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The [National Planning Policy Framework](#) (NPPF) and the [2015 Conservative Manifesto](#) clearly state that Ministers attach great importance to the Green Belt and will maintain existing levels of protection. The NPPF also states that Green Belt boundaries should only be changed in a Local Plan under “exceptional circumstances” and only permit most forms of development in “very special circumstances”. But local authorities continue to interpret these rules in a far more lax manner than they should and indeed it appears Warrington Borough Council are following suit.

For 60 years, Green Belts have protected agricultural and other undeveloped land. By doing this they encourage the regeneration of previously developed or ‘brownfield’ land in urban areas. International comparisons suggest that without the strong protection Green Belts offer against many forms of development, much more farmland and woods would be consumed by urban sprawl, especially around large cities as being proposed in Warrington. Yet with the increasing global pressures from climate change and population growth, our farmland and woodlands will become more valuable in future, not less. In the face of climate change, the Green Belt is also likely to have an increasingly significant role in storing carbon and preventing flooding. The calls for more development in the Green Belt assume that this land is only valuable if built on, an assumption that is fundamentally flawed. The Green Belt is needed now more than ever.

Preventing sprawl, one of the key purposes of Green Belt policy, produces financial benefits to society by reducing the infrastructure and environmental costs associated with new development.

The projection of 1113 homes per year for 20 years is an extra 22,260 homes in Warrington. Let’s say each house has on average 3 occupants, that’s another 66,780 people in the town. According to the 2011 census the population was 202,200..... quite an increase! So if each house has 2 cars that’s an extra 44,520 cars.

Healthcare is mentioned several times in the PDO but presumably WBC are aware of Warrington CCG's financial position in that there is no resource for new healthcare whether that be the building or the manpower. There are no spare Doctors - fact.

I would also like to refer to [REDACTED] and The Stretton Residents Action Group objection which I wholeheartedly agree with and would like to also point out:

1. Green belt and Exceptional Circumstance - The National Planning Policy Framework (NPPF) Section 9, clauses 79 - 82 relating to the protection of the green belt, and under specific clause 83, states that green belt boundaries should not be altered unless by 'exceptional circumstances'. In addition, the Governments current White Paper entitled 'How to fix our broken housing market' further strongly supports the avoidance of using green belt land as, in part, defined by Annex clause A.61 which states: Therefore we propose to amend national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements , including:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;
- optimising the proposed density of development; and
- exploring whether other authorities can help to meet some of the identified development requirement. The basis for this first objection is that we believe that the preferred option proposed by WBC, which is in fact the second of three main options considered, has not fully demonstrated the requirements of the NPPF or the Governments definitions above in order to be able to claim exceptional circumstance, even in the light of substantial consultancy by WBC. Option 2, and indeed Option 1, is understood to be firmly driven by the aspiration of Warrington to become a city. As such, the economic and housing growth forecasts for the planned period proffered by consultants hinge around this aspiration, and to the detriment of green belt usage. The city concept, or vision, is viewed by many South Warrington residents, and probably a large section of Warrington residents, as unwarranted and not justified (see objection 3 below). It appears to be driven from the original WBC 'Warrington Means Business' WMB a home grown aspiration and vision by WBC and not a government driven directive. Therefore the creation of new sustainable communities taking up precious green belt land to meet this city vision cannot be classed as exceptional circumstances, it is an aspiration, not a need. Furthermore, if WBC lowered their sights a little then other options, including Option 3 and location sub option 5 could be a workable solution and possibly provide all the necessary inner Warrington development and improvements. This would allow housing requirements to be downsized

accordingly with a revised forecast for population and economic growth, thus negating the need to take up green belt.

2. Green belt review - It is considered that the recent Green Belt Review conducted by WBC consultants Ove Arup and partners, which has graded the whole of the Warrington area into 3 categories, to be subjective and biased to targeting South Warrington as a weak area and therefore erroneous. Albeit that arbitrary rules for grading were established it is considered that 3rd party consultant decisions as to the relevancy of the degree as to what constitutes contribution to the restriction of urban sprawl as being strong, intermediate or weak green belt is highly subjective and to classify them in this manner is wrong and is contrary to the original concept of a green belt. Green belt is green belt, to my knowledge it has never been sub classified and there appears to be no government ruling in the application of such a sub classification. To this point all areas should be treated equally. Therefore Area 10, which covers the proposed garden city suburb should not be regarded as having a weak contribution to the green belt. This classification is flawed and should not be used to target and destroy some of the most beautiful countryside and villages surrounding Warrington by the WBC aspiration for Warrington to become a city. Green belts are to prevent urban sprawl. The preferred option actually promotes urban sprawl by joining together the parishes of Hatton, Stretton, Appleton, Grappenhall and Lymm such that they will lose parish identity. This is entirely contrary to the ethos of green belts and should not be used as a basis for exceptional circumstance.

3. City Status - For a number of years Warrington has had an aspiration to gain and bid for City status culminating in the countrywide competition to celebrate our Monarch's Golden Jubilee. City status can only be awarded by royal decree. Warrington was unsuccessful in that bid and only five towns throughout the UK were granted City status by royal decree. Why, therefore, is Warrington still continuing to pursue the misguided goal of city status when it is highly likely that it cannot be attained? It is stated in the PDO that objective W1 is that the prime need is to change Warrington from a town to a city. This is now a flawed concept. This misguided aspiration and vision of city status appears to be firmly driving unrealistically high economic and population growth over the next 20 years. These unrealistic projections for disproportionate population growth would appear to be driving this need for additional housing, which WBC maintain can only be provided by the uptake of green belt land. This aspiration does not warrant or justify the need for WBC to claim 'Exceptional Circumstance' in the use of green belt land.

4. Brown field and other site usage - In clause 4.61 it is stated that

other potentially developable urban sites in the north and east of Warrington are included in the call for sites exercise but have not been considered for inclusion in the preferred option. If other urban land is available for housing development, but has not been included in the land bank calculation, how can exceptional justification be claimed for the use of green belt land in South Warrington. It is understood from documents issued by SSE, the operators of Fiddlers Ferry power station, that it is highly likely that the station will only continue to operate up to 2020, 2 years hence due to increasing and unsustainable financial losses. Furthermore the Government is committed to phasing out coal fired power stations by 2025. It seems clear that the uncertainty expressed within the preferred option clause 3.6 is flawed and that post 2025 this site, at the latest, will become available for development, the earliest date possibly being 2020. WBC should factor in their plans for the potential gain in land bank now, at this planning stage, such that the uptake of green belt land is negated or severely reduced.

5. Main development locations - It is clear that of 5 further sub options from the Stage 4 location option evaluation, Option 2 has been chosen resulting in the location of the Garden City suburb. The fact that Option 5, which does not require the wholesale uptake of green belt land has been dismissed cannot be grounds to claim exceptional circumstance. This decision making cannot be viewed as justification and is considered to be contrary to NPPF and White paper guidelines.

The consultation process has been not only inadequate to the point of people being turned away at consultation venues but this being dismissed as not happening and badly communicated (why was the notification listed in the Westmorland Gazette and NOT the Warrington Guardian???) , 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.
- 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.

The proposals of roads through nature reserves which are home to a diverse selection of wildlife, the effective vandalism of the countryside for an "aspiration" are nothing short of a horror film and I urge Warrington Borough Council to take a step back and consider what atrocities they are actually suggesting.

Kind regards

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[Redacted]

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