



Local Plan
Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH

16th June 2019

Dear Sir

Consultation Response on Proposed Submission Version of the Local Plan

I write to set out my STRONG OBJECTION to the Proposed Submission Version of the Local Plan (PSVLP) which is the subject of this current consultation.

I, along with thousands of other local residents, have objected to previous drafts of the document on a large number of grounds. I am disappointed that the Local Authority appear to have had such little regard for the very valid comments and concerns of the communities it purports to represent and that they have pushed to publish this draft for consultation without seeming to address them in any way.

Despite the Council's best efforts to confuse matters with poor quality documentation, unreliable and often inaccessible websites, contradictory views expressed at consultation events etc, I understand that the current consultation seeks only to address matters of "soundness" in relation to the preparation of the plan and development of its contents.

Paragraph 35 of the National Planning policy framework sets out four grounds against which the soundness of a local plan should be measured. It states that any plan should be:

- Positively prepared - as a minimum, it should seek to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified - should take into account any reasonable alternatives, and be based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- Consistent with national policy – should enable the delivery of sustainable development in accordance with the policies of the NPPF.

Having regard to all of the above, I therefore consider that the PSVLP of the Local Plan is UNSOUND for a range of reasons, but particularly including the following.

OBJECTIVE W1: ECONOMIC GROWTH

I consider that the council's ambitions are artificially inflated and would be undeliverable in the best of circumstances. However, in a climate of massive economic and political uncertainty, they are massively over ambitious and hence undeliverable and unsound.

Policy DEV1 – Housing Delivery

Housing Numbers

I do not believe the plan takes appropriate account of the town's housing need and sets targets well in excess of those which might reasonably expected.

I appreciate national policy guidance has been evolving on this matter. However, government ministers are on record in correspondence explaining that those targets set by government centrally are just that, targets, and they are not compulsory – they are dependent on other factors locally which may affect delivery. It would appear that the PSVLP is steadfastly refusing to recognise this and is instead using threat of “non compliance” with Government targets as a way of forcing the Council's proposals through.

The forecast numbers based on 2016 population growth figures should be used as a starting point for forecasts, not those from 2014. The numbers forecast greatly exceed historical figure and are therefore unrealistic.

It also appears that the Council's projections fail to take account of any uncertainty over whatever the eventual Brexit deal turns out to be, and assume that this will have no impact on potential housing demand.

Furthermore, the argument that additional jobs means additional housing requirements is also flawed and is contradictory in the context of the Council's proposals. The proposals contained in later sections of the PSVLP (Dev4) promote the need for commercial development in the greenbelt to generate jobs for local people. However, they also seem to be proposing additional houses for incoming employees. If jobs are truly for local people, then surely there should be a much greater emphasis on upgrading existing poor quality accommodation in the Borough rather than developing so-called “executive” housing on green field sites to attract new residents and which will not be affordable to those on the lower wages offered by the limited number of jobs in logistics.

There remains a great deal of confusion and a lack of transparency in relation to the reasoning behind the number of new houses the plan seeks to provide, and as a result should not be a surprise when

the Council's motivations behind this are questioned given their commercial relationships with the developers and other agencies involved in promoting profitable residential development.

For these reasons, I consider that the housing requirement forecast by the Council is unsound, over ambitious and undeliverable.

Housing Location and Affordability

The PSVLP fails to give due consideration to the type of houses proposed, and the location of them within the Borough.

- Developer interest in the South of the Borough is clearly based on the extremely high house prices in the area, generally in excess of £400,000. Given the average wages of those who work within Warrington borough would not support this kind of property value, surely these simply become houses for those commuting elsewhere. They will certainly not be affordable to those working in the distribution economy which the Council seems so wedded to. In recent times, an "affordable" house in this part of town has been around £250,000. Given the level of infrastructure which would be needed to support their development, houses within this proposed Garden suburb would need to be of significant value, beyond the means of local residents.

The fact that 80 % of proposed Greenbelt release in the plan is within the South of Warrington, is surely an indication as to where developers see their profit coming from, whilst the Council fails to give due consideration to the long term effects. Indeed there are numerous research sources which suggest that by releasing greenbelt land we are simply releasing more profitable land for developers. This is not what the existing residents of Warrington need.

Again, the Council's motivations behind these proposals are questionable given their commercial relationships and involvement with the developers and other agencies involved in promoting profitable residential development. Any Inquiry into this PSVLP needs to include a robust assessment of the relationship between the key organisations and individuals involved.

- I would further comment that the PSVLP makes almost no mention of any improvements or redevelopments required in the existing suburbs, particularly in the north of the town where there are neighbourhoods and housing stock in need of much regeneration. Concentration of effort in these areas and on the significant supply of brownfield land would far better deliver some of the strategic objectives of the draft Local Plan

For the above reasons, I consider the housing location and affordability proposals contained within the proposed plan are NOT SOUND, JUSTIFIED OR LIKELY TO MEET THE CURRENT NEEDS of the town and its residents.

Policy DEV4 – Economic growth and development

I believe that the PSVLP places an over reliance on the development of large scale distribution sheds. We are all aware of the ever increasing automation of such facilities, and the relatively low number of jobs they generate, especially permanent, good quality well paid jobs. It appears that the Omega development in the north of the Borough promised to deliver 24,000 jobs before development. When

the next phase at Mount Park was proposed, it claimed that Omega had created 7,000 - somewhat of a discrepancy. There is a lack of evidence to support the anticipated job numbers outlined in the proposed plan.

This level of automation will only increase over time and there will be a point when the Council has used all its land in developing distribution warehousing which only generates profit for developers and offers nothing to the sustainability and wellbeing of local residents.

Many residents already travel outside of the Borough to work, as there is very little diversity or opportunity in Warrington in alternative sectors. Likewise when people become dependent on a less than ideal employment offered by the large distribution sheds, there is no alternative when the sector further reduces the number of employees they need. These much broader and long term needs are not recognised by the Council appropriately in the draft Local Plan.

There is also a significant amount of available large warehousing space within the borough already – vacant units at Omega for example. I consider that the plan also fails to take into account the development of such units in neighbouring boroughs. The Florida Farm development, and others in St. Helens for example, make a massive contribution to available space. I consider that the PSVLP fails to take account of the accommodation being developed elsewhere.

Two massive applications for distribution accommodation within the greenbelt have recently been received by the Council and are currently being considered. These need to be considered together and within the context of the emerging plan. To that end, they should be deemed premature. There is however a clear relationship between the developers promoting these schemes and the Council, both having interests in WIRE regeneration. The fact that these developments have not been included within the draft local plan, shows that the Council has not given due consideration to all relevant factors in preparing the plan.

Given the politically and economically uncertain time the country will face over the coming years, I would also suggest the proposed plan is a clear demonstration of a Council putting “all its eggs in one basket”. Given it appears to be putting its own commercial interests and short term-ism over the genuine needs, concerns and sustainable future of its residents, I consider that the draft plan has been NOT BEEN POSITIVELY PREPARED.

OBJECTIVE W2: TO ENSURE WARRINGTON’S REVISED GREEN BELT BOUNDARIES MAINTAIN THE PERMANENCE OF THE GREEN BELT IN THE LONG TERM.

Policy GB1 – Greenbelt

I consider that the Council’s proposals for removing over 11% of the Borough’s greenbelt land from the critical protection measures offered by such a designation is fundamentally flawed, contrary to national policy and against the wishes of the large proportion of local residents who objected to these proposals in previous rounds of consultation. I do not believe the Council’s proposals represent a sensitive release of greenbelt land, or ensures its permanence as suggested by Policy GB1. As such I therefore consider that the proposals relating to the greenbelt under Policy GB1 and others within the PSVLP are NOT JUSTIFIED, NOT POSITIVELY PREPARED and are UNSOUND for the following reasons:

- I do not agree that the Council's proposals represent a sensitive release of greenbelt land, or ensures that it maintains its permanence as it suggests. I believe that the proposals will actually have the opposite effect, destroying character and local distinctiveness, the countryside and Warrington's unique pattern of green spaces whilst failing to protect, enhance or embrace natural assets.
- The plan includes significant loss of greenbelt land without providing evidence of exceptional circumstances for such release or fully considering alternative brownfield sites which will become available during the lifetime of the plan. For example, the proposals fail to take on board that the Fiddlers Ferry will become available for development during the lifetime of the plan, and yet has not been considered as a potential development site within the plan, whether for residential or commercial development. The probability of this happening has been common knowledge for a considerable period of time, and this last week there was an announcement confirming the site will be closed. This is a very large, brownfield site which I believe the Council is negligent in not including in the PSVLP, as an alternative to the loss of greenbelt at the levels they are proposing. Without comprehensively including available brownfield land, I consider the Council cannot justify the release of such significant amounts of greenbelt land.
- The Council's assessment of the value of greenbelt land was produced by Arup. Arup continues to work with the Council and developers promoting schemes on the greenbelt land and advising on those schemes. I am therefore concerned about the rigor which has been applied in preparing that assessment, given that Arup has determined the greenbelt land in South Warrington to be of low value. I therefore consider that a robust challenge of this assessment is required. It underpins policies within the Local Plan (eg MD2) and yet I do not consider it has been an independent and robustly defensible assessment. I therefore consider it is disingenuous at best for the assessment of value of greenbelt sites in Warrington to have been prepared by a consultancy with such close working relationship with an organisation actively seeking the release of greenbelt land for development.
- 80% of proposed greenbelt loss is in the south of the Borough. There does not appear to be a robust justification for this and again, this appears to be contradictory with other proposals in the plan. That greenbelt is precisely what gives the area its unique character and distinctiveness – factors which are promoted in the plan and make the area an attractive place to live. Yet, the Council seeks to remove a massive amount of land from this critical protection in this distinct area and decimate its wellbeing value in the broadest sense – value to local communities, to the environment, to the quality of place, to long term sustainability in terms of food supply, air quality etc.
- The environmental value of individual parcels of land is not the primary concern of greenbelt policy. As set out in Paragraphs 79 & 80 of the National Planning Policy Framework (NPPF) the fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open, to prevent settlements merging into one another, safeguard the countryside from encroachment, preserve the setting and character of towns and to encourage the recycling of brownfield land.

- I consider that the Council's Greenbelt Assessment fails to assess the value of the greenbelt as a whole, but simply assesses individual parcels of land. I therefore believe that the cumulative effect will be catastrophic for Warrington in relation to the aims of the NPPF.
- Much of the greenbelt land included within the Council's assessment is currently within agricultural use. This is a vital economic resource for food security and soil protection. It makes a valuable contribution in terms of food production and the sense of well-being an agricultural landscape can provide. In the face of climate change, agricultural land also has an increasingly important role in relation to carbon storage and flood prevention. I consider that the Council has failed to take these cumulative impacts into account in assessing the value of Warrington's greenbelt.
- Loss of huge swathes of greenbelt land in South Warrington will do little to impact on the quality of life for residents in the north of the town and be detrimental to those in the south. I therefore strongly disagree with the south/north bias of the proposed Plan and its failure to improve quality of life for all residents whether in the north or south of the town and consider that this unexplained imbalance means the proposals are NOT POSITIVELY PREPARED or JUSTIFIED.
- The proposed PSVLP states that it seeks to improve quality of life for existing residents. The existing greenbelt, open spaces, rural lanes, footpaths/cycle ways and woodlands are greatly valued by existing residents for the opportunities they provide. They provide opportunities for physical exercise, sustainable routes and easily accessible recreation, both of which contribute to overall health and well-being. The National Ecosystem Assessment supports the notion that simply seeing an agricultural landscape can contribute to health and well-being. That landscape also contributes to carbon storage, flood water retention and mitigation of poor air quality – something Warrington already scores comparatively very poorly on and which adversely impacts existing communities. I strongly disagree that the loss of greenbelt will make any positive contribution to this and believe that the proposals are therefore not a justified means to delivering the aims of the Plan and are therefore UNSOUND.
- The Council's proposals states that it seeks to protect, enhance and embrace natural assets, maintaining Warrington's countryside and unique pattern of green spaces. I strongly disagree that releasing large areas of greenbelt land for development will achieve this, rather it will do significant damage. The green environs around Warrington should be preserved and protected to maintain the unique rural, setting and characteristics of South Warrington and its distinct communities and prevent urban sprawl. I therefore consider that the proposals are NOT A JUSTIFIED means to delivering the aims of the plan.
- Planning policy at a national level, as supported by the Government and Secretary of State in various statements and other documents, determines that the protection and retention of greenbelt is critical and proposals to release land should demonstrate "exceptional circumstances". It also shows that housing and economic needs do not generally override constraints on the use of Green Belt land. I consider that the Council's proposals has clearly put the emphasis on housing and economic growth overriding all other factors including environmental concerns, quality of life and the health and well-being of existing residents etc. It has also failed to demonstrate exceptional circumstances for its proposed release of land from

greenbelt. I strongly disagree with this approach and consider that this is contrary to national policy and hence the Council's approach to greenbelt in the PSVLP is UNSOUND.

- The proposals make limited mention of any improvements or redevelopments required in the existing suburbs, particularly in the north of the town where there are neighbourhoods and housing stock in need of much regeneration. Concentration of effort in these areas and on the significant supply of brownfield land would far better deliver some of the strategic objectives of the draft Local Plan. I therefore would strongly disagree with the Council promoting massive, unaffordable and unattractive housing growth on greenbelt land at this at excessive social and environmental cost, a proposal I consider to be UNSOUND and UNJUSTIFIED.

In light of all the comments above, I do not consider that the Council has demonstrated the required "exceptional circumstances" required to justify the release of this amount of land from greenbelt designation and accordingly the proposed plan is UNSOUND and UNJUSTIFIABLE.

OBJECTIVE W4: TO PROVIDE NEW INFRASTRUCTURE AND SERVICES TO SUPPORT WARRINGTON'S GROWTH; ADDRESS CONGESTION; PROMOTE SAFER AND MORE SUSTAINABLE TRAVEL; AND ENCOURAGE ACTIVE AND HEALTHY LIFESTYLES.

Policy INF1 – Sustainable Travel and Transport; Policy INF2 - Transport Safeguarding; and, Policy INF5 - Delivering Infrastructure.

Strategic Objective W4 of the proposed plan states that the Council seeks to provide new infrastructure to support growth, reduce congestion and promote sustainable transport options, whilst reducing the need to travel. Although I am supportive of the aims of Strategic Objective W4 as written, I do not agree that the proposed policies will deliver these aims.

Furthermore, the PSVLP omits details of the huge traffic and transportation issues and implications for the town, as does the 4th Local Transport Plan which is being consulted on separately and concurrently with this consultation. Throughout the consultation process there has been a lack of clarity and consistency from Council Officers at all levels and, on occasions, blatant contradiction.

Accordingly I believe Policy INF1 to be UNSOUND for the following reasons.

- I strongly object to the need for a new network of distributor roads at the scale implied by the proposals to support new housing development on such a scale as envisaged. As outlined in section 3) above, I consider the Council's assessment of housing need and proposed commercial development to be excessive and hence I also strongly disagree with the level of infrastructure the draft policies require to support this. I therefore feel the basis for this policy is UNJUSTIFIED AND NOT POSITVELY PREPARED.
- I strongly object to the lack of detailed plans and incomplete or conflicting information contained within the various ongoing consultations currently. I also feel that the conflicting and poor quality plans prepared by the Council have led to confusion, lack of clarity and general distrust. The lack consultation with groups such as Sustrans and the TPP for example has heightened this.

- The document states that a new high-level connection across the Manchester Ship Canal “may” be needed in order to achieve the “full development potential” of the area. How can the Council justifiably promote Local Plan policies of such excessive growth and with such a huge impact without a degree of certainty over the possibility, feasibility and viability of key infrastructure needed to support it? Again, I therefore feel the basis for this policy is UNJUSTIFIED AND NOT POSITVELY PREPARED.
- I consider that the proposed policy concentrates on supporting new growth rather than the need to improve the quality of life for existing residents. Strategic Objective W4 talks about new infrastructure to support growth and reduce congestion, but it is difficult to see how a massive increase in the number of house and large scale developments in the town can significantly reduce congestion, especially when taken in the context of likely additional traffic generated by the opening of the new Runcorn Bridge and the introduction of the toll charge.
- Investment in infrastructure should be used to improve the lives of existing residents and yet the proposed policies seem to concentrate only on the provision of new infrastructure to “open up” opportunities for growth. This simply compounds the problem as the net effect will be “no change” - any improvements will be negated by additional development. I therefore consider that this policy has not been POSTIVELY PREPARED and will NOT DELIVER the stated aims of the policy.
- I am deeply concerned about the Council’s apparent failure to acknowledge that a significant proportion of people living in the proposed new homes in South Warrington are likely to commute out of town for work given the proximity of the major motorway junctions. There are already significant issues with approaching the motorway at peak hours, not necessarily as a result of the existing road network leading to it but simply because of the capacity of the motorways to receive additional traffic. This is especially true of the M6/M56 junction and is something outside the remit of Warrington Borough Council. With the situation currently already at breaking point, significant widening and traffic works having been completed on the M6, I consider the Council is simply choosing to ignore the bigger issue when promoting massive growth and development. On this basis I consider this policy in UNDELIVERABLE within the constraints outside of the Council’s control.
- It appears that the principle underlying the policy is that not only will new roads be needed to support growth but that building new roads will “make things better” for everyone.

There has been significant research over the years which has demonstrated that more road capacity leads to more road traffic. The Transport for Quality of Life (TfQL) report *The Impact of Road Projects in England* researched the impacts of completed new road schemes and compiled a significant body of evidence to demonstrate that new road schemes:

- generate additional traffic, often far over and above background trends over the longer term;
- lead to significant and permanent landscape and environmental damage; and
- show little economic benefit to local economies.

There is no evidence within the Council's proposals to suggest these factors have even been considered and again the Council is not being driven by existing local needs. I am therefore concerned that Warrington faces a dead-end of increasing traffic, increasing congestion, unnecessary environmental damage, and increasing urban sprawl which is as bad for productivity as it is for quality of life. I therefore consider that this policy has not been POSTIVELY PREPARED and will NOT DELIVER the stated aims of the policy.

- I strongly object to the lack of consideration given to the environmental, ecological and heritage implications of new road infrastructure and the need for new crossings over the Bridgewater and Manchester Ship Canals this would require. The Bridgewater and Manchester Ship Canals are both of important heritage assets which generate physical, environmental, economic and social benefits, contributing to the health and well-being of local communities and local character and distinctiveness.
- I strongly object to the impact of proposed road schemes and/or bridge crossings on existing residents whose properties will be adjacent to these proposed strategic links. There will be harmful health effects as a result of increased air, light and noise pollution, as well as significant impact on quality of life. There will also be a significant economic impact on individual households as a result of this. Indeed, many are already seeing their properties blighted by the uncertainty, this in itself can be a key contributor to health and well-being issues and the Council needs to be fully responsible this when promoting "growth at all costs policies".
- Costs of the infrastructure required to support the Council's unrealistic proposals and targets have been significantly underestimated based on the publicly available information. The Council has not been able to provide a robust scope of the works it believes are required, nor a detailed cost or funding plan. Although there may be some developer contributions made, these will not be sufficient to support everything the Council is intimating, and there are no other sources identified in this ever shrinking world of public funding. I therefore consider that the plan is UNDELIVERABLE for cost issues.
- There is no discussion around phasing of infrastructure development and I consider it critical that any major infrastructure works are in place before the Borough may be inundated by the 18,000 additional homes and millions of square feet of logistics floorspace the Council is seeking. If dual carriageways and high level bridges are needed to handle this then they should be in place in advance of any development to avoid complete melt down of the existing broken networks. The plan fails to address this realistically and in a way which could be enforced. A detailed inquiry into the robustness of the proposals for infrastructure provision is required as it appears the Council is keen to let its development partners get on with developing and worry about the consequences later when it is far harder to enforce.

For all of the above reasons I consider policies INF1 to be UN SOUND, UNJUSTIFIED AND UNDELIVERABLE.

Policy INF4 - Community Facilities

The proposals fail to take on board the need for a new hospital. This is a critical piece of infrastructure in the future of the town. Current facilities are obsolete and again, it has been a point of public record for some time that they need to be replaced. The proposals in the draft local plan, make no reference to this and yet it is openly being talked about by the authorities that they plan to relocate facilities to the south of the Borough, again with a massive land take from greenbelt.

I consider that by not taking account of this need in the plan, the Council has failed to objectively assess need. Furthermore, GPs in the town are on public record as stating they are against relocation of hospital facilities to the South of town saying will moving primary health care away from centres will lead to increased ambulance usage and pressures on emergency services as well as increasing health inequalities across the town

Significant development, needs to be in place before any development on the scale being put forward by the council is implemented, or else lives will be put at risk and an already over stretched facility will be unable to cope. I therefore believe that by not including proposals to support the envisaged development, the plan is UNSOUND.

OBJECTIVE W5: TO SECURE HIGH QUALITY DESIGN WHICH REINFORCES THE CHARACTER AND LOCAL DISTINCTIVENESS OF WARRINGTON'S URBAN AREA, ITS COUNTRYSIDE, ITS UNIQUE PATTERN OF WATERWAYS AND GREEN SPACES AND ITS CONSTITUENT SETTLEMENTS WHILST PROTECTING, ENHANCING AND EMBRACING THE BOROUGH'S HISTORIC, CULTURAL, BUILT AND NATURAL ASSETS.

Policy DC1 - Warrington's Places

I consider that Policy DC1 fails to offer any protection to the valuable quality places which can currently be found in Warrington and is therefore UNSOUND for the following reasons:

- The semi rural nature of the southern suburbs makes a unique contribution to the character of the Borough and the distinct settlements within it have their own unique communities and places. Policy DC1 fails to recognise these.
- Policy DC1 fails to recognise the unique assets of the Bridgewater Canal and the Trans Pennine Trail in contributing to the distinctiveness of Warrington and key places.
- Policy DC1 fails to recognise the contribution of the public footpath network in the greenbelt of South Warrington as a unique and special place and offers no protection (unsurprisingly given the Council's preference to destroy many hectares of greenbelt in this area).
- One of the key purposes of greenbelt is to prevent urban sprawl and protect the distinctiveness of local places. The policy makes no reference or mitigation for the loss of that greenbelt in this regard.
- The Policy makes reference to the opening up of Warrington Waterfront – the location of Port Warrington which will bring massive additional vehicle movements daily, huge amounts of

additional pollutants associated with both road and water based freight transportation. I fail to see how this will create a quality place for those the Council hopes will live nearby.

For all these reasons, I consider that policy DC1 is UNSOUND.

Policy DC3 – Green Infrastructure and Policy DC4 - Ecological Network

Policy DC3 sets out the Council’s aspiration to protect, enhance and extend the existing green infrastructure network in order to maintain and develop the wider public health, active travel, flood management, climate change, ecological and economic benefits it provides. Given the scope and extent of the “growth agenda” being promoted by the Council through the PSVLP, this cannot possibly be achieved.

- Although the Council’s PDO proposals talk about the provision of new green spaces and linkages within the key development areas, especially within the proposed Garden Suburb, huge swathes of open or agricultural land, mature trees, ancient woodland, hedgerows, mature road verges etc will disappear as a result of development. Man-made, “value engineered” alternatives will go no way to replacing these and our ecosystems and sustainability will suffer as a result.
- The proposed policy talks about access to greenspace for all and yet for the people of South Warrington this access will be significantly reduced if the Council’s plans go ahead, decimating the natural habitat and replacing it with a man-made country park.
- By what definition can developing the land in picture a) below and creating some green space akin to picture b) be better for any of the reasons the Council says it is seeking to achieve?



Picture a)



Picture b)

How can the bottom picture below be any better for natural habitat, access to open space etc than the top picture?



I strongly object to the massive damage the Council's PDO proposals would inflict on local flora and fauna, through the significant loss of, and damage to, habitat and the stifling of biodiversity. Warrington has unique assets, both within the urban area such as the TPT or the Bridgewater Canals as well as in the semi-rural and rural areas around it. The town should embrace these and use them as its unique selling point – not seek to destroy them so it can accommodate sprawl and look like everywhere else. It is impossible to provide genuine alternatives and replacements through the Council's proposals, let alone the enhancements it allegedly seeks to achieve.

For the reasons set out above, I consider that the proposals set out above are UNSOUND and will NOT DELIVER THE STATED OBJECTIVES of the plan.

Policy DC6 - Quality of Place

I am fully supportive of the need to impose a set of design principles to ensure a high quality of development and ensure spaces which are attractive, sustainable and where people want to be, and yet at the same time retain their own unique character which makes the settlements of Warrington unique. However, I do not consider that Policy DC6 will deliver this.

Once again the policy does not look at the overall cumulative effect of individual schemes on the Borough. I chose to live where I do because of the community feel, the attractive and distinct location and the fact that it was different to other places. If I wanted to live in the midst of nearly 8000 brand new, nearly identical houses on faceless estates I could have done so far less expensively and more attractively with less congestion in Borough's elsewhere. I don't work in Warrington and made a positive choice to be here. Faceless, lazy architecture and landscape design might be expected for small, infill developments, albeit not excusable. However, on the massive scale the Council is proposing here, this Policy needs to be much stronger and far more robustly evidenced. It needs to take account of existing assets – such as the canals, ancient woodland, greenbelt etc and not simply try to find ways of hiding the damage. Otherwise, Warrington will turn itself into the "Milton Keynes" of the north west with mile after mile of faceless housing and indistinguishable settlements and road networks.

One of the key purposes of greenbelt is to prevent urban sprawl and the merging of settlements. The loss of greenbelt in South Warrington particularly and the creation of a new garden suburb will simply obliterate the boundaries between settlements such as Grappenhall, Stretton and Appleton Thorn, creating one massive anonymous suburb which in effect will comprise of small estates and isolated communities.

For the reasons above I consider that Policy DC6 is UNSOUND and will NOT DELIVER THE STATED OBJECTIVES.

OBJECTIVE W6: TO MINIMISE THE IMPACT OF DEVELOPMENT ON THE ENVIRONMENT THROUGH THE PRUDENT USE OF RESOURCES AND ENSURING DEVELOPMENT IS ENERGY EFFICIENT, SAFE AND RESILIENT TO CLIMATE CHANGE AND MAKES A POSITIVE CONTRIBUTION TO IMPROVING WARRINGTON'S AIR QUALITY.

Policy ENV2 - Flood Risk and Water Management

Areas of Warrington already suffer significant issues as a result of inadequate drainage and water management and parts of the road network become unpassable at times. These are areas outside of flood risk zones and the issues are therefore solely attributable to the capacity of the drainage network. I consider that Policy ENV2 fails to consider the existing needs of the town, not just the implications of new development and therefore I consider it to be UNSOUND for the following reasons.

- Development on the scale envisaged by the consultation options will have significant impact on surface water drainage across the town. Heavy rain showers already lead to flooded roads in South Warrington and as a resident I often have to find an alternative route around them. Drainage and sewer capacity would obviously be fundamental to new residential development, but developers will be seeking to provide new to enable their own schemes to the required level, not resolving the existing issues across the town. I therefore question the capacity of the existing system.
- I am deeply concerned as to where surface water drainage from new large scale development would go. Perhaps this is another commercial opportunity to charge for drainage into the Bridgewater and Manchester Ship Canals? The Council has not presented any capacity information or analysis as part of the consultation. There are two small brooks running through Thelwall which are shown on the Environment Agency Flood Maps as “main rivers” and I do not believe the Council should be promoting activity which would increase run off into these watercourses.
- I strongly object to the implications of removing such a significant amount of land from green belt for development, in terms of water storage and flooding and the creation of additional run off. Many of the fields in the greenbelt to the south of the town remain water logged for days after normal periods of rain, without the additions of massive areas of hard surfaced development and infrastructure. As outlined in Section 3) above, I consider the cumulative effect of the

development of so much open land will cumulatively have a catastrophic impact on flooding and drainage and the Council is derelict in its duty to existing residents, communities and businesses in promoting such schemes.

- I further note that the Environment Agency has recently completed millions of pounds worth of flood defence works to protect Warrington from river flooding along the Mersey valley. These works will not have considered the effect of thousands of new homes and the loss of many hectares of open land. Although many of the sites identified within the Council PDO proposals are not situated themselves within an area of high flood risk, it is difficult to see how the run off from them cannot cause issues for flooding and drainage elsewhere.

For all of the above reasons, I consider that Policy ENV2 will not result in the stated objectives of the council nor do they take of account of existing needs – again being led solely by the perceived need for “growth”. To that end, I consider the Policy to be UNSOUND, UNJUSTIFIED and UNDELIVERABLE.

Policy ENV8 - Environmental and Amenity Protection

Air quality

Proposed Policy ENV8 states that “the Council will seek to ensure that proposals for new development will not have an unacceptable negative impact on air quality”. Given the scale of growth promoted by the Council elsewhere in this PSVLP it is impossible to see how the cumulative effect of all this new development cannot have a detrimental impact. I therefore consider that the Council’s proposals for air quality under Policy ENV8 are UNSOUND for the following reasons.

- I am deeply concerned about the impact of an expanded road network and increased traffic on Warrington’s air quality and to the lack of information within the consultation document. A massive increase in vehicle movements is inevitable, as is the massive increase in road congestion and standing traffic which research has shown has a massive impact on air quality.
- According to information from the Council’s website, in 2015, the Council’s own air quality monitoring found that 60% of the 47 sites monitored for air quality had Nitrous Oxide pollution in excess of their target levels. This represented a significant increase from 17% of sites the previous year. In 2016 the World Health Organisation said that Warrington was the second worst place in the North West for breaching air pollution levels. This clearly indicates a reliance on road traffic throughout an area surrounded by three motorways, even with our greenbelt in place. Without this greenbelt and with an increased level of traffic and congestion, it is likely that air quality will worsen across the town as a result of the Council’s proposals.
- Air pollution is recognised as having harmful effects on human health, the economy and the environment. It can impact on everyday life, affects everyone and can significantly increase pressure on local NHS services. In 2013 it is estimated that 4.8% of all deaths in Warrington were caused by manmade particulate pollution. This is above the regional average. If this number of deaths were caused in some other way, there would be outcry and the Council would be doing everything it could to reduce this number, not adding to the problem as appears to be the case here.

- Air pollution is not only recognised as being harmful to human health, but as having an adverse impact on local ecology too. It can be directly harmful to the health of other species and cause significant damage to their habitats and food supplies. It can also be detrimental to the human food chain. I therefore strongly object to any proposals which will make Warrington's position regarding air pollution either worse or maintain the current situation. This is unfair to all existing residents.
- Despite the PSVLP promoting Port Warrington as a multimodal transport hub and a way of reducing emissions, it fails to recognise that despite its "green perception" cargo ships are one of the worst polluters, contributing carbon dioxide, nitrous oxide and sulphuric oxide into the environment at a harmful level. For the most part, this is never seen as ships are far out at sea and the consequences never felt. When ships are brought into a town centre and through residential areas, the effect has far more direct implications. Especially when considered in conjunction with all the additional HGV movements required to support it. Research from the IMO and others has shown that the smaller ships (such as those which might use the Ship Canal through Warrington) are proportionately worse as they contribute more pollutants per unit transported.
- The proposed policy only seems concerned with the incremental impacts of individual developments, rather than the cumulative effect of the whole. The future of the town needs to be looked at holistically in relation to air quality, and individual schemes, however large or small, must not be allowed to worsen the situation by "stealth" unconstrained by any Local Plan.

Having regard to all of the above, I therefore consider that although the Council's stated aims for regarding air pollution are sound, the policies they are proposing in the PSVLP are in contradiction to this and as such will not deliver those stated aims, simply making the situation worse. To that end, Policy ENV8 is UNDELIVERABLE, UNJUSTIFIABLE, NOT POSITIVELY PREPARED and therefore UNSOUND.

Light pollution

Policy ENV8 fails to consider the implications of light pollution and the detrimental impact excessive urban growth will have on this. I consider that the Council is negligent in not considering the implications of this in the PSVLP and therefore the Policy is UNSOUND.

- Light pollution refers to artificial light where it is neither wanted nor needed. Research by the Council for the Protection of Rural England (CPRE) has found that light pollution can cause significant distress to humans, including disruption to sleep patterns and production of melatonin. There is also increasing awareness of the impact that light pollution can have on wildlife, including migration, reproduction and feeding patterns and those species we think of as being nocturnal.
- The CPRE's Nightblight maps show the level of radiance shining up into the night sky and categorises this in to broad colour bands on a scale of "darkest" to "brightest". The map for Warrington shows that there are no areas in the darkest three categories, whilst the proportion of sky in the three brightest categories is over double the average for Cheshire and even higher when compared to regional and national figures.

- Warrington already therefore performs poorly in terms of light pollution. It is clearly visible from the maps that the darker areas of the town are around the southern and eastern boundaries. Excessive urban expansion into these areas will significantly increase light pollution in these areas (as well as additional light pollution from vehicles) and I am DEEPLY CONCERNED about the negative effect this will have on residents and wildlife. Almost 20,000 new homes will clearly impact on this along with the lighting required on new access roads etc. Perhaps of most significant impact however, will be the development of millions of square feet of commercial space, continuously operational and fully artificially lit throughout the night. The impact is particularly great in the south of Warrington where development is proposed along the ridge of the Mersey Valley and hence visible for some considerable distance.
- The policy does state that the Council may consider the use of planning conditions for schemes where this may be an issue, but I do not consider that this is a strong enough protection to meet the stated aims of the policy, especially as the Council is a key promoter in some of the schemes which are likely to be the worst contributors.
- This extremely limited policy of protection also fails to take into consideration the cumulative effect of all developments across the plan period, dealing only with individual instances.

For all of the above reasons, I consider Policy ENV8 to be UNSOUND and incomplete by not considering the implications of light pollution.

Noise pollution

I do not consider that Policy ENV8 gives fully considers the implications of noise pollution and the detrimental impact excessive urban growth will have on this. I consider that the Council is negligent in not considering the implications of this in the PSVLP and therefore the Policy is UNSOUND.

- The proposed policy only seems concerned with the incremental impacts of individual developments, rather than the cumulative effect of the whole. The future of the town needs to be looked at holistically in relation to noise pollution, and individual schemes, however large or small, must not be allowed to worsen the situation by “stealth” unconstrained by any Local Plan.
- I strongly object to the very limited consideration the PSVLP has given to issue of noise pollution and the detrimental impact of excessive urban growth and development of new strategic road links, bridge crossings etc will have on this. Noise pollution can cause significant distress to humans, their sleep patterns and their health and well-being, as well as having a detrimental effect on wildlife.

SITE ALLOCATIONS

Policy MD2 - Warrington Garden Suburb

I consider that the Council’s proposals within Policy MD2 are UNDELIVRABLE, UNJUSTIFIED, CONTRARY TO NATIONAL POLICY and have NOT been POSITIVELY PREPARED and are hence UNSOUND for a large

number of reasons. Many of these I have explained in previous sections of this objection letter as each individual element is contrary to the objectives of different policy areas. In summary however, these include:

- The removal of huge swathes of land in South Warrington from Greenbelt protection without robustly evidencing the need to do so contrary to national policy.
- The excessively high target housing numbers being proposed by the Council. I believe a more realistic and less politically minded assessment would result in a far lower loss of greenbelt land and a much higher proportion of houses being provided across the Borough on brownfield land.
- The poor quality of the Greenbelt assessment undertaken and its use to fit the purposes of the Council and its development partners, rather than an independent piece of work.
- The excessive amount of housing proposed for delivery in the area which will not address the needs of the existing residents in anyway and create anonymous, low density, car dependent, expensive housing where high profits can be generated by the “one size fits all” volume house builders.
- The loss of Warrington’s greenbelt to become a dumping ground for the housing “needs” which neighbouring authorities don’t wish to accommodate ie the proposals for a greater Cheshire sub region which the Council have used as a justification for higher housing targets during the consultation process.
- Given the level of infrastructure which would be needed to support their development, houses within this proposed Garden City suburb would need to be of significant value, beyond the means of local residents. There are numerous research sources which suggest that by releasing greenbelt land we are simply releasing more profitable land for developers. This is not what the existing residents of Warrington need.
- The failure of the Council to recognise that it is the motorway network in the region which is at capacity and no amount of tinkering around the edges with a link road here, better junctions there can address this – leading to worsening traffic congestion, pollution etc
- The massive increase in carbon emissions and other pollution through thousands of additional daily vehicle movements, both HGV and car.
- The proposal of massive logistics / commercial units simply because of relative proximity of a motorway junction at the expense of everything else which makes this area special and worthy of protection.
- The loss of greenbelt land to promote development which will create limited employment opportunities, and not jobs which will make houses in the area affordable to those who work there.
- A lack of detailed and robust infrastructure planning to support the excessive growth envisaged. Hence a lack of realistic cost implications which makes one question the viability and deliverability

of such infrastructure and fear the likely consequences of such development on the proposed scale.

- The implications of additional infrastructure required on other areas of the town or areas outside of Warrington's control.
- From the limited information and numbers provided, it is pretty obvious that this will be far removed from the original Garden City ideals and it is at best disingenuous to try to disguise mass housebuilding as such.
- Loss of habitat, biodiversity and ecological assets, replacing established high quality assets with low level, "man made" ones and a failure to protect the existing value of them.
- The destruction of the character and unique assets of south Warrington and the local communities in existing distinct settlements.
- The failure to prevent urban sprawl.
- Over 80% of greenbelt land to be lost in the south of the Borough.
- The loss of valuable farmland and the short sighted nature of this in terms of food sufficiency and the loss of green land for soil carbon storage, soil quality and the negative impact on ecosystems and food security and productivity.

On the basis of these reasons I consider that the Council's proposals within Policy MD2 are UNDELIVRABLE, UNJUSTIFIED, CONTRARY TO NATIONAL POLICY and have NOT been POSITIVELY PREPARED and are hence UNSOUND.

OTHER MATTERS

Agriculture

I strongly object to the fact that the Council does not appear to have given any consideration as to the implications of the loss of agricultural land and greenbelt for soil carbon storage, soil quality and the negative impact on ecosystems and food security and productivity.

These issues are not given any consideration within the consultation document as far as I can see and yet should be a fundamental consideration when considering the loss of greenbelt and the use of greenfield land for development. Its omission makes the PSVLP UNSOUND in my opinion.

Consistent with national policy

I believe that the contents of the PSVLP are inconsistent with national policy in a number of key areas.

- Government policy within the NPPF is to protect land within the greenbelt unless exceptional circumstances can be demonstrated to support its removal. I do not consider the PSVLP has demonstrated any exceptional circumstances to justify the loss of greenbelt at anywhere near the scale the council is proposing.
- Government policy is that targets for housing numbers should be set locally and that the Council's threats that if they don't get their way, central government will take over and the Council will lose control. From what I have read, and the correspondence from government which has been made public to residents does not support this hollow threat.
- Government has made a commitment to "zero carbon" by 2050. The PSVLP proposes decimating greenbelt and creating massive road transport based logistics sheds, inland port facilities and thousands of car dependent houses, all of which are far from carbon neutral. Likewise, the PSVLP policies will reduce the amount of agricultural land, negatively impacting on issues such as soil carbon storage, soil quality and the negative impact on ecosystems and food security and productivity.
- The concept of health and wellbeing is central in many areas of government policy but it is difficult to see how the Council's proposals to remove greenspace, increase vehicle movements, worsen air pollution will help deliver this in anyway. Taken in conjunction with the failure to provide affordable housing in the appropriate location, quality jobs and community infrastructure, this seems to be a plan designed to make life worse or more difficult for everyone except landowners, developers and the Council, all of whom stand to benefit financially.

On the basis of the above, I consider the contents of the PSVLP are NOT CONSISTENT WITH NATIONAL POLICY.

Plan period

Given the uncertainty of the current political and economic climate, the Council has not provided any justifiable reason as to why it has sought to prepare a 20 year plan instead of a 15 year plan.

Local Democracy

There are several points I would like to make here which I consider make this PSVLP UNSOUND.

- There are existing Neighbourhood Plans in place with which this PSVLP is not consistent.
- Throughout the Local Plan process so far, the Council has behaved appallingly in my view. They may have done what is required of them on paper – consultation events etc – but the spirit in which it has been done has been disingenuous, at times confrontational and seemingly aimed at making life difficult for those who wish to take part in the process and have a say in the future of their home.

For example, there has been contradictory information coming from different council officers and elected members; a distinct lack of respect from certain councillors towards those who are concerned; the Council's website has been unable to cope with the level of demand to access it;

documents have therefore not always been available due to website difficulties; online response forms are designed to time people out after a few minutes making it hard for people to respond etc.

- Over 4,500 people responded to the last consultation on the Local Plan, and yet the Council have failed to take their comments on board. The changes made between that consultation on the preferred option and this PSVLP are minimal and as a resident I feel the Council are not listening to their residents at all and are putting excessive growth ahead of meeting the needs of existing residents.
- The consultation on two separate but massive logistics warehouse applications over the last couple of months, coupled with this consultation on the Local Plan and the supporting transport plan, means that many residents feel under siege, disillusioned and have spent huge amounts of time in preparing their responses. There has been no comment from the Council as to why these two applications were not treated as premature in relation to the Local Plan as neither feature within it.

CONCLUSION

This is a long letter and I have found it difficult to put my thoughts into the appropriate words – the system works against residents without specialist knowledge in many areas. I do trust however that this does not mean our voices will not be heard, and that you will give due consideration to all of my comments above.

I am sure others have made similar comments and I am fearful of what our town and our quality of life will become if this ambition for excessive growth is allowed to go unchecked.

Yours faithfully

VICTORIA JOHNSON