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Sent: 15 November 2021 14:45
To: Local Plan
Subject: OBJECTION to Updated Proposed Submission Version Local Plan 2021 (PSVLP21)

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 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 brings into question the “soundness” of the plan.
- 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. 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

- The local plan does not contain details of any new road/bridge connections from the area into Warrington town, other than in general form. These are purely aspirations by the Council and do not meet the absolutely necessary requirement for new crossings over the Bridgewater Canal and Manchester Ship canal.
- The most logical routes from this area into Warrington is via two Victorian crossings (one over / one under) at the Bridgewater Canal. Both are single-track routes. There is a further Victorian single-track bridge in Grappenhall over the same canal, but to get to this one must drive through the village over cobblestones. It is not suitable for anything other than light traffic volumes.
- Building an additional 4,200 houses (overall expected total) in this Urban Extension will result in thousands more cars. The routes taken from that area into Warrington will be via:-

Bridgewater Canal crossings:

- Stanny Lunt Bridge – single track road controlled by traffic lights. There is a weight limit.
- 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. Traffic is already congested here especially during school times with cars using this bridge to get to the local schools.
- London Road Bridge, Stockton Heath – A49 two-way traffic, no weight restriction
The A49 is a very busy road that suffers from 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. There is a weight limit.

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. Each time the bridges open to let ships through, it closes there is a knock-on effect of traffic congestion. Throughout the summer, all of these bridges have at some time been closed due to heat causing the bridges to get “stuck”, resulting in chaos on the local roads.

- 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.
- The Local Plan (Urban Extension) mentions that the B5356 (Stretton Road at the Cat and Lion Junction) will be blocked. This 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 residences. Traffic wishing to cross the A49 from Stretton Road into Hatton Lane will be prohibited.

Air pollution

Warrington has historically been one of the worst towns for air quality in the North West of England. In fact, the WHO air quality database published in May 2018 names Warrington as one of the top 5 towns/cities in England for exceeding the pollutant limit.

The likely increase in road traffic per this Local Plan, particularly in the Urban Extension, will only worsen the situation in these local villages.

Release of Green Belt

The South East Urban Extension will result in a suburb merging Stockton Heath, Grappenhall, Grappenhall Hayes, Appleton, Wrights Green, and Stretton and we will lose the identity of these distinctive villages south of Warrington.

Quote from the Local Government Association – 2015

*“.....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.

The **UK Defra Agricultural Land Classification (ALC)** for the land in the Urban Extension is classed as Very good to Moderate (ALC grades 2 and 3). The majority of the land in the proposed local plan area is in fact Class 2 (very good). 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 extracts:-

- “...Developers and local planning authorities (LPAs) should**aim to protect:**
 - *the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals”*
- “... the government’s 25-year plan to improve the health of the environment.....plans to:
 - *Protect the best agricultural land*
 - *Put a value on soils as part of our natural capital”*
- “Local Planning Authorities should.....
 - *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”*

I believe that the Local Plan is unsound as it does not follow 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 Council fails to understand the potential automation of warehousing facilities and so their predicted jobs growth is unlikely to happen.
- I have serious concerns around the high volume of traffic adding to the already significant pressure on the motorway and local roads.

- WBC Local Transport Plan (LTP4) claims to be building on the opportunities of a huge drop in vehicles using the highway network and increases in walking and cycling. This is contradictory to the aspirations of the 6/56 development that will increase the volume of heavy goods vehicles which will add pollution (noise and fumes) to the area.
- There are frequent incidents involving HGVs on the local motorways, resulting in congestion through south Warrington. The situation will become intolerable should a distribution centre be built leading to more traffic in the area.
- Once the proposed site has been bulldozed in readiness for development, the wildlife will have gone. Planting a few trees and hedges may result in restoring only a very small percentage of wildlife habitats. But, coupled 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.
- The traffic to/from the existing business park on Barleycastle lane already results in terrible amounts of litter being deposited by people. It will only get worse with the 6/56 development

For these reasons the Updated Proposed Submission Version of the Local Plan (UPSVLP21) should not be allowed to release green belt land for residential development.

Margaret Marsden



15th November 2021