



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 (UPSVL21)
Response No. 3 – Financial Gain for Green Belt Release

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 section do not comply with the Aims of the Local Plan and supporting evidence. The following reasons, in this particular letter of objection, covers one crucial aspect as described below:

- 1) None compliance with the NPPF (July 2021) in releasing green belt parcel R18/008 West for the unethical and unjustified financial advantage of the private developer, Miller Homes.

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

- a) To overview the original Wallace Land Investments proposal.
- b) To highlight the chronology and stages of inclusion of land site R18/088 within the local plan cycle.
- c) To highlight the financial gain through Reg18 responses by a developer versus the inappropriate land removal from the green belt.

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. It must be noted that the chronology through the three issues of the proposed plan is important to the understanding of the issue.

1. Wallace Land Investments Proposal



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

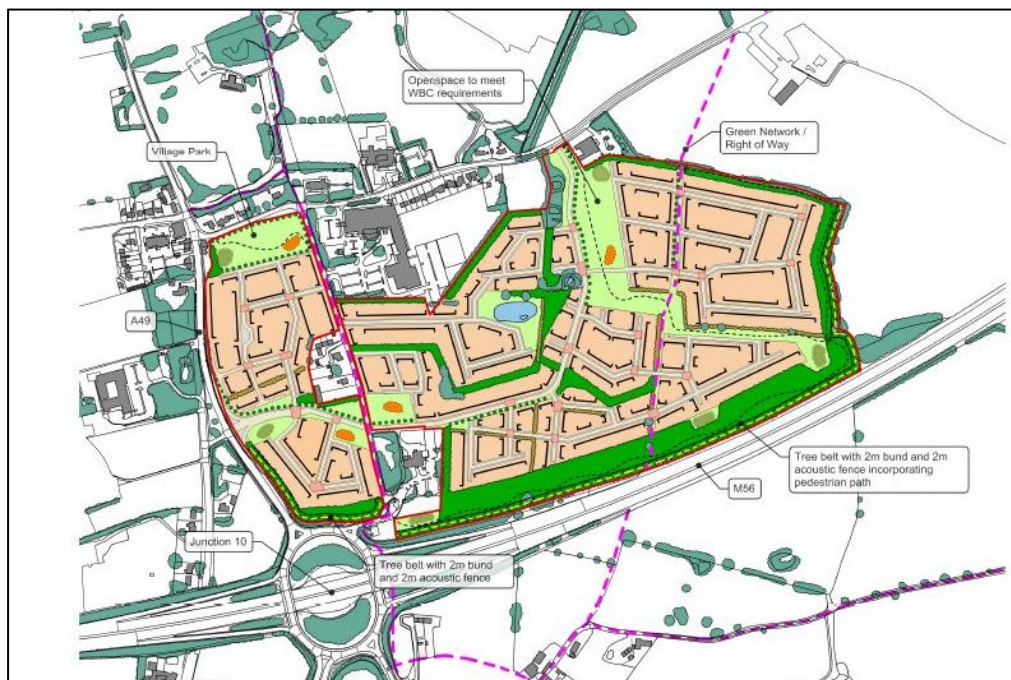


Figure 2 – Wallace Revised Proposal (Feb 2019)

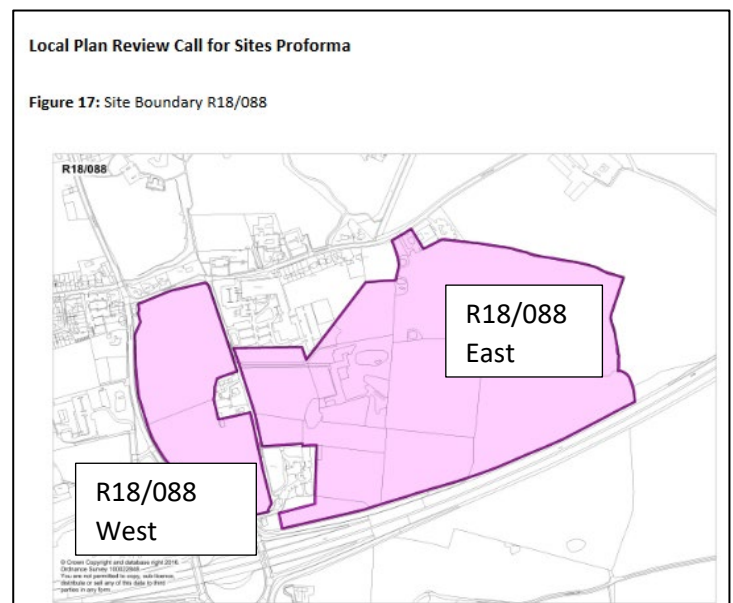
- 3) It can clearly be seen from figures 1 & 2 that the original Wallace Land Investments proposal covered two field areas either side of the roman road, King Street. Currently Spark Hall Close, but formerly the A559 Northwich Road. Spark Hall Close is currently a no through road with a Right of Way footpath at the end of the Close adjacent the Stretton Fox entrance.

2. Inclusion of the Site R018/88 within the local plan cycle

2.1 South Warrington Urban Framework - Issued June 2017

- 4) 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)**

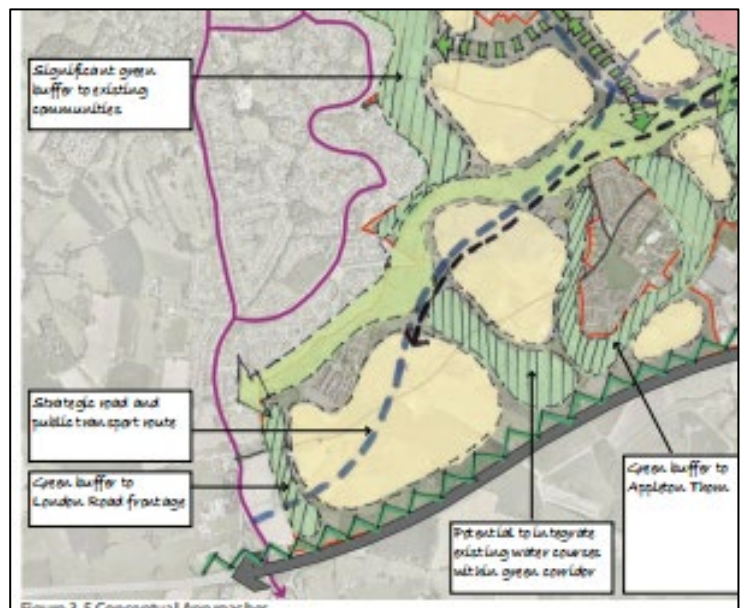


- 5) The 2017 issue of the local plan included a policy which defined the South Warrington Urban Extension (SWUE). The local plan included the 'South Warrington Urban Extension Framework Plan Document – Final June 2017'. That document included conceptual layouts for the Stretton area. It showed, as in figure 4 below the extent of the site location as marked in red. The limit in Stretton being shown drawn down Spark Hall Close (King Street). Notably only the eastern half of R18/088 was included in the layout. R18/088 Western section was excluded from the layout.

Figure 4 Site Location – (2017)

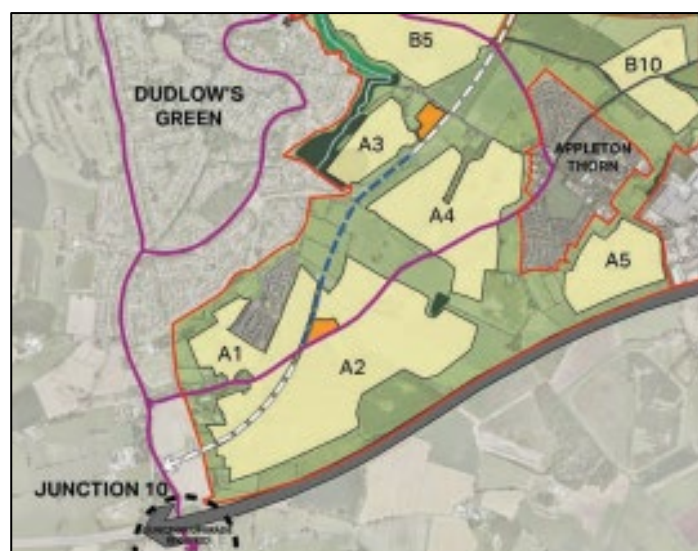


Figure 5 – PDO conceptual approach (2017)



6) 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. However, this conceptual approach also shows the Strategic Infrastructure Road starting off the A49, approximately at Fir Tree Close (Spire entrance) and servicing the residential area and more.

Figure 6 – Framework Plan (2017)
(Land use plan)



- 7) 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 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.

- 8) 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)

- 9) 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)



10) 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 sections 5 & 6 below.

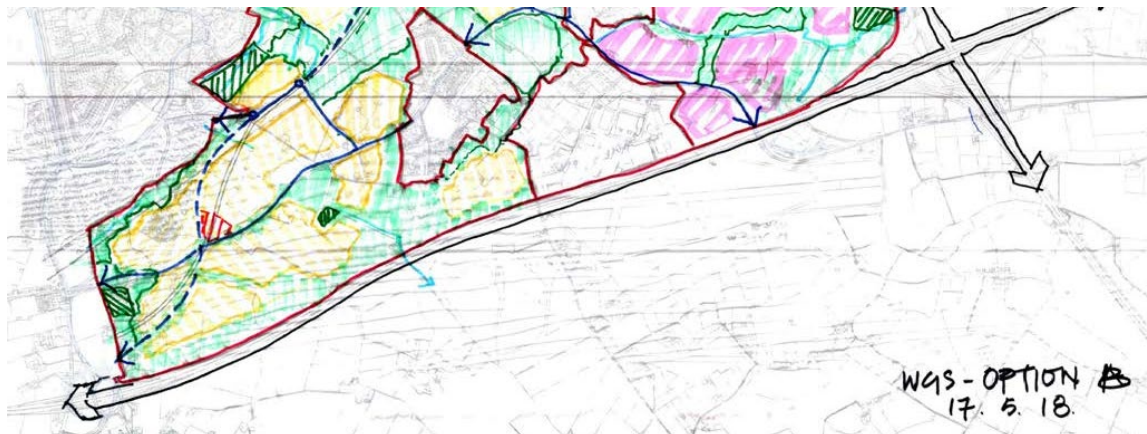
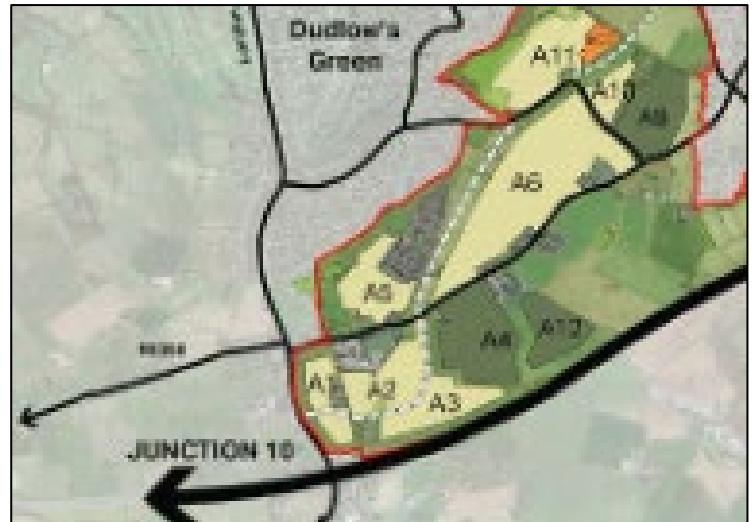


Figure 8 – Preferred Option B (2019)

11) However, the preferred Option B still excluded residential development on the western parcel but still showed the strategic distributor road as in Figure 8 above.

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

Figure 9 – Land Usage – (2019)



13) 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)

14) 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.



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

3. Unethical Financial Gain

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

21) This also was the case as per the South Warrington Urban Framework (June 2017) as seen in Figure 5 above. However, in the March 2019 issue of the Garden Suburb Development Framework (March 2019) the inclusion of residential development on the R18/088 West site now introduced area A1 as targeted for residential use, as in Figure 9 above. Why is this? Well, the answer lies clearly, and as admitted by WBC, in the fact that WBC need developers to pay for the SIR.

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

23) Furthermore, it is deemed 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 Regulation 18 response in 2019, pages 20 – 23 and specifically page 21 clause 4.7 to the PDO regarding the provision of the strategic infrastructure road (SIR) that:

24) *“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”.*

25) In fact, it was not an omission as the original PDO 2017 and the preferred option B in the SVLP 2019 issue did exclude this area of land and it was left as open space to be a green buffer to the proposed Garden Village Suburb.

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

27) Taking into account that the latest SEWUE proposal has reduced the green belt uptake throughout the overall proposal financial gain must not be used as a reason

for release of green belt. It is fundamentally against the principle of the NPPF for exceptional circumstance.

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

29) The alternative connection point for the distributor road to be sourced from J10 M56 has already been communicated to WBC. In fact this alternative has been reviewed by Highways England and communicated to WBC .

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

CONCLUSION

It is clearly evident that the proposal to release green belt land area R18/088 West has been the subject of a purely financial agreement between WBC and Wallace Land Investments for financial gain by both parties. It does not provide exceptional circumstance in accordance with the principles of the NPPF and is deemed unethical. It presents a catastrophic effect upon the village of Stretton and requires resolution to maintain the openness of the green belt and deliver an alternative SIR route from M56 J10.

Yours Faithfully

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John E. Appleton

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