

**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 Our Green Warrington**

1. The SEWUE plan does not meet the requirements of the NPPF in that the PSV 2021 SEWUE current plan does not amount to an “appropriate strategy” and does not meaningfully take into account “reasonable alternatives”, does not achieve sustainable development and is not consistent with national policy, nor WBC’s own policies, including MD2. The plan also does not provide clear and effective guidance on constraints and suitable mitigation with regards to the green infrastructure network and the natural environment as set out in MD2.3 and therefore cannot be considered sound.
2. There are potential adverse effects not covered within the Local Plan.
3. There are issues with the viability and deliverability anticipated within the SEWUE plan.

**Potential adverse effects not otherwise covered and policies relating to the natural environment and green infrastructure network as set out in MD2.3**

Significant Risk of irreparable harm to extensive areas of Ancient Semi Natural Woodland at the site of the SEWUE

4. The SEWUE plan does not meet the requirements of the NPPF 2021 paragraph 174 (a), (b), (d) and (e) and NPPF 2021 paragraph 180 (c), in that it fails to “*protect and enhance valued landscapes, sites of biodiversity or geological value and soils*”, fails to “*minimise impacts on and provide net gains for biodiversity*”, puts important ecological networks and natural habitats including irreplaceable Ancient Semi Natural Woodland at risk of irreparable harm, fails to prevent “*new development from contributing to or putting at unacceptable risk, or being adversely affected by, unacceptable levels of soil, air, water and noise pollution*” and by view of the chosen location for the SEWUE, fails to “*recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.*”
5. There is no evidence than an impact assessment has been carried out at the sites of Ancient Semi Natural Woodland that lie within the proposed SEWUE. It is noted that Natural England also raised queries about the existence of a WBC policy for ancient woodland in response to the proposed PSV 2019 but this does not appear to have been addressed.
6. The Sustainability Appraisal prepared in conjunction with PSV 2021 notes that the proposed SEWUE will have a negative impact on significant sites of biodiversity and natural green infrastructure in the area.
7. The PSV 2021 SEWUE ignores the Landscape Character Assessment that forms part of the evidence base for the PDO 2017: Natural Environment and Climate Change and the recommendations contained therein.
8. In addition to not being consistent with the NPPF the PSV 2021 SEWUE does not meet the requirements in the following guidance / frameworks:

- UK Government guidance “Ancient woodland, ancient trees and veteran trees: protecting them from development”:
- The Woodland Trust report, ‘Impacts of Nearby Development on the Ecology of Ancient Woodland
- The Forestry Commission guidance, “Ancient woodland, ancient trees and veteran trees: protecting them from development”
- The Woodland Trust guidance, Planners' Manual for Ancient Woodland and Veteran Trees

9. The proposed site of the SEWUE will cover the western part of South East Warrington, which is home to irreplaceable ancient woodland designated ASNW / LWS / SBI, other key woodlands, important Local Wildlife Sites (LWSs), key natural green infrastructure, key blue infrastructure and their surrounding habitats. Full details of these sites are set out in our original submission in response to the Local Plan.
10. The PSV 2021 SEWUE plan puts the ASNW at the Lumb Brook Valley at risk of irreparable harm by proposing development directly adjacent to designated ASNW/LWS The Dingle and Fords Rough. The SEWUE plan also puts key woodland habitats at Grappenhall Heys at risk of irreparable harm by proposing development directly adjacent to designated LWS Parr’s Wood and Beech Wood. **The risk to these sites of biodiversity is particularly high as all of the woodlands listed above have already suffered significant encroachment through previous mass development without a buffer zone along the entire side of each of these habitats. The development proposed by the current SEWUE will mean the woodlands are blocked in on all sides by mass housing and other development, effectively cutting them off from their remaining supporting habitat. This double sided encroachment has already begun with the development of mass housing directly adjacent to the woodland at Dipping Brook, which already has heavy development on one side.**
11. The Woodland Trust’s objection (submitted in response to the original PDO2017 and which is in connection with these specific sites in the SEWUE) reads as follows;

*"The proposed preferred development option would result in development sited directly adjacent to two Woodland Trust-owned sites Lumb Brook Valley and Grappenhall Heys. Due to potential adverse impacts on the aforementioned sites the Woodland Trust objects to this Preferred Development Option. Lumb Brook Valley is designated as Ancient Semi-Natural Woodland (ASNW) on Natural England’s Ancient Woodland Inventory*

*Currently the areas in which development options are being proposed act as a protective buffer and area of undeveloped and natural habitat adjacent to both Lumb Brook Valley and Grappenhall Heys. By replacing this natural area with a residential development there will be a dramatic change in the intensity of the land use. This will expose these sites to a variety of outside influences, also known as ‘edge effects’, which may have impact negatively on both of these sites. The current options proposed will result in both sites being completely surrounded by housing. We believe that the inclusion of Lumb Brook Valley as Strategic Green Space is inappropriate, and that the Council should find other alternatives to fulfil their green space obligations. Furthermore, the conversion of our site Grappenhall Woods into a country park, without consulting the Trust or receiving permission is improper, and the plans should be altered to remove our site from a plan of this nature."*

12. There are no mitigation policies or measures set out in MD2.3 or elsewhere that aim to protect extensive ANSW in the SEWUE. The Sustainability Assessment notes that *“The SEWUE site consists of several villages, which will lead to a substantial loss of open countryside. However, it ought to be possible to avoid existing green infrastructure corridors such as the Dingle and Fords Rough. Without mitigation and enhancement measures, the effects upon the function of green space across this area could be negative.”* Firstly, there would be no mitigation measures that would adequately protect, let alone enhance mass development at or near the remaining open side of the ASNW, secondly, the SEWUE does not “avoid” The Dingle and Fords Rough, it places development directly alongside them.

#### The Mersey Valley Timberland Trail

13. There is no reference in either the PSV 2021 or the SEWUE to the ecological network, The Mersey Valley Timberland Trail, which will be directly and negatively impacted by the SEWUE. The Mersey Valley runs from Runcorn to Lymm, via South Warrington. It is an important network of green habitats and urban spaces, linking a variety of woodlands, including the ancient woodlands mentioned above, waters including The Bridgewater Canal and surrounding wildlife habitats. This vital 22 miles long ecological network should be protected from unnecessary encroachment from development and the consequential pollution and disruption to vital flora and fauna this would bring. It is surprising that not only has The Timberland Trail not been mentioned in the PSV 2021, the SEWUE proposal for development involves mass development across the remaining open part of The Mersey Valley Timberland Trail in South Warrington, rendering the Trail a green pathway through a housing estate, an outdated “New Town” concept. Such proposals will not achieve the objective in the PSV 2021 of protecting and improving the quality of natural green infrastructure, it will negatively impact the green infrastructure of South East Warrington and put at risk the fragile ecosystems it sustains. In other words: any development under the current SEWUE plan is likely to cause harm to this infrastructure.

#### The Bridgewater Canal

14. The PSV 2021 SEWUE puts the biodiversity of The Bridgewater Canal and its surrounding habitat at risk of irreparable harm by proposing housing development, a road, and public buildings / retail between The Bridgewater Canal, Stockton Lane and the woodlands of Parr’s Wood and Beech Wood. This is one of the few open landscapes that adjoins The Bridgewater Canal in Warrington and is already bounded by a road on one side.
15. The PSV 2021 SEWUE puts at risk key ecological habitats that will help to mitigate climate change. There are unlikely to be any or any adequate mitigation measures that would compensate for the harm as a result of development at this specific location.

#### Public Amenity

16. Key natural amenities accessible to those in existing settlements in this area will all be severely and negatively impacted should the SEWUE proceed in its current form.
17. The proposed SEWUE places mass development directly adjacent to practically all of the existing settlements in the area, creating a further layer of mass housing and commercial buildings, blocking these settlements from easy access to open countryside. The proposed mass development directly adjacent to these existing settlements will deprive them of their own sense of openness, and their own “breathable space”.

18. The Sustainability Assessment at paragraph 9.10.5 says, *“This location is within the Green Belt and Appleton Park and Grappenhall (Red Sandstone Escarpment). Development would reduce the openness of a significant amount of land to the south of inner Warrington, in effect agglomerating areas in between Stockton Heath, Dudlow’s Green, Appleton Thorn and Grappenhall. Whilst complete coalescence between settlements would be possible to avoid, there would be noticeable reductions in open space, and a perception of urban sprawl is likely...However, the cumulative effects of such large scale development would be difficult to eradicate completely. Therefore, moderate negative effects are predicted overall.”*
19. For access to natural open green space all of those living in these settlements will have to travel through the new housing developments to far less visually attractive landscape on the far eastern of South East Warrington, which adjoins the A50 with two motorways in the distance.
20. The Sustainability Assessment at 9.3 Climate Change says at paragraph 9.3.3 *“...On the flip side, the concentration of development in urban areas may lead to an increase in urban heating, making communities potentially less resilient to the effects of higher temperature.”*

#### **Viability and Deliverability of the SEWUE as anticipated**

21. In the main submission in response to PSV2021 we set out why we believe Homes England and their partners, among whom are Miller Homes are not appropriate parties to have responsibility for mass development adjacent to and impacting so many important ecological habitats. Imaging and explanations as to why this is the case are within Our Green Warrington’s full response to the PSV2021. Homes England and / or their previous iterations have not demonstrated an understanding of or commitment to protecting and enhancing the habitats that will be impacted by the SEWUE, for example, in their 2016, ‘Call for Sites’ document, they say, ***“Some of these semi-natural woodlands would serve to function as advanced landscaping and entrance features for future development plots”*** and *“there is no evidence to indicate any special habitat or species value which would set it apart from other agricultural/countryside within the wider Warrington area”*.
22. The fact that the proposed SEWUE in “A Deliverable Proposition” a document commissioned and presented by Homes England and Miller Homes and which forms part of WBC’s evidence base for the PSV2021 and SEWUE locates mass development directly adjacent to these ancient woodlands and key sites of biodiversity would indicate that little has been learned in the current iteration as Homes England.
23. Another example is the current David Wilson Homes/Barratt development at Dipping Brook, which we understand is on Homes England land and is still being developed. It completely encroaches on the remaining open side of the woodland at Dipping Brook, as is shown by satellite imaging in our original submission in response to the Local Plan.
24. Nor have Homes England demonstrated a competency for facilitating housing development design that is in keeping with the aims of the NPPF 2021 or the PSV 2021. The Landscape Character Assessment is particularly critical of the design and nature of housing development that has taken place under the stewardship of Homes England and / or its predecessors, saying: *“At present there are three distinct groups of new housing centred on Grappenhall Heys. None display any local vernacular and the variety of different housing developers has resulted in an amorphous and disparate character with little relevance to the area...The new*

*housing has little visual relationship with the local vernacular, and its layout is often unsympathetic to the landscape."*

25. However, having considered the responses to the Local Plan and in particular the responses to the SEWUE by Homes England and Miller Homes we also have concerns that the plan for the SEWUE, "A Deliverable Proposition" calls into question the deliverability and viability of the plan upon which WBC relies and wish to raise this as a concern with the Inspector.
26. The MD2.3 makes specific requirements / plans for the following in the SEWUE:

Two primary schools  
One secondary school  
Provision for later life care  
A health centre  
A recycling centre  
Provision for custom / self build plots

However, in the response to the PSV2021 SEWUE submitted by Homes England and Miller Homes they say the following

- a) Whilst it is fully accepted and supported that the development of the SEWUE will need to provide a range of housing tenures, types and sizes including affordable homes, **there is no current evidence to suggest that typologies such as custom and self-build plots or supported extra care housing are required on this specific site or in the locality.**
- b) There is a lack of any up-to-date evidence to justify this very specific requirement relating to primary schools. Whilst the principal landowners do not dispute that a development of the planned scale is likely to require new school facilities, the precise number of primary schools at any given size is inextricably linked to the timing and location of development within the allocated area and the extent to which there is any available capacity in nearby schools at that point in time. To this end, **the policy should not specify the number of primary schools required or their intake.** Rather, it need only refer to the need for the SEWUE to accommodate on-site primary school provision commensurate with the impact of the new development based on up-to-date evidence of need and demand.
- c) As with primary school requirement, the secondary school requirement is too specific and **should instead refer to the need for the SEWUE to provide secondary school** provision either on or **off site**, commensurate with the impact of development based on up-to-date evidence of need and demand.
- d) With regards the second sentence (dealing with the location of new primary schools), whilst the principle of the approach is agreed, this is a matter that will ultimately be determined as part of the Development Framework for the site. **As such, if it is considered by WBC that it is right that the policy includes a reference to the siting of new schools (the view of the principal landowners is that this is unnecessary),** the principal landowners propose that the wording of the policy is revised to identify that such matters will be considered and agreed during preparation of the Development Framework.
- e) **Subject to the precise requirements for the new leisure facility being** identified and its provision **suitably evidenced and justified...**principal landowners welcome WBC's support for this being co-located with any planned **secondary school facility (also to be justified)**
- f) There is no up to date evidence to justify a requirement for a community recycling centre being met on land within the SEWUE. Reference to its need should be deleted if no evidence for requirement.

27. There are other issues relating to biodiversity, highways and active travel within their objections.

28. Having considered the responses to the Local Plan from Homes England and Miller Homes, what is concerning is that in the document, 'A Deliverable Proposition' that forms part of the evidence base upon which WBC relies for the SEWUE plan, it specifically refers to the following;

*"Supporting infrastructure will include:*

- *Lumb Brook Green - **new primary school** and small convenience retail offering of circa. 500sqm.*

- *Grappenhall Heys - up to 1,000sqm of commercial/non- residential space and **potential for extra care or later life housing.***

- *Appleton Cross - providing the primary centre close to the proposed allocation of health provision at Appleton Cross with a mixed use plot with supermarket or larger retail units offering up*

*to 2,500sqm. A further mixed use plot can provide an additional 500sqm of retail / non-residential space in smaller format. **The proposed Secondary School, and Community Hub, including leisure facilities (approximately 3ha), are also in this location.***

- *Stretton Road - new primary school."*

29. Presumably these were key factors in WBC working with these parties ahead of the PSV2021. This document was prepared on the instruction of and presented by Homes England and Miller Homes. It appears they are now objecting to their own plans. They have prepared a plan that ostensibly meets with the vision and some of WBC's policies, this has been presented to the public and then they appear to now be backtracking / hedging on such proposals. This calls into question whether the SEWUE as proposed is actually viable / deliverable.