

To:

From:

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## RESPONSE TO THE REVISED WARRINGTON LOCAL PLAN CONSULTATION OCTOBER 2021

I was extremely surprised to hear recently that the Local Plan had been amended and would significantly impact my local area but you had done nothing to inform the local residents of Grappenhall and Thelwall about the implications of this. The meetings at Halliwell Jones stadium had already taken place before a neighbour informed me that the plan had been re-issued. I'm especially surprised at the lack of communication given the local response to the original plan and the direct impact of the removal of Thelwall Heys from the green belt and inclusion for future development. I have therefore listed my objections below; first to the proposed Thelwall Heys development and then to the wider proposed planned development within the Grappenhall, Appleton, Appleton Thorn and Stretton Areas.

### 1. ARGUMENT AGAINST THE PROPOSED THELWALL HEYS DEVELOPMENT

The land at Thelwall Heys is a beautiful, untouched piece of the green belt that provides a clear barrier between the parishes of Grappenhall and Thelwall and marks the end of large-scale development for Warrington. It provides a natural habitat to many species and the thought of developing it is disastrous on so many levels.

#### A. Green Belt

- i. In the 2019 version of the Local Plan the area for development was clearly defined as:

1. *Green Belt Boundary*

- Point 53. *The Green Belt boundary to the south of the Garden Suburb*

*is defined by the M56 and to the east predominantly by the A50 (Knutsford Road).*

2. *Point 54. Development at the eastern and southern extents of the Garden Suburb will be required to respect the Green Belt boundary.*

I do not see any valid justification for this to change. The reduced new housing requirement stated in the new plan together with the addition of the Fiddlers Ferry brown field site, should have meant that no additional development sites would need to be identified?

The land at Thelwall Heys is grade one prime agricultural land. In 1995 MAFF (now DEFRA) surveyed the land at Thelwall Heys and stated that 68% of it was top quality Grade 1 and 2 and 31% of it Grade 3a agricultural land. This compares to 15% of Grades 1 and 2 in Cheshire and 20% across England. I know that makes it easy to develop as no remedial work is required before building can begin. This obviously speeds up progress and will enable you to meet the immediate new housing targets quickly but, at what cost? The fact that the land is virgin green belt land is surely the very reason to protect it. It has never been developed or intensively farmed and so comprises a unique environment that not only offers a green lung to the local community but is home to a myriad of flora and fauna.

- ii. In the Local Plan 2021 under Policy GB1 – Green Belt Point 7, Grappenhall Village and Weaste Lane are listed as Green Belt Settlements and as such are subject to the Green Belt policies set out in national planning policy, such that *new build development may be appropriate where it can be demonstrated that the proposal constitutes limited infill development of an appropriate scale, design and character, unless the infill break contributes to the character of the settlement.*

I would strongly argue that the Thelwall Heys site as it currently sits absolutely contributes to the character of the settlements as it forms a clear boundary between them. Infilling it would be detrimental to the area and would join the villages of Thelwall, Grappenhall and the Weaste Lane settlement together and therefore they would no longer carry their own, independent identities.

Point 10, Development Proposals in the Green belt clearly states, *'In accordance with national planning policy, within the Green Belt, planning permission will not be granted for inappropriate development, except in 'very special circumstances'.*

Thelwall Heys currently clearly sits in the green belt and fulfils a pivotal position defining the three settlements and no 'very special circumstances' exist that would enable it's development. Removing the land from the green belt as is proposed is unjustified and no-good reason is given for doing so, other than to circumvent this clause.

- iii. Under 'Why we have taken this approach' in the revised local plan point 10.5.4 states

*The site performed well in terms of the assessment against the objectives of the Local Plan, the requirements of the Government's National Planning Policy Framework and the Local Plan's Sustainability Appraisal. The Local Plan Green Belt Assessment determined that the site only makes a weak contribution to the objectives of the Green Belt. The removal of the site from the Green Belt will provide new strong and defensible boundaries to the Green Belt.*

Figure 1a below shows the green belt between Grappenhall and Thelwell and the M6. As you can see from the image the site of Thelwall Heys constitutes a strong contribution to the green belt when looked at in conjunction with the surrounding area. It does contain the listed property of Thelwall Heys in the centre, but as a listed property this is obviously party to restrictive development laws and given its sparsity and green planting, it is not intrusive in the area. When you look at the area to the east and south of Thelwall Heys, that will constitute the new boundary, you can see that it has already been extensively developed in pockets and there is no clearly defined green space. Joining up these developments in the future to completely remove the green belt in this location will be extremely hard to argue without the anchor of green belt that Thelwall Heys provides.

Figure 1a



- iv. In Boris Johnson's conservative party speech this year he said,  
*you can also see how much room there is to build the homes that young families need in this country, not on green fields, not just jammed in the south east, but beautiful homes on brownfield sites in places where homes make sense.*

This was backed in the 2021 budget by Rishi Sunak confirming £1.8bn in funding for housing developments on brownfield sites.

The proposal for developing Thelwall Heys goes completely against this pledge and would take away the important 'green fields' the government have committed to retaining.

## B. Wildlife

- i. My garden backs onto Thelwall Heys and I frequently see birds on the RSPB endangered list. These include red and yellow list birds. Frequent visitors to my garden include House Sparrows, Tree Sparrows and Dunnocks, I have regular visits from Song Thrush and Mistle Thrush and occasional visits from the Lesser Spotted Woodpecker, Starlings, Yellow Wagtails, Bullfinches, Black-Headed Gulls and Common Gulls. Alongside these I see an abundance of common garden birds including Nuthatch, Goldfinch, Chaffinch, Greenfinch, Hawfinch, Treecreeper, Jay, Coal Tit, Great Tit, Blue Tit, Long Tailed Tit, Blackbird, Wren, Robin, Greater Spotted Woodpecker, Green Woodpecker, Collared Dove, Woodpigeon, Magpie, Crow, Grey Heron, Pheasant, a Bird of Prey family (likely Buzzards or Kestrels), bats and owls. Without the Thelwall Heys site many of these birds would not be present in the area. Thelwall Heys offers a unique habitat locally with an abundance of old hedges, trees and water sources. Even developing the land and leaving these as isolated features is not going to support the current population of wildlife as they will not have an open area of safe land with an abundance of insect life to support the variety and number of birds currently living there.
- ii. This is backed by the 2004 environmental surveys of Grappenhall Heys which found 32 different bird species present at Thelwall Heys including several which at that point were deemed to be of high importance due to their "red" status. These included Grey Partridge, Skylark, Tree Sparrow, Linnet, Yellowhammer and Reed Bunting. A number of these were found to be of county importance. The 6-week consultation period has not allowed for this assessment to be repeated but there is no indication that Thelwall Heys's contribution as a habitat for endangered birds has changed.  
Ponds at Thelwall Heys were also surveyed at the same time and found rare examples of water life, including beetle species. The environmental report very clearly stated that if the site was developed these habitats would be lost along with their inhabitants.
- iii. As Thelwall Heys has never been intensively farmed the field boundaries and hedges create a rare environment which sustains a diverse range of flora and mammals. I've personally seen stoats, foxes and small mice but I'm sure there are numerous others. Local naturalists in previous years have studied the land and found a great many species present.

In 2004 WBC commissioned a landscape appraisal of Thelwall Heys and they referred to this in their submission to the public inquiry to their Unitary Development Plan. The report identified Thelwall Heys as a landscape type

worthy of special landscape character status due to its small-scale landscape of pasture, hedgerows and mature trees. One important factor was that the area was deemed to be distinctive from other surrounding areas. This has not changed. No further ecological reports that look at the site to determine its importance have been carried out. Destroying it without assessing its value seems like sacrilege.

### C. Road Transport and Traffic

- i. The introductory paragraph in the local plan states.

1. *Policy INF1 – Sustainable Travel and Transport*

*To deliver the Council objectives of improving the safety and efficiency of the transport network, tackling congestion, reducing carbon emissions and improving air quality, promoting sustainable transport options, reducing the need to travel by private car and encouraging healthy lifestyles,*

- ii. Creating a development at Thelwall Heys which introduces a minimum of an additional 300 homes, with multiple vehicles per household, to the local road network is not going to meet this objective. The location is extremely unlikely to support a large volume of local jobs and its situation away from strong intercity train links means that the majority of travel will be by car, flooding the already over congested local roads with a high volume of additional traffic. This will have the exact opposite effect to the one indicated in the plan by increasing congestion, increasing carbon emissions and increasing air pollution. The train network is so far away, across a busy town, with slow moving traffic, that it is not a realistic option for people who don't work in the local vicinity. There are also very few options from the local area by bus that take you outside of Warrington without first having to travel into the centre of town. This adds 45-50\* minutes to journey times on public transport before you head in the direction required. \*Figure taken from LTP4.

This is backed up by figures in the local transport plan 4 that states that 74% of Warrington based people travel to work by car which is significantly above the average of 61% for England and is a clear indication that the local public transport network is already failing commuters.

- iii. Under point 1. General Transport Principles:

*g. Ensure traffic generated by development is appropriate to the type and nature of the routes available and that there is no adverse impact on the local community;*

Clearly there will be an adverse impact on the local community with a substantial increase in the volume of vehicles using the road network. Also, as the development seems likely to be accessed from Knutsford Road/ Cliff Lane, there would be an increased risk of road traffic accidents. This road is already extremely busy and despite the speed limit of 30 miles per hour, traffic regularly travels faster than this. Traffic speed data collected using the Police's traffic monitors has shown that drivers regularly drive at excessive speed. In

April 2021 Cheshire Police monitored the A50 at the Grappenhall junction for a number of days. Data collected showed that of the approximately 6500 road users in a 24-hour period, 92.4% were speeding. Over 3000 vehicles were travelling at between 40 and 50 mph and over 2000 between 50 and 60mph. The highest speed recorded was 80mph. This suggests that access into and out of the proposed Thelwall Heys development for 300+ household a day would pose a significant safety concern. Having slow moving vehicles entering a fast-moving traffic lane will inevitably result in collisions.

- iv. In both the Local Plan amendment and Local Transport Plan 4 there is no specific commitment to enhance the immediate road network or the nearby congestion hot spots, specifically around Junction 20 of the M6, the approach to the Manchester Ship Canal crossing on Knutsford Road at Latchford and the route towards Stockton Heath. Adding additional traffic into this area will only make things worse. All road development shown in the plans is located North of the ship canal or over to the west of Warrington. Nothing supports the increase in housing proposed for this area.

#### D. Local Facilities

- i. I am extremely concerned about the lack of local facilities for doctors, dentist, chemist, nurseries, schools and larger supermarkets with refueling facilities. The increased number of residents in the area will put more pressure on the few facilities already here. Whilst the amended local plan indicates a contribution will be required from the development to go towards the provision of schools and primary care facilities, no details of how much this will be or how it would be used are included. I also have concerns about the ongoing costs of such services as no mention of how the services will be sustained in the long-term is identified. With regards to larger supermarkets and shops, the nearest options at Stockton Heath are already busy and the provision for parking in Stockton Heath itself is fairly minimal. Also given that the carparks here require payment there is already an abundance of on street parking that clogs up the area and causes driving hazards and safety issues. These concerns will only magnified with the increase in local population that the proposed Thelwall Heys development would bring.
- ii. Another area of concern is the flooding implications of building on Thelwall Heys. The site acts as a drainage location for heavy rain falls in and around the area and was identified as such during the 2004 planning enquiry. We already see regular evidence of flooding in the Cliff Lane, Weaste Lane and Thelwell areas. How will this problem not be exacerbated by building on top of the natural drainage area offered by Thelwall Heys?

#### E. Impact on Local Residents

- i. As a resident whose property abuts directly to the proposed development at Thelwall Heys, I obviously have extreme concerns about the detail of the development that is planned. For example, given that the land directly behind

the houses along Knutsford Road is approximately 1.5 meters below the ground level of the development site, what assurances will be offered to protect existing resident's privacy, light levels and noise intrusion.

- ii. Thelwall Heys is bordered along two sides by the Trans Pennine Trail and the Bridgewater canal. These areas are highly valued by the local community as open green spaces for recreation and exercise aiding the local communities' physical and mental health. I'm particularly worried about the section of canal which is one of the last portions that sits in open countryside between Grappenhall and Lymm. Developing the Thelwall Heys site would fundamentally alter the outlook and ambience of these locations, remove access to open spaces from the local residents and irreversibly alter the look and feel of the area.

## **2. ARGUMENT AGAINST THE AMENDED WARRINGTON LOCAL PLAN – APPLETON, APPLETON THORN, STRETTON**

Many of the points raised above in my objection to the Thelwall Heys development apply to the development at the south of Warrington. The enormity of this plan will destroy the nature and character of the area. Approximately 1000 acres out of 1400 acres of green belt are proposed to be built on which includes Grade 2 and 3a arable farmland. Building on this land will take an enormous chunk out of the green belt and extend habitation out to meet the M56. Given the councils propensity to use green belt sites for development, this opens the way for the development of the whole area between the M6, M56 and the A49 in the future, with the prospect of the complete removal of the green belt. This leads me to the following questions.

- i. With the exception of Fiddlers Ferry, why have no other brown field sites been considered in the local plan for development?
- ii. What environmental and ecological assessments have been carried out to assess the impact of developing such a large swathe of land and removing it from the greenbelt?
- iii. What is the justification to build 4200+ houses in the area? This is over and above the hundreds of houses that have already been built or are planned to be built.
- iv. Given that this amount of development will add an extreme volume of traffic to our already congested road network, what plans are in place to mitigate this? The Local Transport Plan 4 makes no mention of road improvements in this region.
- v. How will you mitigate the increase in air pollution, noise pollution and road-traffic accidents this development will create?
- vi. As all public transport hubs are located in and around the town centre, a 45 minute to 1-hour bus journey away from the south of the development area, what additional solutions are planned to make public transport a viable option for people living in the proposed development?

### 3. IN CONCLUSION

I am strongly opposed to the development of Thelwall Heys and the larger development at Appleton, Appleton Thorn and Stretton and ask the council to reconsider their views considering all the points I have raised here. Please see sense and refuse these development requests for the good of Warrington and its inhabitants.

Yours faithfully

Glenn Cundy