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Dear Sirs

**Updated Proposed Submission Local Plan: September 2021  
South East Warrington Urban Expansion**

I am grateful for sight of the Plan and I note the inclusion of the proposed South East Warrington Urban Expansion which includes a proposal for release of 224.57ha of Green Belt and development of an estimated 2,400 new homes within the plan period.

I am an interested party. I moved into [REDACTED] in February 2021, which is located within the area of Green Belt that the proposal affects, and I have a number of concerns and reservations about the South East Warrington Urban Expansion which I would like you to note.

**SUMMARY**

Below, I will address the following:-

- i. The Plan fails to provide adequate explanation in respect of introduction of infrastructure in the area to accommodate the proposed housing developments;
- ii. The current benefit to the environment afforded by the openness of the Green Belt in the area far outweighs the benefits derived from the Plan in its current form. The impact on the environment in this regard is therefore not justified;

- iii. The Plan would materially and irreversibly alter the identity of the area and is not justified;
- iv. The proposal to release Green Belt does not meet the necessary threshold of proof of exceptional circumstances for this to be a permitted inclusion in the Plan;
- v. Compensatory improvements are not specified, yet they remain a fundamental aspect to justify release of Green Belt and to justify the proposed developments generally.

For the above reasons, which will be addressed in further detail below, the Plan cannot be construed as sound and should not be permitted in its current form.

### **The Infrastructure is not Sufficient**

The Plan already indicates that one of the most significant problems for Warrington is the dependency on car travel. Yet the plan fails to adequately address how car travel will be mitigated when introducing such a quantity of new homes in an area that does not feature any practical mode of public transport.

The primary route into Warrington is through the town of Stockton Heath which already suffers congestion and introduction of further traffic will represent an unacceptable degree of disruption to the village.

I must also add that introduction of further housing in Appleton without the further highway would substantially increase the risk of injury for cyclists, pedestrians and other vulnerable road users. This is particularly so as many of the roads do not benefit from a footpath or pavement, however, I would respectfully add that the absence of any footpath or pavement is one key feature of the area which contributes to the identity and quality of the area, which is essentially preserved as countryside and with country roads.

Conversely however, if further highway were to be introduced, it would most likely serve to increase the traffic in the area rather than reduce congestion or ease access. Introduction of such further traffic is concerning as the area currently represents a green lung for Warrington separating the town centre from the congestion and air/noise pollution caused by the M56/M6. Introducing such further traffic to the area would remove the benefit that is currently experienced because of this. This is particularly concerning in light of the Plan already indicating that one of the biggest contributors to air pollution in the area is traffic.

The area features the M6 to the west and A49/London Road to the east. The M6 does not present a practical route into Warrington town centre from the area and the A49/London Road is barely sufficient to accommodate the current traffic, let alone the additional traffic that will be introduced should this plan be allowed.

The introduction of a further, substantial highway, in a bid to serve the area would also inevitably give rise to a rat-run for traffic linking the M56 and M6. I am particularly concerned by the terms in the Plan that required improvements will include *"a proportionate contribution to improvements to increase capacity at Junctions 10 of the M56 and Junction 20 of the M6"*.

Respectfully, any more substantial highway that provides access between the M56 and the M6 at this particular junction would give rise to a significant further problem; the current M56/M6

interchange is congested on a daily basis and there would inevitably be, each day, a substantial amount of traffic seeking to bypass the said junction and utilise any alternative access road. This would give rise to an unreasonable amount of noise and air pollution and would cause unnecessary congestion and disruption to residents.

It is understood that a Local Plan must have regard to objectives concerned with preventing major accidents and limiting the consequences of such accidents for health and the environment. Introduction of highway at this point would not be of benefit to the residents, but will afford commutes passing through the area an alternative route/bypass to a busy junction and this will, inevitably, result in inconsiderate driving and high-risk sections of road. The Plan does not offer any explanation or understanding around these issues.

I am also of the view that affording an additional route would not ease congestion at the M56/M6 interchange. It would actually serve to increase the traffic that utilise the route. It is known that there is a symbiotic balance between the available highway and the traffic that consequently make use of the same on motorway routes, in summary, the volume of traffic at this particular junction will not be alleviated by introducing such highway, it would just inevitably result in daily congestion and substantial increase in air and noise pollution in the area.

**The adverse impact on the environment far outweighs the benefit and is drastically contrary to public policy**

It is also incredibly disappointing to see such willingness, ease and desire to release Greenbelt at a time when there is such coverage and such drive to reduce carbon emissions and protect the planet.

Greenbelt clearly serves a fundamental purpose for the environment and introducing a proposal to replace such a valuable part of our borough with industry, road and (assuming) infrastructure and imposing such an obvious detriment to the green space and the wildlife is something that is, frankly, embarrassing for those that proposed this Plan and devastating to the current residents of Warrington. We are repeatedly advised that there is no single opportunity to reverse the damage being done to the planet, but that each interested party should introduce small steps, where they can, to assist with a greater cumulative impact. This is one such example in my view. By making a greater effort to protect the Greenbelt the Plan will be demonstrating engagement in protecting the planet, setting the correct example and leading as they have been elected to do so.

Even a proposal that simply delays consideration to remove Green Belt would be construed as more reasonable. This would again afford opportunity to drive development of Brownfield sites which, generally, offer a much reduced contribution to the quality of the environment than that of Green Belt.

As briefly addressed above, there is a substantial amount of noise and air pollution that emanates from the M56 and M6, and this index area serves to create a barrier between those motorways and the Town centre. Removing the area from Green Belt, will also remove this natural barrier that affords protection to Warrington from the said air and noise pollution. In addition to this, there is such a substantial array of wildlife and natural habitat that represents a significant benefit to all residents of Warrington and other visitors to the area, and a feature that really contributes to the quality of life for Warrington's residents and visitors..

### **There would be a material and irreversible change to the identity of the area**

The proposal would entirely alter the identity of Appleton. The unique hamlets of Appleton Thorn, Wrights Green, Dudlows Green and Grappenhall would be amalgamated under the proposals. There would inevitably be no distinguishable features to separate out the individual hamlets and would remove the very appeal of the same for the residents and any prospective purchasers.

It is absolutely devastating to see the Plan reflecting that, within the Plan period, the idyllic suburbs housed in Greenbelt with such an array of wildlife, character and greenspace would be transformed into new-build housing. There would thereafter be no identity to continue to preserve and applications for any further urban sprawl or development would likely be approved seeing a drastic and irreversible increase in development in the area.

### **The release of Green Belt is not justified in the Plan**

My immediate concern is that I relied upon the findings and proposals in the adopted plan from 2015 before I purchased a property in the area. I understand from the Plan that it is the need for affordable homes that represents the index challenge, and note specifically that that former adopted plan provided that there was a requirement for *“over 400 additional new affordable homes to be provided in the borough each year”* and indicated a plan that could meet the same without impacting upon Green Belt, in fact the plan made several assurances as to the preservation of Green Belt and identified the value of the same for the borough. In similar terms, this new plan provides *“the most recent Local Housing Needs Assessment suggests that approximately 433 additional new affordable homes need to be provided in the Borough each year”* and yet despite there being no clear material change in number of new homes required, the new proposed plan concludes that a significant area of Green Belt must be released.

I would ask that before proceeding with the proposed Plan, a fuller investigation needs to be undertaken to determine why the earlier Plan failed so as to avoid the same being repeated, particularly in light of some of the irreversible proposals that feature in this new Plan.

The former Plan was intended to provide assurances for development until 2027. Within 6 years of this Plan being adopted, there is a major shift in the proposed pattern of development by the council and a major change in the Plan, and I am concerned that if this former adopted Plan from 2015 could now be construed as so drastically flawed at such an early stage after its implementation, then what assurance can we have that this new proposed Plan will be satisfactory for the Plan period. The proposals that the Plan is seeking to implement are not going to be easily reversed and I am of the view that the failure of the previous Plan and the uncertainty that this gives to the new proposed Plan would, in itself, show that the relevant threshold of proof of *“exceptional circumstances”* necessary for the release of the Green Belt have not been met.

My suggestion would be to shorten the Plan period and temporarily remove the proposal for the release of Green Belt, thereby driving the development of Brownfield sites first and taking the time to make a more comprehensive assessment of whether release of Green Belt is the only remaining viable option to meet the necessary targets.

I cannot see that the Plan explicitly acknowledges that the use of Brownfield sites must be exhausted before utilising Green Belt. The absence of this would, in isolation, illustrate that the Plan is not sound. It may well be more appropriate for the start point to have been that the South East Warrington Urban Extension section of the Plan and any other proposal affecting Green Belt should be included as no more than a provisional proposal to take effect only upon Brownfield having been exhausted.

I must, in any event, address why in my view the Plan fails to properly address the necessary threshold and justification for release of Greenbelt.

I understand that policies relating to Greenbelt are set out in the National Planning Policy Framework (hereafter "NPPF"). Paragraphs 137 and 138 of NPPF provides:-

*"...The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

*Green Belt serves five purposes:*

- A) to check the unrestricted sprawl of large built-up areas;*
- B) to prevent neighboring towns merging into one another;*
- C) to assist in safeguarding the countryside from encroachment;*
- D) to preserve the setting and special character of historic towns; and*
- E) to assist urban regeneration, by encouraging the recycling of derelict and other urban land.*

The Plan would be entirely contrary to the above 5 policies. Proposal to remove the area from Green Belt appears to be nothing more than a loophole to circumvent the 5 fundamental aims and the Plan appears to substantially understate the threshold of proof that is necessary to meet "exceptional circumstances".

NPPF paragraph 140 applies, which provides:-

*"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighborhood plans*

I note specifically that the boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The plan addresses this in incredibly brief paragraphs at 3.4.7 to 3.4.10. I note the following:-

*The starting point for Warrington's Exceptional Circumstances is the requirement to ensure that sufficient land is provided to meet Warrington's development needs. The Plan's proposed housing requirement will ensure that issues of affordability are addressed and that sufficient homes are provided to support the planned level.*

Respectfully, this is not an appropriate rationale. There are currently substantial undeveloped Brownfield sites, and Brownfield sites that are available for regeneration. Releasing Greenbelt will serve only to draw developers away from those Brownfield sites initially, until such time that the Brownfield sites have been developed and have sound proposals for development, it cannot

be accurate to submit that release of Greenbelt is necessary. The result will inevitably be that development on the (then former) Greenbelt will precede any development on Brownfield due to the ease in which they can be developed and the inflated price in which the sites and developments can be sold on for at a later date, making the same vastly more appealing for developers.

In essence, the Plan will result in developers cherry-picking the former Green Belt and inevitably development on Brownfield sites will not be as proactively progressed. Should the Plan, in its current form be permitted, in 5 or 10 years, Warrington will very likely be in a position where former Green Belt has been developed, and available Brownfield remains undeveloped. The Plan is not sound and cannot be allowed to proceed until some mechanism is installed to ensure that development on Brownfield takes priority.

The absence of the same, very much, illustrates that the Plan is not sound.

Furthermore, I understand that the proposal is for 2,400 homes within the plan period, 30% of which will represent 'affordable homes' and this equates to 42 affordable homes per year on the Greenbelt. I would propose that the underutilised Brownfield sites could afford well in excess of 42 new affordable homes per year and afford the Council opportunity to reach their housing target without affecting the current Green Belt boundary.

Additionally, I would respectfully propose that allowing such a Plan to proceed would entirely undermine the Greenbelt and the Greenbelt boundary. Less than 6 years previous, a Plan deemed the area suitable for Greenbelt status and it is difficult to see what has changed in respect of this. The very nature of Greenbelt, as detailed above by NPPF is to prevent urban sprawl and to ensure some 'permanence' to the same. The title of this specific section of the plan, being "...*Urban Extension*" is, essentially, the same by definition as '*urban sprawl*' and is entirely contrary to the purpose of Green Belt.

In summary on this point, it is correct to state that the Plan proposes to remove Green Belt to allow urban sprawl.

Furthermore, there was recent debate in the House of Commons on 19 October 2021 which provided further context to the use of and release of Greenbelt and reiterated the position that "*homes should not be built on green fields if we can possibly help it. Instead we should focus on boosting construction on brownfield sites*". As part of the debate, the following commentary was introduced:-

*"Councils must meet two clear tests to make any changes. The first test outlined in the national planning policy framework ensures that local authorities are prevented from changing a green-belt boundary other than in exceptional circumstances. They must show that every other reasonable option has been exhausted, and that includes using brownfield land, optimising the density of development and discussing whether neighbouring authorities can take some of the development. In addition, local authorities must consult local people before submitting a revised plan for examination by an inspector. If a local authority finds that it really cannot avoid removing land from the green belt, it is expected to offset the loss of that land through environmental and access improvements to the remaining green belt."*

The Plan is not clear that every other reasonable option has been exhausted. The plan is much more indicative of it simply presenting as an 'easy' option to reach the housing target, rather than this being the only option available.

In summary, in order to show that the necessary threshold of *'exceptional circumstances'* has been met the Plan would have to include adequate explanation as to how the developments on Brownfield site are exhausted, or will be exhausted, before Green Belt can be released.

Additionally, the Plan does not appear to account for Brownfield and regeneration opportunity that may present within the Plan period, particularly in light of the massive increase in home working that was driven by Covid19 and the foreseeability of office closures which will result in easy opportunities to renovate into flats and other affordable housing within the Plan period. Until this is addressed further, the Plan cannot be construed as sound.

Absence of necessary infrastructure to Brownfield sites is not sufficient reasoning to justify release of Green Belt. NPPF is clear on this point that the only mechanism that would trigger the necessary threshold is if the use of Brownfield sites had been exhausted.

### **Compensatory proposals are not adequately addressed in the Plan**

There is reference to compensatory improvements, but no indications as to what these would be, specifically. Respectfully, there is a requirement to include this in the Plan to justify the removal of Greenbelt, but it does not do so and therefore cannot be construed as sound.

Should the Plan have proposed improved access to new, enhanced or existing recreational and field play provision, I would comment that the current recreational facilities are ample for the present community and 'improved' access would only be necessary if there were an increase in housing. This would fall outside the definition of compensatory and would fall within the ambit of necessary infrastructure;

Should there have been a proposal for new/enhanced green infrastructure, I would again repeat that this would fall more within a definition of necessary infrastructure, rather than compensatory;

In terms of woodland planting, there Plan should be including indication as to where this will take place. Generic proposal is not sufficient. Unless this falls within the immediate vicinity of the affected area, this would not be construed as compensatory. The same applies to biodiversity, habitat connectivity and natural capital, unless there is a clear proposal as to what compensatory improvements will be introduced, the release of Green belt should not be permitted. This is fundamentally because once the Green belt status is removed, the developers will no longer have any tie to provide such compensatory improvements and will seek to develop the land in the manner that primarily suits their benefits and needs.

### **My Personal Circumstances**

I moved to [REDACTED] in February 2021 with my wife and my 1 year old son. It represented a significant investment for us and the Greenbelt status was a significant influence on our decision to purchase the property in this area. I relied on the fundamental characteristics of Greenbelt, including their permanence in finding some reassurance that we may be afforded opportunity to enjoy the area for the foreseeable future.

We currently benefit from views of fields outside of most of our windows. On a daily basis we see herons, buzzards, pheasants, bluejays and bats. This will, most certainly, be entirely eliminated should the Plan be permitted to go ahead. We also benefit from having a very short walk to a nearby stream, which is already suffering some degree of disruption from the developments taking place in Appleton and will most likely deteriorate rapidly should further developments start to take place.

I am greatly concerned that our emotional investment in the area will be quashed entirely should the Plan be allowed to proceed, but I am also equally concerned that the value of our property will substantially reduce. Should the plan be permitted, our property will lose the attributes that made it most appealing for us as a family and the characteristics that make it worth the sum that we paid, specifically, the outlook onto surrounding fields, the limited light pollution, the surrounding wildlife, the limited noise pollution and the unique concentrated community.

I hope that the above comments are of some assistance. I would be grateful if you would kindly keep me informed of the progress of discussions and proposals regarding this Plan.

Yours faithfully

Alex McBride