

3rd June 2019

devcontrol@warrington.gov.uk

MS Alison Gough
Planning Case Officer
Warrington Borough Council
New Town House,
Buttermarket Street,
Warrington,
WA1 2N

Dear Alison

RE: 2018/32514, LAND BETWEEN A49 WINWICK ROAD TO A573 PARKSIDE ROAD, INCLUDING A PROPORTION OF THE FORMER PARKSIDE COLLIERY WITH LAND, FROM A573 PARKSIDE ROAD TO A579 WINWICK LANE CONNECTING TO M6 JUNCTION 22, WA2 8ST.

1. I am writing on behalf of both CPRE Cheshire and CPRE Lancashire to strongly object to the abovementioned development.
2. CPRE has been standing up for the countryside for the last 90 years. CPRE has been central to the establishment of National Parks, Areas of Outstanding Natural Beauty and Green Belt. These planning tools help to protect and enhance our rural places. We want future generations to benefit from thriving rural places, productive farmland and to have beautiful rural views.
3. We believe the proposal is unjustified, and will prevent the strategic rail freight opportunity from being realised in the future. In summary it is not in accordance with the Development Plan and it will lead to more harm than benefit in the short and long term.
4. The relevant local Development Plan document for Warrington Borough Council (WBC) is the Local Plan Core Strategy (adopted July 2014), which has a plan period up to 2027, and sets out the overall approach to development in the Borough. The following local planning policies in the Local Plan Core Strategy are considered relevant for the Proposed Scheme:
 - Policy CS 1 Overall Spatial Strategy - Delivering Sustainable Development states the need to make the best use of existing transport, utility, social and environmental infrastructure within existing settlements and ensure

additional provision where needed to support development. The link road will cause more road based freight and this is not sustainable.

- Policy CS 2 Overall Spatial Strategy - Quantity and Distribution of Development states that Warrington will continue to function as the primary settlement in the Borough. The Local Plan Core Strategy plans for the delivery of 60% new residential development within the Inner Warrington Area, and therefore Green Belt land should not be opened up for development at the risk of preventing brownfield sites from coming forward.
- Policy CS 5 Overall Spatial Strategy - Green Belt states that the Council will maintain the general extent of the Green Belt until 2032. The road will harm Green Belt purpose; and
- Policy MP 5 Freight Transport states that "...freight related development will be supported but this must be to have a net reduction in road traffic kilometres and CPRE rebuts the proposition that the proposal supports rail freight. There would be adverse impact in terms of heavy good vehicles using residential roads, congesting central areas or creating unacceptable noise, vibration, lighting, emissions, or other pollution.

5. We understand the Council is currently working on a Local Plan Review.
6. CPRE Lancashire has considered the Planning Statement Addendum, and updates to the Environmental Statement, Transport Assessment, and other update documents, but remains of the opinion that the harms outweighs the benefits. The key issues are:
 - Harm to Green Belt purposes, including cumulative impact of large B8 shed developments in ribbons along the M6 motorway, for this reason if minded to approve the decision would need to be referred to the Secretary of State for a decision on whether it is necessary to call-in for his own determination;
 - Landscape impacts. The land to the east of the M6 Motorway is particularly rural and isolated as there is no public transport. The intrusion of a road carriage way will harm the rural setting. There are barely any unspoilt views left in the vicinity.
 - An unsustainable increase in road based freight, leading to further air quality issues - air pollution is already evidence to be in exceedance of safe limits;
 - Environmental harms, including noise and light pollution - the loss of tranquillity from the area and the loss of wildlife habitat and flora and fauna contained within. We echo concerns raised by Derek Richardson of GM Ecology Unit (GMEU);
 - Loss of land currently used for agriculture and jobs directly and indirectly associated with it. Indirect jobs including those within the food and drink

sector. For food security reasons we need to retain farmland for future food and farm produce.

7. To be clear CPRE does not object to the regeneration of that part of the site (approximately 30%), which was recorded Details of: National Land Use Database: Former Parkside Colliery, Winwick Road, Newton-le-Willows for employment use (NLUD reference 431500005). But we think an alternative scheme can be devised to deliver a reduced scale scheme for needed jobs and housing without necessitating this new link road. Local people are keen for a country park to be promoted.
8. The Government sets out its policy for Green Belt in National Planning Policy Section 13. Protecting Green Belt land. In Paragraph 133. The NPPF states, 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. NPPF Paragraph 134. Green Belt serves five purposes:
 - 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; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
9. NPPF Paragraph 136. Goes on to say 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.'
10. CPRE Lancashire doesn't believe 'Exceptional Circumstances' exist or that in the case of this application that Very Special Circumstances exist.
11. CPRE Lancashire did respond to the various Local Plan consultations where we repeatedly challenged the economic assumptions that are used to evidence the City Region wide Strategic Housing and Employment Land Assessment (SHELMA) produced by GLHearn, and that of the BE Group. There are flaws in the calculation of objectively assessed need for employment. In reality, less jobs are needed.
12. There is a considerable brownfield land resource in Warrington and neighbouring St Helens. Releasing further farmland in Green Belt will not support brownfield reuse, in fact allowing more greenfields form development

will diminish the prospect of brownfield sites opportunity being realised for future development.

13. CPRE considers that current transport infrastructure for roads must be improved rather than expanded. We supports smart choices for travel, such as travel plans, car clubs and remote meeting, and that road freight should be discouraged and better alternatives for the moving of goods to be found. Unabated road building has to stop.
14. There is evidence from the Department for Transport, that increasing road capacity increases road use, therefore it does not providing long-term benefit. In fact it leads to an increase in Greenhouse Gas (GHS) emissions and is therefore unsustainable. The CPRE report [The End of the Road?](#) (click hyperlink) challenges the road building consensus.
15. CPRE believes that long term considerations should be applied to transport infrastructure planning to provide for a sustainable future. Transport has a critical impact on employment levels in rural areas. ‘Transport poverty’ has a significant social impact. Employment is changing, and micro businesses can be supported by digital infrastructure. Sustainable tourism can help boost transport provision and CPRE supports low carbon options for travel.
16. CPRE supports investment and improvement in bus, coach and light rail services and increased investment in these and active travel services and routes.
17. Local people are opposed to the link road proposal being promoted in Warrington and St Helens Green Belt by St Helens Council. CPRE champions rural places and we believe that the local people who strive for sustainable development ought to be listened to.

With my thanks for your consideration of this matter.

Yours sincerely,

Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager

Patron
Her Majesty the Queen
President
Emma Bridgewater
Chairman
Nick Thompson

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