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

Dear Sir / Madam,

**Re: REPRESENTATIONS TO WARRINGTON UPDATED SUBMISSION LOCAL PLAN 2021- 2038**

We are residents of [REDACTED] and are writing to make representations to the Warrington Updated Submission Draft Local Plan 2021-2028.

Having read through the draft plan we appreciate the need for more housing in the Warrington area, however we strongly oppose the updated South East Warrington Urban Extension plan (policy MD2) due to the significant impact to our local area and community.

Site Policy and Context

Wrights Green is a hamlet which currently sits within the Green Belt as defined by the Adopted Local Plan Core Strategy 2014. The proposed draft plan removes it from the Green Belt and redefines the boundaries of the Green Belt.

The National Planning Policy Framework (NPPF) is clear that local planning authorities should meet objectively assessed needs unless adverse impacts in doing so would significantly and demonstrably outweigh the benefits (paragraph 11).

We believe that the effect of policy MD2 on Wrights Green and the local community has not been fully assessed and its impact would significantly and demonstrably outweigh any benefits.

## Objection to policy MD2

Below are our main objections to policy MD2 of the Draft Local Plan.

1) Paragraph 137 in the NPPF clearly states:

*“The Government attaches great importance to Green Belts. 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.”*

By removing Wrights Green from the Green Belt in this Draft Local Plan, urban sprawl will not be prevented, and the land will not be kept permanently open, which is in opposition to the fundamental aim of Green Belt policy.

2) Paragraph 138 in the NPPF states:

*“Green Belt serves five purposes:*

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring 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;*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

We believe that the proposed draft plan is in conflict with four of the five purposes of the Green Belt as stated in the NPPF for the following reasons.

Re: *“ a) to check the unrestricted sprawl of large built-up areas;*  
*b) to prevent neighbouring towns merging into one another;”*

The change in boundaries of the green belt from the Adopted Local Plan 2014 to the updated Draft Local Plan means that the previously separate areas of Appleton, Grappenhall, Appleton Thorn and

Stretton will no longer be separate. Removing all of this land from the Green Belt will merge these local areas which have different characteristics into one large built-up area. This therefore supports our point that Wrights Green should continue to be considered part of the Green Belt.

Re: *“c) to assist in safeguarding the countryside from encroachment;”*

The immediate area around Wrights Green is countryside which is well used open space vitally important for the health and wellbeing of the local residents; by removing it from the Green Belt, the council is failing to safeguard the countryside from encroachment.

Re: *“d) to preserve the setting and special character of historic towns;”*

Historic assets in the local area as listed in the Adopted Local Plan 2014 in Appendix 4 are as follows;

- Wrights Green House, Lumb Brook Road – grade II listed
- Wrights Green Cottage, Lumb Brook Road – grade II listed
- Lumb Brook Bridge, Lumb Brook Road - Boundary lines with Appleton, Stockton Heath II & Grappenhall - grade II listed
- Lumb Brook Bridge (an aqueduct), Lumb Brook Road - Boundary lines with Appleton, Stockton Heath II & Grappenhall – grade II listed

Surrounding these historic buildings with newly built estates would clearly impact the preservation of the setting and special character of the local area, and therefore we believe that Wrights Green/Lumb Brook Road should remain incorporated into the green belt.

3) Regarding Green Belt boundaries, the NPPF states:

*“139. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should: a) demonstrate why normal planning and development management policies would not be adequate; b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; c) show what the consequences of the proposal would be for sustainable development; d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and e) show how the Green Belt would meet the other objectives of the Framework.*

*140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.”*

The new Draft Local Plan does not set out any major changes in circumstances which has made the change in Green Belt boundaries of removing Wrights Green and the surrounding area from the Green Belt necessary when compared to the Green Belt allocation of the Adopted Local Plan 2014; and therefore is in conflict with point (b) mentioned above from the NPPF.

The NPPF also states:

*“143. When defining Green Belt boundaries, plans should:*

*a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*

*b) not include land which it is unnecessary to keep permanently open;*

*c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*

*d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*

*e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*

*f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

The new proposed boundaries of the Green Belt in the Draft Local Plan 2021 are not clearly defined and do not use physical features that are readily recognisable and likely to be permanent. Section MD2.3 of the Draft Local Plan 2021 states:

*“24. The Green Belt boundary is defined by Stretton Road and the M56 to the south and Broad Lane, the southern edge of Grappenhall Heys and then broadly following Lumb Brook Road and Green Lane to the east. Where this boundary consists of field boundaries, these will need to be strengthened to create a new recognisable and permanent Green Belt boundary.”*

The boundary being described as “broadly following Lumb Brook Road and Green Lane” is obviously not a clearly defined boundary, and using field boundaries is also not a physical feature that is readily recognisable or likely to be permanent given that the fields are proposed to be developed on. This is in clear opposition to section 143 of the NPPF above and therefore the Green Belt has been inappropriately defined in this Draft Local Plan 2021.

## Suggested Modifications

Our main concern is the extent of the area of countryside that has been removed from the Green Belt in the area surrounding Wrights Green when compared to the Adopted Local Plan 2014. We believe this will make a huge impact on the quality of life of the residents of Wrights Green and the local area, removing green space which is necessary for a healthy lifestyle.

Page 136 of the Adopted Local Plan 2014 states the council's vision for the countryside and its constituent settlements in 2027:

*"There is a secure, long-term Green Belt and the countryside is sustainable and attractive with a thriving rural economy and communities. Farm diversification is supported by a positive approach to development management. Improved access, amenities and visitor attractions are encouraging more people to enjoy the countryside but not at the expense of its character, tranquillity and biodiversity."*

We hope the council still retains this vision and we therefore suggest reverting to the Green Belt boundaries proposed in the Adopted Local Plan 2014; this seems to offer a clear boundary with adequate open green space between the separate areas of Appleton, Grappenhall, Appleton Thorn, Wrights Green and Stretton to keep the areas distinct, avoid sprawl and to maintain the special significance and setting of these historic areas, whilst allowing for enough development space for the housing shortage.

If this was not possible then the minimum we would expect is to maintain the Green Belt in the area of Wrights Green and its immediate surroundings; specifically between Wrights Green and Dood's Brook/Dingle Brook, between Wrights Green and Grappenhall Heys and The Gorse, and between Wrights Green and Green Lane to Appleton Thorn.

We look forward to your response.

Kind regards,

Dr Amelia Webber and Mr Amit Samuel

