

# RSWF Response to WBC Local Plan consultation: Report 2 – The case against using Stretton Green Belt land (R18/088)

The purpose of this document appertains to land Parcel R18/088. Its purpose is:

- 1) To define the original Wallace Land Investments proposal.
- 2) To highlight the stages of inclusion of R18/088 within the local plan cycle.
- 3) To highlight the inconsistent approach to Green Belt classifications.
- 4) To highlight the need of financial gain versus the inappropriate land removal from the green belt.
- 5) To highlight the inadequacy of the proposed solution for the Strategic Distributor Road and offer an alternative route.
- 6) To highlight the inconsistent approach to green buffer zones

## **Brief History**

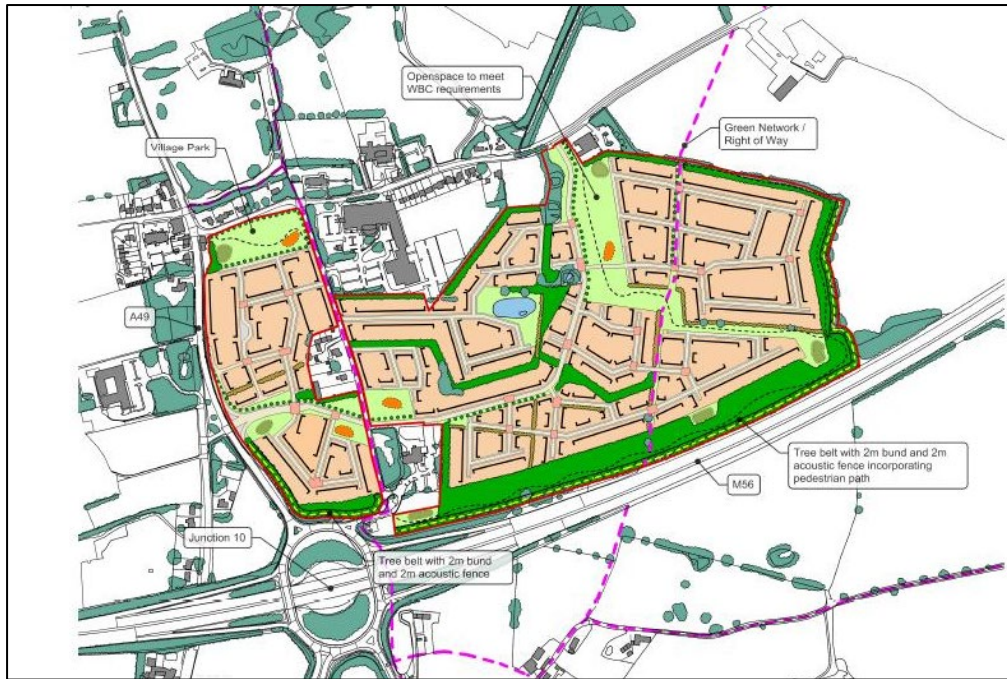
The residents of Stretton were first made aware of the proposal by Wallace Land Investments to build on land in Stretton in and around June 2017. This is when the Stretton Residents Association was formed in an attempt to protect our green belt and raise awareness of the proposal within the community. At this time the adopted Local Plan (2014) clearly protected large swathes of green belt in south Warrington, including the land in question.

Since then, WBC has issued the PDO, Preferred Development Option in 2017 which included the *South Warrington Urban Framework - Issued June 2017*. Following severe criticism by south Warrington residents pursuant to the Consultation period resulted in the issue of the Submission Version of the SVPLP, which included the *Warrington Garden Suburb Development Framework – issued March 2019*. This has now resulted in the current issue of the UPSVLP21 which includes Policies MD2 and MD6 appertaining to the revised plans for the *South East Warrington Urban Extension (SEWUE)*. All of which have a catastrophic affect on the Village of Stretton.

## **1. Wallace Land Investments Proposal**



**Figure 1 – Wallace Original Proposal (circa 2017) (including commercial area)**



**Figure 2 – Wallace Revised Proposal (Feb 2019)**

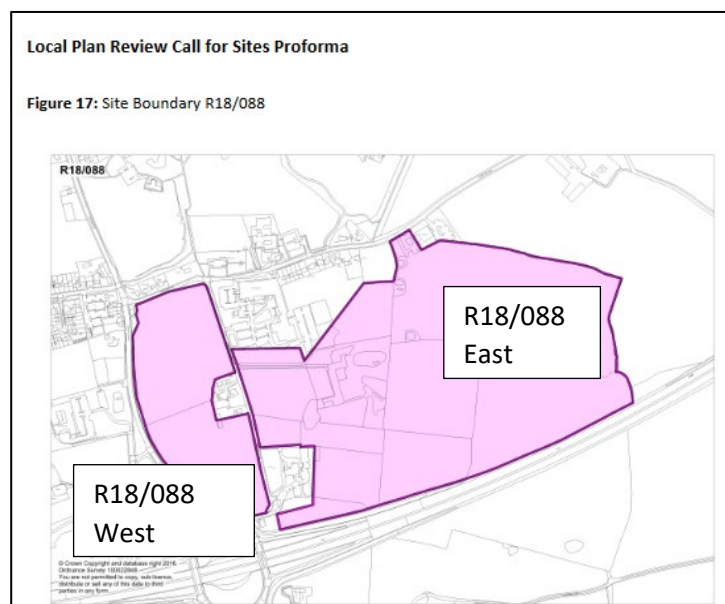
It can clearly be seen that the proposal covered two field areas either side of the roman road, King Street. Currently Spark Hall Close, but formerly the A559 Northwich Road. Spark Hall Close is currently a no through road with a Right of Way footpath at the end of the Close adjacent the Stretton Fox entrance.

## **2. Inclusion of the Site within the local plan cycle**

### **South Warrington Urban Framework - Issued June 2017**

In 2017, very little was known by the general population of Stretton about the preparatory work WBC was undertaking regarding a new Local Plan to replace the current 2014 adopted version. However, in October 2016 WBC issued the 'Call for Sites' notice and three local landowners together with Wallace Land Investments submitted the proposed two parcels of land shown in Figure 3, to be included in the Call for Sites response. Subsequently, WBC issued the Warrington South proformas in July 2017 which included site ref R18/088 which defined the combined two parcels of land at this time.

**Figure 3 – Call for sites Ref R018/088 (2017)  
(Showing 2021 parcel division)**



The 2017 issue of the local plan included a policy which defined the South Warrington Urban Extension (SWUE). The local plan included the 'South Warrington Urban Extension Framework Plan Document – Final June 2017'.

That document included conceptual layouts for the Stretton area. It showed, as in figure 4 below the extent of the site location as marked in red. The limit in Stretton being shown drawn down Spark Hall Close (King Street). Notably only the eastern half of R18/088 was included in the layout. R18/088 Western section was excluded from the layout.

Figure 4 Site Location - 2017



Figure 5 – PDO conceptual approach

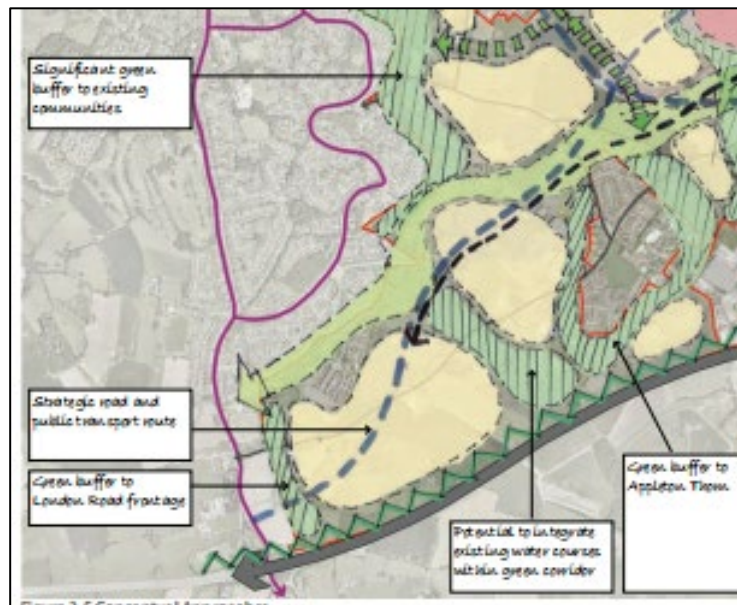
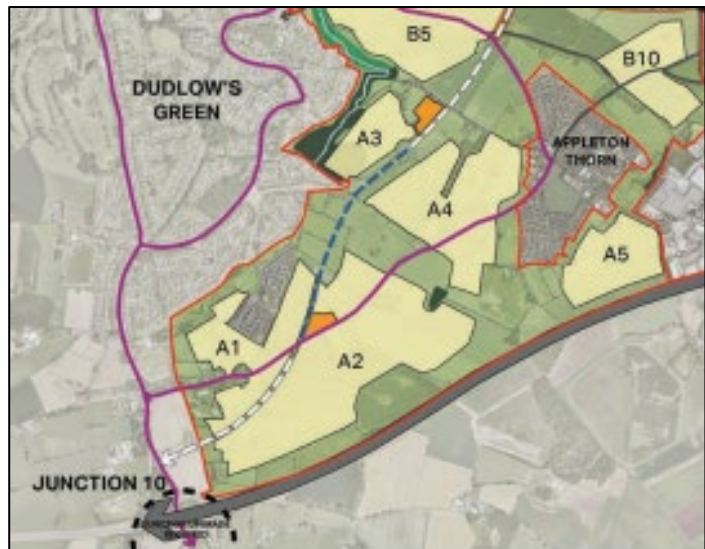


Figure 5 clearly shows the western area of R18/088 as being excluded from the local plan with no residential development. The R18/088 eastern area is shown as green buffer and residential development. However, this conceptual approach also shows the Strategic Infrastructure Road starting off the A49, approximately at Fir Tree Close (Spire entrance) and servicing the residential area and more.

**Figure 6 – Framework Plan  
(Land use plan)**



It can also be clearly seen in Figure 6 that the western land area between Spark Hall Close and the A49 is still open space and not allocated for development. Residential development for land area A2, including a green buffer zone between A2 and Spark Hall Close is evident. Notably, land area A1 has now been developed in advance of the local plan and is the newly completed Barratt development at Pewterspear Green, with 180 new homes.

It must be noted that local Stretton residents at that time, although against wholesale development of the green belt, were somewhat accepting of a proposal which had little or no effect on the central area of the village. The proposal retained the openness of the countryside and the character of the village.

It must also be noted that the above conceptual approach was included in the Warrington New City document as shown



## Warrington Garden Suburb Development Framework – issued March 2019 (PSVLP)

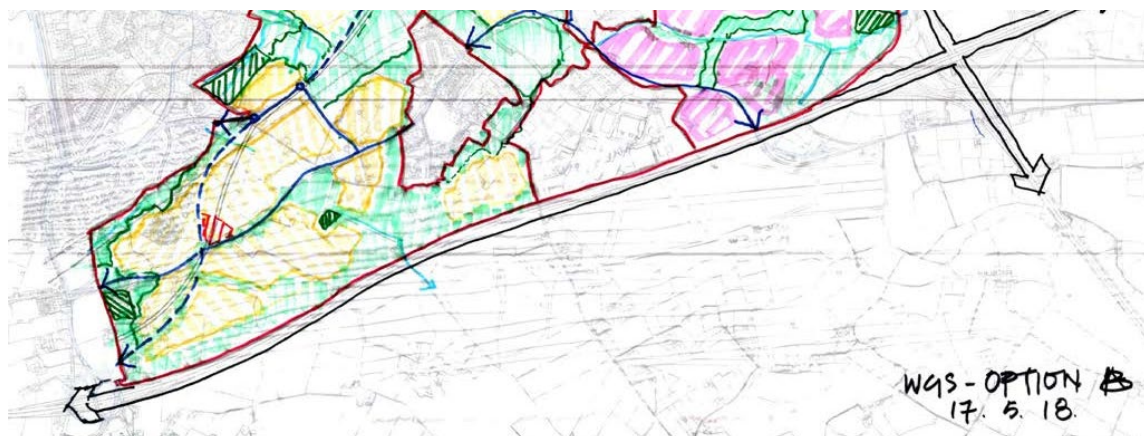
The 2019 issue of the local plan included policy MD2 which defined the Warrington Garden Suburb (WGS). The local plan included a document defining the 'Warrington Garden Suburb Development Framework March 2019'.

This document showed in Figure 7 the revised local plan boundary which now included the R18/088 west land parcel.



**Figure 7 – Revised plan boundary - 2019**

The plan boundary was revised for this 2019 version. It seems apparent that this revision was undertaken following the Regulation 18 response submission by Wallace Land Investments which pointed out the discrepancy. Further information is to be found in section 5 below.

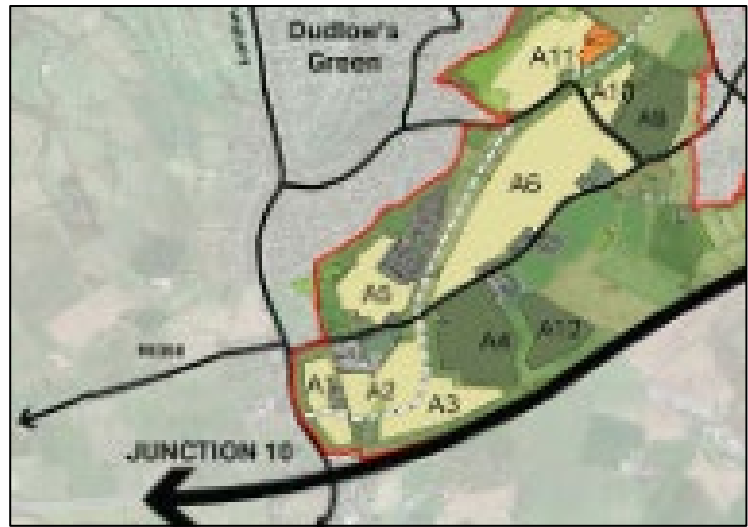


**Figure 8 – Preferred Option B**

However, the preferred Option B still excluded residential development on the western parcel but still showed the strategic distributor road.

Throughout this framework document it can be seen, on inspection, that there are many and various discrepancies between maps, which suggests a degree of inconsistency whilst the plan was being conceptually developed. However, the residential development plan in Figure 9 now clearly shows the western parcel as having a proposed residential development.

Figure 10 – Land Usage.



It can now be seen that the land usage map shown in figure 6 has been revised to include the western parcel marked as A1. This inclusion is inconsistent with the Preferred Option B.

**South East Warrington Urban Extension (SEWUE) – issued October 2021 (UPSVLP)**

The October 2021 version of the revised plan now clearly includes the two parcels of land included within the residential proposals, as seen in Figure 11.

Figure 11 - Illustrative concept.



This 2021 proposal to now include both parcels of land is completely against the wishes of the residents of Stretton. Considering the original proposal was somewhat acceptable to use the East site only, to now include the West site will completely overwhelm the village in an unbalanced and disproportionate manner which is completely against the policies of the NPPF July 2021. Please refer to and appendix regarding non-compliance with the NPPF.

### 3. Green Belt Assessment and reclassification

The original PDO Green Belt Assessment Final Report in October 2016 appeared not to include specifically the land to the south of Stretton Road within the green belt classification, including R18/088. Stretton road was a durable boundary. However, the General Area classification of Area 11, which encompasses Stretton, classified the area as a moderate contributor to the prevention of urban sprawl.

WBC Green Belt Assessment document entitled ‘Garden Suburb Options Final for Issue 1 23 April 2021’ has now changed the land parcel reference numbers from R18-088 to R19/P2/013, furthermore, the latest drawing as Figure 10, refers to the sites as being R18/088E and R18/088W, East and West. This is a confusing and inconsistent numbering.

Furthermore, for no apparent reason the original green belt assessment has changed such that the East plot is remains classified as moderate and the West plot has changed to be classified weak. This seems coincidental and inconsistent in that the only one that reclassified parcel has the most important view which is seen upon entering the village, and that is the church view over open countryside as approached from M56 J10 island. This view maintains the character of the village and should not be spoilt by residential development This west plot should also have been reclassified as moderate.

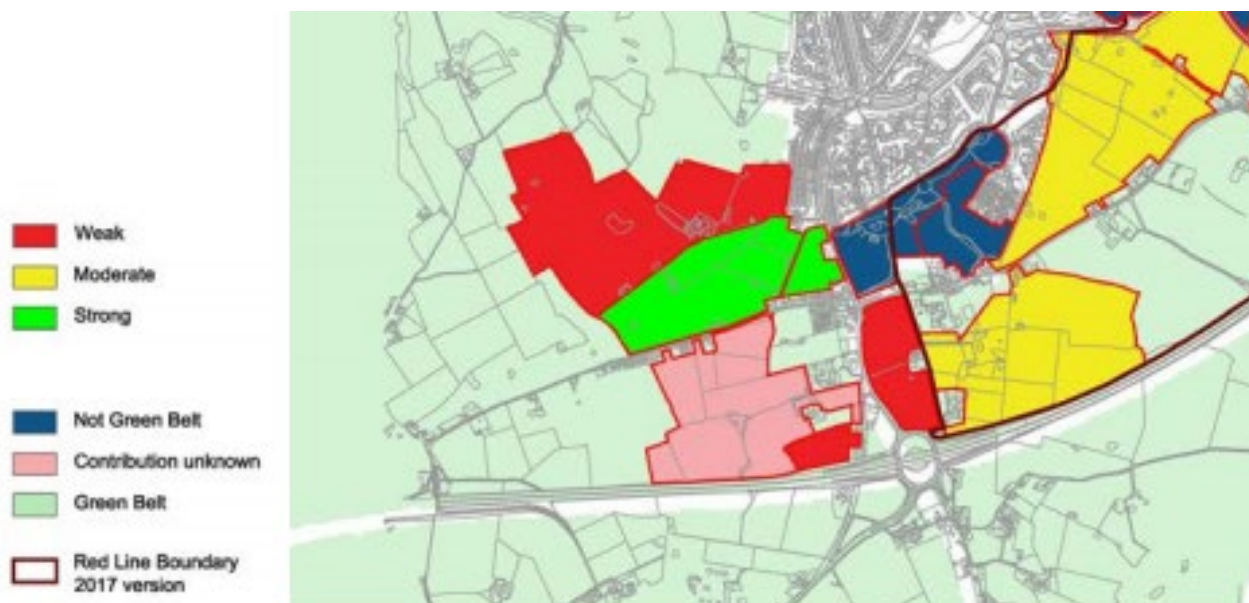


Fig 2.3: Green Belt Assessment

Figure 12 – reclassified green belt assessment

It would appear very inconsistent that parcels of land within Stretton can vary so much from weak to strong and in fact some areas not assessed. Coincidentally the area (R18/088 West) which was requested to be included, by the developer within the plan for residential development, is now conveniently reclassified as weak from moderate.

It should also be noted that the Arup Housing Option 2 only includes R18/088 East as developable land, as seen below

### 2.3 Housing Option 2

Option 2 includes exactly the same sites as Option 1 however it extends slightly further south therefore including one additional site – R18/088. This additional site is shown in Table 2 below. As per Option 1, this option is comprised of weak and moderate performing sites only. All of the sites which comprise Option 2 are illustrated on Figure 7 below.

Table 2. Additional Site in Housing Option 2

Site Ref	Site Name	Alternative SHLAA Ref	Alternative Reg 18 Ref	Alternative Reg 18 Part 2 Ref	Green Belt Assessment Overall Contribution	Green Belt Assessment Stage
R18/088	Land adjacent to M56 (Jtn 10), Sretton	2902		R18/P2/013	East site - Moderate West site - Weak	July 2017

Figure 7. Sites within Housing Option 2

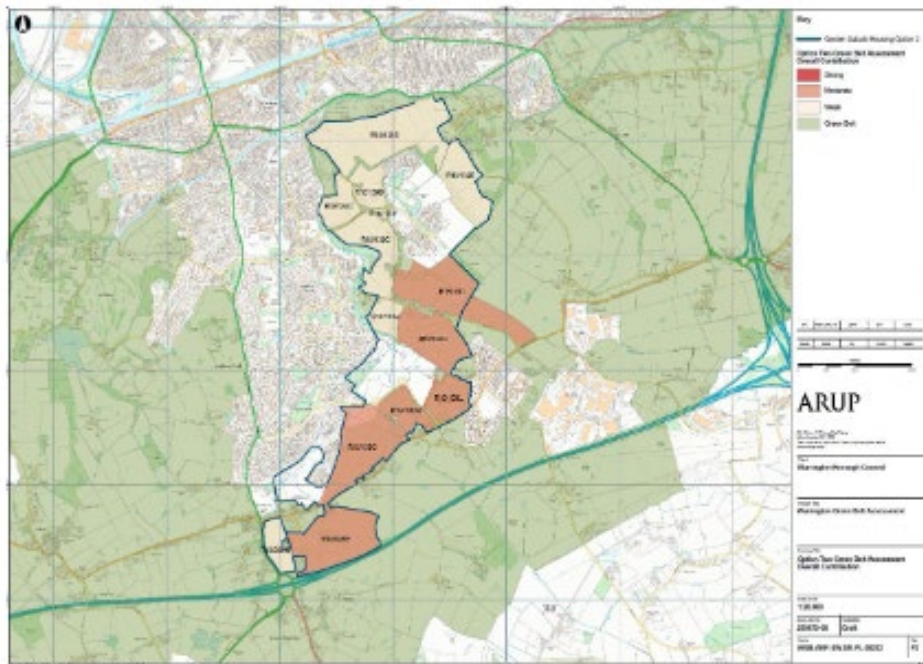


Figure 13 – Housing Option 2



## 4. Unethical Financial Gain

In the initial PDO layouts, the proposed Strategic Infrastructure Road (SIR) feeding the garden suburb was shown traversing the R18/088 West site, with no residential use indicated. How was this to be paid for? maybe compulsory purchase, as recently alluded to by WBC officers at the recent consultations, but no hint at developer funding at this earlier time.

This also was the case as per the South Warrington Urban Framework (June 2017) as seen in Figure 5 above. However, in the March 2019 issue of the Garden Suburb Development Framework (March 2019) the inclusion of residential development on the R18/088 West site now introduced area A1 as targeted for residential use, as in Figure 8 above. Why is this? Well, the answer lies clearly, and as admitted by WBC, in the fact that WBC need developers to pay for the SIR.

It must be noted that the two large swathes of land which comprise the PDO and SEWUE residential proposal are owned by two entities, Homes England and potentially Miller Homes (ex Wallace Land Developments). Notably land parcels R18/088E and 088W are in the potential gift of Miller Homes.

Furthermore, it is unethical and inappropriate for private developers to request the release of green belt land sites in order to further their financial interests. This is specifically true in the case of land site R18/88 West in Stretton whereby the developer highlighted to WBC in their 2019 Reg 18 response in 2019, page 21 clause 4.7 to the PDO regarding the provision of the strategic infrastructure road (SIR) that:

*“Therefore, Wallace urge that the omission is rectified and the entirety of the land at junction 10 M56 Stretton is included to ensure certainty, and that the land will be comprehensively released from green belt and subsequently delivered”.*

In fact, it was not an omission as the original PDO 2017 did exclude this area of land and it was left as open space to be a green buffer to the proposed Garden Village Suburb.

So, the inclusion of this R18/088 West site as per the Wallace plan proposals for residential development is clearly a financial gain incentive to WBC and the proposed developer in return for the developer to fund the Strategic Infrastructure Road.

Taking into account that the latest SEWUE proposal has reduced the green belt uptake throughout the overall proposal financial gain must not be used as a reason for release of green belt. It is fundamentally against the principle of the NPPF for exceptional circumstance.

The community of Stretton would appreciate it if this land was retained as green belt as the original proposals in 2017 such that the openness and character of the village can be retained.

The alternative connection point for the distributor road to be sourced from J10 M56 has already been communicated to WBC.

**Therefore, the proposal to release R18/088 West green belt land for housing in order to fund the SIR for financial gain by the developer and WBC at the expense of the green belt is unethical, unjustified and unsound.**

## 5. Strategic Infrastructure Road (SIR)

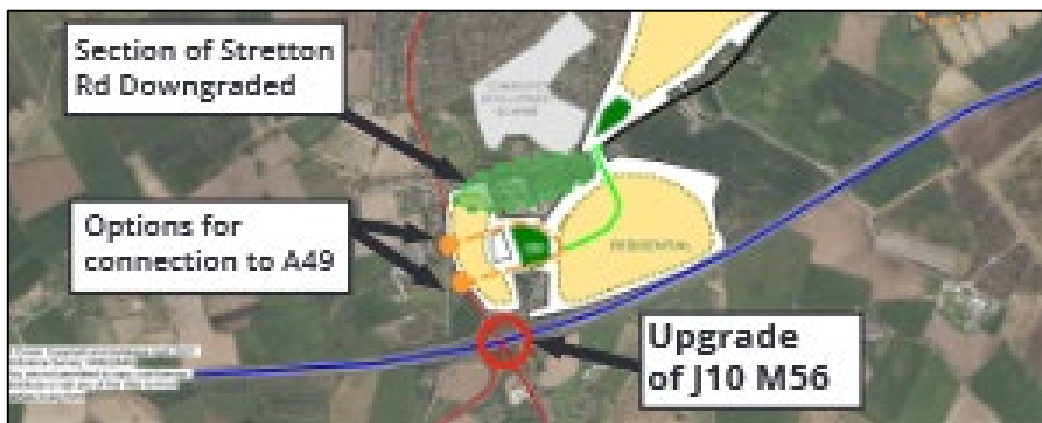


Figure 14 – SIR connection point options

### 5.1 Cat and Lion Congestion proposal

The current proposal to connect the SEWUE enabling infrastructure of the SDR to the A49 as defined in Section 5.34 on page 42 of the Transport Model Testing July 2021 is stated as below:

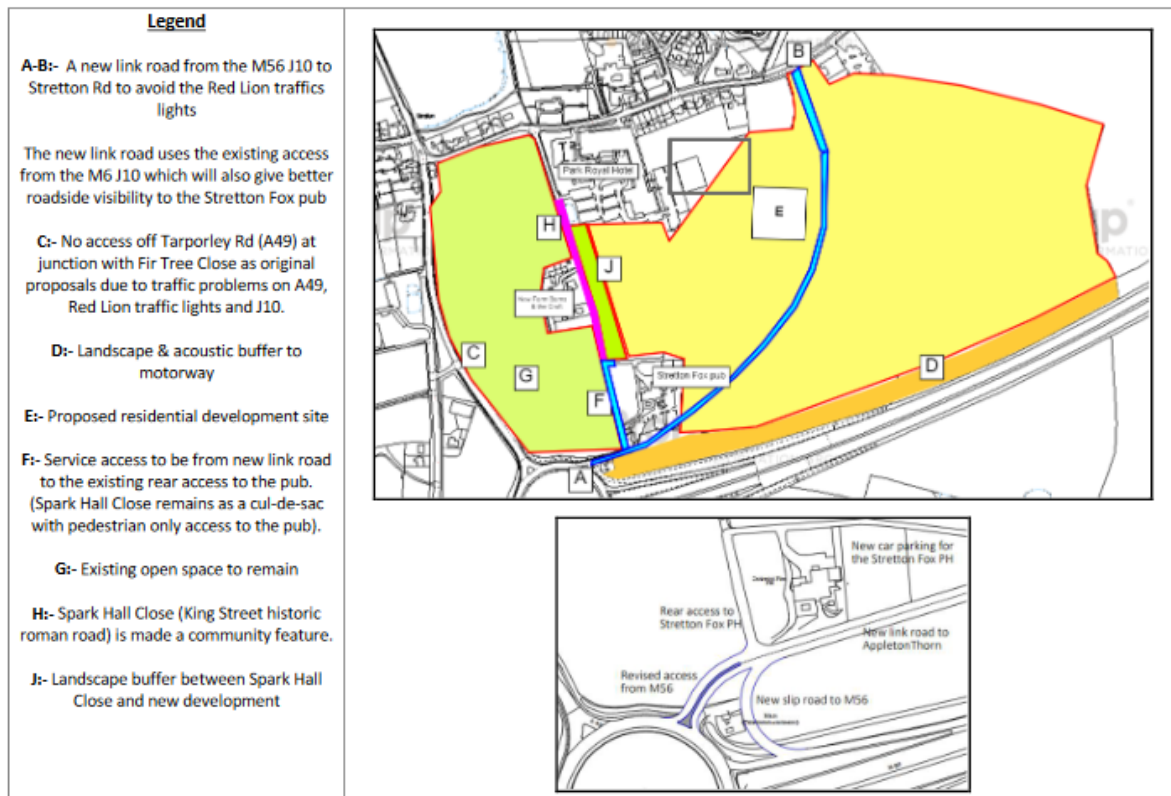
*'The SEWUE enabling infrastructure considers the following:*

- 
- Existing junction upgrades to A49 / Lyons Lane and A49 / Longwood Road junctions***
- 
- A new link between the B5356 Stretton Road and the A49 London Road, south of the existing connection, including a new signal junction on the A49 and the stopping up of Stretton Road at its existing junction with the A49***
- 
- A new link between Witherin Avenue and Dipping Brook Avenue – The "D"***
- 
- A new link between the "D" and Grappenhall Lane, with junction improvements at Barleycastle Lane.***
- 
- Traffic enforcement within Appleton Thorn Village to deter 'rat-running' through the local village and encourage traffic to remain on the supporting infrastructure.'***

The item highlighted in red above and as indicated by the two options shown in yellow as see in Figure 11 are flawed in concept. They will undoubtedly result in additional congestion along the A49. Furthermore, to block off Stretton Road is completely detrimental to all users of the village facilities.

### 5.2 Alternative SIR location

There is of course another solution which has been tabled in the responses to the PSVLP, and previously discussed with WBC officers through correspondence. That is to utilise the existing junction off J10 of the M56 as per the plan in Figure 12 below and marked in blue.



**Figure 12 – Alternate Enabling Infrastructure SDR connectivity**

The adoption of this solution would:

1. Involve minimum or no disruption to the A49.
2. Provide a bypass solution to the Cat and Lion congestion.
3. Not need the requirement to block off Stretton Road.
4. Provide better access to the front and rear of the Stretton Fox establishment.
5. Provide developer access to site R18/088 East (shown in yellow).
6. Site R18/088 West can be retained as green belt and remain as a characterful entry into Stretton.

To further this solution for the connection to the J10 island, there is already a line item under 'Transport' included in the Infrastructure Delivery Plan 2021 for J10 improvements to the value of £5M which could contribute to the solution.

Although WBC have previously maintained that they will not get involved in National Highways proposals for this J10 island, it has recently been divulged in conversation with WBC transport officers at the Consultation event that WBC and National Highways have co-opted together to deliver a solution for M6 Junction 20, Cliff Lane link and small island to facilitate improved access for the 6/56 commercial development. So why is not the same interaction taken over a solution for M56 J10 and the SDR.

It must be noted that in the 1973 WBC New Town plan it was intended to solve the North / South infrastructure problem that a new Expressway was proposed. This in fact started at Junction 10 M56. This surely sets a precedent that the solution can be delivered using the J10 roundabout exit purely used for the Stretton Fox pub.

### 5.3 Design Manual for Roads and Bridges (DMRB)

The following are extracts from the National Highways Design Manual for Roads and Bridges (DMRB). It should be noted that the proposed SDR defined in the current maps, running through residential areas is an unsuitable proposal as it does not comply with the general principles of good road design. This proposed SIR will inevitably be an alternative route for heavy goods vehicles accessing the Barley Castle Trading Estate and 6/56 from M56 Junction 10. This will clearly be to the detriment of the SEWUE residential areas. This strategic route through a residential area has not been prepared taking into account items highlighted in bold red.

#### **GG 103 Revision 0 4. Goals of sustainable development**

##### *4. Goals of sustainable development*

*4.1 The goals of sustainable development shall be delivered throughout the design lifecycle.*

*4.2 The goals of sustainable development require that the design shall aspire to:*

- 1) improve the health, safety and wellbeing of those affected by road infrastructure;*
- 2) improve land, water and air quality;*
- 3) support a sustainable economy;*
- 4) represent good 'whole life' value across the design life of road infrastructure;*
- 5) embrace innovation;*
- 6) reduce inequalities and ensure access to all;*
- 7) use responsibly sourced materials that minimise adverse impacts on people and their environment;*
- 8) be resource efficient and reflect a circular approach to the use of materials;*
- 9) minimise greenhouse gas emissions;*
- 10) be resilient to future climate change;*

***11) protect, and where possible enhance, the surrounding environmental and cultural context;***

***12) be shaped by the opinions of communities and road users.***

*4.3 Where additional goals of sustainable development have been identified by the Overseeing Organisation, these shall be delivered throughout the design lifecycle.*

#### **GG 103 Revision 0 Appendix E/A. Principles of good road design**

##### **Appendix E/A. Principles of good road design**

##### **E/A1 Principles of good road design.**

##### *2: Good road design is inclusive*

*Inclusive environments facilitate dignified and equal use by all. An inter-disciplinary design process involves and places people's needs and views at its heart, nurturing well-being and creating a shared sense of ownership of the road. **All users and communities are considered carefully** in order to reduce barriers to access and participation, particularly mindful of the most vulnerable..*

##### *4: Good road design fits in context*

*The aesthetic quality of a road and its design in relation to the places through which it passes, is integral to its function and the experience of those that use it. **Good road design demonstrates sensitivity to the landscape, heritage and local community**, seeking to enhance the place while being true to structural necessities. It builds a legacy for the future.*

##### *5: Good road design is restrained*

*Functional, but responding positively and elegantly to the context, **good road design allows for the expression of the character and identity of the places and communities through which a road passes.** Good road design can enhance a sense of place and add to what we have inherited, particularly through the use of appropriate materials and traditions, but does not make unnecessary superficial or superfluous visual statements.*

##### *7: Good road design is thorough*

*The result of robust processes that create a continual cycle of improvement, good road design starts with **an in-depth understanding of people, place and context**; learning from best practice worldwide. The design of all elements of the road environment are considered together and integrated into a*

*responsive design.*

*9: Good road design is collaborative*

*Collaboration ensures roads are useful to and **accepted by the communities they serve**. Collaborative working requires a rigorous process that identifies dependencies and wider opportunities, and facilitates effective communication and engagement from the start. **Community engagement will be led by a local sense of culture, place and value.***

## **6. Green Buffer Zone Inconsistency**

Stretton village has a long proud history. From former times, the ancient 'King Street' Roman road runs straight through what is now Stretton village, and is still identifiable in several places. From English historical records, the earliest understanding is that the village of Stretton reaches back to the reign of King Henry II (5 March 1133 – 6 July 1189). The village of Stretton was owned by the Starkey family and it is likely that a chapel was built for the family during the 13th or 14th century. In a will dated 1527 the chapel is referred to as the Oratory of St Saviour. In Leycester's History of Cheshire it is stated that in 1666 the "ancient chapel of Stretton" was "ruinous and in decay". St Matthews Church now resides on that site. Stretton Hall, built in 1664 still stands to this day as a grade 2 listed building.

Reference must be made to the PDO plan for Stretton whereby site R18/088EWest was not originally defined for development and were left as open countryside, i.e., parcels A1 and A2, and a green buffer, site ref R18-088W were identified to preserve the rural character of the village, as shown on the two maps Figures 5 and 6 above. This was acceptable at the time of the Regulation 18 consultation.

With respect to the green buffer zones indicated on the current map, see figure 11, the green buffer to the East of Spark Hall Close is an acceptable barrier to any development within the A2 proposed residential area

Warrington is not the only historically significant area; Stretton also has a long history and the character of the village should be retained. The view from the A49 when entering the village from the M56 is an extremely valuable view of the open countryside over towards St Matthew Church which gives the rural character of the village. That character needs to remain intact.

**This highlights the inconsistent and inadequate solution for the green buffer zones around the village.**