

Warrington Updated Proposed Submission Version (PSV) Local Plan (September 2021)

Submission In Response to Consultation, With Special Focus on Transport Issues Relating to South and South-East Warrington

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Executive Summary

Warrington is a primarily-urban Borough with a tight boundary and exceptional economic growth and associated demands for development. The direct conflict between these two factors, and the priority need for additional land for housing and employment, is fully recognised in the comments below. Possible improvements/alternatives are therefore constructively suggested in a spirit of encouraging the positive future economic development of the town, as part of this response.

My principal objections to the Plan as published are as set out below.

The Plan does not meet the National Planning Policy Framework (NPPF) criteria of being “**Positively prepared**” because it fails to sufficiently and realistically address the highly-likely adverse transport effects that will flow from its implementation. A largely blind eye has been turned to those effects.

Secondly, the Plan is not “**Justified**” in NPPF terms, because it still primarily takes the easy, passive option of relying on the major use of mostly-inherited (Homes England, ex New Town

Development Corporation) Green Belt land for housing expansion, rather than thoroughly and thoughtfully assessing the wider opportunities for a better solution to accommodating desirable economic growth and meeting very real housing needs. It also uses Green Belt land for primarily-logistics distribution activities that is disconnected from both rail and waterway access.

Thirdly, the Plan is not “**Effective**” in NPPF terms because, despite hints at creating (quote) “transformational” change in the transport network, it has minimal certainty of funding the delivery of such a change. Not only does it rely on an as yet unplanned Mass Transit system that it will be most unlikely to be able to finance, but it also seeks to rely upon major human-behaviour change that it will have very little actual influence over in practice. It also very actively promotes HGV use over rail and waterways, in direct contradiction of Government policies.

Finally, for the fourth key NPPF criteria, the Plan is not “**Consistent with national policy**”, again specifically in terms of its wholly-inappropriate ambition for a massive motorway-served logistics and employment hub that, as stated above, has no hope of rail or maritime, accessibility. The huge-scale proposals for development at the intersection of the M6/M56 directly contradict current Government policy in relation to logistics-terminal location. It also contradicts the Department for Transport’s 2021 paper, Decarbonising Transport - A Better, Greener Britain”.

In wider terms, despite recent modification, the Plan near-completely disregards the widespread adverse public reaction against its earlier incarnation in 2019. It has been formulated on the basis of inherited parcels of land (inherited by Homes England from its predecessors) dating back to the New Town Development Corporation of the 1960s. In a sentence, it is a backwards-looking 1960s plan for the 2030s and beyond.

The Plan fails to grasp that it will, if implemented, result in intractable transport problems, indefinitely. Congestion and other adverse outcomes will intensify. The Plan almost completely fails to address the fact that the south side of Warrington is intersected by no fewer than three west-east waterways, with their limited crossing points. New crossings of the Bridgewater Canal and River Mersey will be costly, and a new crossing of the Manchester Ship Canal hugely expensive and intrusive and will create its own problems at its northern and southern ends. A new non-weight-limited crossing near the present 3-tonne-limited Cantilever Bridge will suck-in new HGV traffic onto unsuitable residential roads.

The Plan offers no significant solutions to these problems, other than a couple of short lengths of new road on the southern perimeter and some junction expansions, and hides behind the flawed AECOM study that is being misused to give the green light to the housing and employment proposals. Indeed, in the context of the sprawling South and South East Warrington housing and employment proposals, the Local Plan barely mentions future congestion problems at all.

And almost all proposed Local Plan transport spending that has any realistic chance of implementation seems set to further-strengthen the dominance of the private car.

The AECOM study, based upon surveys that were questionable at the time, itself may now be history. The recent severe COVID crisis (still very much running) has dramatically affected modal share in transport, across the entire UK and beyond. The long-term consequences, which include not only transport patterns but also retailing behaviour, are still very unclear. The flows-reporting precision of the AECOM work is thus false and deeply misleading. A complete revision and re-appraisal is required, but it may unfortunately still be too early yet for this to be undertaken, due to continuing COVID effects and consequential acute travel pattern instability.

The Local Plan places unjustified reliance on future significant new-resident use of sustainable modes such as buses, cycling and walking that in hard reality is most unlikely to take place on the scale sought. In particular, many typical UK “housing-estate” bus services are very unlikely to be profitable, especially during evenings and Sundays. There are very unlikely to be sufficient financial resources to support loss-making bus services indefinitely, after any initial developer or Council support ends.

Cycling and walking are very laudable, but a far-from-realistic option for many residents, especially for older people, parents with very small children, people with shopping, people with disabilities, and in poor weather and darkness. Many walkers, especially women, feel vulnerable in darkness. Crossing roads safely is becoming harder and harder. Footways are sometimes in poor condition, and sometimes also overgrown from adjacent properties. But nowhere are such realities acknowledged. A further deterrent to cycling is that much of current and proposed South and South-East Warrington housing is up a hill.

Astonishingly, the Local Plan completely overlooks the potential of the west-east local rail network. The further potential to grow the use of local stations such as Warrington West, Padgate, Birchwood and Glazebrook, and establish a new station at Barrow’s Green, on the north-western Borough boundary where the Liverpool-Manchester rail route intersects with the A5080, and expand the Fiddlers Ferry housing proposals right up to it, are ignored.

The huge proposal for a totally road-served logistics and other-employment complex at the junction of the M6 and M56 is straight out of the Dark Ages of transport planning. It completely contradicts a range of recent Government policy papers on logistics-terminal location, on freight, on emissions, and on the need to switch to sustainable modes. It would, if sanctioned, generate large additional amounts of both local-access and motorway traffic.

My central message. The process that should have taken place is first, a careful assessment of the transport network (road, bus, rail and cycling/walking), including problems and opportunities, and then a careful formulation as to how the housing can be fitted around the improved public transport network, with investment in the latter firmly funded in advance. This would play to the strengths of Warrington’s existing transport infrastructure, both road and rail, rather than implausibly relying on major behavioural change and vague hopes of new bus services which, however desirable, will not have financial self-sufficiency and thus long-term prospects.

This Plan represents the exact opposite process to the above, with houses and employment sites chosen first, plus a couple of new roads and a few upgraded junctions, then struggling to

finance, provide and financially sustain the necessary transport infrastructure. In lay terms, it has put the cart before the horse.

A far more sustainable approach would be to recognise that Warrington already has good-quality dual carriageways to the west (A562, A57), north (A49) and east (A57), and a local rail line to the west and east that serves the accurately-named Warrington Central. These are the existing transport corridors that could, and should, shoulder the weight of increased travel demand, not the unsuitable single-carriageway roads to the south (A49) and south-east (A50) that pass through the congested centres of Stockton Heath, Latchford and Grappenhall, crossing the unimprovable swing bridges over the MSC, and which will struggle to serve the non-rail-served south and south-east suburbs.

It is certainly not a case of starting again with a blank sheet. But the Plan, as it stands, requires a fundamental and rapid review that much more closely involves the people of Warrington in its re-casting, rather than steamrolling-through a deeply unpopular strategy that fails to live up to the name and which stores up trouble for the future.

The Local Plan could be a huge opportunity to provide additional housing and employment land whilst at the same time creating a markedly-better Warrington, particularly through strengthening the roles of the Town Centre and of public transport. At its best, a more enlightened way forward could mark Warrington out as a beacon of inspired and enlightened town planning practice, and a model for other medium-sized UK towns to follow. At its worst, it represents “the mixture as before”.

I therefore strongly recommend an urgent re-think, both for the housing proposals and the particularly ill-conceived South East Warrington Employment Area proposal, starting with assessing the existing available transport network and proceeding from that, and this time properly involving local people.

Warrington could yet represent a future, welcome, revolution in UK urban planning thinking.

David Thrower
8th November 2021



Warrington Updated Proposed Submission Version Local Plan (September 2021)

The Key Changes, 2019-2021

1. The 2019 Plan was very heavily criticised by many residents in South and South-East Warrington. The Key Changes in the Draft Local Plan 2021 are listed as follows (with my comments attached):
2. A reduction in new housing from 945pa over 20yrs to 816pa over 18yrs. (However, this reduced figure may arguably be still too high).
3. 580ha being removed from the Green Belt is only 5% of the total. (However, the area being removed is still very heavily concentrated in South and South East Warrington).
4. Removal of the proposed SW Urban Extension, 1,600 homes, and Massey Brook Lane, 60 homes. (This is welcomed).
5. (Allegedly) moving away from the South Warrington Garden Suburb of 4,200 homes in the Plan period and replacing it with the "South East Warrington Urban Extension" of 2,400 homes in the Plan period. But the impact post-2038, when up to a further 1,800 homes could follow, will take the total back to 4,200 again. The change in terminology, from "garden suburb" to "urban extension" will make little or no practical difference in transport terms.
6. The removal of the Port Warrington proposal. But this was to have been a "green" intermodal freight facility, served by rail and water as well as road. The Council's now-preferred site is the South East Warrington Employment Area, at the junctions of the M6 and M56, completely unservable by either rail or water and inevitably a massive trip-generator of HGV movements, some of which will be on local roads.
7. The inclusion of the Fiddler's Ferry brownfield site for housing and employment. But the housing proposals for Fiddlers Ferry are still too modest, and the lands to the north, up to a potential new station on the Liverpool-Warrington-Manchester rail line at Barrow's Green, at the Borough boundary with Halton, offer a greatly-enhanced opportunity - albeit still with a loss of Green Belt land - that has not been explored.

National Planning Policy Framework Tests of Soundness

8. The four key tests of soundness of Local Plans are set out in para 35 of the National Planning Policy Framework.
9. The four, with my comments on whether the Plan as formulated by Warrington Borough Council meets those tests are as follows:

10. **“Positively prepared”** - the Plan must provide a strategy which seeks to meet the area’s objectively-assessed needs.....and (which) is consistent with achieving sustainable development.
11. Comment: the Plan clearly seeks to meet the area’s needs. However, it is not consistent with achieving sustainable development in terms of its transport effects. The scale of new housing planned for South East Warrington is so great, and the likelihood of mass car ownership and use, so obvious, that the traffic consequences for the very constrained transport network in South and South East Warrington would inevitably be seriously damaging in terms of congestion and increased difficulty of movement. The latter would apply particularly to vulnerable road users such as schoolchildren and people with disabilities trying to cross roads, general pedestrians and cyclists, and also elderly drivers who would find the elevated traffic levels intimidating. The significant increase in road traffic would also pose a serious threat to delivering a more reliable bus service.
12. **“Justified”** - the Plan must offer an appropriate strategy, taking into account reasonable alternatives.
13. Comment: the Plan does neither. The Plan presents, at first sight, a strategy for distributing new housing starts within what is a very constrained Borough boundary. There are plans for new housing in South East Warrington, in outlying settlements such as Lymm and Culcheth, on brownfield sites such as Fiddlers Ferry, and in a redeveloped Town Centre and Waterfront.
14. However, the Plan has not considered establishing a significantly-greater concentration of housing to the west and north-west, in the area between the redeveloped Fiddlers Ferry site and the Liverpool-Warrington-Manchester railway where it intersects with the A5080 Farnworth Road, where a new rail station could readily be built (accessed from north of the bridge) to serve the new housing. The new station, which could also be made accessible to Halton residents in nearby housing, would give easy and fast rail access to Liverpool, Warrington Central, Birchwood and Manchester. The new station would be exactly halfway between the present Widnes and Warrington West stations, so would fit well in rail operational terms.
15. There would be good highway access from this proposed new housing to Warrington via the existing A5080/A562/A57, and westwards to Widnes via the A5080 and A562. The area could readily be served by through inter-urban Widnes-Warrington bus routes. It is acknowledged that there is a mineral reserve (sub-alluvial river terrace deposits) on a minority part of the proposed site, but this does not seem critical.
16. Also, to the east, the Plan does not explore the possibility of establishing significant new residential housing in the area between the railway at Birchwood station and the A57 road. Housing would have to avoid the area immediately south of the railway, as this is a peat reserve, but could be located beyond that. There would be the need for a new single-carriageway link road between Birchwood centre and (crossing the railway and then via the new housing) the A57, but this would give direct access to the

Shopping Centre, the station's train services to Warrington, Liverpool and Manchester, the A57 into Warrington, and the M6 motorway at J21. The area could readily be served by bus by extending the current A57 Martinscroft bus service east of the M6 and then northwards up to the Birchwood Centre (and beyond to Birchwood Science Park), along the new link road/bridge.

17. Also, the Plan does not adequately exploit the potential of expanding Winwick. Winwick is very well-linked to Warrington town centre (and Central Station) via the A49, which is dual carriageway (southwards) throughout. Although not served by rail, an enlarged community at Winwick would be served by Warrington-St Helens and Warrington-Newton-le-Willows bus services, giving access to Warrington Central and Newton-le-Willows stations with their fast trains to Liverpool and Manchester, as well as St Helens town centre.
18. Essentially, the Plan puts very heavy emphasis on developing the South-East and South of Warrington. This completely mismatches with the quality of the highway network elsewhere, where (as pointed out) there are extensive sections of dual carriageway to the west (A57), north (A49) and east (A57). The radial routes to the south (A49 and A50) are not only not dual carriageway, but include Manchester Ship Canal crossings that are intermittently-unavailable and of course physically incapable of upgrading/widening.
19. The Plan is thus fundamentally flawed in transport terms. The South-East and South of Warrington are also not served by local rail stations, nor can they be (any re-opening of the railway through Latchford and Thelwall as part of HS3/Northern Powerhouse Rail would be highly-unlikely to include scope for local suburban stations).
20. **“Effective”** - the Plan must be deliverable over the Plan period and based on effective joint working on cross-boundary strategic matters that should be dealt with rather than deferred.
21. Comment: the Plan would probably be deliverable in South East and South Warrington, as it largely depends upon building on Green Belt land that is in many cases already owned by Homes England. However, taking this “easy” route will bequeath South Warrington with indefinite and intractable transport problems.
22. As noted earlier, the approach should be to (1) first, realistically-assess the present transport network, (2) secure practical and near-certain-fundable improvements, and then (3) distribute the housing based not on inherited Homes England land-banks but upon where the transport network has capacity to cope with increased demand.
23. The approach that has been taken by Warrington Borough Council is pragmatic, but far too weak in aspiration, seemingly-unaware in terms of long-term consequences, and very short indeed on transport solutions. Some elements, such as the Town Centre, Waterfront and Fiddlers Ferry brownfield proposals, are highly praiseworthy and should be supported, but a significant re-think is going to be necessary for much of the remainder.

24. A more enlightened “2030s” (rather than “1960s”) approach would also harmonise with the more advanced policies of adjacent administrations such as Liverpool City Region (including Halton and St Helens) and Greater Manchester, whose boundaries are shared with Warrington’s.
25. **“Consistent with national policy”** - the Plan must enable the delivery of sustainable development in accordance with the National Planning Policy Framework.
26. Comment: the Plan is most-emphatically not consistent with current National Planning Policy Framework (NPPF) thinking.
27. The NPPF requires that developments are “sustainable”. “Sustainable” is defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” The transport effects of the Plan as published will most certainly compromise the ability of future generations to meet their travel needs efficiently, effectively and in an environmentally-sustainable manner. The Plan will bequeath future generations with intractable transport difficulties.
28. And in particular, as noted, the Plan has completely ignored the potential of the local rail network to give easy access to Warrington town centre, Liverpool and Manchester (including both airports).
29. Most strikingly, the Local Plan is not consistent with national policies on containing HGV movements to a minimum for congestion and safety reasons, switching as much freight as possible to rail or water, and addressing the carbon footprint of HGV movements.
30. The NPPF sets out three key policy objectives:
- (Summarised) An economic objective - building a strong, responsive and competitive economy, including the coordination of provision of infrastructure (my underlining).
 - (Summarised) A social objective - supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes are built to meet present/future needs, with accessible services and open spaces (again, my underlining).
 - (Verbatim quote) “An environmental objective - to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy (again, my underlining).

National Planning Policy Framework and Transport Issues

31. The NPPF specifically mentions transport (para 20). It states that “strategic policies should.....make sufficient provision for.....infrastructure for transport.”
32. It also states that (para 22) “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery.
33. In contrast, the Warrington Local Plan and particularly the LTP4 Transport Plan that preceded it, do not look ahead 30 years. It is notable that the AECOM traffic forecasts look to the years 2031 and 2038, just barely ten and seventeen years ahead respectively at time of writing. This means that the AECOM work and LTP4 have failed to assess the likely congestion in 2051 and beyond, the consequences of the Local Plan in transport adverse-effect terms, and the need for a coordinated integrated long-term transport plan, at least in firm outline.
34. The NPPF statement (para 60) of “(to meet the) Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed” is fully supported.
35. On transport, the NPPF (para 104) states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that (my underlining):
- The potential impacts of development on transport networks can be addressed.
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated.
 - Opportunities to promote walking, cycling and public transport use are identified and pursued.
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding, and mitigating any adverse effects, and for net environmental gains, and.....
 - Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
36. The NPPF goes on to state (para 106) that “Planning policies should.....identify and protect.....sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.”
37. Each of these issues is now commented upon as part of this Submission of Evidence.

Potential Transport Impacts

38. The potential medium and long term impacts of congestion in South and South-East Warrington have not been given material prominence in the published Plan. There is virtually no mention of them in relation to, for example, Stockton Heath high street, or Latchford gyratory, or the A50 through Grappenhall.
39. Nor is there any mention of the effects of increased congestion upon bus services, nor the increased noise of traffic for those living on the A50, Thelwall New Road, Latchford, Kingsway, Hunts Lane/Ackers Road, Grappenhall Road, the A49 London Road and Wilderspool Causeway.
40. Nor is any mention of the increased difficulties novice or older drivers would face in heavier traffic, nor of difficulties emerging from the many side-roads at unsignalled junctions (especially right turns), nor the increased hazards of crossing roads for parents with push-chairs, schoolchildren, older people and people with disabilities. There seems to be a complete unawareness of the certainty of these problems being further hyper-aggravated by the Plan's proposals

Opportunities From Existing or Proposed Transport Infrastructure

41. There is a fundamental under-estimate of the opportunities offered by existing infrastructure, and how these could be made greater with selective investment. For example, the A57 westwards from the Town Centre, the A49 northwards and the A57 eastwards, all incorporate significant (or in the case of the A49, continuous) sections of dual carriageway.
42. Yet the Plan and its housing and employment proposals place heavy emphasis upon the south (A49) and south-eastern (A50) approaches. There is absolutely no possibility of converting the A49 through Stockton Heath to dual carriageway, and even if the A50 from J20 of the M6 to the junction of the A56 was dualled, it could not be upgraded further west without significant loss of amenity, and not at Knutsford Road swing bridge at all. The Plan's emphasis on developments in South and South-East Warrington flies in the face of these facts.
43. The National Planning Policy Framework update of 2021, para 112, states:
- “Applications for development should give priority.....as far as possible to facilitating access to high quality public transport.....(and) maximise the catchment area for bus and other public transport services, and appropriate facilities that encourage public transport use.”
44. Para 125 of the NPPF 2021 states that:
- “Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities.....Plans should contain policies to optimise the use of land in their area.....and should include the use of minimum density standards

for.....locations that are well served by public transport.....” (my underlining). This suggests that opportunities to locate medium-density housing around rail stations (including new stations on lines with established stopping services) should be very much more actively sought in a more radically-revised Plan.

45. The NPPF sets out key guidelines for protecting the Green Belt. The purposes of the Green Belt include (para 138):

- To check the unrestricted sprawl of large built-up areas
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

46. The NPPF para 140 clearly states:

- “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”.
- “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development” (my underlining).

47. It is not possible as a member of the public to assess accurately as to exactly how thoroughly “all other reasonable options” were examined by Warrington Borough Council before arriving at the Plan as published. Assuming that they were reasonably thoroughly examined, it is concluded that what has happened is that alternatives have been rejected too early, on arbitrary grounds that are not as strong as they might be, and that potentially-helpful options have been progressively discounted, possibly for only moderately-important reasons, until what is now the only surviving, Council’s preferred, option was left standing. This is not a balanced rationale.

48. Crucially, the NPPF states (para 142) that “Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well served by public transport” (again, my underlining).

49. South and South East Warrington are not well served by public transport, despite the best efforts of a nationally-excellent local bus operator. The bus services are of low frequency (and would be expected to remain so, even in the Plan), and are frequently rendered unreliable due to congestion, road-works and swing bridge openings. And there are no rail stations, or even routes, in the area. To massively develop South and South East Warrington for housing and employment would therefore seem to be in direct breach of the NPPF guidelines, particularly as rail-served or potentially-rail-served opportunities elsewhere in the Borough have not been exploited at all in the Plan.

50. The NPPF also states (para 149) that “A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this (include).....limited affordable housing for local community needs under policies set out in the development plan.....”. The massive proposed housing and employment developments in South and South East Warrington clearly do not fit this exemption.
51. As detailed in the Appendices, the Local Plan, whilst suggesting increased walking and offering the possibility of improved cycle priorities and bus services, has no means of persuading the thousands of new residents that would populate the new housing estates proposed for South and South East Warrington in the Plan to actually walk, cycle or travel by bus.
52. Almost all of the proposed housing is beyond convenient walking distance from the nearest main centres at Stockton Heath and Latchford, and some are beyond convenient cycling distance for many residents. In both cases, most of the estates are uphill from both centres. Walking and cycling is understandably less popular in winter, in bad weather or after dark. Bus use, despite excellent vehicles, is unpopular with a very large sector of the population. And car ownership on the new estates would be expected to be high or very high. And as repeatedly emphasised in this Response, there is no rail (or rail-based light rapid transit) access.
53. Increased congestion is wholly predictable. The Transport Assessment of the NPPF requires “A comprehensive and systematic process that sets out transport issues.....(and) identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car (my underlining) such as walking, cycling and public transport, and measures that will be needed (to) deal with the anticipated transport impacts of the development.” This clearly has not been undertaken in the case of South and South East Warrington with anything like sufficient rigour. The AECOM work is readily open to challenge.
54. The Local Plan, as published, therefore signally fails to observe the key NPPF guidelines by failing, apart from to an extent in the Town Centre, to locate housing close to or within walking or cycling distance of any local rail stations. The considerable potential of the local rail network, in passenger terms, is completely ignored. The Local Plan 2021 is therefore directly in breach of the National Planning Policy Framework.

Alternative Suggestions for Additional Housing

55. It is suggested by this Response that the housing total for Fiddlers Ferry at the area north of the former power station could be considerably expanded. The location could be readily served by high-quality inter-urban bus services operating between Widnes and Warrington, including running “express” limited-stop services east of Sankey along the Sankey Way.
56. It is noted that the former power station site is rail-served, but there is currently no passenger service on this line. Should any future local (not HS2 and HS3 high speed) service materialise, perhaps Merseyrail running from Liverpool to Warrington Bank

Quay via Fords Halewood and South Widnes (where additional new stations could be provided), a new station could be created at Fiddlers Ferry. However, the case currently appears weak, for reasons of likely low patronage. The opportunity for this would be strengthened if a significantly-larger settlement was planned.

57. Additionally, as noted, there are much stronger opportunities for:

- a significant new rail-served settlement in the north-west of the Borough, between the A562 and where the A5080 intersects with the Liverpool-Warrington-Manchester rail line, albeit that this on Green Belt land including an unspecified mineral reserve. A new station would be needed, served by existing Liverpool-Warrington-Manchester stopping trains. To minimise the differential in levels between highway and pedestrian/cycle access, parking etc and the platforms, the station would ideally be immediately west of the recently-renewed A5080 bridge but on the north side of the embankment, probably with a subway through the embankment to a westbound platform (this would place the station forecourt one metre inside the Halton boundary).
- south of the existing high-quality station at Birchwood, some distance to the south of the peat reserves. Both of these sites can be served by existing regular stopping trains, and Birchwood is additionally served by fast trains, with fast journey times of just 4mins to Warrington Central, just 15mins to Manchester, and 40mins to Manchester Airport and 37mins to Liverpool. As far as is known, these two rail-served sites have not been looked at, and are not in the Plan.

58. The loss of a moderate area of Green Belt in this north-west part of the Borough would be regrettable, and would very understandably be objected to by the very small number of existing local residents, but would avoid the loss of a similar or possibly larger area of significantly-higher quality Green Belt landscape in South and South East Warrington. Local house values would mostly probably rise with dramatically-improved accessibility, with compensation for any loss of amenity. So, taking a strategic pan-Borough view, the overall result regarding Green Belt would either be neutral or beneficial. The location also is part-covered at its north end by a Mineral Safeguarding Area designation (for sub-alluvial river terrace deposits), but this is probably of marginal overall consequence.

59. As already noted, there are proposals for a number of new homes at Winwick. But the number could be readily expanded on this bus-served inter-urban corridor with its good bus access to Warrington, St. Helens and Newton-le-Willows and rail access via Warrington Central and Newton-le-Willows stations.

60. As already emphasised, a pivotal influence upon planning for Warrington's future is the (probably-unique) fact that three significant west-to-east waterways, which are (in north to south order) the River Mersey, the Manchester Ship Canal and the historic Bridgewater Canal. These considerably impede north-south movement. Crossing the Manchester Ship Canal is particularly problematical. New crossings are almost certainly unaffordable, and will be accompanied by specific-site difficulties due to height, intrusion and access.

61. As commented elsewhere, it is a fundamental flaw in both the LTP4 Transport Plan and the Local Plan, when so many trip-attractors such as the Town Centre, Winwick Road and Gemini retail parks, the hospital, the two main rail stations, the Lingley Green and Omega employment sites and Birchwood Science Park are all on the north side of the three waterways, to then plan to massively develop housing on the south side of the waterways, thereby severely stressing the very limited number of crossing-points.
62. Two of the key crossings of the Bridgewater Canal comprise only a single reversible lane with traffic signals and a lack of queueing-space on their north sides, and one of these (Stanney Lunt bridge) is severely weight limited. No solutions are offered in LTP4 or the Local Plan to these inescapable problems.
63. The above positive alternative proposals make significantly-better use of existing infrastructure, particularly the dual carriageways and the local rail system. The housing proposals for the Local Plan could then be modified as follows (in clockwise order):
- Croft: instead of 75 new homes, a marginal increase up to 125 new homes.
 - Culcheth, instead of 200 new homes, a marginal increase to 250 new homes.
 - Peel Hall: 1,200 new homes, as published.
 - Hollins Green: instead of 90 new homes, a marginal increase to 150 new homes.
 - South of Birchwood station (beyond the peat reserve): major new site (not in Plan), 500 new homes, with Birchwood Centre-A57 link road parallel to M6.
 - Thelwall Heys: instead of 310 homes, zero.
 - Lymm, 306 new homes, as per Plan.
 - South East Warrington Urban Extension: instead of 2,400 homes with a further 1,800 homes (total 4,200), it is proposed to drastically reduce this to 500 homes with a further possible 500 homes beyond the Plan period.
 - Waterfront: instead of 1,000 homes with a further 300 beyond the Plan period, a marginal increase within the Plan period to 1,100 with a further 300 beyond the Plan period.
 - Fiddlers Ferry: instead of 1,300 new homes, with a further 500 beyond the Plan period,, an increase to 1,500 new homes and still (as per Plan) with only a further 300 beyond the Plan period (i.e. same final total).
 - Farnworth Road/Barrow's Green (new rail station): major new site (not in Plan), 1,200 homes with a further 500 beyond the Plan period.

- Winwick: instead of 130 homes, 500 homes (an increase of 370).
64. In addition to the above, it is suggested that further measures are taken to redevelop existing low-utility retail and industrial sites within the historic Town Centre and its surrounding “Polo Mint” of inappropriate land uses. A target of an additional 5,000 homes, built on what are now car parks, retail outlets that could be relocated, and other “tired” industrial sites where occupiers would benefit from relocation to new industrial units, should be realistic, spread over the Plan period up to 2038.
65. The above would thus give broadly the same overall outcome, but would offer major relief to the overheated South Warrington highway network. It would achieve this by developing two new significant rail-served sites (Barrow’s Green and south of Birchwood), with an accelerated development of a third site (Fiddlers Ferry) that would also have the potential to be rail-served. The principal transport infrastructure required would be as follows:
- Western Link (as currently proposed) to open-up access to the Waterfront development and Port Warrington. Should the Western Link not prove able to be funded, on cost-benefit grounds, as seems very probable in the present financial climate, then an alternative access strategy would need to be developed, or alternative sites (such as around the Town Centre periphery) sought.
 - A modest new single-carriageway link/access road between Birchwood Centre and the A57 to the south, parallel to the M6 and approximately half a mile east of it. There would need to be a new road-over-rail bridge east of Birchwood station, and sound barriers on the east side of the M6 where parallel with (but still set-back) new housing.
 - A new rail station at Barrow’s Green where the A5080 intersects with the Liverpool-Warrington-Manchester rail line. The site is accessible, and conveniently falls exactly halfway between two existing stations, Widnes and Warrington West, making it operationally suitable for train acceleration/braking.

South East Warrington Employment Area Proposal

66. The South East Warrington Employment Area, as detailed elsewhere in this submission, is an extraordinary breach of current Government thinking.
67. The National Planning Policy Framework 2021 states that: “Planning policies should.....support an appropriate mix of uses across an area.....to minimise the number and length of journeys needed for employment.....” (etc).
68. The siting of a major employment centre fully four miles out of the Town Centre, and remote from most of the bus network and any rail facility, directly contradicts this Government guideline. It also contradicts a range of transport policies, as set out in detail in the appendices. Provision of a bus shuttle to the Town Centre will not overcome the access problems.

69. The Local Plan's wholly-inappropriate preference for a non-rail-served, non-waterway-served logistics mega-base alongside the intersections of the M6 and M56 is ironically matched by the Plan's dropping of the Port Warrington proposals, which would have created a road/rail/maritime freight interchange. Any consequential damage from the Port Warrington proposals to Moore Nature Reserve could have been at least partially offset by compensating measures. The Council's apparent complete disinterest in locating a major freight logistics hub alongside the West Coast Main Line begs rational explanation.

70. In the Transport for the North "Strategic Transport Plan Evidence Base", January 2018, under the heading "Inland Freight Terminals Scenario" (p155), it states:

- (para 5.5.3.1) ".....there is strong encouragement towards the decarbonisation of freight transport and a move towards low/zero emissions. This will open up many opportunities around modal shift and how it can be achieved."
- (Then, under "Intermodal connectivity") the report points to: ".....improving the establishment of increased intermodal terminals across the North, and their connection to the rail network. This may be through working in partnership with local authorities."

71. The general nationwide failure of local authorities to understand the need for carefully planned multimodal logistics hub has recently been specifically commented on adversely by the National Infrastructure Commission: "Planners have access to a wealth of instruction and guidance about housing, little on employment, and almost nothing on the specific needs of freight. This makes it difficult to reflect both the need for freight and the needs of the freight system in plans and decisions." (Future of Freight - Interim Report: National Infrastructure Commission, Dec 2018, p22).

This Response's Principal Conclusions

72. This Response's principle conclusions (on the Plan's approach).

- The Updated Plan is relatively little-different from previous hugely-unpopular versions.
- the Plan appears to have started with identifying sites that are principally in the ownership of Homes England, and taken insufficient account of other sites elsewhere. It reads like an inherited plan from the 1960s, rather than the 2020s and 2030s (and beyond).
- the Plan focuses on sites that will appeal to developers wishing to develop traditional 1960s-type estates, with brownfield sites and town-centre regeneration only playing a secondary role.

(on the hoped-for modal switch to cycling)

73. Though there are many very welcome mentions relating to the provision of cycle routes, the value of such routes within and beyond the new estates will be limited by the lack of good integral door-to-door cycle priorities, particularly in the case of cyclists negotiating Stockton Heath and Latchford, including negotiating the swing bridges, and the deterring gyratory systems that surround the town. The emphasis on cycling also fails to recognise the hilliness of Grappenhall Heys/Appleton in relation to Stockton Heath/Latchford. Cycling is likely to only account for a very small modal share, particularly in winter.

(on the hoped-for modal switch to buses)

74. There are repeated mentions of the bus network that, if critically pressed, crumble. Buses will only run where there is either adequate revenue or compensating subsidy. In South Warrington neither can be guaranteed in any way, and the future prospects for public subsidies for unremunerative evening/Sunday services are particularly bleak. Bus travel, too, is likely to account for only a very small modal share.

(on the hoped-for switch to the as-yet undefined Mass Transit system)

75. There has been a very serious failure to develop any substantive Mass Transit system to the point where it can be assessed, even in outline, in terms of design, suitability, modal share it might take, and funding. Yet it is being put forward as making a very significant contribution to the Plan's approval and implementation. This is clearly wrong, and unprecedented in my professional experience.

(on behavioural change)

76. The switch to cycling and cars, if they took place, assuming comprehensive cycle networks and a Mass Transit system were funded (a great leap of faith) is further-dependent on significant behavioural change by the present and planned-incoming population of Warrington. No substantive evidence, in terms of attitude surveys, let alone practical hard experience from elsewhere in the UK, is offered to support this.

(on cars)

77. In contrast, the proposed homes are relatively low-density and are likely to be remote or very remote from workplaces for most residents. There are likely to be two cars on each driveway. The car is extremely likely to account for the great majority of trips, and in evenings/Sundays for virtually all trips.

78. The incentive to use the private car will be emphasised by the difficulty of efficiently-reaching most destinations by public transport (other than Stockton Heath village centre and the recently steeply-declining town centre).

79. There will be virtually no means to inhibit private car use. Additional cars will not only create additional congestion and delay to other drivers, but will further undermine the

reliability of bus services. Spending on new roads and upgraded junctions will underpin heavy car use.

(on HGVs)

80. The proposed South East Warrington Employment Area is a recipe for increased HGV movements, both on the busy local road network and the M6 and M56 corridors. It runs totally counter to Government policy. It is little short of astonishing that the proposal has been put forward.

(on Warrington's basic congestion-geography, with the three west-east waterways)

81. It is a fundamental flaw of the entire Plan that it has concentrated development on the south side of the Bridgewater Canal, the Manchester Ship Canal and the River Mersey when so many trip-generators - the town centre, the General Hospital, Central and Bank Quay rail stations, the Winwick Road and Gemini retail parks, Omega, Lingley Mere, Woolston Grange and Birchwood - are north of these west-east waterways.

82. There are already known traffic bottlenecks at Stockton Heath high street, Stockton Heath swing bridge, Lumb Brook bridge, Knutsford Road swing bridge and Latchford gyratory, with further congestion in the town centre and the A50 Kingsway/A57 Manchester Road junction. The Plan offers virtually no amelioration for these. The proposed Western Link, the Council's premier highway scheme, is near-irrelevant to easing local travel needs in Stockton Heath, Grappenhall and Latchford.

83. Additional car traffic will also significantly worsen conditions for pedestrians, cyclists and other drivers at numerous locations. Crossing roads safely will become significantly more difficult for the young, for disabled residents and for older people. Even drivers, such as inexperienced drivers and older drivers, will find conditions more intimidating and stressful.

A More Ambitious Vision for "Warrington 2050"

84. The overall purpose of the Local Plan is to work towards creating a better Warrington for the mid-21st century. Warrington is currently a bright spot in a generally economically-underdeveloped North of England Region that, overall, lags far behind London and the South East. This can be changed, but it requires greater ambition and much greater care.

85. Warrington could become a City, but to achieve city status it will have to raise its game considerably. The published Local Plan tries to do this, but does not aim nearly high enough in terms of quality. More disturbingly, it will bequeath the Warrington of the future with intractable transport problems.

86. The three west-east waterways are not going to go away, and will increasingly-impede internal movement, causing increasing delays and damaging quality of life. It is vital that this reality is recognised.

87. There will never be sufficient finance available to construct ring roads, new Manchester Ship Canal high-level bridges and dual carriageways. Warrington cannot build its way out of traffic congestion. The arrival of electric cars will not ease congestion.
88. There is an open opportunity for Warrington to become regarded as a centre of excellence in its planning, and in the way it has adapted an historic, and later industrial, town to the needs and aspirations of the 21st century. The next 20-30 years could see a remarkable transformation of the Town Centre, enhancing its historic, cultural and business aspects.
89. The Town Centre could become a model for other medium-sized conurbations to follow. Retailing could be turned-round by establishing shops with a stronger individualistic identity, rather than the “chains” that have so dramatically declined.
90. The Town Centre could gradually build-up a resident population that would not only enjoy residing there but would directly-support the retail and cultural life of the centre, rather than shop by car in “sheds”. Town centre employment also needs to be grown.
91. The Town Centre must become a desirable place to visit, like other historic towns. It has to work very hard indeed to do this, and that hard work has to start now by amending the Local Plan to something much more aspirational and less damaging and unpopular.
92. It must identify low-value sites that are currently used for car-parking, car showrooms, car-served “sheds” and wasted roadspace, plus of course derelict/undeveloped sites. This may take a long time, but will repay by displacing car-served retail and industrial premises - which can easily be relocated elsewhere - with characterful housing, restaurants and other activities. The re-discovery and “culturalisation” of the Mersey waterfront - currently almost completely wasted - could be a key feature. Many towns would love to have a waterfront but lack a major river.
93. There are other opportunities. Warrington is within easy reach of both Manchester and Liverpool airports, with direct rail services to Manchester Airport. HS2 services will call at Bank Quay from the end of this decade, and the emerging plans for Northern Powerhouse Rail/HS3 may also beneficially impact upon Warrington (the details are imminent at time of writing). The fact that two major rail routes intersect at Warrington, with a third close by at Newton-le-Willows, is a huge opportunity for railfreight to serve Warrington that has yet to be recognised.
94. To quote just one recent study, “The key to achieving sustainable distribution for medium- to long-distance flows is the development of Strategic Rail Freight Interchanges (SRFIs) and port-centric distribution. SRFIs are.....modern large-scale distribution centres co-located on the same site as an intermodal terminal. This renders rail freight services to and from the SRFIs more cost-effective.....” (from Understanding the UK Freight Transport System, Government Office for Science, February 2019). The

Warrington plan for a huge logistics hub at the junction of the M6 and M56 ignores this completely.

95. The, unfortunately, requires a significant, but not total, re-think in its Local Plan, recognising that development needs to follow the transport network rather than the other way around.
96. There is also the opportunity for a Light Rapid Transit (tram) network. Warrington had a five-line tram network until 1935, but it was too short in reach and outdated in equipment. Whilst it would be technically possible to construct tram routes southwards and south-eastwards over the Ship Canal bridges, as the original network did or planned to do, a far greater opportunity lies to the west, north and east directions. The A57 westwards, the A49 northwards and the A57 eastwards all offer heavily-populated corridors served by highways that are mostly broad, with only green space or car parking alongside.
97. These three corridors could form an initial phase of a light rapid transit system reaching out to Penketh/Sankey, Winwick and Martinscroft (and perhaps northwards to Birchwood station), complemented by a modern bus network using the latest low-emission or electric vehicles. But this would require further examination, and as noted the likelihood of necessary Government funding would be low or even very low.
98. This Submission has put forward constructive and positive alternative ideas as to how the Borough Council can “square the circle” of promoting growth without severely-worsening congestion and further damaging quality of life. Warrington has to grow, but it should do so more ambitiously and more thoughtfully. It is requested that the Local Plan is re-thought to deliver some of the above objectives.

(Appendices 1 and 2, to be read in conjunction with this Submission, are circulated as separate documents)

David Thrower
8th November 2021

