

## *Comments and Objections re Local Plan Issues and Options (Regulation 18) Consultation*

I object to the growth development options for major housebuilding FR01, FR02 and FR03 near Frodsham and HEL01 near Helsby proposed by Cheshire West and Chester Council. I believe that building thousands of new houses here would permanently change the landscape and setting of these two neighbouring communities which are bounded by protected countryside and Green Belt land. That land is valuable in terms of the environment, wildlife and the character of the local area and prevents the two settlements merging via ribbon development along the connecting land. Such development would break national planning regulations and overload the existing infrastructure which is already bursting at the seams.

My case against these developments is set out below, following the section and question numbers from the Local Plan Issues and Options (Regulation 18) Consultation.

### **SECTION 5: Spatial Strategy**

#### **SS9**

##### **Question:**

*Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?*

##### **Answer:**

NO, I am not aware of any circumstances that have changed that would justify Green Belt release.

#### **SS11**

##### **Question:**

*Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:*

- a. Option A - Retain the Green Belt*
- b. Option B - Follow current Local Plan level and distribution of development*
- c. Option C - Sustainable transport corridors*
- d. None of these*

##### **Answer:**

Option A – RETAIN THE GREEN BELT

#### **SS14**

##### **Question:**

*Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?*

##### **Answer:**

YES

#### **SS16**

##### **Question:**

*Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?*

##### **Answer:**

NO

#### **SS17**

##### **Question:**

*If you do not feel that Option B is an appropriate spatial strategy option, are there any changes that you could suggest?*

##### **Answer:**

Option A

**SS18**

**Question:**

*Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?*

**Answer:**

NO. Just because a small town or village has a rail station does not mean that the infrastructure and services of the area can sustain a huge influx of new residents.

**SS19**

**Question:**

*If you do not feel that Option C is an appropriate spatial strategy option, are there any changes that you could suggest?*

**Answer:**

Option A

**SS41**

**Question:**

*Which of the identified potential growth areas around Frodsham do you consider to be the most suitable?*

**Answer:**

*NONE OF THESE GROWTH AREAS ARE SUITABLE BECAUSE THEY ARE ALL GREEN BELT AREAS.*

I voted to accept the Frodsham Neighbourhood Plan which included identified sites within the town borders to meet the housing need of 250 homes by 2030. None of these sites are on Green Belt land. The referendum of local residents voted in favour of the plan and it was adopted just last year.

Quotes from the Frodsham Neighbourhood Plan:

<https://frodsham.gov.uk/wp-content/uploads/2024/09/FNP-Referendum-version-comp.pdf>

*“An independent external report (Strategic Environmental Assessment (SEA) (September 2023)) indicates that FRODSHAM HAS THE POTENTIAL TO MEET THIS HOUSING TARGET UP TO 2030 WITHOUT THE NEED TO BUILD ON GREENBELT LAND, in line with the community's wishes.”*

*“This is in line with Policy STRAT 9 of the Local Plan (part One) that states that the general extent of the North Cheshire Green Belt will be maintained. “In order to meet future development needs to 2030 and to promote sustainable patterns of development, IT HAS BEEN IDENTIFIED THAT ONLY IN THE CASE OF CHESTER ARE THERE EXCEPTIONAL CIRCUMSTANCES TO AMEND THE GREEN BELT.”*

The National Planning Policy Framework (NPPF) only allows Green Belt development in exceptional circumstances and, according to the Local Plan (Part One) of Cheshire West and Chester Council, this only applies to Chester – not Frodsham or Helsby.

In addition, the area FR03 on Map 5.10 (Frodsham Growth Options) in conjunction with the area HEL01 on Map 5.11 (Helsby Growth Options) connect *all* the Green Belt land between Frodsham and Helsby. Development on both of these sites would mean the two towns would merge into one another, becoming an urban sprawl, destroying the appearance, setting and character of both Frodsham and Helsby and the Frodsham Hill and Helsby Hill Areas of Special County Value (ASCV).

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This is in direct contravention to the NPPF (section 13, paragraph 143) and a key reason for maintaining the Green Belt. The countryside must be safeguarded from encroachment, brownfield sites *must* be prioritised for development before any Green Belt land is lost.

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: *THE ESSENTIAL CHARACTERISTICS OF GREEN BELTS ARE THEIR OPENNESS AND THEIR PERMANENCE.* (NPPF section 13, paragraph 142).

### **SS42**

#### **Question:**

*Do you have any further comments about any of the potential growth areas identified around Frodsham?*

#### **Answer:**

Hob Hey Wood, an ancient woodland and site of biological interest, is adjacent to FR01 and FR02. The wood is full of wildlife and used by many local people to benefit from the natural environment, away from built up areas. Being surrounded by housing would have a huge ecological impact on the sustainability of the woodland and the species which inhabit it. Wildlife corridors would be disrupted, not just by the housing but by the numerous new residents and their pets, plus pollution and light pollution would increase.

As per the Helsby Neighbourhood Plan 2015 – 2030 (2.2.1) Helsby, Frodsham and Lordship Marshes are designated as a Local Wildlife Site (formerly known as a Site of Biological Interest); an Area of Significant Local Environmental Value (ASLEV) (Vale Royal Local Plan Policy NE12), and are part of the Mersey Estuary Zone (Vale Royal Local Plan Policy NE18). They are a significant landscape feature in themselves, and are of international importance to migrating and wintering birds.

This is a nationally important ecological area and the wildlife would be adversely impacted by FR03 and HEL01 which would be close to these marsh areas (as per Map 10.1 'Frodsham settlement area and key constraints' in this consultation)

The policies of the Vale Royal Local Plan protect areas from development that would adversely affect the features which gave rise to their designation. The gap between Helsby and Frodsham South east of the A56 was designated by this plan as an ASLEV. This is exactly where FR03 and HEL01 are positioned, building here would damage the landscape.

The Cheshire West and Chester Council Local Plan Part 2 (DM44) sets out strict protections for these ecological sites. In my opinion, the growth sites identified around Frodsham should not be built on to ensure the protection of the wildlife and ecosystem in the area. Development would fragment habitats, disturb protected species and breach Council and National commitments to maintain biodiversity.

Additionally, per Section 10, Map 10.1 'Frodsham settlement area and key constraints' in this consultation, Cheshire West and Chester have identified that there is a Flood Risk Zone running directly through FR03 and HEL01. Building on this area would exacerbate this risk and should not go ahead.

### **SS43**

#### **Question:**

*Are there any constraints, including infrastructure provision, that should be considered for Frodsham when developing the new Local Plan?*

#### **Answer:**

Traffic through Frodsham is regularly gridlocked when there are problems on the M56 motorway. The weaver viaduct carries over 110,000 vehicles every day and vehicles consistently divert through Frodsham and Helsby when there are roadworks, collisions or closures.

Adding the hundreds of extra vehicles from the growth area developments would aggravate this already awful situation. Plus, the construction vehicles used during the development will add to the extra traffic and cause more hold ups.

It is not just the A56 which suffers, all the surrounding lanes and local smaller roads are affected as SatNavs direct people to try to avoid the traffic build up and consequently cause more blockages and havoc. This is a nightmare scenario for any emergency vehicles trying to get through and more traffic will put more lives at risk.

Increased traffic congestion also increases pollution which will adversely affect the health of residents and people stuck in their vehicles.

To be able to support the influx of new residents and associated traffic the existing infrastructure would need to be upgraded significantly at extortionate expense. Unfortunately, there are no straightforward solutions for creating additional access routes to the existing 3 primary roads into Frodsham or to bypass Frodsham or to add another bridge over the River Weaver and canal in order to alleviate the dreadful traffic problems which are experienced in the area.

The population of Frodsham is currently around 9000. Constructing 2000 new homes could increase the population by around 50%. The GP Practice already struggles to see and care for the existing population of the town, an increase in new patients of that magnitude would put both the GP Surgery and the health of their patients at risk.

Local schools are close to full capacity and it is difficult to get an NHS Dentist appointment in the town.

There is no confirmed Infrastructure Delivery Plan to fix the above problems, Local Plans are required to set development *ONLY WHERE THERE IS THE INFRASTRUCTURE TO SUPPORT IT.*

Additionally, per Section 10, Map 10.1 'Frodsham settlement area and key constraints' in this consultation, Cheshire West and Chester have identified that there is a Flood Risk Zone running directly through FR03 and HEL01. Building on this area would exacerbate this risk and should not go ahead.

#### **SS44**

##### **Question:**

*Which of the identified potential growth areas around Helsby do you consider to be the most suitable?*

##### **Answer:**

*NONE OF THESE GROWTH AREAS ARE SUITABLE BECAUSE THEY ARE ALL GREEN BELT AREAS.*

The National Planning Policy Framework (NPPF) only allows Green Belt development in exceptional circumstances and, according to the Local Plan (Part One) of Cheshire West and Chester Council, this only applies to Chester – not Frodsham or Helsby.

In addition, the area HEL01 on Map 5.11 (Helsby Growth Options) in conjunction with the area FR03 on Map 5.10 (Frodsham Growth Options) connect *all* the Green Belt land between Helsby and Frodsham.

Development on both of these sites would mean the two towns would merge into one another, becoming an urban sprawl, destroying the appearance, setting and character of both Helsby and Frodsham and the Helsby Hill and Frodsham Hill Areas of Special County Value (ASCV).

This is in direct contravention to the NPPF (section 13, paragraph 143) and a key reason for maintaining the Green Belt. The countryside must be safeguarded from encroachment, brownfield sites should be prioritised for development before any Green Belt land is lost.

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The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: *THE ESSENTIAL CHARACTERISTICS OF GREEN BELTS ARE THEIR OPENNESS AND THEIR PERMANENCE.* (NPPF section 13, paragraph 142).

### **SS45**

#### **Question:**

*Do you have any further comments about any of the potential growth areas identified around Helsby?*

#### **Answer:**

As per the Helsby Neighbourhood Plan 2015 – 2030 (2.2.1) Helsby Frodsham and Lordship Marshes are designated as a Local Wildlife Site (formerly known as a Site of Biological Interest); an Area of Significant Local Environmental Value (ASLEV) (Vale Royal Local Plan Policy NE12), and are part of the Mersey Estuary Zone (Vale Royal Local Plan Policy NE18). They are a significant landscape feature in themselves, and are of international importance to migrating and wintering birds.

This is a nationally important ecological area and the wildlife would be adversely impacted by HEL01 and FR03 which would be close to these marsh areas (as per Section 10: Map 10.1 'Frodsham settlement area and key constraints' in this consultation)

The policies of the Vale Royal Local Plan protect areas from development that would adversely affect the features which gave rise to their designation. The gap between Helsby and Frodsham South east of the A56 was designated by this plan as an ASLEV. This is exactly where HEL01 and FR03 are positioned, building here would damage the landscape.

The Cheshire West and Chester Council Local Plan Part 2 (DM44) sets out strict protections for these ecological sites. In my opinion the growth sites identified around Frodsham should not be built on to ensure the protection of the wildlife and ecosystem in the area. Development would fragment habitats, disturb protected species and breach Council and National commitments to maintain biodiversity.

Additionally, on Map 10.1 'Frodsham settlement area and key constraints' in this consultation, Cheshire West and Chester have identified that there is a Flood Risk Zone running directly through FR03 and HEL01. Building on this area would exacerbate this risk and should not go ahead.

Helsby has ongoing development of 120 homes on Chester Road and 240 homes on Cable Drive which have yet to be completed. This is already a sizeable new development for Helsby without the additional growth areas.

### **SS46**

#### **Question:**

*Are there any constraints, including infrastructure provision, that should be considered for Helsby when developing the new Local Plan?*

Traffic through Helsby is regularly gridlocked when there are problems on the M56 motorway. The weaver viaduct carries 112,000 vehicles daily and vehicles consistently divert through Helsby and Frodsham when there are roadworks, collisions or closures.

Adding the hundreds of extra vehicles from the growth area developments would aggravate this already awful situation. Plus, the construction vehicles used during the development will add to the extra traffic and cause more hold ups.

It is not just the A56 which suffers, all the surrounding lanes and local smaller roads are affected as SatNavs direct people to try to avoid the traffic build up and consequently cause more blockages and havoc. This is a nightmare scenario for any emergency vehicles trying to get through and more traffic will put more lives at risk.

Increased traffic congestion also increases pollution which will adversely affect the health of residents and people stuck in their vehicles.

To be able to support the influx of new residents and associated traffic the existing infrastructure would need to be upgraded significantly at extortionate expense. Unfortunately, there are no straightforward solutions for creating additional access routes to the existing roads into Helsby or to bypass Helsby or to add another bridge over the River Weaver and canal in order to alleviate the dreadful traffic problems which are experienced in the area.

The GP Practice already struggles to see and care for the existing population of Helsby, an increase in new patients from 1000 new homes would put both the GP Surgery and the health of their patients at risk. Local schools are at full capacity, with local children already being sent out of the area to start school and it is difficult to get an NHS Dentist appointment in the town.

There is no confirmed Infrastructure Delivery Plan to fix the above problems, Local Plans are required to set development *ONLY WHERE THERE IS THE INFRASTRUCTURE TO SUPPORT IT*.

Additionally, per Section 10, Map 10.1 'Frodsham settlement area and key constraints' in this consultation, Cheshire West and Chester have identified that there is a Flood Risk Zone running directly through FR03 and HEL01. Building on this area would exacerbate this risk and should not go ahead.

## **SECTION 10: Frodsham**

### **FR1**

#### **Question**

*Do you agree with the suggested policy approach towards Frodsham, as set out in FR 1 'Frodsham' above? If not please suggest how it could be amended?*

#### **Answer**

Frodsham should be identified as a *historical* market town in the new Local Plan settlement hierarchy.

As per my responses to Section 5 Spatial Strategy options above, I DO NOT AGREE that Green Belt land should be released for development around the town.

The policy approach should reflect the objectives and projects identified in the Frodsham Neighbourhood Plan, which was voted for and accepted by the local residents – this was just last year and nothing has changed so significantly that this needs to be changed.

In particular, in support of my arguments against releasing Green Belt land, I would like to highlight the following from that plan (as per FR1):

- ensure new development *respects the character of Frodsham* in terms of design, materials and *SCALE*
- *protect the appearance, setting and character of the Frodsham and Helsby Hill ASCV*
- protect and enhance the network of accessible green and open spaces
- manage the potential impact on designated habitats sites