



Dear WBC Planning Department

I would like to place on record my objections to the Preferred Development Option (PDO) of the Garden City Suburb. While I strongly oppose the whole vision of the plan, I am going to concentrate my arguments around the development of the Green belt in the Grappenhall area.

Firstly, I feel the value for the greenbelt adjacent to Stockton Lane has been vastly underappreciated by the ARUP report commissioned by yourselves. This area of greenbelt is essential to stop the villages/areas of Grappenhall, Appleton and Stretton from becoming one uniform settlement, and in so doing losing all of each areas character.

Mr Harry Shipley, commissioned on behalf of myself and residents of Stockton Lane, has looked in detail at this report and found fundamental flaws in its production and methodology. I refer you to his submission, which I know you have received, for the full details. However I include an attached copy of Mr Shipley's submission in this email to avoid any confusion.

The main driver for greenbelt release seems to be generation of funds under the guise of becoming a "new city"

Maybe it would be better to focus on improving Warrington as a town, as currently it is in desperate need of such.

The scoring methodology in the ARUP greenbelt assessment 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.

I feel the following statement from WBC's own website regarding the ARUP greenbelt assessment should be considered;

**This is an initial assessment and there will be a need to undertake more site specific assessment work as part of the Local Plan Review process. This assessment does not consider whether exceptional circumstances exist or make any recommendations relating to the alteration or review of Green belt boundaries.**

A major brownfield site has been omitted from the plan (Fiddler's Ferry power station), and no consideration has been made of brownfield sites which will become available over the time period of the plan.

The calculation for new homes is also flawed and has been questioned by different experts. The government's new formula has not been used and the uplift cannot be justified.

Certainly no exceptional circumstances are proven for greenbelt release, except the aspiration of a "new city" and the cash this would require.

Secondly, another major concern is the placement and timing of infrastructure for any development that goes ahead. I was informed by one of your representatives at the Lymm consultation that the council has no funds to pay for this at present. Therefore this option cannot be considered sustainable or viable.

Mr Shipley has brought to my attention the role the Highways Agency plays in signing off the plans, and at present this seems a long way off, although I understand this is currently under discussion. Please again refer to his report for full details.

Thirdly, the road network around Appleton and Grappenhall is not suitable for such an increase in traffic. There are narrow, single track roads, weight restricted bridges and height restricted bridges. These roads cannot be altered and with the landscape would be very difficult if not impossible to add further Bridgewater Canal crossings. The idea of using Stockton Lane as a bus route is ludicrous. It is single track, no surface water drainage and surrounded by important wildlife habitat. There is a Local Wildlife Site (information form Cheshire Wildlife Trust) at the edge of the fields bordering Stockton Lane which has not been considered in the maps/plans.

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.

No consideration seems to have been given to the vast improvements needed in healthcare. The most recent CQC report from Warrington General Hospital is less than ideal with significant room for improvement identified. Has a plan been formulated with NHS England regarding the extra funding needed to provide for the increase in population? The same argument applies to dental, pharmaceutical and social care provisions. Other concerns include:  
Pollution

Warrington Borough Council's credit score has recently been downgraded by Moody's. This is due to high risk, expensive spending plans based solely on increasing debt levels by borrowing. The notion of such vast plans over such a long period with so many variables in this climate seems untenable.

Warrington Borough Council have not bothered to perform Environmental Impact Assessments, Multi Modal Traffic Assessments, industry standard Greenbelt Assessments, Pollution level Assessments, just to name a few, which is very disappointing. It also means that the Local Plan PDO, in its current state, is vague and unfit for purpose.

Maps are difficult to read and very vague in what they are referring to. How can residents comment on such vague ideas?

The Consultation process was poorly run. Communication by the council was atrocious. I learned of the plans and consultation events from neighbours and social media. I have heard nothing directly from the council, despite a major bus

route proposed to run past my front door. Instead a notice of the Local Plan PDO public consultation was posted in the Westmorland Gazette. Comments please?

We do hope that WBC take account of all the well informed and educated objections and views that have been voiced over this consultation period. As mentioned above we have enlisted the help of a planning expert for this initial consultation. We have funding in place to ensure his guidance through the continued planning process, even progressing to judicial review should it be required.

Yours faithfully

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