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**From:** Tony Marsden [REDACTED]  
**Sent:** 15 November 2021 14:12  
**To:** Local Plan  
**Subject:** Objection to Proposed Submission Version Local Plan 2021 (UPSVLP 2021)

## **Warrington Borough Council (WBC) Updated Proposed Submission Version Local Plan 2021 (PSVLP21)**

**Firstly I wish to record my opposition to the PSVLP21. My reasons for opposing this plan are as follows:-**

### **General comments about the Local Plan**

- The vast majority of the greenbelt release takes place in the South East Urban Extension. However, all of the public consultations run by WBC were at the Halliwell Jones stadium in central Warrington. None were held in south Warrington where the most impacted residents currently live. I therefore suggest that the Council did NOT meet the duty to cooperate and so this brings into question the soundness of the plan.
- The 2018 ONS data predicts lower growth for the town of 458 homes per annum. The plan states that 816 homes per annum are required and so does not take into account the most recent data. This therefore brings into question the soundness of the plan.  
WBC has not demonstrated any track record of achieving anything close to the building completion rate needed to meet their unrealistic targets. If they cannot meet existing lower needs then it begs the question as to how they intend to complete the much higher rate per the plan.  
There are many construction sites for residential development already underway in Warrington and it is not clear from the plan that such builds have been taken into account with the calculation of homes that are needed. For example, there are 3 large blocks of flats currently being built adjacent to the Manchester Ship Canal in Latchford. I therefore suggest that the new homes figure is higher than is actually needed.
- The priority of the Council should be the development of brownfield sites and not development on greenbelt. Most of the land in the South East Warrington Garden Suburb plan is greenbelt, much of which is already owned by Homes England. Developers will obviously prefer to build on prime greenbelt land as it is much cheaper than having to “clean up” brownfield sites prior to developing them. Developing brownfield sites first will also ensure that the town has a thriving population centrally who are best placed to use the amenities that WBC are spending millions of pounds on developing, such as the new Times Square.
- The recent statements by our Prime Minister (Boris Johnson) and Michael Gove (the new Levelling Up Secretary) have signalled a new “brownfield first” strategy when it comes to planning permissions for new home developments. This needs to be taken into account by WBC before the release of any further greenbelt land.

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

One of the documents supporting the PSVLP21 and included as a link on the Council’s website was prepared by Homes England and Miller Homes in August 2021. The plan seeks to build 2,400 houses over the period of the plan and 4,200 overall.

On page 5 of this document it states:

***“...create a new sustainable community with strong links into the existing urban area and town centre.”***

On page 7 of this document it states:

***“...With the good connections back into Warrington...”***

These comments could not be further from the truth as the area does not have a sustainable transport structure into Warrington Town Centre. The local plan does not contain details of any new road/bridge connections from the

area into Warrington town, other than in general form. There is no substance, costing, etc and is purely aspirations by the Council. So this statement by Homes England is unsound.

A large area of the proposed development is bordered by Appleton Thorn Village, Lumb Brook Road, Stockton Lane and Bridge Lane (Grappenhall). The most direct routes from this area into Warrington would be via two Victorian crossings (one over / one under) at the Bridgewater Canal. Both are single-track routes.

The proposed infrastructure for the whole Urban Extension does not deal with existing pressures or issues of congestion and cannot therefore accommodate the additional demands of the proposed development. There is a dependence of 18th and 19th Century infrastructure to accommodate the traffic generated by the proposed development in this area. Building an additional 4,200 houses (overall expected total) in the South East Urban Extension will result in approximately >8,000 additional cars. The routes taken from that area into Warrington will be via the following crossings over/under the Bridgewater Canal and the Manchester Ship Canal:-

***Bridgewater Canal crossings:***

- Church Lane Bridge, Grappenhall (Grade II listed) - single track road  
Access would be through the village of Grappenhall which has many Grade II listed buildings and a cobbled street which is not suitable for anything except light traffic.
- Stanny Lunt Bridge – single track road controlled by traffic lights  
There is a weight limit on this Victorian structure and the traffic lights already cause delays.
- Lumb Brook Bridge Aqueduct (Grade II listed) – single track road controlled by traffic lights  
The lights are 3-way between Stockton Lane, Lumb Brook Road and Chester Road. When travelling under the bridge to Chester Road there is further traffic lights. One set is at the Lumb Brook Road / Chester Road junction and another at the Chester Road / Ackers Lane junction. Traffic is already congested here especially during school times with cars using this bridge to get to the schools on the Cobbs Estate.
- London Road Bridge, Stockton Heath – A49 two-way traffic, no weight restriction  
Already a very busy road that sees high traffic volumes and congestion whenever there are problems on the M56 / M6 as traffic tries to find alternative routes through Warrington.
- Red Lane Bridge, Stockton Heath (Grade II listed) – single track road controlled by traffic lights  
There is a weight limit on this Victorian structure. Traffic passes over the bridge on a “first come first served” basis as there are not any traffic lights. There are already problems with overweight vehicles crossing this bridge in contravention of the weight limits.

***Manchester Ship Canal crossings:***

- Chester Road Swing Bridge, Walton
- London Road Swing Bridge, Stockton Heath
- Knutsford Road Swing Bridge, Latchford

These bridges were built in the 1890's. Current data from WBC shows that they open on average once per day. Each time the bridges open it closes the route to/from Warrington with of course the knock-on effect of traffic congestion.

The additional traffic caused by this development cannot be managed without serious consideration and planning of alternative crossings over both these waterways. To have just an aspiration for such crossings in the Local Plan does not satisfy the requirements of the soundness of the plan.

On page 5 of this document it states:

***“...It will provide better cycle and pedestrian linkages, access to schools, shops and community facilities, delivering on everyone’s physical, social and environmental infrastructure needs within the totality of the principal landownership.”***

Whilst it is in everybody’s interests that we try to reduce car usage, the geography of the area and distance to Warrington town centre, does not lend itself to many residents using bikes as a form of transport into town.

Furthermore, the plan fails to address the already overloaded road system in South Warrington. We already have bottlenecks in Stockton Heath, Latchford, and at junction 10 of the M56, Junction 20 of the M6, and London Road between Stockton Heath and junction 10 of the M56.

The plan contains a link road from Stretton Road to the A49 somewhere opposite the Spire Hospital which does not address current issues of congestion. There are no firm plans for improving the junction of Lyons Lane / A49 or for the Owens corner roundabout on the A49. Both these junctions will see significant additional traffic flows if the plan were to be approved..

The proposed new junction opposite the Spire Hospital on the A49, if operated by traffic lights, would create further congestion. We already have problems with vehicles backing up to the junction 10 of the M56 and at times, onto the motorway itself.

Consequently I do not believe that the plan can be considered as sound.

Per the Local Plan, the Urban Extension includes the B5356 (Stretton Road at the Cat and Lion Junction) being blocked which will result in serious disruption to local residents. Local traffic will be restricted in having easy access to the local school, Stretton Church, the Park Royal Hotel as well as to their local residencies. Traffic wishing to cross the A49 from Stretton Road into Hatton Lane will be prohibited and, worst of all it will result in increased reaction times for emergency services..

### **Air pollution**

Traffic levels across the villages of Stretton, Stockton Heath, Grappenhall and Latchford in particular are already high, causing high pollution levels due to their proximity to A roads and motorways (M6/M56). Warrington has historically been one of the worst towns for air quality in the North West of England and the likely increase in road traffic per this Local Plan, particularly in the Urban Extension, will only worsen the situation in these local villages. The World Health Organisation (WHO) ambient air quality database published on the 29th May 2018 names Warrington as one of the top 5 towns/cities in England that exceeds the pollutant limit. Building more properties in this location exposes more people to the air quality problems and noise pollution from the two nearby motorways.

### **Release of Green Belt**

The original objectives of designating areas of the countryside as “greenbelt” are:-

- a) To check the unrestricted sprawl of large built-up areas;
- b) To prevent neighbouring towns merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns;
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The South East Urban Extension will result in a suburb merging Stockton Heath, Grappenhall, Grappenhall Hayes, Appleton, Wrights Green, and Stretton. Apart from one field near Appleton Thorn, this will be a suburb from the M56 down to Bridgewater Canal. We will lose the identity of these distinctive villages south of Warrington. I therefore believe the plan not be sound as it contravenes all of the above objectives for Green Belt.

### **Quote from the Local Government Association – 2015:**

*“The use of Green Belt has prevented ‘ribbon’ or ‘strip’ development whereby a continuous but shallow band of development forms along the main roads between towns. The strongly held view that settlements should be maintained as distinct and separate places, has been served by Green Belt designation of the intervening land (or in some cases by the application of quasi Green Belt policies). Given that a lot of land designated as Green Belt is on the immediate fringe of significant urban areas, it is a positive reflection on Green Belt policy that it has helped to retain this land as open and hence as a valuable resource. The urban fringe is the nearest opportunity for outdoor recreation for large numbers of people in urban areas, if the land is publicly accessible. **Land in these locations will be increasingly valuable for food and energy production in future. Such land should not just be kept open, but should be positively managed, through such initiatives as multi-functional community forests.**”*

In my opinion, the Local Plan does not adhere to the Local Government Association’s guidance.

### **Green Belt Assessment – April 2021 (Ove Arup & Partners Ltd)**

This document is one of the support documents for the WBC Local Plan and is linked on their website. To quote from that document:

*“The aim of the Green Belt Assessment was to provide the Council with an objective, evidence-based and independent assessment of how each site contributed to the five purposes of Green Belt set out in national policy.*

*The Assessment did not consider whether ‘exceptional circumstances’ exist or make any recommendations relating to the alteration or review of Green Belt boundaries.”*

Generally, the review concluded that the green belt in the Urban Extension plans were typically “weak” or “moderate” performing with the exception of “strong performing” sites adjacent to Broad Lane, Grappenhall.

**However**, when we look at the **UK Defra Agricultural Land Classification (ALC)** for the land in the Urban Extension plans, the land is classed as Very good to Moderate. This equates to ALC grades 2 and 3. These are typical throughout Cheshire and comprise some of the better and more fertile areas of productive land for crop growing. The majority of the land in the proposed local plan area is in fact Class 2, very good with a small proportion as class 3. It also has a classification of 2 as being some of the Best and Most Versatile (BMV) agricultural land in the area. The Government ***Guide to assessing development proposals on agricultural land (Updated 5 February 2021)*** includes the following:-

- Developers and local planning authorities (LPAs) should refer to the following government policies and legislation when considering development proposals that affect agricultural land and soils. ***They aim to protect:***
  - *the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals*
  - *all soils by managing them in a sustainable way*
- A Green Future: Our 25 Year Plan to Improve the Environment sets out the government’s 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:
  - *Protect the best agricultural land*
  - *Put a value on soils as part of our natural capital*
- Local Planning Authorities should use NPPF to make decisions about the natural and local environment to:-
  - *Consider the economic and other benefits of BMV agricultural and try to use areas of poorer quality land instead of higher quality land*
  - *Recognise soils as a natural capital asset that provide important ecosystem services*

Based on the above, I believe that the Local Plan is unsound as it is not adhering to government criteria with regard to the release of green belt and valuable agricultural land from necessary food production.

### **South East Warrington Employment Area – “6/56” development**

The development proposals are to release 137 hectares of Green Belt to enable warehousing and logistic companies to build an enormous business park. The plan is not sound. The lack of sustainability of the plan is highlighted by the development of more warehousing facilities on this greenbelt land. It fails to understand the potential automation of warehousing facilities and so the predicted jobs growth is unlikely to happen.

There is no justification for the loss of Green Belt. It doesn’t meet ‘very special circumstances’. It will in particular be a threat to the openness of Green Belt.

I have serious concerns around the high volume of traffic adding to the already significant pressure on the motorway and local roads. Highways England raised concerns in 2019 and it isn’t at all clear whether the latest amendments will satisfy them. It certainly shouldn’t satisfy us - we know what that motorway is like day in, day out. The last thing we need is thousands more vehicles on it.

WBC Local Transport Plan (LTP4) makes much of the claim to be building on the opportunities of a huge drop in vehicles using the highway network and increases in walking and cycling, through initiatives which support and encourage sustainable transport, such as the distribution of an updated cycle map to residents across the borough. However, this is totally contradictory to the aspirations of the 6/56 development that will INCREASE the volume of heavy goods vehicles. Yes the site is not in town, but all the vehicles will be passing close to Warrington via A -roads and/or the M6/M56 motorways. So this will add pollution (noise and fumes) to the area, and Warrington already has the one of the worst records for air pollution in England..

There are already frequent incidents involving HGVs on the local motorways which results in congestion through south Warrington as cars and lorries try to find other routes through Warrington. Add to this the poor condition of

the local swing bridges which fail with the slightest rise in temperature, and this will result in failure of the local infrastructure to cope with the traffic.

The situation will be intolerable should a distribution centre be built leading to more traffic in the area.

Reading through the analysis of environmental impact and the mitigations, there is mention of "negligible" or "minor adverse" impact observations listed. Once the site has been bulldozed in readiness for development, the bats, birds, hedgehogs, brown hairs, amphibians, etc. will have gone. It's no good just to say that planting a few trees and hedges will result in "minor adverse impact". The damage has already been done. The Biodiversity analysis states that there will be a "net gain". It may well be that hedging is planted throughout the site and there are (per the master plan) some ponds sited between some of the warehouses. However, with the noise pollution, light pollution and toxic fumes pollution from the HGVs and employees' cars, these habitats will be a far cry from the green belt environment currently enjoyed by the wildlife. One only has to drive along Grappenhall Lane and Barleycastle Lane to also witness the terrible impact of litter that is thrown from transport using these roads. The litter along the verges and hedgerows is scandalous, and is caused by users of the existing commercial estate. It will only get worse with the 6/56 development

**For these reasons the Updated Proposed Submission Version of the Local Plan (UPSVP21) should not be allowed to release green belt land for residential development.**

**George Anthony Marsden**



**15<sup>th</sup> November 2021**