



Introduction

This is the response from Our Green Warrington to the Proposed Submission Version 2021 produced by Warrington Borough Council.

Our Green Warrington comprises a group of volunteers who care about our green spaces, our environment, our architecture, our community and our sustainable future. We have a keen interest in history, heritage and placemaking and regularly produce ideas for a green, attractive and interesting town via our website www.ourgreenwarrington.com.

We recognise the need for development, but we place an emphasis on preserving our most precious green landscape and the protection of our woodlands, waterways and wildlife. We also celebrate great placemaking - attractive homes, public buildings and community spaces with a sense of history and place that will encourage us to take care of them. Creating a sustainable, happy and healthy environment that we are all invested in will help to secure a positive legacy for future generations.

We are grateful to Warrington Borough Council for revising the PSV 2019 Local Plan to produce PSV 2021 following responses from the public. There are many excellent objectives and policies within, particularly in relation to the town centre, proposed new waterfront and the plans for improving active travel routes. We also welcome plans to enhance the River Mersey, which as rightly noted, has historically been overlooked as a great natural asset. Our specific comments in response to aspects of the plan are set out below. Thank you for taking the time to consider them.

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1. Executive Summary

This document will explain why the PSV 2021 and in particular the proposed South East Warrington Urban Extension (SEWUE) does not at present meet the test of “**soundness**” as set out in the **National Planning Policy Framework (NPPF) 2021**.

The SEWUE plan does not meet the requirements of **paragraphs 35 (b) and 35 (d)** in that the PSV 2021 SEWUE current plan does not amount to an “appropriate strategy”, does not meaningfully take into account “reasonable alternatives”, and is not based on “proportionate” evidence.

The PSV 2021 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 ASNW 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.”

Warrington Borough Council’s stated “Objectives”, “Strategies” and “Policies” contained in the PSV 2021 would not be met with the current plan due to the nature and location of the proposed South East Warrington Urban Extension.

Biodiversity, key habitats, ecological networks and natural green infrastructure

The proposed site of the SEWUE will the 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. It will also impact negatively on the visual amenity and setting of designated conservation areas and listed buildings.

This includes the following:

- Ancient woodland: The Dingle (ASNW/LWS/SBI) Lumb Brook Valley
- Ancient woodland: Fords Rough (ASNW/LWS/SBI) Lumb Brook Valley
- Woodland: Parr’s Wood (LWS/SBI) Grappenhall Heys
- Woodland: Beech Wood (LWS/SBI) Grappenhall Heys
- Lumb Brook Millennium Green
- Bridgewater Canal

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- Woodland: Dipping Brook (*this is already subject to consented mass development on its remaining open side)
 - The Mersey Valley Timberland Trail
 - The Lumb Brook Millennium Green
 - Various marl ponds
 - Landscape between Parr's Wood and Stockton Lane providing supporting wildlife habitat, and sweeping vistas to the Bridgewater Canal and further north to St Elphin's Church
 - Grappenhall Village conservation area
 - York Road and Victoria Road conservation area
 - Listed buildings including farm buildings and Lumb Brook Bridge (aqueduct)

The PSV 2021 SEWUE does not meet the requirements in the following guidance / frameworks:

- **NPPF 2021 paragraph 174 (a), (b), (d) and (e)**
- **NPPF 2021 paragraph 180 (c)**
- **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**

There has been no impact assessment at the sites of the ASNW. The Sustainability Appraisal refers to these sites only as "mature woodland", not ASNW, which is misleading.

The PSV 2021 SEWUE plan puts the ancient woodland 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.

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 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.

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.

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.

In spite of **The Woodland Trust's formal objection** to use of their woodlands as part of Warrington Borough Council's strategic green space in any draft Local Plan, the above mentioned ASNW, LWS and The Mersey Valley Timberland Trail have been incorporated into the SEWUE, with the Sustainability Appraisal referring to the ASNW as "green infrastructure corridors".

The PSV 2021 SEWUE ignores **The Woodland Trust's formal objection to the PDO 2017 / PSV 2019** proposed development sites, which remain the same sites in the PSV 2021 SEWUE, specifically;

"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. "

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.

In the following pages are plans and images of the current proposed SEWUE and the impact it will have on wildlife habitats and ecological networks - and also the surrounding existing settlements who are currently able to easily access them.

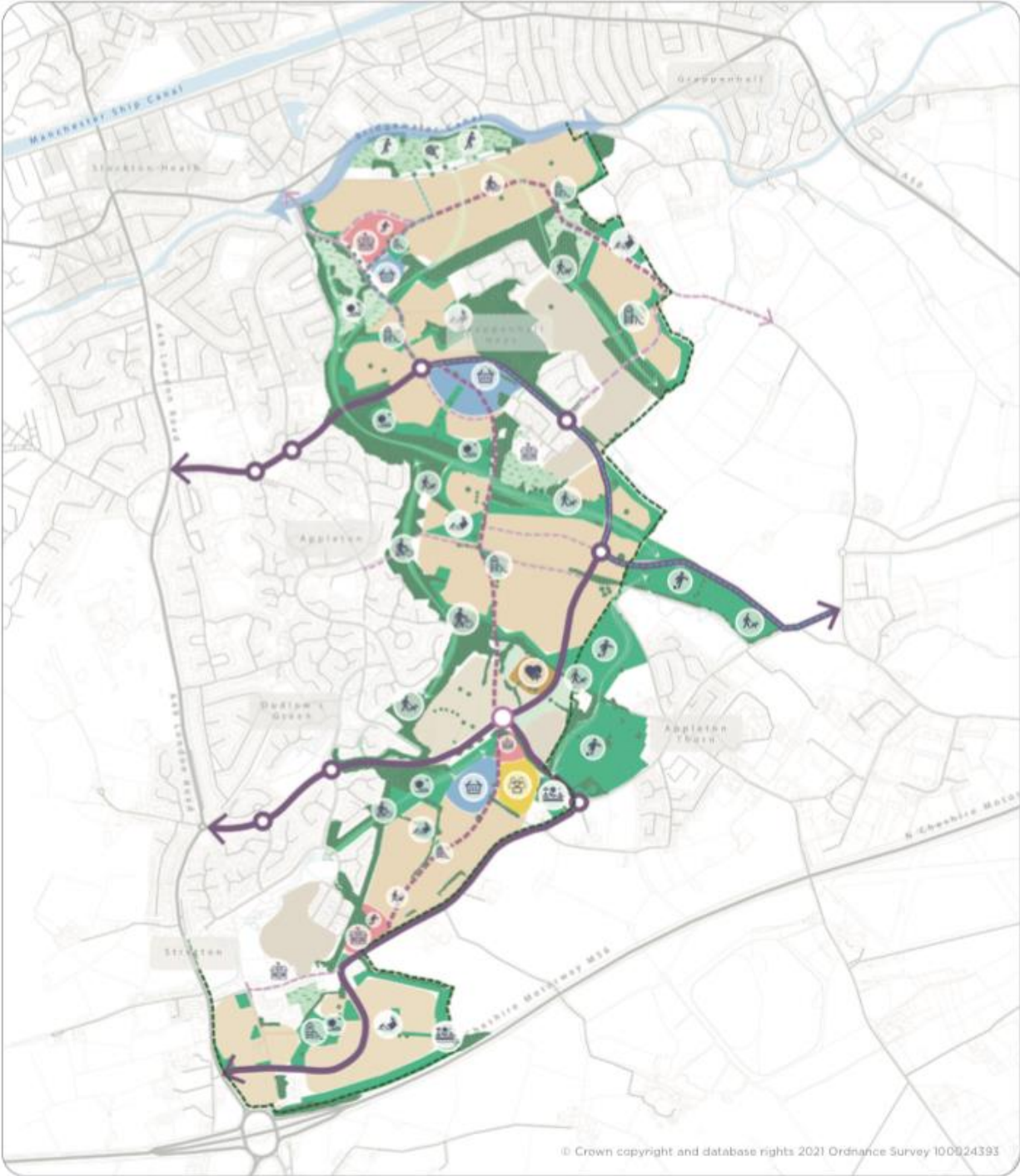
















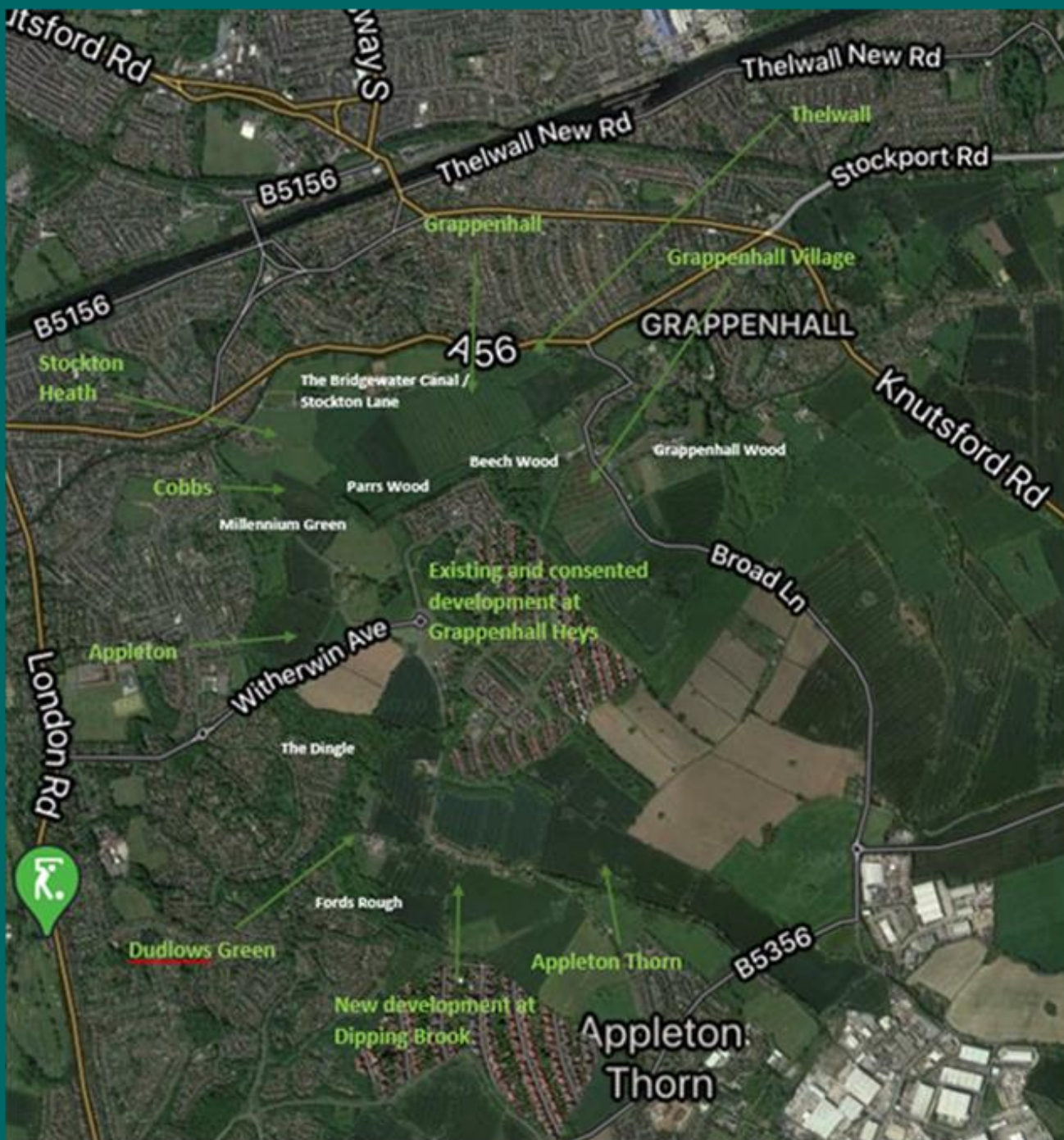


Figure 3. Indicative Masterplan Framework

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|--|--|
|  Established Tree Groups |  Indicative Strategic Highway Network |
|  Existing Open Space |  Indicative Mass Transit Safeguarded Corridor |
|  Indicative Green Infrastructure |  Indicative Low Traffic Community Connector |
|  Indicative Residential Development |  Local Links |
|  Indicative Local Centres |  Green Links (to include active travel) |
|  Indicative Education |  Consented Development Schemes |
|  Indicative Healthcare |  Existing Connection Along Bridgewater Canal |
|  Indicative Community Hub |  Revised Green Belt Boundary |

Key LWS and ecological networks, currently accessible by existing and new communities that will be adversely affected by the current proposed SEWUE



Public Amenity

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.

The settlements that will be directly impacted from the current SEWUE are:

- Appleton
- Grappenhall
- Grappenhall Village
- Appleton Thorn
- Thelwall
- Dudlows Green
- Wrights Green
- Cobbs
- Stockton Heath

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”.

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.

The proposed SEWUE, given its location adjacent to already dense suburban settlements, will not only place considerable pressure on roads and infrastructure designed for far fewer homes, it will put pressure on existing services, amenities and schools.

Agricultural Land

The PSV 2021 SEWUE in its current form **will remove a significant amount of Grade 2 and Grade 3 agricultural land** from South Warrington. The **Sustainability Appraisal** notes that the land at the proposed SEWUE “mostly comprises Grade 2 (206 hectares) and some Grade 3 (70 hectares) agricultural land. Much of the agricultural land is in existing agricultural use. Cumulatively, development would result in the permanent loss of approximately 276 hectares of important agricultural land resources, which is more than double the amount involved at other strategic locations (particularly in terms of the mix of Grade 2 to Grade 3 land). **As a result, major negative effects are predicted.**”

Unique Character and Landscape

The **Sustainability Appraisal Landscape Character** and **Heritage Impact Assessment** prepared in conjunction with PSV 2021 notes that the proposed SEWUE will have an impact on the unique character and setting of the area and will significantly and permanently alter the landscape. The landscape to be developed under the current SEWUE is of particular natural beauty, a broad sandstone escarpment that is not only home to stunning natural wildlife sites in South Warrington, but offers unique sweeping and open vistas, north to the town centre and south to the Cheshire plains. The **Landscape Character Assessment** that forms part of the PDO 2017 evidence base: Natural Environment and Climate Change, says of this area;

“The main objective for these areas should be to aspire to retain their present status as a well-managed agricultural landscape. **The currently proposed large areas of housing development however works against this objective and will cover some of the most attractive landscape in the Borough**”.

Design and Quality of Place

Homes England and their partners are not appropriate parties to have responsibility for mass development adjacent to and impacting so many important ecological habitats. This document will show that Homes England and / or their previous iterations have not demonstrated an understanding of or commitment to protecting and enhancing these habitats – for example, in their 2016 ‘Call for Sites’ document, “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”. Nor have they 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:

“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 is its layout is often unsympathetic to the landscape.”

The volume developers who have already worked with / are working with Homes England and its predecessors to produce housing in the area have created monocultural housing estates, heavy in tarmac and which are not sensitive to the character and nature of the area. They are not distinctive settlements with a sense of place and identity. These developments rely on the landscape around them to make them attractive to buyers – they bring little to the area in their own right.

Aim of this Response: Proposed Modification / Alternative Plan

This document will show that the proposed SEWUE is in conflict with the aims and policies set by current and proposed legislation relating to the environment and the climate emergency. It also conflicts with Warrington Borough Council's own stated aims regarding protection of the natural environment.

The Sustainability Appraisal prepared by AECOM sets out Warrington Borough Council's reasoning for choosing the current SEWUE site, being chiefly;

1. Green belt assessment criteria conclusions
2. Ownership of the land proposed in the SEWUE
3. Proximity to Stockton Heath / existing amenities and public transport

We would submit that these are not "wholly exceptional reasons" required by UK government guidelines for proposing development that will directly and negatively impact, possibly irreparably, irreplaceable ancient woodland, key ecological networks and habitats and natural green and blue infrastructure, including The Bridgewater Canal and The Mersey Valley Timberland Trail.

The proposed SEWUE has been justified on the basis that it preserves the strongest green belt, that the land to be developed is already in the ownership of Homes England - which will make deliverability easier and because it is reasonably proximate to Stockton Heath.

Where development based on local green belt assessment policy conflicts with national policies and guidance relating to environmental and ecological protection, including protecting and enhancing ancient irreplaceable woodland, established woodland shelter belts, the wildlife supported by these woodlands and nearby waterways, other nearby Local Wildlife Sites / SBI, preservation of Grade 2 and Grade 3 agricultural land, protection of visual amenity and the unique beauty and character of the landscape, we would submit that the latter should prevail.

This document aims to show that **subject to Warrington Borough Council establishing that "exceptional circumstances" exist to justify removal of green belt** for development, and subject to Warrington Borough Council first providing the infrastructure upon which the SEWUE is based, an alternative viable option exists for development that will impact fewer settlements and protect key sites of biodiversity in South East Warrington. It will also provide the opportunity for careful and sensitive development at a new "destination" village by architects and masterplanners skilled in developing in semi-rural areas.

We intend to demonstrate, with relevant maps and images, why development at the current proposed SEWUE will irreparably harm the landscape, key ecological habitats and sites of biodiversity; unacceptable at any time but particularly given the climate emergency. The SEWUE will also damage the existing community's quality of life and degrade the value of natural assets Warrington is fortunate to have.

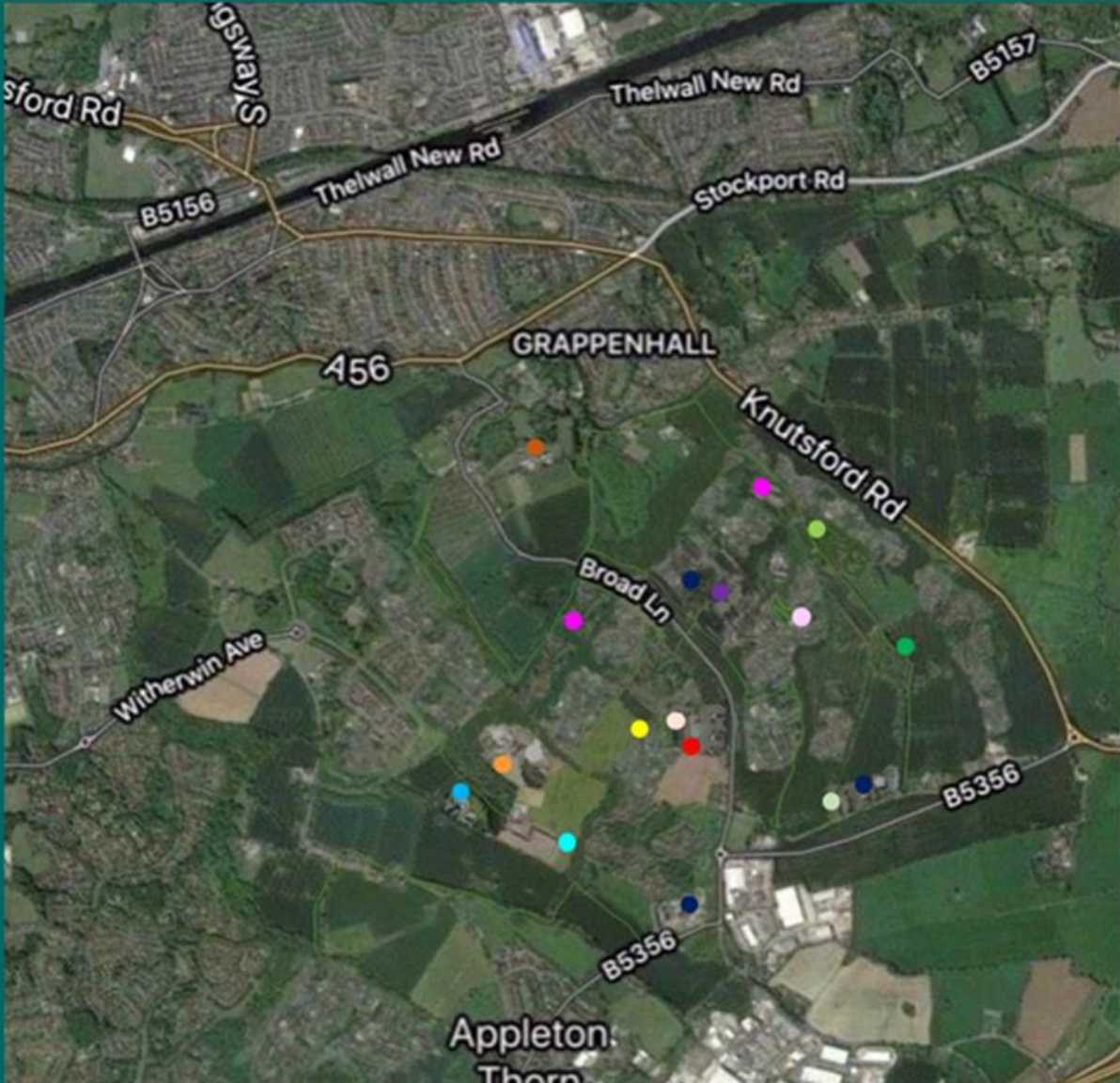
On this basis we propose a modification to PSV 2021 and specifically the SEWUE that we feel better meets more of the objectives and policies set out in the proposed Local Plan along with national policies and frameworks – and ask if Warrington Borough Council would be kind enough to consider it. The proposed modification is based on a site under consideration for the SEWUE (called “Option 4” in the PSV 2021 and Sustainability Appraisal) but has currently been ruled out in favour of what we submit is the far more damaging “Option 2” in the PSV 2021 and Sustainability Appraisal. We believe that choosing Option 4 for development, should Warrington Borough Council consider it, will negatively impact the fewest settlements and therefore people, will protect and preserve key ecological sites, fragile ecosystems and irreplaceable habitats and be a more sustainable and equitable option for South East Warrington.

Current SEWUE

SEWUE proposed by Our Green Warrington

Development built onto to existing settlements already heavily burdened with mass housing although close to Stockton Heath and Appleton	Spreads the burden of development yet still remain within walking distance of the services and amenities of Grappenhall, Thelwall, Grappenhall Heys and Appleton Thorn
Loss of existing settlements’ access to open, stunning countryside, loss of “breathable space”	Preserves accessible, stunning open countryside and “breathable space” for existing settlements
Increased air and noise pollution and increased traffic congestion in concentrated location	Spreads the burden of traffic to include a major A road
High risk of irreparable harm to key sites of biodiversity, including South East Warrington ASNW, The Dingle and Fords Rough, LWS / SBI Parr’s Wood and Beech Wood, ecological network, The Timberland Trail and key blue infrastructure, The Bridgewater Canal	Protects key sites of biodiversity, including South East Warrington ASNW, The Dingle and Fords Rough, LWS / SBI Parr’s Wood and Beech Wood, ecological network, The Timberland Trail and key blue infrastructure, The Bridgewater Canal
Loss of 276 hectares of Grade 2 and 3 agricultural land	Loss of 202 hectares of Grade 2 and 3 agricultural land
Loss of the most stunning natural landscape with sweeping views north to the town centre and south to the Cheshire plains to development.	Loss of pleasant but unremarkable natural landscape mainly adjacent to the A50
A masterplan for development prepared and executed by Homes England and partners, with a poor track record of protection and enhancement of biodiversity and green infrastructure, good design, architecture and sense of place that is in keeping with its surroundings	An opportunity for careful and sensitive development at a new “destination” village with architects and masterplanners skilled in developing in semi-rural areas, with reference to local vernacular and input from the local community

Proposed Modification / Option 4 Indicative Plan



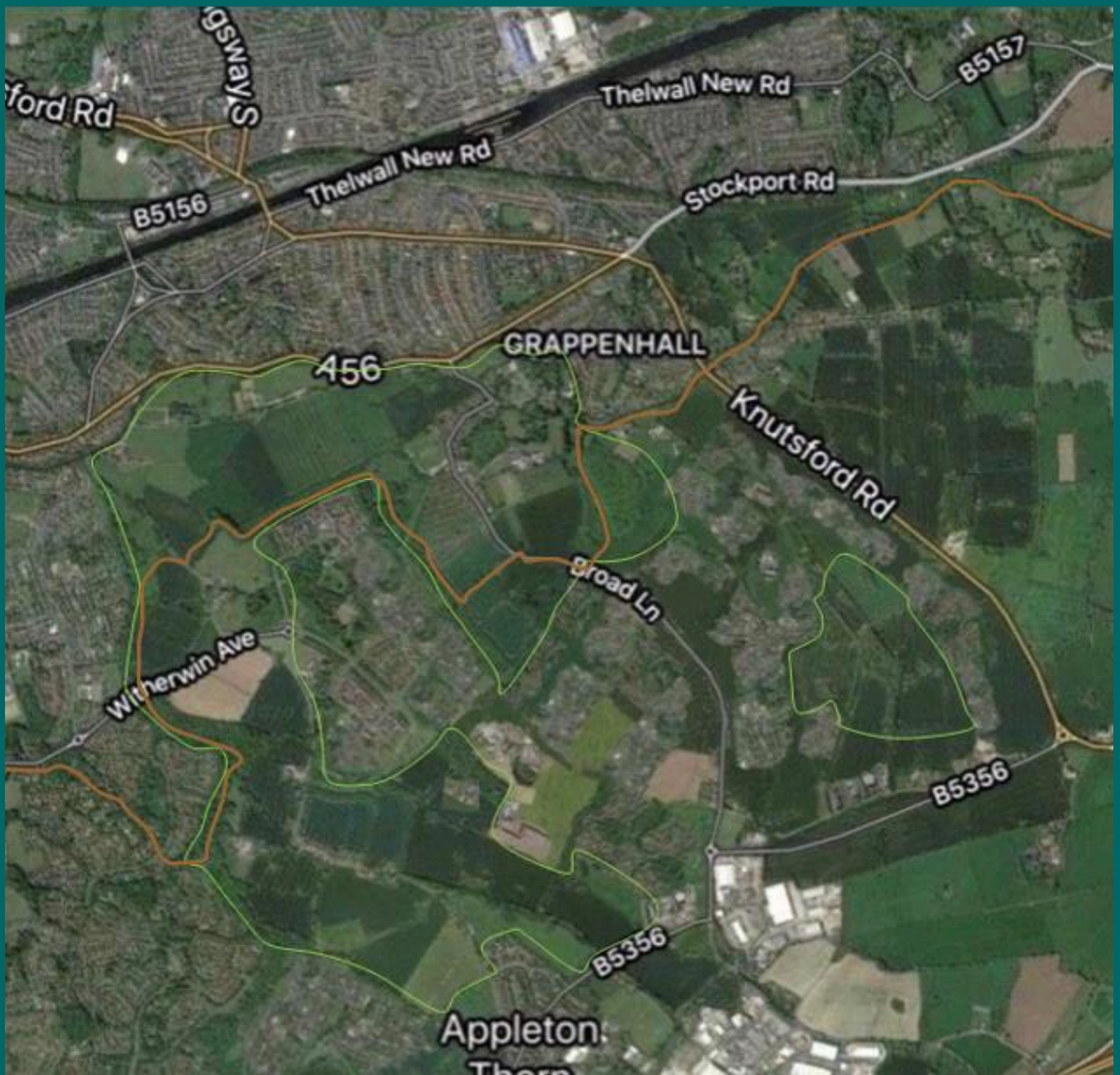
- Village centre
- Primary school
- High school
- Park
- Planted maze
- Skate park
- Community Hub / café
- Arts centre
- Medical centre
- Playing field / sports ground
- Outdoor recreation and scout / guide / ranger centre
- Allotments
- Convenience store
- Recycling centre
- New and existing public footpaths
- St Wilfred's Retirement Village

KEY

Landscape protected under the Proposed Modification / Alternative Plan:
Option 4



Option 4 with protected green space and biodiversity sites, The Mersey Valley
Timberland Trail and The Bridgewater Canal -with protected surrounding habitats,
breathable space and stunning landscape for new and existing settlements



2. South East Warrington Urban Extension

2.1 Environment, Ecology, Biodiversity

2.2 With regard to the proposed South East Warrington Urban Extension (SEWUE) we would respectfully submit that the PSV 2021 does not at present meet the test of "soundness" as set out in the National Planning Policy Framework (NPPF) 2021.

The test for soundness in the NPPF 2021 is set out as follows:

35. Plans are sound if they are:

a) Positively prepared – providing a strategy which as a minimum seeks to meet the area's objectively assessed means, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

b) Justified – **an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence**

c) Effective – deliverable over the plan period, and, based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidence by the statement of common ground and;

d) Consistent with national policy - **enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.**

2.3 The SEWUE plan does not meet the requirements of paragraphs 35 (b) and 35 (d) and therefore the PSV 2021 is unsound. Specifically, we consider that the proposed SEWUE in PSV 2021 is not an appropriate strategy, does not meaningfully take into account reasonable alternatives, and is not based on "proportionate" evidence. Further, we submit that the SEWUE plan does not facilitate truly sustainable development in accordance with the policies in the NPPF 2021 framework and other national planning policies.

2.4 Warrington Borough Council's stated "Objectives", "Strategies" and "Policies" contained in the PSV 2021 would not be met with the SEWUE plan.

2.5 The proposed site of the SEWUE directly impacts practically every single significant ecological and Local Wildlife Site in the South East Warrington area. This area is home to irreplaceable ancient woodland designated ASNW / LWS / SBI, other key woodlands, important Local Wildlife Sites (LWSs), key green infrastructure and land adjacent to key blue infrastructure and its surrounding natural habitat.

2.6 This includes the following:

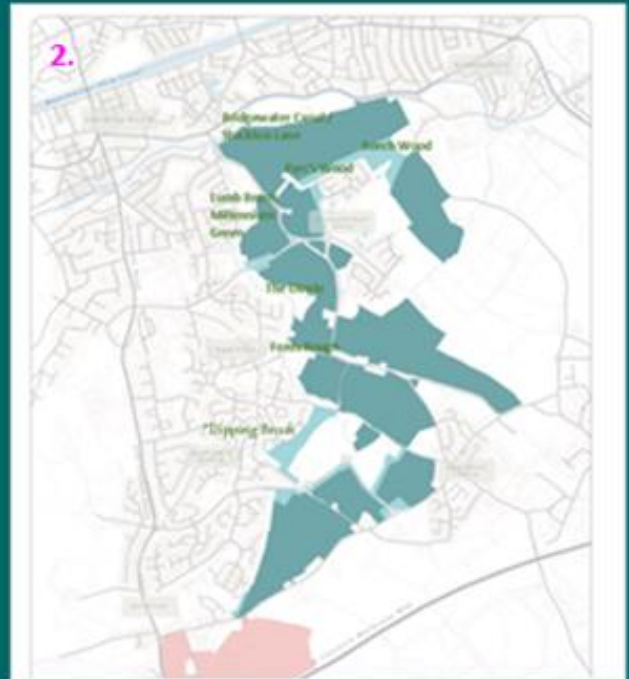
Ancient woodland: The Dingle (ASNW/LWS/SBI)
Ancient woodland: Fords Rough (ASNW/LWS/SBI)
Woodland: Parr's Wood (LWS/SBI_
Woodland: Beech Wood (LWS/SBI)
Lumb Brook Millennium Green
The Bridgewater Canal and its surrounding habitate
Woodland: Dipping Brook (*this is already subject to consented mass development on its remaining open side)
The Mersey Valley Timberland Trail
The Lumb Brook Millennium Green
Various marl ponds
Landscape between Parr's Wood and Stockton Lane providing supporting wildlife habitat, and sweeping vistas to the Bridgewater Canal and further north to St Elphin's Church

2.7 The PSV 2021 SEWUE does not meet or satisfy the criteria set out at paragraph 174 of the National Planning Policy Framework (NPPF) 2021. The specific provisions of the NPPF 2021 that are relevant to the proposed SEWUE are as follows:

174. 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);
- 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;
- 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**;
- e) **preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution** or land instability. **Development should, wherever possible, help to improve local environmental conditions such as air and water quality**, taking into account relevant information such as river basin management plans.

Location of proposed SEWUE



1. Aerial view of land proposed as South East Warrington Urban Extension showing key ancient woodland, local wildlife sites and key green infrastructure / ecological networks

2. Land ownership and location of proposed SEWUE with key ancient woodland, local wildlife site and key green infrastructure depicted in <https://www.warrington.gov.uk/sites/default/files/2021-09/south-east-warrington-urban-extension-a-deliverable-proposition-august-2021-1.pdf>

3. Proposed masterplan framework shown in <https://www.warrington.gov.uk/sites/default/files/2021-09/south-east-warrington-urban-extension-a-deliverable-proposition-august-2021-1.pdf>

2.8 The PSV 2021 SEWUE does not meet or satisfy the criteria set out in UK government guidance, "Ancient woodland, ancient trees and veteran trees: protecting them from development":

<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless:

- **there are wholly exceptional reasons**
- there's a suitable compensation strategy in place

Potential impacts

Development can affect ancient woodland, ancient and veteran trees, and the wildlife they support on the site or nearby. damaging or destroying all or part of them (including their soils, ground flora or fungi)

damaging roots and understorey (all the vegetation under the taller trees)

damaging or compacting soil around the tree roots

polluting the ground around them

changing the water table or drainage of woodland or individual trees

Nearby development can also have an indirect impact on ancient woodland or ancient and veteran trees and the species they support. These can include:

- breaking up or destroying connections between woodlands and ancient or veteran trees
- **reducing the amount of semi-natural habitats next to ancient woodland**
- **increasing the amount of pollution, including dust**
- **increasing disturbance to wildlife from additional traffic and visitors**
- **increasing light or air pollution**
- increasing damaging activities like fly-tipping and the impact of domestic pets
- **changing the landscape character of the area**

2.9 The PSV 2021 SEWUE ignores the potential impacts set out in guidance by The Woodland Trust in their report, "Impacts of nearby development on the ecology of ancient woodland":

<https://www.woodlandtrust.org.uk/media/45301/impacts-of-development-on-ancient-woodland.pdf>

Evidence indicates that **nearby development** may have substantial effects on ancient woodland associated with:

- housing development
- transport
- light pollution
- noise pollution
- commerce and industry
- energy
- waste disposal facilities
- cumulative development
- changes to the composition of woodland ground flora
- reduced tree health
- wildlife poisoning
- loss of soil micro-organisms, affecting nutrient cycling
- water management

Impacts from the construction process itself, including soil excavation and movement and associated construction materials dust include altered environmental conditions and modified hydrological processes.

Impacts arising from disturbance include:

- increased predation;
- reduced breeding success and population viability
- altered hydrological functioning or soil structure, leading to tree death
- changes in the composition of woodland vegetation

2.10 The PSV 2021 does not adhere to the criteria and guidance set out in the Forestry Commission's Ancient Woodland Assessment guidance, as referred to in the UK government guidance, "Ancient woodland, ancient trees and veteran trees: protecting them from development":

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740503/FCNE_AWSA_AssessmentGuideFinalSept2018.pdf

Is the site of the ancient woodland the only possible place for this proposal?

Does it have to be on the ancient woodland site (i.e. is it location dependent) or can it go anywhere else?

Does the development have the potential to affect the woodland through changes to air quality or to ground water (through pollutants or changes in hydrology)?

Has an assessment been carried out and appropriate mitigation proposed? Impacts from air and water pollution and hydrological changes have the potential to occur at significant distances from the source.

Consider a Hydrological Impact Assessment to assess any change in hydrology (quality and quantity of water) and any potential effects. This is of particular importance to ancient gill woodlands as they often contain important communities of lower plants (mosses, liverworts, and lichens). Is there a need for a tailored assessment of pollutants on industrial developments?

What is the current function, and planned function, of the land to be lost to development? Consider a full assessment of the land to be lost for its function in enhancing and or supporting the adjacent ancient woodland. For example, is the proposal located in a network of ancient woodland blocks? Could the development have a knock-on effect on a number of areas of ancient woodland? The application site could include areas of scrub and grassland which contribute to supporting species within the ancient woodland and thus contribute to its biodiversity.

2.11 The PSV 2021, SEWUE proposal and evidence base **does not include an impact assessment with regards to the ancient woodland at risk of harm** as a result of this proposed development forming the SEWUE, as recommended by the Forestry Commission, above. The [Habitat Regulations Assessment](#) that forms part of WBC's PSV 2021 evidence base relates only to the impact the development may have on specific listed sites, classified as the National Site Network, also known as European Sites, that are located within influence of Warrington Borough, namely;

- Manchester Mosses Special Area of Conservation SAC, consisting of:
 - Risley Moss Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR)
 - Holcroft Moss SSSI
 - Astley and Bedford Mosses SSSI
 - Rixton Clay Pits SAC
 - Rosterne Mere Ramsar site
 - Mersey Estuary SPA and Ramsar site
 - Midland Mere and Mosses – Phase 1 and 2 Ramsar site
 - West Midlands Mosses SAC

2.12 Where there *is* passing reference to development, the PSV 2021 SEWUE and the Sustainability Assessment relies on mitigation measures, as do The Mersey Forest policies applicable to ancient woodland in Warrington, specifically:

PSV 2021

“Where a loss of, or negative impact on green infrastructure functionality or ecological system/network is unavoidable, development proposals should demonstrate what mitigation measures are proposed and/or replacement green infrastructure will be provided. Any replacement or mitigation measure should seek to secure a net gain in biodiversity assessed against the latest version of the DEFRA Metric and be deployed as closely as possible to the affected green infrastructure asset.” (p124)

Homes England: South East Warrington Urban Extension – A Deliverable Proposition

https://www.warrington.gov.uk/sites/default/files/2021-09/south_east_warrington_urban_extension_-_a_deliverable_proposition_-_august_2021_1.pdf

“There are also significant opportunities for biodiversity enhancement through reinforcing the wildlife corridors along Dingle Brook”

The Mersey Forest

https://www.merseyforest.org.uk/LA_policies_final_web.pdf

“Buffer ancient semi-natural woodlands at The Dingle...by tree planting.”

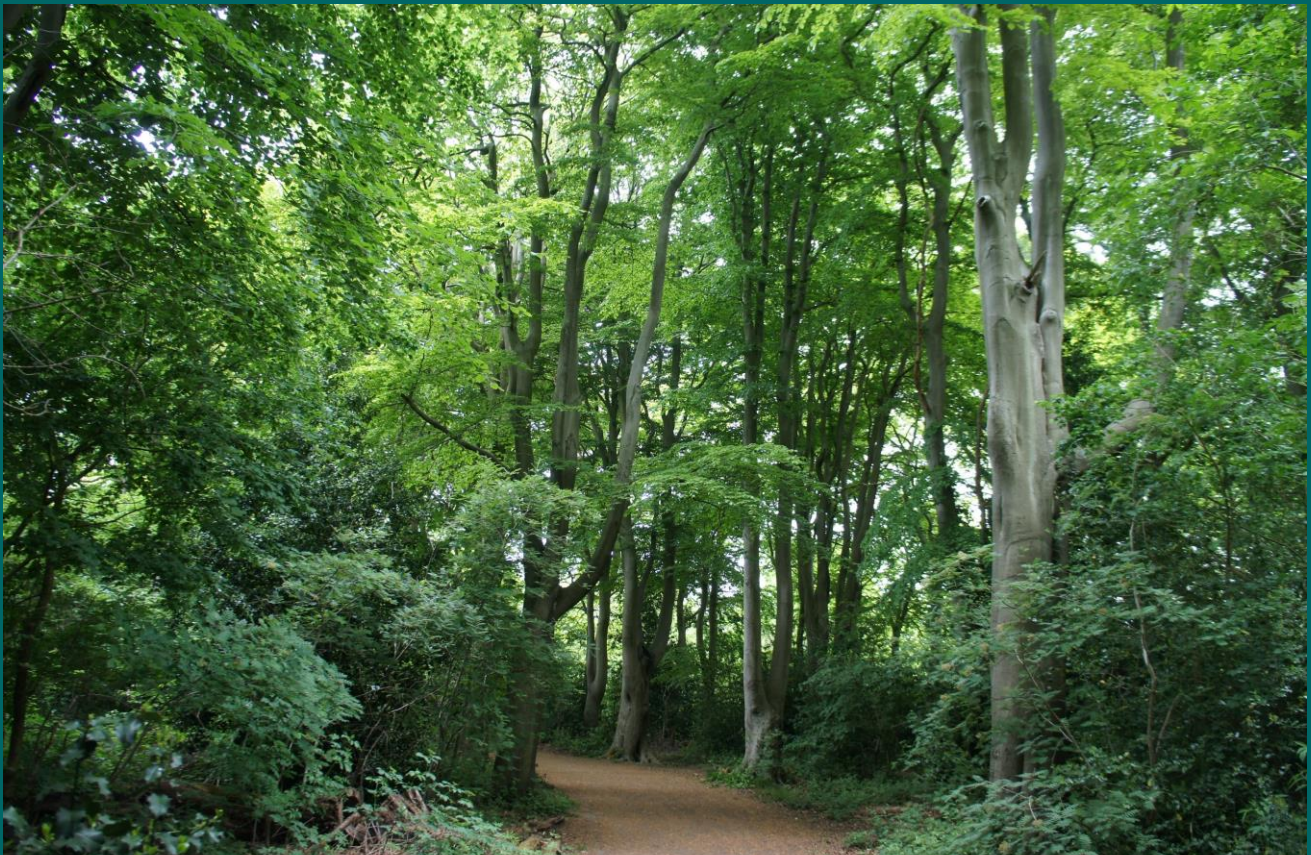
2.13 Not only are these measures inadequate and do not meet the criteria set out in the NPPF 2021, the UK government guidance on ancient woodland, the guidance set out by The Woodland Trust and the guidance set out by The Forestry Commission, we would respectfully submit that the reliance by WBC on mitigation measures in their PSV 2021 as a way of “enhancing biodiversity” when it comes to ancient woodland is in any event is contrary to guidance issued by the UK government in “Ancient woodland, ancient trees and veteran trees: protecting them from development”: where it specifically states.

“Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.”

2.14 We would therefore submit that reliance on mitigation measures when contemplating development adjacent to ancient woodland is flawed, particularly if it is to be used in the PSV as evidence of “enhancing green infrastructure and biodiversity” or worse, as a marketing tool for housing developers.

2.15 We would also submit that the proposed location of the SEWUE does not meet the requirements of the NPPF 2021 in terms of “**protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils**” and in particular in terms of “**preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution**” because the SEWUE’s proximity to so many sites designated LWS/ SBI/ASNW (that

have already been burdened on one side by mass housing development) means that these “sites of biodiversity” are inevitably going to be put at unacceptable risk of irreparable harm.



Proposed site of SEWUE development: Parr’s Wood, LWS and key part of South East Warrington ecological network, The Timberland Trail



Proposed site of SEWUE development: View from Lumb Brook Valley towards town centre

Key Ecological networks and Local Wildlife Sites directly impacted by SEWUE



How the Proposed SEWUE development will look

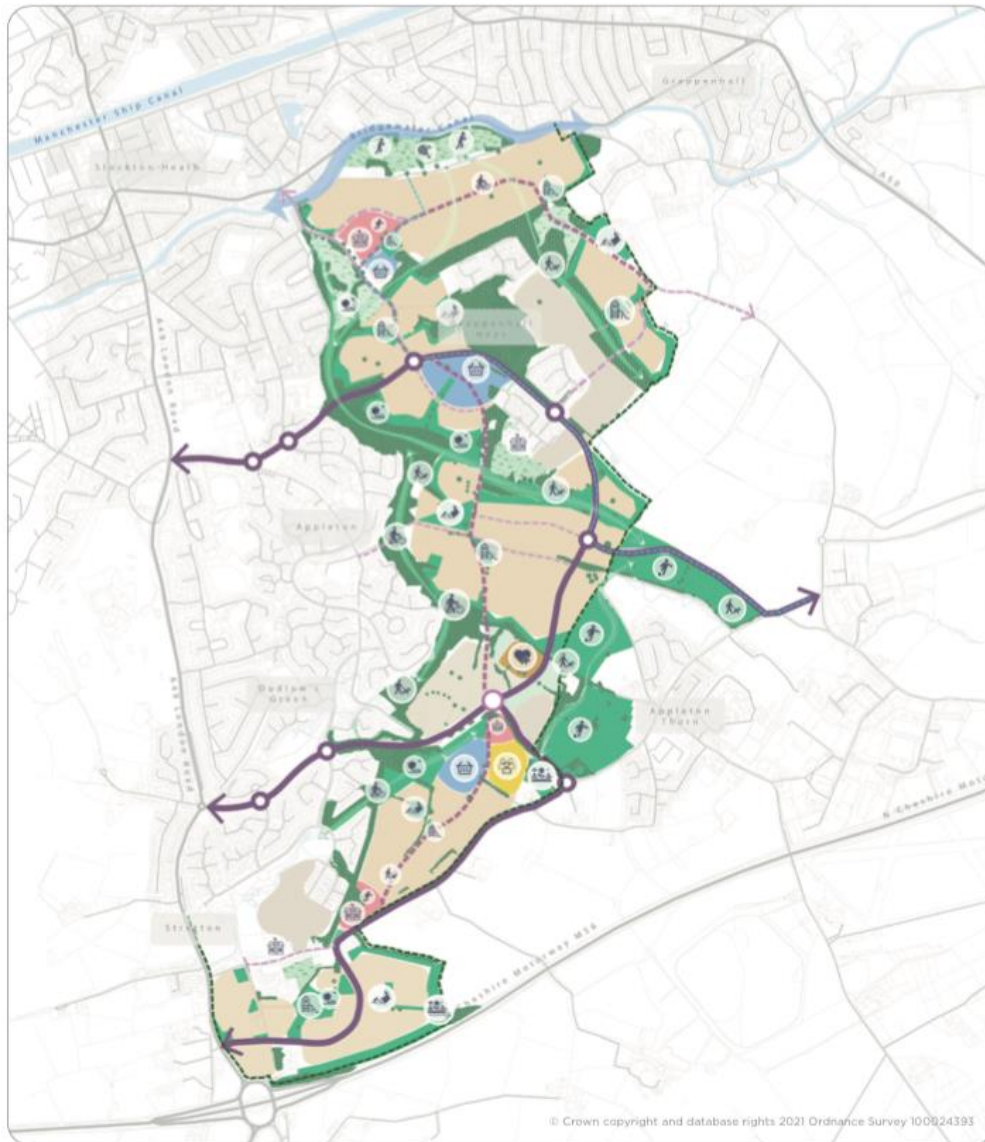















Figure 3. Indicative Masterplan Framework

	Established Tree Groups		Indicative Strategic Highway Network
	Existing Open Space		Indicative Mass Transit Safeguarded Corridor
	Indicative Green Infrastructure		Indicative Low Traffic Community Connector
	Indicative Residential Development		Local Links
	Indicative Local Centres		Green Links (to include active travel)
	Indicative Education		Consented Development Schemes
	Indicative Healthcare		Existing Connection Along Bridgewater Canal
	Indicative Community Hub		Revised Green Belt Boundary

The site of the proposed SEWUE in more detail: The Lumb Brook Valley

2.16 Comprising ancient woodlands, The Dingle, Fords Rough, Lumb Brook itself and in terms of setting and landscape, encompassing the Millennium Green and reaching east across Lumb Brook Road to Parr's Wood, Beech Wood and south to Doods Lane, Appleton and Wrights Green. The area has brooks, streams, ponds, farms, horses, cattle and vibrant green and yellow fields that stretch as far as the eye can see. It has hedgerows, plants, flowers, and miles of pathways that take one away from the noise of traffic and everyday life. Reported are over thirty species of birds, including woodpeckers, nuthatches and warblers, various species of bat, foxes and butterflies.

2.17 The ponds, brooks and other water habitats provide a home for a variety of wildlife that you may not see elsewhere. It gifts views of a picturesque countryside sloping gently northwards towards a distant St Elphin's Spire, sufficiently close to connect our rural life with our town. But most importantly, and beautifully, it is home to magnificent ancient woodland areas along with younger woods, a pine wood, a covert and a beautiful shelter belt of trees.

2.17 The Lumb Brook Valley has been listed as one of the top ten woodland areas in the UK in the [BBC's Wildlife](#) magazine, [The Independent](#), [Wanderlust.co.uk](#), [LandLove.com](#) and others.

2.18 The Woodland Trust [describes](#) it as "*a delightful site with several distinctive woodland areas*".

The area is referenced in a book, *50 Gems of Cheshire: The History and Heritage of the Most Iconic Places* by Mike Appleton. He writes,

"Sometimes gems appear by word of mouth, recommendation or just pure luck. After researching autumnal places to visit, up popped an article from Wanderlust about great regions to visit as the leaves turn. Its article "Go for gold: Where to see Britain's best autumn colours" listed eight spots and Lumb Brook was one of them.

According to Cheshire Wildlife Trust, the Forestry Commission and The Woodland Trust, Cheshire is one of the least wooded counties in England with less than 5% woodland cover.

The Woodland Trust reports that *"Lumb Brook Valley is designated as Ancient Semi-Natural Woodland (ASNW), which comprises less than 2% of land cover in the UK. Therefore, this area of ASNW provides local people a unique opportunity with a **very rare habitat**. It also provides an ecologically rich habitat in an increasingly urbanised area and is designated as a Local Wildlife Site."*

2.19 The Woodland Trust say the following in their Woodland Management Plan:

*"Lumb Brook Valley is approximately three miles to the south-east of Warrington in the suburb of Appleton. It lies in the Green Belt on the edge of the urban fringe, however **the area is under intense pressure for future housing development**. The wood is a prominent feature*

in the landscape and forms a green corridor within the local area connecting with other green spaces including Lumb Brook Millennium Green and Dipping Brook valley.

It is a linear woodland running roughly north to south on the steep sided slopes of Dingle Brook and Doods Brook. It is bordered by housing to the west and south and farmland to the east and north. There are a number of sandstone outcrops that are exposed along the valley. The woodland is designated as Ancient Semi-Natural Woodland (ASNW) and a Local Wildlife Site (LWS) and is dominated by oak, ash, cherry with sycamore, beech and alder. The wood is approximately 11ha and comprises four distinctive woodland compartments."

The woodland is relatively small, narrow and vulnerable to external development pressures. The plateau area to the west has been developed for housing resulting in changes to the drainage into the woodland...Future housing development pressure is great in this area and input into any future planning applications on adjoining land will be required where possible to reduce the impacts of developments.

Housing estates abut the western boundary of the wood with farmland alongside the eastern boundary."

The Dingle

2.20 The Woodland Trust says in their Woodland Management Plan of The Dingle;

"This area consists of a large wooded area alongside the Dingle Brook and is designated as ASNW. The southern end of the wood owned by Warrington Borough Council. Housing estates abut the western boundary of the wood with farmland alongside the eastern boundary. In the northern sub compartment a small woodland extension has been planted in 1998. The remaining mature sections of the woodland contain oak, silver birch, sycamore, Scots pine and beech. In addition, extensive edge and under planting has taken place during the early 1980's (by Warrington Development Corporation). This takes the form of dense plantings of ash, rowan, wild cherry, field maple, birch, willow, alder, oak, beech, hazel, blackthorn and hawthorn."

Fords Rough

2.21 The Woodland Trust says the following about Fords Rough:

"This section of Lumb Brook Valley is alongside Doods Brook and contains the most significant section ASNW. The woodland consists of mature and semi-mature oak, ash, sycamore, wild cherry, alder with rowan and birch. The understory is more diverse than elsewhere in the valley with natural regeneration of cherry, sycamore, ash and oak. Most of the understory has been extensively restocked by Warrington Development Corporation in the late 1970's and early 1980's. The shrub layer is reasonably well developed and contains holly, hazel, hawthorn with elder. The ground flora is also reasonably diverse and consists of wood anemone, bluebell, lesser celandine, with a range of mosses/ liverworts and ferns also present.

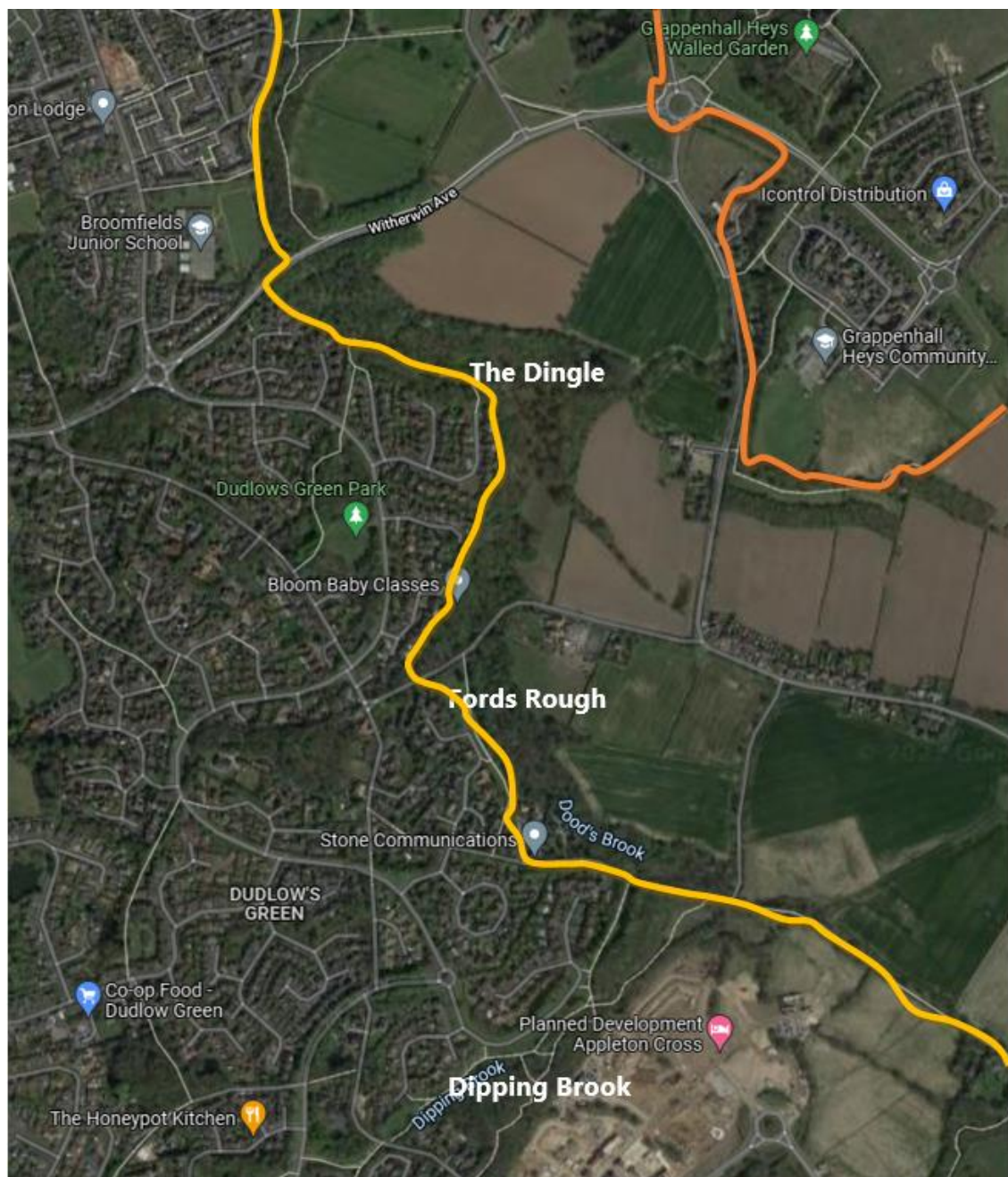
Some small sections of this woodland were sold to neighbouring property owners in the 1980s. This has caused further fragmentation and habitat loss."



Ancient woodland, LWS/SBI The Dingle and Fords Rough, Lumb Brook Valley

The Specific Risks to The Dingle and Fords Rough (ASNW/LWS/SBI)

2.22 The PSV 2021 proposed SEWUE involves development on large parcels of land directly next to these ancient woodlands. That will mean the woodlands are blocked in on all sides by mass housing developments, effectively cutting them off from their supporting habitat. If you were to take a walk through these woodlands you would notice that one side of the woods was open countryside, but the other side of the woods is lined with housing estates, as depicted by the **yellow line**. This double sided encroachment has already begun with the development of mass housing at Dipping Brook, as can be seen on the map below. The **orange line** depicts current and consented development at Grappenhall Heys. **The land between the yellow and orange lines would be filled with development if the current SEWUE proceeds.**



2.23 If the proposed SEWUE proceeds in its current form, there will be mass development on the remaining open sides of The Dingle and Fords Rough, not only destroying these sites' sense of openness and sense of place in their surroundings, and not only degrading their visual impact and amenity as locally accessible wildlife sites in a natural environment, but most significantly, putting these vitally important ASNW/LWS/SBI habitats at risk.

Similar example of non buffered, fragmented woodland as a result of development directly adjacent to woodland, as has already happened along one side of ASNW The Dingle.

<https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>



Fragmented woodland with unbuffered development at Pencoedre Wood, Vale of Glamorgan.

Guiding principles

The following three principles have been compiled from The Standing Advice and professional good practice, and should guide both site selection and the subsequent design of development.

PRINCIPLE 1: Avoid harm – can the proposed development go elsewhere?

Development should be designed to avoid the loss of, or in the case of adjacent development, detrimental impact on, ancient woodland, wood pastures, historic parkland and ancient or veteran trees.

Government policy on ancient woodland (*Keepers of Time, 2005* and re-endorsed in 2013)⁹ states:

“The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland.”

The Standing Advice instructs LPAs to use the Assessment Guide¹⁰, published by Natural England and the Forestry Commission. The first question planning authorities are asked to consider is:

“Is the site of the ancient woodland the only possible place for this proposal? Does it have to be on the ancient woodland site (i.e. is it location dependent) or can it go anywhere else?”

⁹ <https://www.broadland.gov.uk/Documents/planning/strategy/10120Adoption/Adopted120con120strategy/Section1205.4120-120Environment.pdf>

¹⁰ Forestry Commission & Natural England. (2015). Ancient Woodland and Veteran Trees: Assessment Guide to potential impacts in relation to planning decisions. Available at: [www.forestry.gov.uk/pdf/150330AWAssessmentGuide2.pdf/\\$FILE/150330AWAssessmentGuide2.pdf](http://www.forestry.gov.uk/pdf/150330AWAssessmentGuide2.pdf/$FILE/150330AWAssessmentGuide2.pdf)



Ancient woodland with unbuffered development at The Dingle, with development on the other side proposed (buffer or no buffer)

2.24 The notion of planning housing development directly adjacent to ancient woodlands is an outdated concept that may have been attractive as a marketing tool in the 1980s – hence the mass development at Dudlows Green and Appleton that literally encroaches on the edge of these ancient woodlands and has concrete pathways from the housing estates into the woodland. But we are now in the 21st century with a climate emergency and, it is hoped, a better informed environmental awareness. We appreciate now that these ancient woodlands are unique habitats that have been established organically over hundreds of years and as such are “irreplaceable” – which means that they cannot be recreated ([The Woodland Trust ref Defra 2007](#); [Forestry Commission/Defra 2005](#); [Kirby & Goldberg 2002](#); [Land Use Consultants 2001](#); [Thomas et al. 1997](#); [Woodland Trust 2002a](#)). To propose mass development next to these sites – which includes housing and commercial buildings is, we would submit, a regressive step and one which is more reminiscent of the mid to late twentieth century when we failed to appreciate the importance of preserving such areas of natural beauty and biodiversity.

2.25 What are specific risks to development that is next to or near ancient woodland? With development already right next to The Dingle and Fords Rough the SEWUE in its current form proceed, these ancient woodlands will be choked by urban development, even if a buffer on the remaining open side is proposed.

2.26 By building at the planned sites the woods will be starved of open countryside and the habitat that supports them.

2.27 More than 1,000 irreplaceable ancient woods have been threatened by development in the UK over the last ten years – this doesn’t necessarily mean that the trees will be felled and bulldozed over, but that the **threat of chemical pollution, disturbance from machinery, fragmentation as the result of the destruction of adjacent semi-natural habitats, the**

introduction of non-native plants, the reduction of natural side light, change in soil and hydrology, noise pollution that will drive away the wildlife, car fumes, brick and cement dust, food reduction from nearby fields and hedgerows and the overall traumatic effect of building mass housing estates on a fragile ecosystem is potentially devastating. We would submit that development at the site of the proposed SEWUE will place these ancient woodlands unnecessarily at risk of irreparable harm.

2.28 Much of the woodland in the Lumb Brook Valley has been there for hundreds of years – and it has perhaps thrived for this long because it has been allowed to breathe and grow in its open, natural surroundings. The lush farmland and fields of Lumb Brook Valley form part of its habitat and supports life in the woods – so to plan to cover the area with housing estates that will suffocate the woodlands on all sides; boxing them in to a tight corridor and choking it with urban development seems like desecration; it is illogical. Irresponsible.

2.29 Trees and woodland are essential for our environment and to help fight climate change.

2.30 As per The Woodland Trust, *"Trees are the ultimate carbon capture and storage machines. Like great carbon sinks, woods and forests absorb atmospheric carbon and lock it up for centuries. They do this through photosynthesis. The entire woodland ecosystem plays a huge role in locking up carbon, including the living wood, roots, leaves, deadwood, surrounding soils and its associated vegetation. 400+ tonnes carbon per hectare is how much a young wood with mixed native species can lock up in trees, roots and soil. And trees do more than just capture carbon. They also fight the cruel effects of a changing climate. They can help prevent flooding, reduce city temperature, reduce pollution and keep soil nutrient-rich.*

Land currently acting as buffer protecting **ASNW The Dingle**: proposed SEWUE development sites



mass development at these woodland sites at the same location as that which is proposed by the PSV 2021 SEWUE. The Trust writes,

"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. As such, the following Planning Policy applies: National Planning Policy Framework, Paragraph 118, states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Natural England's standing advice for Ancient Woodland and Veteran Trees states: "Trees and woodland classed as 'ancient' or 'veteran' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes."

*The close proximity of a large residential development to our site could have numerous adverse impacts on the health of our sites. 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."

2.32 Given the plans for SEWUE in the PSV 2021, the advice from The Woodland Trust has not been followed.

2.33 We would also like to refer back to the UK Government guidance “Ancient woodland, ancient trees and veteran trees: protecting them from development”: being

“You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless:

- **there are wholly exceptional reasons**
- there’s a suitable compensation strategy in place

Nearby development can also have an indirect impact on ancient woodland or ancient and veteran trees and the species they support. These can include:

- breaking up or destroying connections between woodlands and ancient or veteran trees
- **reducing the amount of semi--natural habitats next to ancient woodland**
- **increasing the amount of pollution, including dust**
- **increasing disturbance to wildlife from additional traffic and visitors**
- **increasing light or air pollution**
- increasing damaging activities like fly--tipping and the impact of domestic pets
- **changing the landscape character of the area”**

2.34 On the balance of probabilities, i.e. more likely than not, mass development adjacent to the site of these ancient woodlands would result in the deterioration of these ancient woodlands, particularly given the size and extent of the proposed development, the amount of construction work that will be required in such development, the chemical pollution and soil disturbance from such development construction, the noise pollution from such development construction, soil disturbance as a result of mass housing and commercial developments, light pollution as a result of mass housing and commercial developments, noise pollution as a result of mass housing and commercial developments and by the very nature of the development proposed, would reduce the amount of semi natural habitats next to these ancient woodlands.

2.35 We would also like to refer back to The Forestry Commission’s guidance, being;

“Is the **site of the ancient woodland the only possible place** for this proposal?

Does it have to be on the ancient woodland site (i.e. is it location dependent) or can it go anywhere else?

Does the development have the potential to affect the woodland through changes to air quality or to ground water (through pollutants or changes in hydrology)?

Has an assessment been carried out and appropriate mitigation proposed? Impacts from air and water pollution and hydrological changes have the potential to occur at significant distances from the source.”

2.36 We are not aware of any assessment having been carried out at the site of these ancient woodlands. We note that Natural England also [raised queries](#) about the existence of a WBC policy for ancient woodland in response to the proposed PSV 2019. There are other sites available for development in the area.

Buffer zones

2.37 There is much discussion about “buffer zones” when it comes to wanting to develop at or near ancient woodland, or indeed other woodlands. There have been recent amendments to the Environment Bill passed by the House of Lords regarding the minimum distance there should be between ancient woodland and development:

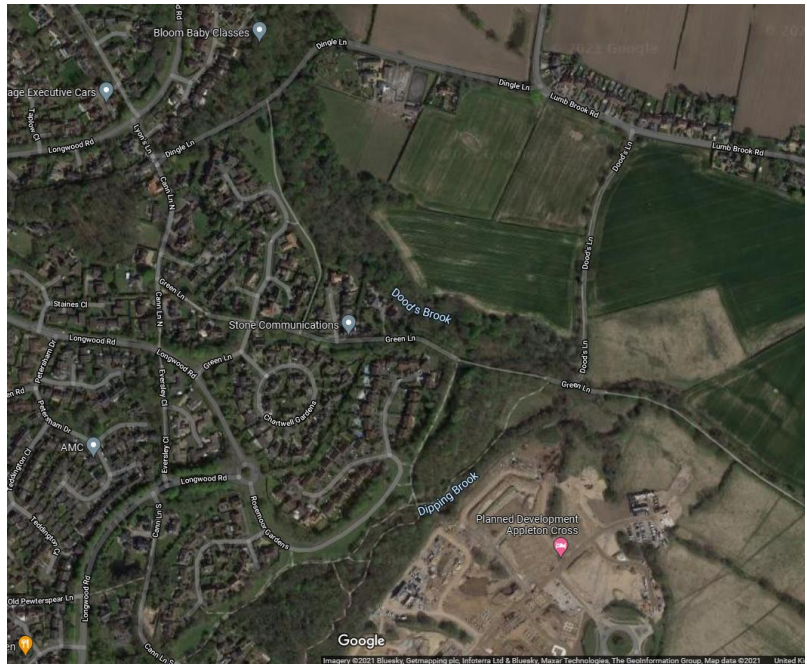
Duty to implement an enhanced protection standard for ancient woodland in England

*(b) any development adjacent to ancient woodland must incorporate a minimum **50-metre buffer** to provide protection, reduce indirect damage and provide space for natural regeneration,*

2.38 The Woodland Trust, in its addendum report on Impacts of Development on Ancient Woodland says the following: <https://www.woodlandtrust.org.uk/media/45302/impacts-of-development-on-ancient-woodland-addendu.pdf>

“To ensure that ancient woodland is protected and enhanced it is vital to have a good understanding of what is valuable in the landscape, not just the woodland in question BEFORE any development takes place. The presence of individual scattered trees within a landscape may provide important habitat for woodland birds (Stagoll et al. 2010) and so should be preserved. Furthermore, active management of these scattered trees within a landscape could help to improve connectivity and function of any surrounding woodland areas. Merckx et al. (2007) identified hedgerows and copses with tall trees within the landscape matrix as being important markers for butterflies to find their way from one suitable habitat to another.

If disturbance of ancient woodland is to take place then it is vital that the ecology of the wood is well documented and understood before the disturbance takes place. The connection between that woodland and other woods or remnants of woods in the area also needs to be understood as connectivity between patches of woodland is important for promoting species diversity within a landscape. Structural complexity of both the interior of the wood and the woodland edges should also be ensured to maintain habitat quality. Any restoration of woodland patches should be spatially targeted to ensure maximum success. Many papers suggest the planting of buffer zones to protect core woodland habitat from the impact of development, but very few give figures for the **size of buffer zones and those that do range in size from 50m to 400m.**”



Ancient woodland with unbuffered development at **ASNW Fords Rough**, with development on the other side proposed (buffer or no buffer).

Also showing consented development underway directly adjacent to the remaining open side of Dipping Brook.

Land currently acting as buffer protecting **ASNW Fords Rough**: proposed SEWUE development sites



Parr's Wood and Beech Wood at Grappenhall Heys

2.39 The Woodland Trust says the following in their Woodland Management Plan for Grappenhall Heys:

Parr's Wood

2.40 "[Parr's Wood] runs east/west and consists of pine (Corsican/Scots) along with occasional oak, beech, and horse chestnut. The belt is narrow (15m in parts) **and has a prominent position in the landscape.** There is a small seasonal pond located in a spur close to the western entrance. The belt has been extensively under planted in the late 1980s with a wide range of mixed broadleaved species (oak, rowan, hazel and cherry). Much of this under planting has been suppressed by the closed canopy. **However, there is a significant amount of side light** that has allowed it to establish particularly along the woodland edge."

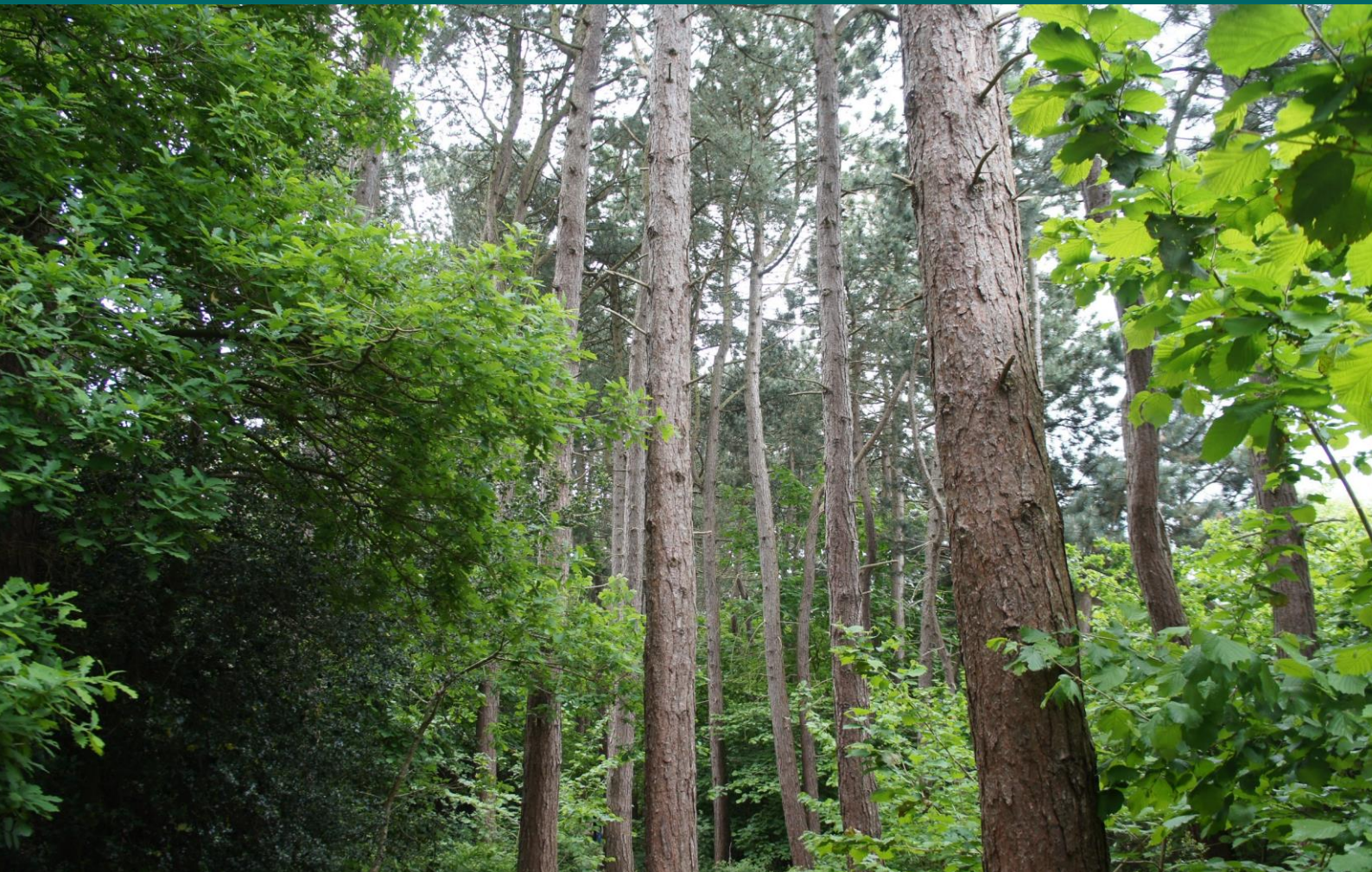
Beech Wood

2.41 This lies to the east of the Shelter Belt. It contains mature and over mature beech with occasional horse chestnut, pedunculate oak, birch, pine, large leaved lime with some under planted hazel, hawthorn, and rowan. There is a linear footpath running through the compartment which is part of the Mersey Valley Timberland Trail long distance footpath. There is also a small balancing pond nearby that is used to regulate storm water flow from **the new housing development next to the site. Finally, there is a small season pool to the west of the main pond. This appears to dry out completely in the summer and is useful addition to the wetland mosaic. The woodlands have open access for the public and are well used by local people, particularly for dog walking.**

2.42 While Parr's Wood and Beech wood are not ASNW, they are LWS, and the Landscape Character assessment that formed part of the PDO 2017 says of woodland,

"All the woodlands however are extremely important as wildlife habitats. Lowland mixed broadleaved woodlands are important for a wide range of birds, mammals and invertebrate species, such as blackcap, willow warbler, chiffchaff, great tit, marsh tit, tree creeper, nuthatch, spotted flycatcher, sparrowhawk, tawny owl, great spotted woodpecker and green woodpecker (all UK Species of Conservation Concern). Mammals of interest include badger, grey squirrel and wood mouse."

2.43 Parr's Wood and Beech Wood also form part of [The Mersey Valley Timberland Trail](#), which is detailed later on in this document.



2.44 Like The Dingle and Fords Rough, these woodlands are notionally in a semi rural setting, but which have, or are in the processing of having, mass housing development on one side. While one side of these woodlands gives way to open countryside, sweeping views north across stunning agricultural landscape towards the Bridgewater Canal and further in the distance, St Elphin's spire, and at the westerly point, attractive farmland and farm animals, the other side has been encroached upon by housing forming part of the Grappenhall Heys development. Further housing is underway or is shortly to be underway at sites developed by Rowland Homes and Urban Splash, the latter of which will also be adjacent to a further woodland site that includes a marl pond wildlife site.



Housing directly adjacent to Parris Wood, visible through the woodland on one side.

2.45 The proposed SEWUE will involve housing development and public / retail buildings directly adjacent to the remaining open sides of these woodlands. This will suffocate these Local Wildlife Sites, both literally and metaphorically. **These woodlands will be turned** from lovely, well used, natural wildlife habitats with at least to one side a sense of openness and countryside, **into essentially a path through a housing estate.**

2.46 The views to the north, across stunning landscape to the Bridgewater Canal, both through the trees and from Lumb Brook Road will be severely blighted by the proposed "Lumb Brook Green" housing development and public / retail development between Parrs Wood and Stockton Lane, next to the Bridgewater Canal.

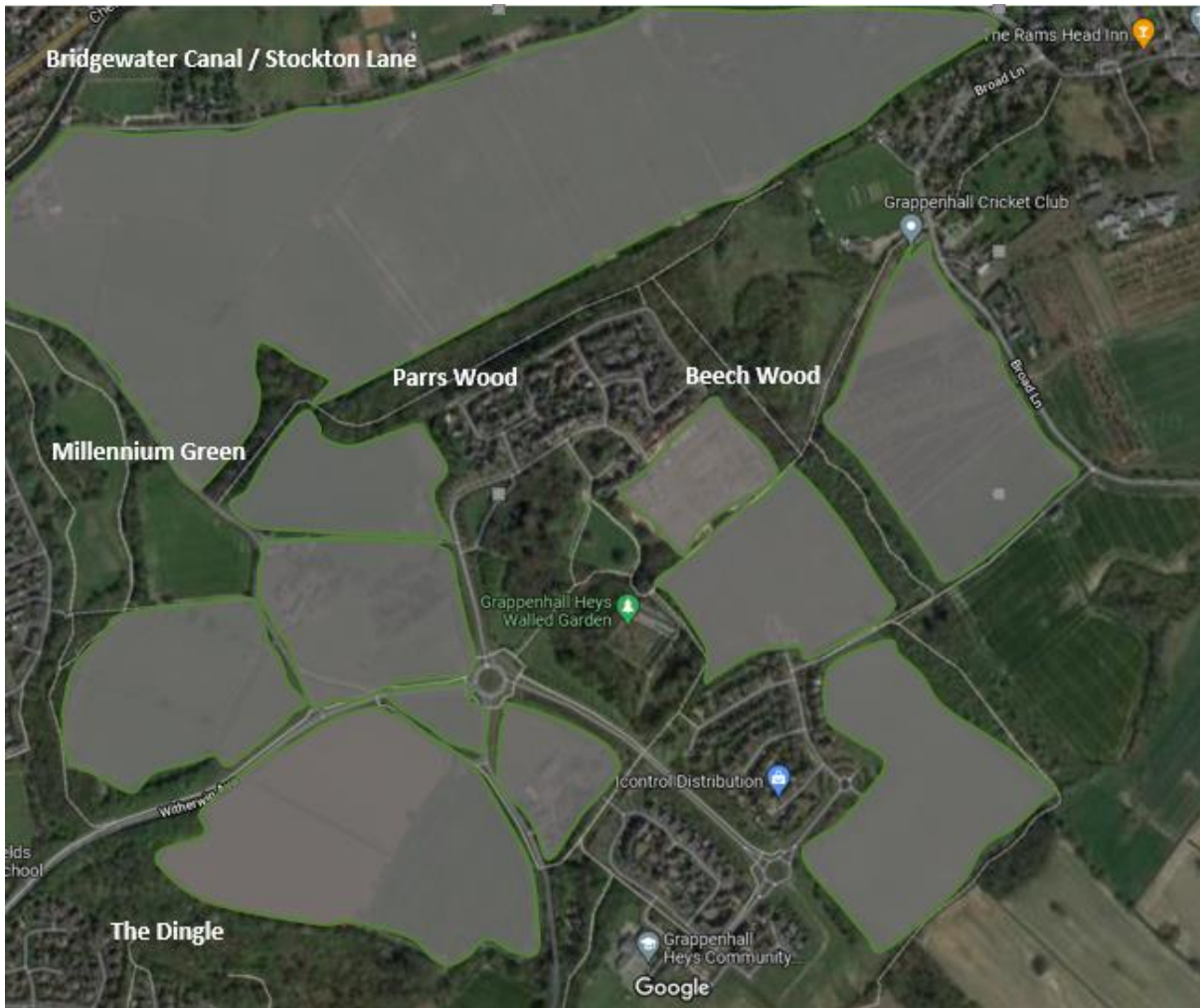
2.47 Although not ASNW, these woodlands also support wildlife, are classed as LWS and will interact with their surrounding natural habitat, and are at the same risk of harm should development engulf them on all sides. And it isn't just the environmental impact of allowing mass housing to be built on these sites, it's the destruction of the sense of openness and the loss of the nature and character of the landscape. There is a significant psychological difference between walking through a curated passage of trees blocked on all sides by mass housing estates and walking through woodlands in a beautiful countryside setting.

2.48 As per above, a letter from The Woodland Trust dated 29 September 2017 to Warrington Borough Council sets out their response to the Preferred Development Option (PDO), which proposed mass development at these woodland sites at the same location as that which is proposed by the PSV 2021 SEWUE. The Trust writes,

"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.

The close proximity of a large residential development to our site could have numerous adverse impacts on the health of our sites. 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.



Impact on sense of openness and countryside on woodland already burdened by development on one side, on the basis of the current SEWUE.

2.49 Parr's Wood has already been encroached upon, with housing at Grappenhall Heys built right up alongside the southern side of the woodland, causing a visual "bleeding" of urban housing into the woodland from its pathways, pollution including light pollution, car use, and a loss of the sense of openness one would hope and expect to find in a location of this nature. To propose mass housing development along the remaining south edge and on the other, northern side of Parr's Wood would box in the woodland entirely, suffocating it. Its access to light would be affected, there is a danger of permanent damage to the trees, settled wildlife there would be disrupted and the development would have a detrimental effect on the visual amenity of the area.

Land adjacent to Grappenhall Heys / Parrs Wood and Beech Wood; sites for development in the SEWUE plan



Lumb Brook Millennium Green

2.50 The Lumb Brook Millennium Green is an open space of 13.2 acres with 1.5km of pathway. The Lumb Brook Millennium Green is designed to be and stay forever as a natural open space for the benefit of the inhabitants of Cobb's Estate, whilst also being open to the wider community.

2.51 It was created in 2000 as a "Millennium Greens" project, an initiative of the Countryside Agency (now Natural England) and funded by The Millennium Commission. (The Millennium Commission was wound up on 30th November 2006).

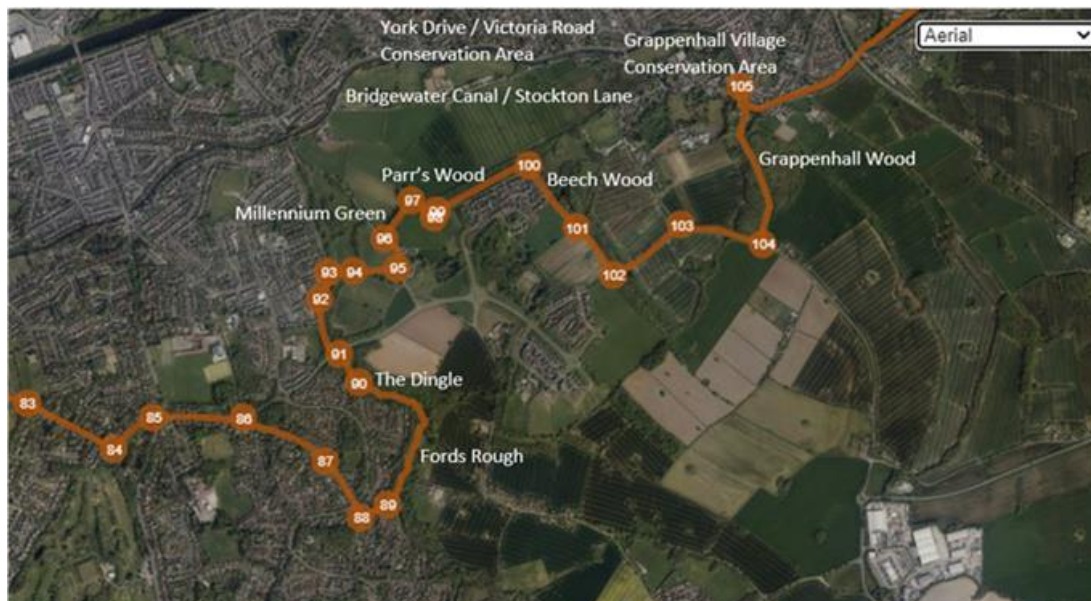
2.52 Under the proposed SEWUE, the Millennium Green will have development on fields adjacent to it, to the south. It already has a road on one edge and Cobbs Estate on the other.

2.53 Further development next to this site will risk harm to the woodland that forms part of the Green and its surrounding habitat. The landscape on the open side of Millennium Green offers stunning views north to Warrington and West and South West to the ancient woodlands of The Dingle.



Lumb Brook Millennium Green

The Mersey Valley Timberland Trail



2.54 The Mersey Valley Timberland Trail is a wonderful walk that 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 described above, waters including The Bridgewater Canal and surrounding wildlife habitats. Its path is 22 miles in length and is an excellent example of how we can connect with nearby communities through a shared appreciation of our natural green infrastructure.

2.55 This Trail allows you to take an interesting and woodland rich walk from Runcorn then Daresbury, through South Warrington via Walton, Appleton, Grappenhall, Thelwall and then on to Lymm. More information about The Timberland Trail, including detailed maps and directions for the entirety of the 22 miles long path can be found here

<https://www.merseyforest.org.uk/files/routes/10/1/Mersey-Valley-Timberland-Trail.pdf>

2.56 It offers opportunities for active travel, general exercise and rest stops in a variety of natural spaces. This vital ecological network should be protected from unnecessary encroachment from development - and the consequential pollution and disruption to vital flora and fauna this would bring.

2.57 As The Timberland Trail incorporates The Woodland Trust woodland, they specifically objected to this woodland being incorporated into Warrington Borough Council's "strategic green space" as part of development in response to the PDO 2017 / PSV 2019:

"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."

2.58 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.

2.59 Natural Green Infrastructure benefits from open space as part of its network. This is a section of The Timberland Trail that has significant natural open green space. To engulf it in mass development degrades this green network, and deprives those using the urban sections of this GI to access open countryside further along its route of 'reward space' - areas of respite from the urban environment, offering cleaner, fresher air, a sense of openness and being in the countryside, positive visual stimulation from sweeping, rural landscape views and the psychological benefits of being in nature. There are studies that support the importance of aesthetics in encouraging physical activity - the more attractive green infrastructure / active travel paths are, the more they are likely to be used. The other natural and open "reward space" along this route is at Walton, which is in South West Warrington. To remove open space along this network from South East Warrington will negatively affect the quality of life of the local community.

2.60 Reducing this area to a mass housing estate will degrade its aesthetic appeal as natural green infrastructure and will make it less attractive to potential users.

2.61 Removing this open, countryside space for mass development means that there will be additional impermeable surfaces such as concrete, asphalt and compacted soils that hinder water infiltration in this area – an area in the proposed SEWUE will be developed next to already heavily urbanised development.

2.62 We would submit that instead The Timberland Trail should be protected from nearby development.

2.63 We would also ask that WBC clarify its long term intentions with regards to the section of The Transpennine Trail that passes through South East Warrington.

The Bridgewater Canal and Stockton Lane

2.64 The Bridgewater Canal is a key waterway in Warrington and is listed in the PSV 2021 as key green infrastructure. The segment of The Bridgewater Canal that will be impacted by the proposed SEWUE forms part of the unique character and setting of area, with stunning agricultural land that sweeps up the sandstone escarpment to Parrs Wood to the south, Grappenhall Village conservation area to the east and the York Drive / Victoria Road Grappenhall conservation areas to the north. This part of The Bridgewater Canal in South East Warrington offers open countryside and is therefore particularly important, both in terms of the wildlife habitats it supports between the canal and Parrs Wood, but also in terms of the sense of openness one would usually only experience far further into the countryside.

2.65 Because of the stunning heritage and architecture of Grappenhall Village and its nearby lanes and historic houses, this section of the Bridgewater Canal allows visitors a sense of this area of Warrington as it would have been many years ago; a semi rural landscape, quiet paths, sweeping countryside views and life on the canal as it once was. Stockton Lane, which touches the Bridgewater Canal on one side and offers magnificently clear views of fields and hedgerows all the way up to Parrs Wood on the other is a track type road that is used by many local residents, for walking, cycling, jogging, taking children out and dog walking. Parrs Wood provides an important green buffer to the housing development behind it and acts as a beautiful screen at a high point on the sandstone escarpment. Walking along Stockton Lane with its spectacular rural landscape, wildlife and veteran trees is a public amenity of great value to many people.





Stockton Lane

Views to the north from Stockton Lane with Parrs Wood on the horizon to the right; views to the west from Stockton Lane, towards Grappenhall Village conservation area. The area depicted here in these two images is allocated in the SEWUE as a site for a road and mass development, to be called Lumb Brook Green.



The Bridgewater Canal, South East Warrington and site of the SEWUE



2.66 The PSV 2021 lists the Bridgewater Canal as part of its key green infrastructure for Warrington.

A key focus of these efforts will be on reinforcing and **maximising the environmental and socio-economic benefits from**, the following strategic green links which connect the Borough to the wider sub-region:

- a. The Mersey Valley;
- b. Sankey Valley Park and St. Helens Canal;

c. The Bridgewater Canal;

- d. The River Bollin
- e. The Trans Pennine Trail

The Council will work with partners to strengthen and **expand the network of ecological sites, corridors and stepping stone habitats to:**

- a. secure a net gain in biodiversity;**
- b. to expand tree cover in appropriate locations across the Borough;
- c. to improve landscape character, water and air quality;**

Development Proposals affecting Green Infrastructure

All development proposals should, as appropriate to their nature and scale:

- a. protect existing green infrastructure and the functions it performs, especially where this helps to mitigate the causes of and addresses the impacts of climate change;**
- c. improve the quality of existing green infrastructure, including local networks and corridors, specifically to increase its attractiveness as a sport, leisure and recreation opportunity and its value as a habitat for biodiversity;**
- d. protect and improve access to and connectivity between existing and planned green infrastructure to develop a continuous right of way and greenway network and integrated ecological system/network;**

8.3.11 The Strategic Green Network/Links that traverse the Borough are of fundamental importance to the natural environment and character of Warrington and as such the spatial strategy seeks to reinforce this. Policy DC3 outlines a strategic approach to the care and management of the Borough's Green Infrastructure and seeks to conserve the Borough's assets as well as protecting the vital and wide ranging functions these assets perform. **In order to protect the functions that green infrastructure performs proposals for development will be assessed against the; role that the site plays as part of the existing or proposed Greenway Network of recreational footpaths, bridleways and cycleways; its landscape and/or nature conservation value; its value as a buffer zone between other uses; its value as a visual amenity or townscape feature in contributing to the character or appearance of the surrounding area; and its importance as a community resource.**

2.67 The SEWUE plan proposes that this area be developed with mass housing, retail buildings, a school and a road from Parrs Wood north to Stockton Lane on the Bridgewater Canal. This new road notionally stops at Stockton Lane on the Bridgewater Canal in Homes Englands' plan, but it is unclear where it is intended to travel after this. The exits to the A56 at each end of Stockton Lane are via historic bridges; Lumb Brook Bridge / aqueduct and Stanny Lunt Bridge, which are not designed to carry heavy traffic from this site or indeed traffic from any part of the proposed site for the SEWUE, for which these two bridges are key access points. It is unclear if this proposed road is eventually intended to be part of an access road to the Cantilever Bridge across the Manchester Ship Canal.

2.68 This is a site of significant landscape value and visual amenity in the area. It sets The Bridgewater Canal, the Grappenhall Village conservation area, Parrs Wood and Beech Wood and period buildings in the area in their place; it creates a sense of openness and because it forms part of the sandstone escarpment, offers spectacular vistas across Warrington from the edge of Parrs Wood. It is a quite unique setting for landscape proximate to the urban areas of this part of Warrington.

2.69 The fact that there is a road on one side of The Bridgewater Canal at this point means it is more important to protect and preserve the open semi rural landscape on its remaining open side. This area supports birds and other wildlife habitats and it would be at risk of harm were mass development to be undertaken in this area.

2.70 We would submit that such an area of natural beauty should be considered a "valued landscape" – offering woodland, water, wildlife and stunning views to the many settlements in the area. If the area is developed then all of this will be degraded. This will not be evidence of the objective in the PSV 2021 of **"reinforcing and maximising the environmental and socio-economic benefits from...The Bridgewater Canal, securing a "net gain in biodiversity"** and to improving **"landscape character, water and air quality"**. Such development at this location cannot possibly achieve these objectives, nor would mitigation be sufficient to compensate for the loss of such an area.

2.71 Mass development at this area would put not only The Bridgewater Canal's water and air quality at risk of severe harm, it would disrupt quality agricultural soil and the wildlife that has made the landscape between The Bridgewater Canal and Parrs Wood its habitat.

2.72 There would be a serious visual blight on the landscape at this location and would alter the character and setting of the area irreversibly and irretrievably.

2.73 We would submit that putting at risk of harm such an area rich in biodiversity, character and quality green infrastructure by mass development in line with the SEWUE plan does not meet WBC's objective to **"conserve the Borough's assets as well as protecting the vital and wide ranging functions these assets perform. In order to protect the functions that green infrastructure performs proposals for development will be assessed against the; role that the site plays as part of the existing or proposed Greenway Network of recreational footpaths, bridleways and cycleways; its landscape and/or nature conservation value; its value as a buffer zone between other uses; its value as a visual amenity or townscape**

feature in contributing to the character or appearance of the surrounding area; and its importance as a community resource.”

Historical and Heritage Impact of the SEWUE

2.74 PSV 2021 Policy DC2 – Historic Environment says the following:

7. Proposals within or affecting the setting of a Conservation Area will only be permitted where it preserves or enhances the character and appearance of the area including those elements which have been identified within the Conservation Area appraisal as making a positive contribution to the significance of that area.



Grappenhall Village Conservation Area and setting (including start of Stockton Lane)

2.75 Although under the PSV 2021 SEWUE there is no direct development planned at the site of the **two Grappenhall conservation areas: Grappenhall Village and York Drive / Victoria Road**, the SEWUE development, particularly at Stockton Lane / Parrs Wood / Beech Wood will impact the setting and visual amenity of the environment in which these conservation areas are set. Grappenhall Village is situated in a semi rural setting, and the approach to the village from the A56 over Stanny Lunt Bridge into Church Lane forms a key part of that setting. To the right on Church Lane at present is the stunning landscape that borders Stockton Lane / Parrs Wood and which is currently agricultural land. The story of Grappenhall Village's heritage is not limited to the architecture and built landscape, it is also the story of the land used around it. It locates this conservation area in its unique, historical setting and enhances its sense of place.

2.76 The proposals for mass housing development, retail and public buildings and a road in this area would have a severe detrimental effect on the Grappenhall Village conservation area.

2.77 Similarly, although not directly impacted by the proposed SEWUE, the conservation areas at York Drive and Victoria Road sit within an attractive area of period residential dwellings, the front line of which is on the A56, facing the Bridgewater Canal, with views up the sweeping sandstone escarpment to Parrs Wood on the horizon. We would submit that the development of a new mass housing estate (unlikely to be sensitive to the architecture and character of the area based on the track record of development in the South Warrington area) will have a deleterious impact on the open views and aesthetic amenity of the area.

2.78 There are a number of listed buildings in the area, together with structures such as the Lumb Brook aqueduct on Lumb Brook Road, built by James Brindley and Stanny Lunt Bridge over The Bridgewater Canal. These enhance the historic character of the area and will be diminished by what is highly likely to be uninspiring housing estates.

2.79 We would submit that the **Grappenhall Village conservation area has not been adequately assessed in the Heritage Impact Assessment** with regards to its proximity to proposed mass development on the landscape between Stockton Lane and Parrs Wood.

2.80 The **Sustainability Appraisal** accompanying the PSV 2021 says the following;

"Historic Environment: The policy is not directly related to soil resources, and so effects are unlikely to be significant. However, indirect effects could be felt should the policy help to protect heritage associated with agricultural practices (for example, **open agricultural land can contribute to the setting of listed buildings such as farms, barns and cottages.**"

2.81 Specifically by virtue of that part of the SEWUE that proposes mass development on the landscape between Stockton Lane and Parrs Wood we would submit **that the SEWUE does not preserve or enhance "the character and appearance of the area" and should not be permitted.**

Public amenity

2.82 At present, all of the settlements in South East Warrington have easy access to ancient woodland, other woodland walks, open countryside, the attractive setting of The Bridgewater Canal, sweeping countryside views both north and south, and can enjoy a number of historical villages and buildings in a natural, semi rural setting. The sites mentioned earlier in this report are used frequently and offer significant physical and mental health benefits.

2.83 As the settlements are currently located, there is a “breathable” quality to the landscape; whilst there are a number of homes in these areas they have an “open” side at their edges.

2.84 It is a unique feature of the area that these settlements border stunning open countryside, easily accessible by all, despite being part of or close to the urban setting of Warrington.

2.85 This is the quality of “The Lumb Brook Valley” – it is accessible on foot from so many areas in Warrington. It is around a fifteen minute cycle ride from Warrington town centre to Lumb Brook Road and the beautiful countryside it offers its visitors: rural, open landscape with farms, fields, cows, ancient woodland, ponds and the wildlife that exists in this delicate ecosystem. And all of these woodland sites are closely linked and walkable from one to the other, making it easy for the public to enjoy. It is a rare town that has such interconnected natural beauty on its doorstep. The very welcomed Warrington Cycle Map shows which natural green spaces can be reached within a two mile radius of the town centre. Lumb Brook Valley is one of them.

2.86 The key natural amenities accessible to the public in this area will all be severely and negatively impacted should the SEWUE proceed in its current form.

2.87 The settlements that are likely to be directly impacted from the current SEWUE are:

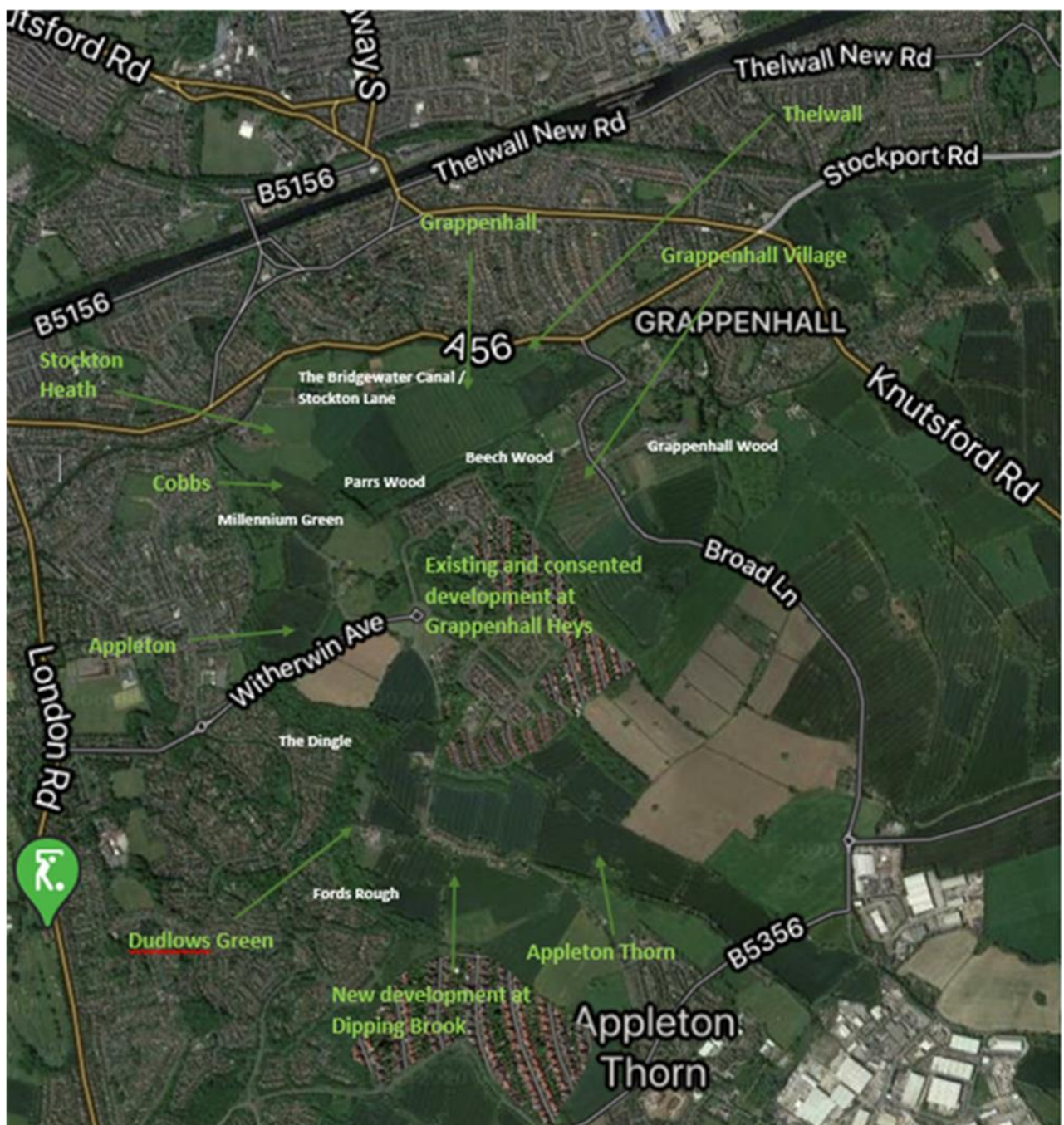
- Appleton
- Grappenhall
- Grappenhall Village
- Appleton Thorn
- Thelwall
- Dudlows Green
- Wrights Green
- Cobbs
- Stockton Heath

2.88 The proposed SEWUE would achieve the exact opposite of what would be most beneficial for people in South East Warrington and its community and indeed, what would be most likely to satisfy the objectives in the PSV 2021: it plans for development in the areas people enjoy walking through, which are the most picturesque and interesting and which support a lot of wildlife - and removes from the proposed development the places that are accessible only really by car via main roads on the outskirts of the area leading to the motorways. The current SEWUE plan not only suffocates important woodlands and wildlife, it crams housing development up against existing fairly dense development, meaning a

significantly increased number of people and cars are going to be battling for space, services and roads.

2.89 Reducing this area to a mass housing estate will degrade its aesthetic appeal as natural green infrastructure and will make it less attractive to potential users.

2.90 While it is common knowledge that we benefit psychologically from being close to nature, there is a difference between spending time in a curated or manicured development landscape within a housing estate and spending time in natural open countryside with wide ranging, open views. The psychological benefits of not feeling closed in, of having breathable space around you far outweighs that of walking through a "green" path in an urban housing estate.





2.91 As a result of the proposed SEWUE, all of these settlements will be blocked from open countryside.

2.92 For access to open green space all of those living in these settlements would have to travel through the new housing developments to reach open fields and space – on the far eastern of South East Warrington and as pleasant as the landscape is there, **it adjoins the A50 and does not have the same sense of being in the open countryside**, nor is it adjacent to important nature habitats, Local Wildlife Sites and ancient woodland. It also does not offer the same sweeping views of the landscape. **The landscape here, while still attractive, is flatter, less interesting and cannot get beyond its proximity to the A50, a main road.**

Landscape, Unique character and setting, sense of openness

2.93 The NPPF 2021 provides for the following;

“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);

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;

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;**”

2.94 The [Landscape Character Assessment](#) that forms part of the PDO 2017 evidence base “Natural environment and climate change” says the following about the land that is the subject of the current SEWUE:

“The landscape character of these areas comprises of strongly sloping land to the north, **affording sweeping long distance views**, occasionally restricted by the presence of linear deciduous woodlands, coverts and tree groups. **The incised wooded valleys of Lumb Brook, its tributary Dipping Brook and the streams feeding Appleton Reservoir are also strong features in the landscape.** All the streams flow almost due north with minor tributary streams fed from spring lines just below the escarpment crest. The presence of red sandstone frequently punctuates the landscape in the form of outcrops to road and canal cuttings, quarries and in the building of vernacular houses and walls. Raised ‘knolls’ at High Warren, Hill Cliff, Hurst Farm and **Grappenhall Heys provide exceptional viewpoints and stand out in the landscape.** Marl pit ponds occur frequently in random locations within the farmland and are often highlighted by overgrown margins of alder and willow. The farmland comprises mainly of pastureland with arable fields to the gentler sloping ground. Hedgerow trees are present but not in great numbers.

“Landscape Sensitivity In a borough-wide context, both these areas are reasonably well-wooded with a diversity of features in the landscape, including small ponds, ridges, knolls and incised stream valleys. The agricultural landscape including hedgerows appears generally well-maintained and the area presents an attractive rural quality. **Both these areas however are particularly sensitive to further building development.** Larger tracts of land in the Appleton and Grappenhall areas are designated for housing development and much of the road and drainage infrastructure is already in place. **Much of the existing landscape will therefore be lost. Although areas of advanced planting have taken place, this development is planned as blanket coverage, ignoring particularly sensitive parts of the landscape such as the**

knolls and crest lines to the escarpment. The effect of 'planning blight' has also had the effect of proposed land having been left unfarmed for several years.

"The crest line of the escarpment is particularly important as this forms the main horizon to views south from the northern half of the Borough. The traditional isolated focal points of church towers along the crest are slowly being occluded by development.

2.95 The Landscape Character Assessment also says the following;

"Major changes to the landscape have taken place over recent years following the planning designations for house building. Large areas of agricultural land have been lost to housing estates and this trend is set to continue on a large-scale in the Appleton and Grappenhall areas. Associated with the developments has often been the planting of advanced strips of native woodland. These will break up the housing mass but the existing landscape will be entirely changed. Few other major changes since the Enclosure Acts have affected the present day landscape. Previous dramatic change to the landscape on a local scale also occurred following the construction of Appleton Reservoir and the covered reservoir on the crest at High Warren. Warrington and Runcorn Development Corporation has **radically altered the landscape in this area through its development for housing. This has already taken place over high grade farmland (Grade 2)** mainly to the immediate east of Lumb Brook and this policy is progressing to the south up to the ridgeline adjacent to Appleton Thorn."

2.96 The advice to better protect this stunning, but threatened landscape in the Landscape Character Assessment is as follows:

"The main objective for these areas should be to aspire to retain their present status as a well-managed agricultural landscape. **The currently proposed large areas of housing development however works against this objective and will cover some of the most attractive landscape in the Borough.** Development in particular on the escarpment crest lines and knolls should be prevented or screened by woodland planting. The remaining landscape will require a continuance of good agricultural management practices, together with the encouragement of enhancement works such as replacement of hedgerow trees and the restoration of marl pit ponds."

2.97 Further, the [Sustainability Appraisal](#) accompanying the PSV 2021 SEWUE says the following:

"South East Warrington Urban Extension: 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. Whist 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. There would be a mix of Green Belt parcels involved of varying sensitivity. The majority of parcels would either have a weak or moderate contribution. With layout and design, and avoidance of inappropriate development in the more sensitive locations, the effects could be managed somewhat. **However, the cumulative effects of such large scale development would be difficult to eradicate completely. Therefore, moderate negative effects are predicted overall.**"

2.98 We would submit that the proposed SEWUE in its current form would have a **significant** negative effect on the landscape of the area, which has been made clear by the Landscape Character Assessment. Advice in the Landscape Character Assessment is to "Control planned housing development, pulling back construction on the skyline crest" (p189).

2.99 We feel that the Sustainability Appraisal and other documents prepared for the PSV 2021 underplay the damage mass development will cause to this very attractive landscape. We do not believe that policies in the PSV 2021 will mitigate, adequately or at all, the damage that will be done should the SEWUE proceed in its current format.

2.100 The PSV 2021 proposed SEWUE will clearly impact the landscape character of the area – which is also not addressed, adequately or at all, within the **SEWUE: A Deliverable Proposition.**

2.101 The Sustainability Appraisal : Health and Wellbeing accompanying the PSV2021 says the following;

"With regards to open space and access to the countryside, development of the Green Belt for housing is likely to be perceived as negative, and in some instances could have negative effects with regards to amenity. However, much of the SEWUE and Thelwall Heys consist of agricultural or brownfield land which is not currently particularly valuable from a recreational perspective."

We would reject this submission, not only because access to open countryside has been demonstrated in innumerable studies to have a positive effect on physical and mental health and wellbeing, but the "agricultural" landscape referred to here forms part of the unique open character and setting of the area and provides the settlements surrounding this agricultural land with a sense of place. Drawing people out for recreation is more likely to be achieved if the area in which they spend their time outdoors is attractive and open.





Design and Quality of Place: Biodiversity and Green Infrastructure

Homes England and partners as stewards of mass development at the SEWUE

2.102 In our opinion the local plan is also not sound because of the partnerships entrusted to deliver it. Homes England and its national volume developer partners proposed in the plan and SEWUE: A Deliverable Proposition have not established a track record of delivering the architecture, master planning skill, sensitivity to surrounding environment, rural sensibility, ecological protection and biodiversity enhancement that would be required for development in South East Warrington.

Homes England in its previous iteration says the following in its 2016 [Warrington Borough Council's "Call for Sites" in South Warrington in 2016](#), ahead of the preparation of WBC's Preferred Development Option 2017, **referring to the sites now proposed as the location of the SEWUE.**

"Ecology

5.13 The subject land is not covered by, and does not lie in close proximity to, any statutory ecological designations. There are no sites of non-statutory ecological designation within the subject land.

There are, however, 2 non-statutory sites adjacent to and falling between the parcels which comprise the subject land. These are shown on Drawing SW3 attached at Appendix 4 and are summarised below:

- Grappenhall Heys Woodland and Grappenhall Heys Woodland Shelter Belt: This covers an area of approximately 4.43ha and is split onto two parts, Part 1 (Shelter Belt) is located to the north, east and west of the existing Grappenhall Heys residential development (northern section) and Part 2 (Woodland) located to the south of the existing Grappenhall Heys residential development (southern section). The Woodland and Woodland Shelter Belt are both designated as a Site of Interest for Nature Conservation (SINC), a Local Wildlife Site (LWS) and a Warrington Woodland Trust Site; and*

- The Dingle and Fords Rough Site of Interest for Nature Conservation (SINC) and Lumb Brook Valley Warrington Woodland Trust Site. This designation follows a route adjacent to the western boundary of the subject land either side of the Doods Brook watercourse. This designation also includes a number of trees covered by Tree Preservation Orders.*

5.14 It is clear from the above that the ecological value of the subject area is low in terms of identified ecological sites. Whilst the current agricultural use of the land and open countryside nature means that it is likely to provide habitat for a number of ecological species, 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. The presence of any protected species present on the land can be fully protected through the usual planning and consenting process. The development of a detailed masterplan for the land represents an opportunity to fully consider a site wide ecological mitigation strategy.

2.103 It is not reassuring to read that the ANSW, LWS and other key ecological sites in the South Warrington area are dismissed in such a manner by the agency that wishes to oversee mass development in the area. It is also not reassuring to read the following, which is taken from the Homes and Communities Agency (Homes England's previous iteration) report in conjunction with [Warrington Borough Council's "Call for Sites" in South Warrington in 2016](#).

*"There are numerous ponds within the existing farmland with several linear woodlands, coverts and tree clumps. **Some of these semi-natural woodlands would serve to function as advanced landscaping and entrance features for future development plots**"*

2.104 **Homes England is not convincing in their commitment to protect biodiversity, given their proposed development also blocks in every single woodland on all sides, risking irreparable harm and depriving them of natural light.** In the Call for Sites 2016 document HCA labels ASNWs The Dingle and Fords Rough on their map of the area, "significant existing vegetation". We would submit that the partnerships involved in the SEWUE proposed "masterplan" do not have the knowledge, skills or incentive to oversee mass development of the nature proposed in such close proximity to such fragile ecosystems and ecological networks that support ancient woodland deemed "irreplaceable", important Local Wildlife Sites, The Bridgewater Canal, other stunning woodlands, conservation areas and landscape with the visual amenity and sweeping views this exceptional area provides.

2.105 We can look at the track record of Homes England, or its previous iterations for evidence as to whether or not they and their partners would be competent to provide development that would meet the aims and objectives of the PSV 2021 and SEWUE.

2.105 Homes England or its predecessors and the developers with whom they have collaborated have produced a number of housing developments on land in the area, as a result of their ownership of historical "New Town" land. The land has been in the ownership of Homes England (or its predecessors) since the 1980s.

2.107 This an example of "mitigation" and "biodiversity enhancement" at a recent development as a result of collaboration between Homes England (or its recent predecessor HCA) and a volume developer with their "nature garden" in South East Warrington.



2.108 In the “Call for Sites” 2016 document Homes England / HCA reference their development at Pewterspear as an example of “successful green infrastructure”.

“There are numerous ponds within the existing farmland with several linear woodlands, coverts and tree clumps. Some of these semi-natural woodlands would serve to function as advanced landscaping and entrance features for future development plots. **This would reflect the successful existing green infrastructure provision in neighbouring residential areas including Pewterspear.**”

2.109 The development at Pewterspear, while pleasant, is a typical suburban development that happens to be in a semi natural landscape, as are all of the other developments built via Homes England or its predecessors on land in South East Warrington.

2.110 It would appear that under Homes England stewardship the “semi natural woodlands” in South East Warrington referred to above would be given the same aesthetic treatment as was given to providing green infrastructure at Pewterspear.

A sample of the green infrastructure at Pewterspear is here:



Again, it is pleasant enough, but ultimately it is an unremarkable, somewhat utilitarian green space.

2.111 We would submit that a particular level of skill, desire and sense of aesthetics would be required to develop sensitively and creatively in South East Warrington, particularly on such a scale, to ensure that the ancient woodland, fragile habitats and ecosystems, precious wildlife, woods and waterways are left untouched and that existing natural green infrastructure truly is protected and enhanced within its stunning landscape setting. There is no evidence that Homes England and its partners have such skill, desire or sense of aesthetics.

Design and Quality of Place: development under the stewardship of Homes England and Partners

2.112 Linked to the aforementioned is Homes England and partners' proposed stewardship and masterplanning of the SEWUE when it comes to **competence in "design" and "quality of place"**: key elements of development on which we are delighted to see emphasis in the PSV 2021 has been placed.

2.113 The Objectives and Policies set out in the PSV 2021 are as follows:

Objective W5:

To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst **protecting, enhancing and embracing the Borough's historic, cultural, built and natural assets.**

8.6 Warrington's Quality of Place

8.6.1 High Quality design is fundamental to making places more attractive, sustainable, safe and accessible. High quality design is not just about how a development is visually perceived but also whether it is successful in its context, functions well and contributes towards broader sustainability objectives.

8.6.2 The way buildings and spaces are designed has a direct impact on both the built and natural environment, and in turn users of that environment. Good design can help reduce and mitigate the impacts of climate change, promote healthier lifestyles, create safer places and make high quality and attractive places that create pride amongst residents and encourage further investment.

2.114 The policies in PSV 2021 that aim to achieve this are set out below:

Policy DC6 - Quality of Place

Good design should be at the core of all development proposals having regard to the following principles:

1. Design and Layout

a. Respect, sustain and **make a positive contribution to local character and distinctiveness** within the surrounding area, and where appropriate the landscape setting, having regard to density, street layouts, scale, height and massing;

e. Encourage innovative design solutions that are **appropriate to the local context**;

2. Materials

a. Use a palette of high quality materials **which are appropriate to the local context** in all respects including: type, colour, texture, element size and laying pattern and avoid unnecessary and excessive patterning;

b. Where contemporary materials are appropriate, **use these in manner which respects the established character of the locality**; and

d. Design places that meet the principles of 'Active Travel' and promote a healthy active lifestyle.

2.115 The **NPPF 2021** sets out the following in relation to design of developments:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. **Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.** Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) **are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;**

c) **are sympathetic to local character and history, including the surrounding built environment and landscape setting,** while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) **establish or maintain a strong sense of place,** using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and **distinctive places** to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined.

2.116 Not one housing estate has been built sympathetically to its semi rural surroundings in the South East Warrington area. This has historically been the case and continues today.

2.117 The **Landscape Character Assessment** that forms part of the PDO 2017 evidence says the following:

“Recently constructed housing estates and roads built by Warrington New Town breached the north-south barrier of the Lumb Brook / The Dingle valley by extending Lyons Lane and connecting Grappenhall Heys with the Dudlows Green area. Private housing under the New Town has been constructed in the Grappenhall Heys area and under the New Town’s successor organisation, English Partnerships. 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.**”

Warrington and Runcorn Development Corporation has radically altered the landscape in this area through its development for housing. This has already taken place over high grade farmland (Grade 2) mainly to the immediate east of Lumb Brook and this policy is progressing to the south up to the ridgeline adjacent to Appleton Thorn. The knoll adjacent to Grappenhall Heys has already been subsumed by new housing thus devaluing it as a landscape feature. **The new housing has little visual relationship with the local vernacular, and is its layout is often unsympathetic to the landscape.”**

2.118 The volume developers who have already worked with / are working with Homes England and its predecessors to produce housing in the area have created monocultural housing estates, heavy in tarmac and which bear no resemblance to the local vernacular. The development undertaken thus far is not sensitive to the surrounding environment and could in fact be located anywhere in the U.K. Architecturally it is incongruous with the semi rural / rural / agricultural nature of the area and adds nothing to the aesthetic quality of the landscape. Building urban housing in the middle of green fields and trees doesn’t make them an appropriate semi rural design.

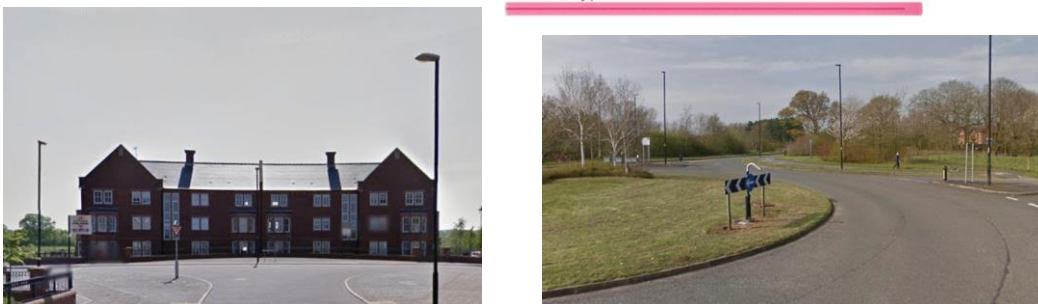
2.119 Photo taken from the HCA Call for Sites document 2016, presumably considered to be an attractive marketing image:



Photographs of development in South East Warrington: Homes England / HCA land



2 of 2 Typical autumnal sunset street scene



2.120 While no disrespect is intended towards house buyers – these properties are no doubt well functioning, clean and safe houses – we should expect and demand better from our developments. If you're going to disturb the precious earth and change the face of the landscape forever, surely it makes sense to create in its place something of equally great longevity and aesthetic value, as far as one is able? **These developments do not add to the character and distinctiveness of the area – they merely rely on it to sell the houses. That is not the same thing.**

2.121 It would be wrong to say *noone* likes these housing developments - people buy the houses. But it does beg the question - is this because there are no other options available? They are well located and modern - but perhaps a way of looking at it would be: what if this is all that had ever been built? Where would our village and town centres be? Where would our architecture be? What would our civic buildings look like if these standards had always been sufficient? Would these houses attract visitors in the future, marvelling at homes of the past? In failing to create interesting communal spaces, social infrastructure and attractive public and private buildings we are actually being quite lazy - we are relying on the town and village makers of the past, who installed the shops and libraries and pubs and interesting walkable streets to enhance our experiences. We are happy to use their labours while contributing very little to our architectural heritage ourselves.

2.122 Unfortunately, the Homes England developments in recent years offer little vision or sense of place, architectural assimilation or walkable streets. It would therefore be our submission that either they have no clear understanding of the government's guidelines on creating new developments with a sense of place, or have no power or inclination to prevent the volume developers building housing estates as they choose, which invariably have little distinctiveness.

2.123 There would also be concern about the design, style and nature of development under Homes England near the setting of the conservation areas in South East Warrington. The prospect of a housing estate in the style of the images above at Stockton Lane and The Bridgewater Canal / Parrs Wood / Beech Wood would have a negative visual impact on the semi rural and architecturally sensitive setting in which Grappenhall Village sits.

2.123 **The “volume-developerisation” of our urban, suburban and semi-rural areas has done little to enhance the distinctiveness and quality of the town's landscape.** Rather than carefully planning walkable streets and attractive communal spaces we've seen vast tracts of land effectively removed from the public realm to be turned into tarmac heavy culs de sac enclaves, heavily car dependent and with no social or retail infrastructure.

2.124 Despite there being clear direction from the government regarding new developments by commissioning work such as the Living with Beauty report, a set of design codes, the setting up of an Office for Place and so on – there has been momentum building in this regard for some time now – there is little evidence that the developers at Warrington sites really appreciate its importance. There are some developments by volume developers working with architects and masterplanner in the UK that are stunning and sit beautifully in their surroundings – they just aren't in Warrington.

2.125 We find it extraordinary that a town that boasts of its first rate economic heft and natural green space would so consistently settle for second and third rate housing developments. It is unclear why the town has been burdened with such mediocrity. However, we are pleased that emphasis has been given to quality of design, design codes, sense of place and sensitivity to the development's surrounding environment in the PSV 2021, including a note that; "Development should have due regard to the site and wider setting in respect to layout, movement and connections, scale and height, landscape character, townscape character and in their appearance both in terms of architectural quality and materials. Development should also ensure high levels of passive surveillance of streets, spaces and parking through the arrangement and design of buildings, streets and spaces and the activity within them. **Boundary treatments and hard surfaces are equally important to successful design.**"

Community Involvement in the planning and design process

2.126 The **NPPF 2021** says the following:

"Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics." and, "Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community."

2.127 It does seem incredible that land is bought and allocated, arrangements made with developers and then plans drawn up without input from the community by those who don't seem to have much knowledge of the local area. Developments are presented as a fait accompli that the local community has to then challenge, undo, object to, criticise. Why not have community involvement in the first place? Anecdotally, it is not clear any real cognisance is taken of the local community's views and objections in any event, let alone regard to their local design statements. We would submit that more needs to be done to involve the local community in the planning process from the outset.

3. Proposed Modification

3.1 Our principal stance is that we are not in favour of development on the green belt and that Warrington Borough Council will need to establish that exceptional circumstances exist that justify removal of land from the green belt.

3.2 We would also propose that green belt land not be released for the first five years of the plan, to maximise development on brownfield sites and to encourage regeneration in Warrington town centre, with review every five years to take stock of current housing numbers.

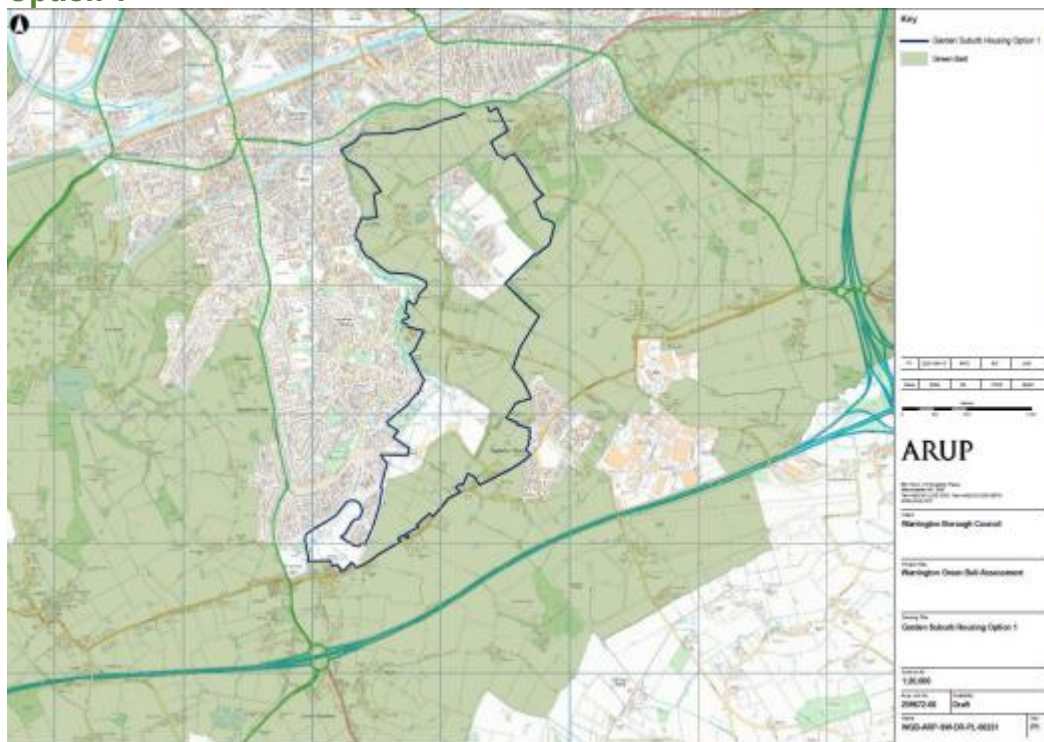
3.3 We would also urge where possible to build near railways, to better enable sustainable travel and move away from car dependency.

3.4 We note that the necessary infrastructure would need to be in place before further development in the area.

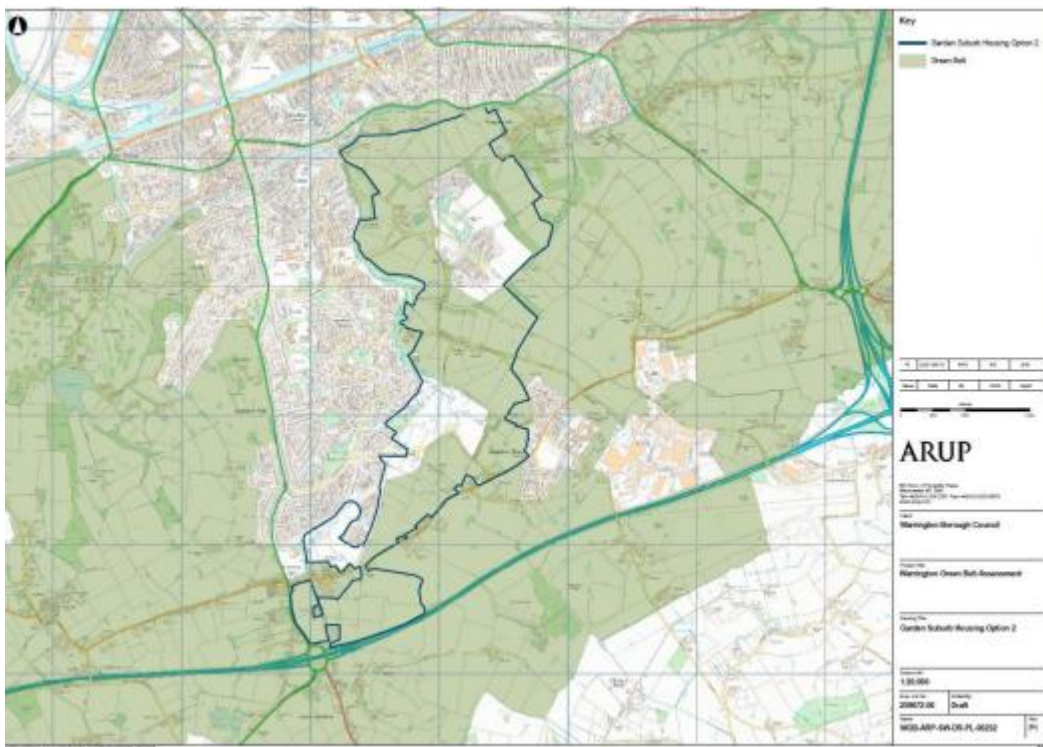
3.5 All of the above notwithstanding, we would respectfully submit that if development is to take place in South East Warrington then the most appropriate site to do so, and that which would cause the least harm to the existing communities would not be Option 2, as considered in the Green Belt Assessment and Sustainability Appraisal and which is the preferred choice in the PSV 2021 SEWUE. We would propose that Option 4 is the best site for development.

3.6 There were four options that were considered in the Green Belt Assessment and Sustainability Appraisal, which formed the basis of the decision to propose the SEWUE in its current form:

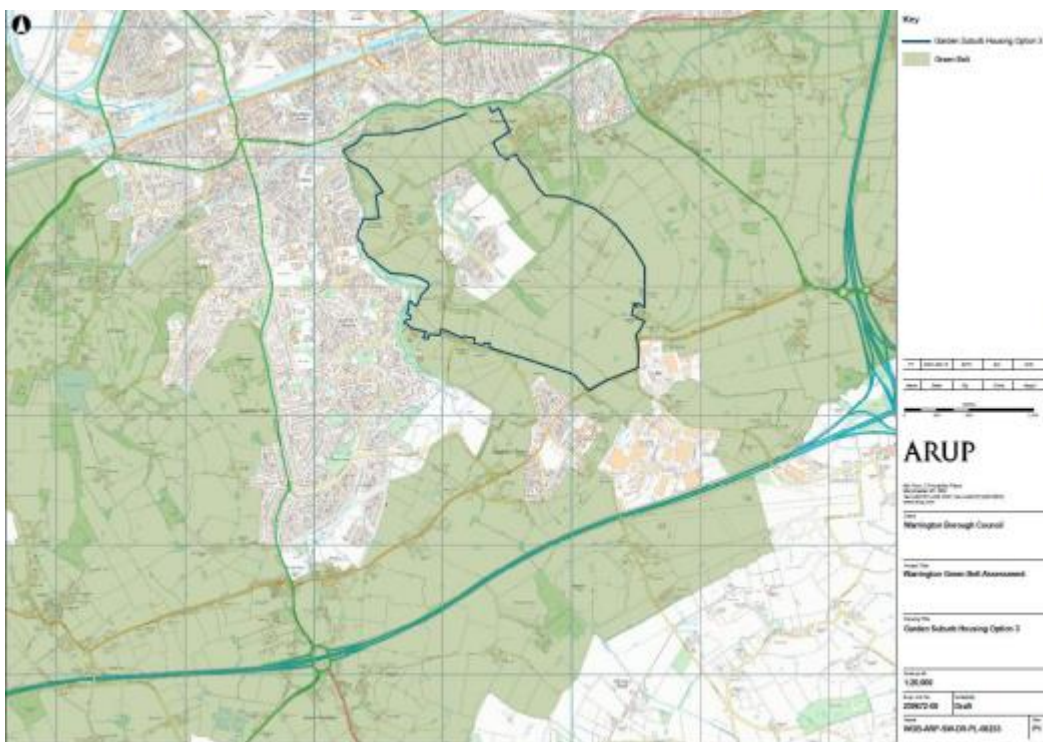
Option 1



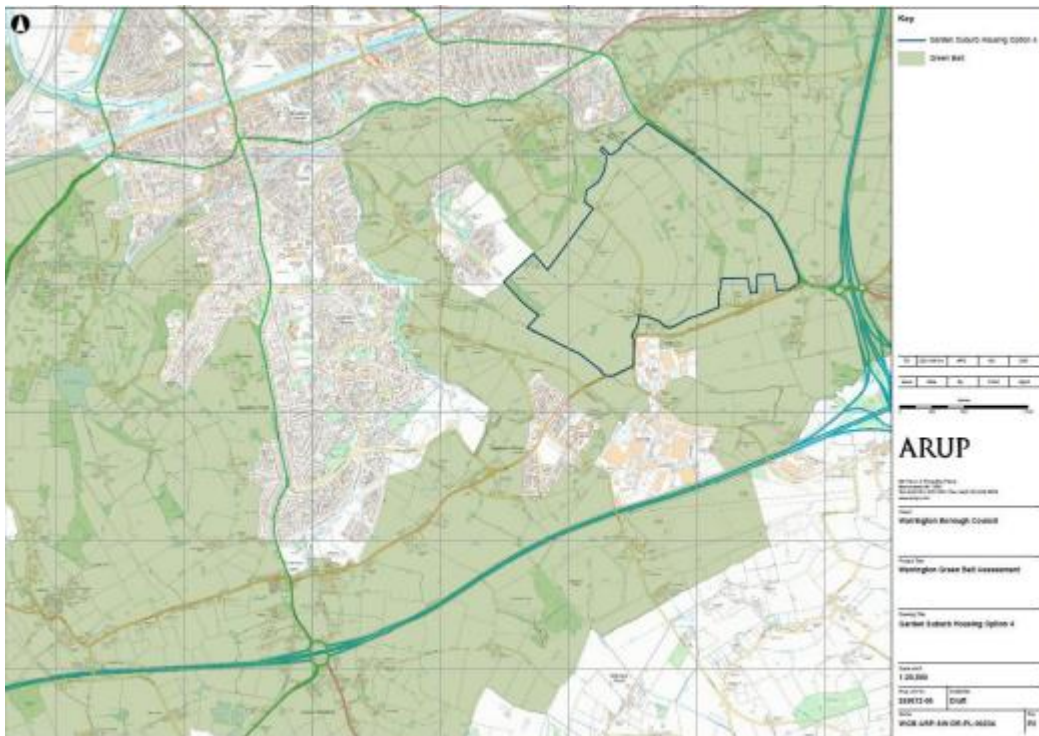
Option 2



Option 3



Option 4



3.7 It can be seen that the first three options are essentially the same. All broadly follow the site of the current SEWUE and comprise in the main of land owned by Homes England and is the site of land proposed for development under New Town plans around fifty years ago. Option 4 is a different configuration, on land adjacent to the A50 and near to the proposed new South East Warrington employment area.

3.8 The current SEWUE involves an extension to the existing urban areas, so that there will be continuous urban development until the new green belt boundary. This means that there will not be any meaningful open geographical space between Appleton, Appleton Thorn, Grappenhall Heys, Stretton, Stockton Heath, Cobbs, Grappenhall, Dudlows Green, and Wrights Green and the new SEWUE.

2.10 This proposal, as is documented, effectively “rounds off” the existing developments into a neat parcel, leaving the green belt and open countryside further east, near the A50 and the motorways.

3.11 Considering the options in more detail, **the assessors came to the following conclusions:**

- a) *Option 4 performed “less well” as green belt than Options 1, 2 and 3.*
- b) *All four options performed similarly with regards to the effects of housing growth. Each option can accommodate a large and concentrated population in an area which is relatively well connected to a number of existing and planned employment areas, in particular the nearby South East Warrington Employment Area, subject to confirmation*

of this as an allocation in the Plan, and the town centre subject to ensuring appropriate transport improvements.

- c) Options 1 and 2 had good access to existing local natural greenspace throughout the proposed development locations. Where option 3 overlaps with option 1 and 2, access to existing accessible natural greenspace is also good. However, the remaining areas are currently agricultural. Access here is currently poor, but it is presumed that green infrastructure enhancements could be secured. Option 4 has the poorest accessibility to existing natural greenspace, but enhancements ought to be possible.*

3.12 Our response: This depends on **how you assess** "access" to "natural green space". We would respectfully submit that the assessors' conclusions are precisely the wrong way around. If they were to mean the existing natural landscape at Option 4 is poorer quality and therefore there will be "poorer" natural green space as part of a housing estate, then perhaps, yes, although Option 4 still carries pleasant landscape. But this is the point; **the point is surely to preserve and enhance the most valuable natural landscape** for *all* of the community in South Warrington to enjoy **and to protect our precious and irreplaceable habitats, not impose a mass housing development on the most scenic open countryside so that new settlements are a few minutes closer to what will be left of it.**

d) Option 4 was somewhat more isolated and did not benefit as much from links to the urban fringes or existing small centres such as Grappenhall Heys and Appleton Thorn. There would be a greater need for self-sufficiency.

3.14 Our response: We would reject this assertion. Option 4 is within walking distance of a range of shops, pubs, restaurants, services and community centres in Grappenhall and Thelwall, although we would also expect there to be amenities at the development site itself. It is within easy walking and cycling distance of Grappenhall Heys and Appleton Thorn, being relatively flat landscape here, and has the benefit of sparing the most valuable habitats and attractive landscape in the area, leaving them in open countryside for existing and new residents to enjoy. We would also submit that social and retail amenities in Grappenhall, Thelwall and Appleton Thorn would derive greater benefit from more custom – Stockton Heath already has a substantial "customer base".

- d) With regard to health services, existing capacity to the south of Warrington is constrained and the scale of growth under all options would require the expansion of facilities. It is unclear if new facilities could be built. Therefore, access to existing facilities is important.*
- e) Overall, each option is predicted to have minor negative effects as growth could contribute towards increased traffic in areas that suffer poor air quality. Where development is adjacent to existing settlements, local communities might experience amenity issues. This is more likely to be an issue for options 1 and 2 which involve land adjacent to Grappenhall Heys, Stretton and Appleton Thorn.*

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- f) For options 1, 2 and 3 there are existing public bus services passing through Grappenhall Heys and Appleton Thorn and connecting to the central Warrington area. Option 4 is somewhat more isolated with regards to existing transport links.*

3.15 Our response: Again, we would disagree with this assertion. Option 4 would not be more isolated, as it is within walking distance of Grappenhall and Thelwall, and indeed Grappenhall Heys and Appleton Thorn. It would also place less of a burden, both physically, psychologically and ecologically on an already overburdened, densely populated area, being Appleton and Stockton Heath.

3.16 Our response: The public transport issue is something of a red herring; no matter where this new development is sited, people will still use their cars, even for short journeys. We would like this not to be so. It should be also possible to add public transport to service Option 4, if for no other reason that it will be necessary to offer a public transport service to the proposed new employment site in South East Warrington. There are already bus services that travel along the A56 and the A50, these could be modified or extended.

- g) Whilst the site could lead to some increases in congestion, especially at peak journey times, a large site (recognising further growth beyond the plan period) also increases the viability of infrastructure improvements intended to mitigate the effects of increases in traffic volumes. Overall, moderate positive effects are predicted for options 1-3, as development could help to improve services for existing communities, as well as creating accessible neighbourhoods for new communities. Alongside these benefits, some minor negative effects could be anticipated if there are localised increases in congestion. Some parts of the South East Warrington Urban Extension might also be less well served than others with regards to walkable services and public transport. The positive effects are less significant for option 4 given that it is less well serviced by existing roads, public transport and community facilities.*

3.17 Our response: While an increase in housing and therefore cars and people will inevitably lead to congestion, we would submit that congestion at Options 1, 2 and 3 is likely to be more severe. The main roads that bound the proposed development sites are Lumb Brook Road and Broad Lane, both of which culminate in the passing over or under a narrow historic bridge; either Lumb Book Bridge / Aqueduct on Lumb Brook Road, a narrow pinch point which regularly sees traffic backed up, or Stanny Lunt Bridge and Church Lane Bridge that lead on from Broad Lane.

3.18 Our response: Option 4 at least has the A50 alongside a substantial part of it, as well as the B5356, Cartridge Lane and Broad Lane, offering a number of exits from the site, once the appropriate roads on the development are added.

- h) The area covered by option 1 is partially urbanised but mostly comprises Grade 2 (over 100 hectares) and Grade 3 agricultural land (Over 150ha in total). Much of the agricultural land is in existing agricultural use. Cumulatively, development would result in the permanent loss of important agricultural land resources, which is predicted to have a major negative effect.*

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- i) *The area covered by option 2 is partially urbanised but mostly comprises Grade 2 (206 hectares) and some Grade 3 (70 hectares) agricultural land. Much of the agricultural land is in existing agricultural use. Cumulatively, development would result in the permanent loss of approximately 276 hectares of important agricultural land resources, which is more than double the amount involved at other strategic locations (particularly in terms of the mix of Grade 2 to Grade 3 land). As a result, major negative effects are predicted.*
- j) *The area covered by option 3 is partially urbanised but mostly comprises Grade 2 (222 hectares) and some Grade 3 (15 hectares) agricultural land. Much of the agricultural land is in existing agricultural use. Cumulatively, development would result in the permanent loss of approximately 237 hectares of important agricultural land resources, which is predicted to have a major negative effect.*
- k) *Option 4 would result in the loss of mostly Grade 2 (189 hectares) and some Grade 3 (13 hectares) agricultural land in existing agricultural use. Cumulatively, development would result in the permanent loss of approximately 202 hectares of important arable agricultural land resources, which is predicted to have a major negative effect.*

3.19 Our response: It is not clear exactly what the total number of hectares of agricultural land would be lost with Option 1 – but Option 2, the proposed site of the SEWUE results in a far greater loss of agricultural land than Option 4.

3.20 There is also a query raised by the fact that in the Sustainability Appraisal the site of the proposed green belt and SEWUE is described as being mostly grade 3 agricultural land, when this does not appear to be the case.

j) Overall, moderate negative effects are predicted for all four options [for air quality], though these would be expected to peak in the medium term. As electric vehicles start to dominate the roads, the impacts on air quality due to traffic are likely to reduce drastically.

3.21 The assessors conclude that:

- *Options 1 and 2 perform strongly against a number of Plan Objectives. They perform best in terms of contributing to the sustainable growth of the main urban area of Warrington as a whole.*
- *They would enable better integration within communities, facilities and public transport services in Stockton Heath, Appleton and Stretton.*
- *Compared to Option 1, Option 2 is likely to require the least amount of off-site highways works necessitating third party land, which is a positive factor in terms of deliverability.*
- *Options 3 and 4 could potentially have a greater negative effect upon landscape character compared to options 1 and 2.*

-
- *The effects on health and wellbeing are more likely to be of major significance (positively) for Options 1, 2 and 3, which build on existing communities and 89 services. This is also reflected in the accessibility performance of the options, which is least positive for Option 4.*
 - *Option 4 performs slightly better than the other 3 options with regards to biodiversity impacts, but there is a degree of uncertainty.*
 - *Options 1 and 2 perform less well compared to options 3 and 4 with regards to built heritage. However, effects are predicted to be of minor significance.*

3.22 Our response to these conclusions would be as follows:

- a) Options 1, 2 and 3 encroach upon ancient woodland, Local Wildlife Sites, The Bridgewater Canal, The Timberland Trail, sweeping views to the north and south and will negatively impact on the unique character and setting of the South Warrington area. This has already been considered in detail in this document.
- b) Options 1,2 and 3 remove the most attractive and interesting landscape and leave the least attractive landscape as the "open countryside" available as a public amenity – few people use the Option 4 landscape for walking as it is further away and is degraded by its being adjacent to the A50.
- c) Options 1, 2 and 3 add a further dense urban layer to an already densely populated area, blocking in existing settlements in the area and depriving existing settlements of easy access to open countryside and stunning landscapes and green space.
- d) Options 1, 2 and 3 mean that mass development will lead to residents in existing areas having to travel through these new housing estates to reach open countryside on the far eastern part of South East Warrington.
- e) Options 1, 2 and 3 are not sited within walking distance of the South East Warrington new employment area.
- f) We reject the assertion that Option 4 would have a greater negative impact on landscape character than Options 1, 2 and 3. Option 4 comprises landscape mainly visible to traffic leaving and approaching the two motorways, and for which the main settlement is sited directly alongside the A50. While partially visible from the A50 (for traffic, as pedestrians do not walk along the A50) it is mostly heavily screened with mature hedging at significant height.
- g) The land itself at Option 4, whilst attractive (as is all landscape in the South East Warrington area, and one of the reasons development there has been so strongly opposed), offers less by way of natural amenity (but good for development).
- h) It does not offer the sweeping landscape views that give the South East Warrington area the semi rural sense of place that the landscape at Options 1,2 and 3 offers.
- i) The land at Option 4, although attractive in its own right, does not really add to the "landscape character" of the area in the way that the land at Options 1, 2 and 3 do. It cannot escape the fact that it is adjacent to the A50 and there is the motorway in the distance.

k) We should be aiming to protect and enhance our green spaces and our access to the natural environment. Leaving the semi rural landscape at Options 1, 2 and 3 alone means that more people will benefit from easy access to open countryside.

l) Should Option 2 proceed, areas of attractive countryside that are in close proximity to existing settlements and are enjoyed by many, not to mention the protection this open countryside affords its nearby habitats. Its ancient woodland, other woodland, The Timberland Trail and the habitats of the Bridgewater Canal and the land between the canal and Parr's Wood will be removed and instead South East Warrington will be left with landscape / green space that is not really widely used, and which can never confer the sense of being in the countryside, or being in the tranquility that the landscape at Options 1 and 2 confers, because it cannot escape its location next to the A50 and somewhat proximity to the motorway.

m) Option 2 will also add to the burden on the "heat island" of the already fairly densely developed areas of Appleton, Grappenhall and Stockton Heath. Option 4 offers these and other settlements in the South East Warrington area breathable space and landscape.

n) Option 2 is in danger of becoming simply "urban sprawl"; a mass development latched on to existing settlements. We should be pivoting to a different way of living now, one focused on the natural environment and the outdoors - because this is the way we will better learn to take care of it. The SEWUE is a plan for the twentieth century - where nature was an accoutrement; a marketing feature used to embellish an otherwise unremarkable housing development, not an essential component of a planet that must be cared for.

o) If the proposition is to focus on development around the existing developments at Grappenhall Heys and beyond then this will constrain opportunities to create new developments that harmonise with their surroundings - because the developments currently there don't. It would be more challenging to develop a cohesive masterplan at the site of Option 2 as there are already (or will shortly be) at least four different types of housing settlement and design at this location. We are not advocating for uniformity - but it is going to be more difficult to create a truly unique place that is distinctive in character and sits well in its environment. The developments would be in danger of "fighting" each other aesthetically.

p) We would submit that greater sustainability - i.e. leaving the planet in a better place for our ancestors will not be realised by packing thousands of homes and people next to already heavily developed areas and depriving them of easily accessible open countryside and green space. It will simply cause mass congestion and pollution loaded in a densely populated urban settlement and move the remaining open countryside and green space further away.

q) Option 4 impacts fewer settlements and therefore people. Options 1,2 and 3 would negatively impact on settlements at

- Appleton
- Grappenhall
- Stretton
- Grappenhall Village

-
- Appleton Thorn
 - Thelwall
 - Dudlows Green
 - Wrights Green
 - Cobbs
 - Stockton Heath

There would be some impact on Grappenhall, Grappenhall Heys and Thelwall with Option 4, but the new development would not be directly adjacent and there would remain “breathable space” between the settlements.

r) None of these reasons prioritise the area’s important ecological networks and natural green infrastructure, its contribution to the natural environment generally and in combatting climate change, the risks to irreplaceable ancient woodland and their surrounding habitats, the risks to the Bridgewater canal and its surrounding habitat, risks to other important woodland that form part of The Mersey Valley Timberland Trail, the aesthetic damage to woodland walks by blocking them in with housing on all sides, easy access for the **largest number of people to open countryside** and stunning landscapes, the public amenity factor in terms of health and wellbeing by having open countryside on their doorstep, the negative impact development at Option 2 will have on the character and setting of the area, the negative visual impact such development would have on the character and setting of The Timberland Trail and Stockton Lane, and the negative visual impact such development would have on the two conservation areas in Grappenhall.

s) Option 4 would allow Grappenhall Village conservation area to remain in a more sensitive setting.

t) All of the four Options will require infrastructure and new amenities. It is flawed to assert that Option 2 is preferred because it can latch onto already overburdened services in Stockton Heath and is not a valid reason for preferring Option 2.

u) We submit that “rounding off” existing development, the fact that the proposed SEWUE happens to be land owned by Homes England and the conclusion that Option 4 performs “less well” as green belt are not sufficient factors to render the current plan “sound” when balanced against the reasons not to build there stated in this document.

u) We do wonder whether the criteria for assessing green belt land is fit for modern purposes, in terms of serving the community. If you look at the green belt assessments of the various parcels of land in South East Warrington ahead of the last Local Plan they are measured against criteria such as their ability to prevent urban sprawl - and so the *central*, easily accessible on foot and most attractive green areas score poorly - and the areas further out towards the motorway (that no one walks to / around) score better as green belt (because it is seen as a stronger border to prevent urban sprawl). On that basis it can be said that the current SEWUE is saving the ‘strongest’ performing green belt land. But the upshot of this is that the lovely open countryside and woodlands / fields / canals / brooks people enjoy walking through be subject to mass development and what will remain is landscape only enjoyable from a car as you enter the edges of town from the motorways.

An idea of what Option 4 could look like

Brindley Woods

3.23 If there is to be new development in South East Warrington we would propose that this is undertaken carefully and with the appropriate parties. A new development in a slightly separate location could offer a really interesting, sustainable and attractive settlement – with an opportunity to carefully masterplan it with architects and masterplanners with the requisite skill and expertise in development in sensitive, semi-rural locations.

3.24 A walkable “destination village” that enhances the natural environment, rather than detracts or simply leeches from it to sell itself could be planned – with its own cohesive architecture, unique features and landmarks. With fresh involvement from appropriate architects, masterplanners and developers there is no reason why it would not be possible to create a place that for once, *adds* to the fabric of the environment.

3.25 Create neighbourhoods. We love the alleyway steps of Edinburgh and the winding lanes of York, the village pubs we go to for Sunday lunch and the Victorian streets and squares in our historic cities. Yet we don’t seem to create these experiences in our built environment now. We’ve chosen identikit housing surrounded by tarmac - some of which have had the fortune to be proximate to previously created distinctive villages and attractive landscapes, and some have not.

3.26 A new “destination village” could have characterful roads, not obliterating the landscape but enhancing it, with houses in keeping with the local area and cycle paths and trails taking you to the nearest retail and social amenities. Boxy housing estates engulfed in tarmac would be rejected and instead, quirky pathways and streets would be developed, encouraging active travel to the nearby woodland, wildlife habitats and the stunning landscape that has been saved. It is perhaps worth pointing out that often, **objection to new housing developments is because the public are aware that this will likely entail bland, characterless housing estates.**

3.27 The new settlement could have a name that gives it a sense of history and place - connected to landmarks and architecture that have stood the test of time (they truly built sustainably back then). An idea would be **Brindley Woods**, after the engineer and designer, James Brindley, who worked on the establishment of The Bridgewater Canal and designed a number of bridges in the area, including Lumb Brook Bridge, Church Lane Bridge. Halfacre Lane Bridge and Pickering’s Bridge.

3.28 There would be farms and agricultural land in close proximity – which could provide educational and practical opportunities for learning about food production. The protected ancient woodlands would be available for exploration from a recreational and outdoor centre that housed the scouts and guides and had links to Green Angels and The Land Trust.

3.29 The schools could have links to Incredible Edible and have agriculture and horticulture / commercial horticulture classes / courses. They could have a kitchen garden / allotments for which pupils are responsible, the high school could even operate a small farm shop. It would have strong links with The Woodland Trust, Cheshire Wildlife Trust, local farms and farm shops

and would be invaluable in teaching future generations about sustainability and our environment.

3.30 There could be a village centre that actually has character and quiriness, small shops, community hubs / an arts theatre and playing fields and parks – but in the setting of open countryside and woodlands – and the Bridgewater Canal. The village centre could have a square and traditional buildings surrounding it – with shops and cafes on the ground floor and apartments above them to maximise the number of homes.

3.31 The Brindley Woods community could assist in the stewardship of the covert on the site, ensuring it remains preserved.

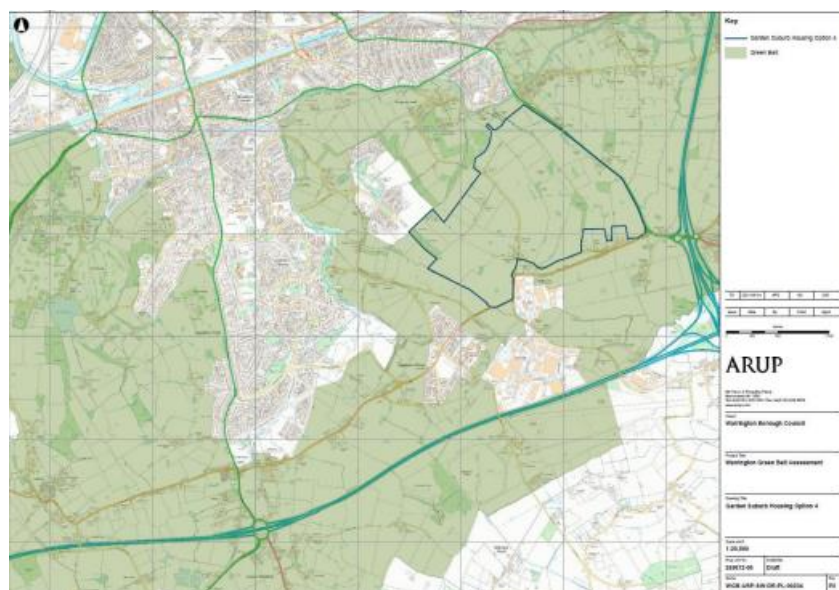
3.32 It would be possible to walk and cycle to nearby Grappenhall and Thelwall – to established shops, pubs, restaurants, takeaways and other services that still need our custom.

3.33 There would be easy access to well established walking routes, (including The Timberland Trail), ancient woodlands, wildlife sites and stunning landscape views down to the Bridgewater Canal.

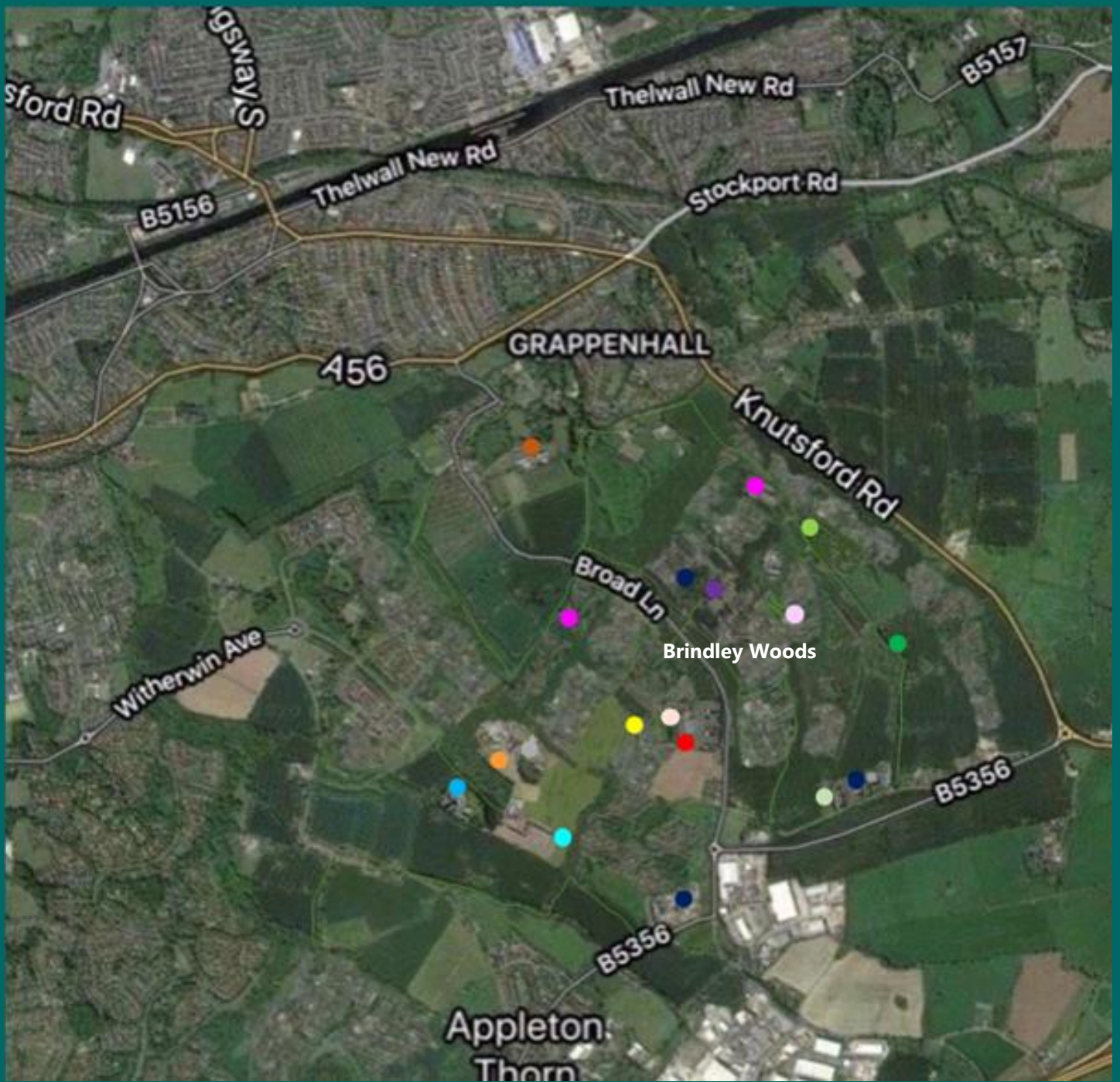
3.34 There would be no need to attempt to mitigate harm to irreplaceable ancient woodlands by installing a 'playing field' or 'planting some new trees' or "strengthening wildlife corridors".

3.35 We have set out below indicative maps and ideas of what the new village could look like if located at Option 4, although these are very much broad ideas and it would be for the local community to have their say in what the area could and should look like.

3.36 We appreciate that this is a response to the Local Plan, but given the documentation annexed to the PSV 2021 includes the South East Warrington Urban Extension from Homes England and partners, with indicative maps, overview masterplans and images of the type of housing and architecture they envision, we thought it would be useful to add some alternative design and architecture ideas.



Indicative Plan of Alternative SEWUE



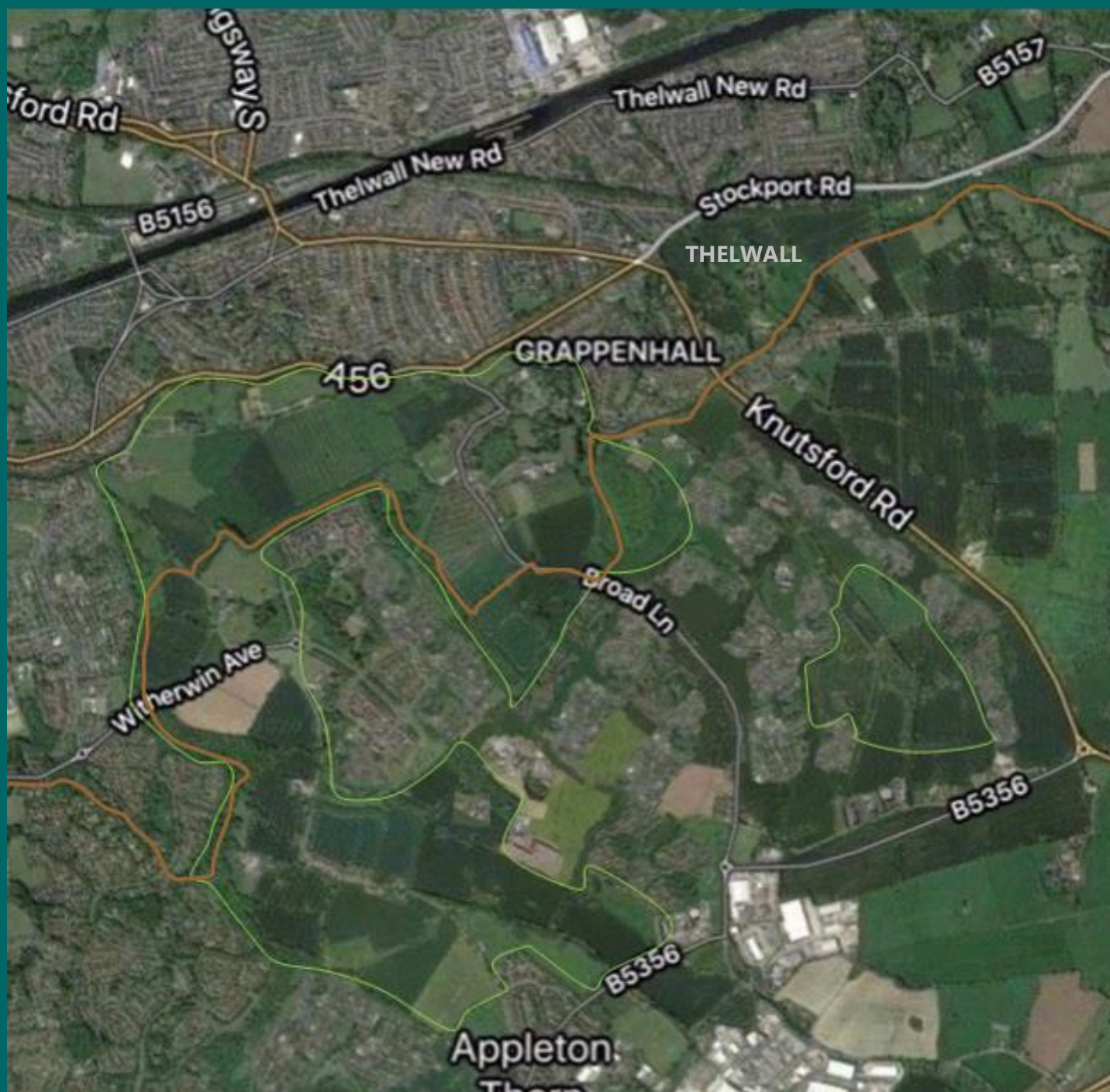
KEY

	Village centre
	Primary school
	High school
	Park
	Planted maze
	Skate park
	Community Hub / café
	Arts centre
	Medical centre
	Playing field / sports ground
	Outdoor recreation and scout / guide/ ranger centre
	Allotments
	Convenience store
	Recycling centre
	New and existing public footpaths
	St Wilfred's Retirement Village

3.37 This is an indicative map showing what the new village could look like. It is not intended to be any kind of masterplan, simply an impression of how development could be located in the area, preserving key natural elements – for example Barry's Covert and nearby ponds. We have added in the already consented developments in the area so that it is possible to gain an idea of what the whole area would look like if Option 4 were chosen.

3.38 With this Option, there remains open countryside for all of the existing settlements, and indeed new settlements; breathable space, and protections of the key habitats in the area including ancient woodland, other woodlands, The Bridgewater Canal and The Mersey Valley Timberland Trail.

Option 4 with protected green space and biodiversity sites, The Mersey Valley Timberland Trail and The Bridgewater Canal with protected surrounding habitats, breathable space and stunning landscape for new and existing settlements



Land Adjacent to the A50



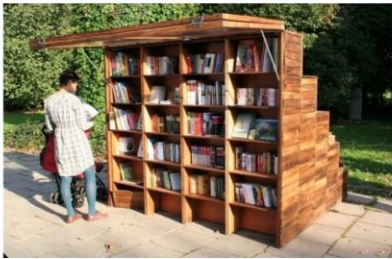
Ideas for architectural style and setting #1



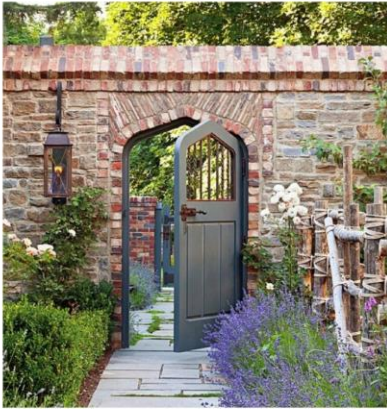
All of these homes are modern developments. We are delighted to say that two of these images are affordable housing, one of which is in Warrington.



Brindley Woods / Grappenhall Heys community ideas #1



Brindley Woods / Grappenhall Heys community ideas #2



4. Grappenhall Hall School: St Wilfrid's Retirement Village

4.1 Sustainability includes thoughtful and attractive homes for older residents as we see an increasingly ageing population. We must have a sufficient number of suitable homes for all demographics in our future plans. There are those who may wish to downsize but are still independent and don't want the option of staying in their own house versus a room in a nursing residence. We would love to see a retirement *village* in the area - and we propose the site of Grappenhall Hall School.

4.2 It would of course be lovely to have the site as a Walton Gardens style country park with refurbished period building, as was the original PSV 2019 plan – but as the PSV has been revised down there may be the question of who is going to pay for its renovation. Who is going to maintain it? How would it make sufficient money to pay for its own upkeep?

4.3 There has also been the suggestion that it could be a hotel - but given the majority of the most established, most frequented and most scenic country walks and landscape would disappear into the middle of a large housing estate under the proposed plan - who is going to be attracted there as a tourist?

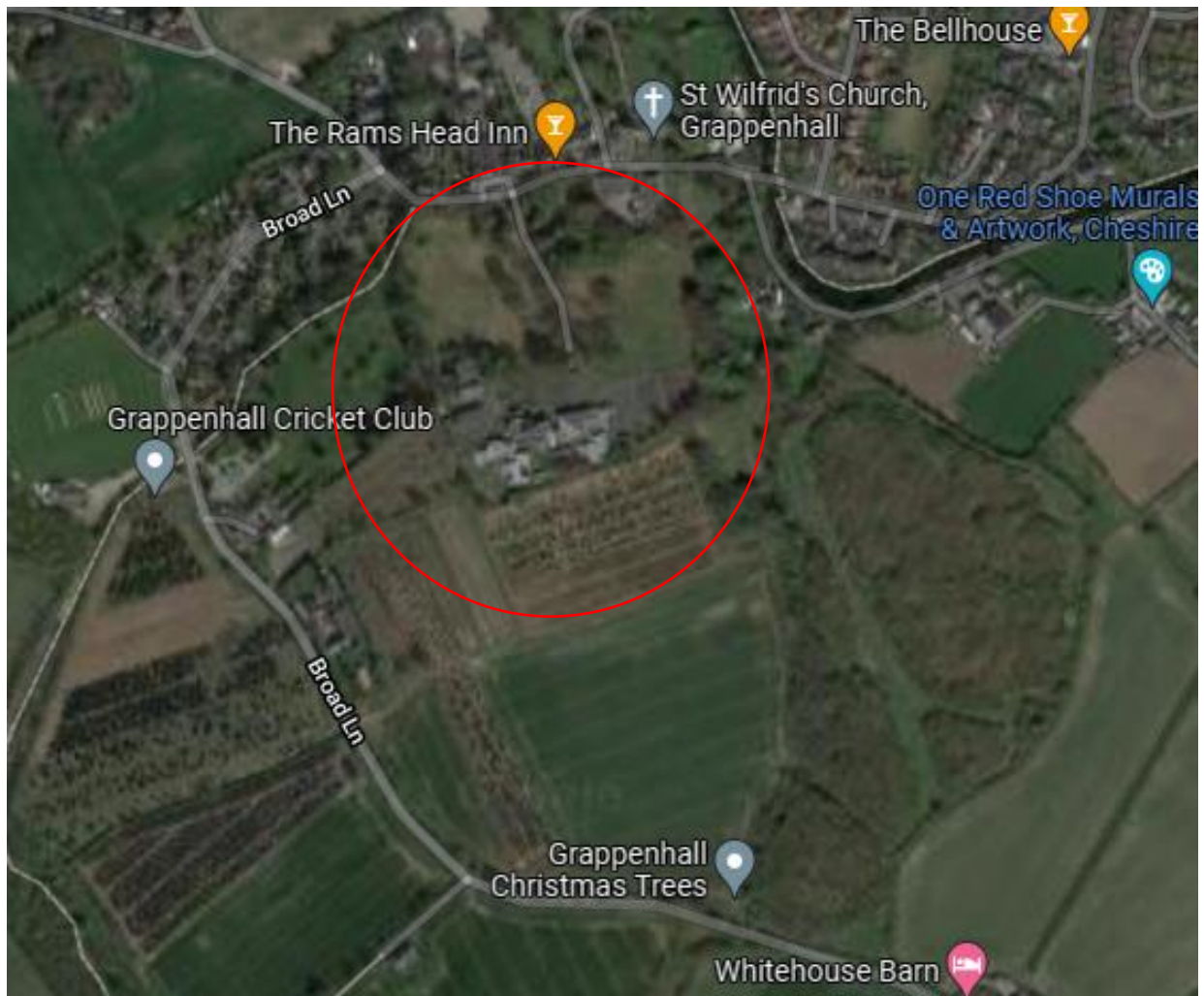
4.4 It is understandable that local residents may not want anything done on the site - but what is the alternative? It would be terribly sad to leave it empty for years so that it falls into further decay and has to be demolished.

2.41 There are now a number of retirement "villages" being created across the UK. These often centre around a period building that becomes the social focal point of the retirement village. They also have on site shops and arrange shopping trips for residents. They often have their own lounge bar, restaurant, library and café too.

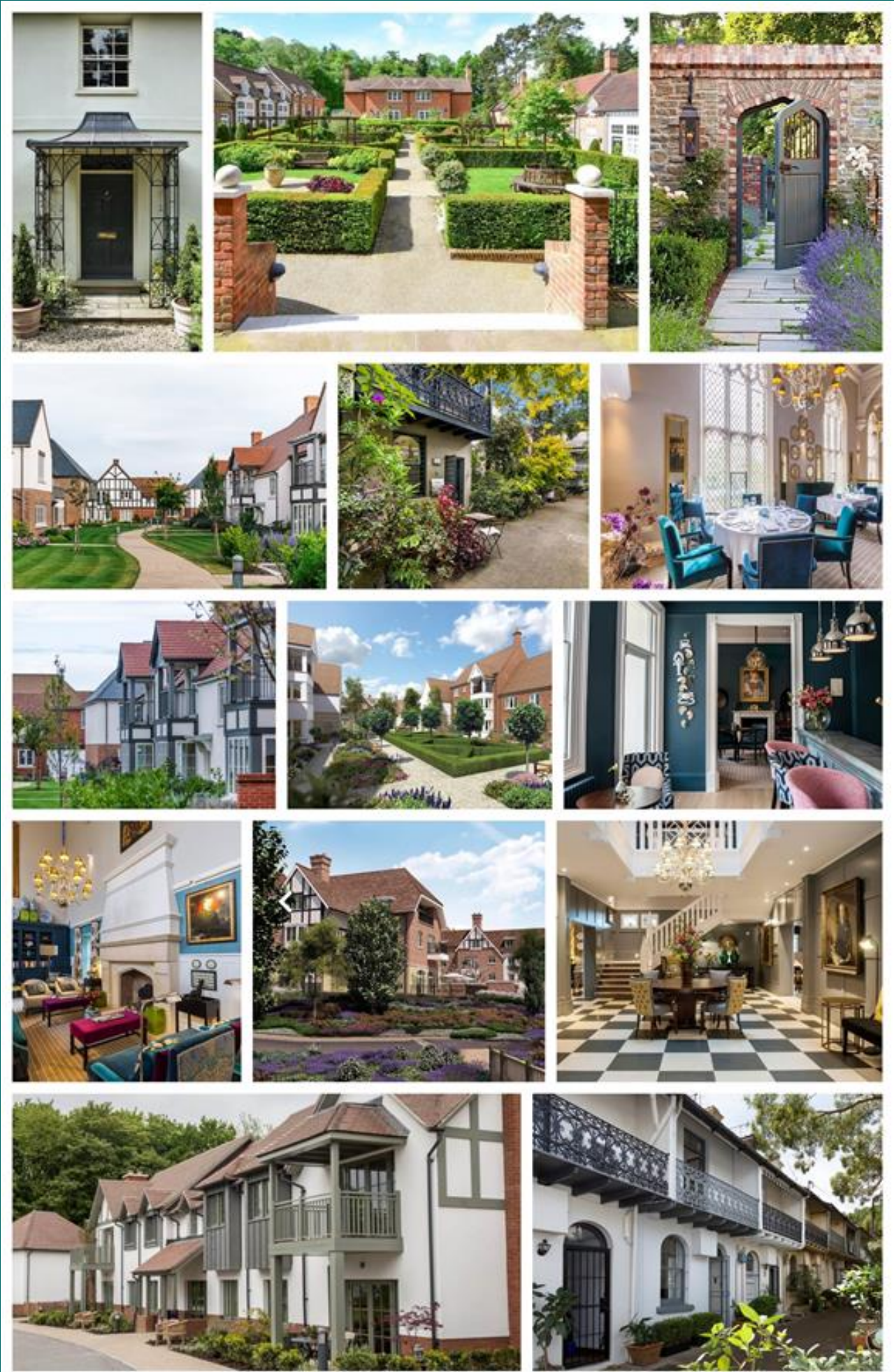
4.5 We are conscious of the fact that the site is in Grappenhall Village conservation area, and it would be imperative that any development was undertaken sensitively and in character with its surroundings. But we think bringing this lovely area and architecture back to life, for use as a retirement village would be a lovely way to provide homes in a beautiful, quiet and safe setting. We would expect there to be fewer cars and residents would have easy access to the nearby woods and The Bridgewater Canal, as well as two great pubs in the village.

4.6 We understand that Warrington Borough Council own this land and we wondered if they would consider this as an option?

Current Site of Grappenhall Hall School



St Wilfrid's Retirement Village ideas



5. South East Warrington Employment Area

5.1 Again, it remains for Warrington Borough Council to establish that there are “exceptional circumstances” for removing land from the green belt.

5.2 Should they establish this, we would submit that another distribution site in Warrington is a retrograde step that will ultimately not be a source of sustainable future employment. It will also lead to a substantially increased level of HGV traffic and with it - increased pollution. Warrington has a considerable number of warehousing and distribution sites already and to be considering adding yet another one as a source of employment does not seem to us to be a strategy that will future proof Warrington’s economy. It’s kind of putting all your employment eggs in one basket.

5.3 It is not clear what employment and career progression opportunities would arise from more distribution warehouses and logistics sites for people of Warrington. This seems like a narrow field. Surely we should be considering opportunities for the jobs of the future while we have the temporal and literal space in which to do so?

5.4 Mass construction of warehousing and distribution sites that may have to be demolished in twenty years’ time to make way for businesses more in step with the future of the UK economy will impact the environment and incur unnecessary cost.

5.5 In terms of sustainability and the fight to combat climate change any distribution sites should be near rail or water transport infrastructure in any event.

5.6 In terms of employment and the economy, the “elephant in the room” is that it appears to be very difficult to attract business and investment to Warrington town centre. This may well be because of its currently rather dilapidated appearance in many areas, which Warrington Borough Council are rightly addressing. It may well also be that the town centre can seem quite desolate; save for weekends the centre is quite empty of people. Again, Warrington Borough Council are planning to change this by the development of thousands of homes in the town centre, which is brilliant and much needed. However, while this may well increase *some* footfall at certain times it remains the case that there is very little commercial activity in the town centre during the day time. Businesses just don’t seem to want to establish themselves there. Perhaps the main reason is the physical (and therefore psychological) barriers to getting into Warrington town centre. Having asked some business owners would they consider setting up offices in the town centre the general response is that the traffic congestion and road systems are too prohibitive and would be unattractive to business visitors. The psychological prospect of battling one’s way through outdated road systems to reach one’s business is just too offputting.

5.7 This means that Warrington compares unfavourably with Liverpool and Manchester because not only do these cities have thousands of residents living in the centre, it is also filled with businesses and therefore people – who populate the cities’ bars, restaurants and shops during the day and weekday evenings. People finish work and then meet for food or drinks

before leaving for home. Warrington does not have this – the town centre after 5pm is pretty silent during the week, and barely better at lunchtimes.

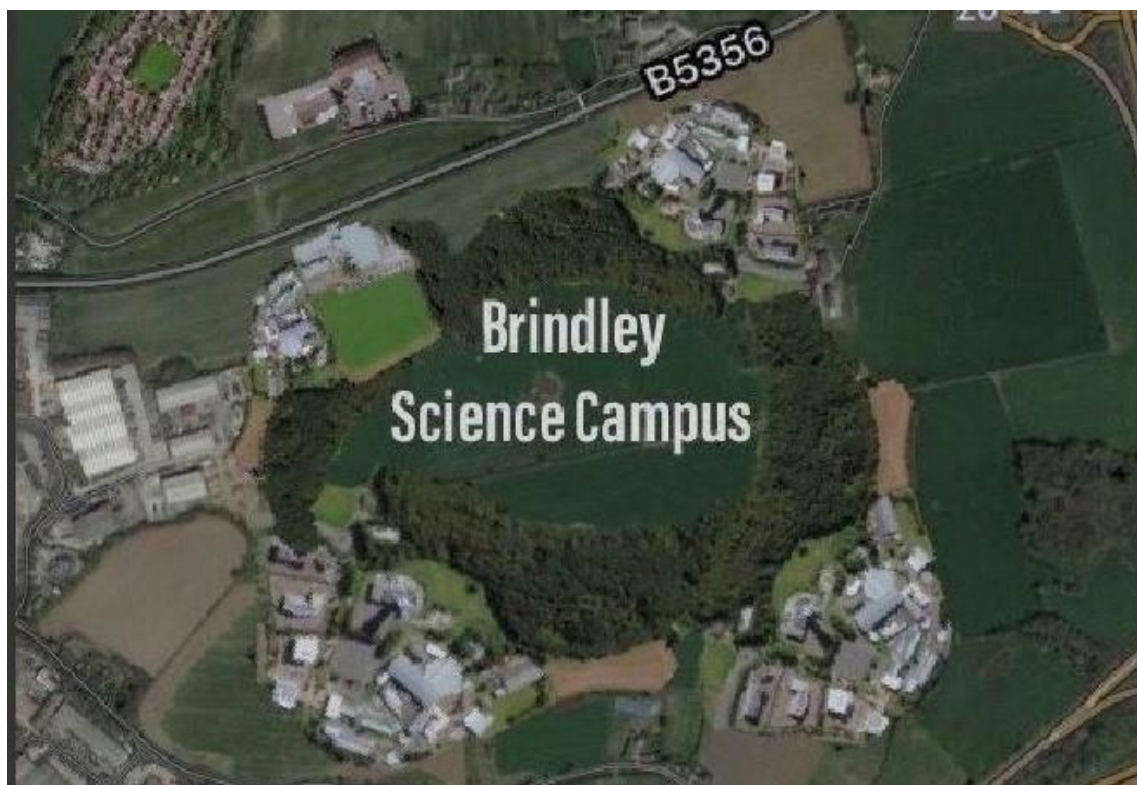
5.8 While it is important to continue to try and attract business to the town centre it may be better to focus on establishing the town centre as a lovely place to live, with plenty of green space and quirky shops and cafes and bars for people living in the centre to enjoy, and which will attract the public from further afield.

5.9 The commercial sites that are thriving are those such as at Birchwood and Daresbury, which are in step with fields of employment and enterprise most likely to dominate in the future.

5.10 We would therefore propose that if an employment site is to be established in South East Warrington it would more sensible to invest in emerging areas that will be significant for the economy in twenty or thirty years' time. We could add to what could become a nationally recognised science and technology corridor – offering jobs in science, research and development and green manufacturing.

5.11 It could also offer commercial space to those businesses who perhaps cannot afford the prohibitive costs of central Manchester, and who would travel to South Warrington, avoiding the need to access the town centre. It could be home to small media or digital companies, who wish to be near to Manchester and Salford but cannot afford the leasing costs. There could be a gym and outdoor sports centre here, too.

Such an employment site would also be within walking and cycling distance of the Option 4 SEWUE site.



6. Transport

6.1 There is a significant problem with planning for transport links from South Warrington due to the three waterways that must be crossed to reach the town centre. It is therefore appreciated how difficult this must be logistically when planning strategies for development.

6.2 We are also certain that many possible routes will have been considered over the years with no easy solutions; certainly not without considerable spending on infrastructure.

6.3 We note that the possible provision of trams has been considered and may not have been ruled out as an option.

6.4 In this regard we wondered if Warrington Borough Council have considered a tram-train link from South Warrington to Manchester to the east and linking west to Frodsham, Chester and so on? We are sure they have, but we just wanted to propose it again, as this could be a way of offering public transport links to cities and towns that not only will avoid the waterways, but could break that “psychological” link of avoiding travel from Manchester to Warrington, which could in turn mean there is an attractive proposition to those who may wish to consider commercial investment in South East Warrington at an employment site.

6.5 The tram-train line could link with South Manchester either via Partington / Carrington – residents there are subject to potential mass development and new highways under their draft Local Plan (and more distribution and warehousing sites). Residents there have proposed tram links as an alternative to new highways.

6.6 Or the tram-train line could link with the existing line from Altrincham and reach South Manchester this way. This might be an opportunity to improve links to cities and other towns from South Warrington, address the problem of the three waterways, AND encourage people to use public transport without getting in a car.

6.7 We have a railway station at Birchwood, a large shopping centre, Risley Moss and successful business and science parks, but without crossing the Thelwall viaduct it is not that easy to access from the south. This is obviously in large part due to the waterways. We need to better connect the north and south on the eastern side of the town, so that the two halves feel less disparate. We note that the PSV 2021 / public transport plan provides for bus services linking South East Warrington to Birchwood, but these involve crossing the swing bridge at Latchford and having to battle traffic at Kingsway before travelling through Fearnhead and finally reaching Birchwood.

6.8 We wondered if there was a way to plan for public transport travelling east instead? It is a much faster and more direct route than negotiating Latchford and crossing the A57.

6.9 Better transport on the east side of South Warrington to Birchwood Station may ease congestion as an alternative to fighting one’s way into town to Warrington Central Station.

7. Peel Hall



7.1 We do not propose to offer technical objections to development at Peel Hall as we are aware that there are already those who have specific expertise and knowledge of the history of the site and would offer far stronger arguments than us.

7.2 However, we wish to offer our support to those working to save this vital green space and agree that this open space should be permanently protected for the community. In an area that is already extremely densely populated this offers residents accessible “countryside next door” – a rare commodity in this area of North Warrington. It also offers an important buffer from the motorway - indeed, given its proximity to the motorway we find it extraordinary that such mass development would be considered there.

7.3 Whilst we note that the Peel Hall site is at present only deemed “developable”, this does not provide the certainty the community need that it will be permanently protected as green space.

Thank you for taking the time to read this document.

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