

I am adding my objection to the ill thought out proposals that have been issued with the attachment and below.



## Significant loss of Green Belt Land

- The PDO includes the release of greenbelt land to support 9,000 new homes over the next 20 years.
- The National Planning Policy Framework indicates that established Green Belt boundaries should only be altered in "exceptional circumstances". There is no definition of "exceptional circumstances". WBC indicate they believe that these are exceptional circumstances, but their reasoning is unclear.
- This land is not 'spare' land, it is actively being used for agricultural purposes. In the current context of uncertainty following 'Brexit' and broader climate change, using no greenbelt land, or at least a smaller portion of it, should be considered.
- This issue affects the whole of Warrington.

## A desire for "City" status is driving the growth

- The PDO is based on an assumption of 1,113 new homes per annum over the next 20 years, equating to around 24,000 new dwellings. Although the reasoning for this assumption is discussed in the PDO, the conclusion needs to be challenged in light of the current economic environment. Adopting a lower assumption of new homes per annum could have a significantly reduce the amount of Green Belt Land which would be needed.
- In various parts of the PDO, reference is made to Warrington 'New City'. The aspirations of WBC to become a city are not necessarily shared by residents. Such aspirations appear to be driving a higher housing assumption and employment assumptions than may otherwise be necessary or realistic.

## Sheer scale of the proposed Garden City Suburb

 The proposal of a Garden City Suburb in South Warrington has horrified many of the residents who currently live in this

- area. The smaller villages such as Appleton Thorn, Grappenhall and Stretton, which are currently separated from one another by fields, will be completely surrounded by the new residential developments. This will completely change the character of the area and destroy its history and heritage.
- The ability to access and enjoy green space is an amenity in itself and the loss of such a significant amount of green space will be detrimental to all residents, not just local ones.

## Stockton Heath is already over capacity

- Stockton Heath is not mentioned specifically in the PDO but the impact of the Garden City Suburb and the Warrington South West Extension on this village will be enormous.
- The traffic lights at the junction of the A49 and the A56 in Stockton Heath are already operating at capacity and the A49 flowing through the village is frequently at a standstill.

### Traffic issues and geography

- A detailed traffic survey has not been included in the PDO.
- Warrington is uniquely positioned close to the M6, M56 and M62 motorways. The growth of Warrington has often been attributed to its proximity to the transport network. But Warrington is affected detrimentally whenever there are problems on the motorway network.
- The PDO includes an 'Eastern Link Road' from M56 Junction 10 to the north of the Manchester Ship Canal (This route would cut right through the proposed new residential areas. On the downside, this would provide a new HGV access road to the Barleycastle Trading Estate (which, at the moment, is only accessible from the M6 junction). It would also provide an alternative route for traffic caught up in problems on the M56 / M6 motorways. As such, this will result in the deterioration of the quality of life for current residents who will be subjected to increased noise, pollution and vibration from the increased traffic flow.
- The PDO also suggest the use of an old railway embankment and bridge to the west of Latchford Locks as a new strategic transport route. Again, this route would be detrimental to the people currently living in this area.

#### Environment

- A high level environmental and ecological impact survey has not been included in the PDO.
- A wide variety of animals and birds live in the greenbelt areas including badges, water voles, great crested newts and bats.

## Higher density in the town centre, lower density in outer areas

• WBC have used a housing density of 30 dwellings per hectare

- throughout the PDO.
- Achieving a higher housing density in the town centre (such as apartments) of up to 40 dwellings per hectare could mean that a lower density could be achieved elsewhere in the PDO. This would have the advantage of requiring less greenbelt land or enabling a different type of housing mix to be built (such as bungalows for elderly residents).

#### Healthcare

- Warrington and Halton hospitals are already operating at or near to capacity. Almost all of the GP / medical centre in Warrington are operating at or near to capacity.
- Whilst the PDO makes mention of providing new health facilities in the Garden City Suburb and the South West Extension, there is notably no mention of increasing capacity at Warrington Hospital or a new hospital South of the canal to cater for the 'Southern residents' as it will be nearly imposssible to reach current hospital with an extra 24,000 cars on the road. The residents occupying the additional 24,000 dwellings will also need access to healthcare facilities.

# Equality

South Warrington is disproportionately affected by the Plan. North and Eastern Warrington are barely touched by the proposals

# <u>Sustainable South Warrington's Thoughts on the Preferred Development Option put forward by Warrington Borough Council</u>

## **Context for these thoughts**

"Sustainable South Warrington" was originally formed by a group of local residents and local councillors to object to the HCA Planning Applications for 770 houses in South Warrington. We sought to raise awareness of the planning applications so that residents had an opportunity to submit objections if they wished to do so. Members of our group then represented our community at the planning committee meeting to object to the proposals. We view the deferral of planning applications for 770 houses in Grappenhall Heys and Appleton Cross in June as a great success.

Given the massive development proposed for South Warrington in Warrington Borough Council's Preferred Development Plan ("PDO"), our group has considered how we could respond effectively to the consultation.

The PDO includes a "Garden City Suburb" of 6,000 houses in South Eastern Warrington and an "urban extension" of 2,000 houses in South Western Warrington. This means that ALL of the fields in Higher Walton and Appleton and many in Stretton and Grappenhall could be built on.

We have shared below the key areas which members of our group plan to include in our personal responses to the PDO consultation. You may wish to include some or all of these in your own response to the consultation. And you may have plenty of other points that you wish to raise. Please don't use the points below as a template, it is much better to write your own response in your own words.

As the name of our group suggests, members of our group live in South Warrington but a broad number of the points below could be raised by residents from any part of Warrington (e.g. loss of greenbelt land, aspirations for City status).

It is essential that residents respond directly to Warrington Borough Council ("WBC"). WBC cannot ignore the voice of residents in South Warrington so ACT NOW and make your voice heard.

The closing date for public responses is 5pm on Friday 29<sup>th</sup> September 2017.

There are three ways of responding to the consultation:

- ONLINE: www.warrington.gov.uk/localplanreview
- EMAIL: <a href="mailto:ldf@warrington.gov.uk">ldf@warrington.gov.uk</a>
- LETTER: Planning Policy Team, Warrington Borough Council, New Town House, Buttermarket Street, Warrington, WA1 2NH

Following the summary of our key thoughts, we have included some general guidance on the best way to submit your responses to WBC.

#### **Our Key Thoughts**

## Significant loss of Green Belt Land

- The PDO includes the release of greenbelt land to support 9,000 new homes over the next 20 years.
- Paragraph 83 of The National Planning Policy Framework indicates that established Green Belt boundaries should only be altered in "exceptional circumstances". There is no definition of "exceptional circumstances". WBC indicated on page 15 that they believe that these are exceptional circumstances, but their reasoning is unclear.
- This land is not 'spare' land, it is actively being used for agricultural purposes. In the current context of uncertainty following 'Brexit' and broader climate change, using no greenbelt land, or at least a smaller portion of it, should be considered.
- This issue affects the whole of Warrington, it is not a South Warrington issue.
- Brownfield sites should be exhausted before any building is permitted on Green Belt Land.

## A desire for "City" status is driving the growth

- The PDO is based on an assumption of 1,113 new homes per annum over the next 20 years, equating to around 24,000 new dwellings. Although the reasoning for this assumption is discussed in the PDO, the conclusion needs to be challenged in light of the current economic environment. Adopting a lower assumption of new homes per annum could significantly reduce the amount of Green Belt Land which would be needed for housing.
- In various parts of the PDO, reference is made to Warrington 'New City'. The aspirations of WBC to become a city are not necessarily shared by residents. Such aspirations appear to be driving a higher housing assumption and employment assumptions than may otherwise be necessary or realistic.

### Sheer scale of the proposed Garden City Suburb

- The proposal of a Garden City Suburb in South Warrington has horrified many of the
  residents who currently live in this area. The smaller villages such as Appleton Thorn,
  Grappenhall and Stretton, which are currently separated from one another by fields, will be
  completely engulfed by the new residential developments. This will completely change the
  character of the area and destroy its history and heritage.
- The ability to access and enjoy green space is an amenity in itself and the loss of such a significant amount of green space will be detrimental to all residents, not just local ones.

#### Stockton Heath is already over capacity

- Stockton Heath is not mentioned specifically in the PDO but the impact of the Garden City Suburb and the Warrington South West Extension on this village will be enormous.
- The traffic lights at the junction of the A49 and the A56 in Stockton Heath are already operating at capacity and the A49 flowing through the village is frequently at a standstill.

#### Traffic issues and geography

- A high level traffic survey has not been included in the PDO.
- Warrington is uniquely positioned close to the M6, M56 and M62 motorways. The growth of Warrington has often been attributed to its proximity to the transport network. But

Warrington is affected detrimentally whenever there are problems on the motorway network.

- Whilst we are supportive of investment in infrastructure should housing developments take
  place, the PDO includes a number of routes which cause serious concern. These routes will
  result in the deterioration of the quality of life for current residents who will be subjected to
  increased noise, air pollution and vibration from the increased traffic flow:
  - The 'Eastern Link Road' from M56 Junction 10 to the north of the Manchester Ship Canal would cut right through the proposed new residential areas. On the downside, this would provide a new HGV access road to the Barleycastle Trading Estate (which, at the moment, is only accessible from the M6 junction). It would also provide an alternative route for traffic caught up in problems on the M56 / M6 motorways.
  - The PDO also suggest the use of an old railway embankment and bridge to the west of Latchford Locks as a new strategic transport route. Again, this route would be detrimental to the people currently living in this area.
  - The "Howshoots Link" from Grappenhall Heys to the M6 junction would effectively become an alternative HGV route for traffic coming to/from Warrington and Runcorn areas, leading to even more traffic flowing through the A49 and A56 in Stockton Heath.
- In the 2011 Census, 81% of Warrington households had access to at least one car / van with 39% having access to two or more cars / vans. Nationally, just over a quarter (26%) of households had no access to a car / van which was considerably higher than in Warrington (19%) indicating higher levels of car ownership in Warrington. If a further 24,000 households are created in Warrington without substantial investment in sustainable transport options, the traffic situation will deteriorate further.

## **Environment**

- A high level environmental impact survey has not been included in the PDO.
- A wide variety of animals and birds live in the greenbelt areas including badgers, water voles, great crested newts and bats.
- In May 2016, the World Health Organisation reported that Warrington is the second worst town / city in the North West for breaching safe levels of air pollution (second behind Salford). According to the WHO, ambient air pollution is the greatest environmental risk to health and causes more than 3 million premature deaths worldwide each year. Although Warrington Borough Council claims to take air pollution seriously, recent council decisions suggest this is not the case (e.g. the new multi-storey car park in the town centre and the increasing bus fares / reduced bus services).

Higher density in the town centre, lower density in outer areas should be explored

- WBC have used a housing density of 30 dwellings per hectare throughout the PDO.
- Achieving a higher housing density in the town centre (such as apartments) of up to 40 dwellings per hectare could mean that a lower density could be achieved elsewhere in the PDO. This would have the advantage of requiring less greenbelt land or enabling a different type of housing mix to be built (such as bungalows for elderly residents). Proposing a higher density in the town centre would match the desire of many new potential home buyers for housing without gardens, close to the town centre for social life and close to public transport hubs to avoid needing cars.

## Healthcare

- Warrington and Halton hospitals are already operating at or near to capacity. Almost all of the GP / medical centre in Warrington are operating at or near to capacity.
- Whilst the PDO makes mention of providing new health facilities in the Garden City Suburb and the South West Extension, there is notably no mention of increasing capacity at Warrington Hospital. The residents occupying the additional 24,000 dwellings will also need access to healthcare facilities.

# Equality

• South Warrington is disproportionately affected by the PDO. North and Eastern Warrington are barely touched by the proposals.

# <u>General Thoughts On Submitting Your Response To Warrington Borough Council's Preferred Development Option Consultation</u>

It is essential that residents respond directly to Warrington Borough Council ("WBC") about the Preferred Development Option ("PDO"). WBC cannot ignore the voice of residents in South Warrington so ACT NOW and make your voice heard.

The closing date for public responses is 5pm on Friday 29<sup>th</sup> September 2017.

There are three ways of responding to the consultation:

- ONLINE: www.warrington.gov.uk/localplanreview
- EMAIL: Idf@warrington.gov.uk
- LETTER: Planning Policy Team, Warrington Borough Council, New Town House, Buttermarket Street, Warrington, WA1 2NH

We have put together these high level thoughts on submitting your response to the PDO consultation:

- There is no limit to the number of consultation responses that a household can submit. If there are two or more people living at an address, you can each submit a response. It's better to submit your own response rather than co-signing someone else's response.
- It is the quality rather than the quantity of the responses to the consultation that will make the most impact. This doesn't mean that you have to be an expert on planning matters, but it does mean that you should include some information or explanation to support your views. This doesn't meant than overall quantity doesn't count, but it'
- Write in your own words, don't copy other people's responses word for word. Some people
  will be happy to share their consultation responses with you directly or via social media –
  reading these can be a great way to form your own opinion about various matters, but you
  should try and write in your own way.
- Feel free to be emotive!
- There is no right or wrong way to phrase your views on the consultation. You might not have all the grammar and spelling correct and it doesn't really matter. The most important thing is to submit your response to WBC so they can get an understanding of your opinion.
- If you do not like the format of the online consultation form, you can write a letter or send an email to WBC with your comments.
- The 'structural' name of the online consultation form does not mean that the PDO is a 'done deal', the purpose of the form is to help the recipients at WBC consolidate all the responses from residents.
- You can attach photographs and documents to your response.
- Discuss the PDO with your neighbours, family, friends and work colleagues as the
  consultation on the PDO is relevant for anyone who lives or works in Warrington. If WBC
  only receives consultation responses from people in South Warrington (whom the loss of the
  green belt will affect most), they may feel that the views of people in South Warrington are
  not representative of the whole of Warrington.
- Sharing your views on the PDO consultation on social media does not count as submitting your response. Only responses submitted directly to WBC count.
- If you submit your response and subsequently think of another thing you wanted to say, you can submit an new online form, write a letter or an email.