



## Proof of Evidence - Summary

# Loss of Amenity

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Rule 6 Party  
Peel Hall - APP/ M0655/W/17/3178530

## Loss of Amenity Proof of Evidence Summary

- 1.1 Our main area of concern quite simply is that the appellant proposes to utilise Ballater Playing fields to provide houses and more importantly, to provide a through road to serve the site. Radley Common will be utilised to part relocate Ballater Playing Fields to justify taking possession of this section of land and thus displacing a valuable community asset into a completely different ward/community.
- 1.2 In doing so, the local residents and users of Ballater playing fields stand to lose a valuable amenity whilst gaining nothing in return. Local residents of Radley Common playing fields can expect to see a change of use from informal to formal sports. In both cases, this constitutes a significant net loss of amenity to the existing community to benefit a new community in years to come.
- 1.3 Ballater Playing Fields are located to the east of the proposed development and lies between Mill Lane, Ballater Drive and Radley Lane – see Appendix 1. The 3.2 hectare site is used for formal sports use and more importantly for informal uses including, but not limited to;
  - i. Football
  - ii. Kite Flying
  - iii. Picnics
  - iv. Dog Walking
  - v. Family Walks
  - vi. Bat and Ball Sports
  - vii. Other informal leisurely activities

1.4 Radley Common Playing Fields are located to the south of the proposed development and is bounded by Radley Plantation to the north, Windermere Avenue to the west and Grasmere Estate to the south and east – see Appendix 2. The 2.97 hectare site is used for occasional formal sports use and more importantly for informal uses including, but not limited to;

- i. Football
- ii. Kite Flying
- iii. Picnics
- iv. Dog Walking
- v. Family Walks
- vi. Bat and Ball Sports
- vii. Other informal leisurely activities

1.5 Appletons Addendum 2 to Environmental Statement Volume 8 item 13.97 asserts the proposed 1200 dwellings amounts to a population increase of 2,753 new residents.

1.6 The current UK average household lies at 2.4 people per household. This figure being taken from the Office of National Statistics - Families and households in the UK: 2017

1.7 This would equate to an increase in local population of 2,880 residents & 60 care home residents, providing a total of 2,940 residents.

1.8 We would therefore query these occupation figures, given that they no doubt plug in to transport and journeys which in turn have a direct correlation with noise and air quality.

1.9 Based on national average of 2.4 persons per household, the Rule 6 party argue that the current provision recommended by the appellants is inadequate on the basis that local amenities are effectively being taken away from existing communities to service a new development – this demonstrates a net loss in amenity to existing communities and this is wholly unacceptable.

- 1.10 By providing equipped playing facilities within each housing development for informal play, the Rule 6 party would assert that the appellant therefore also agrees that these spaces are solely intended for that small community.
- 1.11 By providing segregated sections of land within each housing development for informal play, the Rule 6 party would assert that the appellant therefore also agrees that these spaces are solely intended for that small community.
- 1.12 There has been a total disregard towards the existing local community using the informal play area on Ballater Playing Fields. The appellants plan proposes to take this valuable amenity and use it for new dwellings and access road and with it, completely takes away thousands of residents access to a field that has serviced the community for over 35 years.
- 1.13 Appendix 6 & 7 demonstrate additional walking and driving distances required for residents losing Ballater Playing Fields to travel to the proposed site.
- 1.14 Irrespective of the promise of new quality pitches which may seem appealing to the council and Sports England, the simple fact is that the numbers do not add up. The existing community will lose a significant amenity, it will only benefit those of the new development and the provision of a road and houses through this playing field would irreversibly destroy the character of the area – the final slap in the face to existing local residents.
- 1.15 To the best of our abilities, we can account for the provision of 7.58 ha of land for parks and green space – the majority of which is along the motorway buffer zone. The appellants states a total provision of 10.1 ha, a detailed breakdown is required to clarify this.
- 1.16 The appellants proposal for playing fields on the Radley Common and proposed site appears to suggest that all the pitches would be protected by barriers/fencing. This is in keeping with a typical Sports England playing surface specification.
- 1.17 On this basis, the sole intended purpose of the playing facilities will be formal, access will not be available to the public to turn up and play – in real terms therefore the net loss of amenity to the existing general public amounts to 6.17 ha made up of Ballater Playing Fields 3.2 ha and Radley Common Playing Fields 2.97 ha.
- 1.18 Finally, we wish to draw attention to the existing facilities within the general vicinity of the proposed development. The majority of which provide both formal and informal sports/recreational provision.

- 1.19 The appellant claims in Addendum 2 Vol 8 item 13.100 that the existing pitches are of poor quality and that the current playing fields are not utilised.
- 1.20 This is wholly inaccurate, the Ballater Playing fields are being utilised by Winwick JFC as well as a number of adult social groups both during the week and at weekends.
- 1.21 The pitches are in good shape and are being regularly maintained by Warrington Borough Council.
- 1.22 Appendix 9 – sets out plans for the coming season on Ballater Playing Fields.
- 1.23 Appendix 10 – sets out potential future use for the existing facilities at Radley Common.
- 1.24 Appendix 11 – provides context of availability of playing facilities across north Warrington.
- 1.25 Based on the information provided above and within the appendices, we are therefore extremely concerned that the local community are about to lose their access to large sections of informal amenity on the basis that new facilities will be provided in their place – when ultimately it takes away from the public and does not give back.
- 1.26 Instead of re-inventing the wheel, all that is required, is a little investment in existing facilities.
- 1.27 The very thought of this valuable amenity being taken away from local residents angers me. In essence, we have a developer who speculatively purchased land, sold for the simple reason that development was simply too problematical and disadvantageous to the surrounding area. That was the opinion of planning officers over 30 years ago long before the use of cars had grown exponentially.

To make this wholly unsustainable proposal stand the slightest chance of becoming a reality, the appellant is effectively land grabbing and stealing from the local community. Stealing would normally be deemed a little excessive, but in this case it perfectly describes the scenario. Residents stand to have a valuable amenity taken from them with nothing offered in return. This can not be allowed to be the case – it is the responsibility of our representatives within council and government to ensure that this gross lack of regard for our community is not allowed to continue.