



STRETTON NEIGHBOURHOOD DEVELOPMENT PLAN STEERING GROUP

Facebook 'Stretton NDP'

COMMENTS ON WARRINGTON BOROUGH COUNCIL

UPDATED PROPOSED SUBMISSION VERSION LOCAL PLAN (UPSVLP-2021)

19 October 2021

1. INTRODUCTION

1) This document is a revised version of the original comments submitted by Stretton NDP group to WBC during the SVLP consultation in June 2019. It remains largely similar in content but takes into account revisions now included in the 2021 Updated Proposed Submission Version of the Local Plan (UPSVLP2021). This

2) It is extremely disappointing to find that none of the comments submitted to WBC during the last consultation of the SVLP were not acted upon regarding the green belt release, residential developments and green buffer zones proposed specifically within the Stretton parish boundary. They are all still included in this latest version of the Local Plan and they will, if implemented, will have a catastrophic affect on the Village of Stretton.

3) It is therefore important that Councillors and Examiners understand the history of Stretton in context to the modern world and the proposals within this plan which will potentially have an extremely adverse effect upon the village of Stretton. It must also be remembered that Stretton is a small community and the proposed residential developments will double the number of houses within the village. This is considered to be disproportionate and unjustified.

4) **You are all** custodians of our community and way of life, and we as the community put our trust in you to protect it for the good of the present residents and also for future generations. Warrington Borough Council (WBC) states that the Health and Wellbeing of its residents is a fundamental objective. Please bear that prominently in your mind when reviewing our comments.

5) The preservation of the rural community of Stretton is vitally important such that history, the character, the rural setting and precious countryside remains protected and that it is not destroyed by planning policies which are unsound and unjustified. Plans that dilute our precious way of life and destroy the natural environment, forever, in the case of release of substantial green belt in areas of historical significance.

Historical Context

6) 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.

Neighbourhood Community

7) Stretton Village has undergone a significant increase in housing in the last two years. The recent construction and completion of the Barratt Homes development at Pewterspear Green has increased the number of houses in the village by 40% from 450 to 630. There are also approximately 30 small businesses in our long established and well-rounded community. Parts of Stretton are protected by the current 2014 Local Plan, with Greenbelt designation for

more than 15 years. Stretton is also a critical point on the road network for South Warrington with access to J10 M56 and the A49 main route into Warrington via the Cat & Lion signal junction. These routes are well used and at times severely congested. An increase in housing to the levels proposed will have an additional serious effect on congestion, noise and air pollution.

About the Neighbourhood Development Plan (NDP) Steering Group

8) The initiation of a Neighbourhood Plan for Stretton village and its designated area is approved by WBC and it is now an emerging NDP. The NDP Steering Group consists of a diverse group of long-time residents who represent the majority of the village. We have carried out a public consultation session in Stretton to raise awareness of the residents to the 2019 version of the PSV of the Local Plan and its potential detrimental effects upon our village of Stretton. From the feedback at that session, the singularly most highly valued comment was that residents enjoyed and wanted the preservation of the semi-rural environment and open green space. These concerns are integrated within the comments and objections below. They are also collectively available publically on our social media pages.

9) However, since the WBC 2019 consultation and the ensuing consultation rework that WBC have had to react to has put the development of the NDP on hold awaiting a more defined version of the local plan, that now being the 2021 Updated Submission Version of the Local Plan.

10) The NDP Steering Group supports the Borough Council in having to provide a Local Plan for the whole of Warrington and that it complies with any minimum mandatory requirement for housing development as advised by national guidance or standards, working with developers and agencies. As such we are conscious that our NDP needs to work in parallel with the WBC Local Plan and indeed sensibly with other Neighbourhood groups in South Warrington. However, there are many issues which need clarification and agreement before a satisfactory NDP can be achieved, as highlighted further below in the comments and objections to specific proposed USVLP local plan policies which will affect our village.

11) As an NDP Steering Group, we supported the principle that more housing is needed. We have indeed accepted the additional 180 dwellings recently constructed by Barratt homes on the Pewterspear estate. We are now faced with the spectre of more houses proposed under this new Local Plan, in the form of the Miller Homes private developer proposal. This will increase the housing numbers by figures circa 700 homes, dependant on final designs, on fields either side of Spark Hall Close, the old roman road of King Street. This is over doubling of the village housing stock and it a completely disproportionate increase. This proposed increase will have catastrophic effects on the infrastructure and facilities currently available within the

village. This is very important in so far that Stretton should not be flooded by new housing bringing excessive and unjustified growth, to the detriment of the village and community, where it becomes unrecognizable as a distinct characterful village with loss of the openness of the countryside.

12) As an NDP Steering Group, it is noted that the Local Transport Plan (LTP4), which was adopted in December 2019, has not been reissued with this Consultation. Therefore, the group will not be submitting any further comments, with the exception of the proposed effect upon Stretton of the Cat and Lion congestion solution proposal and the route of the Strategic Distributor Infrastructure Road.

13) It should be noted by WBC that there are a number of errors in the adopted version and that when this version, or when a final version of the Local Plan is adopted that the transport plan LTP4 will need to be revised to suit the new plan.

15) Our initial summary is that the NDP group of residents, on behalf of Stretton residents we represent, are disappointed that the council has not paid more attention to the extensive resident's objections which were within the tsunami of comments to the principles, details and evidence to the Proposed Submission Version PDO (2019) Regulation 18 consultancy before producing the Update Proposed Submission Version of the Local Plan (UPSVLP).

16) Although the plan has made some reduction to green belt release in the wider South Warrington area, with which we agree, it has in fact worsened the effect on Stretton by continuing to including land parcel R18/88 West for the construction of residential development. This land parcel is south of the current durable green belt boundary of Stretton Road.

17) The western parcel this of land in the earlier versions of the plan was a intended to be a green buffer zone which protected the openness of the countryside when approaching the village. We strongly object to the inclusion of this land for residential development.

18) Therefore:

- 1. We do not support the UPSV of the Local Plan where it exceeds minimum mandatory requirement in terms of growth.**

- 2. The plan does not comply with current government thinking, advice and guidelines regarding the safeguarding of green belt land.**
- 3. The plan does not comply with the UK and global climate change and carbon reduction initiatives.**
- 4. The plan does not comply with WBC's own climate emergency declaration as it still advocates a greater reliance on both commercial and private vehicle movements throughout Stretton. This will result in increase noise and air pollution.**
- 5. Inclusion of land parcel R18/088 does not constitute the 'exceptional circumstances' required for removal from the extent of greenbelt within Stretton. This land parcel is targeted by a private developer who has a vested interest with WBC to provide a developer funded strategic infrastructure road.**
- 6. We do not support the concept of the South East Warrington Urban Extension (SEWUE) with its resultant effect in the increase in growth of housing within the village.**
- 7. We do not believe adequate detail is provided within the UPSVLP at this stage of the consultation for a meaningful commentary on its proposals. What detail is available is referred to as being conceptual.**
- 8. We do not support the extent of housing total in the UPSVLP for Warrington sufficient to warrant the release of the green belt whereby other areas of brown field and green field site have not been fully utilized. Therefore, the proposed use of land parcel R18/88 East and West is not acceptable.**
- 9. We do not support the Strategic Distributor Road route across land site R18/88West. An alternative route is offered for consideration.**
- 10. We do not support the Cat and Lion congestion relief proposals. They are deemed unworkable and will result in extreme inconvenience to the residents of Stretton.**

- 11. We do not support the change to the southern durable boundary of the green belt along Stretton Road to that now proposed to be the M56. The western boundary should remain as Spark Hall Close.**

- 12. We do not support the change in the boundary limits of the local plan area from the 2017 issue of the local plan which excluded land parcel R18/088 West to that of the current plan which has been amended to include this area. Remembering that this is the only area outside the original durable green belt boundary which is subject to a private developer proposal.**

- 13. We do not support the change in green belt assessment classification as defined by the Arup & Partners report. Initially land parcel R18.088 was not included in the assessment.**

- 14. We do not support the removal of Grade 2 and 3 agricultural lands from the green belt for residential and infrastructure road development.**

2. UPSVLP - SPECIFIC OBJECTIVE AND POLICY COMMENTS AND OBJECTIONS

- 19) There are many parts of this Local Plan, especially those specific to policies TC1 and DC1, defining improvements to Warrington centre, which are very laudable and are welcome as they do provide a vehicle for continued economic growth and resultant population increase for Warrington.

- 20) Stretton NDP steering group are therefore focussing this response on the specific objectives and policies which have a direct effect upon Stretton Village.

- 21) The proposals for the SEWUE to take precious green belt in Stretton, which is protected by national policy, through the implementation of policy MD2, to satisfy un-needed and overestimated commercial and population growth targets is unjustified and morally wrong to release green belt land. It is incumbent upon WBC to heed and respond to major public criticism of policy MD2. This Policy will have a disproportionate and unbalanced effect on the village of Stretton. It is unjust, unsound, unsustainable and completely against the wishes of the majority of residents of Stretton. MD2 cannot be used to support the 'exceptional circumstance' in order to justify green belt release.

22) The community of Stretton should be appropriately respected. The proposals in MD2 will in fact destroy the very established and much-loved community and village of Stretton. MD2 is not being proposed for the greater good of the community but for the financial gain for WBC.

23) The following comments are aimed at keeping Stretton as an individual inset village, protected by a green buffer zone which will retain the individuality and countryside character of our rural village. Furthermore, the direction of growth should be to limit the additional traffic, especially commercial and industrial traffic within the village. This is already a major problem at some junctions, and which is leading towards a growing degradation in air quality.

Objective W1 - Sustainable growth

Policy GB1 – Green belt release

24) WBC figures for green belt are that 90% of the green belt will be retained. However, the complete picture is that only a small fraction of WBC is Green Belt, but the UPSV proposes to release more. That decision is not sound, and it is against the policies of the NPPF as it does not justify 'exceptional circumstances' to release the extent of land proposed.

25) Warrington will lose approximately 10% of its Green Belt however nearly 90% of that is in South Warrington – this is unbalanced and disproportionately spread across the Borough. There should be no loss of greenbelt unless and until the economic benefits have been fully and openly appraised, and only then that they meet exceptional circumstances.

26) The National Planning Policy Framework (NPPF) states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

27) The green belt assessments employed by the WBC consultants, Arup and Partners, over the three maturations of the local plan, specifically applied to the area in and around the village of Stretton are flawed and inconsistent. The application of the Planning Advisory Service (PAS) guidance rules is inconsistent and favours developers in the designation and weightings applied to certain parcels of land.

28) The aims of the local plans proposals, through implementation of these policy does not comply with current NPPF guidance and shows a great inconsistency in approach to establishing an acceptable green belt assessment and enduring boundary.

29) The development of the three maturations (2017,2019 &2021) of the local plan to support the issues are as described below:

- a) Highlight the lack of exceptional circumstance to release land parcel of R18/088.
- b) Highlight the inconsistent approach to Green Belt classifications.
- c) Highlight the inconsistent approach to the permanent enduring permanent boundary.
- d) Highlight the inconsistent approach to green buffer zones

39) The original requirement which has led to the inclusion of land parcel R18/088 is fundamental to the proposed release of green belt within the parish boundary. Its development over the local plan maturation is critical to understand and is explained below.

1. Wallace Land Investments Proposal



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

Figure 2 – Wallace Revised Proposal (Feb 2019)



31) It is important to understand the green belt assessment inconsistencies in the following brief review is provided. It can clearly be seen from figures 1 & 2 above that the original Wallace Land Investments 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 pub entrance. This Wallace proposal was made public before the first issue of the local plan 2017.

32) This proposal requires the release of green belt land which is classed as Grade 2 and Grade 3 agricultural land. This land has been productively farmed for many years and provides two main functions. The first being food production, but secondly it provides the openness of the countryside and the view to the central area of the village of Stretton to maintain the character of our beautiful south Warrington village. But it is also inextricably linked with WBC proposal to provide a strategic distributor road across this parcel of land.

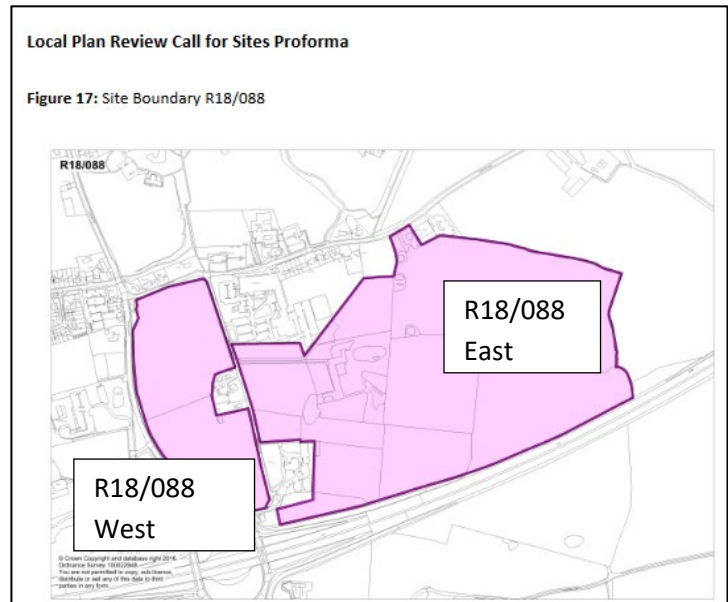
2. Inclusion of the Site within the local plan cycle

2.1 South Warrington Urban Framework - Issued June 2017

33) 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 East & West parcel division)**

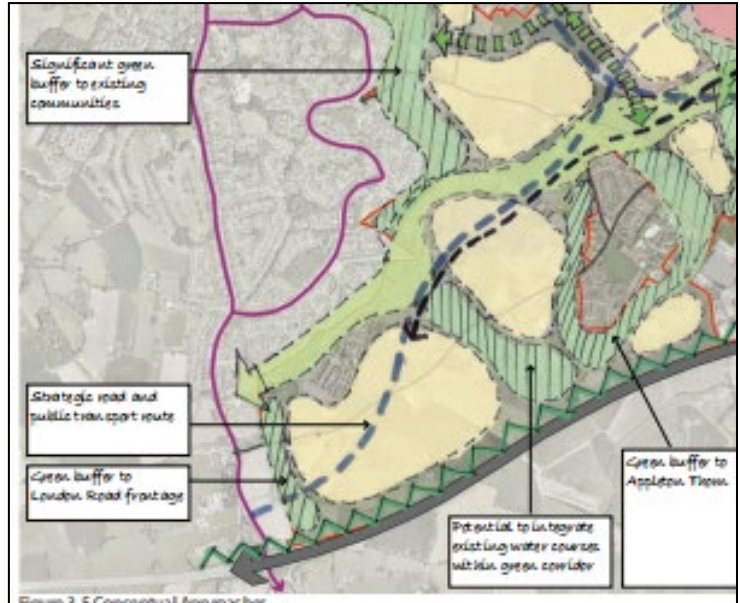


34) The 2017 issue of the local plan included a policy which defined the South Warrington Urban Extension (SWUE), that being the 'South Warrington Urban Extension Framework Plan Document – Final June 2017'. That document included conceptual layouts for the Stretton area. It showed, as in figure 4 below 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. **The durable permanent proposed green belt boundary is shown as Spark Hall Close (King Street) and the M56.**

Figure 4 Site Location – (2017)

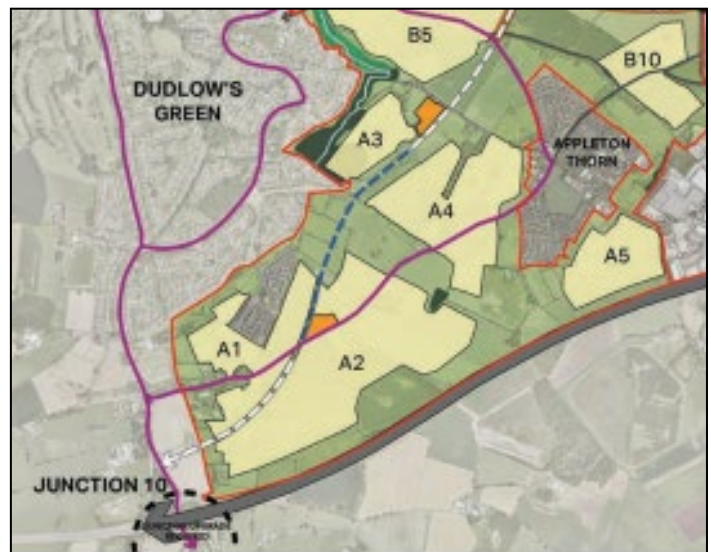


Figure 5 – PDO conceptual approach (2017)



35) 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 a partial green buffer and residential development. This conceptual approach also shows the Strategic Infrastructure Road (SIR) connecting at the A49, approximately at Fir Tree Close (Spire entrance) and servicing the residential area and the greater Garden Suburb area.

Figure 6 – Framework Plan
(Land use plan)



36) 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 partial green buffer zone between A2 and Spark Hall Close is still 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.

37) 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.

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

38) 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)

39) 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 which in fact denied them access to their proposed land which they needed for residential development.



Figure 8 – Preferred Option B (2019)

40) However, the preferred Option B still excluded residential development on the R18/088 western parcel but still showed the strategic infrastructure road as in Figure 8 above. It also shows significant green buffer zone to the east.

41) 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 of the durable green belt boundary whilst the plan was being conceptually developed. However, the residential development plan in Figure 9 below now clearly shows the western parcel as now having a proposed residential development which is contrary to previous concepts.

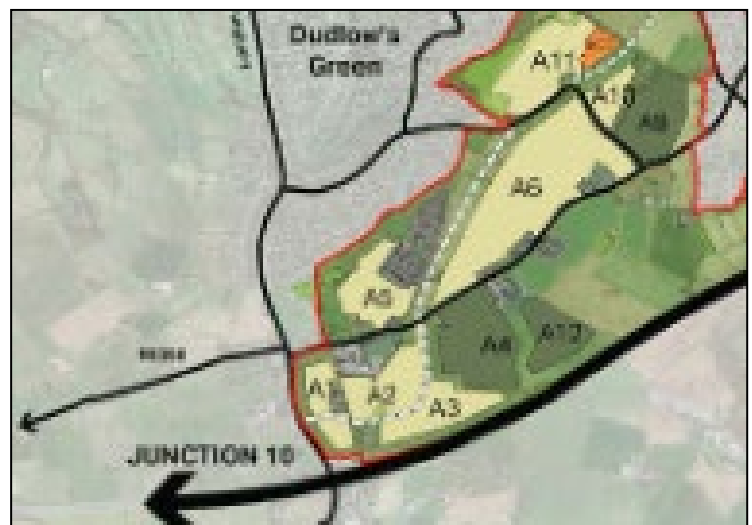


Figure 9 – Land Usage. (2019)

42) It can now be seen that the land usage map shown in the previous Figure 6 has been revised to include the western parcel marked as A1 shown in Figure 9 above. This inclusion is inconsistent with the Preferred Option B.

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

43) The October 2021 version of the revised plan now clearly includes the illustrative concept of two parcels of land included within the residential proposals, as seen in Figure 10.

Figure 10 - Illustrative concept.



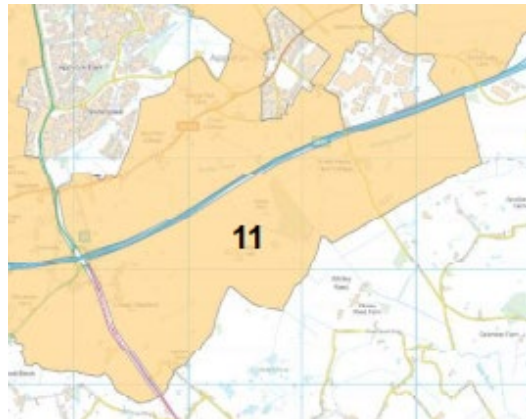
44) This 2021 proposal to now include both parcels of land are completely against the wishes of the residents of Stretton. Considering the original proposal was somewhat acceptable to use the East site only, to now include the West site will completely overwhelm the village in an unbalanced and disproportionate manner which is completely against the policies of the NPPF July 2021.

Green Belt Assessment and reclassification

45) 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 Arup & Partners General Area classification of Area 11, which encompasses Stretton, classified the area as a moderate contributor to the prevention of urban sprawl, as shown in Figure 11 below.

Figure 11 - Arup & Partners General Assessment area 11



- 46) The report concludes that the **defined new durable** boundary should be the M56, but this appears to be inconsistent not only with previous Green Belt reviews but also with other defined areas in the report whereby Stretton Road is the historical durable boundary.
- 47) In figure 12 the Choropleth map shows a major part of land north of M56 as weak and the land to the south of the M56 as moderate but this conflicts with figure 11 which shows all the land to the north and south of Stretton Rd being a moderate contribution. Inconsistently, the land to the south of Stretton Rd apart from the Stretton settlement is not classified at all, as seen in figure 14 which shows the Wallace land area R18/088 east and west as also not included in the parcel assessment.



Figure 12 -. Choropleth mapping showing results of General Area Assessment (2016)



Figure 13. Choropleth mapping showing results of Parcel Assessments (2016)

Figure 14 - Green belt Assessment Appendix F (2016)

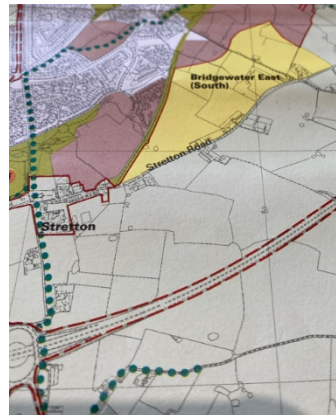


48) This shows a high degree of inconsistency to land parcels within Stretton, especially parcel R18/088.

Current and previous Green Belt boundaries

49) For the past two decades, and even longer the Green Belt durable boundary for this area has been Stretton Rd as seen in figure 15. below

Figure 15 - Warrington UDP 2001 green belt durable boundary



50) The Arup & partners 2016 Assessment Report is very detailed and based on the requirements of the NPPF and incorporates the recommendation of the Planning Advisory Service (PAS). However, this is a self-assessment checklist and as the authors readily admit that many of the decisions are based on “subjective judgements” and in this respect the decision regarding the general classification of area 11 and the parcel classifications is open to question. Furthermore, the assessments need to be subject to common sense consistency, something which is not evident in figure 16 below.

51) Green Belt Assessment document entitled 'Garden Suburb Options Final for Issue 1 April 2021' has now changed the land parcel reference numbers from R18-088 to R19/P2/013, furthermore, the later drawings as shown in Figure 13, Housing Option 2, refer to the sites as being R18/088E and R18/088W, East and West. This is a confusing and inconsistent numbering.

52) 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, as per Figure 16 below.

53) This seems coincidental and inconsistent in that the only reclassified parcel, and not included for Wallace development, has the most important outlook view which is seen upon entering the village, and that is the village church view over open countryside as approached from M56 J10 junction. This current 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.

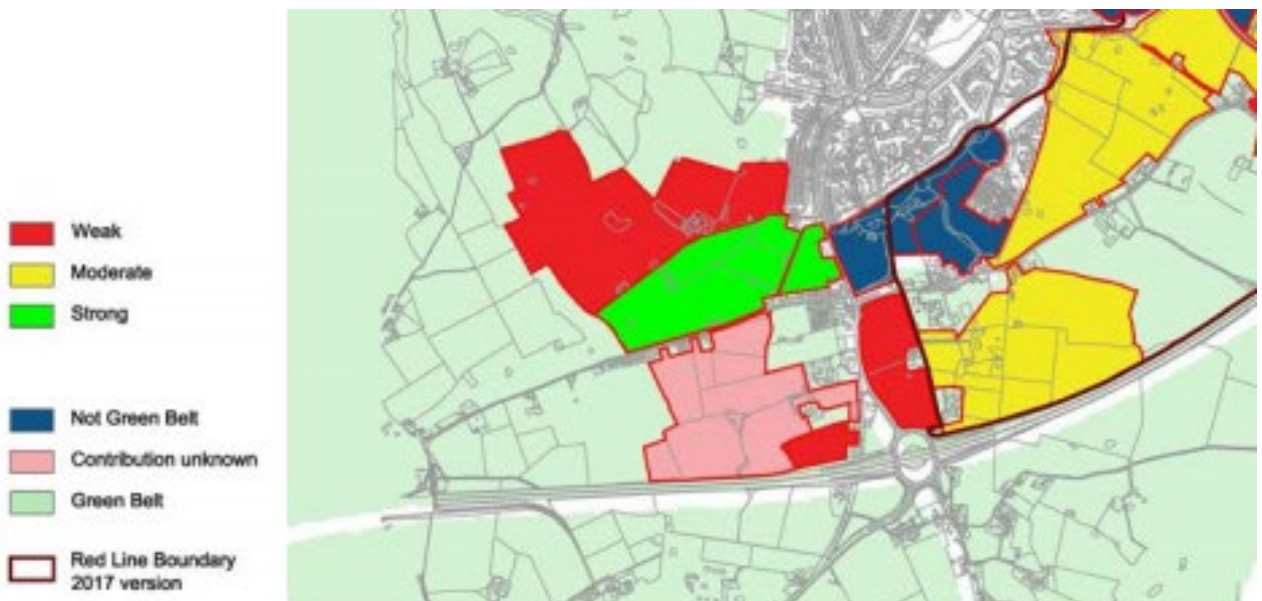


Fig 2.3: Green Belt Assessment

Figure 16 – reclassified green belt assessment (2021)

54) 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.

55) It should also be noted that the Arup & Partners Housing Option 2 still only includes R18/088 East as developable land, as seen in Figure 13 below.

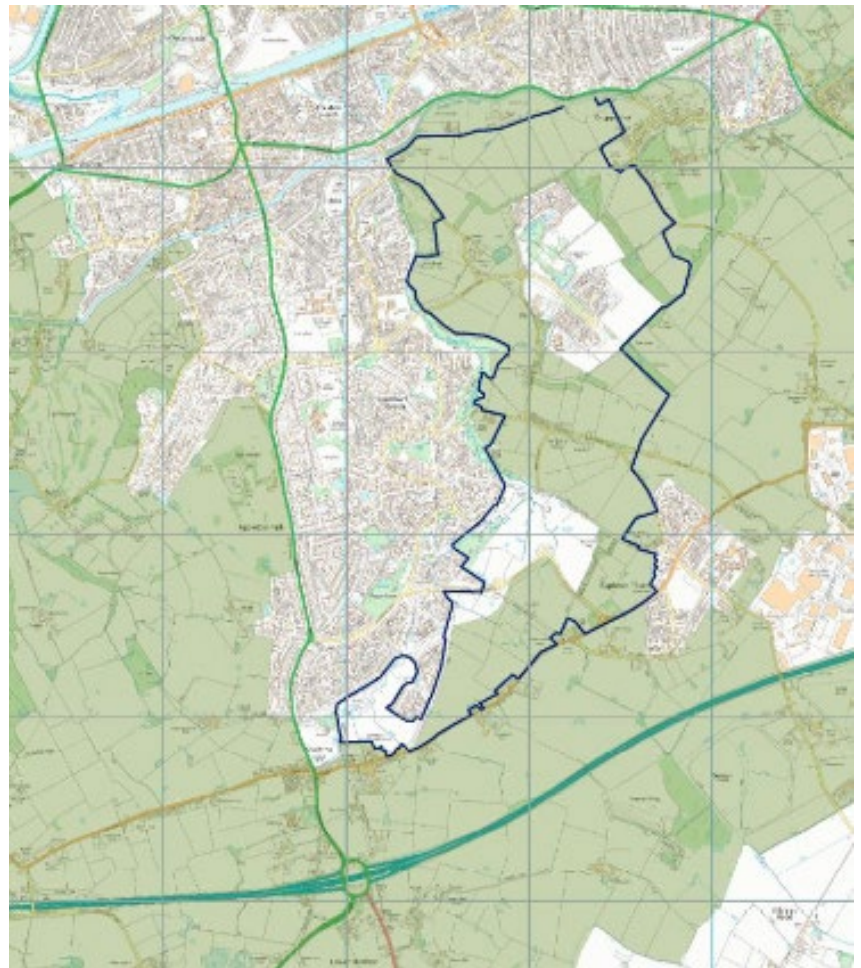
Enduring and permanent green belt boundaries

56) The Green Belt Assessment by Arup & Partners (April 2021), included in the local plan supporting documentation shows four housing options for the green belt area. All options except Option 2 show the green belt enduring permanent boundary as Stretton Road, with no development to the south of that boundary, as shown in figure 17 below. This is consistent with many previous maps developed by the Warrington Unitary Development Authority since 1973.

57) Only Option 2 includes land south of Stretton Road. This land now included in option 2 is the Wallace Land Investments land parcel R18/088 (East and West) as shown in figure 18.

58) This land was included in Option 2 because it was beneficial to WBC so that the developer could fund the Strategic Infrastructure Road (SIR) which needed to be provided before any residential development could be undertaken, as defined by the local plan. The inclusion of this land parcel R18/088 is the only one remaining in the local plan south of the durable boundary of Stretton Road and should not be allowed as it does not constitute exceptional circumstance to release green belt land. It has been done purely to the advantage for both the developer and WBC at the expense of high-quality Grade 2 and 3 agricultural lands. The current enduring boundary should be maintained and any development south of Stretton Road should not be allowed.

Figure 17 – Housing Option 1 (2021) complies with existing durable boundary



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

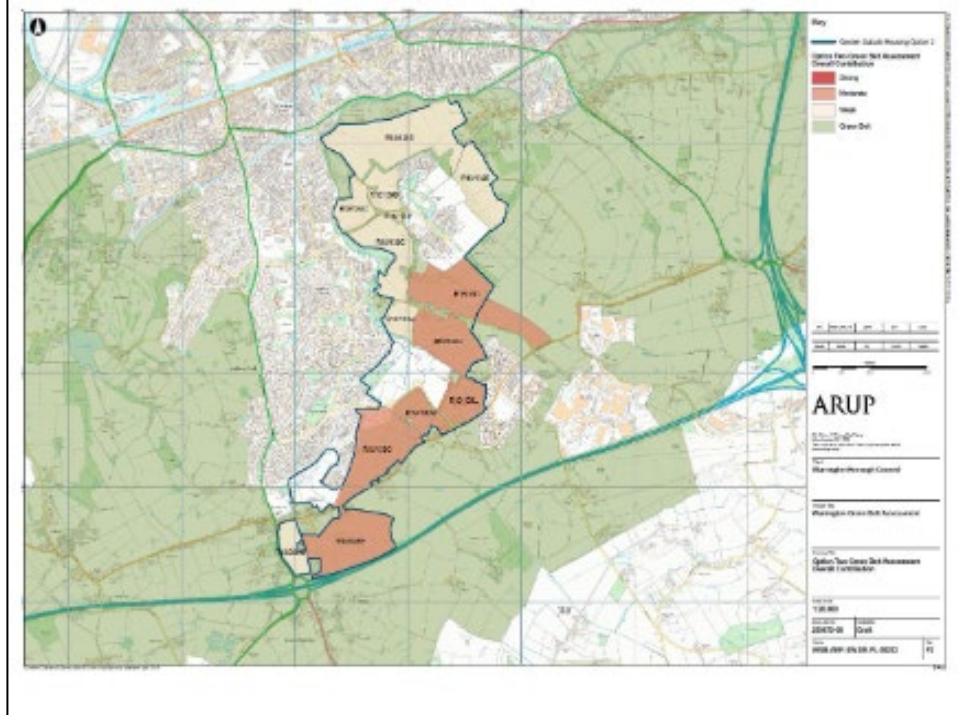


Figure 18 – Housing option 2 (2021) showing Wallace land to the south of the durable boundary.

3. Green Buffer Zone Inconsistency

- 59) Reference must be made to the PDO plan for Stretton whereby site R18/088EWest was not originally defined for development and was 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 2017 Regulation 18 consultation.
- 60) With respect to the green buffer zones indicated on the earlier concept maps, seen in figures 5 & 6, this green buffer zone to the East of Spark Hall Close is an acceptable barrier to any development and should be retained and included within the A2 proposed residential area shown in Figure 9.
- 61) The local plan maintains the historical significance Warrington and the view of St Elphins Parish Church. Warrington is not the only area of historical significance. Stretton has an equal history and the parish church is not the only historical object which needs to be considered as that which forms part of the green belt assessment criteria. Stretton village also has a long history and the character of the village. 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.
- 62) This section above highlights the inconsistent and inadequate solution for the green buffer zones around the village if indeed it were to be subjected to unjustified and disproportionate residential development.

GREEN BELT RELEASE CONCLUSION

- 63) It is clear that here has been an inconsistent approach to the green belt boundary throughout the development of the plan. The current enduring green belt boundary should be retained as being Stretton Road to the south and Spark Hall Close (King Street roman road) to the west. No green belt release should be outside those boundary limits.**
- 64) It is clearly evident that the inclusion of land area R18/088 West has and will be to the benefit between WBC and Wallace Land Investments. It presents a disproportionate and unjustified effect upon the village of Stretton and requires resolution to maintain the green belt.**
- 65) It is clear that during the maturation of the plan that there has been an inconsistent approach to green buffer areas to residential developments. It is important that these buffer zones be retained and are sufficient to protect the openness of the countryside and local historical features of Stretton.**

Objective W2 - 3.4 Exceptional Circumstances for Green Belt Release

66) The Updated Proposed Submission Version Local Plan (PSVLP21) proposal to release green belt for disproportionate growth in Stretton Village fails to comply with the latest version of the NPPF 2021 (July 2021) for the following reasons:

1. Sustainable Development (NPPF chapter 2)

- a) It fails to meet the **economic objective** insofar as the plan does not ensure that sufficient land of the right type and in the right places and at the right time.

This is evident by planning to take ALL the proposed Green Belt release in one whole swathe at the outset of the plan. The Spatial options evaluated in the plan do not consider alternative land sites which can be released throughout the duration of the plan period to relocate existing large footprint business enterprises with a high value land bank, e.g., Wickes, Selco, Handwash car businesses within the centre of the town. Utilization of these sites and other suitable sites, over the plan period to provide higher density housing or flats will contribute to creating a healthier and more vibrant town centre area and will revitalise the Warrington's vision to improve the town centre area. This alternative approach to spacial utilisation will alleviate the need to remove green belt. The added benefit to relocating these types of businesses to an out-of-town commercial location will be a reduction in vehicle movements within the town centre and the consequential reduction in town centre air pollution.

- b) It fails to meet the **social objective** insofar that the whole of the proposed South East Warrington Urban Extension (SEWUE) completely fails to provide, through the Local Transport Plan 4 (LTP4), the accessibility of services requirement. There is no credible plan to provide any improved crossings over the Bridgewater Canal, whereby 19th century infrastructure cannot support 21st century needs at the present time, let alone when the proposed increase in the number of houses planned for green belt release will materialise. Furthermore, it fails to protect the characterful villages of south Warrington by removal of open spaces within the green belt, resulting in urban sprawl.

- c) It fails to meet the **environmental objective** insofar as it will significantly increase air pollution throughout the south Warrington conurbation. Warrington is already on the WHO list of highest polluting towns. The unbalanced number of residential developments proposed by the plan will result in significant numbers of vehicles added to the already congested road system. Furthermore, the proposed commercial area at Barleycastle with the 6/56 proposal will introduce yet further air pollution throughout south Warrington. This is wholly against both the government's current climate change and air pollution proposals and movement to a low carbon economy. The plan fails to address these requirements.

2. Plan making (NPPF Chapter 3)

a) It fails to meet the **plan making objectives** by not including any deliverable or sustainable plan with sufficient detail on sustainable transport solutions. It in fact promotes the construction of a Strategic Infrastructure Road (SIR) route through residential areas which, according to WBC highways staff, is also intended to cater for HGV's between M56 J10 and the Barley Castle trading estate and 6/56. This is a flawed concept which will result in high vehicle movements passing by neighbourhood centres and proposed new schools. The plan does not provide sufficient detail on proposed residential housing developments, in fact the plan relies heavily on developers to fund and determine detail plans.

b) **Examining plans** requires them being Positively prepared, Justified, Effective and Consistent with national policy. The dogged determination of WBC to pursue the release of green belt, through three maturations of the Local Plan (2017- PDO, 2019-SVLP and now the 2021 USVLP) has highlighted the blinkered approach and poor decision-making process of the plan making system. The plan is neither justified or consistent with national policy. Furthermore, it transgresses the decision making of Public Enquiries of previous local plans (ref 1973 Warrington New town) which fixed future limits of housing developments.

3. Delivering a sufficient supply of homes (NPPF Chapter 5)

a) **Identifying land for homes** has been clearly undertaken within the evidence of the original 2017 local plan 'Call for Sites' exercise in 2016. However, the latest change from the 2019 submission and the current 2021 updated version has clearly removed some green belt uptake but it has also removed other parcels of land now excluded in the land supply. The NPPF recommends that these small and medium sized sites make an important contribution to meeting the housing requirements. There is no evidence that the Local Plan is reusing any of these land parcels and that planning is just relying on the wholesale release of green belt. This omission is against NPPF guidance.

NPPF guidelines also define the use of brownfield land and vacant buildings where they can be reused or redeveloped. Evidence of maximising brownfield sites has not been clarified.

b) **Maintaining supply and delivery** is a strategic policy but one based upon a five-year period whereby the rate of development should be considered on an annual basis to support the housing trajectory. To blindly require the release of the entire proposed green belt in the first year of the plan is clearly land banking land which potentially may not need to be built upon. It unjustifiably releases green belt. The Local Plan fails to take this NPPF requirement into consideration.

4. Ensuring the vitality of town centres (NPPF Chapter 7)

This NPPF requirement has been somewhat incorporated into the local plan. However, Warrington urban area has many vacant or disused properties which are suitable for acquisition for affordable

residential development, many being in or around the town centre area. This spacial concept should be employed which will bring significant social vitality and viability to the requirement for a more progressive town centre environment and community. It will enable a more balanced residential housing uptake and reduce or negate the release of green belt. There is little evidence within the plan whereby this NPPF requirement has been considered.

5. Promoting healthy and safe communities (NPPF Chapter 8)

The USVPLP fails to consider this NPPF requirement in its approach to community and Social Wellbeing as defined in the plan policies: W1 - Retail and Leisure needs, W4 – Warrington’s community Facilities and W5 – Open Space, Outdoor Sports and Recreational Provision. It excludes any reference for the provision for **indoor** social, cultural and recreational facilities for the variety of indoor activities required within a balanced society. This requirement needs to addressed.

6. Promoting Sustainable transport. (NPPF Chapter 9)

The adopted Local Transport Plan LTP4, which is supposed to compliment the UPSVLP does not support the requirements of this NPPF requirement with reference to the SEWUE.

Sustainable transport as described in the LTP4 has been the subject of a separate submission document. The report highlights the total inadequacy of LTP4 transport proposals for south Warrington and the proposed SEWUE. There are no plausible plans for any sustainable transport links for the benefits of residents of south Warrington across the Bridgewater canal. This being a 19th Century infrastructure catering for 21st Century requirements.

Albeit the local plan highlights new cycleway and walkway routes within the SEWUE it excludes any plans to improve these routes over the Bridgewater Canal or Manchester Ship Canal.

The sustainable transport plans are woefully inadequate and render south Warrington as a physically separate entity from Warrington town centre and environs south of the Manchester Ship Canal, River Mersey and Bridgewater Canal.

7. Making effective use of land (NPPF Chapter 11)

The plan fails to **make effective use of land** currently used in the central town areas as described in section 4 above. The NPPF requires plan making bodies to be proactive in identifying suitable sites, even those held in public ownership using the full powers available to the planners. Central town businesses with large carparks and warehouse areas should re utilise these areas for higher density affordable housing. This in turn will bring vitality and viability to the housing numbers required. This approach will reduce or remove the need to release green belt. There is no evidence that the local plan has taken this approach into consideration.

The plan also fails to **achieve appropriate housing densities**. The estimated housing density generally throughout south Warrington is circa 15 – 20dph and as low as 11dph in some higher priced areas.

The new Pewterspear Green development in Stretton has a housing density of circa 28 / 29dph. On inspection of this development the housing stock is very tightly arranged and does not integrate well within the community.

The Local plan Housing policy DEV1 (4.1.23) states that a density of less than 30dph should be discouraged. This parameter is not appropriate for the SEWUE area and densities should reflect the appropriate accessibility. This fact is vitally important given the lack of planned roadway infrastructure improvements across the three main waterways.

8. Protecting green belt land (NPPF Chapter 13)

The local plan fails to meet the requirements of the five purposes, defined in the NPPF, which serve to protect the green belt for the following reasons defined by: -

Clause 137:

- a) It fails to assist in safeguarding the countryside from encroachment.
- b) It fails to preserve the setting and special character of our historical town and villages.
- c) It fails by not utilising the recycling of derelict and other urban land.

Clause 141:

- a) The plan fails to make as much use of available brownfield or underutilised land. This is evidenced by the fact that spacial strategic alternatives in the utilisation of areas of land and buildings within the towns urban area have not been fully considered, as described in sections 4 and 7 above.

Clause 142:

- a) The plan has removed large and small parcels of land from the plan as published in 2019 (PSVLP). That land is obviously still available for housing yet the focus remains on releasing the wholesale amount of green belt within the SEWUE as the easy solution. This is a flawed proposal as this approach does not constitute an exceptional circumstance to release green belt.
- b) The release of green belt is inappropriate as evidenced above.

Clause 143:

- a) The green belt assessment defining the two parcels of land under R18/88, namely East and West, have had their assessment weighting revised from the 2019 assessment. Specifically, the East site has been upgraded to 'moderate' from 'weak', yet it is still proposed for development. This shows inconsistency in policy and it is unclear as to why this is and there surely can be no material change to the site to warrant such a revision.

Clause 144:

- a) It fails to further restrict development, especially within the village of Stretton whereby currently a recent new private development increased the number of dwellings within the village by 40%, from originally 450 up to 630. The SEWUE will increase that by over 100% bringing the village to approximately 1500 dwellings. This is an unbalanced and unjustified increase and is therefore inappropriate development.

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.

The community of Stretton would appreciate it if this land was retained as green belt. The alternative connection point for the distributor road to be sourced from J10 M56 has already been communicated to WBC. A separate Appendix will address this proposal.

9. Conserving and enhancing the natural environment (NPPF Chapter 15).

Clause 186:

The local plan clearly does not comply with the requirement of clause 186 with the requirement to protect the population from increased air pollution. In fact, it specifically proposes a residential and commercial solution that will significantly increase levels of air pollution through the introduction of potentially thousands of additional cars and HGVs throughout the SEWUE area.

Over the past 12 months Stockton Heath Parish Council has been monitoring the quality of air within their village. The data reveals that during peak periods contaminants (PM2.5 and PM10 – harmful to public health and the environment) are considerably higher than the current World Health Organisation (WHO) recommendations. It must be stressed that the readings included ‘COVID’ lockdown periods and it is therefore reasonable to assume the results would have been significantly **HIGHER**, for normal times. Based upon this information it is also reasonable to assume that Latchford Village, which the A50 runs through, will also have similar levels of pollutants as HGV traffic is considerably higher in this location.

The Council are aware of the landmark Coroner’s decision in December 2020 in reference to the death of 9-year-old Ella Kissi-Debrah in 2013 due to acute respiratory failure that was attributable to the exposure of air pollution. The coroner said Ella was exposed to nitrogen dioxide matter (PM’s) pollution that was in excess of WHO guidelines, the principal source of which was traffic emissions. This legal

precedent is a seismic shift towards the pace and extent Government, Local Authorities and Clinicians must work together to tackle the country's air pollution health crisis.

Based upon the above how can the Council put forward a local plan which will add thousands upon thousands of vehicular movements daily onto the A49 and A50 which will further exasperate air pollution issues in both Stockton Heath and Latchford villages? The Council have a duty to take reasonable care in ensuring and safeguarding the health and wellbeing of its residents and any decisions or actions by a Local Authority must not be in isolation of these key parameters. These proposals are unethical and not in line with the Governments Clean Air Strategy 2019.

10. Conserving and enhancing the historic environment (NPPF Chapter 16)

Stretton village, specifically, 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. As a point of note the new Pewterspear Green development is split into two halves named Saviours Place and Kings Quarter in deference to Stretton's ancient history.

The local plans proposal to significantly increase the housing stock in Stretton does not align with NPPF policy in protecting Stretton Village by way of conserving the local environment. Such a development definitely will not enhance the environment but significantly destroy the characterful ambience of this beautiful rural village.

DEV1 – HOUSING DELIVERY

68) The housing figures stated in Appendix 1, Housing Trajectory, bear no resemblance to either the trajectory graphs in either the 2017 or 2018 SHLAA reports. It also has to be questioned as to why the two SLAA reports, issued just one year apart, can report such largely differing figures. Furthermore, Appendix 1 stated that over the 20yr plan period the total house build will be 20284 whereby the housing requirement stated in policy 1 is for 18900.

69) The statement regarding deliverability and its review within the first 5 years is wholly contrary to the NPPF guidelines. It is no use taking the green belt and then deciding 5 years later that it was not a warranted decision. Green belt should only be taken as and when it is justified under exceptional circumstances. This is an excellent demonstration as to how WBC views the wholesale release of the green belt being an acceptable route to land banking and looking at the Garden Suburb as an easy solution without realistically using all other available options for housing development before any green belt usage. Any Green belt release in Stretton should be kept to an absolute minimum.

70) The number of houses proposed to be built in Stretton by reference to the above map, i.e. parcels A1 - 96, A2 - 170, A3 - 146, A4 - 254, A5 – 180 (already under construction), A12 – 119 giving a total of 965. The extra houses would more than triple the current village size ~450 within in the existing designated boundary. A6 – 595 is technically outside Stretton Village, but within concept Village A. An additional A6 -595, gives potentially 1560 new houses would be over 2,000 houses, which more than quadruples the existing local area housing accommodation. The scale of this proposal is unsustainable and will destroy any resemblance to the rural and countryside character of Stretton Village.

71) We do not support clause 4.1.23 regarding a minimum housing density of 30dph. The average dph in south Warrington is circa 25 dph. The new Pewterspear green density is 28 / 29 dph and that looks a tightly designed layout with very little or no frontage to houses. Any residential development within Stretton needs to have a housing density of **a maximum** of 30dph.

72) Conclusion: The data supplied to support the stated housing delivery requirement is flawed and cannot be relied upon to demonstrate a credible plan for the village of Stretton. The plan is unsound by way of scale and massing.

73) We do not support the extent of housing total proposed in UPSV for Warrington, nor the extent allocated to Stretton, and the local area immediately adjacent.

DEV3 – GYPSIES AND THE TRAVELLING COMMUNITY

74) South Warrington already has a large number of privately-owned permanent gypsy or traveller and show people sites, some of these are within the village of Stretton. WBC should not permit any further applications for such sites within Stretton if permanent provision is to be made elsewhere within any Garden Suburb. Any such permanent site needs to be located away from the main residential areas and with discrete green buffered boundary treatment.

75) It is generally accepted, even though not looked upon favourably from a location viewpoint, that the permanent type of gypsy facilities housing socially compliant residents does not present a community liability. However, it must be stressed that a transit encampment for the migrant travelling gypsy community should NOT be provided within Stretton or any wider Garden Suburb. Stretton community and WBC has already suffered from criminality and social disruption due to abusive and threatening behaviour by transient members of the gypsy community requiring Police and legal enforcement with subsequent clean-up costs incurred by WBC. This must be avoided at all cost within Stretton and any Garden Suburb.

DEV 4 - ECONOMIC GROWTH AND DEVELOPMENT

76) The policies generally defined for economic growth and development within existing urban areas, which are key to the improvement in the overall wealth of Warrington are laudable. However, an over optimistic vision for large scale logistic and commercial development would clearly appear to be primarily driven by the financial advantage afforded to high profile property development companies which is to the detriment of the community. For these reasons alone justification to take green belt for this requirement is not acceptable as it does not meet the conditions of 'exceptional circumstance'.

77) The need for wider strategic employment areas, especially in areas proposed to be removed from the green belt in South Warrington, e.g. Barleycastle trading estate, are not justified from both a population increase or probably from an employment remuneration viewpoint. Furthermore, they will probably not be to the economic advantage to the surrounding community. Employment created by logistics and warehousing, which nowadays is highly automated, use fewer employees and generally employ low technical grade employees. It is highly likely that they will not be paid sufficient salary for them to afford the types of property in any Garden Suburb, those types which will be financially favoured by WBC and developers in any Garden Suburb in order to maximize revenue gain. Furthermore, it is highly

78) likely that these employees will live outside the borough thus adding to commuting traffic. The Barleycastle scheme should not be implemented specifically in this proposed employment area. Growth on the proposed scale of the Barleycastle development cannot be justified for exceptional circumstance for the area to be removed from the green belt. Furthermore, the effect on Stretton will be dramatic as commercial and heavy goods vehicles will preferentially use the Strategic Infrastructure Link from the A49 over to the A50 and onward to the Barleycastle employment area. This will bring more noise, pollution and congestion to the infrastructure within Stretton. There is already a large amount of vacant commercial premises advertised around Warrington. The detailed assessment (evidence) of currently available premises and capacity is not robust, and therefore the assumptions of need for further strategic employment land is overstated and not sound. It is risible that WBC is supporting proposals for release of green belt land for employment use, notable for major logistics companies bring HGVs, while stating in the Transport Plan the aim for Freight Management to use other forms of transport.

79) From information taken from the LTP4 it would appear that traffic modelling for the combined additional HGV, LGV and domestic traffic which will result from proposed residential and commercial developments around the whole of the proposed Appleton and Barleycastle trading estate and any Garden Suburb has not been satisfactorily considered as part of the evidence supporting the plan.

DEV 5 – RETAIL AND LEISURE

80) The proposed PSVLP21 Plan clearly caters for outdoor sports and recreational facilities, walking and cycling. However, it completely omits facilities and accommodation in the SWEUE to cater specifically for indoor sporting and other community activities for young and older people, the disabled and the disadvantaged.

81) These facilities are completely lacking as they are not included anywhere within the local plan. This non-specific exclusion is not even considered or made provision for in the policy DEV6 'Warrington's Quality of Place'.

82) The provision of indoor sporting and other community facilities for a large and varied set of activities for young and old residents is essential and paramount in maintaining and enhancing the social wellbeing of existing and new proposed residential areas within the SEWUE.

83) What is required is suitable multi-functional or separate indoor facilities which will provide for typically the following sports clubs and wider range of social activities which have not been catered for in the Local Plan:

- Scouting & Guiding
- Youth Clubs
- Amateur dramatics

- Martial arts
- Yoga and other health style activities.
- Art and craft groups
- Dances and other social functions

84) Many of the existing facilities for the current limited range of activities provided are already at maximum capacity and have no room to grow with the proposed increase in local population throughout the SEWUE. The Local Plan is unbalanced and unsound in its approach to providing more retail and large leisure facilities as opposed to the extremely important need for local community-based activities which provide health and wellbeing for local communities.

OBJECTIVE W1 – Section 4.3 - Retail and Leisure needs

85) ‘Meeting Warrington’s Retail and Leisure needs’ is specifically focused on retail shopping and leisure facilities in district centres, neighbourhood and local centres. Albeit that the South East Warrington Urban Extension (SEWUE)

86) Policy DEV 5 refers to sustaining and supporting the health and wellbeing of local communities within the various centres but it does not include any requirement by developers to provide suitable indoor activity accommodation for activities described above. This needs to be included in this policy.

OBJECTIVE W4 – Section 7.4 – Warrington’s Community Facilities

87) It is refreshing to see that policy INF4, specifically in ‘General Principles’ sections 2 d and e, that it addresses the requirements of social or community infrastructure. However, to comply with promoting health and wellbeing, as stated in section 1, it should require developers to include the requirement to provide buildings for indoor accommodation for activities described above. This needs to be included in this policy.

OBJECTIVE W5 - Section 8.5 – Open Space, Outdoor Sport and Recreation Provision

88) Although this section refers, in the main, to outdoor Sports and Recreation facilities it should not be limited to outdoor pursuits. Indoor sporting activities such as those outlined further above should be included in this section in order to make a fuller and more comprehensive provision for all sports across the spectrum of activities. To that end, the requirement for buildings to be provided for indoor sporting activities should be a fundamental requirement for any residential development or neighbourhood area. Policy DC5 therefore needs to include this requirement.

DC1 - WARRINGTONS PLACES

89) Stretton village is an inset green belt settlement, as per policy GB1. Therefore, the village A encroachment of the proposed Garden Suburb residential development should not be

allowed within the designated area and the village of Stretton should be protected from inappropriate development as per policy GB1.

DC6 – QUALITY OF PLACE

90) Any Housing which is proposed to be built within Stretton as part of any Garden Suburb shall be required to strictly comply with this clause. Especially with respect to height. Housing should NOT be high rise and shall be limited to 2.5 storey high. The current three storey development at Henbury Gardens in Stretton is a classic example of what the community does not want to see again.

91) The following, of which many are central government climate change and environmental initiatives, shall be required to be incorporated in any new development whereby developers shall include the following items under the additional sub headings, in order to promote an efficient, ecologically and environmentally considerate development:

1. Access
2. Appearance
3. Landscaping
4. Layout
5. Scale.
6. Ecology and Environmental

1. Access

- 1.1 All houses shall be provided with a driveway for off road parking for a minimum of two cars. On road parking is to be designed out wherever possible.
- 1.2 Visitor parking areas for at least 3 cars shall be provided at some point along each primary road.
- 1.3 Garaging shall be provided within each property for a minimum of one car. Garages should be sufficiently large to allow a typical C-segment hatchback size vehicle to be driven fully into the garage and still be able to open the driver's door to get out of the vehicle comfortably
- 1.4 All Primary roadways shall have a pavement on at least one side of the road.
- 1.5 A turning circle provision shall be provided at the end of each no through road or private road for WBC waste vehicles or delivery vehicles.

- 1.6 A post box shall be provided within each development.
- 1.7 Primary roadways within a development shall be provided with street lighting utilising LED lighting fixtures.
- 1.8 Footpaths and public walkways within a development shall be provided with LED lighting fixtures to provide safety and security for pedestrians and cyclists.

2. Appearance

- 2.1 No housing units shall exceed two and a half storeys high. A maximum of 25% of houses shall be two and a half story high.
- 2.2 All houses will be serviced with underground telephonic, television reception and broadband internet facilities. This is to avoid unsightly externally mounted satellite dishes.
- 2.3 All houses are to be provided with concealed wheelie bin storage facilities such that bins are not permanently in general view.
- 2.4 The architecture of all dwellings shall be similar in design to the surrounding existing developments and have some defining features.
- 2.5 All houses shall have a complete outer skin of brick or stone. External wooden cladding shall not be provided as they suffer from high maintenance.

3. Landscaping

- 3.1 Footpaths, cycle ways and public walking routes shall be provided throughout a development such that they provide a means to connect and link up to adjacent new or existing developments, private roads within a development and any established Rights of Way.
- 3.2 Adequate dog dirt bins shall be provided along public walking routes throughout the open spaces and green corridors.
- 3.3 Adequate tree planting shall be provided along all primary and private roads. Preferably they shall be blossom trees.
- 3.4 All houses shall have a front garden.
- 3.5 All houses shall have a back garden.
- 3.6 All roadways shall have grass verges.
- 3.7 All roadways shall be tree lined.

4. Layout

- 4.1 A Pedestrian crossing to be provided across the primary road entrance to any development.
- 4.2 At least one Bus stop lay by shall be provided adjacent to the primary entrance road for each development.
- 4.3 All developments which are adjacent to each other shall have interconnecting walkways and cycle ways to avoid developments becoming isolated communities.

5. Scale

- 5.1 The height of the tallest point of any roof line shall not exceed 10M from grade level.

6. Ecology and Environmental

- 6.1 All houses shall be fitted with external electric vehicle charging connectivity.
- 6.2 All housing with a suitable roof aspect, generally facing south, shall be fitted with Solar Panels for electricity generation and/or thermal energy capture.
- 6.3 All houses shall be fitted with rainwater harvesting storage systems for use with toilet flush systems.
- 6.4 All houses to be fitted with basic building energy management systems with smart connectivity.
- 6.5 All houses shall include something form of low-carbon heating (heat pumps), district heating or combined heat and power system.

ENV1 – WASTE MANAGEMENT

- 92) The replacement Sandy Lane Recycling Centre to serve the South of Warrington must not be located within any area of Stretton village or anywhere constituting any Garden Suburb or upon land recovered from the green belt

ENV 2 – FLOOD RISK AND WATER MANAGEMENT

- 93) All of the many local ponds within any area of development shall be retained and incorporated within that development. Retention of these is to maintain the local waterway surface run off facilities and storm water attenuation, continue to provide habitat for local wildlife and to preserve the character of the local countryside and environment.

94) Any new development which has a boundary adjacent to any existing domestic property, or surrounds a set of existing properties, where those existing properties utilize onsite septic tank(s), shall make local connection provision for those existing properties to be connected to the new development foul sewage network.

ENV 7 – RENEWABLE AND LOW CARBON ENERGY DEVELOPMENT

95) Refer to additional items under DC6 – Quality of Place: specifically, item 6.2. Furthermore, all community buildings, however small their internal floor area is, shall also be constructed to accommodate solar power installations such that they can contribute to renewable and low carbon efficiency.

96) It needs to be stipulated that any proposed logistic developments or national distribution centres shall all be designed and constructed with rooftop solar power and hot water installations. These large roof buildings are ideal for renewable energy sources.

MD2 - SOUTH EAST WARRINGTON URBAN EXTENSION (SEWUE)

97) Notwithstanding the objection to the whole of the plan regarding the SEWUE to remove land from the green belt in the opening statement, the following are specific comments on the policy MD2 in the case that parts of the SEWUE is approved.

MDA 2.1 Key land Use and Infrastructure Requirements

98) There is a contradiction with the housing numbers as defined in Policy DEV1. There should be no allowance for the approximate additional 1800 homes to be built post plan period over and above those built during the plan period. This is an unnecessary and unjustified use of the green belt and can be considered as land banking.

99) Stretton is also an inset village washed over by the green belt and should be afforded the same considerations as Appleton Thorn. Stretton needs to maintain its distinct identity and any new housing should have a green buffer at the designated boundary to maintain countryside separation. Stretton has an emerging Neighbourhood Development plan and with agreement with WBC Stretton's developing policies as described within the comments against MD2 need to be aligned with any agreed future Local Plan.

MDA 2.2 DELIVERY AND PHASING

100) The strategic infrastructure road should not connect to the A49. As discussed below it should connect to the existing Stretton Fox pub junction, formerly the A559 Northwich Road M56 J10 exit.

MDA 2.3 DETAILED SITE-SPECIFIC REQUIREMENTS

New Homes

101) 35dph conflicts with policy DEV1 above. Any residential development in Stretton shall employ a housing density of a **maximum** of 30dph. New homes shall be a maximum of 2 ½ storey and be designed in accordance with the requirements of DC6 – Quality of Place.

Community Facilities

102) A new health facility should be provided for Stretton village. Funding must be in place before the start of any residential development and the facility operational before the development is completed. A new indoor recreational facility shall be provided within the neighbourhood centre.

Green Belt Boundary

103) As discussed previously, the durable permanent boundary to the south of the parish should be retained as Stretton Road. It should not be revised to the M56.

104) The green belt boundary to the west of any SEWUE shall be defined by Spark Hall Close (the roman road, King Street). A green buffer zone shall be provided eastward to the topographical ridge line. (This is as originally defined boundary limit of the SEWUE as defined in the PDO Reg 18). This will complement and preserve the historical significance of Stretton village. This is shown as originally defined in the UPSV concept maps shown above.

Transport and Accessibility -

105) Measures need to be implemented to stop HGV's from using the strategic Infrastructure link through residential areas. The connection of the strategic link at the western end needs be a single carriageway utilising the existing exit off J10 M56 currently only serving The Stretton Fox.

Utilities and Environmental Protection

106) Refer to additional items under DC6 – Quality of Place: specifically, items 6.2 – 6.4 regarding energy and water efficiency. Any renewable energy scheme must not include wind turbines within residential areas or within the Stretton parish.

107) To comply with the government and WBC climate emergency proposals and to mitigate noise and air quality pollution impacts within the SEWUE it should not allow the proposed large-scale logistics employment as described in policy MD6. This will exacerbate impending catastrophe of thousands of HGV and LGV vehicles using any SEWUE strategic infrastructure road system.

3. Strategic Infrastructure Road (SIR)

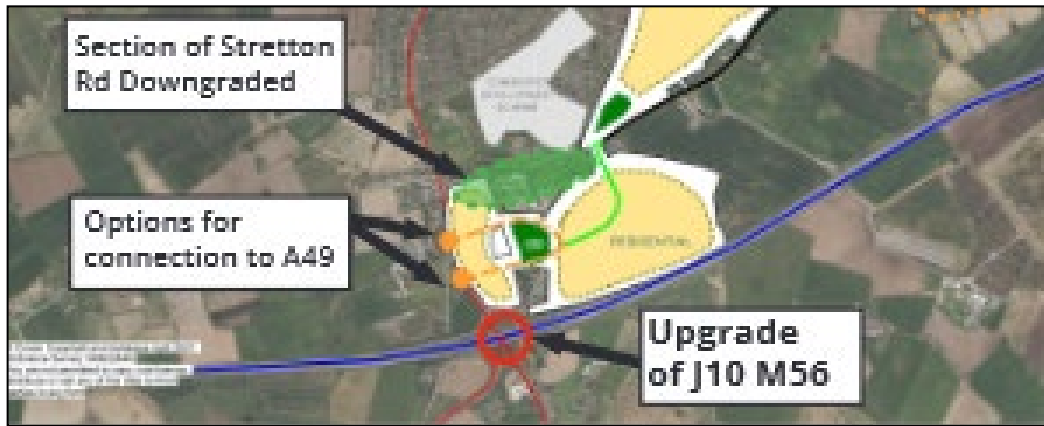


Figure19 – SIR connection point options (2021)

2.1 Cat and Lion Congestion proposal

108) The current proposal, as shown in Figure 19 above, to connect the SEWUE enabling infrastructure of the SIR to the A49 is **flawed and unsound**. The proposals are 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.'*

109) It is noted that there is very little detailed explanation as to what these proposed enabling works consist of and how the existing highway infrastructure will be changed to suit.

110) This enabling infrastructure proposal is flawed, unworkable and presents an increased potential for traffic congestion on the A49 from the Cat and Lion signal junction to Junction 10 of the M56. It also severely restricts local traffic accessing the immediate Stretton village facilities. Furthermore, it introduces health and safety issues for the emergency services accessing local residents.

111)The reasons are explained below, however the issue of traffic light timing at the Cat and Lion junction shall be excluded from these comments as they have supposedly already been previously optimised by WBC highways department.

a) It is unclear as to why the A49 round about junction at Longwood Road needs upgrading at an indicative cost of £1.06M (IDP) (developer financed). This roundabout functions well and does not present any traffic congestion.

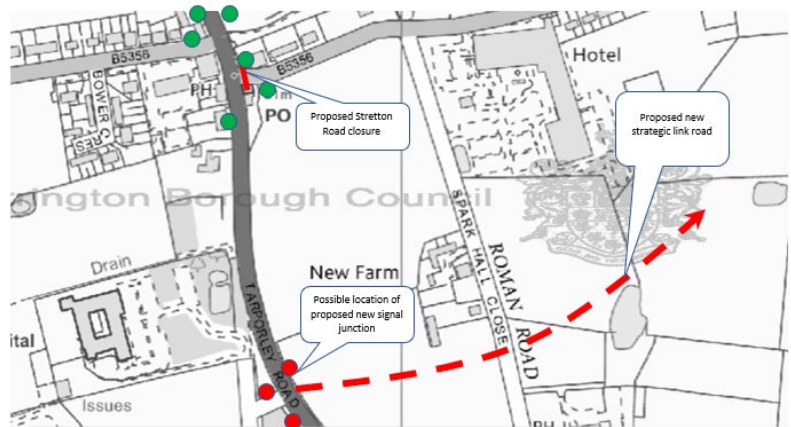
b) It is unclear as to why the traffic signal junction at Lyons Lane needs upgrading at an indicative cost of £2.83M (IDP) (developer financed). This signal junction functions well and does not present any traffic congestion

112)The main problem with the Cat and Lion signal junction, other than traffic density, is introduced by A49 southbound traffic turning right into Hatton Lane. The carriageway is not quite wide enough for two lanes and hence traffic turning right presents a blockage to traffic wanting to continue south hence creating congestion. Alleviation of this problem by introducing a right turn lane will significantly reduce congestion at this point and allow free traffic flow southbound. On close scrutiny this is entirely possible and the refusal of WBC to consider this is linked to the connection point and funding of the SIR.

113)It must be noted that there is not enough space for two defined lanes available for northbound traffic at the C & T traffic lights. Traffic already forms two lanes at this point, therefore a dedicated more suitable turn lane for traffic turning into Stretton Road needs to be provided.

114)The WBC new proposed signal junction for the proposed SIR, possibly located at Fir Tree Close / Spire Hospital entrance, as shown in figure 20 below, will most probably introduce further delays and congestion to increased traffic flows. This new signal junction will be approximately 300M from the C&L signal junction, and as close coupled signals will undoubtedly provide timing issues, as which is exemplified in Stockton Heath village, it will result in additional congestion and backing up to M56 J10. (Note that two options are shown on the WBC drawing in figure 19 for this connection)

Figure 20. Indicative Cat & Lion junction proposals.



115) The 'Stopping up' of Stretton Road with the existing junction with the A49, as preliminarily shown in red, is a flawed and **an unsound proposal** for the following reasons It may be that WBC relocate this barrier: -

- A) It will prohibit local village traffic easily accessing the school and extend journey distance.
- B) It will prohibit local village traffic accessing the Church and extend journey distance.
- C) It will prohibit traffic accessing the Park Royal Hotel and extend journey distance.
- D) It will prohibit local residents accessing their residencies and extend journey distances.
- E) Traffic wishing to cross the A49 from Stretton Road into Hatton Lane will be prohibited and will extend journey distance.

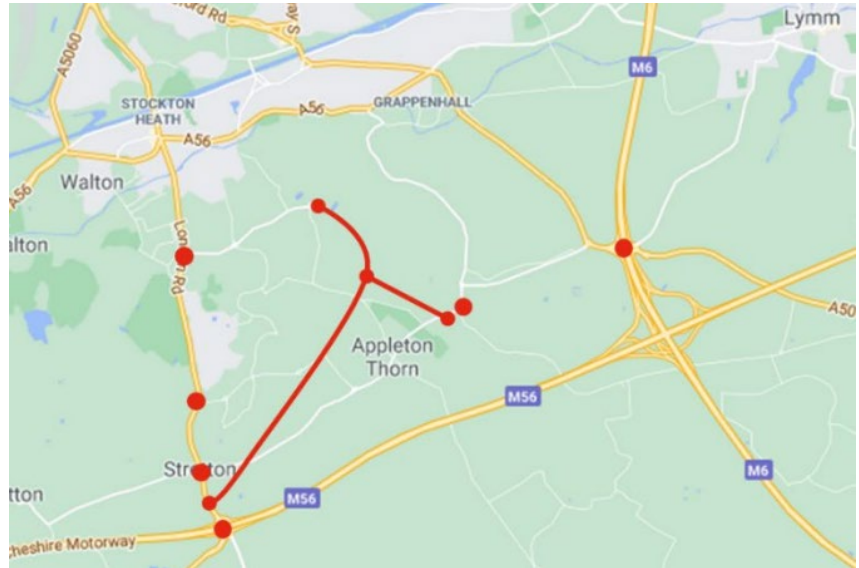
116) This all means that even more traffic will be using the A49 travelling south between the C&L junction and the proposed new signal junction for the strategic distributor link road.

117) It must be noted that this proposal is in contravention to the adopted Local Transport Plan (LTP4 Dec 2019) by increasing journey distance, increased air pollution, increased noise and totally to the detriment of the local community.

118) The stopping up of Stretton Road will also result in an increase reaction time to the emergency services. This is a blatant health and safety issue for local residents.

119) This new SIR, also referred to as the Cat and Lion Bypass or relief, is planned to meet up with the proposed new link roads between Witherwin Ave and Dipping Brook Ave, and Grappenhall Lane to Barleycastle Lane. This is defined in the Transport Model Testing document July 2021 as show on the map in figure 21 below.

Figure 21. Link road Connectivity (2021)



- 120) This has very serious implications for Stretton village and the rest of the proposed SEWUE as it opens up direct HGV access rat run between the M56 junction 10 and the propose 6/56 development and the whole of the Barley castle trading estate, thus bypassing the M6 J20 and therefore the current 7.5tonne vehicle weight restriction at Appleton Thorn. It is clearly against the guidelines and principles of LTP4 to allow HGV access through residential areas. This SIR needs to be weight restricted or suitably signed to prohibit HGV access to Barleycastle trading estate and 6/56.
- 121) The route highlighted in red in Figure 5 above and as indicated by the two options shown in yellow as see in Figure 6 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.
- 122) Furthermore, in recent conversations with WBC highways staff the question of phasing of the SIR delivery was raised. It was suggested that the first part of the SIR would be delivered by 2026 over the western R18/088 land parcel and that it would terminate at Spark Hall close. The second part of the road would be delivered at some future time to suite residential development phasing. The intention would be to open up and rework Spark Hall Close as a relief bypass for the Cat and Lion junction. This is completely unacceptable to the residents of Spark Hall Close, which is a sleepy no through road and enjoyed by many local walkers between the two halves of the village. It will destroy the popular thoroughfare. Planning is supposed to enhance the environment, not totally destroy it. **This is a completely flawed concept and a totally unsound solution.**

3. Alternative SIR location

Proposed amendments to the original Wallace plan

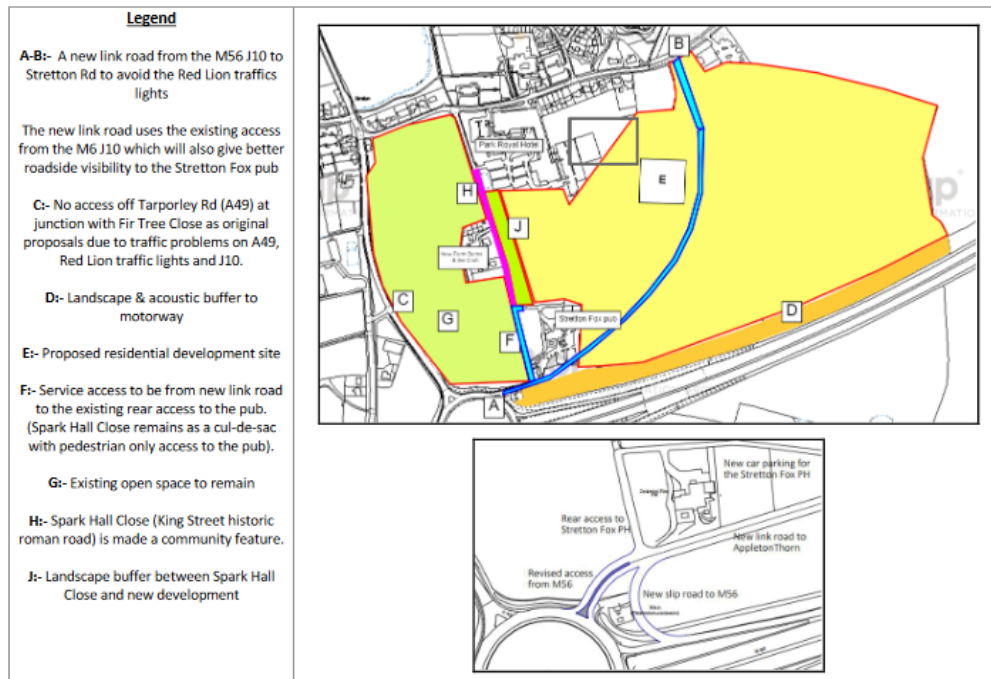


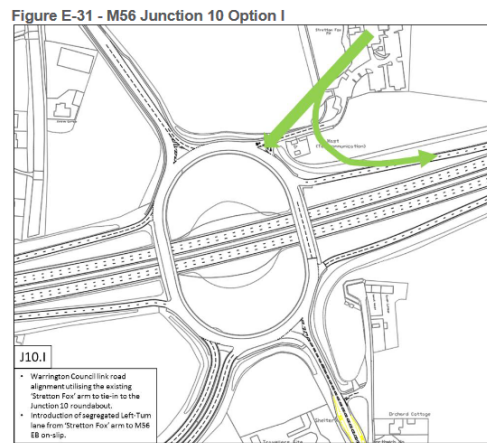
Figure 22 – Alternate Enabling Infrastructure SIR connectivity

- 123) There is of course another solution which has been tabled in the responses to the PSVLP (2019), 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 22 above and marked in blue.
- 124) 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.
- 125) 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.
- 126) 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. However, since that conversation the following has come to light through a Freedom of Information request as in the paragraph below.

- 127) The Highways England Baseline Report on J20 M6 and J10 M56 (Oct 2018) discusses various options to accommodate the deficiencies of the Cat and Lion junction and how modifications to M56 J10 can solve the problem. WBC has been given this report. It basically mirrors the suggestion we have previously given to WBC as in figure 22 above.
- 128) Using this Highways England extract from Appendix E Option I solution, as shown in Figure 23 below, would provide a simple solution to solve the Cat and Lion junction problem. Allow the R18/088 West land parcel to remain in the green belt, and provide service road access to the proposed residential development on R18/088 East.

**Figure 23 – Highways England Option 1
(Shown in green)**



- 129) 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.

4. SUMMARY AND CONCLUSION

130) In reference to our introduction, yes, progress is needed and Stretton needs to accommodate a sensible amount of development which our community can support, but at an acceptable cost to the community and countryside and historical significance of our community and environment. Stretton already has a new development of 180 homes (40% growth) which will bring greater demands upon the existing services and infrastructure.

131) WBCs own documents on proving soundness of the Local Plan means the UPSV needs to be:

1. Positively prepared: Providing a strategy which as a minimum seeks to meet our objectively assessed development needs
2. Justified: Providing an appropriate strategy which is evidence based. WBC must have considered reasonable alternatives in preparing the plan
3. Effective: The Plan must be deliverable over the plan period and be based on effective working on cross boundary strategic matters
4. Consistent with National Policy: including the National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance (NPPG)

132) Our conclusion, based on all our above comments and objections is that in each of the 4 criteria above that the soundness of the UPSV has failed and that parts the plan is in fact very unsound, specifically with regards to the Garden Suburb.

- Stretton MUST be protected from inappropriate housing development currently proposed at >300% increase in size.
- Stretton MUST be protected from unjustified release of the extent of green belt as the circumstances are not exceptional to justify the level of release proposed by UPSV.
- Stretton MUST be respected and treated as an individual community with its own green buffer.
- Stretton MUST be protected from an unsound LTP4 which will result in unnecessarily dramatic increase additional traffic.
- Stretton MUST be protected from additional pollution and noise as a result of an unsound LTP4.

133) The evidence and proposals presented by the UPSV and the adopted LTP4 do not provide credible justification for the detrimental changes defined which will dramatically affect Stretton.

134) Therefore, we do not support the UPSV and LTP4 adopted Transport Plan as standalone proposals, and that they are not matched to the WBC vision of a SEWUE for South Warrington, which dramatically impacts Stretton. Furthermore, the UPSV & adopted LTP4 do not adequately address comments made by residents during the previous consultations.

135) As an emerging NDP we value highly the opportunity to work with WBC in the formulation of a UPSV local plan which will be supportive of the development of our community and village of Stretton. We urge you and all who pass judgement upon the UPSV to work with the neighbourhood, communities and their representatives such as the NDP to achieve a solution acceptable to the majority, and compliant with the minimum legal requirements.

136) As the Stretton is so heavily impacted by the UPSV, if WBC decides to proceed to submission without further significant changes, we request that at any future hearing by the Planning Inspectorate, that the Stretton NDP Steering Group have the opportunity for a member to attend and participate.

Issued by Stretton NDP 15/11/2021