

Thornton Parish Council objections to DC/2021/00417

To Whom It May Concern,

We are writing to object to the proposed housing development off Holgate near Brooms Cross Road in Thornton. (DC/2021/00417) We believe that the application for housing at this site is grossly inappropriate for the area and would have a significant impact on the quality of life of residents currently living in the area. We are objecting on a number of grounds, including:

- Increase in already severe traffic congestion, including the poor placement of a new junction affecting traffic flow in an already regularly gridlocked area, and the inevitable increased use of residential roads as 'rat runs' and impacts on highway safety caused by this.
- The increase in air pollution levels around an already busy and polluted area, and associated impacts on the health of residents and on climate change.
- The loss of high quality 'best and most versatile' agricultural land, which should be protected from significant development.
- The loss of green space and impact on biodiversity, including overwintering birds which use the site, which is functionally linked to the nearby Ribble and Alt Estuary Special Protection Area.
- The impact on heritage assets, including the nearby grade II listed Brooms Cross monument, a historic bridleway and the none designated heritage asset Orchard Farm.
- Exacerbation of localised flooding risks caused by further significant development on a floodplain.
- Overuse of the site, with the number of proposed houses being excessive and entirely changing the character of what is currently a semi-rural area.
- Significant quality of life impacts for all local residents, and particularly loss of privacy, and effects of noise pollution and overshadowing impacting residents in close proximity to the site, on Holgate and Holgate Park.

Increased congestion and highways issues- The proposed development would exacerbate traffic congestion in an area which already has significant highway issues. The proposed new junction and traffic lights on Park View are in an area where the roads are already gridlocked on a regular basis, which can be clearly seen in the photographs submitted with other representations. The new development when completed would add upwards of 400 additional cars onto the local roads, and when taken in conjunction with already approved developments like Sundial Place in Thornton and the new estate in Altcar, this would have a drastic effect on roads which are already at capacity during peak travel times. The new set of lights and further reduced traffic flow would also encourage more people to use local residential roads such as Southport Road, Ince Road, Green Lane and Edge Lane/The Crescent as 'rat runs' to dodge the traffic, which would have an unacceptable impact on highway safety in an area where there has already been multiple road traffic accidents in the last year, and a fatality in late 2019. This would also defeat the purpose of the Thornton Corridor improvements made in 2018 as part of

the A565 Route Management Strategy, the stated aim of which was to encourage sustainable local travel, and divert traffic away from residential areas around Thornton. In addition, targets for emergency service response times are already not being met in the area, and a further increase in waiting times for critical medical attention could potentially cause serious injury or even death. Along with the increase in traffic the new housing would cause once completed, it has been predicted by the applicant that the development would take 54 months to complete, which represents a significant increase in local traffic for a lengthy and sustained period of time, with all of the heavy goods traffic, noise and dust pollution, congestion and wear to the local roads which this entails.

We would argue that this development discourages alternative forms of transport and encourages predominant use of private vehicles, and as such goes against Sefton MBC's own aims on sustainable and green development, and their declaration of climate emergency with the commitment to reduce carbon emissions and reliance on cars. Each property is planned to have 2 or in some cases 3 parking spaces, and the development as a whole does little to encourage alternative and sustainable methods of travel. We note that the Liverpool City Region comments on the application state the developments potential to be 'car dependent', and state that the junctions to the south and east of the site as currently conceived would not be safe and accessible to cyclists. Additionally, due to the lack of sufficient school places and GP practices in the area, along with insufficient bus provision and the distance from the site to access Merseyrail, it is inevitable that many new residents would end up travelling significant distances by car to access schools and medical treatment. The nearest Secondary school and both of the nearest primary schools to the site (Holy Family, St William of York, Forefield) are all operating at or over capacity, and lack of sufficient alternative transport options, and the distances involved, would inevitably lead to the use of cars to access schools further afield. Likewise the one GP practice in Thornton has upwards of 2200 patients, and new residents would likely have to travel further afield to access their GP. According to paragraph 109 of the National Planning Policy Framework, development should not be permitted if 'there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' We would argue that this application should be rejected on both grounds, due to the unacceptable impact on highways safety caused by the new junction and increased use of residential 'rat runs', and due to the local road network already being at capacity during peak times, especially when the additional traffic from other developments which have already been approved is factored in.

Increased air pollution- A new development of 206 houses, along with all of the increases in traffic detailed above, would also cause an unacceptable increase in already significant levels of air pollution and particulate matter around Thornton. While it may be the case that recent monitoring shows levels of particulate matter in the area as within limits, the fact remains that these levels still have significant detrimental impacts on human health, in particular for children or people with lung conditions such as asthma or COPD, and especially over prolonged periods living on or next to busy roads. In addition, once the cumulative effect of the proposed development along with other already approved local developments are taken into account, there is a significant risk of the levels of particulate matter reaching or exceeding the current

legal limits, and having a deleterious effect on the health of both current and potential residents in the process. In addition, with upcoming reviews of air quality targets, along with government statements of intent regarding these, it is probable that the legal thresholds will be lowered in the near future to match World Health Organisation targets. According to data from the Imperial College, (available at addresspollution.org.uk) the levels of PM2.5 and PM10 on Park View are close to World Health Organisation limits already and very much at a level where significant health impacts are well documented. This would affect both the existing residents, especially around Park View, Quarry Road, and Moor Lane, and the residents in the new housing, especially those facing onto Park View and Brooms Cross Road. There is also the question of climate change and our commitment to reducing carbon emissions, a duty which is underlined by Sefton MBCs declaration of climate emergency, which must now be backed with concrete action, and should include not further incentivising increased car use, nor creating pollution hotspots in Thornton, to the detriment of local residents and the climate as a whole.

Loss of agricultural land- The proposed site for development is a mixture of grade 2 and grade 3a agricultural land, all of which is classified as 'best and most versatile agricultural land', which according to the NPPF paragraph 171 and the government's 25 year environment plan published in 2018, should be protected from significant development where other sites (for e.g brown field and existing sites, or lower quality agricultural land) are available to meet housing needs. We do not believe that a need for significant development on high quality agricultural land has been demonstrated, as there are better suited sites in the area which could meet the housing needs laid out in the local plan.

Ecological impact- The proposed site is a significantly sized area of green space in an area where much of this land has already been lost, and lies within an SSSI risk zone. As stated, we believe that alternative sites should be considered before decimating yet more of our natural environment with a new development on this site. The proposed site is a haven for mammals, birds and plant life, and in particular is used by overwintering birds including pink footed geese, which are protected under the Wildlife and Countryside Act 1981. The nearby Ribble and Alt Estuary is designated as a Special Protection Area due to its populations of overwintering birds, and due to the proposed sites proximity to this area, it should be considered as functionally linked land, whereby development could have a knock on effect and damage the populations within the protected area. According to the supporting documents for the application, a survey on overwintering birds should have been submitted in February 2021, but as of the submission of this objection it is not visible on the Sefton MBC planning portal. This missing report forms part of the Habitat Regulations Assessment for the site, and without it, planning permission cannot be granted. In addition to overwintering birds, there are other nesting birds and mammals on the site, including sparrows and hedgehogs, which are both protected species. Additionally, In the available ecological surveys, no mention is made of any fungi found on the site whatsoever. One of the four species of fungi in the UK protected by the Wildlife and Countryside Act, the sandy stiltball, (*Battarrea phalloides*) is generally found on sandy soil around hedgebanks or deciduous trees, frequently associated with hawthorn and ash, both of which are present on the site. As such the site contains ideal habitat for this rare and protected

species, and fungi should have been covered in the ecological assessments which were carried out.

Impact on heritage assets- The proposed development is situated within close proximity to the Brooms Cross monument, a scheduled monument and grade II listed building. It would also require the diversion of a historic bridleway on Holgate, and the destruction of the non-designated heritage assets of Orchard Farm and the associated outbuildings and working well, which are of historic and archaeological significance. In the case of the latter, we would argue that it should be afforded a protected status, and a Building Preservation Order should be granted to allow the farm building to be retained regardless of any development which may be permitted on the site. With regards to Brooms Cross, development would further degrade the historical context of the monument and as such damage its heritage value through impact on the visual setting, removing more of the arable farmland of the area in place of urban sprawl, and diverting the bridleway which has been in place on the approach to the cross for centuries. This is in addition to the other historical heritage features around the site, including medieval lanes and tofts, and the encroachment of the site onto Ince Blundell, Homer Green and Lunt conservation areas.

Exacerbation of localised flooding- There have already been issues over a number of years with localised flooding in properties in the area, in particular around Runnells Lane and the new Sundial Place development, and surface flooding of roads around Thornton. Sefton Council have acknowledged the significant issues with flooding in Thornton in various reports, and the most recent flooding around Runnells Lane was worsened by the ongoing Sundial Place development, which is being built by the applicant for this site. Paving over yet another huge parcel of green land which can act as a natural drain for surface water and help to reduce flooding risks is short sighted, and will bring about a risk of floods for both the new residents on the site, and those living in the surrounding properties. Despite the site being classified in the lower risk flood zone 1, the government's own flood risk map shows that all of Holgate and the majority of Holgate Park are actually classified as high risk for surface flooding, and given this fact, we would argue that the paving of more land for the new site would cause an unacceptable increase in the risk of property damage from surface flooding around Holgate, and that the application should be rejected on this basis. Incidences of severe surface flooding have been increasing in number and severity in the local area for years, and with the increased levels of rainfall and periods of heavy rains due to climate change, this will only become more of an issue as time goes on, which should give serious reason for pause before rushing to approve new development in any flood zone.

Overuse of the site- Given the size of the site and its context within a semi rural setting, the number of houses proposed will completely change the character of the area, erode community cohesion and be out of keeping with its setting, representing an example of urban sprawl and an attempt to build as densely packed housing as possible to maximise profits, without regard for the impact on the area, or the quality of life of the residents.

Loss of amenity for residents in close proximity to the site- As already noted the proposed development would result in significant impacts to the quality of life of all residents in the local area, through the increased congestion, air pollution, noise, change of character to the area, flood risks and loss of green space. Specifically, residents of Park View, Quarry Road and Moor lane would be significantly impacted due to the worsening of already severe traffic issues on the roads where they live, as would the residents of nearby residential streets due to the highway safety issues and increased traffic caused by 'rat runs'. Additionally with regards to residents of Holgate Park in particular, some of whom are directly on the boundary of the proposed development, there would be a significant loss of privacy and light to their single storey properties by newly built two storey houses under the current plans. This part of the proposed development is out of keeping with the current properties in the area, and would be hugely detrimental to those residents currently living in Holgate Park, and this point alone should see the plans rejected in their current form. All residents in proximity of the site would additionally suffer noise and dust pollution throughout the projected 54 month development period. It is worth noting that the new residents moving in to the built houses would also bear the brunt of the issues surrounding pollution, traffic and flooding, and that the affordable housing in particular under the current plans seems to be clustered around the Brooms Cross Road and Park View sides of the development, where the pollution issues will be at their worst.

Errors in applicant submission- Lastly, there are a number of material errors contained within the design and access statement written by Grimster Planning on behalf of the applicant, and submitted in support of the development, which paint an inaccurate picture of the area. These include incorrectly listing 2 primary schools within close proximity to the site, one of which is Thornton Primary, which closed over ten years ago. Under local amenities, Londis on The Crescent and the Thornton Community Centre are both listed, when the former became Best One a number of years ago, and the latter has long been demolished. 'Thornton Sports Ground' is also listed under local amenities, which presumably refers to the Ramblers, private land which has recently been gated off to prevent access by the public. It is also implied that Merseyrail is easily accessible from the site, when in fact it is a significant distance away and there is no easily accessible rail travel from the site. All of these errors overstate the level of amenity in proximity of the proposed site.

To conclude, the proposals for development should be rejected for all of the reasons outlined above, most importantly due to the significant quality of life impact to the local residents, and the lack of sufficient road capacity and issues with highways safety which would result if this application was to be approved.

Thornton Parish Council.