



**To Whom it may concern**

**Re: Warrington Council's Local Plan Preferred Development Option  
Regulation 18 Consultation July 2017**

I would like to object to the content of the revised Local Plan of Warrington Council. More specifically the Proposed Development Option (PDO) of the Garden City Suburb and the proposed release of green belt lying between Grappenhall, Appleton and Stretton.

The main purpose of green belt is to control urban growth, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belt is their openness. The other purposes include prevention of neighbouring towns merging into each other, safeguarding the countryside, preserving the setting and special character of historic areas and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

One cannot help but think while driving around the urban areas of Warrington that there is enormous capacity for regeneration and improvements here, before resorting to encroaching onto green belt.

The green belt assessment performed and available as a supporting document is flawed. We commissioned a planning expert in this field, Mr Harry Shipley, to look more closely and professionally at this issue. You should have received his detailed and technical report, and I refer you to this document for my views. Essentially there is no quality assurance for this document, its methodology and performance. There are no authors and it is advised not to be used by a third party. Is it therefore evidence enough to base a huge release of green belt? The scoring methodology is also flawed, and some areas scored as weak, when looking at the figures closely, have been miscalculated. The value of this area of green belt is in its prevention of sprawl and conglomeration of the villages of this area and this has been "overlooked" in the report conducted by ARUP.

Mr Shipley also questioned the methodology used and scoring system, compared with professionally accepted and used standards. Again I refer you to his report.

I notice that the green belt assessments that grade the green belt area that separates Grappenhall Village and Appleton as poor have been carried out as a “desktop” exercise, with no site visit. Is this any way to classify a physical landscape such as green belt?

The assessment itself when read does seem flawed as this area stops Appleton merging with Grappenhall Village. Undoubtedly this would result in the beautiful, historic village centre, and sensitively developed surroundings, to merge in an urban housing estate confluent with Appleton and Stockton Heath. In so doing, losing the intimate, historic feeling of this very recognisable area. This would result in the loss of the heritage asset of the area of Grappenhall Village, the green belt between the village and Appleton helps to preserve the historic and picturesque character of this area, which would be lost if the proposed development went ahead.

This area of green space is used by many people for leisure activities; walking, dog walking, cycling, running, bird watching, school excursions, football, falconry, fishing, metal detecting, shooting and tennis. Both those who live locally, and those who live further afield visit. This makes it an important community amenity area. The area would not be so attractive for these uses with an extensive development of houses and industry, and its associated infrastructure.

The plan seems to omit to recognise that part of the greenbelt on Stockton Lane falls within the green cordon set to protect Grappenhall old village. This is set out in the village design statement available on the parish council website. There is no mention of this, or the other conservation area around York Road in the greenbelt assessment (although it does mention one in Warrington and a second in Lymm)

It has been judged in past cases, that preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to the green belt boundary. If proposing new green belt boundaries local planning authorities should; Demonstrate why normal planning and development management policies would not be adequate.

Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary.

Show what the consequences of the proposal would be for sustainable development.

Demonstrate the necessity for the local green belt and its consistence with local plans for adjoining areas.

Show how the green belt would meet the other objectives in the framework.

Inappropriate development is, by definition, harmful to the green belt and shouldn't be approved except in very special circumstances.

Why is there a need to “safeguard” green belt land for a time period after this local plan expires for future development? This is surely not land needed in exceptional circumstances? This land could be addressed at a later date. It is not safeguarded as green belt, but as future development sites.

The whole Preferred Development Option (PDO) is driven by the desire of the Council (or other third parties?) to create a “new city”, it is not the current need of the town, and there is little evidence or reference to this current (or near future need) of the town and its residents, just the desire for unrealistic economic growth.

The assertions of council representatives that Warrington does not want to become a city is in contradiction with the title of “new city” and “garden city suburb” and has understandably caused confusion.

Option 5 in the PDO, for example, which does not require reclassification of such large areas of green belt as option 2, has been dismissed without thorough discussion and evidence base. This surely questions exceptional circumstances for greenbelt release if there is another option that the council has considered which would not entail such drastic changes to the area of green belt.

The green belt satisfied the tests of durability when it was designated and there have been no exceptional circumstances to justify a change from this status. The key driver for green belt release seems to be the aspiration of the council to become a “New City”.

In the Council’s own document (p13 ; 4.6)

“The Council believes planning for this level of growth provides a unique opportunity to make the transition from a New Town to a New City. In doing so it can address the severe congestion which impacts on the town, unlock major brownfield sites and improve the quality of life for existing residents through improved infrastructure as well as the creation of new sustainable communities. Planning for this level of growth will require the Council to work proactively with the public and private sector to ensure the extensive infrastructure required to ensure growth is sustainable is delivered.”

The Council is proposing a housing target of 1,113 homes per annum for 20 years. The council has confirmed a total urban capacity for 15,429 homes. This does not include the extensive Fiddler’s Ferry brownfield site.

The Council concedes that this may be an overestimate of required housing, and also that it depends on the transition to New City status to generate the increase in population which would drive the need for this increased housing supply.

The need to release such a large tract of green belt, and to plan an additional 6000 – 8000 new homes on it is dubious to say the least, and does not demonstrate the “exceptional circumstances” required to permanently release greenbelt into to hands of developers.

Until Warrington reaches city proportions with demand and the infrastructure already in place to support such developments on green belt land “exceptional circumstances” cannot exist.

The projections and “extensive” infrastructure planning (for which there is not yet funding) of the council are not current exceptional circumstances.

Exceptional circumstances must be demonstrable that show the benefits of the development will outweigh the harm caused to the green belt. The National Planning Policy Framework (NPPF) policy is very clear that local councils can only take land out of the green belt in exceptional circumstances but they should have looked at EVERY other alternative first. Just the need for a development is simply not a sound enough rationale when councils are to develop their local

plans. A Strategic Housing Land Availability Assessment must be used considering Sites of Special Scientific Interest, protected sites, areas of outstanding natural beauty, heritage assets, etc.

The Council has also not yet produced Traffic Impact Assessments, Environmental Impact Assessments, up to date Retail and Leisure Needs Assessments or on-site Green Belt Assessments, considering these sites and their needs.

The PDO document is very technical and needs experts to drill down into these figures, which we will do if necessary in consultation with Mr Harry Shipley, a planning expert we have commissioned to challenge the PDO.

Looking briefly as a layperson there is little evidence, or reference to location of evidence, for many of the figures used.

On p5 the objective needs assessment (OAN) gives a figure of 839 new homes per annum, but this is based on 2012 surveys. A more recent report based on 2014 data (available May 2017) has been ignored by the council in preparation of the figures, and this gives a figure of 679-738 new homes per annum.

This range is more consistent with the latest Objectively Assessed Needs Number (ONS) live tables.

Interestingly Warrington's change in population is projected to be 20% from 2014-2025. This is the same as Liverpool, Leeds and Manchester, but below the national average of 23%, and far below that of London and its environs with increases up to 40%. Economically the International Monetary Fund has cut 2017 growth forecasts for the UK, indicating the need to reassess the economically derived figures and potential economic growth of the area. There isn't clarity about the time frame the growth projections are based on. If they are based on figures from the (unprecedented) financial boom prior to the financial crisis of 2008, this will obviously skew the projections unrealistically.

There is also no mention of how "Brexit" and its consequences may affect the population size of Warrington, i.e. if EU workers originally from outside the UK return to mainland Europe. Has any mapping of unemployment hot-spots of the borough been carried out, with potential local sites which could aid employment opportunities in these areas identified? This would create a more sustainable town and fewer additional transport issues.

There is no justification for the uplift in planned housing above that figure achieved using the new formula proposed by the Government (September 2017), as all the economic initiatives highlighted will potentially be needed just to maintain the current level of employment for residents of the town and the natural increase in population.

The council concedes that there is uncertainty in forecasting future job growth and that there is a reduction in rate of job growth forecasted towards the end of the Plan period. Until these figures are more certain, exceptional circumstances cannot be proven. It is presumptuous that the economically proven cities of Manchester and Liverpool will not be the "key drivers" of the North West economy, rather than Warrington.

The PDO does not fit with the growth of other neighbouring areas, and doesn't seem to be referenced to its place within the planning of the North West economic and residential growth. I fear for empty warehouses, low paid jobs, commuter suburb sterility and loss of the identity of Warrington, especially South Warrington, as a place to want to live.

The new formula proposed by the Government to provide a framework for a nationally consistent approach to development and housing has not even been mentioned in the plan.

There is no mention of the future of employment opportunities, considering technology and future changes. This must be considered in a plan that stretches so far into the future.

Also no consideration has been given to future brownfield sites that will come up over the period of the plan, only those available at the moment. There is no commitment to release brownfield sites over greenfield documented.

A shorter plan would give a much more rational approach to this issue.

If greenbelt is reclassified, it is then open to any development. Greenbelt can be built on currently, albeit with stricter planning scrutiny. Surely keeping greenbelt as such and having these these additional planning controls in place would be a positive aspect for the communities, character of the area and environment IF it can be proven that SOME (i.e. not thousands) of homes should be built on this land.

The area of green belt adjacent to Stockton Lane, Church Lane and Lumb Brook Road is particularly rich in wildlife. This is wildlife that thrives because of the unique mix of habitats here; managed grazing, arable farmland, hedgerows, woodland and the historic Bridgewater Canal.

Specific creatures include buzzards, water voles, newts, kestrels, owls, pheasants, stoats, hedgehogs, kingfishers, bats, foxes and myriad insects (including stag beetles) and small birds.

Kingfishers are afforded the highest degree of legal protection under Schedule 1 of the Wildlife and Countryside Act 1981. It is an offence to disturb these birds when nesting in any way. Human disturbance of nesting birds is a serious problem due to the nature of these birds behaviour.

Bats are afforded special protection by both domestic and international legislation. It is a criminal offence to disturb a bat roost (with or without bats in) or group of bats or to obstruct access to a bat roost (i.e. bat commuting areas).

There seems to have been no mention of ecological and environmental surveys of any of the greenbelt land to ascertain the presence of sensitive populations of wildlife.

The presence of a "country park" would not replace these habitats and many of these species would be lost. The other issue that increased housing brings, which would affect the nocturnal wildlife, is increases in light levels at night due to increased street lighting. Recent studies have highlighted the issues that bats have if areas are changed to a built up environment.

Stockton Lane currently has no surface water drainage systems in place, and so there would be a very real vulnerability for any polluting run off from increased use of this lane, or from neighbouring developments (both during and after the development phase) to enter the canal and cause environmental pollution problems.

The Biodiversity Strategy for England, Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services identifies "the protection and improvement of the natural environment as core objectives of the planning system".

The land here is of value for current recreational use, farming, ecological and natural beauty. It is not the low quality scrubland that makes up some greenbelt.

The government's Natural Environment White Paper, The Natural Choice: Securing the Value of Nature, refers to the role of planning in protecting and improving the natural environment and facilitating coherent and resilient ecological networks that reflect the value of natural systems. The aims of the White Paper include halting biodiversity loss by 2020 supporting "healthy, functioning ecosystems". The plans by Warrington Council fly in the face of these recommendations.

The recommendations also have positive steps to promote the natural environment, which are important when considering the future pressures and challenges of climate change (unless you choose to refute the scientifically proven problem of climate change exists).

Please refer to Warrington's Climate Change Declaration. How does the PDO relate to this document? Has the progress made in these commitments been achieved, or monitored, as promised, and have the results been shared as promised?

Another issue the Council identifies is current traffic congestion.

There is nothing concrete in the Council's plans to ease congestion into the town centre and onto the motorways.

More specifically there are roads in Grappenhall and Appleton which cannot be widened or changed to promote better traffic flow and these will always cause bottlenecks of traffic, which will only be worsened with the proposed increase in population in these areas.

Specifically:

Stanney Lunt Bridge – single track, weight restricted, historic listed bridge over the Bridgewater Canal leading into Grappenhall.

Grappenhall Village – cobbled, narrow road with single track, weight restricted bridge.

Lumb Brook Road – steep, fast, winding road leading down to a single track, height restricted, listed bridge.

Teachers at the local Cobbs Infant School have recently petitioned for a pedestrian crossing to be put onto this road due to safety issues, issues which would only be exacerbated by an increase in traffic.

Stockton Lane – a single track, winding country lane without surface water drainage. This lane has been closed for many years due to a fatal car accident.

The width of the lane is governed by the canal at one side and houses on the other at one end of the lane. In other places the lane is right on the canal bank and in others has a steep gradient. Not really the ideal site for a new bus route. This lane is extensively used for recreation since it was closed. There are many walkers, cyclists, dog walkers and families who use this area, and it is part of the English Half Marathon route.

When questioned about changes to the lane in the event it did become a bus route, the Council's representative at Lymm public consultation stated that there would be no changes to the lane to facilitate this. As the lane is currently just wide enough for a bin lorry to fit down, with no pavements or surface water drainage this is inconceivable. In 2007 it was judged that the lane should not be reopened for through traffic, for safety reasons, unless changes were made to the lane and it's surroundings. At the time there was no funding available for this. Interestingly, two further views have been shared by council representatives at consultation events when asked about this bus route. One, that the route was unlikely to go ahead, and the other that the route would go behind the houses on Stockton Lane, across the playing fields. If this is true then either the council have no idea how Stockton Lane will be used for, and affected by, this plan or the council representatives are not sharing the correct information. In either case it does not give confidence in the ability of the council to formulate and communicate their plans.

Infrastructure must be in place before any developments are planned. Planners can, and do, renege on previously agreed commitments regarding providing and financing infrastructure.

It has been admitted that the New Town didn't complete its infrastructure programme, and since then Warrington has continued to grow in size, sprawl and population. This accounts, in part for the terrible congestion thorough and around the town.

This is only likely to get worse as drivers try to avoid paying tolls at the new Mersey crossing, finding alternative routes, e.g. via Warrington.

The Highways Agency is particularly concerned about road loading if the current PDO goes ahead, and as pointed out by our planning consultant, has the power to veto any of the development plans if they are not satisfied with the safety and loading of the road network. Full details of Mr Harry Shipley's findings can be found in the report he produced for myself and the other residents of Stockton Lane. You have this in your possession so I will not repeat his detailed discussion of the matter.

It seems that with such a rigid road layout, adding more traffic to these roads would be both dangerous and a driver of increased congestion. The stationery traffic from such congestion would increase air pollution to a level that may be legally unacceptable.

In 2013, from WBC's 2016 Air Quality Annual Status report, 4.8% of deaths in Warrington were due to man made particulate pollution. This is above the average for the North West (4.6%). It admits that there are many areas in Warrington close to major roads where nitrogen dioxide levels are high and exceed national standards. WBC is measuring these levels in 50 places and in

2015 29 of these (nearly 60%) exceeded the council's objective of 40 micrograms of nitrogen dioxide per metre cubed. More worryingly in all of these areas the levels of nitrogen dioxide had risen since 2014. An increase in traffic around the town can only add to this when the council has not suggested any strategies to help combat air pollution from traffic and industry (e.g. park and ride schemes etc). In Grappenhall and Appleton, near a proposed site of housing and at two of the narrow restricted roads mentioned above, there are crossing points for children of two local primary schools. As WBC recognizes itself, air pollution particularly affects the most vulnerable in society, for example children. Air pollution in Warrington at some sites and times is at crisis point, with only Salford ranked above Warrington in the North West, and breaches the safe levels for PM2.5.

It is worth noting that Warrington has a higher than average level of car ownership, compared to the rest of the UK. I would postulate this would not be any different within the population of a new "Garden City Suburb".

The idea of turning the Transpenine Trail into a dual carriageway or train route is also difficult to envisage being a feasible option. Have the designers of the plan visited this area? Have they seen how wide the trail is? How close the houses are? The state of the old railway bridge with its gas pipe line?

The council accepts that the preferred development option would necessitate new facilities such as schools, health centres etc. Also added to this list would be waste facilities, the refuse tip at Stockton Heath would be inadequate for such an population increase. It would also mean securing funding from the NHS for an increase in dentist places. There is no mention in the plan if any of these facilities have secured funding, and so, if they are achievable or sustainable.

CQC inspections of January and February 2015 for Warrington and Halton NHS Foundation Trust showed a bed occupancy in excess of 100% with continual pressure for these beds. In winter 2014/15 A&E waiting times reached over 4 hours and by January 2016 full capacity was declared for the A&E department with waiting times reaching 8 hours or more at peak times.

New hospital and healthcare facilities must be in place before any major increase in population is considered (i.e. the PDO plans), or the council will be failing all of the residents in providing acceptable healthcare.

Are the CQC aware of these population expansion plans? Have they, or the current healthcare providers, been consulted on their view of the PDO?

The 2011 census showed 1 in 6 Warrington residents is over 65, and this figure is likely to rise over the period of the plan, yet there is no mention of care facilities, supported housing etc to cater for this age group.

These facilities are vitally important as, if it goes ahead, the new Garden City Suburb development will have a population in excess (by around 5,000) of the current populations of Thelwall and Grappenhall put together.

The current crime rate in Grappenhall is much lower than the average of Warrington. This rate will not just rise in line with increase in population, but in excess of the rise of population, most likely to the level of Warrington generally. How is this increase going to be prevented or serviced? Will there be more police

officers, more funding and a new police station? In the climate of austerity is this even feasible and deliverable?

A shorter plan (twenty years is longer than recommended or used by most authorities) of 10 years would enable a more accurate assessment of true needs for business growth and housing provision, once the current political and economic question marks have largely been resolved. The infrastructure that has been put in place (e.g. new high speed rail lines) could then be more effectively utilized, the current plans of neighbouring cities (who, let's be honest, have more of a draw for investment in future-proof employment opportunities than the town of Warrington, which is little more than a large retail park and warehouse area) could be incorporated.

The site at Fiddler's Ferry will at that point be available to develop (Government commitment to the decommissioning of all coal powered power stations before 2025). From documents issued by SSE, the operators of the power station, it is highly likely that this site will operate past 2020 due to increasing and unsustainable financial losses. This site must not be shied away from for development because of clean up or other costs. Brownfield sites must be developed in priority to green belt.

The brownfield register will be a necessity for Councils very soon, it is disappointing to note that Warrington isn't on the list of towns and cities who took part in a 2016 pilot scheme for this register, even though many neighbouring towns (e.g. Wigan) and cities did. Maybe this indicates their level of concern and commitment in this area?

The Empty Homes Programme was withdrawn by the present government in 2016, but is an area where a pioneering, future facing council would look to improve its town. Empty properties are a blight for residents, the environment and the authorities.

In reality profit is behind developers' reluctance to build on brownfield land. Building on green fields is more profitable and less difficult than building on brownfield that may need clearing or decontaminating. This means higher up-front costs for the developer and plots are often smaller, meaning less scope for the large homes that will make the most money.

No wonder that in consultation with developers, there was approval for release of greenbelt from developers, but no mention of using brownfield sites to capacity first.

It may be the case that councils are keen to remove land from the green belt for housing to increase their revenue. The government's "New Homes Bonus" is paid to councils for all houses built in their area, and research suggests that this is driving the increased amount of planning permission given by councils, including greenbelt areas.

Research conducted for the Campaign to Protect Rural England (CPRE) by the University of the West of England has shown that there is space for at least one million homes on brownfield land in England. I am sure that Warrington does not have an exceptionally low brownfield area compared to the rest of the country.

A recent CPRE report also showed that developments on brownfield land are completed more quickly than on greenfield sites, and academic studies have also shown that cleaning up contaminated brownfield land has public health benefits. These sites should be used before any greenbelt land is considered for release, rather than cherry picking fields in the greenbelt.

At the public consultation in Lymm, Council representative's acknowledged that WBC has no revenue or funding for ANY of the infrastructure needed for these developments and is reliant on revenue developed from sale of the sites and building of the houses. Surely this is not the sign of a robust plan, with built in contingency. It is usual for infrastructure such as roads etc to be guaranteed before houses are built.

I would also postulate that the "Garden City Suburb" would probably not be home to many workers in Warrington, but (as this area is currently) to commuters to Manchester, Liverpool and other areas of Cheshire, Trafford and Merseyside.

This is especially true, if the plans of the Council's representatives at the public consultation are to be believed, and that houses here will be representative of the houses already in the area (minus the necessary 5-10% low cost starter homes). Certainly if this is true they are unlikely to be in the price range of the low quality jobs that are going to be created in the "employment area" of the "Garden City Suburb".

The Localism Act 2011 represents one of the most far reaching reforms of the planning system since 1947, effected by "taking power away from officials and putting it into the hands of those who know most about their neighbourhood – local people themselves".

The presumption in favour of sustainable development is an operational principle for plan making and development management. The golden thread reinforces the need for positive evidence based plans that objectively meet the development needs of communities.

The community of South Warrington must be listened to and its needs, not those of developers, used to formulate a Local Plan.

The NPPF makes clear that viability and deliverability are key tests of all aspects of planning decision making, and requires local authorities to assess the cumulative burden of local requirements and plan policy.

In this case viability and deliverability cannot be proven. Funding has not been secured for the improvements to infrastructure that would be needed for the viability and sustainability of such large development plans over such an extended period.

The current council was elected in 2016, and there was no mention of the proposed plans to build on greenbelt, CPO homes or build new large transport links through villages. Is there any mandate from residents regarding these changes?

The PDO document itself is badly written and the maps provided in it and at the consultations are difficult to read, not detailed with regards to key points (such as changes in road layout) and at times contradictory.

The online form with questions to answer about the PDO is poor. It is not written in a way that is accessible to most members of the public, unless they have the relevant technical knowledge needed for that aspect of the plan. This questions whether this exercise is truly part of a “public consultation”.

I am also disappointed that I have learnt nothing of this development from council sources, but only from neighbours and social media. [REDACTED]

It is offensive that more commercial websites associated with WBC, such as Warrington and Co and speakers at events (Place North West’s Cheshire Development Update) such as Mr Farrell seem to be taking this development option and greenbelt release as already decided. Surely it should not be marketed to the private commercial sector as a development plan until it has reached the point (heaven forbid) of development being approved?

All in all it is worrying as a resident of the area of the proposed new garden suburb that the Council has not fully considered the implications, deliverability and sustainability of such a plan. It is concerning that the Council does not feel that the residents in the areas in the “Preferred Development” zones need to be formally informed about these plans, or of the public consultations meetings. I fear that many, especially more vulnerable groups, may not be fully aware of the plans and how it may affect them, or how to share their views with the council. I would be interested to know how this resonates with the Council’s Equality and Vulnerable Adults policies. From one of WBCs own documents “Priority 3: Aging well” ... “I am treated with dignity and respect and am included in my local community”. This should follow for all residents young and old.

I look forward to your consideration of these concerns.

Yours sincerely

[REDACTED]

