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28.09.17

Dear whom it may concern,

I wish to object to the current Preferred Development Option for the following reasons:

- **Concerns over calculation of land needed for new housing and employment over the next 20 years.**
 - We want to challenge the 'Objectively Assessed Need' (OAN) figure in the recent Strategic Housing Market Assessment.
 - We suggest that Warrington Borough Council should review the figures calculated from the SHMA In light of the Government's consultation and proposed new method
 - The new methodology requires a consistent approach across local authorities based on a formula that takes account of government household projections and housing affordability ratios.
 - Volume of housing projected in the plan currently exceeds that of the government target – are these aspirations deliverable and realistic?
 - Housing completions in Warrington over the last 10 years have generally been in the range of 500-700. The new local plan proposes a housing figure of 1,113 dwellings per year.
 - Does the Local Plan demonstrate that the jobs and infrastructure, can and will be provided to support the proposed housing figure?
 - On what grounds are these increases justified? We understand that Warrington has strong economic growth aspirations but how will these be realised?
 - In light of economic uncertainty following Brexit are these projections still relevant?

- We request that an updated evidence paper should be prepared in light of the new methodology using the proposed formula in the consultation document. Indeed Paragraph 2.10 of the Warrington consultation document acknowledges Warrington's housing needs are reviewed in line with Government recommendations. We want this review to happen before the Local Plan progresses any further.
- We request transparency on the Council's duty to cooperate with neighbouring authorities. Many residents in South Warrington commute to workplaces outside of the town so arguably the housing need could/may be met elsewhere e.g. Cheshire East, Trafford, St Helens, Halton etc.

- **Concerns over release of land from the Green Belt**

- It is proposed that significant amounts of Greenbelt will be lost if the preferred option goes ahead.
- The overall housing need figure needs to be reviewed due to the Government's consultation. If less housing is needed, or different types of dwelling are needed, the overall housing figure could be reduced, and thus loss of Green Belt can be mitigated.
- Planning Policy advocates a Town Centres First approach to development. The local authority should seek to first develop in urban areas and brownfield land, with Green Belt only being released under exceptional circumstances.
- There is enough Brownfield land in the area to build 15,000 houses. Once housing need is reviewed this could be sufficient to meet reduced housing requirement, therefore allowing the council to protect and preserve Green Belt land.
- Large proportion of the proposed house building to be located in the least densely populated and more expensive areas of the town. Density projections are relatively low and affordability likely to be an issue. Do these proposed dwellings take account of societal changes e.g. increase in single person living, aging population etc?
- How will the Council protect existing neighbourhoods and villages?

- **Concerns over proposal for preferred development option of Warrington Garden City Suburb**

- Is this really deliverable and have the infrastructure needs been properly assessed.
- Have transport impacts been properly assessed? Where is the transport modelling which supports these proposals?
 - At the consultation meeting in Lymm we were advised this is currently underway. We request full transparency and disclosure in respect to transport modelling, especially in respect to provision of new strategic link roads.
- The supporting documents webpage lists 'Warrington Transport

Summary 2017' however this is just a broad overview of issues in Warrington. Where is the detailed consideration of the impact of the Garden City Suburb and infrastructure that will be needed to mitigate its transport impacts.

- The Local Plan and concept documents use the word 'sustainable' many times. Yet there doesn't appear to be any demonstration of how sustainable development will be ensured. For example there doesn't appear to be a strong commitment to public/active transport.
- Calls for sites map on page 11 of the concept document – coverage appears to be patchy. Does the council have confirmation from landowners of other parcels of land that they will be made available?
 - Is a holistic approach to master planning evident? Or will we end up with a piecemeal development that fails to deliver infrastructure?
 - Grappenhall Heys development was severely criticised in the Urban Task Force reports for this very issue.
- Where is the up to date Strategic Flood Risk Assessment on the supporting documents page? There are a number of main rivers in the area.
 - Has the Environment Agency been involved in preparation of the concept document?
 - For completeness the topography and watercourse map on p18 of concept doc should also show Flood Zone 2 and areas a risk of surface water flooding.
- **Specific concerns over transport and infrastructure in the Preferred Development option, including potential use of the Trans Pennine Trail as strategic transport route**
 - Have transport impacts been properly assessed? Where is the transport modelling which supports these proposals?
 - Where is the detailed consideration of the impact of the Garden City Suburb and infrastructure that will be needed to mitigate its transport impacts?
 - Section 2.4 on page 20 of the concept document highlights the constraints in local road network and states that significant road infrastructure requirements will be needed, yet no further evidence is provided on this.
 - We don't consider there is enough transport evidence to support this development option.
 - Concept document appears very unclear in terms of its treatment of the Trans Pennine Trail. Appears to be suggesting a new 'strategic road/public transport route' along its course.
 - We have been advised this is just a 'concept' however we have

major concerns as residents of the local area.

- This 'concept' could with immediate effect, impact on the value and saleability of properties along its route. If it is only a concept please consider removing until all assessments are complete and final route agreed.
- If this concept becomes formalised, some properties could be subject to Compulsory Purchase Orders. For other properties their outlook could be severely impacted and would no longer have quiet enjoyment of their property.
- We are concerned if this route is agreed that it would have negative impacts on heritage, habitats and local wildlife.
 - Knutsford Road bridge cited in the Unitary Development plan as being of significant local, architectural and historical interest.
 - Well-used nature path utilised by walkers, runners and cyclists and part of the National Cycle Route Network
- We are concerned if this route is agreed that it would have negative impacts on the health of local residents – air pollution is already very high in the area.
 - 2016 study by the World Health Organisation showed Warrington was recorded as having the 2nd highest air pollution levels in the North West. Impact on health and mortality. Why would the Council wish to increase this further?
- The proposed route does not appear to align the Local Plan objectives for sustainable and active travel
 - No assessment of impact of the road on traffic network, particularly Warrington Town Centre.
 - Page 38 map key identifies this as a 'strategic road' – the public transport option seems to have disappeared here!
- The Trans Pennine Trail is a strategic green infrastructure asset and active travel corridor. Removal of this would go against objectives in the new Local Plan.
- We accept that this is currently only 'high level concept' but consider it lacks the evidence required to back it up and it is very vague in places and lacks public transport emphasis. For example a diagram on Page 31 includes 'potential conceptual desire line for better public transport connectivity'. What does this mean? And why does it appear to just be a random line through an existing housing area

- **Concerns over the consultation process**

- Many residents only became aware of the Local Plan and preferred development option following grassroots local residents campaign
 - Lack of advertising, holiday period, not held in are affecting local residents
 - Inconsistent information provided across meetings
 - Public consultations being held prior to the infrastructure feasibility study results being completed and published. Council representatives have been unable to answer whether the feasibility study is taking place on all 5 reported options or just the preferred development option.

- **Concerns over funding**

- No details on funding routes for infrastructure requirements which will be significant
- No details on funding routes for schools and health care provisions

Kind Regards

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