



Local Plan, Planning Policy and Programmes,
Growth Directorate,
Warrington Borough Council,
East annexe,
Town Hall,
Sankey Street,
Warrington WA1 1HU

Ref: Response to the Updated Proposed Submission Version Local Plan 2021 (UPSVP21)
Response No. 1 - NPPF

Dear Sir / Madam

In response to the local plan public consultation, I wish to submit my responses and objections to the local plan specifically addressed to policy MD2 – South East Warrington Urban Extension.

The proposals within this policy do not comply with the Aims of the Local Plan and supporting evidence. The following reasons, in this particular letter of objection, cover two crucial aspects as described below:

- None compliance with the NPPF.
- None compliance with Defra Agricultural policy

1. Policy MD 2.1 1 Key land use Release of green belt – Compliance with the NPPF (July 2021)

The release of green belt is contrary and inconsistent in Compliance with the NPPF for the following reasons:

1.1. 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.

1.2. 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.

1.3. 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.

1.4. **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.

1.5. **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 be addressed.

1.6. **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.

1.7. 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 car parks 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.

1.8. 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.

1.9. 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.

1.10. 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.

2.0 Policy MD 2.1 1 Release of green belt – Compliance with current Defra Agricultural Policy

The release of green belt is contrary and inconsistent in Compliance with Defra Agricultural Policy for the following reasons:

2.1 The Defra Agricultural Land Classification (ALC) for the area of green belt which constitutes the proposed areas of green belt release to satisfy the Warrington UPSVLP21 are shown in figure 1 below. The agricultural land is classed as Very good to Moderate. This equates to ALC grades 2 and 3. These are typical throughout Cheshire and comprise some of the better and more fertile areas of productive land for crop growing.

It can be seen from the map below that the majority of the land in the proposed local plan area is in fact Class 2, very good with a small proportion as class 3. It also has a classification of 2 as being some of the Best and Most Versatile (BMV) agricultural land in the area.



Figure 1 – UK Government Defra Agricultural Land Classification.

2.2 The Government **Guide to assessing development proposals on agricultural land** (Updated 5 February 2021) requires the following: -

- 1) Developers and local planning authorities (LPAs) should refer to the following government policies and legislation when considering development proposals that affect agricultural land and soils. **They aim to protect:**
 - **the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals**
 - all soils by managing them in a sustainable way

- 2) A Green Future: Our 25 Year Plan to Improve the Environment sets out the government’s 25-year plan to **improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:**
 - **protect the best agricultural land**
 - put a value on soils as part of our natural capital
 - manage soils in a sustainable way by 2030
 - restore and protect peatland

- 3) LPAs should use the NPPF to make decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- **consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land**
- prevent soil, air, water, or noise pollution, or land instability from new and existing development.

Conclusion

It should be clear from the above government criteria that the proposed Local Plan to release green belt land throughout the proposed local plan area is both unjustified and unsound. It will remove valuable agricultural land from productive food production and will cause untold harm to the environment. It clearly flies in the face of complying with the government's climate change initiatives and promoting a move to a carbon neutral future.

The Updated Proposed Submission Version of the Local Plan (UPSVLP21) as applied to Policy MD2 and the SEWUE is completely contrary to the principles of the NPPF to protect our environment. It is an unsound proposal and should be withdrawn in its entirety from the overall plan. The release of green belt should land not be allowed for residential development.

The following additional separate letters of response submitted by me addressing different but inextricably linked objections should be read together.

- Response letter No.2 – Green belt assessment issues
- Response letter No.3 – Green belt release for financial gain
- Response letter No.4 – Transport and Accessibility

Yours Faithfully

[Redacted Signature]

John E. Appleton

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