

WRITTEN SUBMISSION TO WARRINGTON LOCAN PLAN EXAMINATION

Respondent ref. no 0685 – Roy & Liz Webster

The attached submission is by Roy Webster – on behalf of my wife and I as south Warrington residents. I am also a qualified planning officer (eligible for membership of the RTPI) with 36 years post qualification experience. I was employed by Warrington BC between 1972 – '87, to include a period as a Senior Planner dealing with all applications and planning issues in South Warrington (in period late '70's/mid '80's). Thereafter I worked outside the UK planning system for 25 years. Now retired. I am unable to participate at the EIP due to holidays. Written submission on MIQ's is attached.

Matter 6(b) – Main Development Area – South East Warrington

MIQ3 – Contribution of land in question to the purposes of the Green Belt

The land in question is of high landscape value, and in parts truly exceptional.

A point I wish to add is that the land on the north side of Warrington (north of the Ship Canal) comprises flat low lying land which is of little or no topographical interest; whereas the land to the south side is of high landscape value and high topographical interest. The lack of topographical interest in the north further reinforces the need to protect the high topographical interest in the south.

I was born and lived in north Warrington for 35 years. Like so many people I would regularly travel with friends to south Warrington to enjoy its special countryside character and amenities - to include walks in Appleton around the Dingle and surrounds (plus Grappenhall and Walton), and fishing on the Bridgewater Canal, etc. etc. The point being that this area is a valuable asset enjoyed not only by south Warrington residents but all Warrington residents and visitors; and as such should surely be safeguarded for this and future generations.

The whole purpose of the existing Green Belt designation is to protect the area.

MIQ4 – Effect of developing the site on the purposes of the Green Belt

The **scale and extent** of this rezoning proposal, in addition to the major housing development which has been and still is taking place in the area, would ‘suburbanise’ and severely harm the existing landscape character.

Apart from the ‘built’ suburbanisation, the associated increased traffic in the area, together with the increased traffic through the area from the employment rezoning, would itself significantly harm the character of the area.

MIQ5 – Are there exceptional circumstances to alter the Green Belt in this area

On the basis of the above, plus the points in our representation letter, we submit that there are insufficient exceptional circumstances to alter the Green Belt for this scale and extent of development. As stated in our letter, this is not to suggest a blanket embargo on development – the issue is one of reasonable degree – albeit a significant limiting factor is also of course the highways infrastructure constraint.

MIQs 8 & 9 (joint) – Does Policy MD2 identify all appropriate and necessary infrastructure requirements? and Are there potential adverse effects not covered.

In terms of the basic principles of orderly land use and transportation planning, I consider the Local Plan to be flawed. This taking into account (i) the recent planning history of development in south Warrington; (ii) the current highways situation/impacts; and (iii) the current Local Plan proposals. These covered below.

(i) Recent Planning history

The recent history is outlined in our representation letter but I wish to briefly reiterate and include additional points as follows.

- Following New Town designation in 1968, the Development Corporation (DC) - under its 1973 Outline Plan – set out a clear land use and transportation strategy for an expanded Warrington.
- The '73 Plan included major rezoning/development in south Warrington (so-called Bridgewater Area) which went hand in hand with proposed major highways infrastructure – specifically a N/S expressway with a high level bridge (HLB) crossing the Ship Canal; this expressway running south to the A49/M56 roundabout, and including an offshoot road (Howshoots link) to A50 by M56/M6 interchange.
- The purpose of the expressway/HLB was to serve the new development and relieve traffic congestion on the A49 (through Stockton Heath), the A50 (through Latchford Village and Grappenhall) and A56 – this also relieving the swing bridge problems.
- At the '72 Inquiry into the Outline Plan, CCC Highways had actually suggested a development threshold of no more than 1,000 new houses in Bridgewater in advance of completion of the expressway/HLB.
- In the late '70's/early 80's, following Government approval (under the New Towns Act) of early DC proposals in Bridgewater, WBC itself (as a consultee) objected to DC submissions for further major development - for example the 'Dudlows Green Action Area' (around 400 dwellings) – this on the basis of impacts on the existing local road network without the proposed infrastructure.
- The original 1,000 houses threshold was reached in 1980 (42 years ago).
- Since that time further major development has taken place in the area – both through New Town consents (up to its winding up in '89) and Council planning permissions. I do not know the figure but assume at least an additional 2,500 houses?
- The Council continues to grant planning permissions for further major development (e.g. Kings Quarter, Orchard Meadows, Astor Grange etc.) currently being built. This despite its own past objections to the former DC proposals without the infrastructure.

(ii) Current highways situation/traffic impacts

The local traffic impacts/congestion problems arising from the above are addressed in our representation letter and, more importantly, in the comprehensive traffic report by the Rethinking South Warrington's Future Group.

Suffice to say that South Warrington residents and indeed most Warrington residents do not require traffic counts nor highways assessment reports to know that there are existing severe peak hour congestion problems on the A49 (through Stockton Heath), the A50 (through Latchford) and at the Lumb Brook Road/A56 junction. This is exacerbated when the swing bridges are off. In the event of a local motorway accident/diversion, it becomes gridlock.

A point to re-emphasise is that large lengths of these roads have existing residential frontage development with direct access points and contiguous pedestrian routes. As such increased congestion significantly impacts on local residents in terms of general amenity, noise and pollution. Account needs to be taken not only of the physical capacity of these roads but also the environmental capacity. A further issue is access onto these roads both from the frontage properties and also side roads at peak hours.

The increased congestion/impacts from the large developments currently under construction remains to be seen.

NOTES: 1. Traffic levels obviously reduced with the pandemic (since March '20) and are still seemingly not yet back to pre-pandemic levels.

2. If the Ship Canal owners (Peel Holdings) decide to proceed with their Port of Salford plans, with increased containerage along the canal and increased swing bridge movements, this will result in major traffic congestion as a result of development already undertaken in south Warrington.

(iii) **Local Plan proposals**

Within the above context the Local Plan now proposes an additional 4,200 houses in the area (2,400 during Plan period).

The rezoning is largely within the original New Town Designated Area boundary, comprising land originally acquired by the former DC and now owned by Homes for England.

Put simply, the Council is now effectively (and largely) proposing reactivation of the old '73 New Town zoning areas but without the associated '73 planned highway infrastructure.

The whole purpose of the planned expressway/HLB was to serve the new major development in south Warrington and **relieve** the A49 and A50. The Local Plan proposals instead involve new major development and link roads **onto** the A49 and A50. This will further increase the existing traffic impacts/problems.

In addition, the Local Plan involves rezoning of land beyond the original New Town boundary – specifically in the area south of the B5356 in Stretton.

Furthermore, the Local Plan proposes the new SE Employment Area beyond that boundary. The recent Langtree application on 'part' of this site includes provision for 2,400 on-site car parking spaces; it is likely that a significant number of employees will reside in north Warrington, with further increased traffic through the area.

What then – in terms of highway improvements - has changed since the original New Town Plan?

It seems that the only relevant change is the recent new road crossing of the River Mersey at Arpley Meadows (the 'Centre Park' link – opened March '21 during pandemic). This has resulted in traffic flow improvements at Bridge Foot, and although there must have been some degree of improved flow on the A49 in Stockton Heath (difficult to assess degree due to coming-out period of pandemic) the existing congestion problems in and around Stockton Heath most certainly still remain; this view confirmed by friends/residents in Stockton Heath.

Moreover, the Centre Park link will not affect the impacts of significant increased traffic from the rezoning areas onto existing local roads (e.g. Lyons Lane) and 'onto' A49/Stockton Heath, A50/Latchford Village and Lumb Brook Road/A56.

Concluding comments

The continued approval of further development without the requisite infrastructure has already resulted in unacceptable traffic congestion and adverse impacts on the amenities of existing residents.

The rezoning proposals will significantly exacerbate these problems with further increased impacts on residential amenities and indeed public health (pollution and pedestrian safety); also further impeding bus services and emergency vehicles.

Any argument that traffic congestion is simply part of modern life and has to be balanced against much needed housing and employment is understandable but only to a degree.

I reiterate our view that the Council, with its recent major planning consents, has been really 'pushing it' – and that the scale and extent of the current rezoning proposals is a bridge too far.

In my opinion the Plan runs contrary to the principles of good/orderly land use and transportation planning and, as such is unsound.

NOTE: I have recently discovered a report which I submitted to the Council's (then) Development Services Committee (July '80) regarding DC plans for the Pewterspear area, to include a Science Park proposal, subsequently dropped. It is attached (Enclosure 1) simply to demonstrate the planning/infrastructure issues being addressed 40 years ago, to include comments of the Borough Highways Surveyor.

MIQ 12 – Are any main modifications necessary for soundness?

In my opinion, modifications are necessary and should ideally include:-

- A massive reduction in the extent of rezoning
- Proposing/permitting smaller scale development throughout this and the wider surrounding south Warrington area, with periodic review of the traffic situation; this as opposed to large 'blanket' rezoning as currently proposed
- Protection of truly exceptional areas of landscape value – as an example the swathe of open/undulating landscape down to the wooded Lumb Brook Valley in the area either side of Dingle Lane. Such areas should surely remain sacrosanct and not be developed as currently proposed.
- Site selection not to be dictated by land ownership as seems to be the case here (with virtually all the rezoning land owned by Homes for England). Whilst recognising that this helps delivery, a wider planning view is surely required.
- The above to also 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. This to ensure continued Green Belt protection of the best areas of natural landscape value.

I would finally refer to the recent quote by the Government's (now former) Levelling Up Minister Michael Gove – on BBC news 11 May 2022. With regard to the Government's pledge to meet its specified housing targets he stated that:

*'It is no kind of success to hit a target if the homes that are built are shoddy, **in the wrong place, don't have the infrastructure required and are not contributing to beautiful communities**'.* (emphasis added).

Matter 6 (f) – Main Development Area : South East Warrington Employment Area

MIQ 2 - Issue of background to the site allocation and how it was identified.

1. Locational attraction

One cannot help assume that, when the Planning Department and Council initially considered rezoning this land for employment/logistics use, it was principally viewed 'two dimensionally' - in other words in the context of a two dimensional plan/map of Warrington - with the site's suitability based on the proximity to the M6/M56 interchange; this complementing major logistics and warehousing development in the NW (Omega) and NE (Grange & Birchwood) areas of the town.

However, the proposal also needs to be considered three dimensionally, in the context of a three dimensional topographical model of Warrington, which would demonstrate that, in terms of environmental/visual impact, this is just about the worst possible site for gigantic logistics sheds; this site being on one of the highest points in Warrington – on the top of rising land (actually on the ridgeline) and some 250 feet above sea level. For reasons explained in our previous letter and under Q5 below, the development on the skyline of such enormous sheds would have a severe harmful impact on the existing Green Belt and countryside character.

The existing logistics and warehousing complexes in the NW & NE of the town are entirely suitable locations – being not only alongside motorways but also on flat low lying land contiguous with the built-up area; unlike this site which is on high land in open countryside and detached from the built-up area.

2. Reference to existing Barleycastle Trading Estate (former Stretton Airfield)

The rezoning is partly justified by the existence of the Barleycastle Trading estate which has already changed the character of the Green Belt in this area; this point also raised in the recent Langtree application.

I submit that the existence of an existing visual intrusion in the Green Belt (in this case on a brownfield site) does not justify rezoning/permitting a considerably larger visual intrusion which would not only dwarf the Barleycastle complex but also destroy the existing Green Belt character of the area.

Because the Barleycastle complex will likely be referred to at the EIP, it is important to briefly explain some key points regarding that site.

3. Barleycastle complex – background points

WBC 'inherited' the former Stretton Airfield site/development on Local Government reorganisation in 1974.

Warehousing and haulage depots had been and were already taking place here on an ad hoc basis and there were (a) growing pressures both for and against development; (b) outstanding consents for further major development; and (c) issues of inadequate infrastructure – this even for the existing and committed development - specifically inadequate highways (with poor access to the M56 via Cartridge Lane) plus inadequate foul drainage and water supply.

The Council undertook a review via a Local Plan, which outlined alternative planning options, to include (1) no further development; (2) limited development with infrastructure improvements – including a new access road; and (3) major development.

In the event, the Council opted for option (2). Factors against (3) included strong objections by the (then) Ministry of Agriculture to loss of good agricultural land; and also the countryside location. The Plan included a tight surrounding Green Belt boundary (part of the (then) proposed N. Cheshire Green Belt).

I am aware of the above because I prepared the Local Plan and, on behalf of the Council, took it through Public Inquiry (Sept '81) prior to its formal adoption.

Circumstances do of course change over time but, interestingly, in my evidence to the Inquiry I concluded by referring to the proposed tight Green Belt boundary and stated that....'*the future development is not seen as setting a precedent for further surrounding development.*' (copy of extract from proof of evidence (Enclosure 2)).

MIQ5 – What would be the effect of developing the site on the purposes of the Green Belt

The Langtree application demonstrates that the combination of (a) the vast scale and extent of development; (b) the size, height and humongous mass of the proposed sheds; (c) the elevated nature of the site; (d) the vast areas of hardstanding; and (e) the illumination of the night sky, would mean that the proposal would have a grossly harmful visual impact on this Green Belt area. And the Langtree application only relates to **part** of the rezoning area.

We would add the following points to our previous letter.

Viewpoints

When viewed from the north/north east across the rising open countryside to the south - with the sheds sitting right on the 'top' above the skyline, the adverse impact would be enormous. The impact would not only be from short distance views but also medium distance (from A50) and also long distance. Indeed the impact of the huge development mass on the skyline would be apparent when viewed from some 20 miles away across the Mersey Valley – specifically in the area east of Wigan (for example Aspull and Horwich areas below Winter Hill).

Comments

I genuinely believe that the Council's Development Management Committee, in recently approving the Langtree application, have not been able to properly understand and visualise the impact of this development on the surrounds, and have primarily concerned themselves with the economic/employment benefits.

I was told that, at the Committee meeting there were, for example, no large scale visual impact images on display.

It is also my genuine belief that, if this development is approved and built, the public will be shocked by the enormity of its impact and it will be viewed as the biggest ever planning mistake in Warrington.

MIQ6 Are there exceptional circumstances to alter the Green Belt in this location

Given the importance and ‘permanence’ of the Green Belt, as referred to in the existing Local Plan (para 6.20), there has to be an exceptionally strong case for the rezoning.

We do recognise (a) the growing need and demand for logistics sites, (b) the attractiveness of this site next to the motorway interchange and (c) the economic/employment arguments (with most of the Committee meeting on Langtree devoted to arguments about likely employment figures).

However it is our view that the degree of harmful impact in the countryside is so great that, even in its own right, this outweighs the economic/jobs argument – even with the highest jobs figures discussed. This also having regard to the following:-

- taking a long term view, this huge blot on the landscape, being totally out of context in the open countryside/skyline setting, will be there for at least 50 years;
- there is no exceptional case for rezoning on national interest grounds;
- despite Langtrees’ submissions regarding the pressing regional need for logistics sites this cannot possibly, in the wider regional context, be the only suitable/available site;
- Warrington has and is making significant provision for logistics mega-sheds in the NW of the town (Omega site) – in an entirely suitable and sustainable location;
- due to the nature of the logistics business, it is likely that in the not too distant future there will be increasing automation and robots in these buildings with less numbers of people employed. Hence the number of people employed in the medium and long term will likely be disproportionate to the environmental ‘costs’/impact of such large buildings in this location.

The above also needs to be seen in conjunction with the following additional factors.

Highways impacts

The rezoning will likely involve significant increased traffic (employees) through south Warrington, further increasing adverse impacts on the local road network – this in addition to the Plan’s major housing rezoning as covered in our comments on MIQ 6 (b).

Loss of agricultural land

In our representation letter we referred to the loss of 98 ha (242 acres) of agricultural land, contrary to existing Local Plan policy CC2.

Since that letter, this matter is now of increased national importance due to world events.

Impact on local residents

The size and proximity of the development relative to the properties in Cartridge Lane to the north and around Bradley Farm area to the east (in particular relative to the property Bradley View) would result in substantial loss of amenity to these residents.

MIQ 17 – Are any main modifications necessary for soundness?

On the basis of the above we consider and hope that this rezoning proposal will be removed altogether and that the land be retained within the existing Green Belt.

Roy Webster

Enclosure 1 – Copy of planning report to WBC Development Services Committee - 1 July 1980

Enclosure 2 – Copy of extract of R T Webster proof of evidence at Public Inquiry into Stretton Airfield Local Plan - 8 September 1981