



Dear Sir/Madam,

### **Consultation comments on the PDO**

I am writing to you because the consultation document online is too difficult to read and understand. I am educated to degree level  but I have found the online consultation document to be unwieldy, confusing and difficult to read and understand.

My objections to the PDO are thus, which I have separated into discrete areas:

#### **Objections around the consultation**

The consultation document itself and the supporting files are unclear and difficult to read and understand. Much of the content is poorly written and illegible.

Many of the links to other documents do not work, or just go to the WBC landing page.

The maps are almost cartoon-like, but do not show landmarks, road layouts or road signs, so the reader has to wonder whether this is a deliberate ploy on the part of the authors. The maps should have been satellite images or maps with road names written on. As it is, it is impossible to understand the maps in the PDO.

The consultation documents are only available online, so the consultation has not taken into account equality issues, if people cannot access information online.

The consultation has not been well publicised, with a minimal coverage in the press before the consultation, and the use of obscure and irrelevant media, such as the Lake District-based 'Westmorland Gazette'.

The consultation dates were over the summer holidays when many residents would be away or busy, and it feels like WBC have given people the minimum time to feed back their views. A large proportion of people affected are not aware of the consultation, or are not aware of how to find out more.

The consultation should have been publicised by the council delivering leaflets, and reinforcing this with media/press releases and street notices. None of this has been done.

There has been very little public participation. Consultation events have not been well publicised so many residents did not know about them.

There was no consultation event planned for Grappenhall – the area to be most severely and adversely affected by the PDO – and when WBC representatives were asked about this at the Penketh consultation meeting, people were told that the reason was that they anticipated a lack of parking availability in Grappenhall village. It was only pressure from the press and Faisal Rashid that the consultation was extended and 2 extra consultation events were convened.

The consultation events have been poorly run and insufficiently staffed. There was little seating for infirm/elderly residents, people were expected to queue outside, especially at the Park Royal because a large meeting room had not been booked, and WBC representatives gave incorrect and conflicting information. For example, one said that the TPT may be developed to be a metro link, another said that the TPT may become a dual carriageway.

It seems clear that the consultation events were a box ticking exercise. There has been no record taken of who attended, and no recording of people's concerns or comments. People want to be involved in what happens to the town in which they live, but WBC have made it very clear that they do not care what people think about their plans.

The consultation has not been fit for purpose. The main driver for the consultation and PDO is the WBC drive to make Warrington a 'new city', but they are proceeding with this despite the fact that the people who live in Warrington are very much against this. In a Warrington Guardian poll, 85% of responders said that they do not want Warrington to be a new city. However the people driving this PDO – Mr Broomhead, Mr Farrell and the people behind Peel Group – none of whom live in Warrington, have made this their priority.

The residents in Warrington who are affected by the PDO feel that WBC does not care about their lives or Warrington itself - this is evident by the PDO, Peel's plans for Warrington and the likely decimation of the character of South Warrington.

### **Greenbelt impact**

The greenbelt land in south Warrington satisfied the needs of durability when it was designated greenbelt land in the first place.

The process for judging the land's greenbelt contribution to now be 'weak' is spurious, because the greenbelt land and its function has not changed; the only thing to have changed is the councils desire to build on it.

Many residents are concerned about the links and potential conflicts of interests between Peel Group (who own several parcels of land put forward in the call for sites), and the consultation company ARUP (who carried out the WBC greenbelt assessment, but who also publicise on their website their close links with Peel and how much work they do for Peel), and the extra greenbelt assessment that Peel commissioned Turley to do, which they have submitted to WBC as further evidence that the greenbelt land should be built on.

If the PDO goes ahead, everything that makes south Warrington a nice place to live and attracts people to the area will be lost. The character of Grappenhall village and the conservation areas around Victoria Road and York Drive will be damaged irreparably, because they will be so close to the development.

Greenbelt land exists to prevent urban sprawl, and prevent areas merging into each other. The PDO will turn the south of Warrington into a large, sprawling housing estate, like Runcorn new town or Birchwood, and there has not been any thought to the plans and ambitions of neighbouring authorities.

The villages of Grappenhall, Appleton, Appleton Thorn and Stretton would no longer be separated by greenbelt fields, but would be merged by adjoining housing estates. Not only would this change the character and aesthetic of the countryside, it would destroy the character and aesthetic of the different villages.

The Campaign for the Protection of Rural England has commented that the proposal for 9000 houses in greenbelt land is not sustainable for one authority.

It is unacceptable that WBC have the temerity to plan to decimate greenbelt land by first destroying it and then calling it a garden city.

There are related issues – WBC's increasingly risky financial position means that Moodys have downgraded WBC's position by 2 notches. If this is the case then the plans will not be deliverable. A planner at a consultation event has been quoted as saying that the red route through Walton cannot proceed at all without money from developers in other parts of Warrington.

A key issue that should be planned is infrastructure. We have the M62, M56 and M6 motorways, but they are old motorways and are not fit for purpose because they now struggle to serve the large volume of vehicles that use them. South Warrington is gridlocked if there is a crash on a motorway. In addition, the tolling of the Mersey bridges will mean that more traffic will use Warrington as a detour to avoid tolls, increasing the amount of traffic on the road. If 9000 houses are built, then the load on the motorways and local roads will be increased.

Following on from this point, Warrington town centre is a dingy and unpleasant place to visit. Large chains do not want to have a presence there (Marks and Spencer), and there are too many tattoo, vaping, charity and empty shops. In the evening, there is an undercurrent of violence and a large issue of drug/alcohol-related crime. Warrington town centre is not a place that you would choose to come to in the day time (as stated the shops are not a big 'draw', and Warrington is not well served culturally), or in the evening (there are no nice restaurants, bars, cinemas or theatres). Instead of striving for new city status, WBC should concentrate on making Warrington a thriving, prosperous market town. If families come to visit to shop, eat or have a night out, it will make Warrington a nicer, more prosperous, safer place. And that will make people choose to live in the town.

██████████ has said that councils should never build on greenbelt land. If Warrington is to be a new city – it needs to look at what Liverpool, Chester and Manchester do well and emulate that. In cities like Manchester and Liverpool, people choose to work and live close to the centre – to get to work and have a good social life. WBC could develop brownfield sites in the town centre and build like they do in cities – up, in terms of apartments. This would address the need for more housing and also provide cheaper housing for young people to get a foot on the property ladder.

The current plans for 9000 houses in the greenbelt between Grappenhall and the M56 will mean that they will be bought by commuters, so it will be easier for people to get to Manchester or Chester.

I feel that the drive to new city status is driven by greed. Greed for the extra council tax that will flow in, greed for the developers' money and the greed of capitalism.

WBC's actions in this PDO have made it abundantly clear that the council does not care about the people who live in Warrington – only about money.

The greenbelt land is currently farmed, contributing aesthetically and financially to the local area.

### **Environmental impact**

There is no environmental impact surgery in the PDO or associated documents. Animals and birds inhabit the greenbelt areas – some of the species the PDO will affect include but are not limited to: bats, badgers, dragonflies and damselflies, water voles, all wild birds - their nests and eggs, moths, butterflies, bumblebees, kingfishers, honey bees, hedgehogs, shrews, dormice, pine martins, ducks, frogs, herons, lizards, newts and toads.

It is a criminal offence to disturb or kill many species present within the green belt land that WBC has put forward for urbanisation in the PDO. New roads and building developments also disturb nearby wildlife outside of the earmarked area.

Woodland, meadows, verges, ponds, streams, hedgerows and trees provide vital resources for mammals, fish, birds, and insect species. The development of green belt land destroys entire habitats for our native wildlife and puts some species at further risk of extinction.

Biodiversity is key to the survival of life on Earth. Its loss deprives future generations of irreplaceable genetic information and compromises sustainability including pollination of crops and wild flowers.

As well as the impact on nature, the PDO will have a detrimental effect on air quality. Building the numbers of houses and roads, as described by the PDO, is likely to bring thousands of extra cars in to the town every day. There is clear evidence that motor vehicles make a significant contribution to poorer air quality and congestion.

In May 2016, the World Health Organisation said that Warrington is the second worst place in the North West for breaching air pollution safety levels.

In 2011 the Council's Local Transport Strategy said

- Warrington has a higher percentage of households with 2 or more vehicles (36%) than the rest of the North West (27%) or UK (30%).
- Warrington attracts more journeys to work (97,078) each day than it generates (85,813) and is the 8th largest attractor of work trips in Greater Manchester, Merseyside & Cheshire.
- Warrington has a higher percentage of people commuting over 20km to work in (17%) or out (18%) of the borough than the rest of the North West (10% & 14%).

These figures show that Warrington already has a heavy reliance on motor vehicles. Should the plans be approved air quality may worsen.

The [National Institute for Health and Care Excellence recently published its guideline on air pollution](#), and it is evident that the PDO does not adhere to this important national guideline.

### **Number of houses**

WBC have used a housing density of 30 dwellings per hectare in the PDO, but if you could build more dwellings in the town centre or its environs (eg apartments) then you could have a higher density of 40 dwellings per hectare (apartments), which would mean that you could have a lower density elsewhere. This would mean that you would need to use less greenbelt land.

This would also mean that apartments, which are cheaper to buy, would address a large part of the housing shortage that PDO seeks to address. Town centre

dwellings such as apartments would be attractive to people getting on the housing ladder or with low incomes, people looking for retirement housing, and people wanting to live in the town centre. This would also have the advantage of there being a lesser burden on the infrastructure and having a lesser impact on air quality, as people would not need to have cars. This is the model that is used in Liverpool and Manchester – building upwards not outwards - so it is one of the aspects of being a city that WBC should adopt.

## **Conclusion**

In conclusion, the PDO is based on a flawed ideal of Warrington being a 'new city' and based on a flawed consultation that is not fit for purpose.

Where I live matters to me and my family. We moved to South Warrington for its character and open green spaces. I would not want to live either in a city in any form, new or otherwise, or in a place devoid of character and green spaces – which is what the PDO proposes to turn WA4 into.

Please, WBC, think about your residents, and serve your residents and your town.

Keep the greenbelt that gives WA4 its character and beauty.

Make the town centre a bustling, thriving centre that people want to shop in, visit and live in.

Give us a good infrastructure in the town centre, a strong retail presence and a positive identity. Why not make Warrington a prosperous market town?

The PDO is based on 'option 2' – the aspiration of the council to be a new city. This is not what the people of Warrington want. If 85% of people do not want a city, then please listen to the residents and work with us to have a clear vision for Warrington for the next 10, 20, 30 years, taking into account the need for expansion, improvement and housing and balancing this with the needs of Warrington residents and the environment.

Yours faithfully,

