

Dear Sir / Madam

I object to the WBC Preferred Development Option, for a number of reasons – some emotional, others more technical – all of which I believe are shared by the wider community, both within Moore, which is disproportionately affected by the plans of the neighbouring Authority, and in Warrington itself.

My principal reasons for objecting to the PDO are:

1. The flawed vision for making Warrington a city
2. The inadequacy of the Consultation process
3. The miscalculation of the Housing needs
4. Significant detriment to the environment, air quality, and the unnecessary loss of greenbelt land
5. Increased pressure on local health services, and decline in health outcomes
6. The disproportionate impact on Moore village

While I will go into each of these objections in more detail below, in simple terms, my objection could be summarised as the wrong plan, for the wrong number, of the wrong type, of homes in the wrong places!

1. The flawed vision for making Warrington a city

- The residents of Warrington do not want to live in a city. Warrington is surrounded by a number of existing major cities – Manchester, Liverpool, Chester. If residents of Warrington truly did want to live in a city, there would be a net migration away from the town, instead the WBC plan is fixated on the premise of growth, seemingly at all costs. This undermines the entire purpose of the PDO.
- The PDO appears to be a ‘vanity project’ from the Council Executive to achieve City status, driven by personal ambition and aspiration, and as such is utterly unrepresentative of the real views and desires of the populace.
- Warrington aside, Moore is a village, with a strong and vibrant community presence. To my knowledge, none of the residents wish to live in a city – they chose to move to and settle in Moore due to its village location amidst the greenbelt. Residents have no desire whatsoever to live in a built up urban environment, in the middle of a continuous stretch of concrete between Warrington and Halton.
- I repeat – residents do not want to live in a city. This theme is echoed in my commentary below. WBC have produced absolutely no evidence of this supposed aspiration of residents, solely the views of the Council Executive – but this is unsurprising given...

2. The Inadequacy of the Consultation Process

- Case law from a 2014 Supreme Court case against Haringey BC sets a precedent that consultation must be carried out fairly. Warrington BC have failed in several respects.
 - The highest court in the land requires that if a person is to be ‘worse off’ as a result of the proposals they should be contacted directly. None of this has taken place – as a result, communication has been ineffective and compromised the consultation process.
 - There is no evidence of a scoping exercise around the consultation, and no links with the community in the form of local groups, community representatives or existing local forums.

- It is unclear how WBC have determined the necessary period of consultation, by giving the minimum possible time for consultation over the holiday period. As a result, many people may have been unable to access the crucial information during this period.
- There has been no proper data collection at the consultation meetings. A note of the number, or name & address of attendees was not taken. Feedback forms were not provided to the attendees to allow WBC or any other relevant body to determine the usefulness and appropriateness of these meetings. None of the WBC staff present at the meetings appeared to be taking any notes of the comments presented to them.
- The consultation timetable does not seem to include the requirement for a report to be produced summarising the results of the consultation that is currently being carried out.
- Even in times of local government austerity this is not just best practice, it is a requirement.
- The consultation process has been not only inadequate and badly communicated, but driven by an unjustified end point – the residents of Warrington do not want to live in a city, but they do want a vibrant and usable town centre and a fit for purpose transport infrastructure.
- WBC should have learned from earlier consultation stages and, rather than invite the easy building over the Green Belt, evolved a constrained development option driven solely by the innovative regeneration of brownfield sites to meet anticipated demographically required housing needs.
- The Green Belt satisfied the tests of durability when it was designated and WBC have presented no exceptional circumstances to justify a change.
- There is no evidence beyond an incorrect and inadequate financial model to support deliverability of even just the demographically required future housing needs.
- With its investment in Redwood Bank there is a suspicion that WBC are going to subsidise developers and are not independent to the process.
- The residents of the borough deserve a higher standard of disclosure and transparency than has been shown to date if WBC is to regain the support of the electorate.

3. The miscalculation of the Housing needs

- The PDO document is very technical and references certain key numbers as given “fact” without direct links to the source material or considering alternative calculations.
- The Objectively Assessed Needs (OAN) is cited on p.5 of the PDO as 839 new homes per annum - but this was based on 2012 surveys. Before publishing the PDO, WBC were in possession of an updated May 2017 report based on 2014 data which shows a comparable figure of just 738 homes per year (but could be as low as 679 homes pa), but this number has been ignored.
- As the 839 is taken as the base for the higher Economic Development Needs Assessment (EDNA), then if the 839 is a significant overstatement, so must be the EDNA.
- The lower number is more consistent with the 716 homes pa average until 2039 within the latest ONS live tables which could be used to underpin the Government’s proposed formula for calculating OAN published in September 2017.
- The PDO should have been prepared on the basis of the May 2017 addendum (or at very least stated at outset that it was based on out-of date estimates that had subsequently been shown to be significant overstatements).

- There is no recognition of alternative assumptions and so the broad range of potential outcomes, particularly those with much lower housing requirements.
 - The legal challenge to the previously adopted Local Development Plan was premised on the plan not properly reflecting the OAN and affordable housing requirement.
 - However the PDO is stated to be “Option 2” – this is based on the aspiration of the Council executive to create a “new city”, it is not the independent, objective and expertly assessed *need* of the town.
 - The data used by the officers to derive the housing need is highly sensitive to the interrelationship between employment, population demographics and dwelling occupancy. The particular assumptions used appear to have been selected to justify a higher housing requirement significantly above the OAN and do not appear logical, consistent or robust.
 - Option 2 is based on an excess employment and economic growth outlook that is based on very high level assumptions and considerations completely outside the control or influence of WBC, and ignore the competing aspirations of adjacent and further afield boroughs and housing areas.
 - All the economic initiatives highlighted under the EDNA such as Cheshire devolution and HS2/HS3 will, if they ever come to fruition, be needed just to provide jobs for the natural increase in the population, they are not a justification for even more housing.
 - The projections used are based on data periods prior to the Brexit referendum. The Plan should be based on an updated Strategic Housing Market Assessment that takes account of latest economic, demographic and migratory expectations.
 - In addition, the housing requirement should be based on a calculation of OAN that is consistent with the methodology and data underpinning the Government’s September 2017 proposals for a nationally consistent approach.
 - Any higher levels of development should be clearly and separately identified as excess to Needs and so subject to a much higher standard of justification and challenge.
 - There appears no specific consideration of how technology will impact lifestyles and working practices, an issue not unique to Warrington. Unless and until there is a proper understanding of future employment nature and density, it is almost impossible to define what employment land is required, let alone where it should be
 - There is no Government requirement to produce a twenty-year plan even if long-term ONS statistics exist.
 - WBC should produce a ten year plan, by which point we will be much clearer of the economic and migratory impacts of Brexit, the impact from any completed national infrastructure initiatives and what the consequences of technological change have been on work and home life (and balance). It would also allow for the decommissioning of Fiddlers Ferry and so the availability of an enormous brownfield site requiring regeneration.
- 4. Significant detriment to the environment, air quality, and the unnecessary loss of greenbelt land**
- Apart from the poor communication and engagement with residents, the Council officers have failed to carry out the necessary ecological, transport and air quality surveys that would have informed a robust and sustainable plan.
 - The Wildlife and Countryside Act 1981 is the primary legislation which protects animals, plants and habitats in the UK.
 - It is a criminal offence to disturb or kill many species present within the green belt land that Warrington Borough Council has put forward for urbanisation in the

Preferred Development Option. New roads and building developments also disturb nearby wildlife outside of the earmarked area.

- 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, honey bees, hedgehogs, shrews, dormice, pine martins, ducks, frogs, herons, lizards, newts and toads.
- Game birds are not included in the act, they are covered by the Game Acts, which fully protect them during the close season. Brown Hares are also protected in the close season.
- 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.
- The groundbreaking UK National Ecosystem Assessment (NEA) published in June 2011 provides a comprehensive account of how the natural world, including its biodiversity, provides us with services that are critical to our wellbeing and economic prosperity. However, the NEA also showed that nature is consistently undervalued in decision-making and that many of the services we get from nature are in decline. Over 40% of priority habitats and 30% of priority species were declining in the most recent analysis.
- 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.
 - i. Air Pollution is recognised as a contributing factor in the onset of heart disease and cancer. The health cost of this in the UK is thought to be about £16 Billion every year.
 - ii. Professor Paul Cosford the Medical Director for Public Health England, a national organisation that advises the Government and Local Authorities how to improve everyone's health said in March 2017
“Air pollution can damage lives with harmful effects on human health, the economy and the environment. It is the largest environmental risk to the public’s health, contributing to cardiovascular disease, lung cancer and respiratory diseases.
It increases the chances of hospital admissions, visits to Emergency Departments and respiratory and cardiovascular symptoms which interfere with everyday life, especially for people who are already vulnerable. Bad air quality affects everyone and it has a disproportionate impact on the young and old, the sick and the poor”
<https://laqm.defra.gov.uk/assets/63091defraairqualityguide9web.pdf>
 - iii. In Warrington in 2013, 4.8% of all deaths were caused by man-made particulate pollution in our air, which is equal to 95 unnecessary deaths a year. This is slightly worse than the average for the North West of 4.6%.
 - iv. In 2015 WBC measured levels of a harmful air pollutant called Nitrous Oxide in 47 places around the town. It has an annual mean objective of keeping levels below **40µg/m³**. The Council’s own monitoring showed that in 2015, 28 (60%) of

those sites had pollution levels higher than their own objective. In 2014 only 8 (17%) of sites exceeded that level so Warrington's Air Quality worsened. Information source for points 1,3 & 4. is WBC Air Quality Annual Status Report 2016.

https://www.warrington.gov.uk/info/201090/environmental_issues/2024/air_quality_and_pollution

- v. 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.
 - vi. In 2011 the Council's Local Transport Strategy said:
 - o Warrington has a higher percentage of households with 2 or more vehicles (36%) than the rest of the North West (27%) or UK (30%).
 - o 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.
 - o 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%).
 - Again, this undermines WBC's premise that residents desire to live in a city – residents are clearly demonstrating their desire in a town (or village, i.e. Moore!), and commute to a city for work.
 - These figures show that Warrington already has a heavy reliance on cars and other polluting vehicles. Should the plans be approved air quality may worsen.
 - The plans are highly likely to increase the pressure on local NHS services due to poorer air quality.
- 5. Increased pressure on local health services, and decline in health outcomes**
- Reports from the Care Quality Commission, who are responsible for inspecting health services, talk on many occasions about how skilled and committed the staff working in our hospitals and the community are.
 - NHS leaders in Cheshire and Merseyside have developed a sustainability and Transformation Plan which means they have to save over £900 million by 2020. There will be very little money to grow services to meet the needs of Warrington's population.
 - In England, Clinical Commissioning Groups (CCGs) that are responsible for planning, commissioning and monitoring our health services are reviewed every year. A report published by the Government in July 2017, which was a national assessment of all Clinical Commissioning Groups, said that **Warrington CCG requires improvement**.
 - CCGs face a very difficult task, particularly as NHS budgets are generally recognised as being under pressure. It is unclear how this will be managed if the population of Warrington increases in line with the PDO plans. - <https://www.england.nhs.uk/wp-content/uploads/2017/07/Annual-assessment-report-16-17.pdf>
 - The Royal College of GPs said in 2015 that Warrington was one of the top ten places in England that has a shortfall in the numbers of GPs for the size of our current population. They said we already need a 57% increase in our GP numbers (55). There is a national shortage of GPs. It is not clear in the PDO how the additional GPs the population will need will be found. <http://www.pulsetoday.co.uk/your-practice/practice-topics/employment/someareas-of-england-needing-more-than-50-boost-to-gp-numbers-claims-rcgp/20009186.article>
 - When the CQC last inspected Warrington and Halton Hospitals they said that it **requires improvement**. In a report published in June of this year Warrington

hospitals were shown to have missed some of the care standards that they are expected to achieve. These included

- A&E 4 hour waits – **Warrington 91.55%, Target 95%**
- Cancer patients having first treatment within 62 days **Warrington 75%, Target 85%**
- Patients with breast symptoms waiting for 2 weeks – **Warrington 87% Target 93%**

<https://improvement.nhs.uk/resources/quarterly-performance-nhs-provider-sector-quarter-1-201718/>

- They also said however that medical care, including older people’s care **requires improvement** as does intensive and critical care, maternity and gynaecology care.
- The CQC raised concerns about access to services and delayed discharges reporting that **all the hospital’s beds were often full** and that patients were unable to get the support they needed to go home.
- In addition, the CQC raise concern that there were **not always enough doctors** to see patients in a timely way and that there were **not enough nurses to cope if patients needed additional care**. Because of these things the CQC were concerned that it was difficult to be sure that patients ended up on the best ward for their care. - <http://www.cqc.org.uk/location/RWWWH>
- The Bridgewater Community Trust provide many of the community services to Warrington. The CQC published a report about this organisation in February 2017 and said they feel it **requires improvement**. They found some areas of **outstanding practice and good services** including community inpatient care, some services for adults and good work with the ambulance service. They also identified some areas that require improvement including dental care, services for children, young people and families, urgent and end of life care. They also expressed concern about staffing numbers and waiting times. - <http://www.cqc.org.uk/provider/RV2>
- The CQC assesses organisation using 5 categories. This is what they said about our existing services:

CQC Assessment	Warrington Hospital	Bridgewater Trust
Safe	Requires Improvement	Requires Improvement
Effective	Requires Improvement	Good
Caring	Good	Good
Responsive	Good	Requires Improvement
Well Led	Requires Improvement	Requires Improvement

- This document shows that there are many good things about our health services but also that they are under pressure and are not always able to give us the quality of care we need.
- It is unclear what the impact of an increasing population would have on our local health services.

6. Specific issues for Moore

- Valuing the local environment – PDO objective W4 seeks to provide new infrastructure, but this needs to be balanced against objective W5 which seeks to reinforce the character and local distinctiveness of Warrington’s pattern of green space and protect its built and natural assets.
 - WBC have only considered the natural assets within their own borough boundary, whereas in reality their residents enjoy the current countryside,

canal, historic village and pub in Moore which immediately adjoins their boundary

- Development
 - One of the main purposes of green belt as defined by the national planning policy framework is “to prevent neighbouring towns merging into one another” – PDO option 2 would reduce the gap between Warrington and Runcorn (in Halton Borough) to non-existence, with Moore ‘sandwiched’ in-between, creating an almost continuous built-up area between the two urban conurbations.
- Warrington Waterfront Proposals – Port Warrington proposes a large distribution centre with 200,000 square meters of warehousing on land to the north of the canal.
 - The proposals would have a huge detrimental impact on the 80 homes at Promenade Park, Moss Lane, Moore, which directly face the proposed development. It is essential to have a landscaped buffer between any commercial development on the north bank and these 80 homes – the open water of the canal is insufficient to buffer noise and visual impact, which in its current format is wholly unacceptable. A noise assessment with suitable mitigation measures should be submitted by Peel in relation to the above.
 - Moore nature reserve would also be lost under current proposals – this is heavily used by many people and forms a valuable green lung for Warrington and its environs.
- The Southwest Urban extension – nearly 2000 homes and a new primary school and local centre are proposed between the A56 and Moore.
 - WBC’s green belt assessment by Arup (Oct 2016) and its own additional sites assessment contains an analysis of the value of different parcels of greenbelt – this work was flawed, in that it acknowledged Walton village conservation area, but it ignored the historic setting of Moore village conservation area, which it will have a greater impact on. There are also a number of significant historic buildings in Walton which would be adversely affected by the proposals – including the Old School, Porch House Farm and Cockfight Cottages which front onto Runcorn Road (and are listed as historic assets in WBC Core Strategy, Feb 2014).

I look forward to your response in due course.

Yours faithfully,

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