



To Whom it may concern

Re: Warrington Council's Proposed Submission Version Local Plan

I would like to object to the content of the Proposed Submission Version Local Plan of Warrington Council. More specifically the Proposed Development of the South East Urban extension and the proposed release of green belt lying between Grappenhall, Appleton and Stretton.

The main purpose of green belt is to control urban growth, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belt is their openness. The other purposes include prevention of neighbouring towns merging into each other, safeguarding the countryside, preserving the setting and special character of historic areas and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

One cannot help but think while driving around the urban areas of Warrington that there is enormous capacity for regeneration and improvements here, before resorting to encroaching onto green belt.

The assessment itself when read does seem flawed as this area stops Appleton merging with Grappenhall Village. Undoubtedly this would result in the beautiful, historic village centre, and sensitively developed surroundings, to merge in an urban housing estate confluent with Appleton and Stockton Heath. In so doing, losing the intimate, historic feeling of this very recognisable area. This would result in the loss of the heritage asset of the area of Grappenhall Village, the green belt between the village and Appleton helps to preserve the historic and picturesque character of this area, which would be lost if the proposed development went ahead.

This area of green space is used by many people for leisure activities; walking, dog walking, cycling, running, bird watching, school excursions, football, falconry, fishing, metal detecting, shooting and tennis. Both those who live locally, and those who live further afield visit. This was further evidenced during lock down when in one morning we counted 200 people walking or cycling along

Stockton Lane, which is in this area. This makes it an important community amenity area. The area would not be so attractive for these uses with an extensive development of houses and industry, and its associated infrastructure. The plan seems to omit to recognise that part of the greenbelt on Stockton Lane falls within the green cordon set to protect Grappenhall old village. This is set out in the village design statement available on the parish council website. There is no mention of this, or the other conservation area around York Road in the greenbelt assessment (although it does mention one in Warrington and a second in Lymm).

It has been judged in past cases, that preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to the green belt boundary.

If proposing new green belt boundaries local planning authorities should; Demonstrate why normal planning and development management policies would not be adequate.

Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary.

Show what the consequences of the proposal would be for sustainable development.

Demonstrate the necessity for the local green belt and its consistence with local plans for adjoining areas.

Show how the green belt would meet the other objectives in the framework.

Inappropriate development is, by definition, harmful to the green belt and shouldn't be approved except in very special circumstances.

The local plan includes developing the following houses in the south-east urban extension: 2400 in plan period and 1800 beyond. This is still the same number of homes planned as in the previous draft, just over a longer time frame. So it is misleading to say that the council has listened to residents objections to the number of homes to be built in this area.

In the previous plan there was urban capacity for 13726 houses so to get to the then 20K target 7000 were designated to be built on greenbelt. The 10% flexibility uplift has now been removed and the new plan is for almost 15000 houses. Fiddler's Ferry has been included in the new plan with 1300 new homes. So with the same previous urban capacity plus the new brownfield development (brownfield first) this totals over 15000. So why removal of greenbelt? Why is Fiddler's Ferry brownfield land allocated to supplying some homes outside the planning period rather than all within, at the expense of green belt?

Maybe because of these figures: Market housing revenues SE Warrington Urban Extension £3552 psm vs Fiddler's Ferry £2745 psm.

The plan says (5.5.11) "... the release of Green Belt land will work in parallel with brownfield development...". Brownfield first? Not in Warrington.

As the majority of land proposed is government-controlled Homes England land, why has this not been withdrawn from the plan if there is to be no unnecessary building on Greenbelt as the Prime Minister recently announced? Is it because the pockets of the developers are deeper than the council in their ability to legally argue their case? Or is there donorship money at stake for the government? Peel have certainly been pushing this development for over 15

years in their Northern Powerhouse plans. Recommendations that Homes England's actions should be updated have been detailed in a recent report, to refocus on renewing and regenerating "left behind" neighbourhoods. This is not how this plan has been produced. Rather to build large estates for commuters, rather than look at real life improvements. This is short sighted of the council, in my opinion as a tender writer for companies working within the NHS, and sweeping problems under the carpet, as raising the living and social care standards will lead to cost savings long term in regards to healthcare and education provision.

The Local Plan is driven by the desire of the Council (or other third parties?) to create a "new city", it is not the current need of the town, and there is little evidence or reference to this current (or near future need) of the town and its residents, just the desire for unrealistic economic growth.

The green belt satisfied the tests of durability when it was designated and there have been no exceptional circumstances to justify a change from this status. The key driver for green belt release seems to be the aspiration of the council to become a "New City". This is not a sustainable way forward in a climate emergency.

The use of "sustainable" in this plan is misleading as it does not refer to the environmentally driven sustainability but rather the ability of the houses and business properties built to generate income to provide the services to the area and developer profit.

In recent years Warrington has not developed as many homes per annum as planned and it is questionable (even by the council leader at a local public discussion event) that the levels detailed are achievable.

Until Warrington reaches city proportions with demand and the infrastructure already in place to support such developments on green belt land "exceptional circumstances" cannot exist.

The projections and "extensive" infrastructure planning (for which there is not yet funding) of the council are not current exceptional circumstances.

Exceptional circumstances must be demonstrable that show the benefits of the development will outweigh the harm caused to the green belt. The National Planning Policy Framework (NPPF) policy is very clear that local councils can only take land out of the green belt in exceptional circumstances but they should have looked at EVERY other alternative first. Just the need for a development is simply not a sound enough rationale when councils are to develop their local plans. A Strategic Housing Land Availability Assessment must be used considering Sites of Special Scientific Interest, protected sites, areas of outstanding natural beauty, heritage assets, etc.

The documentation associated with the local plan is very technical and needs experts to drill down into these figures, which we will do, if necessary, in consultation with Mr Harry Shipley, a planning expert who has previously worked in Warrington.

Looking briefly as a layperson there is little evidence, or reference to location of evidence, for many of the figures used.

It is interesting to see Warrington's projected change in population when Liverpool, Leeds and Manchester is projected to be 20% from 2014-2025, and the national average 23%, and that of London and its environs with increases up to 40%. Economically the International Monetary Fund has cut 2017 growth forecasts for the UK, indicating the need to reassess the economically derived figures and potential economic growth of the area. There isn't clarity about the time frame the growth projections are based on. If they are based on figures from the (unprecedented) financial boom prior to the financial crisis of 2008, this will obviously skew the projections unrealistically.

From the housing strategy it appears the shortage is in social and genuinely affordable housing. This is not adequately addressed in the plan.

There is also no mention of how "Brexit" and its consequences may affect the population size of Warrington i.e. if EU workers originally from outside the UK return to mainland Europe. Has any mapping of unemployment hot-spots of the borough been carried out, with potential local sites which could aid employment opportunities in these areas identified? This would create a more sustainable town and fewer additional transport issues.

There is no justification for the uplift in planned housing above that figure achieved using the formula proposed by the Government, as all the economic initiatives highlighted will potentially be needed just to maintain the current level of employment for residents of the town and the natural increase in population.

The council concedes that there is uncertainty in forecasting future job growth and that there is a reduction in rate of job growth forecasted towards the end of the Plan period. Until these figures are more certain, exceptional circumstances cannot be proven. It is presumptuous that the economically proven cities of Manchester and Liverpool will not be the "key drivers" of the North West economy, rather than Warrington.

The local plan does not fit with the growth of other neighbouring areas, and doesn't seem to be referenced to its place within the planning of the North West economic and residential growth. I fear for empty warehouses, low paid jobs, commuter suburb sterility and loss of the identity of Warrington, especially South Warrington, as a place to want to live.

There is no mention of the future of employment opportunities, considering technology and future changes. This must be considered in a plan that stretches so far into the future.

Also no consideration has been given to future brownfield sites that will come up over the period of the plan, only those available at the moment. There is no commitment to release brownfield sites over greenfield documented.

A shorter plan would give a much more rational approach to this issue.

If greenbelt is reclassified, it is then open to any development. Greenbelt can be built on currently, albeit with stricter planning scrutiny. This has been shown

locally at Omega North Warrington where designated employment land has been reclassified as residential. Surely keeping greenbelt as such and having these additional planning controls in place would be a positive aspect for the communities, character of the area and environment IF it can be proven that SOME (i.e. not thousands) of homes should be built on this land.

The area of green belt adjacent to Stockton Lane, Church Lane and Lumb Brook Road is particularly rich in wildlife and is an area recognized as ecologically important. This is wildlife that thrives because of the unique mix of habitats here; managed grazing, arable farmland, mature hedgerows, reedbeds, ancient trees, woodland and the historic Bridgewater Canal.

Specific creatures include buzzards, water voles, newts, kestrels, owls, pheasants, stoats, hedgehogs, kingfishers, bats, foxes and myriad insects (including stag beetles) and small birds.

Kingfishers are afforded the highest degree of legal protection under Schedule 1 of the Wildlife and Countryside Act 1981. It is an offence to disturb these birds when nesting in any way. Human disturbance of nesting birds is a serious problem due to the nature of these birds behaviour.

Bats are afforded special protection by both domestic and international legislation. It is a criminal offence to disturb a bat roost (with or without bats in) or group of bats or to obstruct access to a bat roost (i.e. bat commuting areas – relevant here).

There seems to have been no mention of meaningful ecological and environmental surveys of any of the greenbelt land to ascertain the presence of sensitive populations of wildlife.

The other issue that increased housing brings, which would affect the nocturnal wildlife, is increases in light levels at night due to increased street lighting. Recent studies have highlighted the issues that bats have if areas are changed to a built up environment. The drop in insect numbers has also been linked to artificial lighting at night.

Stockton Lane currently has no surface water drainage systems in place, and so there would be a very real vulnerability for any polluting run off from increased use of this lane, or from neighbouring developments (both during and after the development phase) to enter the canal and cause environmental pollution problems.

The Biodiversity Strategy for England, Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services identifies "the protection and improvement of the natural environment as core objectives of the planning system".

The land here is of value for current recreational use, farming, ecological and natural beauty. It is not the low quality scrubland that makes up some greenbelt. There will be a huge environmental impact of removing green space and replacing it with concrete. Changes to wildlife habitats, potential negative effects on wildlife in the area and decline in their populations, effects on atmospheric CO₂/O₂ levels, and on water absorption into the ground.

The documents boast a laughable “net gain in biodiversity”. Current environmental science shows the devastation to micro ecosystems within the soil and mature trees, as well as other sites by human development. You cannot remove soil and replace with lower level soil, or soil from another site without destroying the populations of depth specific microbes and other organisms. This leads to essentially sterile soil that takes hundreds of years, if ever to return to its original level of biodiversity. The same is true of mature trees and ponds. All have their own inhabitants, who have adapted and developed over many decades. Removing mature trees and replacing with young trees from a different environs or removing a pond and making a man made replica takes away the biodiversity of the area and doesn't replace it like for like. The imported creatures (if any) may not be appropriate and thrive in the area. The arrogance of developers that they can replace the inhabitants of ecosystems to improve them, when they cannot even hope to replace them like for like is hyperbole and deceitful.

Green corridors have been shown to be of little benefit to wildlife. The small areas promote inbreeding leading to restricted gene pools and the related health and survivability issues of the plants and creatures there. Islands of green and corridors mean that animals moving out of an area have no new territories to move into leading to infighting and road deaths.

The government's Natural Environment White Paper, *The Natural Choice: Securing the Value of Nature*, refers to the role of planning in protecting and improving the natural environment and facilitating coherent and resilient ecological networks that reflect the value of natural systems. The aims of the White Paper include halting biodiversity loss by 2020 supporting “healthy, functioning ecosystems”. The plans by Warrington Council fly in the face of these recommendations.

The recommendations also have positive steps to promote the natural environment, which are important when considering the future pressures and challenges of climate change (unless you choose to refute the scientifically proven problem of climate change exists).

Please refer to Warrington's Climate Change Declaration. How does the local plan relate to this document? Has the progress made in these commitments been achieved, or monitored, as promised, and have the results been shared as promised?

Another issue the Council identifies is current traffic congestion.

There is nothing concrete in the Council's plans to ease congestion into the town centre and onto the motorways.

More specifically there are roads in Grappenhall and Appleton which cannot be widened or changed to promote better traffic flow and these will always cause bottlenecks of traffic, which will only be worsened with the proposed increase in population in these areas.

Specifically:

Stanney Lunt Bridge – single track, weight restricted, historic listed bridge over the Bridgewater Canal leading into Grappenhall.

Grappenhall Village – cobbled, narrow road with single track, weight restricted bridge.

Lumb Brook Road – steep, fast, winding road leading down to a single track, height restricted, listed bridge.

Teachers at the local Cobbs Infant School have recently petitioned for a pedestrian crossing to be put onto this road due to safety issues, issues which would only be exacerbated by an increase in traffic.

Stockton Lane – a single track, winding country lane without surface water drainage. This lane has been closed for many years due to a fatal car accident. The width of the lane is governed by the canal at one side and houses on the other at one end of the lane. In other places the lane is right on the canal bank and in others has a steep gradient. This lane is extensively used for recreation since it was closed. There are many walkers, cyclists, dog walkers and families who use this area, and it is part of the English Half Marathon route.

Developments as detailed in the Local Plan would change the character of this lane irreparably and from all recognition. In 2007 it was judged that the lane should not be reopened for through traffic, for safety reasons, unless changes were made to the lane and its surroundings. At the time there was no funding available for this.

Infrastructure must be in place before any developments are planned. Planners can, and do, renege on previously agreed commitments regarding providing and financing infrastructure.

It has been admitted that the New Town didn't complete its infrastructure programme, and since then Warrington has continued to grow in size, sprawl and population. This accounts, in part for the congestion thorough and around the town.

This is only likely to get worse as has been shown by drivers trying to avoid paying tolls at the new Mersey crossing, finding alternative routes, e.g. via Warrington.

Local Plan consultation drawings include “sustainable modes of access across the Bridgwater canal”. But when questioned Council representatives do not know what these will be “as they haven't gone into that level of detail”. The land in this area is designated as residential and also safeguarded for a mass transit system... which is it? And in what order will these proposed developments take place? Who would want to live in a new home only to find a large transport link is to be built through their neighbourhood? Increasing reliance on road traffic is wholly inconsistent with the UK's climate change aspirations.

Historically the Manchester Ship canal was the main obstacle to improving the connectivity between Bridgwater area and the town centre. In the 1970's a strategic decision was made to limit development in Bridgwater until the infrastructure was in place to sustain it. At that time it was intended to replace the high level bridge at Akers Road with a new high capacity road bridge, thus opening up Bridgwater for sustainable development. That bridge was not built. The council is now faced with exactly the same decision as was required in the 1970's, namely, how can new development be connected to the town centre. It was then, as it is now, the most important issue to be resolved in planning terms as it defines the spatial configuration and phasing of the whole development. This issue has not been addressed by the council. I can find no supporting

documentation which demonstrates how this issue is properly addressed, other than a range of documents postponing proper investigation (thanks to Harry Shipley MRTPI FLL, who helped prepare the New Town masterplans for Bridgwater and Westbrook Districts of Warrington, for his input with this). Conversations with stakeholders in the sports club, which will be crossed by a new bridge confirm that the aspiration of the council is to build a flyover crossing the roads, fields, homes, Bridgwater Canal, more homes and Manchester Ship Canal. This would have devastating effect on the appearance and air quality of this area.

The National Planning Policy framework (2019) states that transport issues should be considered from the earliest stages of plan-making and development proposals. This plan does not, there is a lot of ambiguity in their plans and drawings and a woeful lack of detail.

The future of the Western link would appear to be questionable on the grounds of cost and given the removal of Port Warrington and the South-West Urban extension, but it still appears on the plan.

There is no detail on how the Town Centre will be regenerated, or preserve the character of our area, both of which are Warrington Council policy objectives. Personally, I would rather travel elsewhere than shop in Warrington Town Centre.

There is currently a lot of unused warehouse and retail units in and around Warrington, e.g. half finished units at Junction 9 retail park and over 200,000 sq ft of vacant warehouse space at Barley Castle Industrial park. This is not accurately audited by Warrington Council and leads to question why they are proposing more warehousing developments on greenbelt (656 development is already out there).

The Highways Agency is particularly concerned about road loading if the current version of the local plan goes ahead, and as pointed out by our planning consultant, has the power to veto any of the development plans if they are not satisfied with the safety and loading of the road network.

It seems that with such a rigid road layout, adding more traffic to these roads would be both dangerous and a driver of increased congestion. The stationary traffic from such congestion would increase air pollution to a level that may be legally unacceptable.

In 2013, from WBC's 2016 Air Quality Annual Status report, 4.8% of deaths in Warrington were due to man made particulate pollution. This is above the average for the North West (4.6%). It admits that there are many areas in Warrington close to major roads where nitrogen dioxide levels are high and exceed national standards. WBC was measuring these levels in 50 places and in 2015 29 of these (nearly 60%) exceeded the council's objective of 40 micrograms of nitrogen dioxide per metre cubed. More worryingly in all of these areas the levels of nitrogen dioxide had risen since 2014. An increase in traffic around the town can only add to this when the council has not suggested any strategies to help combat air pollution from traffic and industry (e.g. park and ride schemes etc). In Grappenhall and Appleton, near a proposed site of housing and at two of the narrow restricted roads mentioned above, there are crossing points for children of two local primary schools. As WBC recognizes itself, air

pollution particularly affects the most vulnerable in society, for example children. Air pollution in Warrington at some sites and times is at crisis point, with only Salford ranked above Warrington in the North West, and breaches the safe levels for PM2.5.

In addition vehicle fuel emissions and small particulate debris pollution have been shown to increase the incidence of dementia and respiratory disease. I am sure you are aware of the "Oslo effect". Will WBC land this on us and our children?

It is worth noting that Warrington has a higher than average level of car ownership, compared to the rest of the UK.

The council accepts that the preferred development option would necessitate new facilities such as schools, health centres etc. Also added to this list would be waste facilities, the refuse tip at Stockton Heath would be inadequate for such an population increase. It would also mean securing funding from the NHS for an increase in dentist places. There is no mention in the plan if any of these facilities have secured funding, and so, if they are achievable or sustainable.

CQC inspections of January and February 2015 for Warrington and Halton NHS Foundation Trust showed a bed occupancy in excess of 100% with continual pressure for these beds. In winter 2014/15 A&E waiting times reached over 4 hours and by January 2016 full capacity was declared for the A&E department with waiting times reaching 8 hours or more at peak times. This has continued to deteriorate to this day.

New hospital and healthcare facilities must be in place before any major increase in population is considered, or the council will be failing all of the residents in providing acceptable healthcare.

Are the CQC aware of these population expansion plans? Have they, or the current healthcare providers, been consulted on their view of the PDO?

The 2011 census showed 1 in 6 Warrington residents is over 65, and this figure is likely to rise over the period of the plan, yet there is no mention of care facilities, supported housing etc to cater for this age group.

The current crime rate in Grappenhall is much lower than the average of Warrington. This rate will not just rise in line with increase in population, but in excess of the rise of population, most likely to the level of Warrington generally. How is this increase going to be prevented or serviced? Will there be more police officers, more funding and a new police station? In the current climate is this even feasible and deliverable?

A shorter plan (twenty years is longer than recommended or used by most authorities) of 10 years would enable a more accurate assessment of true needs for business growth and housing provision, once the current political and economic question marks have largely been resolved. The infrastructure that has been put in place (e.g. new high speed rail lines) could then be more effectively utilized, the current plans of neighbouring cities (who, lets be honest, have more of a draw for investment in future-proof employment opportunities than the town of Warrington, which is little more than a large retail park and warehouse area) could be incorporated.

Brownfield sites, such as Fiddler's Ferry, must not be shied away from for development because of clean up or other costs. Brownfield sites must be developed in priority to green belt.

Warrington Council's lack of commitment to brownfield development can be evidenced by their failure to submit a bid to participate in the first round of the Brownfield Land Release Fund.

The brownfield register is a necessity for Councils, it is disappointing to note that Warrington isn't on the list of towns and cities who took part in a 2016 pilot scheme for this register, even though many neighbouring towns (e.g. Wigan) and cities did. Maybe this indicates their level of concern and commitment in this area?

The Empty Homes Programme was withdrawn by the present government in 2016, but is an area where a pioneering, future facing council would look to improve its town. Empty properties are a blight for residents, the environment and the authorities. There are over 1,000 properties unoccupied in the town centre alone. Why is this not being addressed or audited?

On the Levelling Up agenda, Mr Gove has sought to address future direction of planning and development, setting out objectives for levelling up, "we want to strengthen local leadership to drive real change. We will raise living standards especially where they are lower. We will improve public services especially where they are weaker. And we will give people the resources necessary to enhance the pride they feel in the place they live."

In reality profit is behind developers' reluctance to build on brownfield land. Building on green fields is more profitable and less difficult than building on brownfield that may need clearing or decontaminating. This means higher up-front costs for the developer and plots are often smaller, meaning less scope for the large homes that will make the most money.

No wonder that in consultation with developers, there was approval for release of greenbelt from developers, but no mention of using brownfield sites to capacity first.

It may be the case that councils are keen to remove land from the green belt for housing to increase their revenue. The government's "New Homes Bonus" is paid to councils for all houses built in their area, and research suggests that this is driving the increased amount of planning permission given by councils, including greenbelt areas.

Research conducted for the Campaign to Protect Rural England (CPRE) by the University of the West of England has shown that there is space for at least one million homes on brownfield land in England. I am sure that Warrington does not have an exceptionally low brownfield area compared to the rest of the country.

I do not agree with the council statement that regarding greenbelt release "...the council has demonstrated that it has considered all other reasonable options for meeting its identified need for development..." or that "'Exceptional Circumstances' are further justified through the spatial strategy of the Plan".

A recent CPRE report also showed that developments on brownfield land are completed more quickly than on greenfield sites, and academic studies have also shown that cleaning up contaminated brownfield land has public health benefits. These sites should be used before any greenbelt land is considered for release, rather than cherry picking fields in the greenbelt.

Council representative's have acknowledged that WBC has no revenue or funding for ANY of the infrastructure needed for these developments and is reliant on revenue developed from sale of the sites and building of the houses. Surely this is not the sign of a robust plan, with built in contingency. It is usual for infrastructure such as roads etc to be guaranteed before houses are built. I would also postulate that the "South East Urban Extension" would probably not be home to many workers in Warrington, but (as this area is currently) to commuters to Manchester, Liverpool and other areas of Cheshire, Trafford and Merseyside.

This is especially true, if the plans of the Council's representatives at the public consultation are to be believed, and that houses here will be representative of the houses already in the area (minus the necessary 5-10% low cost starter homes). Certainly if this is true they are unlikely to be in the price range of the low quality jobs that are going to be created in the local "employment area".

The Localism Act 2011 represents one of the most far reaching reforms of the planning system since 1947, effected by "taking power away from officials and putting it into the hands of those who know most about their neighbourhood – local people themselves".

The presumption in favour of sustainable development is an operational principle for plan making and development management. The golden thread reinforces the need for positive evidence based plans that objectively meet the development needs of communities.

The community of South Warrington must be listened to and its needs, not those of developers, used to formulate a Local Plan.

The NPPF makes clear that viability and deliverability are key tests of all aspects of planning decision making, and requires local authorities to assess the cumulative burden of local requirements and plan policy.

In this case viability and deliverability cannot be proven. Funding has not been secured for the improvements to infrastructure that would be needed for the viability and sustainability of such large development plans over such an extended period.

The Local Plan document itself is badly written and the maps provided in it and at the consultations are difficult to read, not detailed with regards to key points (such as changes in road layout) and at times contradictory.

It is offensive that more commercial websites associated with WBC, such as Warrington and Co and speakers at events have been taking this development option and greenbelt release as already decided for many years. Surely it should not be marketed to the private commercial sector as a development plan until it has reached the point of development being approved?

It is worrying as a resident of the area of the proposed new urban extension that the Council has not fully considered the implications, deliverability and sustainability of such a plan.

I am concerned that the desperate financial situation Warrington Council has got into and the lack of transparency, professionalism and knowledge of its board members has put it in a vulnerable position while creating this plan, with pressure from developers and other potential stakeholders who may withdraw support or funding if their wants are not met. There are relationships between WBC and its members, and developers, e.g. Langtree, The Hut Group etc, which makes impartiality and transparency in their dealings and development proposals questionable.

During the last local plan consultation we hired an expert in planning and sustainable development to help us with our objection. This public consultation had a duration of 8 weeks, this is his comment... “ Normally to answer these questions I would need to go through the planning documentation carefully... Quite frankly, there is just not enough time to go through that process. It is a big ask and expensive to fund...”. How can the public engage confidently with the council when this is the case?

I fear that many, especially more vulnerable groups, may not be fully aware of the plans and how it may affect them, or how to share their views with the council. I would be interested to know how this resonates with the Council’s Equality and Vulnerable Adults policies. From one of WBCs own documents “Priority 3: Aging well” ... “I am treated with dignity and respect and am included in my local community”. This should follow for all residents young and old.

Local plans should be aspirational but realistic and give clear guidance on what will or will not be permitted and where. This version does not.

I look forward to your consideration of these concerns.

Yours sincerely

Helen Carson