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**Objections and comments on the Warrington BC Consultation and Preferred Development Option (PDO)**

I object to the PDO, principally for the following reasons;

1           Inadequate and flawed Consultation Process

WBC have wholly failed to consult, inform and engage the affected communities. Whilst there is no general legal duty to consult people affected by a decision a duty to consult is likely to arise out of the Council's common law duty of fairness as outlined in (R(BAPIQ Action Limited) v Secretaey of State for the Home Department (2007) EWCA Ciy 1139. Furthermore in Haringey Borough Council Supreme Court case of 2014 the key factors raised were that the Council should consult those where the authority is contemplating depriving someone of something;

WBC is contemplating depriving the community of green space, green belt, the very lungs of our locality that these open spaces provide, ease of movement in terms of traffic flow, health, in terms of deprivation of public health particularly air pollution, ecological benefit flora, fauna and wildlife which will be diminished as a result of the proposed plans.

The Authority should specifically identify and consult if someone is likely to be worse off by the proposals - see above. Vast swathes of the local community will be tangibly worse off by the proposals.

The authority should consult allowing sufficient time to notify people and advise them of the options.

It is apparent that Warrington BC has failed in the above. There has been no awareness or notification by the Council. The plans have only come to my attention through friends alerting me to the fact.

Surely, public notices, newspaper (Warrington Guardian) notices and Publicised meetings would have been proper and expected? Whilst I appreciate libraries have the plans, the community need to know of the plans to know to access them in time for the consultation timeframe.

Whilst the PDO is on the Council's website, one has to a) have access to a computer and the internet b) be proficient in the use of a computer and c) know where to look for the PDO. This would rule out a large proportion of the affected community.

If one has the skills outlined above, and manages to access the PDO, the wholly inadequate layout of the information and quality of the plans is disgracefully misleading and lacking. One needs to have an intricate knowledge of the various areas and be able to decipher the maps to work out where the proposed developments are located. The average man on the street would be wholly intimidated and it seems that this is deliberate ploy to baffle or conceal the true extent of the misery proposed by the plans. Why are these plans not sufficiently labelled, transparent and user-friendly?

The timing of the published plans appears to have coincided with the principal holiday period. Again, an attempt to pass them 'under the radar' of the affected community?

Having talked to many of our neighbours and friends, so many of them (who would be directly affected, ie overlooking a new housing development) were wholly ignorant of the Authority's plans. Surely, people in such direct proximity should be served with notices, have information posted to them and be positively informed of the plan?

## **2            Objection to the proposed use/disregard of Greenbelt**

There are sufficient brownfield sites in the locality which should be used in priority over Greenbelt. Once swallowed up by massive housing estates, these green spaces will never be recoverable which will be to the detriment of the public health. There seems to be no consideration of the impending decommissioning of Fiddler's Ferry. What a wonderful opportunity this site would provide for the apparent housing needs of the locality. How short sighted to turn a blind eye to the opportunity here whilst focussing on the lucrative, lush green fields of South Warrington.

### **2A        Use of Transpenine Way/Bridle Paths**

In short, the answer is no – these conduits must be preserved for the community, for health, relaxation and enjoyment.

## **3            Protection of Wildlife**

The proposed plans will have serious adverse, irreversible and catastrophic effect on wildlife within the Green belt. The urbanisation of this precious land that Warrington BC proposes. In particular the following species will be diminished if not eradicated; bats, badgers dragonflies, newts, toads, herons, frogs, dormice, hedgehogs, all species of bees, butterflies, moths, toads, ducks and wild birds. These species are protected under The Wildlife and Countryside Act 1981. This Act also protects plants and habitats within the Green belt that Warrington BC are proposing to disturb, change and damage and eliminate to catastrophic and devastating levels. The UK National Ecosystem Assessment, (NEA) published an account of how the natural world provides us with services critical to our wellbeing and economic prosperity in

June 2011. The NEA shows that nature is consistently undervalued in decision making and furthermore, over 40% of priority habitats and 30% of priority species are declining. What a legacy the Warrington BC PDO will leave. How this will irreversibly impact on the community for such short term economic gains. After all, this land comes at a high price, with greater prospects of taxation and gain but with sobering consequences not only for this generation but the generations that ensue.

#### **4 Traffic**

If the Council was not already aware, Warrington in particular Stockton Heath, Bridge Foot and Sankey is oft times at a total gridlock. Stockton Heath, Appleton, Grappenhall are surrounded on three sides by water; the Ship Canal, River Mersey and Bridgewater Canal. Whilst a further crossing is proposed, surely this is required in any event to alleviate the existing traffic jams? What is more, the introduction of tolls on the Widnes bridge(s) will only increase traffic through Warrington as people opt to avoid this additional taxation. The proposed number of new homes (a wholly exaggerated and disproportionate number) will grind South Warrington to a complete halt. What happens when there is an accident on the M6, M56 or the Thelwall viaduct closes? I will answer this question for you; The traffic comes through Warrington! If your proposed development takes place, then the consequential additional thousands of extra vehicles will deliver economic and environmental effects that will be catastrophic. Additionally many of your plans lead traffic onto humped back bridges which will, obviously, lead to long delays as traffic passes single file over these bridges.

#### **5 Air Quality and public health**

As the Council will be aware, Warrington's deaths attributable to man-made particulate pollution on the air is higher than the North West average. Namely 4.8% of deaths in 2013 were caused by such pollution as opposed to 4.6% respectively.

By your own objective (keeping Nitrous Oxide levels below 40ug/m<sup>3</sup>) in 2015 the Council measure levels of the gas in 47 places around the town. 60% of the sites had higher pollution levels than the objective. See WBC Air Quality Annual Status Report 2016. The PDO is only going to worsen these worrying statistics and adversely impact on the health of our families, causing unnecessary deaths. To substantiate my concerns, in 2016, the World Health Organisation stated that Warrington is the second worst place in the North West for breaching air pollution safety levels.

The impact of the PDO will worsen these statistics. By your own Local Transport Strategy in 2011 you state that Warrington has a higher percentage of households with 2 or more vehicles (36%) than the rest of the North West (27%) or UK (30%). Furthermore Warrington has a higher percentage of commuters travelling over 20km to work in or out of the borough (17 & 18%) than the rest of the North West (10 and 14%).

These figures alone demand that the Authority reconsiders this flawed and irresponsible plan.

#### **6 Number of houses**

The PDO proposes an exaggerated and disproportionate number of required houses. A considered re-approach is desperately required. Perhaps a maximum of less than half the houses would be a starting point and as such this would protect the precious Green Belt.

The above are some factors which are crucial that the Authority takes into consideration. Whitewashing over these will only lead to future problems, cost and disenfranchisement.

Yours faithfully

A solid black rectangular box used to redact a handwritten signature.