

**Warrington Borough Council Updated PSV2021 (Local Plan)
Examination in Public Matter 6b South East Warrington Urban Extension (SEWUE)**

Statement of Stephanie Fallon on behalf of Rethinking South Warrington's Future

I make this statement on behalf of Rethinking South Warrington's Future further to submissions made in response to Warrington Borough Council's PSV 2021 (Local Plan) and specifically in relation to the proposed South East Warrington urban extension (SEWUE).

1. With regards to the proposed removal of the Green Belt the decision to allocate land for the SEWUE marked as Option 2 in the Sustainability Assessment carried out by AECOM, as well as land allocated for the South East Warrington Employment Area is not consistent with national policies and guidance, in particular the NPPF and the UK Government's Guide to Assessing Development Proposals on Agricultural Land, nor is it consistent with Warrington Borough council's own policies and objectives set out at MD2, and therefore the proposed local plan cannot be considered sound.
2. The NPPF requires that planning and development achieves "an environmental objective – to **protect and enhance our natural**, built and historic environment, including making effective use of land, improving biodiversity, **using natural resources prudently...** and **mitigating and adapting to climate change**".
3. The NPPF requires that the planning system should contribute to the achievement of **sustainable development**.
4. The UK government's Guide to Assessing Development Proposals on Agricultural Land February 2021 requires the following:

Developers and local planning authorities (LPAs) should refer to the following government policies and legislation when considering development proposals that affect agricultural land and soils. The aim is to protect: "the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals." and "all soils by managing them in a sustainable way".

A Green Future: Our 25 Year Plan to Improve the Environment sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:

- protect the best agricultural land
- put a value on soils as part of our natural capital
- manage soils in a sustainable way by 2030

LPAs should use the NPPF to make decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
- prevent soil, air, water, or noise pollution, or land instability from new and existing development.

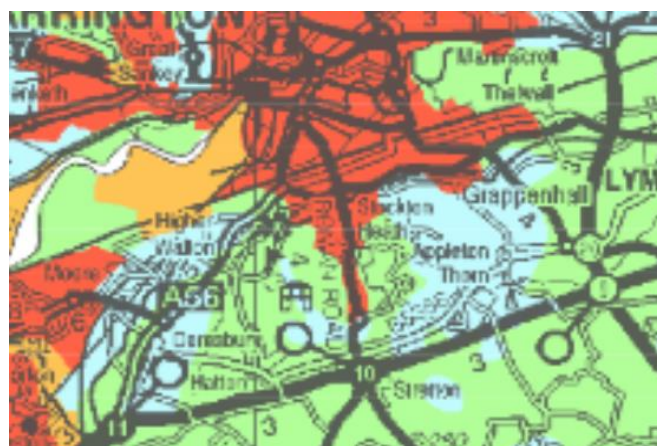
5. The plan for the SEWUE does not meet these requirements for the following reasons:

- a) The proposed allocation sites for the SEWUE, according to the DEFRA Agricultural Land Classification comprises almost entirely of Grade 2 and Grade 3 agricultural land, also designated Best and Most Versatile land. I refer to the image below depicting the classes of agricultural land that would be released from the Green Belt for development should the proposed allocation site be used.
- b) The AECOM Sustainability Assessment at paragraph 9.6: Natural resources: Soil notes that *“the Green Belt land is largely a mix of Grade 3a and 3b agricultural land and to a lesser extent there are pockets of Grade 2 land. In total there is likely to be a loss of over 150 hectares of agricultural land, of which 50% is likely to be Grade 3a. Though a lesser amount of Grade 2 land would be lost it could still be in the region of over 50 hectares. These are negative effects with regards to the loss of soil resources...Overall, the plan is still likely to lead to the loss of a combined total of more than 300 hectares of agricultural land as a result of housing growth. At least 200 hectares of this is likely to be best the most versatile land in so **major negative effects are predicted.**”*
- c) The AECOM Sustainability Assessment at 9.6.14 also refers to WBC’s DEV4: economic growth and development. It says, *“The release of Green Belt land for employment use (South East Warrington employment area) will lead to a loss of agricultural land of at least 100 hectares. The land is classified as broadly Grade 2 and Grade 3 according to the 1988 agricultural land survey. There is approximately 35 hectares of grade 3 that would be affected and so a minor negative effect is expected. The remaining land is classified as grade 3B.”* However, the DFRA agricultural land classification shows the practically the entirety of the allocation site for the SEWUE is classed as "very good", with the employment land allocation for South East Warrington classed as "good to moderate"
- d) AECOM concludes at paragraph 9.6.16 that the development policies are predicted to have *“major negative effects with regards to soil reserves. The loss of greenbelt land could account for a permanent change to 350 hectares of agricultural land, of which 250 hectares would likely be best and most versatile.”* While the point remains the same in terms of a major loss of agricultural land, according to the figures above I would submit that the total loss of agricultural land as a result of the SEWUE and South East Warrington Employment Area is in the region of 400 hectares of land.
- e) *The Sustainability Assessment notes at paragraph 9.6.19 (Green Belt Policy) that “the changes to the Green Belt involve best and most versatile agricultural land. This will be a permanent loss and is therefore a negative impact.”*
- f) *The Sustainability Assessment notes at paragraph 9.6.48 that “Despite a focus on urban growth, the Plan will lead to the loss of a substantial amount of agricultural land...Both Grade 3a and Grade 2 (to a lesser extent) would be affected...This is considered to be a major negative effect, particularly at a time when the need for the UK to be self sufficient in food is becoming more evident.”*

6. From geoc...

**Defra
Agricultural Land
Classification
(ALC)**

Grade	Description
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor



to secure food supply. To ignore the risks of geopolitical and climate catastrophe by removing around 400 hectares of agricultural land, including BMV land would be short sighted at best and dangerous at worst. Ignoring the warnings in the Sustainability Assessment and in the wider research and information sphere to remove this extent of agricultural land is not consistent with national or local policy and is not sustainable development.

7. If every local authority removed similar tracts of agricultural land for development via their local plan or otherwise then we would be at risk of massive shortages of suitable agricultural land. It is not appropriate for us to do it in Warrington and hope it doesn't happen elsewhere, it is for the council to take responsibility for the land over which they have authority and to not expect other councils to shoulder the burden of protecting our food supply and our environment.
8. In the UK Government resource, "Agriculture in the UK Evidence Pack October 2021" it is noted that *"a number of public goods arise from a well managed landscape, including recreational and environmental benefits. Farming and forestry can safeguard natural capital and provide public goods such as the provision of beauty, heritage and engagement. Farmland and woodland can provide thriving plants and wildlife as well as contributing to the provision of cleaner air and water."*
9. While some poor farming practices can negatively contribute to Co2 emissions there is the potential to mitigate and reduce the effects of climate change and improve carbon capture with well managed agricultural land, crop planting and good soil management. The UN Framework Convention on Climate Change acknowledges that land use can contribute significantly to mitigation of climate change, including through the sustainable management of ecosystems.
10. The removal of extensive Green Belt for the SEWUE at the proposed allocation sites will also severely and negatively affect South East Warrington's natural heritage and historic environment. There are conservation areas and several designates heritage assets within this area which will be adversely affected should the current SEWUE plan proceed in its current form. The Sustainability Assessment notes that *"currently the area is characterised by open countryside, which contributes to the setting of various listed buildings. The proposed residential development will change the character of the landscape surrounding these assets, which could have negative implications with regards to the setting. There is also the increased of the issue of increased built up areas being proposed in proximity to existing settlements such as Grappenhall Hayes, Appleton Thorn and Grappenhall. In particular, residential development is proposed adjacent to Grappenhall conservation area and given the boundary extends to the urban fringes, there is likely to be notable changes in the character of the settlement."* This is not consistent with the NPPF, nor is it consistent with WBC's own policies and in particular its MD2.
11. The proposed site of South East Warrington Employment area, in addition to removing significant agricultural land also includes the site of Bradley Hall moated site ancient monument. Of this proposed employment site the Sustainability Assessment notes that *"the concept master plan seeks to mitigate potential effects by providing an area of open space in the immediate vicinity of the hall and moat. However, it is highly likely that the setting of the ass it will be it adversely affected. There is currently a very open countryside setting, which contributes to the significance of the ancient monument. This will be entirely altered by large-scale employment units and so negative effects are predicted."*

12. At the hearing in March 2022 of the Six56 planning application it was asserted by WBC planning department that the result of granting this application would lead to "enhanced access" to this historic monument. What was not admitted was that the enhanced access would be via a site full of HGV vehicles and massive distribution warehouses. It is inconceivable that mitigation measures can be taken to avoid a major negative impact on this historical monument and its surroundings. It is also noted that at paragraph 9.11.22 of the Sustainability Assessment it reads, *"the SEWUE and the nearby employment area...has the potential to give rise to major negative effects, as development will lead to the loss of open space that contributes to the setting of designated heritage assets. Development will also lead to changes to settlement form and character, which can affect historic and cultural value."*

It is for these reasons (among others) I would submit that the Local Plan is not consistent with national policy, including the NPPF and does not amount to sustainable development.

Stephanie Fallon