

STRETTON NEIGHBOURHOOD DEVELOPMENT PLAN STEERING GROUP

strettonndp@gmail.com; Facebook 'Stretton NDP'

COMMENTS ON WARRINGTON BOROUGH COUNCIL LOCAL PLAN PRE-SUBMISSION VERSION (PSV)

14 June 2019

1. INTRODUCTION

It is important that Councillors and Examiners understand the history of Stretton in context to the modern world. **You are all** custodians of our community and way of life, and we as the community put our trust in you to protect it for the good of the present residents and also for future generations. Warrington Borough Council (WBC) states that the Health and Wellbeing of its residents is a fundamental objective. Please bear that prominently in your mind.

The preservation of our rural community is vitally important such that history, the rural setting and precious countryside remains protected and that it is not destroyed by planning policies which are ill thought out and unjustified. Plans that dilute our precious way of life and destroy the natural environment, forever, in the case of release of substantial green belt in areas of historical significance.

Historical Context

Stretton village has a long proud history. From former times, the ancient 'King Street' Roman road runs straight through what is now Stretton village, and is still identifiable in several places. From English historical records, the earliest understanding is that the village of Stretton reaches back to the reign of King Henry II (5 March 1133 – 6 July 1189). The village of Stretton was owned by the Starkey family and it is likely that a chapel was built for the family during the 13th or 14th century. In a will dated 1527 the chapel is referred to as the Oratory of St Saviour. In Leycester's History of Cheshire it is stated that in 1666 the "ancient chapel of Stretton" was "ruinous and in decay". St Matthews Church now resides on that site. Stretton Hall, built in 1664 still stands to this day as a grade 2 listed building.

Neighbourhood Community

Stretton Village currently consists of ~450 households, with a further ~180 (40% increase) already approved to be built. There are also ~30 businesses and a deeply established well rounded community. Parts of Stretton are protected with Greenbelt designation for more than 15 years, and is a critical point on the road network for South Warrington access with J10 M56 and the A49 Cat & Lion junction.

About the Neighbourhood Development Plan (NDP) Steering Group

The initiation of a Neighbourhood Plan for Stretton village and its designated area is approved by WBC and it is now an emerging NDP. The NDP Steering Group consists of a diverse group of long-time residents who represent the majority of the village. We recently undertook a public consultation session in Stretton to raise awareness of the residents to the PSV of the Local Plan and its potential detrimental effects upon our village of Stretton. From the feedback at that session, the singularly most highly valued comment was that residents enjoyed and wanted the preservation of the semi-rural environment and open green space. These concerns are integrated within the comments and objections below. They are also collectively available publically on our social media pages.

The NDP Steering Group supports the Borough Council in having to provide a Local Plan for the whole of Warrington and that it complies with any minimum mandatory requirement for housing development as advised by national guidance or standards, working with developers and agencies. As such we are conscious that our NDP needs to work in parallel with the WBC Local Plan and indeed sensibly with other Neighbourhood groups in South Warrington.

However, there are many issues which need clarification and agreement before a satisfactory NDP can be achieved, as highlighted further below in the comments and objections to specific proposed local plan policies which will affect our village.

As an NDP Steering Group, we support the principle that more housing is needed. We accept that Stretton should take a share, as is already happening with current approved developments under construction. We note that in a recent letter from the Secretary of State for Housing, Mr. James Brokenshire, stated that the national standard calculations are target numbers and the actual housing numbers have to be realistic and deliverable. This is very important in so far that Stretton is not flooded by new housing bringing excessive growth, to the detriment of the village and community, where it becomes unrecognizable.

As an NDP Steering Group, we also support the need for a Local Transport Plan (LTP4) concurrent to the PSV to address already existing South Warrington severe traffic infrastructure issues, and future ones that would come with further development. However, we have severe reservations on some of those Local Transport Plan proposals as are noted further below.

Our initial summary is that the NDP group of residents, on behalf of Stretton residents we represent, are disappointed that the council has not paid more attention to the extensive resident's objections which were within the tsunami of comments to the principles, details and evidence to the PDO Regulation 18 consultancy before producing the PSV. The PSV has made only negligible changes following feedback to the PDO and is not sound. Therefore:

1. We do not support the Local Plan PSV where it exceeds minimum mandatory requirement in terms of growth, as it absolutely does not constitute the 'exceptional circumstances' for removal of the extent of greenbelt still proposed in the PSV, dramatically impacting Stretton village. We do not believe adequate detail is provided at this stage prior to submission – there is too much detail held back from the PSV until later.

2. We do not support the extent of housing total in the PSV for Warrington, and therefore not the extent allocated to Stretton.

3. We do not support the proposed LTP4 Transport Plan as standalone document, nor that it is matched to the Local Plan PSV for South Warrington to make it realistic, and deliverable, which consequentially dramatically impacts Stretton.

2. PSV - SPECIFIC POLICY COMMENTS AND OBJECTIONS

There are many parts of this Local Plan, especially those specific to policies TC1 and DC1, defining improvements to Warrington centre, the Centre 6 Master plan and the Waterfront which are very laudable and are welcome as they do provide a vehicle for continued economic growth and resultant population increase for Warrington. In general, the large proportions of the population of South Warrington who currently object to the MD2 Garden Suburb policy and proposal do, in fact, support these central Warrington proposed improvements as most people agree that the centre of Warrington is in need of revitalization, so with these policies WBC seems to have some parts right in the local plan PSV.

However, there is still a large section of the plan which is woefully wrong, including the supposed complimentary Transport Plan LTP4 which is unsound and not deliverable. This includes the drastic effect on air quality from 1000's of additional LGV and HGV's as proposed by new commercial logistics developments and the proposed Port Warrington. Warrington already has a proven track record by the World Health Organization which identifies the town as one of the worst towns in the UK for air quality. All these lead to decimation of South Warrington, especially Stretton and to the detriment of the health and wellbeing of its residents.

The proposals to take precious green belt in Stretton, which is protected by national policy, through the implementation of policy MD2, to satisfy un-needed overestimated commercial and population growth targets is morally wrong and completely against the will of the people. It is incumbent upon WBC to heed and respond to major public criticism of policy MD2 and not just to pursue the dream doggedly to the detriment of a large section of the Warrington community. This Policy, MD2, is unjust, unsound, undeliverable and completely against the wishes of the majority of residents of Stretton and South Warrington. MD2 cannot be used to support the 'exceptional circumstance' in order to justify green belt usage.

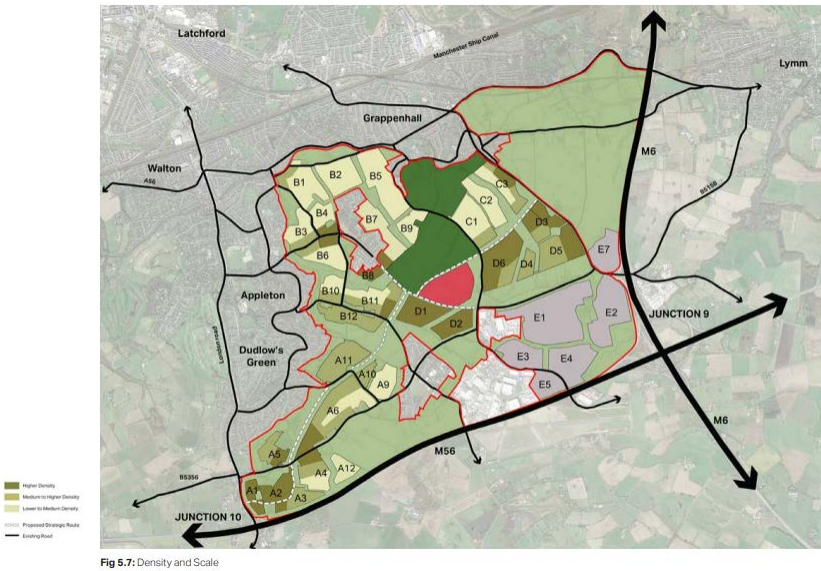
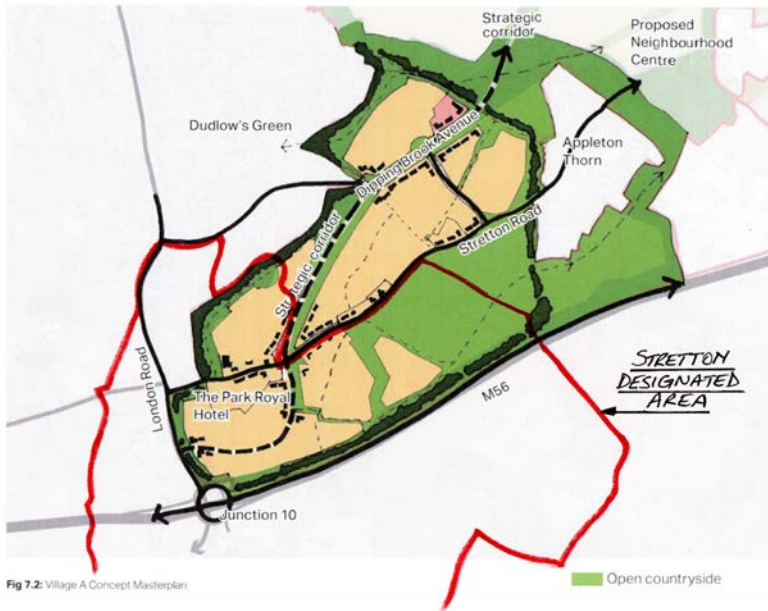
It must be also be recognized that there is a very strong view by the majority of residents of Stretton and South Warrington against policy MD2 and any Garden Suburb, as can be evidenced from local interaction by way of combined local parish council objections, Neighbourhood plan groups, a large social media following, on line petitions and a number of protest groups and that this PSV of the Local Plan is not the correct solution to meet the councils overinflated objectives. Public opinion highlights that WBC has hardly taken any notice whatsoever of the original voice of the South Warrington community with respect to the tsunami of objection to any Garden Suburb development as originally proposed in the Regulation 18 consultancy conducted in 2017. The PSV, although it has made some small

concession and amendments, still requires large scale removal of the green belt in order to satisfy an unrealistic and unnecessary population, economic and housing growth forecast.

Community should be appropriately respected. The proposals in MD2 will in fact destroy the very established and much-loved communities and countryside in South Warrington, especially the community and village of Stretton. MD2 is not being proposed for the greater good of the communities.

That said, some growth and development is needed. If some parts of the ill thought out plans for green belt release for any Garden Suburb were to be approved in future, then Stretton NDP would like to make strong representation as to where and how the policies of the Proposed Submission Version of the Local Plan need to be amended to take into consideration the requirements of our emerging NDP. These comments are aimed at keeping Stretton as an individual inset village, protected by a green buffer zone which will retain the individuality and countryside character of our rural village. Furthermore, the direction of growth should be to limit the additional traffic, especially commercial and industrial traffic within the village. This is already is a major problem at some junctions, and which is leading towards a growing degradation in air quality.

Our comments below, together with the two maps are also aimed at the concept of Village 'A' whereby the boundary transgresses the Designated Boundary of our village, leading to an urban sprawl and against our requirement to maintain a village of rural individuality.



NOTE: The numbering used below follows the individual policy and specific clause numbers used in the Local Plan.

DEV1 – HOUSING DELIVERY

5. The housing figures stated in Appendix 1, Housing Trajectory, bear no resemblance to either the trajectory graphs in either the 2017 or 2018 SHLAA reports. It also has to be questioned as to why the two SLAA reports, issued just one year apart, can report such largely differing figures. Furthermore, Appendix 1 stated that over the 20yr plan period the total house build will be 20284 whereby the housing requirement stated in policy 1 is for 18900.

6. This statement regarding deliverability and its review within the first 5 years is wholly contrary to the NPPF guidelines. It is no use taking the green belt and then deciding 5 years later that it was not a warranted decision. Green belt should only be taken as and when it is justified under exceptional circumstances. This is an excellent demonstration as to how WBC views the wholesale release of the green belt being an acceptable route to land banking and looking at the Garden Suburb as an easy solution without realistically using all other available options for housing development before any green belt usage. Any Green belt release in Stretton should be kept to an absolute minimum.

The number of houses proposed to be built in Stretton by reference to the above map, i.e. parcels A1 - 96, A2 - 170, A3 - 146, A4 - 254, A5 – 180 (already under construction), A12 – 119 giving a total of 965. The extra houses would more than triple the current village size ~450 within in the existing designated boundary. A6 – 595 is technically outside Stretton Village, but within concept Village A. An additional A6 -595, gives potentially 1560 new houses would be over 2,000 houses, which more than quadruples the existing local area housing accommodation. The scale of this proposal is unsustainable and will destroy any resemblance to the rural and countryside character of Stretton Village.

Conclusion: The data supplied to support the stated housing delivery requirement is flawed and cannot be relied upon to demonstrate a credible plan for the village of Stretton. The plan is unsound by way of scale and massing.

We do not support the extent of housing total proposed in PSV for Warrington, nor the extent allocated to Stretton, and the local area immediately adjacent.

DEV 2 – MEETING HOUSING NEEDS

10. According to the 2011 census, 1.9% of the UK population is wheelchair bound. The provision of 5% of new homes to be wheelchair friendly is very laudable policy and this provision needs to be ensured by the individual site developers.

11. There is a growing need for the older generation; especially single people with the inability to climb stairs due to poor health reasons, whereby suitable housing needs to be available. Therefore, housing for older people should stipulate that single storey, or bungalows, should be provided within any development, for either single persons or couples living together. Properties of this type should be available for private purchase and not necessarily part of a council run scheme.

13. Within Stretton, or a Village A, there should be provision made for post NHS hospital care accommodation. Hospitals are choked with beds occupied with patients who have recovered sufficiently not to be in hospital and should be moved out to an aftercare rehabilitation facility. The residents have first-hand experience and evidence that the current Padgate House, and Brampton Lodge facilities in North & South Warrington respectively have an extensive backlog and waiting list.

DEV3 – GYPSIES AND THE TRAVELLING COMMUNITY

3. South Warrington already has a large number of privately-owned permanent gypsy or traveller and show people sites, some of these are within the village of Stretton. WBC should not permit any further applications for such sites within Stretton if permanent provision is to be made elsewhere within any Garden Suburb. Any such permanent site needs to be located away from the main residential areas and with discrete green buffered boundary treatment.

It is generally accepted, even though not looked upon favourably from a location viewpoint, that the permanent type of gypsy facilities housing socially compliant residents does not present a community liability. However, it must be stressed that a transit encampment for the migrant travelling gypsy community should NOT be provided within Stretton or any wider Garden Suburb. Stretton community and WBC has already suffered from criminality and social disruption due to abusive and threatening behaviour by transient members of the gypsy community requiring Police and legal enforcement with subsequent clean-up costs incurred by WBC. This must be avoided at all cost within Stretton and any Garden Suburb.

DEV 4 - ECONOMIC GROWTH AND DEVELOPMENT

The policies generally defined for economic growth and development within existing urban areas, which are key to the improvement in the overall wealth of Warrington are laudable. However, an over optimistic vision for large scale logistic and commercial development would clearly appear to be primarily driven by the financial advantage afforded to high profile

property development companies which is to the detriment of the community. For these reasons alone justification to take green belt for this requirement is not acceptable as it does not meet the conditions of 'exceptional circumstance'.

1- The need for wider strategic employment areas, especially in areas proposed to be removed from the green belt in South Warrington, e.g. Barleycastle trading estate, are not justified from both a population increase or probably from an employment remuneration viewpoint. Furthermore, they will probably not be to the economic advantage to the surrounding community. Employment created by logistics and warehousing, which nowadays is highly automated, use fewer employees and generally employ low technical grade employees. It is highly likely that they will not be paid sufficient salary for them to afford the types of property in any Garden Suburb, those types which will be financially favoured by WBC and developers in any Garden Suburb in order to maximize revenue gain. Furthermore, it is highly likely that these employees will live outside the borough thus adding to commuting traffic. The Barleycastle scheme should not be implemented specifically in this proposed employment area. Growth on the proposed scale of the Barleycastle development cannot be justified for exceptional circumstance for the area to be removed from the green belt. Furthermore, the effect on Stretton will be dramatic as commercial and heavy goods vehicles will preferentially use the Strategic Infrastructure Link from the A49 over to the A50 and onward to the Barleycastle employment area. This will bring more noise, pollution and congestion to the infrastructure within Stretton. There is already a large amount of vacant commercial premises advertised around Warrington. The detailed assessment (evidence) of currently available premises and capacity is not robust, and therefore the assumptions of need for further strategic employment land is overstated and not sound. It is risible that WBC is supporting proposals for release of green belt land for employment use, notable for major logistics companies bring HGVs, while stating in the Transport Plan the aim for Freight Management to use other forms of transport.

4. Refer to 1 above.

11. From information taken from the LTP4 it would appear that traffic modelling for the combined additional HGV, LGV and domestic traffic which will result from proposed residential and commercial developments around the whole of the proposed Appleton and Barleycastle trading estate and any Garden Suburb has not been satisfactorily considered as part of the evidence supporting the plan.

DEV 5 – RETAIL AND LEISURE

- 2- The local centre proposed for Village A is in the wrong location being shown at the extreme north west of the so called village A. Considering that Stretton Village no longer has a viable convenience shop, which was closed relatively recently and converted back to a private residence with WBC planning approval, whereby the council obviously failed to protect the loss of the shop which has had a negative impact on the diversity of the village of Stretton. Any proposed new local centre should be moved towards the centre of the existing village.

8. – see 2 above

DC1 - WARRINGTONS PLACES

10. Stretton village is an inset green belt settlement, as per policy GB1. Therefore, the village A encroachment of the proposed Garden Suburb residential development should not be allowed within the designated area and the village of Stretton should be protected from inappropriate development as per policy GB1.

DC2 – HISTORIC ENVIRONMENT

No Comment

DC6 – QUALITY OF PLACE

1. Any Housing which is proposed to be built within Stretton as part of any Garden Suburb shall be required to strictly comply with this clause. Especially with respect to height. Housing should NOT be high rise and shall be limited to 2.5 storey high. The current three storey development at Henbury Gardens in Stretton is a classic example of what the community does not want to see again.

The following, of which many are central government climate change and environmental initiatives, shall be required to be incorporated in any new development whereby developers shall include the following items under the additional sub headings, in order to promote an efficient, ecologically and environmentally considerate development:

1. Access
2. Appearance
3. Landscaping
4. Layout
5. Scale.

6. Ecology and Environmental

1. Access

- 1.1 All houses shall be provided with a driveway for off road parking for a minimum of two cars. On road parking is to be designed out wherever possible.
- 1.2 Visitor parking areas for at least 3 cars shall be provided at some point along each primary road.
- 1.3 Garaging shall be provided within each property for a minimum of one car. Garages should be sufficiently large to allow a typical C-segment hatchback size vehicle to be driven fully into the garage and still be able to open the driver's door to get out of the vehicle comfortably
- 1.4 All Primary roadways shall have a pavement on at least one side of the road.
- 1.5 A turning circle provision shall be provided at the end of each no through road or private road for WBC waste vehicles or delivery vehicles.
- 1.6 A post box shall be provided within each development.
- 1.7 Primary roadways within a development shall be provided with street lighting utilising LED lighting fixtures.
- 1.8 Footpaths and public walkways within a development shall be provided with LED lighting fixtures to provide safety and security for pedestrians and cyclists.

2. Appearance

- 2.1 No housing units shall exceed two and a half storeys high. A maximum of 25% of houses shall be two and a half story high.
- 2.2 All houses will be serviced with underground telephonic, television reception and broadband internet facilities. This is to avoid unsightly externally mounted satellite dishes.
- 2.3 All houses are to be provided with concealed wheelie bin storage facilities such that bins are not permanently in general view.
- 2.4 The architecture of all dwellings shall be similar in design to the surrounding existing developments and have some defining features.
- 2.5 All houses shall have a complete outer skin of brick or stone. External wooden cladding shall not be provided as they suffer from high maintenance.

3. Landscaping

- 3.1 Footpaths, cycle ways and public walking routes shall be provided throughout a development such that they provide a means to connect and link up to adjacent new or existing developments, private roads within a development and any established Rights of Way.
- 3.2 Adequate dog dirt bins shall be provided along public walking routes throughout the open spaces and green corridors.
- 3.3 Adequate tree planting shall be provided along all primary and private roads. Preferably they shall be blossom trees.
- 3.4 All houses shall have a front garden.
- 3.5 All houses shall have a back garden.
- 3.6 All roadways shall have grass verges.
- 3.7 All roadways shall be tree lined.

4. Layout

- 4.1 A Pedestrian crossing to be provided across the primary road entrance to any development.
- 4.2 At least one Bus stop lay by shall be provided adjacent to the primary entrance road for each development.
- 4.3 All developments which are adjacent to each other shall have interconnecting walkways and cycle ways to avoid developments becoming isolated communities.

5. Scale

- 5.1 The height of the tallest point of any roof line shall not exceed 10M from grade level.

6. Ecology and Environmental

- 6.1 All houses shall be fitted with external electric vehicle charging connectivity.
- 6.2 All housing with a suitable roof aspect, generally facing south, shall be fitted with Solar Panels for electricity generation and/or thermal energy capture.
- 6.3 All houses shall be fitted with rainwater harvesting storage systems for use with toilet flush systems.
- 6.4 All houses to be fitted with basic building energy management systems with smart connectivity.

6.5 All houses shall include something form of low-carbon heating (heat pumps), district heating or combined heat and power system.

ENV1 – WASTE MANAGEMENT

2g. The replacement Sandy Lane Recycling Centre to serve the South of Warrington must not be located within any area of Stretton village or anywhere constituting any Garden Suburb or upon land recovered from the green belt. It needs to be built in a location compliant with sub clauses 2a. – 2g. Ideally: within the existing Barleycastle trading estate area.

ENV 2 – FLOOD RISK AND WATER MANAGEMENT

1. All of the many local ponds within any area of development shall be retained and incorporated within that development. Retention of these is to maintain the local waterway surface run off facilities and storm water attenuation, continue to provide habitat for local wildlife and to preserve the character of the local countryside and environment.

8 . See 1 above

14. Any new development which has a boundary adjacent to any existing domestic property, or surrounds a set of existing properties, where those existing properties utilize onsite septic tank(s), shall make local connection provision for those existing properties to be connected to the new development foul sewage network.

ENV 7 – RENEWABLE AND LOW CARBON ENERGY DEVELOPMENT

4. Refer to additional items under DC6 – Quality of Place: specifically, item 6.2. Furthermore, all community buildings, however small their internal floor area is, shall also be constructed to accommodate solar power installations such that they can contribute to renewable and low carbon efficiency.

5. It needs to be stipulated that any proposed logistic developments or national distribution centres shall all be designed and constructed with rooftop solar power and hot water installations. These large roof buildings are ideal for renewable energy sources.

MD2 WARRINGTON GARDEN SUBURB

Notwithstanding the objection to the whole of the plan regarding any Garden Suburb to remove land from the green belt in the opening statement, the following are specific comments on the policy MD2 in the case that parts of the Garden Suburb is approved.

MDA 2.1 Key land Use and Infrastructure Requirements

- 2.** There is a contradiction with the housing numbers as defined in Policy DEV1 (3a). All comments under DEV1 stand. There should be no allowance for the approximate 2300 homes to be built post plan period over and above those built during the plan period. This is an unnecessary and unjustified use of the green belt and can be considered as land banking.
- 3.** The villages should be given specific names and not just A, B & C as this tends to indicate that they are independent of the existing communities. It is important to note that Village A incorporates the designated area which will lead to an urban sprawl from Stretton viewpoint (see following comment)
- 4.** Stretton is also an inset village washed over by the green belt and should be afforded the same considerations as Appleton Thorn. Stretton needs to maintain its distinct identity and any new housing should have a green buffer at the designated boundary to maintain countryside separation. Any development within the Stretton designated area shall be described as Stretton and not Village A. Stretton has an emerging Neighbourhood Development plan and with agreement with WBC Stretton's developing policies as described within the comments against MD2 need to be aligned with any agreed future Local Plan.
- 5.** (e) Stretton is already subject to residential development; parcel A3, which forms part of a preparatory potential Local Plan and together with additional residential developments, which may be agreed for future development Stretton will quadruple in size. With this in mind one of the three local centres should be in the designated area of Stretton and not as shown on the eastern boundary of Village A concept. Stretton currently no longer has an effective retail centre.
 - (i) Refer to earlier comments in DEV3 (3). These 8 No. proposed pitches should be designated for the permanent gypsy community. They should not be made available to the transient travelling gypsy community. Furthermore, the site needs to be located on the outskirts of any Garden Suburb and not located centrally or within any of the residential village areas.

(j) The recycling centre should not be located within any of the village areas or near local centres. Ideally it should also not be located within the neighbourhood centre but on the outskirts and preferably in the existing employment area.

MDA 2.2 DELIVERY AND PHASING

7. A target date for the publication of the Supplementary Planning Document (SPD) should be given.

MDA 2.3 DETAILED SITE-SPECIFIC REQUIREMENTS

24. Refer to 5(e) (i)

30. Funding must be in place before the start of any residential development.

35. The local centre for Village A is not located centrally. However please refer to comment under 5(e) above.

37. A new health facility should be provided for Stretton village or within Village A. Funding must be in place before the start of any residential development and the facility operational before the development is completed.

39. Stretton Village should be included in this clause.

42. Car parking provision needs to be provided for access to any country park, together with a bus stop.

43. Stretton Village should be included in this clause.

53. The following boundary needs to be added to this clause. i.e. The green belt boundary to the west of any Garden Suburb shall be defined by the roman road, King Street, with a green buffer zone eastward to the topographical ridge line. (this is as originally defined boundary limit of the garden suburb as defined in the PDO Reg 18). This will complement and preserve the historical significance of Stretton village. This is shown as originally defined in the PDO concept maps below.

55(d). Measures need to be implemented to stop HGV's from using the strategic Infrastructure link through residential areas. The connection of the strategic link at the western end needs be a single carriageway utilising the existing exit off J10 M56 currently only serving The Stretton Fox. There is no evidence that there is need for a dual carriageway if this road is for domestic

and residential traffic only, and noting the implausibility the Mass Transit system at the point of the M56 J10 location. Please refer to the paragraph and map regarding the Strategic Infrastructure link further below.

63. See comment at ENV1 (2g) re recycling centre outside any Garden Suburb residential area.

64. Refer to additional items under DC6 – Quality of Place: specifically, items 6.2 – 6.4 regarding energy and water efficiency. Any decentralized energy system (whatever that realistically means) must not include wind turbines within residential areas.

66. One major way to mitigate noise and air quality pollution impacts within any Garden Suburb will be to not allow the proposed large-scale logistics employment and stop the impending catastrophe of thousands of HGV and LGV vehicles using any Garden Suburb strategic infrastructure.

3. GREEN BELT RELEASE

WBC Council's figures for Green belt are that 90% of the Green belt will be retained. However, the complete picture is that only a small fraction of WBC is Green Belt, but the Local PSV proposes to release more. That decision is not sound, and it is against the policies of the NPPF as it does not justify 'exceptional circumstances' to release the extent of land proposed.

Warrington will lose approximately 10% of its Green Belt however nearly 90% of that is in South Warrington – this is unnecessary and disproportionately spread across the Borough. There should be no loss of greenbelt unless and until the economic benefits have been fully and openly appraised, and only then that they meet exceptional circumstances. It is not sound to justify loss of ~10% of existing Greenbelt because other councils already did the same (reference to promotional material in PSV consultation).

The National Planning Policy Framework (NPPF) states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) Recognising 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;
- d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

We do not support the local plan where it exceeds minimum standards in terms of growth, as it does not constitute 'exceptional circumstances' for removal of the extent of greenbelt proposed, which dramatically impacts Stretton. We do not believe adequate detail is provided at this stage prior to submission - too much detail is held back.

Green Buffer Zone requirement

Reference must be made to the PDO plan for Stretton whereby some fields were not originally defined for development and were left as open countryside, i.e. parcels A1 and A2, and a green buffer zone were identified to preserve the rural character of the village, as shown on the two maps below. This was acceptable at the time of the Regulation 18 consultation. The view from the A49 when entering the village is an extremely valuable view of the open countryside over

towards St Matthew Church which gives the rural character of the village. That character needs to remain intact.

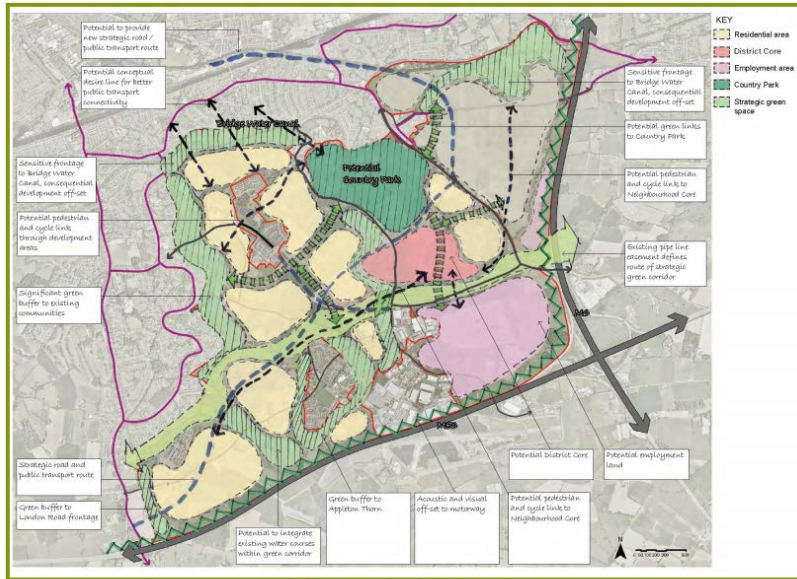


Figure 7: Warrington Garden City Suburb

Appendix 4 – Garden City Suburb – variations of allocation / safeguarding with density

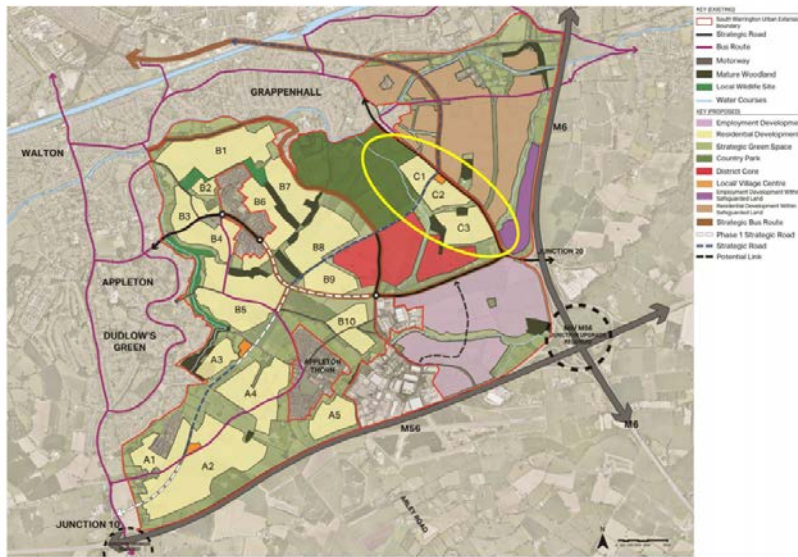


Figure 3.6: Framework Plan

However, in this latest version of the PSV this is no longer the case and parcels A1 and A2 have changed location and size such that all the green buffer zone has been destined for residential development. This is a change that is of great concern which Stretton does not want. It completely destroys the rural character of the village. As stated in policy 53 reply above, this

openness should be preserved and it is unclear as to why this change has happened; other than from pressure from developers and landowners.

From the current plan, parcels A4 and A12 are destined for development in Phase 4, with a degree of land banking for development after the 20-year plan period as defined in policy MDA2.1(2). This is unacceptable when areas of land which are crucial to the retention of the rural openness of the village are being targeted for development in Phase 1 and 2. Parcels A1 and parts of A2 should remain open countryside and parcels A4 and A12 developed as the more acceptable option.

Preservation of existing Trees & Shrubs

The NDP Group do not support the extent of development proposed, however do accept that some development is needed. The current plans have been drawn up without reference of connection to the existing areas, and individual mature trees and shrubs. While release of certain parts of flat land from Green Belt may be acceptable, this should be limited to such areas of flat land, and the vast majority of land where there are existing mature trees, shrubs or hedgerows, to have formal ongoing legally binding protection, whether as Green belt, or with local 'Tree Preservation Orders' imposed by WBC on specific trees, areas or existing groups of vegetation. This will serve to minimize the impact of the release of even small amounts of green belt for development.

Future Safeguarding

No land should be removed from the Greenbelt for future safeguarding for development.

4. LOCAL TRANSPORT PLAN LTP4

The LPT4 and Executive Summary define a high-level approach to the challenges of the many transport problems in and around Warrington, which are primarily from congestion and air pollution. The document title states that it is a PLAN, but does not contain sufficient realistic detail to give credibility to a plan. It appears to be futuristic and aspirational in its view to resolve the major and minor issues which face the town. Most of the initiatives are medium to long term investigations and not beneficial implementable plans and which will not benefit or complement the Warrington PSV Local Plan in a timely manner such that LPT4 actively supports the development of the new PSV, especially from the south of the Borough. In fact, most of the mass transit and alternative fuel solutions only come into view in the later phases of the PSV. Remedial solutions and actions should be taken as early as possible to gain advantage over the proposed PSV development such that the current situation is not exacerbated in the short term. Therefore, it can be considered as an unsound plan with regards to any credible major solutions to Warrington's transport challenges.

The LTP4 to the extent that it is by admission of Council Officers at the Halliwell Jones Stadium consultation is that the transport plan is merely aspirational and is not fully funded. Taking the LTP4 and the LP together will result in a traffic choked undesirable and over developed Stretton, however, the proposed development in the LP without significant changes to highway infrastructure would be simply unworkable.

There appears to be no credible evidence base for how the proposed increase in cycling/walking can be achieved. There is no comparison with what other towns/cities have had to do to get such a socially accepted transition. Critically the topography / elevation is missing, so the fact that most of South Warrington on the Cheshire Plain is 80m higher than Warrington centre (steep slope) and the land North of the Manchester Ship Canal, making cycling / walking to Warrington centre more unrealistic.

The Transport Plan does not adequately address the pre-existing transport issues in South Warrington, which inhibit access to Warrington Centre, and the extensive major, retail and leisure facilities north of the Ship Canal, due to constraints in the waterway crossing, and the steep slopes. The Local Plan PSV is therefore unsound, as it proposes growth without addressing the pre-existing transport issues, prior to considering incremental growth.

Stretton village is bisected by the M56. The local plan does not address any of the problems of the part of the Lower Stretton village south of the motorway. The A559, Northwich Road through Lower Stretton is too narrow and unsafe, certainly for pedestrians, cyclists and even for the current size and volume of vehicles passing through that part of the village. Its problems

have been raised with WBC on numerous occasions with no satisfactory conclusion. The Local Plan should take into consideration the traffic impacts in this part of the village as a holistic approach to the severe potential impacts of an ill thought LTP4.

Weight restrictions and speed limits need to be properly enforced and pedestrian/ cycle crossing points in Lower Stretton, J10, Stretton Rd opposite St Matthew's and London Road by the cricket pitch.

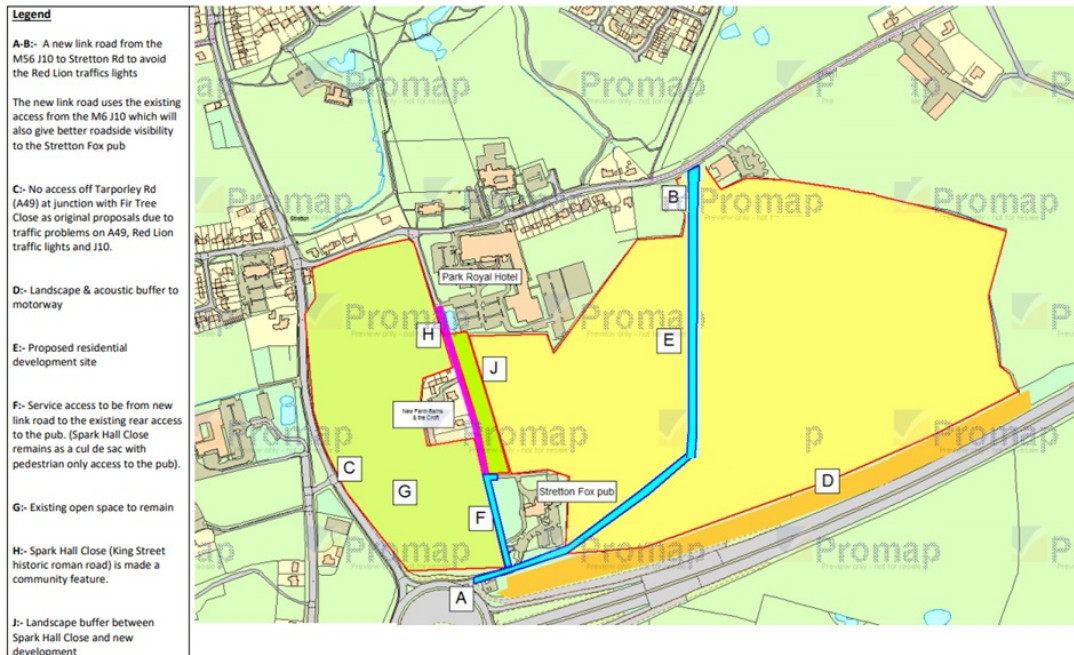
The traffic modelling takes no account of the volume of traffic that diverts from the motorways onto the A roads when the M56 / M6 are at a standstill which is very frequent, especially with practice of closures of Thelwall viaduct due to high winds.

Garden Suburb Strategic Infrastructure Link.

This link, described by the PSV documentation as an **illustrative link**, it is also termed as an 'enhanced contingency'. It has been indicated as a conceptual route on the PSV maps running from the A49 in Stretton via any Garden Suburb to meet up with the B5356 where the proposed Six/56 logistics centre and then on to the A50. It would seem realistically obvious that this will become a regularly used route for LGV and HGV's accessing the commercial development at Barleycastle Trading Estate. Despite a hastily prepared slide and an assurance produced by WBC which intimated that some form of restriction for goods traffic would be in place. It is therefore realistic to accept that this will become a heavily used goods and freight traffic route. As with existing weight restrictions through Appleton Thorn, which are already regularly ignored, it is indicative that the GS Strategic link will be a goods vehicle thoroughfare. **This will have a dramatic effect upon Stretton.** As stated in the WBC 'Infrastructure Delivery Plan 2019' the estimated cost for this road is £93M and which there has no source of funding been identified. Yet again it is planned for the medium term 2023 – 2028 despite assurances from WBC that Infrastructure developments will be in place before housing is developed.

The vision of the enhanced contingency comprising of a part dual carriageway road being made for a futuristic mass transit system is totally aspirational. Without car parking areas or a Park and Ride system coupled with estimated population growth from the PSV in the source area within Stretton and by Junction 10 M56 it is conjectured that the scale of this solution could not support the investment required. There are some serious practical limitations with crossing the 3 East-West waterways in South Warrington (River Mersey, Manchester Ship Canal with high level clearance required, Bridgewater Canal) and the additional topography (requiring bridges), nor route which may require compulsory land purchase. There is no credible information as to how, or how this would be achieved, and a plan reliant on reduction of motor vehicles use, and increase of Mass transit system use is not sound without it.

It is considered that the proposed connection to the Strategic infrastructure link being connected at a point along the A49 in Stretton, as illustrated by the WBC maps, is a sub optimum solution. It will continue to exacerbate congestion along the A49. The better solution would be to get traffic destined for any Garden Suburb away from the A49 completely and route it directly off the junction 10 island. The more suitable option would be to firstly keep this roadway a single carriageway and not the 40m wide enhanced contingency dual carriageway, and secondly make use of the existing exit of Junction 10 as it was originally the old connection to Spark Hall Close. The route could then serve the requirements of the local plan through the proposed residential developments of land parcels A2 and A3 as indicated by the blue line on the map below.



WBC proposes to conduct a study on the LTP4 within 5 years. As transport is a critical issue to South Warrington, and therefore the PSV it is not sound to progress with such an extent of LP PSV prior to an effective study being completed.

5. SUMMARY AND CONCLUSION

In reference to our introduction, yes, progress is needed and Stretton needs to accommodate a sensible amount of development which our community can support, but at an acceptable cost to the community and countryside and historical significance of our community and environment. Stretton already has a development of 180 homes underway (40% growth) which will bring greater demands upon the existing services and infrastructure.

WBCs own documents on proving soundness of the Local Plan means the PSV needs to be:

1. Positively prepared: Providing a strategy which as a minimum seeks to meet our objectively assessed development needs
2. Justified: Providing an appropriate strategy which is evidence based. WBC must have considered reasonable alternatives in preparing the plan
3. Effective: The Plan must be deliverable over the plan period and be based on effective working on cross boundary strategic matters
4. Consistent with National Policy: including the National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance (NPPG)

Our conclusion, based on all our above comments and objections is that in each of the 4 criteria above that the soundness of the PSV has failed and that parts the plan is in fact very unsound, specifically with regards to the Garden Suburb.

- Stretton MUST be protected from inappropriate housing development currently proposed at >300% increase in size.
- Stretton MUST be protected from unjustified release of the extent of green belt as the circumstances are not exceptional to justify the level of release proposed by PSV.
- Stretton MUST be respected and treated as an individual community with its own green buffer.
- Stretton MUST be protected from an unsound LTP4 which will result in unnecessarily dramatic increase additional traffic.
- Stretton MUST be protected from additional pollution and noise as a result of an unsound LTP4.

The evidence and proposals presented by the PSV and LTP4 do not provide credible justification for the detrimental changes defined which will dramatically affect Stretton.

Therefore, we do not support the PSV and LTP4 Transport Plan as standalone proposals, and that they are not matched to the WBC vision of a Garden Suburb for South Warrington, which dramatically impacts Stretton. Furthermore, the PSV & LTP4 do not adequately address comments made by residents during the previous consultations.

As an emerging NDP we value highly the opportunity to work with WBC in the formulation of a local plan PSV which will be supportive of the development of our community and village of Stretton. We urge you and all who pass judgement upon the PSV and LTP4 to work with the neighbourhood, communities and their representatives such as the NDP to achieve a solution acceptable to the majority, and compliant with the minimum legal requirements.

As the Stretton is so heavily impacted by the PSV, if WBC decides to proceed to submission without further significant changes, we request that at any future hearing by the Planning Inspectorate, that the Stretton NDP Steering Group have the opportunity for a member to attend and participate.

Issued by Stretton NDP 15/06/2019