

# Proposed Submission Version Local Plan

## PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

**Name of person completing the form:** Cliff & Elaine Renshaw

**Email address:** [REDACTED]

2. What type of respondent are you? Please select one option only.  
If you are an agent please select the type of client you are representing.

A local resident who lives in Warrington

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	-
<b>Agent name (if applicable)</b>	-
<b>Address 1</b>	[REDACTED]
<b>Address 2</b>	[REDACTED]
<b>Postal Town</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone number</b>	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

MD2 South East Warrington Urban Extension

2. What does your comment relate to? Please select one option.

Both of the above

**If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).**

Please refer to attached letter

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
<b>Legally Compliant</b>		
<b>Sound</b>		
<b>Compliant with the Duty to Co-operate</b>	X	

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

To stress the importance of the objection to the parts in the letter of representation

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Letter of representation re the Warrington proposed Local Plan.pdf - [REDACTED]

**Comments/file description**

Letter of representation

You have just completed a Representation Form for MD2 South East Warrington Urban Extension.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**



Cliff & Elaine Renshaw

Planning Policy dept  
Warrington Borough Council  
East Annexe Town Hall  
Sankey Street  
Warrington  
WA1 1HU

Sent by email to

13<sup>th</sup> November 2021

**To whom it may concern.**

**Response to the Updated Proposed Submission Version Local Plan 2021**

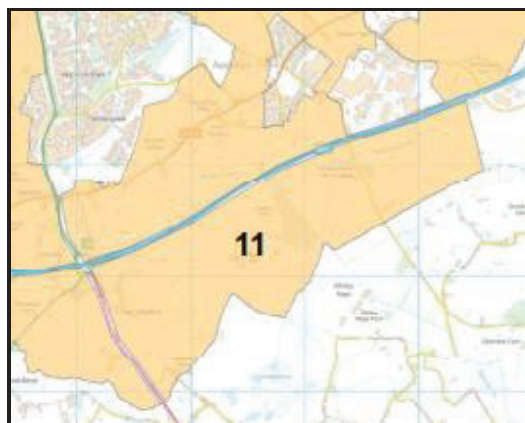
I am responding to the above and wish to register a strong objection to the following points which relate to specific parts of policy MD2 and MD6 in the South East Warrington Urban Expansion plan (SEWUE).

**1. The objection relates to 2 specific points**

- 1.1. The removal of land from the Green Belt, in particular area marked R18/088 which is part of area 11 in the Arup General Assessment (GA) table.
- 1.2. The route of the proposed infrastructure link road from the A49 to Stretton Road.

**2. REMOVAL OF LAND FROM THE GREEN BELT**

- 2.1. The proposed changes to the Green Belt boundaries were first identified in the Arup, report dated 2016 appointed by Warrington BC and the purpose of the report was to undertake a complete analysis of the Green Belt boundaries and make recommendations for new boundaries to be considered in the proposed 2019 Local Plan.
- 2.2. This objection relates to Area 11 in the Arup report as shown in fig 1 below and is the starting point for the review of “durable boundaries” which affects the future more detailed analysis of each parcel within each GA.



**Fig 1**

## Arup General Assessment area 11

- 2.3. The report concludes that the durable boundary should be the M56, but this appears to be inconsistent not only with previous Green Belt reviews but also with other durable areas in the report and the NPPF & Planning Guidance Service (PAS) guidelines.
- 2.4. For example, Fig 2 below of the “Figure 8. Choropleth” shows a major part of land south of M56 as “weak and the land to the south of the M56 as only moderate but this contrasts with Fig 3 below “Figure 9 of the Choropleth” which shows the land to the north of Stretton Rd being a moderate contribution but the land to the south of Stretton Rd apart from the Stretton settlement is not classified at all.



Fig 2

“Figure 8 Choropleth” mapping showing results of General Area Assessment



Fig 3

“Figure 9. Choropleth” mapping showing results of Parcel Assessments

3. The guidance in the NPPF and the PAS states that *“The positive role of Green Belt is that it can and has prevented ‘ribbon’ or ‘strip’ development, maintained settlements as distinct and separate, and retained the openness of the landscape on the fringe of significant urban areas. However, the Green Belt has also had a negative role in preventing the potentially arbitrary natural growth of settlements.*

- 3.1. For the past two decades, and even longer the Green Belt durable boundary for this area has been Stretton Rd as shown in Fig 4 below.

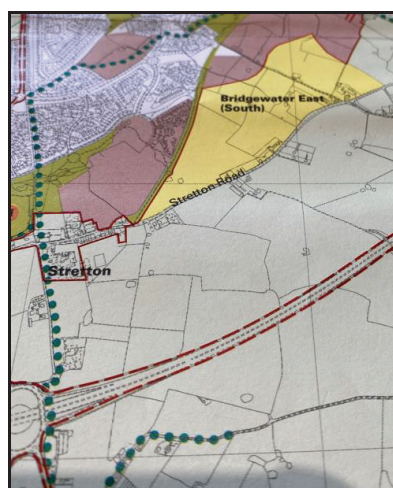


Fig4

Warrington UDP 2001

- 3.2. The Arup report is very detailed however, as the authors readily admit, many of the decisions are based on “subjective judgements” and in this respect the judgements regarding the classification of area 11 is open to question.
- 3.3. For example:- the GA assessment table sets out the 6 criteria for inclusion in the Green Belt and assesses parcel shown as R18/088 in the subsequent report identifies R18/088 West as weak and R18/088 as Moderate but more detailed assessment of Purpose 2 and 4 radically changes that judgement.

#### **Purpose 2**

- 3.4. Unrestricted sprawl
- 3.5. The current plan for the “Warrington Urban area” extends south as far as Stretton Rd and area 11 includes a considerable residential development currently under construction.
- 3.6. The remaining part of area 11, south of Stretton Rd, is current within the Green Belt and forms a durable boundary to that Urban area but surprisingly the Arup report concludes that area 11 would not make any contribute to prevent unrestrained Urban Sprawl into the Green Belt. This is quite an astonishing judgement since most of area 11 agricultural land.
- 3.7. It is suggested this assessment is incorrect since the land to the south of Stretton Rd and across the M56 is “grade 2 & 3 agricultural land” and makes at least a moderate contribution, if not a strong contribution, to unrestricted sprawl into the Green Belt.

#### **Purpose 4**

- 3.8. To preserve the setting and special character of historic Towns.
- 3.9. Stretton village is a historic village dated back to 1133, a quintessential inset Cheshire village with its own historic Church, Roman road post office and primary school etc.
- 3.10. One of the criteria is the viewpoint to the local parish church. If the land in parcels R18/088 East & West are excluded from the Green Belt and used for 700 dwellings they will completely obliterate views across the open fields to St Mathews church.
- 3.11. In summary the six criteria in the Arup report are more properly Moderate, Strong, Strong, Moderate, Moderate and Strong, in other words 3 strong 3 moderate which makes the overall assessment of R18/088 Strong and not Moderate.
- 3.12. Removing area R18/088 from the Green Belt and allowing it to be subsumed into the South Warrington urban area would be quite contrary to the PAS guidance to “*maintain settlements as distinct and separate, and retained the openness of the landscape on the fringe of significant urban areas*”.

#### **Individual parcel R18/088**

4. The report prepared by Aecom in 2017 and the basis for the 2019 Submitted UDP showed the parcel of land R18/088 split into East and West of Spark Hall Close
  - 4.1. Aecom used the Arup report to classify R18/088 West as weak and R18/088 East as moderate. But for the reason explained above a more accurate classification would be that R18/088 West as strong and R18/088 East as strong or at the very least Moderate.
  - 4.2. The 2019 draft UDP excluded R18/088 from the Garden City boundary and the proposed Green Belt changes see fig 5 below



**Fig 5**

**Land to the west of Spark Hall Close excluded from the Garden City Suburb**

- 4.3. However, acting for the landowners Wallace Land Investments contended that the whole of R18/088 was a weak contribution to the Green Belt and that R18/088 West shoulder excluded from the green belt and included in the Garden City Suburb boundary and as part of their report agreed that in return for all their site being granted residential status, they would in turn pay for the M56 J10 to Stretton Rd link Road
- 4.4. Warrington subsequently acquiesced to that demand and in the latest 2021 UDP have removed R18/088 from the Green Belt and as demanded by Wallace, included it in the revised residential boundary.
- 4.5. It is understandable that the developer would strongly support not only the removal of the land from the Green Belt and in return offer to pay for the road when the value of their land would jump from £10M to £100M but this would be quite *unethical planning policy* that planning consent would be granted to a developer to build new houses in the Green Belt in return for paying for an important infrastructure road which is required as part of a master transport plan LPT4.

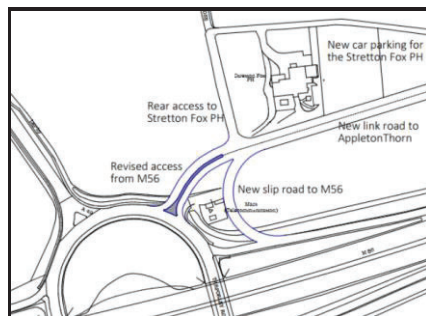
**5. THE PROPOSED LINK ROAD from A49 TO STRETTON ROAD**

- 5.1. It is agreed by all parties that the current Cat & Lion junction of the A49 and Stretton Rd B5356 is a problem, and this exists prior to any proposed changes in the proposed UDP.
- 5.2. To solve the problem a new link road routing traffic away from the Cat & Lion junction onto to Stretton Rd, Highways England undertook a review and made recommendations traffic based on 2 assumptions.
  - 5.2.1. The creation of a Garden City Suburb which included 9,000 new houses plus a new commercial village centre with retail and community facilities.
  - 5.2.2. The route for the proposed link road through the current Green Belt assumes that in exchange for granting planning consent for circa 700 dwellings the developer over whose land the route passes would pay for the link road and would not involve any CPO to acquire land for any alternative route.
- 5.3. In relation to point 5.2.1 the proposed Garden City has now been abandoned and the traffic generated by that proposed development will be significantly reduced.
- 5.4. In relation to point 5.2.2 the land required would be in the ownership of the existing Millers option landowners, Highways England and Vintage Inns, owners of the Stretton Fox and it is therefore unlikely any COP would be required and certainly not a reason to agree to a sub-optimal highway solution.
- 5.5. One of the principal causes of traffic at the Cat & Lion is vehicles coming along Stretton Rd and queuing at the lights to turn left onto the A49 and go to the M56 J10, but the interim route proposed in the proposed LDP to build the first section from the A49 to Spark Hall



Close and improve that road and the junction to Stretton Rd opposite the Church will cause more problems than it solves and is totally without merit or technical justification.

- 5.6. In addition in terms of timing the first section would be built in 2026 but the second section of the road would be scheduled for 2038 some 12 years later and knowing how housebuilders chose to build on the lush Green Belt and then land bank sites there no guarantee if would ever be built and it should also be noted that the Local Centre planned for the Bridgewater East, north & south developments on the Homes England sites at Appleton Thorn are already part built with no sign of when, if ever, would the Local Centre be built to support the extensive housing estates.
- 5.7. It's the same old story the Housebuilder builds his houses makes his profit, but the Local Authority fails to use the monies to provide the communal facilities.
- 5.8. In the light of point above and in recognition that the route should not be influenced by the commercial interest of local land owners or Housebuilders it is expected that Highways England and the Warrington Transport Team would now update its review and consider if the most appropriate route would start on the M56 J10 as outlined below in Fig 6



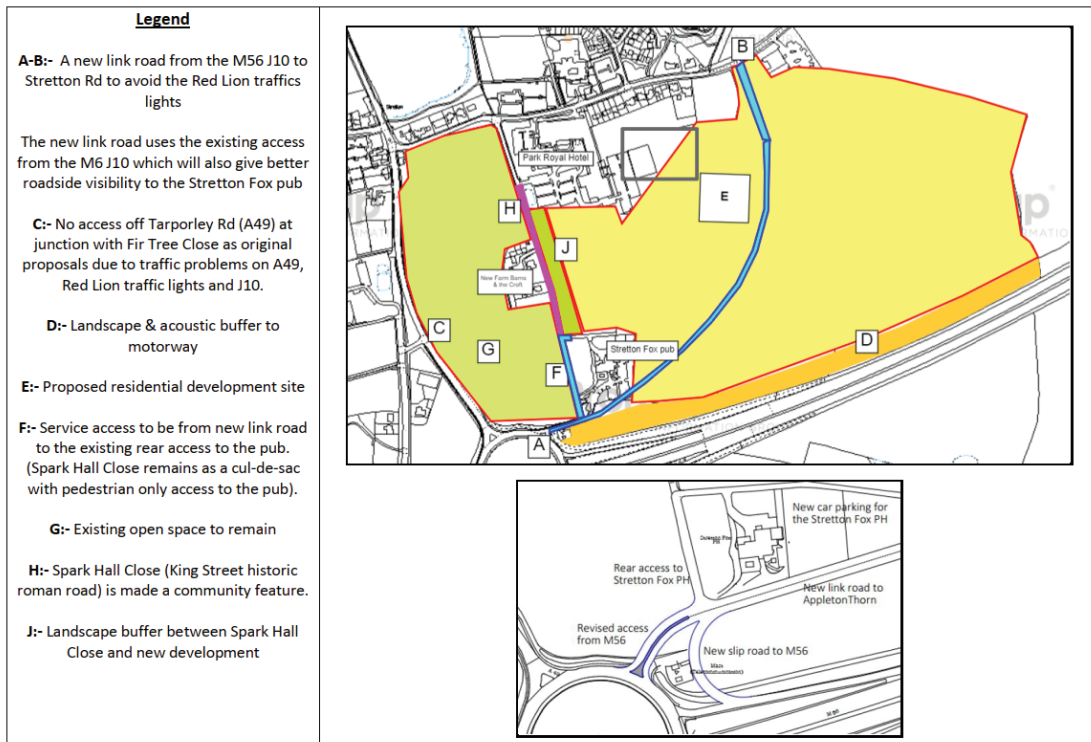
**Fig 6**

**Proposed route of the link road to start at M56 J10**

## 6. Summary

- 6.1. The removal of land within the Green Belt for residential development should be a last resort and, as the Prime Minister recently reported in Parliament, only when, other non-Green Belt sites have been developed. In this instance, bearing in mind the low rate of new housing within non-Green Belt and other brownfield sites removing site R18/088 at this juncture is unjustified.
- 6.2. Furthermore, removing land from the Green Belt to allow a developer to be granted planning consent and obtain a windfall profit from the uplift in land value does not fall within the definition of “exceptional circumstances” as required by the in the NPPF and any such change would likely lead to a judicial review of any such decision.
- 6.3. In the proposed LDP it is planned to allow building on Grade 2 & 3 agricultural land (i.e., R18/088 East and West) in advance of other brownfield and urban sites purely to allow a developer to pay for the costs of a link new road is inappropriate and again likely to lead to judicial review.
- 6.4. In terms of developer funding for any infrastructure such as the A49-Stretton link road this should be paid from the previous and future release of huge amounts of land by Homes England at Appleton Thorn which will produce more than sufficient profit some which should to be channelled into paying for this part of the link road.
- 6.5. In addition, in the light of the of the removal of the Garden City Suburb concept the expenditure of the road improvements to the A49 should be reviewed to ascertain if those schemes are now actually necessary.

6.6. In the event that R18/088 is still to be removed from the Green Belt, as a compromise it is suggested that it only applies to R18/088 East and that R18//088 West remains within the Green Belt and that the proposed development masterplan below Fig 7 should be adopted.



**Fig 7**  
**Alternative masterplan for parcels R18/088 East and R18/088 West**

Yours faithfully

[Redacted signature block]

Cliff Renshaw *FRICS*

Email:- [Redacted]

Mobile:- [Redacted]