how this will be addressed. For example, how would connections be made to the proposed crossing over Fairfield Road at the current Cantilever high-level bridge – how can people comment on proposal that aren't presented? Has a Cost Benefit Analysis been undertaken to quantify the money lost to the economy through journey time increases associated with the Local Plan? The extract below from the Local Transport Plan consultation provides little information – **is an undertaking to carry out more work post adoption sufficient given how significant this link is to the success of the Local Plan? Can the Transport and Local Plan be considered sound on this basis?**

A new funding source is needed to fund the capital cost of building the mass transit network and provide revenue support for services.

**What is planned for the High Level Cantilever Bridge Crossing?**

Through the Draft Local Plan (Proposed Submission Version) we are proposing to continue to safeguard land adjacent to the existing Cantilever High Level Bridge located between Station Road in Latchford and Ackers Road in Stockton Heath. This is because the existing bridge, which is already subject to a weight limit, is likely to require upgrade or replacement in the future, and keeping this land free from further development ensures that the land we might need for this continues to be vacant or is not developed further.

We will be undertaking study work after the adoption of LTP4 to better understand what the requirements are and consider options for any future scheme.

Another policy (INF1) includes protection for all

**MOTORISTS faced long delays after Stockton Heath swing bridge broke down this evening, Tuesday.**

The bridge, which crosses the Manchester Ship Canal on London Road, resulted in tonight's **planning meeting** over proposals for 770 homes in south Warrington being delayed for 15 minutes.

The structure has broken down numerous times in recent years.

**Air Quality and Traffic**

Increased traffic will also exacerbate air quality issues. The air quality assessment assumes that increased traffic will be offset by reduced emissions from the vehicle fleet. However, air quality has continued to deteriorate due to the composition of traffic changing over time with more SUVs for example contributing to worsening air quality in contrast to the predicted future fleet composition. Reality is therefore not matching predictions which renders the future predictions questionable.

The Local Plan Air Quality Modelling Report states the following:

6.2 Current air quality in Warrington is fairly typical of urban areas throughout the UK. The pollutant of most concern in Warrington, in terms of national and European targets, is NO<sub>2</sub>. The main contributor to poor air quality in Warrington is road vehicles, and consequently the problem areas are near to the busier and more congested roads in the borough. Further set back from roads, air quality tends to be much better. This is reflected by the designated Air Quality Management Areas.

However, Warrington is not "fairly typical". It is the worst place in the UK for air pollution.

<https://www.comparemymove.com/blog/your-move/worst-air-pollution-cities>



### The Worst 5 British Cities for Air Pollution

Warrington tops the WHO report for the worst air in the UK. With concentrations of PM2.5 hitting 14 µg/m<sup>3</sup>, the Cheshire town tops the North West and the UK for worst annual PM2.5 pollution levels. This is above the WHO recommended limits of 10 µg/m<sup>3</sup>, and is well above the UK annual average of 9.6 µg/m<sup>3</sup>. This will be directly linked to high amounts of traffic within the town centre at peak times across the year.

Next up with annual concentrations of 13 µg/m<sup>3</sup> are Bristol, Stansford-Le-Hope, Storrington and Swansea. It's worth noting that all of these cities have higher concentration of PM2.5 pollutants than even London (12µg/m<sup>3</sup>), a city infamous for its history of smog. Major road networks and busy city centres will be to blame for the high pollution levels, but it's clear that

It is also worth noting how different the model is to the monitored situation albeit I appreciate a verification factor has been applied but every monitored level is significantly greater than that modelled as the following extract reveals. Is the modelling and the model used therefore robust?

**Table 6: Summary of NO<sub>2</sub> Verification**

Site ID	Measured Total NO <sub>2</sub> Concentration (µg/m <sup>3</sup> )	Measured Road NO <sub>x</sub> Contribution (µg/m <sup>3</sup> )	Modelled Road NO <sub>x</sub> Contribution(µg/m <sup>3</sup> )	Road NO <sub>x</sub> Factor
CM2	47.0	65.6	26.8	2.4449
CM3	34.0	40.8	32.6	1.2513
DT7	55.7	89.2	25.1	3.5558
DT9	49.5	72.1	31.5	2.2875
DT10	39.4	46.9	11.6	4.0312
DT11	42.7	52.0	32.6	1.5935
DT12	37.5	39.7	28.4	1.3978
DT13	49.9	70.2	32.3	2.1701
DT14	40.3	46.3	16.1	2.8652
DT15	42.3	58.9	12.5	4.6957
DT16	40.6	55.1	11.3	4.8659
DT17	36.8	49.7	11.3	4.4115
DT18	46.8	65.1	15.8	4.1266
DT19	39.2	46.4	16.8	2.7587
DT20	38.4	51.0	24.7	2.0657
DT21	40.9	57.0	26.9	2.1224
DT22	38.7	45.3	11.9	3.7985
DT23	40.4	54.2	17.6	3.0741
DT24	48.5	74.6	18.5	4.0387

In ten years there is barely any improvement in PM2.5 levels in the worst polluted place in the UK with exceedences still predicted at may houses. Is this acceptable? I am aware of schemes being stopped due to exceedences of standards even when there is a net overall improvement. Here there

is a very little overall improvement. Added with model uncertainty and the failure to include the motorways in the model it could be even worse than presented.

#### 1.15.2 Model domain

5.4 The model domain was determined based on the outcome of the screening study. The domain included the town AQMA, and additional areas identified during screening as of being at risk of NO<sub>2</sub> exceedance. The motorway AQMA was excluded from the detailed study, due in part to the very small number of receptors close to or within the AQMA.

The following extract shows how little is predicted to change over ten years with exceedance of standards forecast to continue with little change predicted over time.

**Table 12: Roads with predicted exceedances of PM<sub>2.5</sub> WHO guideline in 2026**

Street/ Road	Approx. no. receptors	Street/ Road	Approx. no. receptors
Baxter Street	6	Manchester Road	4
Chester Road	13	Manley Gardens	9
Chiltern Place	2	Mersey Street	3
Church Street	10	Newton Road	10
Elm Road	7	Parker Street	21
Folly Lane	1	Sandy Lane West	1
Golborne Road	2	St. Peters Way	3
Gough Avenue	1	Toll Bar Road	18
Green Street	4	Victoria Street	6
Kingsway South	4	White Street	1
Knutsford Road	3	Whitecross Road	1
Liverpool Road	1	Wilderspool Causeway	21
Long Lane	2	Wilson Patten St	1
Lovely Lane	17	Winwick Road	25

**Table 13: Roads with predicted exceedances of PM<sub>2.5</sub> WHO guideline in 2036**

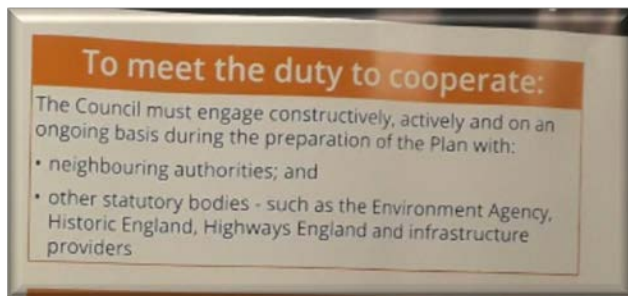
Street/ Road	Approx. no. receptors	Street/ Road	Approx. no. receptors
Baxter Street	5	Manchester Road	2
Chester Road	8	Manley Gardens	9
Chiltern Place	2	Mersey Street	3
Church Street	3	Newton Road	10
Elm Road	7	Parker Street	6
Folly Lane	0	Sandy Lane West	0
Golborne Road	2	St. Peters Way	1
Gough Avenue	0	Toll Bar Road	18
Green Street	4	Victoria Street	6
Kingsway South	2	White Street	0
Knutsford Road	2	Whitecross Road	1
Liverpool Road	1	Wilderspool Causeway	21
Long Lane	2	Wilson Patten St	1
Lovely Lane	13	Winwick Road	25

In addition, the Air Quality Report has used modelled address points, rather than at the receptor façade, **this could therefore underestimate concentrations at locations in close proximity to the road**, and they could potentially underestimate the number of properties exceeding the objective. It is also unclear on how the traffic data for the future years has been derived.

Could the Inspector therefore make sure that traffic data and air quality modelling has been undertaken correctly considering this is such a critical issue.

## Biodiversity

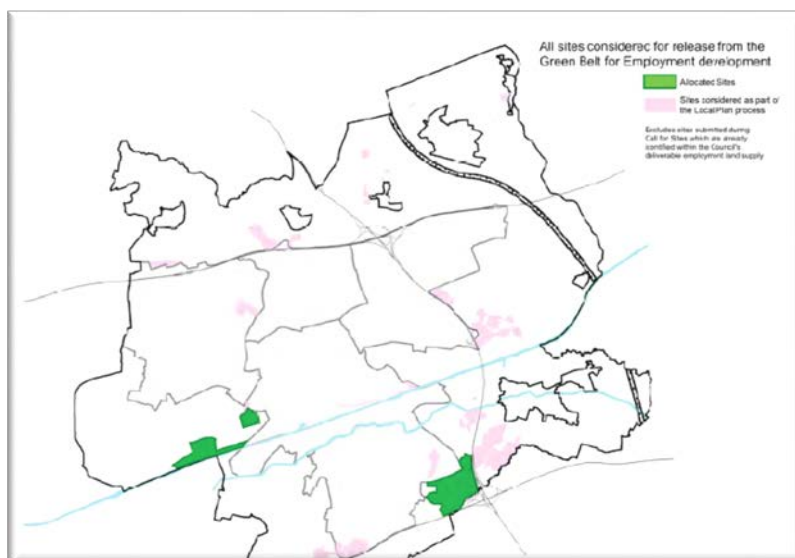
Will the proposals result in no net loss or even a net gain for biodiversity as required by Government Policy? I would ask the Inspector to satisfy themselves that the current biodiversity of the area can be bettered with the proposals. It is interesting that the display board at the exhibition failed to mention Natural England as a statutory body. Why was this?



## Consultation

I commented on the initial Local Plan (PDO) consultation to the extent that the material was unreadable and therefore inadequate. I gave no further feedback as I consider that insufficient information was provided to allow comment. I had hopes that the second round of consultation would be improved given the amount of people who had obviously had trouble understanding / accessing the material previously. My hopes were misplaced.

I have never seen such poorly presented plans for transport and local plan consultations. Poor mapping, no north points or scales, no labelling of settlements and roads, colours on the key plans not matching the colours on the plans, unreadable base mapping. Often it was only by recognising the “square box” motorway network that the reader could start to determine where settlements were. At consultation events I heard so many people complaining about not being able to work out where the proposals were in relation to the settlements that they couldn’t appreciate the impact it was having on them and their environment. Here is an example plan from an exhibition board.



I am also not sure that all of the information presented at the exhibitions were available on the Council website. **I would be grateful if it could be confirmed that all material at the exhibitions is on the website.**

It is also worth noting that surprisingly few people seem to be aware of the Local Plan, particularly those I have spoken to in Appleton who are the most affected. Most planning applications are accompanied by signs in the vicinity of the planning application. It is only by walking around local lanes and spotting Homes England signs that you are aware that fields may be due for development.

No events have been held south of the Manchester Ship Canal – is this reasonable given the significant long-term effects on people in that area?

In addition, there were a lot of complaints on social media about downloading documents, missing documents and the website including the response questionnaires not working effectively.

Has it accorded with the Statement of Community Involvement? I don't know – it is not available on the website or for inspection at the Halliwell Jones Stadium event. The Inspector needs to see evidence that the SCI has been complied with. I have set out above how I have been unable to view the material as Stockton Heath Library, which is defined as a consultation venue in the SCI, as it is closed for the remainder of the consultation.

I would even question the wording of the home page relating to the draft Local Plan Consultation. The phrase “once this has been adopted” seems to suggest it is a done deal. Has this dissuaded people from commenting?

**Local plan 2019**

**Draft Local Plan Consultation**

Our Proposed Submission Version Local Plan (draft Local Plan) was approved for consultation by Full Council on 25 March 2019. Consultation on the draft Local Plan will run for a 9 week period from Monday 15 April until 5pm on Monday 17 June 2019.

Once this has been adopted, the Local Plan will shape, guide and influence how Warrington develops over the next 20 years. It's a hugely important vision for our Borough, both now and for the future.

## **Housing Predictions and Phasing**

Some of the questions I have about housing figures include:

- Is the calculation correct?
- Does it justify taking Green Belt?
- Is it correct for the Council to state that Green Belt could be taken before brownfield sites?  
Given the importance of the adverse effect on Green Belt surely other sites should be developed first. Housing predictions will change over time and it would be verging on criminal for Green Belt to be taken in place of brownfield sites only for projections to change with less future land required. Our Green Belt will then have been lost for no reason.
- Can the build out rates be realised when historically they haven't been?
- How can the cumulative environmental impact be quantified?

## **Calculations**

Anything that contains numbers or is based on numbers needs the most careful scrutiny. This includes housing forecasts, economic growth calculations, air quality predictions, traffic growth predictions. The whole case for the Local Plan depends on these numbers being correct. Can the



Inspector request assurance statements that all figures quoted or on which decisions have been based are correct and follow relevant guidance?

## **Conclusion**

There is a lot wrong with the consultation undertaken in relation to the Plans but I would ask that particular focus is given to answering the following questions:

- Have the Statement of Community Involvement undertakings been complied with? – I don't think they have (deposit locations closed for example)
- Have the cumulative impacts of multiple developments been adequately assessed?  
Applications for major developments have been submitted before validation of the Plans
- Is it "sound" to commit to further work later on in connection with Infrastructure when the whole Plan depends on suitable infrastructure?
- Are the air quality and Green Belt methods and assessments robust? Adding huge amount of traffic to the worst polluted town in the UK, continuing to breach legal air quality limits and taking a huge area of Green Belt without demonstrating very special circumstances is unsound.