

## **Warrington Local Plan comments from the Warrington Nature Conservation Forum**

### **Introduction**

I am writing on behalf of the Warrington Nature Conservation Forum, as Chair, to express the views and opinions of our members concerning aspects of the Warrington Local Plan.

With the number of units required increasing to 24,000 this has an even greater widespread impact across the Borough on the natural environment especially places like Moore Nature Reserve and the habitat that has taken centuries to evolve. We are not convinced that some of the policies like QE5 & QE6 are strong enough to protect the Borough's Wildlife sites or creation of new ones.

We would have liked to have seen the addition of overlays to the local plan.

These overlays would highlight the location and extent of wildlife sites (which would map the Biodiversity list of appendix 3), the Mersey Forest plan (for Warrington page 82), the Mersey Environment Gateway Trust area of interest (Upper Mersey Estuary) and the Environmental Agency's flood map for planning. These examples would give people a spatial awareness and an indication of the impact, issues and proximity of the proposed developments within the Local Plan and Westernlink network.

In another there is a list of partners. The plan however gives no indication of the work that they are doing which could be incorporated into the Warrington Borough Council, Vision and Long-term plan. The plan should have vision that makes people want to live, visit and invest their future here whilst at the same time protect and enhance the biodiversity of the place. If we get it right for the wildlife then it will hopefully be right for the humans as argued by Hugh Warwick in his book LINESCAPE. We don't want a vision of a concrete jungle purely driven by the Government unit target we would like to see greater input and local control.

We expect that this may well appear in the more detailed plans that will be developed in the spring of 2018 along with the transport networks and housing developments but please not at the expense of the wildlife networks of green corridors, carbon landscape connectivity, green canopy, water network etc.

Examples can be seen on such approaches by the work of the EA and their flood defence work, the Mersey Gateway Environmental Trust monitoring the new Bridge Build and the many projects large (Saltmarsh) and small (Orchids) as well as Mersey Forest plantations to name but a few.

Our membership consists of hundreds of Warrington residents with a keen interest in Wildlife, several of whom are local ecologists and our partners such as Cheshire Wildlife, rECORd, RIMAG, Mersey Gateway Environmental Trust, Liverpool Museum. Between them they have entered thousands of sightings into the rECORd database that is used as evidence to verify the biodiversity status of wildlife sites and scrutinise planning applications across the Borough of Warrington.

Austerity measures have unfortunately seen the demise of the WBC environmental office and the transfer of some of the services that they used to provide to the Manchester Ecology Unit based in Tameside. Some of our partners have had their funding from WBC reduced or withdrawn and we ourselves have lost our presence from the WBC web site after a couple of decades. It used to be an active portal with links to wildlife groups and archive of WNCF newsletters until it was removed in 2016 shortly after being updated! All these actions were confirmed as being due to cost cutting in a reply to our environmental question posed at Full Council twelve months ago.

Fortunately, some funding has been given to one partner although less than the amount they used to receive. The WNCF has found a host associated with RIMAG. They have stepped in and created a much-improved web site from the original, a new meeting place has been found, a monthly column in the Warrington Guardian established and a very strong Facebook site of with over 500 members.

None of the 3<sup>rd</sup> sector wildlife groups and individuals want wildlife sites to be reduced or threatened in any way we are asking for a clearer statement of how the places especially LWS sites they support are to be protected, enhanced, created and if appropriate linked especially between like species and environments. We believe that by doing so the final Local Plan will be improved and more sustainable for wildlife and enhance our surroundings.

### **Importance of Wildlife Sites and protection from developers**

Warrington has 3 European Sites of International Importance (Special Areas of Conservation), 4 Sites of Special Scientific Interest (SSSI), 3 Regionally Important Geological Sites (RIGs), 4 Local Nature Reserves (LNR), 55 Local Wildlife Sites (LWS) and 3 Wildlife Corridors as depicted in appendix 3 (Biodiversity Designations) there is therefore a great deal to protect as described in their respective and collective citations.

Despite sites are being listed in appendix 3 there is no map showing their location or better still their locations overlaid over the main Local Plan map. We would envisage this being better described by the adoption of an interactive layers. We believe that it would also be very useful to do the same for the Mersey Forest Plan for Warrington and the area of interest for the Mersey Gateway Environmental Trust. Both organisations have been in existence of between 25 and 7 years respectively and their current visions and latest plans have been around for a good time, work that has involved a great deal of analysis and design and grown in significance. As they are partners we feel that their plans are of significance to the local plan and should be incorporated.

Whilst we realise that the local plan is an overview, we would like an indication of how Local Wildlife Sites (LWS) will be protected. We remember the loss of one at Rixton a few years ago when a new enterprise application was approved after appeal to the Inspector. The applicants fought hard when appealing to the Inspector to overrule WBC planner's decision to turn down the application. Their development was haphazard and piece meal with little or no enforcement monitoring or challenge taking place by WBC until the development was to all intense and purpose complete.

The applicant's solicitor took apart the WBC case and even undermined the Cheshire Wildlife Trusts status of a LWS that was believed to be secure. The episode illustrated how a wildlife's protection could be undermined if you have enough financial & legal clout,

knowledge and experience and that was when we had a very competent ecologist selling their soul.

We ask that WBC's policies, especially QE5 and QE6 be strengthened to protect the wildlife habitat and that policies are actively enforced with the policies being spelt out clearly to potential applicants who will sign up to them and that these will be enforced vigorously by WBC. Habitats such as these take centuries to mature and be recognised they very important assets in Warrington's natural history.

Over recent years examples of rogue developers who hope to make their land more easily developed by destroying its habitat before they apply for permission to build have been on the increase. Examples exist where important green canopies have been felled, however where these have been caught because members of the public have contacted WBC – preservation orders have been served, but not often enough. It was good to see the mitigation of tree planting by the EA/WBC in Victoria Park as part of Phase one of their Flood Defence work.

A good example of a development was at a former naval base Croft site in Croft for more than 20 properties. The site was infested with invasive plants, namely Himalayan Balsam and Japanese Knotweed close by was a pond. The site plan and application highlighted these features and how the developer was going to treat the evasive plants whilst protecting and enhancing the pond to increase biodiversity as well as creating a walk and viewing areas. We hope that future developments take note of this good practice. We would like to see this as a recommendation for applicants requesting that they enhance the areas that they propose to develop instead of getting an ecologist on board as something they feel compelled to do or as an afterthought. We would like to see a Warrington Guide to good environmental practice issued to all applicants.

We do not want further wildlife sites status challenged, undermined and destroyed as they were at Rixton, where they totally ignored for several by the enforcement and planning team. We do not want to see such technical escape clauses being activated by default under stealth. We do not want to see any other Wildlife site face extinction. We would like these and other wildlife sites to receive the highest level of protection that they deserve especially if when as seems highly likely we leave the EU because of Brexit.

The significance and status of these places have been achieved by our members and partners collecting huge amounts of data over decades of hard work. There are numerous prominent eminent environmentalists like David Bellamy (Risley Moss), Woolston Eyes (Chris Packham) who have put their name and support behind the Borough's Sites of Special Scientific Interest as well as BBC documentaries that have all highlight the important wildlife sites of Warrington.

One example was when David Lindo (Urban Jungle North West) visited Warrington because he was made aware of numerous groups with wildlife stories to tell. His visit in the summer of 2013 was facilitated by members of the WNCF who showed him the Swift colonies (highlighted by the Swift renown & local expert Brian Martin), hedgehog hospital, etc. Even Jeremy Paxman travelling down the River Mersey through Warrington, not to mention the growing number of seals lending their environmental support. Both highlighted the importance of Woolston Eyes.

The WNCF has been involved in many surveys to designation many sites in compiling the evidence that acknowledges their importance as Wildlife sites. We argue strongly that they must be protected against bulldozer and tons of brick and concrete, covering the landscape beyond all recognition. Once destroyed by large developments or damaged through encroachment these habitats cannot be recreated and will be lost for ever.

We mustn't forget that there are other areas for example where wild orchids grow that need protecting during the summer months and we are appreciative of the work and partnership that we have with WBC as we develop that protection and policies just as we did to protect birds during the breeding season that are now followed and enforced. We would like to see the growth of other places in and around the Town where for example invertebrates

We believe that biggest threat to Wildlife sites is by lack of management that could result in de-designation. We believe that the local plan should also be forward thinking in accordance with NERC Duty with reference to **rECORd** (the Local Biological Records Centre serving Cheshire, Halton, Warrington and Wirral) and a view to exploring the potential for new sites for designation. It would be ideal if developments located near or next to LWS sites have some element to support such maintenance of wildlife sites built into the approval process as occurred in the Croft development.

Developers must be educated in the way that they can support and reduce to a minimum any impact they may cause. There is a need for plans to be scrutinised by a competent ecologist, looking for how plans can be ecologically enhanced.

It must be beholden on WBC to offer the appropriate advice, expertise and knowledge to help the developers achieve a high standard of care for the environment as part of the planning process. Following approval then the development of the site must be monitored on a regular basis to make sure that appropriate and timely action is taken to rectify any deviation from the agreed plans. On a larger scale, we expect the same to be done with larger construction projects, networks etc as they have been with the Merseylink bridge by Halton.

### **LINESCAPES – connectivity and networking**

We feel that the local plan should say something about identifying new sites and joining up sites to create a eco network, maybe recognizing existing networks of paths as ecosystems worth saving.

Members of the Warrington Nature Conservation Forum believe that the Local Plan must identify the measures to mitigate, protect and even create new wildlife places. The Local Plan should be an opportunity to make sure that their boundaries are protected and that wherever possible they are connected as described by Hugh Warwick in his research and his book "**LINESCAPES – Remapping and Reconnecting Britain's Fragmented Wildlife**", along with green corridors and green canopies.

One of the largest and significant LWSs under threat is Moore Nature Reserve (originally 2 LWS but more recently combined into one). It is an incorporated as part of the Local Plan's Waterfront encroached by the Peel Port's development of the Port of Warrington.

This comes as a great shock to our members when they viewed the plans and they cannot believe the potential damage and loss to one of Warrington's premier wildlife sites and what are the provisions to protect from flooding?

Peel Ports is offering up a huge chunk of their land for the development of the Port of Warrington. This is part of the Waterfront Development that will accommodate in total 4,000 units (houses and industry).

This has been a hugely successful wildlife site development of the extended Nature Reserve that has become a home to bitterns (rated amber), heronry and so much more. 'Friends of Moore Nature Reserve' has many active members and it has been well supported by thousands of people from near and afar. Anyone who saw the early developments of 20 years ago and returns now will marvel at the changes, they just get better and better. However now that the funding from WREN due to closure of Arpley Tip is taking place there is an issue of future funding following the capping of the site. The transition to a regional park needs to have wildlife conservation and biodiversity to the forefront as well as a carefully thought out plan for the appropriate management features in what the MGET is already looking at being a Mountain on which hides can be sited to view the birds and tidal surges on the Upper Mersey Estuary across to Fiddlers Ferry.

Hides provide great leisure places for bird watchers and people travel long distances to see the type of wildlife that has been attracted to this place. Having said this at the opposite end of the spectrum are the vandals who have recently set ablaze a hide not only here but at Risley Moss. For this place to be built on or around (the map isn't too clear) is certainly a retrograde step in our view and we wonder what consideration has been given to managing the flood plain. It is one of Warrington's great successes that needs to be promoted not threatened by layers of concrete.

We imagine that many people in the Town are unaware of Moor Nature Reserve and to take it away from those who are yet to discover the hides, walks, peace and quiet is a great shame. Warrington needs to learn about how to promote such places and educate and inform people about where they are and their value as an asset.

Wildlife sites should be an opportunity for promoting a positive future outcome. These places should be lauded and their benefits actively publicised. Ideally these principles could be incorporated

The proposed increase of units means that the original plan's impact must be revisited because the surface area under construction has increased across a wider area. The impact on local wildlife sites is therefore even more of an issue than it was.

Given that these areas are spread out there should be a greater emphasis on connectivity as the smaller isolated areas run a great danger of collapsing inwardly.

**Moore Nature Reserve (MNR)** consists of two original LWS's that have been merged into one circa 2012. A huge amount of data records has been gathered for Moore and is held on rECORd thanks to some very dedicated people there over the years. It would be worth not just focussing on the LWS designation for the site but how the records stack up, e.g. we suspect the records and species lists for the site compare well to SSSI's and LNR/NNR's. That would be one avenue to really push. We don't want LWS's to get dumbed down and face little or no protection in planning terms. Focus on the sites strengths such as the species and habitats as well as the huge community asset it is for recreation (don't use the words dog walking!!)

With all this new impact, we don't want to be having to search for the green space or be quoting from the Joni Mitchell's song Big Yellow Taxi saying 'they paved paradise and put up a parking lot! Or as one ecologist has been heard to say, "we don't mean cycle ways with strategically planted token trees!" What we need are proper creation of habitat links and enhancements to existing ones.". This should be designated on the outline plans up front as well as the bridges ready for the later detailed plans in spring 2018. We need development that is sustainable for the natural environment.

### **Mersey Forest Plan**

The Mersey Forest continues to develop a growing network of woodlands and green spaces across Cheshire and Merseyside, it has been creating 'woodlands on your doorstep' for 25 years. This organisation has won numerous awards for its planning and has a comprehensive plan for future development as well as organising international and regional conferences.

At recent conferences in Birmingham and Liverpool attention has turned to the thought provoking concept of the Northern Forest or a green Northern Powerhouse Canopy stretching from Delamere Forest, through Warrington, Merseyside, Lancashire, Yorkshire and across to Hull.

Within this is the concept of the development of associated industries to do with wood, e.g. a new Widnes power plant drawing from the management of plantation areas harvested by Eddie Stobbart down to a local level of people harvesting for their wood stoves and in doing so helping manage a sustainable woodland.

Educational resources are another activity at the micro level planting school orchards at Warrington Schools to leaning forestry and carpentry skills. Skills that can be used on local projects along with training at local Colleges such as Reiss Heath locally. Warrington was in danger of throwing this out due to austerity but has had a rethink and is starting to re-invest in the Mersey Forest and support the winning bids.

### **Mersey Gateway Environmental Trust (MEGT)**

The MEGT whilst younger than the Mersey Forest shares many of its values. In the brief seven years that it has been in existence it has grown in significance and has seen successful ecological expertise that are of benefit to the Upper Mersey Estuary plan that extends from Widnes, Fiddler's Ferry and the development and PHD research of the regeneration of the salt marshes along with Long Horn cattle grazing to stimulate the recovery of wildlife to Woolston Weir were monitoring of salmon are taking place.

There is no reference within the local plan to the vision of plans of the MGET which is a key partner that has a planned 30-year interest in the Upper Mersey Estuary and therefore the Regional Park, Waterfront, Moore Nature Reserve and beyond. It is believed that the RSPB have expressed a key interest in being involved within the area.

Whilst the two new bridges/routes aren't the same scale as the Merseylink crossing, they should be taking heed of lessons learnt and any offers of advice and help. A great deal of assistance has been received by the MGET that demonstrate assistance and co-operation can be achieved from such a partnership. It would be good to see WBC successful follow this

model and develop a working relationship with the construction companies and developers to ensure that long lasting ecological benefits are accrued that will benefit the area.

### **Land loss offset**

We understand that for any land lost e.g. greenfield or brownfield then the DEFRA Biodiversity offsetting metric should be applied, is this the case with the local plan? Has there or will there be any S106 funding available that can be used towards environmental projects or mitigation, there is talk that S106 money from Omega was destined to be spent on Gatewarth Phase 2 and on creating grassland somewhere, if so is this still in the pipeline?

### **Green Energy**

Are there any plans for developing Green Energy sites? A few years ago, these were discussed and modelled as part of the Climate Change initiatives being considered by WBC but nothing came from those tentative ideas, for example a small wind farm on the higher reaches of Warrington. Are there any proposals to improve air quality especially near to the many sites close to the large motorway network?