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

28<sup>th</sup> September 2017

Dear Sir/Madam

Re Warrington PDO Regulation 18 Consultation

I am a resident of Warrington and wish to object in the strongest of terms to the above planning proposal. My objections are based on 5 areas.

- 1. The flawed consultation process
- 2. The flawed calculations justifying housing and population increases
- 3. The adverse effects on existing roads and infrastructure
- 4. The adverse effects ton wildlife within the Green belt
- 5. No exceptional circumstances exist to justify the removal of the Greenbelt in South Warrington.

## **Consultation Process**

The decision of the Supreme Court in respect of Haringey Borough Council in 2014 held that whilst there is no general duty to consult people affected by a decision it did make reference to a duty to consult arising out of a common law decision of (RBIO ACTION LTD) against the Secretary of State for the Home Office 2007 EWCA No 1139. This identified that consultations should be carried out fairly. If a person or persons are affected adversely by the proposal then they should be contacted directly by hand delivered messages and telephone about the proposal. This should be reinforced by street notices and press releases. None of this appears to have happened in this particular incidence and certainly not on Weaste Lane.

It appears that the consultation process was timed to coincide with the summer school holidays when many people affected by these proposals would be away from the Warrington area thereby placing a limit on the number of people able to respond. This situation was compounded by a complete absence of news releases, letters or street notices advising of the consultation process.

No proper access to the proposals were available except on line or supposedly through hard copies kept in local libraries. There is plenty of anecdotal evidence locally to demonstrate that library staff could not provide the documentation or were completely unaware of the proposals.

At the open days there were very few people able to answer specific questions in relation to the detail of the proposals or expand knowledgably on information contained in the PDO document. Those that did endeavour to provide answers gave contradictory replies to other planning department staff or quite simply unable to answer questions.

At the open days at Lymm and Stretton there were significant queries outside the venues severely limiting the amount of time people had to view the proposals or the ability to ask planning

department staff questions. I personally spoke over 800 people at Stretton about their views of the PDO, the consultation process and the presentation at the Park Royal Hotel to which nearly all replied that information detail was vague and that specific questions could not be answered.

## Flawed Housing Calculation

The housing calculation contained within the PDO document is both historic and inaccurate. It, for example, was compiled prior to the Brexit Referendum and takes no account of that decision in its population projections.

The PDO documentation takes no account of the fact that there are 4000 homes in the Warrington area lying empty and potentially able to accommodate up to 10,000 people. All these properties are able to utilise supplies of electricity, gas, water, with access to road and in close proximity to existing public transport. The refurbishment of these properties would provide affordable accommodation to the residents of Warrington at limited public expenditure.

There is no mention of the huge Brown field site at Fiddler's Ferry which will be available for redevelopment form 2025 at the latest. This site alone could accommodate the balance of the home required.

Why therefore does the proposal wish to reclassifies Greenbelt and build high values homes upon it attracting people from outside the Warrington area who will commute to Manchester and Liverpool areas and contribute very little, other than the community charge, to the local economy. They will also bring with them 2 or more motor vehicles per household and significantly compromise the existing traffic problems in Warrington.

## Adverse Effects on Existing Roads and Infrastructure

The Roads in and around Warrington are already operating at capacity. Nitrous oxide emissions from motor vehicles in the Warrington area are amongst the worst in the country and the second worst in the North West of England. The building of new properties in the South Warrington area and the building of new roads will compound the problem not alleviate it.

These proposals will result in the construction of a new road through the greenbelt in Thelwall and divide Weaste Lane in two. This will break a link that has existed between the South Warrington villages of Grappenhall and Lymm that has existed since Saxon times. This will completely cut off the community to the East of this road from Grappenhall.

I understand that the proposed route will remove access to the Transpenine Way at Thelwall. This will be a great detriment to the people who live in close proximity to the proposed new road and also spoil the enjoyment and health benefits of the many uses of the TPT including walkers, runners, cyclists, horse riders etc.

## The adverse effects ton wildlife within the Green belt

No account has been taken of the effect that these proposals will have on the wildlife in the area. WBC displays a complete disregard to the contribution that wildlife provides to the ecology of the greenbelt in Warrington. There are flourishing populations of bats, red kite (a protected species) and an array of water creatures, including rare newts, toads, and voles indigenous to this area.

No Exceptional Circumstances exist to justify the removal of the Greenbelt in South Warrington

The proposed removal of Greenbelt in South Warrington, specifically at Grappenhall, Appleton and Stretton is disproportionate and unfair. Other Greenbelt areas including Culcheth, Croft and Lymm are according to this proposal to receive 500 homes each yet Grappenhall and Appleton are to receive 7000 homes. This is clearly not a balanced and fair approach.

It is my firm view that no exceptional circumstances exist that justifies the reclassification of greenbelt given that the "true" housing requirements can all be accommodated within Brown field sites.

The Government's current white paper, "How to fix out Broken housing Market" supports strongly the avoidance of using Greenbelt stating that authorities should fully examine all other reasonable options.

1. Effective use of Brown field sites i.e. Fiddler's Ferry and town Centre land

2. Using land that is underused – most of our Greenbelt is used for agricultural purposes. 3. Optimising proposed density of housing i.e. affordable town centre accommodation which is close to local amenities and public transport 4. Exploring whether other authorities can meet the development requirement.

The PDO fails to fully demonstrate that exceptional circumstances have been met in accordance with existing legal authorities and the Government's present consultation documentation. I look forward to your response to my observations and would be grateful of confirmation of receipt of my letter.

Yours Faithfully,