

Local Plan  
Planning Policy and Programmes  
Warrington Borough Council  
East Annex  
Town Hall  
Sankey Street  
Warrington  
WA1 1HU



13 November 2021

Dear Sirs,

**REPRESENTATION/OBJECTIONS ON UPDATED VERSION OF WARRINGTON DRAFT LOCAL PLAN**

As part of the public consultation exercise on the above, we wish to strongly object to the following Local Plan proposals in south Warrington:-

- (i) The proposed rezoning (from existing Green Belt) to a major employment/logistics development to the east of Appleton Thorn – referred to as ‘South East Warrington Employment Area’; and
- (ii) The scale and extent of the proposed rezoning for major residential development (again in existing Green Belt) in the area referred to as ‘South East Warrington Urban Extension’.

Our grounds of objection concern:

- severe harmful impact on existing countryside character;
- loss of good agricultural land; and
- significant adverse traffic impacts on the local road network, with associated adverse impacts on the character and amenity of the area and the amenities of local residents.

Dealing with each of these rezoning proposals in turn.

**Proposed South East Warrington Employment Area**

Our objection grounds are as follows.

**1. Harmful landscape impact**

The purpose of the existing (2014) Local Plan is to protect existing open countryside and landscape character. The area proposed for rezoning not only lies within open countryside but is also on one of the most elevated sites in the Borough of Warrington.

A planning application has recently been submitted for a logistics development on this site (the Langtree application – still pending) and this usefully demonstrates the impact of this type of development in this location. The proposal would have a grossly harmful visual impact on the surrounding area when account is taken of the following:

- (a) the extent of the site area (some 242 acres – equivalent to 137 football pitches);

- (b) the scale and extent of the development itself, comprising some 3 million sq. ft built floorscape – and this aside from the vast tarmac areas;
- (c) the size, height and humongous ‘mass’ of the proposed sheds;
- (d) the elevated nature of the site; and
- (e) the illumination of the night sky from the associated tall lighting columns.

The combination of the above means that the harmful visual impact would not only be from short distance views but also medium and long distance. We can understand the attractiveness of this site for such development given its proximity to the motorway interchange. However, in landscape impact terms – when viewed from the north across the rising open countryside to the south – with the huge sheds sitting right on the ‘top’ above the skyline, the adverse visual impact would be enormous. Any argument that this scale and type of development could reasonably be mitigated by earthmounding and landscaping is absurd.

### **2. Insufficient justification for proposed rezoning**

Given the above landscape impact there surely has to be a truly exceptional case for this rezoning on grounds of major economic benefit/urgent community need and/or national interest.

However, this rezoning is simply to enable development of vast warehousing units for sale or rent. Other such facilities in the Borough exist and have been provided in far more suitable and sustainable locations - as an example in the Westbrook (‘Omega’) area in and around the former Burtonwood Airfield site which is located not only alongside the motorway but also contiguous with the built-up area. This unlike the application/ rezoning site which is detached from the built-up area and within Green Belt/open countryside.

The Council’s existing Local Plan refers to the importance and ‘permanence’ of the Green Belt (para. 6.20). The economic arguments in this instance are therefore surely outweighed by the weight to be given to maintaining the existing Green Belt and avoiding the grossly harmful landscape impact referred to in (1) above.

### **3. Argument re siting alongside existing employment area**

The rezoning also cannot be reasonably justified on the basis of its location alongside the Barleycastle Trading Estate - being referred to in the Plan as a ‘consolidation’ of that complex.

The Barleycastle warehousing complex was permitted on the basis of it being a ‘brownfield’ site – specifically the site of the former disused Stretton Airfield. The proposed rezoning area, apart from it being more than twice the size of the Barleycastle complex, is a ‘greenfield’ site.

The Council’s Draft Plan also states that the Proposed Employment Area *‘will provide a strong Green Belt boundary ..... and will ensure that development preserves and enhances the built and natural environment’*. This statement simply beggars belief.

### **4. Traffic and highways implications**

This major development would also involve significant increased traffic – both HGVs and employees’ vehicles – with associated adverse impacts on the local highway network. Referring back to the Langtree application, the likely employees’ car numbers are apparent from the proposal for 2,400 on-site car parking spaces (for a stated 4,100 employees).

The highways impact also needs to be viewed in association with other committed and planned major developments in the area; and furthermore in the context of the recent ‘history’ of the planning/infrastructure issue in south Warrington, which is summarised within the next section.

## **Proposed South East Warrington Urban Extension**

Our objection grounds are as follows.

### **1. Harmful impact on countryside character and loss of agricultural land**

This area of rolling Cheshire countryside is unquestionably of exceptional high landscape value. Its character and topography make it an area of 'true' Green Belt. It is also of high amenity value to the general public – with its walkways enjoyed not only by local residents but also Warrington residents and visitors. It is also good agricultural land.

Good planning must surely ensure protection of the 'best' open landscape areas – which indeed is the whole purpose of the existing Green Belt zoning/policy. Extensive areas of land have been and are being developed in this vicinity and, in this context, we strongly object to this further scale and extent of proposed development.

This is not to suggest a blanket 'embargo' on development. There obviously needs to be a reasonable 'balance' and acceptance of a certain degree of development to meet housing needs (this subject also to the infrastructure constraints – see (2) below). Such development in our opinion could be provided throughout this and other parts of South Warrington on a more limited incremental basis with constant review of its impact on highways infrastructure. This to go hand in hand with housing needs being met on brownfield sites and areas of lesser landscape value in other parts of the Borough and sub-region.

We make these comments not as 'nimbies' but as Warrington residents, thinking of the long term future of the town and the importance of safeguarding special open countryside for the enjoyment of this and future generations.

NOTE: We have not commented on the issue of housing need/numbers because we have not had time to read that part of the Draft Plan.

### **2. Traffic implications/highways infrastructure**

My wife and I have recently returned to Warrington, having worked and lived outside the UK for 30 years. Prior to our return friends had forewarned us of the town's severe traffic congestion and peak hour gridlock problem, particularly with regard to north-south/south-north traffic movements. We are also aware of the strong local opposition to the current proposals on traffic grounds.

Before commenting on this matter it is useful to first view the current rezoning proposals in the context of the recent 'history' of the planning/infrastructure issue in south Warrington – this summarised below. In outlining this summary I should mention that I, Roy Webster, was born and brought up in north Warrington and was employed in the Council's Planning Department in the period 1972 – 1987; for a number of years I was Senior Planner dealing with all applications/planning issues in South Warrington.

#### **New Town Designation /Outline Plan/development threshold**

Following Warrington's designation as a New Town in 1968, large areas of land in South Warrington were zoned for housing under the Development Corporation's New Town Outline Plan (approved in 1973 following an Inquiry in 1972).

Most importantly, the proposed zoning of these areas went hand in hand with the provision of a proposed 'North-South Expressway' involving a high level bridge (HLB) across the Ship Canal alongside the Cantilever Bridge – the expressway running south to the M56 and north to connect with two east-west expressways across the town. The purpose of the N-S expressway was to serve the new proposed development and avoid and relieve traffic congestion on the A49 (through Stockton Heath) and the A50 (through Grappenhall and Latchford) plus the Lumb Brook Road/Cantilever Bridge route.

The expressway/HLB was itself controversial because of its environmental impact and impact on residents around the HLB section. **It was nonetheless integral to the opening up of the South Warrington 'Bridgewater' area for development** - this to the extent that, at the '72 Inquiry into the Outline Plan, Cheshire County Council (CCC) had stated that no more than 1,000 houses should be permitted south of the Canal in advance of completion of the expressway/HLB.

#### WBC/CCC comments on early New Town development proposals

The Development Corporation's detailed submissions for each phase of development did not go through the normal planning permission process but were approved by the (then) Department of Environment under section 6 (1) of the (then) New Town Act 1965. The Borough Council and County Council made comments as consultees.

I recall that, in the period around 1976, following submission of the NTDC's proposals for 'Dudlows Green1' (around 250 houses east of Appleton Park), both WBC and CCC raised no objections to that proposal but stated that they would strongly object to any further major development in this area until the HLB/expressway was built. This I'm sure will be Minuted.

CCC thereafter slightly revised its position in its 1977 County Structure Plan (excluding reference to a threshold 'figure') and stating that, until the HLB/expressway was built, development should be restricted to a level consistent with the capacity of the existing highways and bridges (and for this reason, unlike WBC, did not raise objections to a subsequent further Dudlows Green submission for around 400 houses). My recollections are that CCC had at that time also referred to the strategic importance of housing land in Bridgewater (for 'executive' housing) both for Warrington and surrounding districts of the County; however in so doing they had still re-emphasised the need for resolution of the HLB/expressway issue.

Around the period 1980 I also seem to recall the submission of a Joint Surveyors Report (by both CCC and WBC Chief Highways Surveyors), again stressing the need for the HLB/expressway and also stressing the need for the HLB not to be viewed in isolation but as an essential part of the wider expressway network for the planned expansion of Warrington.

#### Revised NTDC strategy for Bridgewater

Also around 1980 the NTDC revised its strategy for the area via a new 'Bridgewater Context Plan' - still proposing further major development in Dudlows Green and Pewterspear and still with the associated proposed HLB/expressway – but with the zoned/designated areas lying east of the line of the expressway (within the New Town boundary) shown as a 'grey' area 'no longer programmed for development by WNTDC'. This because of the limited timescale of the 'life' of the NTDC – with the future planning of these areas to be dealt with by WBC. (NOTE: the large 'grey' area specified at that time is now largely included within the designated Green Belt - which the Council now wishes to include in the current rezoning proposals).

### Subsequent developments

The original 1,000 houses threshold was actually reached in 1980. Since that time further major development has taken place and is continuing as follows:-

- hundreds of further new houses – likely well over another 1,000? – have been built in the Dudlows Green, Pewterspear and Grappenhall Heys areas – this both through New Town 6 (1) submissions and Council planning permissions (all this without the expressway/HLB);
- there are further outstanding planning permissions (currently being built) for a further 930 houses – this figure referred to in the previous Draft Local Plan.

Hence, over the last 40 years, major development has taken place in south Warrington without the associated/original planned highways infrastructure.

### Current Draft Local Plan – housing and infrastructure proposals

The current Plan proposals need to be seen in the above context and are as follows:-

#### *Housing numbers*

- The Updated Plan now proposes an additional 4,200 houses in the area (2,400 during Plan period and 1,800 beyond).
- The Updated Plan also proposes the aforementioned SE employment area (with the pending application indicating provision of 2,400 on-site car parking spaces)

#### *Proposed highway improvements*

These principally involve:-

- Improvements at the junction to the M56 and M6.
- New link roads connecting the development sites to the A49 and A50.
- An improvement scheme to relieve the A49/B5356 junction at Stretton.
- A ‘possible’ further crossing of the Ship Canal, with no reference to timescale.
- A ‘safeguarding’ land area alongside the Cantilever Bridge – so as not to prejudice future development of a new Ship Canal crossing – this for possible use as part of a ‘future’ mass transit public transport system for the town; this again with no reference to timescale.

### **Comments and views on traffic/highways issues in context of above**

#### General points

- The Council continue to approve and propose further major development in South Warrington without the requisite highways infrastructure – specifically the HLB/expressway which was integral to the original ‘planned’ expansion of this part of South Warrington.
- The combination of the large housing numbers committed by existing consents, together with the numbers proposed with this rezoning, plus the proposed employment area, will obviously involve a massive increase in traffic throughout south Warrington, in particular the A49 through Stockton Heath, the A50 through Latchford village, the A56 and Lumb Book Road. This will inevitably involve increased traffic congestion in these areas and have an adverse impact on the whole character and amenity of the district and the amenities of existing residents.

- The whole purpose of the HLB/expressway proposal was to serve the new major development and **relieve** the A49 and A50. The current proposals involve major development and link roads **onto** the A49 and A50.
- The major increased traffic on the A49 and A50 (and also Lyons Lane which serves as part of a 'link' road) also needs to be viewed in conjunction with the nature of these roads in this area - with large lengths having existing residential frontage development with direct access points and contiguous pedestrian routes. As such, further increased traffic/congestion will significantly impact on local residents in terms of general amenity, noise and pollution. Account needs to be taken not only of the physical capacity but also the environmental capacity of these roads.

#### Impact on Stockton Heath

The Stockton Heath centre and its residential surrounds, based around the A49/A56 junction, is already now a busy and congested area for large parts of the day, especially during peak hours and also when the swing bridges are off. Its shops, bars and restaurants also make it an attraction for people from a wide catchment area. This results in significant on-street parking in the area, to include both on the A49 and A56, and also with the surrounding residential area virtually full of on-street parking, this adding to traffic circulation problems in the vicinity and impacting on the amenities of local residents.

Within this context the increased traffic impact from 'just' the 930 houses currently approved and being built has yet to be seen, but will inevitably increase the existing congestion, circulation and residential amenity problems in that area. This aside from the further major rezoning now being proposed.

We have heard anecdotally that NW Ambulance drivers attending at Stockton Heath Medical Centre quite often say that, in terms of traffic congestion, it is one of the most difficult centres to access during peak hours.

Also, because of the frequent congestion on the A49 into Stockton Heath, existing Appleton and Stretton residents driving into the centre from the south will often take a detour off the A49 and access the centre via existing residential roads to the west (Quarry Lane/Windmill Lane/Red Lane/Whitefield Road). This will obviously increase with further major development - again to the detriment of local residents in that area.

#### Impact on Lumb Brook Road/A56 junction

Another significant pinch point is the Lumb Brook Road/A56 junction (frequently used by local traffic using the Lumb Brook Road/Cantilever Bridge route into town) – this junction being close to the single width 'under bridge' of the Bridgewater Canal.

Our neighbours advise that peak hour traffic on Lumb Brook Road at times backs up from this junction nearly as far as Witherwin Avenue, sometimes taking 20 minutes in the junction queue to reach the A56. Also that right turning traffic from the A56 into Lumb Brook Road is now occasionally unable to do so even with the lights on green, thus causing an obstruction on the main highway.

Again this situation will considerably worsen with 'just' the 930 houses committed under existing permissions – and this again aside from the additional proposed 4,200 houses.

If any future traffic management system is necessary to make this part of Lumb Brook Road one way only, this would not only involve considerable inconvenience to local residents but also result in the displaced traffic being transferred onto the A49 through Stockton Heath, hence adding to the existing impacts there.

We could address in further detail the traffic impacts on Latchford Village and, for example, Lyons Lane, but hopefully the above two case explanations demonstrate the validity of our concerns on this matter.

#### Issue of recent and proposed highways improvements outside the area

We consider it unlikely that recent and proposed highway improvements in other parts of town will reasonably mitigate traffic impacts (as a result of the rezoning) on the local road network in Stockton Heath, Grappenhall, Latchford Village and Lumb Brook Road.

Whilst the new road crossing at Arpley Meadows has resulted in a significant traffic flow improvement at Bridge Foot, it seems to have had no noticeable impact/improvement within and around the Stockton Heath area.

Although the proposed (2026) Western link road will result in major improvements for the town by removal of W-S/S-W traffic through the town, it will not affect the major increased traffic from the rezoning areas onto the surrounding local road network, i.e. A49/Stockton Heath, A50/Latchford Village and Lumb Brook Road – and this with its associated residential amenity impacts.

The most appropriate and logical highways solution to adequately serve the existing and proposed major developments in this area, whilst at the same time relieving the A49 and A50, is the HLB/expressway proposal as originally planned and approved under the '73 Outline Plan. It is however reiterated that the HLB/expressway proposal was, and still would be, an extremely controversial proposal in terms of its huge impact on residents in the area, especially in the vicinity of the bridge (Latchford, Stockton Heath and Grappenhall).

#### Issue of orderly planning

Broadly speaking, WBC is now largely proposing 'reactivation' of the old '73 'New Town' rezoning areas (albeit on an even larger scale) without the associated '73 planned highway infrastructure.

It is ironic that 40 years ago WBC was itself opposing the former NTDC's much lesser scale development proposals without that infrastructure; and now itself, having over many years granted major planning permissions for further developments (for at least 2,000 dwellings?), is now proposing even further major development (4,200 dwellings) without that infrastructure.

The housing issue has no doubt been an important consideration in the granting of these permissions; and perhaps the line taken by the Council has been and is that traffic congestion is part of modern life and has to be balanced against the provision of much needed housing. This is understandable but only to a degree. If for example the continued approval of developments without requisite infrastructure results in congestion (especially in residential areas) becoming so severe as to affect people's health (pollution, amenity), together with

pedestrian safety problems and/or unreasonably impeding emergency service vehicles, it then becomes a threat to public safety and becomes unreasonable.

To allow continued development without adequate infrastructure runs contrary to the fundamental principles of orderly planning; and is also against the public interest.

It is our view that the Council, especially with its more recent approvals for a further 930 houses, has been really 'pushing it' - and that the huge scale and extent of its current two rezoning proposals is a bridge too far.

### **Conclusion**

In conclusion we object to the aforementioned rezoning proposals taking into account:-

- (a) the significant adverse traffic impacts on the exiting local road network, with associated adverse impacts on the character and amenity of the area and the amenities of local residents;
- (b) the lack of adequate highways infrastructure to serve this scale of development – specifically the absence of the original planned HLB/expressway proposal;
- (c) the potential adverse impact anyway of the HLB/expressway proposal both on the environment and amenities of residents in the vicinity of the bridge;
- (d) the exceptional high landscape value of the area; and
- (e) the loss of good agricultural land.

On the basis of the above combination of factors we consider that orderly planning dictates that only a much more limited scale and extent of development be permitted in this area – and even this subject to further traffic impact assessment – with the existing Green Belt designation largely retained in order to ensure continued protection of this special part of Warrington's countryside.

Yours faithfully

Roy & Elizabeth Webster  
(signed hard copy to be hand delivered)