



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 (UPSVLP21)
Response No. 2 – Green Belt Assessment**

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 policies:

- MD2 – South East Warrington Urban Extension
- Objective W2 specifically policy GB1.

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 guidance rules is inconsistent and favours developers in the designation and weightings applied to certain parcels of land.

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

This particular letter of objection covers several aspects and reviews the three maturations (2017,2019 &2021) of the local plan to support the issues as described below:

- 1) The inconsistent approach to green belt assessment throughout the three maturations of the local plan.
- 2) The inconsistent approach to the proposed new permanent enduring durable boundary.
- 3) The inclusion of land parcel R18/088, specifically the western parcel.

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

- 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

Brief History

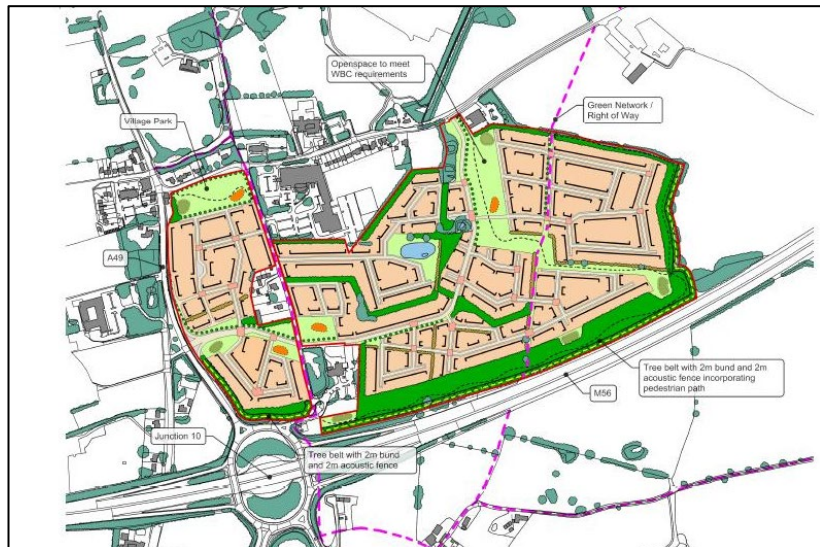
- 1) The residents of Stretton were first made aware of the proposal by Wallace Land Investments to build on land in Stretton in and around June 2017. This is when the Stretton Residents Association was formed in an attempt to protect our green belt and raise awareness of the proposal within the community. At this time the adopted Local Plan (2014) clearly protected large swathes of green belt in south Warrington, including the land in question.
- 2) Since then, WBC has issued the PDO, Preferred Development Option in 2017 which included the *South Warrington Urban Framework - Issued June 2017*. Following severe criticism by south Warrington residents pursuant to the Consultation period resulted in the issue of the Submission Version of the SVPLP, which included the *Warrington Garden Suburb Development Framework – issued March 2019*. This has now resulted in the current issue of the UPSVLP21 which includes Policies MD2 and MD6 appertaining to the revised plans for the *South East Warrington Urban Extension (SEWUE)*. All of which have a catastrophic effect on the Village of Stretton.
- 3) This letter of objection No.2 should also be considered along with my objection letter No. 1 re the NPPF and letter No. 3 re Financial Gain, as they are both inextricably linked, however, the letters are submitted separately to give clarity to the individual aspects of the objections.
- 4) This objection covers the maturation and changes of the Green Belt Assessment over the three issues (2017, 2019 and 2021) as it generally applies to south Warrington and specifically land parcel R018/88 (East and West).

1. Wallace Land Investments Proposal

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



Figure 2 – Wallace Revised Proposal (Feb 2019)



- 5) To set the scene as to why it is important to understand the green belt assessment inconsistencies 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.

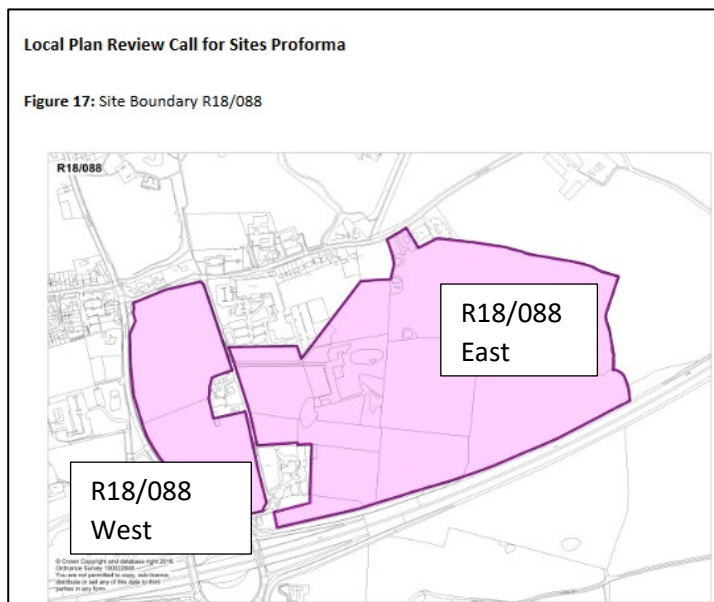
- 6) This proposal requires the release of green belt land which is classed as Grade 2 and Grade 3 agricultural land. This land has been productively farmed for many years and provides two main functions. The first being food production, but secondly it provides the openness of the countryside and the 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. This is explained in my letter No. 3 re financial gain for green belt release.

2. Inclusion of the Site within the local plan cycle

2.1 South Warrington Urban Framework - Issued June 2017

- 6) 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)

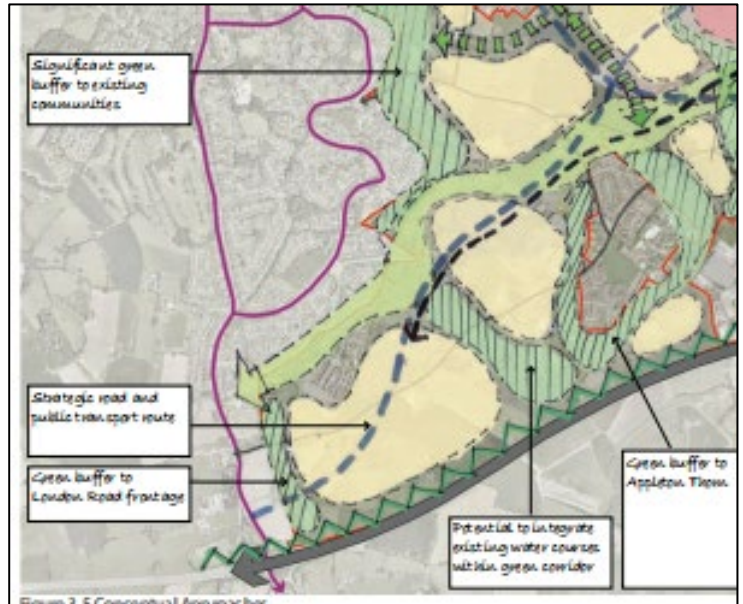


7) The 2017 issue of the local plan included a policy which defined the South Warrington Urban Extension (SWUE), that being the 'South Warrington Urban Extension Framework Plan Document – Final June 2017'. That document included conceptual layouts for the Stretton area. It showed, as in figure 4 below 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)



- 8) 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)



- 9) 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.
- 10) 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)

- 11) 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)

- 12) 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. Further information is to be found in my response letter No. 3 re unethical financial gain.

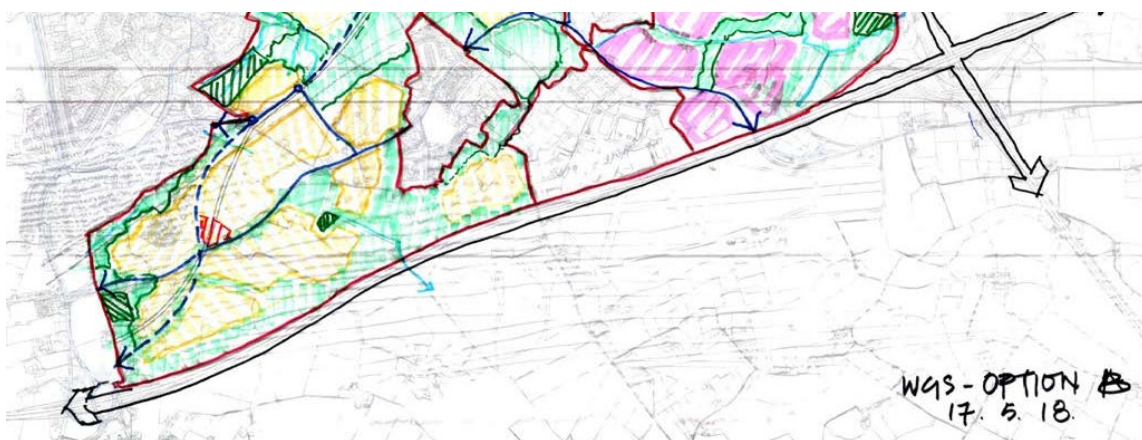


Figure 8 – Preferred Option B (2019)

13) 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.

14) 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.

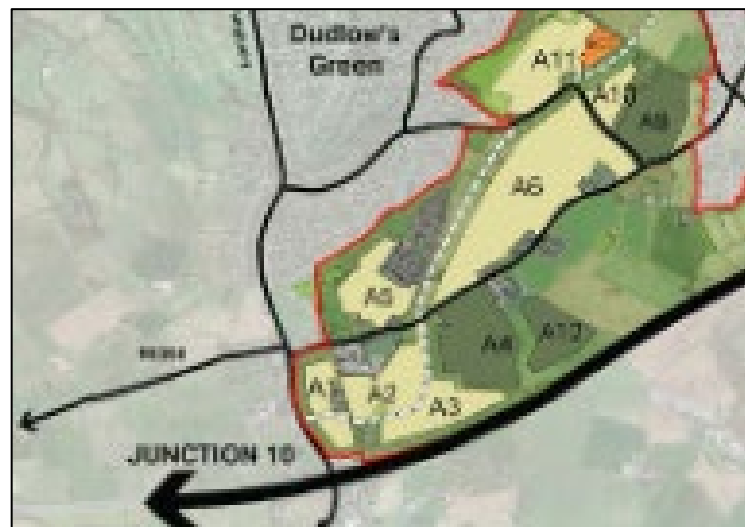


Figure 9 – Land Usage. (2019)

15) 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 and has been included following the Reg 18 response by Wallace Land Investments, as detailed in my response letter No 3 re financial gain.

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

16) 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.

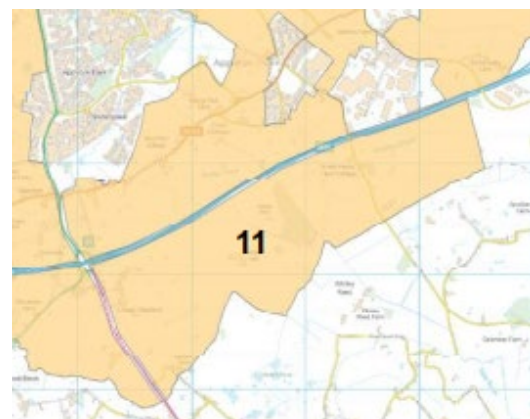


17) This 2021 proposal to now include both parcels of land are completely against the wishes of the residents of Stretton. Considering the original proposal was somewhat acceptable to use the East site only, to now include the West site will completely overwhelm the village in an unbalanced and disproportionate manner which is completely against the policies of the NPPF July 2021. Please refer to my response letter No. re non-compliance with the NPPF.

3. Green Belt Assessment and reclassification

18) 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



- 19) The report concludes that the **defined** 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.
- 20) 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)

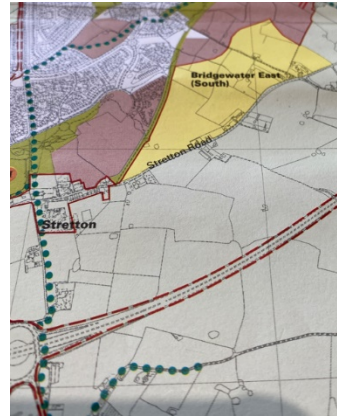


- 21) This shows a high degree of inconsistency to land parcels within Stretton, especially parcel R18/088.

Current and previous Green Belt boundaries

- 22) 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



- 23) 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.
- 24) Green Belt Assessment document entitled ‘Garden Suburb Options Final for Issue 1 23 April 2021’ has now changed the land parcel reference numbers from R18-088 to R19/P2/013, furthermore, the 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.
- 25) 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.
- 26) 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.

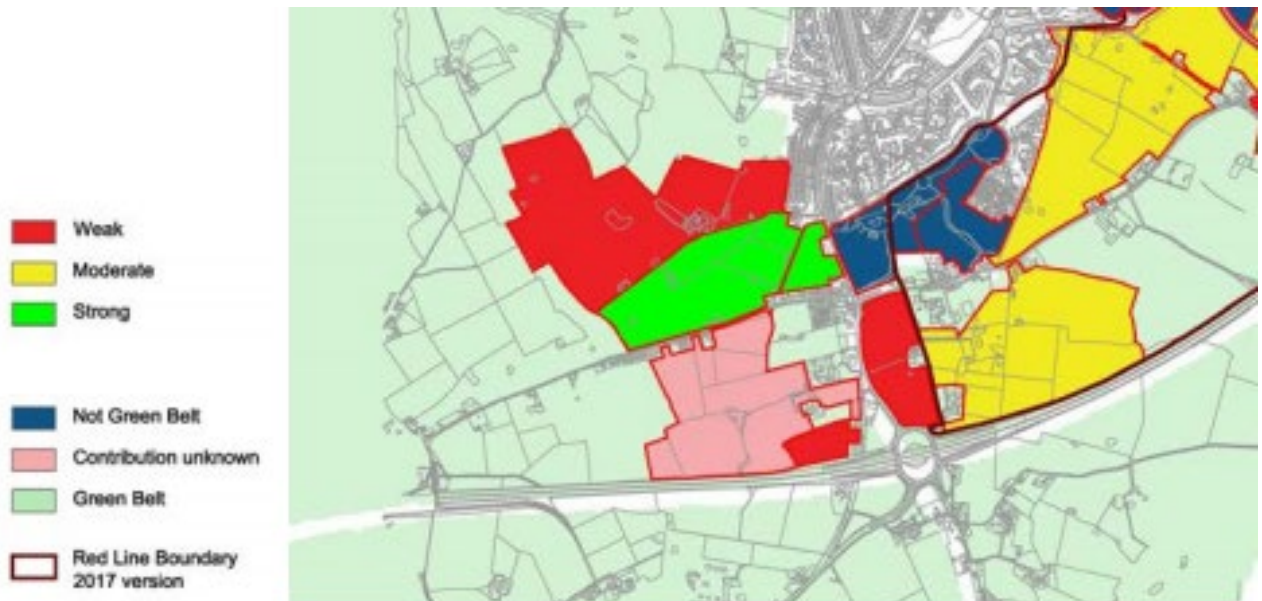


Fig 2.3: Green Belt Assessment

Figure 16 – reclassified green belt assessment (2021)

27) 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.

28) 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.

4. Enduring and permanent green belt boundaries

29) 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.

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.

30) 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. Please refer to my objection letter No. 3 re unethical financial gain. 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 for financial gain by 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.

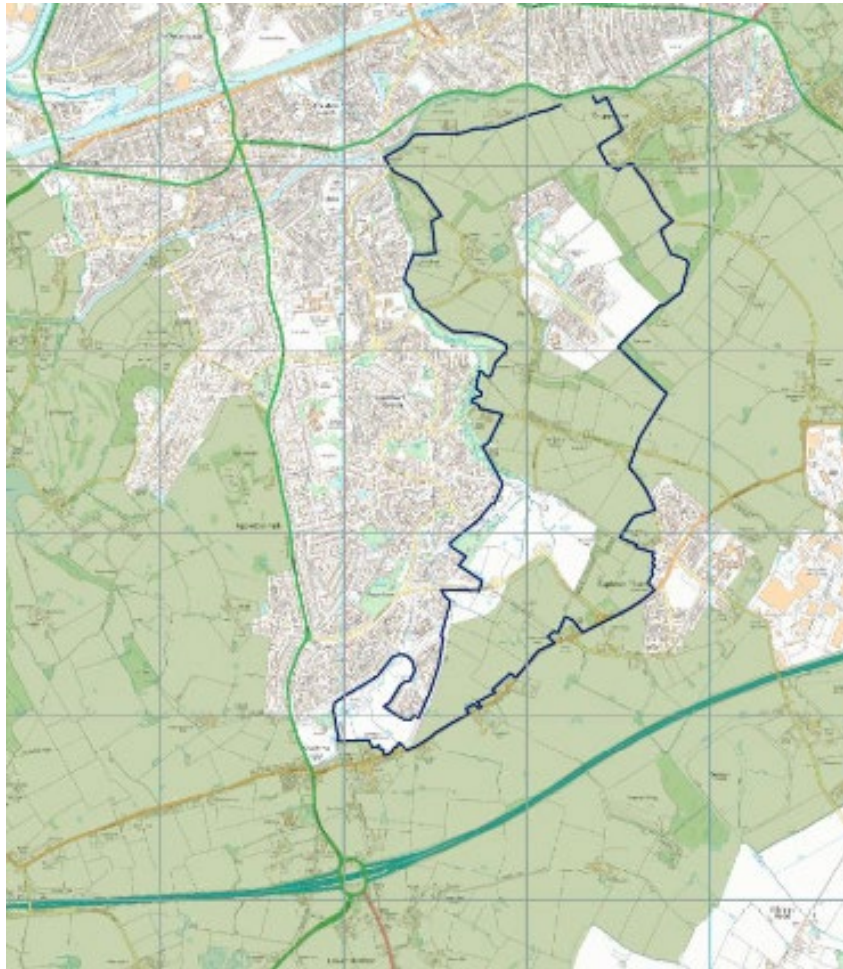


Figure 17 – Housing Option 1 (2021) complies with existing durable boundary

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

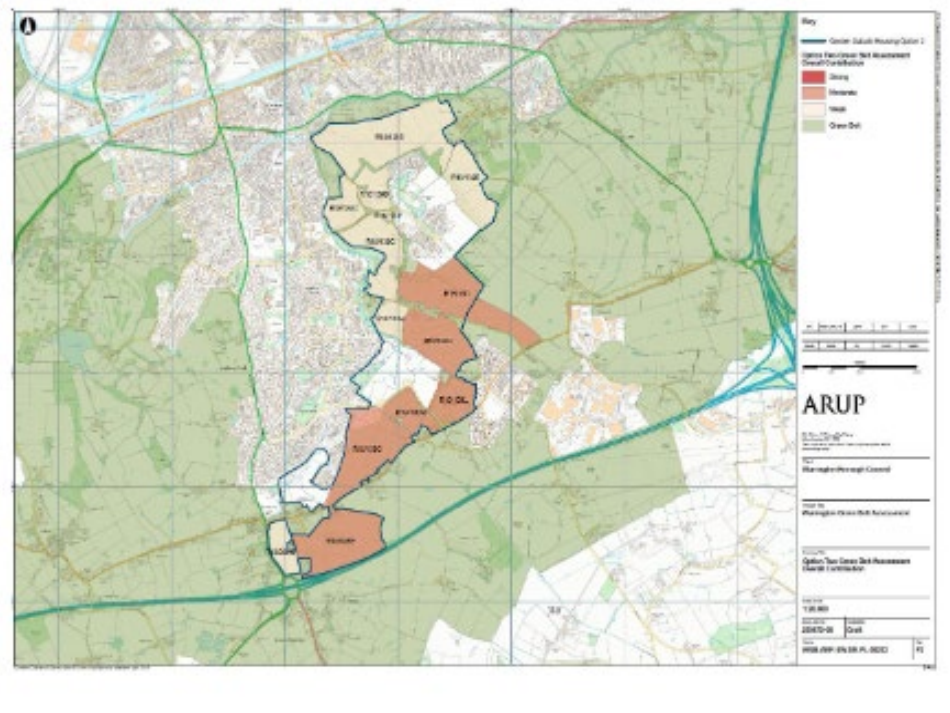


Figure 18 – Housing option 2 (2021) showing Wallace land to the south of the durable boundary.

5. Green Buffer Zone Inconsistency

- 31) 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.
- 32) 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 4, 5 and 6 above. This was acceptable at the time of the 2017 Regulation 18 consultation.
- 33) 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.
- 34) 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.
- 35) 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.

CONCLUSION

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.

It is clearly evident that the inclusion of land area R18/088 West has been the subject of a financial agreement between WBC and Wallace Land Investments for financial gain by both parties. This is deemed unethical and against the principles of the NPPF for exceptional circumstance. It presents a disproportionate and unjustified effect upon the village of Stretton and requires resolution to maintain the green belt.

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.

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

- Response letter No.1 – NPPF and Agricultural land.
- Response letter No.3 – Green belt release for financial gain
- Response letter No.4 – Transport and Accessibility

Yours Faithfully

[Redacted signature]

John E. Appleton

[Redacted address line 1]

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