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**WARRINGTON**  
Borough Council



# **Warrington Borough Council**

## **Local Plan**

### ***Preferred Development Option***

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

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## 2: Questions

### Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

### Response:

I reserve my position on this issue until the Government's forthcoming revised methodology for calculating the number of homes required has been published.

## **Question 2**

**Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?**

### **Response:**

**No comments at this stage, but I reserve my right to comment at Final Plan stage.**

### **Question 3**

**Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?**

#### **Response:**

**No comments at this stage, but I reserve my right to comment at Final Plan stage.**

#### **Question 4**

**Do you agree with the new Local Plan Objectives?**

**Response:**

**See attached document**

### **Question 5**

**Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?**

**Response:**

**There are major deficiencies in the Green Belt Assessment**

## **Question 6**

**Do you have any comments to make about how we've assessed different options for the main development locations?**

### **Response:**

**The Sustainability Appraisal (SA) does not explore the impact on the character of Warrington if it loses the gap between Warrington and Runcorn.**

**Option 1 performs positively against the majority of the plan's objectives. The SA states, "the positive effects are most pronounced for options 1 and 2, which are considered more likely to contribute to the New City concept and to secure strategic infrastructure improvements to support the developments and the wider area" In light of the Council's SA, I urge the Council to develop option 1.**

**I have serious concerns that the negative impacts of option 2 have been under-played. In particular, the south-western urban extension has strongly negative impacts for the reasons given in my accompanying detailed response.**

**The specific impacts of the Port Warrington proposals have not been adequately assessed and the sustainability appraisal of the South West urban extension is inadequate in relation to heritage impact, landscape impact and traffic impact.**

## **Question 7**

**Do you agree with our Preferred Development Option for meeting Warrington's future development needs?**

### **Response:**

**No - I do not agree with the Preferred Development Option. I strongly object to Option 2 because it would dramatically reduce the gap between Warrington and Runcorn urban areas, creating almost continuous built-up area between the two towns.**

**Option 1 is preferable to ensure that Warrington and Runcorn do not merge into one another.**

### **Question 8**

**Do you have any comments to make about our Preferred Development Option for the City Centre?**

**Response:**

**No comments at this stage**

### **Question 9**

**Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?**

**Response:**

**No comments at this stage**

## **Question 10**

**Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?**

**Response:**

**Yes - See attached document**

### **Question 11**

**Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?**

#### **Response:**

**The proposed Garden City Suburb is welcomed as a sustainable means of growth that does not harm the purposes of the Green Belt.**

**I support Option 1, for the Garden City Suburb to be the main focus for Green Belt land release.**

## **Question 12**

**Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?**

**Response:**

**Yes - See attached document**

### **Question 13**

**Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?**

**Response:**

**No comments at this stage.**

## **Question 14**

**Do you agree with our approach to providing new employment land?**

**Response:**

**No comments at this stage.**

## **Question 15**

**Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?**

**Response:**

**No comments at this stage.**

### **Question 16**

**Do you agree with our suggested approach for dealing with Minerals and Waste?**

**Response:**

**No comments at this stage.**

### **Question 17**

**Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?**

**Response:**

**See attached document**

## **Warrington Borough Council Local Plan**

### **Preferred Development Option Consultation**

#### **Response /Objection**

##### **Overview of Warrington at present**

My comments are made against a backcloth of Warrington's continued failure to deliver the level of infrastructure and services required to meet the needs of the town's population, especially to the south of the borough.

The inadequate network of roads in and around the town are almost always overloaded and regularly brought to a grinding halt by any incident or accident on the three major motorways adjacent to the town. This can and does regularly result in what should be a 5 minute journey from Walton to Bridgefoot taking up to and in excess of an hour.

This situation is regularly further exacerbated by the significant increase in ship movements on the Manchester Ship Canal as well as regular mechanical failures which in reality should be expected of three poorly maintained antique bridges crossing the waterway at Chester Road, London Road and Knutsford Road.

This will become increasingly more difficult as Port Warrington's operations come fully up to speed.

WBC's relationship with Peel does not appear to carry any element of control as can be seen by the recent debacle in getting Peel just to agree to paint the three aforementioned bridges, let alone bring them up to a modern functional standard.

North Warrington is currently well served by no less than 5 railway stations yet South Warrington, despite previously having stations at Latchford and Moore (2) currently has none?

## **Proposals**

My objections focus on two specific aspects of the PDO; the Warrington South West Urban Extension (R18 – 005 and R18-125) and Port Warrington (R18 – 133)

### **Warrington South West Urban Extension (R18 – 005 and R18-125)**

Peel Holdings (R18/125) suggest they would include a buffer of 250m between Warrington's urban edge and Moore village. The plan shown in the Warrington South West Urban Extension documentation indicates that the 'green gap' between the Moore and Halton boundary and the siting of houses proposed in A1, A2 (R18-005) and A6 represents significantly less than 50m which is an effective destruction of the green belt and a merging of Warrington and Runcorn.

### **Number of houses in relation to existing dwellings**

The housing proposals for the Warrington South West Urban Extension essentially represent a new village of 1,890 houses, between the Halton-Warrington boundary on Runcorn Road and the A56 at Walton. To put this into perspective, a suggested population of approximately 4,000 people, compared to the current population of the three adjacent villages of Moore, Higher Walton and Daresbury of just more than 1,500.

Residents of these proposed houses will inevitably use the local road network, heading either towards Warrington and the junction(s) with Chester Road or through Moore, which is simply not suitable for the quantity of traffic envisaged.

In 2012, a road traffic survey undertaken by Halton Borough Council showed that 19,000 vehicles used Runcorn Road over a 7 day period. The section of Runcorn road from the Warrington Borough Boundary to Moore Lane has already seen a substantial increase in the volume of HGV traffic accessing Port Warrington for the development and operation of the first phase of the port. This is expected to increase significantly as work on developing the second phase of the Port commences. (Although the consequential destruction of Moore Nature Reserve will offset some of this traffic increase).

The 'S' bend in the village adjacent to Moss Lane is also a regular bottleneck as is the area adjacent to Moore School which has raised recent concerns about child safety.

A further road traffic survey is required to accurately identify the current and potential increase in the use of roads in Walton and Moore for existing and likely new residents, those using the route as a thoroughfare or a 'rat run' and the development and operational stages of Port Warrington.

Any problems on Chester Road (A56), whether caused by accidents, roadworks, pop festivals or even major road resurfacing programmes result in significant increases in traffic through Walton and Moore Village. This will increase dramatically if the south-west urban extension proceeds.

There have been problems in the past with high-sided vehicles hitting the railway bridge on Keckwick Lane. Both Moore Bridge and Acton Grange Bridge on the canal have had significant damage in recent years, caused when large vehicles follow non-commercial satellite navigation systems to escape traffic problems on the A56. Such problems are likely to increase proportionately if the south-west extension proceeds.

The impact on local highways has not been adequately addressed and is poorly reflected in the Council's sustainability appraisal. This requires more detailed consideration.

## **Infrastructure to support new ( and existing) residents**

### **Roads/Traffic**

The last traffic survey conducted on Runcorn Road in 2012 was part of numerous complaints lodged in relation to Warrington's mismanagement of the first phase of Port Warrington and the impact this work was having on the volume of traffic passing through Walton and Moore. The Warrington South West Urban Extension will see an addition of a further 1,900 houses with approximately 3,600 vehicles added to the daily commute.

### **Schools**

Although there is a new primary school proposed as part of the Warrington South West Urban Extension, there is no indication as to whether this would be built prior to building 1,900 more houses, or if children living in these new houses would add even more pressure to the limited primary and secondary education provision in South Warrington.

### **Doctors/Dentists/Hospital**

The Warrington South West Urban Extension documentation refers to a 'medical facility', but again there is no indication as to whether this would be operational prior to building 1,900 more houses, or if the families living in these new houses would need to access services via the current GP and Dentist provision in the area. Many of the existing GP and NHS dental services are currently not taking on new patients (my partner and I are still registered in Birchwood and Lymm!).

## **Shops**

With limited shopping facilities in Stockton Heath, most residents of the Warrington South West Urban Extension would add to the already debilitating congestion in the village, exacerbated by the increasing number of bridge movements on the MSC. Car parking is limited and Stockton Heath is regularly gridlocked. Local 'convenience stores' are limited in provision and expensive and Warrington and Halton Lea provide the only comprehensive shopping facilities.

## **Port Warrington (R18 – 133)**

R18-133 covers Peel's Port Warrington proposals for a large distribution centre with around 200,000 square metres of warehousing and facilities on land adjoining the Ship Canal, to create a 24/7 operational port.

In December 2016, a SHLAA Call for Sites Registration Form (R18-133) was lodged with Warrington by Turley on behalf of Peel Holdings. The form provides information about the proposed site for the entire Port Warrington complex – both Phase 1 and Phase 2, together with an outline site plan covering the 74.19ha (183.32 acres) of land to be used in this development.

However, in the Mersey Ports Masterplan (Consultation Draft, June 2011) the proposed Port Warrington site referred to 11 acres for Phase 1 and a further 24 acres for Phase 2.

By the time Warrington had published their Core Strategy in 2015, these figures had been revised in the following statement:

***The existing 11 hectare site operates entirely as a road-based distribution centre with no utilisation of the Ship Canal for movement of goods. Planning Permission was granted in 2011 for the extension of the existing operations onto an adjoining 4.5 hectare area of land facilitated by the infilling of the site, the refurbishment and extension of the canalside berth and the reinstatement of a rail freight connection. It is anticipated that the permitted multi modal port facility could be operational by 2017.***

In the five years between 2011 and 2016, the land proposed for the Port Warrington site has increased by 148.32 acres from 35 acres to 183.32 acres. Why?

### **Impact on Traffic/Local Roads**

The rural roads to the south of the Ship Canal (Runcorn Road, Moore Lane) are little more than country lanes and entirely unsuitable for higher volumes of commercial traffic, hence regular repairs and resurfacing activities. This opinion was endorsed in a warning issued by the Cheshire County Council engineer as far back at 1989 in relation to the volume of traffic accessing Port Warrington site then.

At present, Port Warrington can ONLY be accessed via Moore Lane, a country lane passing over both the West Coast main line and the local rail line. Moore Lane has no footpath or lighting for local residents or visitors to Moore Nature Reserve. The road has been reduced to single file traffic controlled by traffic lights over the last few years due to safety issues raised by the volume of HGV traffic accessing the Port and the approach to the traffic control lights was recently subject to major piling and reinforcement work due to the embankment failing under the weight of HGV vehicles. Furthermore, Moore Lane Swing Bridge is a listed structure built in the late 1800s and cannot take too much heavy traffic.

During infill work completed by Peel as part of the first phase, several complaints were lodged with Warrington BC regarding the permissions granted, the lack of conditions attached to the permissions and Warrington's inability to control any breaches of conditions in an effective and timely manner. The impact this infill work had on certain parts of Moore raised several serious issues of public safety and it is essential that any development relating to Phase 2 of Port Warrington along the northern bank of the Manchester Ship Canal should from here on be accessed only by roads from the North, within Warrington borough. The Local Plan must make explicit that any further development at Port Warrington would rely entirely on these new roads and the rail link required as a condition of the permissions to operate the first phase of the Port.

### **Moore Nature Reserve**

Moore Nature Reserve is a unique Woodland/Wetland combination site, which by its very nature hosts an unusual mixture of flora and fauna. It was created very deliberately and carefully to provide a rich and diverse range of habitats. In doing so, as was pointed out by the consultant ecologist at the time, a far greater number of species of flora and fauna would be supported.

It was thought that the creation of the reserve may have been little more than a quid pro-quo for the extraction of valuable sand and sandstone by the Manchester Ship Canal Company (now Peel), but the ecological aims have been not only met, but exceeded.

Moore Nature Reserve is often referred to as a 'green lung' of Warrington, but when the site plan of the reserve is overlaid with the outline map of Port Warrington contained within form R18-133, the plans for the port effectively destroy the reserve.

Whilst I could make a strong case for protecting the nature reserve, there will be far better, able and qualified people equipped to do this. However one of the best cases I have heard for the importance of the reserve was actually penned by the consultants employed by the Manchester Ship Canal Company in their Statement of Proposals to modify the Nature Reserve, submitted to Cheshire County Council in 1989.

The conversion of the Arpley Landfill site into a 400acre “Country Park” may well satisfy the basic requirements of access to green space in the longer term. However, a country park does not a nature reserve make. Despite a doubling in acreage, the new venture (if completed) would still not be able to support the species diversity, which the Nature Reserve does.

The contents (flora and fauna) of the reserve cannot simply be translocated, since the ecology there is unique, incredibly complex and has taken decades to develop. Once the bulldozers move in, the reserve and everything in it will be gone for good.

### **The impact on Residents**

The proposals will have detrimental impact on the 80 homes at Promenade Park, Moss

Lane, Moore. These lie directly opposite the proposed 24/7/365 container port and warehousing facility with the only buffer being open water on the Manchester Ship Canal. The Port Warrington proposals will have an unacceptable impact on those living on Promenade Park due to the levels noise and the immediate visual impacts.